

Submissions received on the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy, November 2024

Organisations / Businesses who do not wish to speak to the hearings panel

ID	Overall, do you support the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy?	Submitter feedback	Name - Organisation
28681	Somewhat	Overall feedback The Charteris Bay Residents Incorporated have concerns about some of the proposed actions for the road as outlined below Specific area feedback Te Wharau Charteris Bay Page 56 of the Coastal Hazards Draft Adaptation Plan shows a preferred pathway to Protect and Raise vulnerable sections of Marine Drive to protect assets including the road, water supply and waste water starting immediately. Page 79 of the Coastal Hazards Draft Adaptation Plan states that an amount of \$800 000 has been set aside in the 0-10 year period for this work to be undertaken on the Southern end of Marine drive. The CBRI believe that this amount is seriously inadequate to achieve the outcome and the work on this section of road should also be completed with urgency. Considerations would include; 1) Repairs are needed for the coastal erosion under the road in and around the seaward side of the road that is already occurring. 2) Protection of essential drinking water and waste water services. 3) Raising of a significant length of the Southern end of Marine Drive which has already flooded a number of times trapping the community from Port Levy through to Charteris Bay preventing supplies and emergency services into the area. 4) This section of road is not only relevant to Charteris Bay but to all communities through to Port Levy. 5) The need for a footpath at the same time this work is undertaken to make safe for pedestrians who are already walking this stretch with no safe path to walk on. 6) A footpath would work in with the objective to achieve the Head to Head Walkway for this section of the Coast. The suggested budget also indicates an amount of \$17000 000 for the North Section of Marine Drive in the 10-30year time frame. Where is the technical detail for these figures? How does the Council intend to raise and armour the road? How do these figures tie in with the annual maintenance budget. The Boat Ramp The Timeline on page 57 of the Coastal Hazards Draft Adaptation Plan for the Charteris Bay Boat Ramp indicates the Boat Ramp will be discontinued after 50 years. The CBRI do not believe this is the best course of action for the following reasons. 1) The Charteris Bay Boat Ramp is widely used by the community and the Canterbury region on a daily basis including recreational activities, families and fishermen and has been for many years. 2) The Charteris Bay Boat Ramp is more heavily used and usable by the wider community than the Purau Ramp and provides safe access for two boats at once, as well as safer launching for families. 3) The launch ramp is not as steep and thus safer than the Purau Ramp. 4) The CB Boat Ramp is subject to tidal limitations but these limitations should be lessened if the sea level rises (presumably low tides will become higher) 5) The CB Boat ramp has far better parking and safe parking options and has public toilet facilities. 6) If the road side alongside the boat ramp is being protected by being raised then it would seem logical that the same could easily be done for the parking area at the boat ramp at the same time. 7) This is a potential emergency access location for emergency services or for evacuation reasons. We believe this boat ramp should be maintained indefinitely. Kind Regards	Sandy de Vries, Secretary - Charteris Bay Residents Incorporated

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		Sandy de Vries Secretary CBRI	
29440	Yes	See attachment - page 18	Rosa Verkasalo, Policy Advisor - National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand Te Whatu Ora
29939	N/A	See attachment - page 23	Hannah Marks, Land and Planning Advisor - Orion New Zealand Limited
29944	N/A	See attachment - page 42	Chris Ford, Policy Advisor - Southern and Central - Disabled Persons Assembly (NZ) Inc
29946	N/A	See attachment - page 49	Ian Currie, Chairperson – Church Bay Residents Association
29947	N/A	See attachment - page 53 Specific area feedback Purau See attachment - page 53	LE Burrows, Secretary - Purau Moorings Association
30083	N/A	Specific area feedback Allandale See attachment - page 57 Teddington See attachment - page 57	John Bannock, Chair - Governors Bay Community Association
29942	Yes	Overall feedback WWB generally supports the Council’s Draft CHAP and recognition of the risks that climate change poses to Whakaraupō Lyttelton Harbour’s vulnerable public assets over the next 30 years. Specific area feedback Teddington See attachment - page 61	Jacqui Hewson, Consultant - Winstone Wallboards Limited (WWB)

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Individuals who do not wish to speak to the hearings panel

ID	Overall, do you support the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy?	Submitter feedback	Name
27965	Yes	Overall feedback I've lived in Sumner for 50 years and love it but things will change in the coming years and we must adapt.	Gina Armon
27967	Yes	Overall feedback Overall, and while not agreeing with all the detail, I think the plan is a reasonable way forward. Specific area feedback Teddington I support the proposal. The rate payers can't afford to defend every bit of road or every asset. Te Wharau Charteris Bay I think that the Charteris Bay boat ramp could be protected for longer at relatively little cost. Over the Christmas / New Year period it is very heavily used and the other boat ramps mentioned in the plan couldn't cope with the extra level of use without upgrades (eg parking, access roads) that would cost more than protecting the Charteris Bay ramp. Further the Charteris Bay boat ramp gives access to a relatively sheltered section of Lyttelton Harbour - getting from Quail Island, Hays Bay or Paradise Beach up to Diamond Harbour or Purau can often require punching into a large easterly swell which is not easy for small boats. The area of Marine Drive adjacent to the boat ramp is going to be protected so not difficult to tack on a minor lifting of the parking area.	Guy Mortlock
27980	Somewhat	Overall feedback Suggested mitigation planning and asset evaluation, seem to align with indicative flood / sea level rise risks. Generally, assets have been considered for their community value and usage. Specific area feedback I would urge you to reconsider the methodology used to manage the future of the Allandale domain. Particularly in the value that has been assigned to its community use. The land in question is host to many events, school sports days, weddings and more. The hall has been incredibly missed during its closure over the last year or so, and to lose the last element of this community hub would be a shame. This is also one of the only flat, accessible sites with good public parking across the Bank's Peninsula region, which should give it heightened value. Please reconsider the decision to reforest / revegetate and instead, allow for reduced management, with a longer usable lifespan.	Bex Jenkinson
27982	Somewhat	Overall feedback Maintaining the roads that are a main route for people living over this way is essential. Removing allendale hall- I think it should stay. If repaired this would be a great asset once again to the community here. It also has historical value to the area. Maintaining and improving the biodiversity is also essential around the harbour. The sludge and mud is engulfing everything- water quality is at an all time low. Where once lived starfish and sea anemone is now mud and sludge. To get the biodiversity back the water quality needs to be sorted first.	Olivia Smith
27993	No	Overall feedback It is far too early to be taxing ratepayers. The areas under consideration have yet to show significant flooding. Any money raised from ratepayers is almost certain to be spent on consultants and staff conducting interminable modelling well in advance of any requirement. If a problem becomes apparent in any of these areas it will take a relatively short time to assess and remedy it Specific area feedback Purau The boat jetty already requires upgrading of supporting piles, this should be undertaken now regardless of the plan.	Chrisopher Hutching
27995	Somewhat	Overall feedback Frankly this is too much to really consult on, in my opinion. I am pretty good at being able to sit down and read through but this was too much for me to get through. I read up until Allendale. As for what I did see, it feels to me like we are trying to preserve a way of life (access) to things that we will not be able to afford in 30 years time and that adaptation means, in some respects, adapting to something not being available. The current manner in Rapaki of getting to the water as an example - beach access. I think we need to really get	Sarah van der Burch

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		our heads around some major changes and not saving things because we currently like having them in the form they are. I think we will need to look at having access to the beach in a different way. Spend the money to protect the treatment plant and the wharf and I am sure people will find a way to get to the water - will there be any beach? People who gave feedback on what they wanted (me included) did so with an eye towards today not towards the reality of the future.	
28012	No	Overall feedback I feel like it has been done without knowledge of the local community and the way they use the harbour. It is a cost saving initiative while millions of dollars are being poured into Sumner's waterfront. We feel left behind and abandoned. It's appalling. Specific area feedback Allendale Allendale Domain is used regularly by the community. It's the only large stretch of green space in the upper harbour. You barely maintain any other public parks or playground for our tamariki and this would put the local community and school at a disadvantage with nowhere to hold large scale sports events or fairs. It's selfish and has been decided by people in an office far removed from the realities of our community.	Chloe Delamore-Black
28014	Yes	Overall feedback No-brainer. Best to act now and spread the costs. Plus time to educate people. So many climate breakdown deniers. Raising roads is expensive. But what about relocation of homes? Managed retreat ?	Maree Quinn
28037	Somewhat	Overall feedback There alternative solutions available that I perceive have not been considered. Specific area feedback Te Wharau Charteris Bay A temporary route could be constructed for times of flooding from near the bottom of the hill around through the golf course and Orton Bradley joining up with Andersons Road. It need only be constructed of compacted roadstone (like many other roads on Banks Peninsula) and would serve a purpose during times of need. It would suffice for approx 50 years after which it could be upgraded to an asphalt/tarmac surface. You could future proof it by laying a number of ducts and pipes in the construction for later use. Raising the whole road round the shoreline will come at enormous expense. This will be considerably cheaper in the short and long term.	Stephen Palfrey
28048	Yes	Overall feedback Access to services and regions is important for human safety.	Niki Maritz
28050	Yes	Overall feedback This seems like a realistic plan that weighs up the costs and risks well. I think we need to be aware that there are considerable uncertainty over the timing, especially in the face of the possibility of climate tipping points being triggered that could result in sea level rise > 1m. Specific area feedback Te Wharau Charteris Bay While it's true the boat ramp is used it is highly tidal and not always practical. Has thought been given to an alternative location, such as Hayes Bay?	Dugald McDonald
28053	Yes	Overall feedback I have read the document and considered the options. Balancing the needs of the community and access against finances and timeframes has been challenging but the choices to adapt, mitigate and retreat rather than continue the status quo or move roads is sensible. These communities require safe access in extreme weather events. Specific area feedback Allendale I am surprised that it would cost \$630,000 to remove the Allendale Hall and landscape that area. It seems an incredibly high cost compared to road reparation... I am also surprise at the estimate \$500,000 to remove the tiny toilet block...	Beatrice Cheer

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28134	Yes	Overall feedback The plan appears to have be very thoughtfully considered, with significant community consultation and engagement. The plan effectively balances environmental and ecological considerations, human habitation and community preferences, and fiscal considerations. It is appropriate the plan remains dynamic in terms of timings and options as the future impact of rising sea levels and coastal erosion, is unknown (despite predictions and modelling). Great job, and a huge thank you to the team who have undertaken this work on behalf of our communities.	Kelly Nalder
28161	Yes	Overall feedback The plan is well constructed, carefully considered and uses relatively conservative estimates for Climate Change based on science (not rhetoric). The focus on particular infrastructure elements is fair and reasonable. The costs are not insignificant but these need to be aired now and not 25 years in the future. The financial impact on the CCC is high and must be addressed and not ignored.	Bob Frame
28163	Yes	Overall feedback Read all 72 pages and it seems reasonable. Road moving, seems easiest but costly so discounted. Why not make it easier for the land to be donated? Rather than purchased? Perhaps in return for rates relief or discount?	Dorje McKinnon
28217	Yes	Overall feedback A lot of work has been done to consider the hazards and available pathways of action with their impact on the community, the environment and rates. I'm so glad you are doing this!	Alex Hallatt
28221	Yes	Overall feedback It protects and maintains the major assets of each area, while remaining practical. Specific area feedback Koukourarata Port Levy I thoroughly support the plan for the area in which I live. It maintains the assets that are well used and is sensible regarding the issue of road access.	Karyn Davis
28385	No	Overall feedback Throwing good money away because one cannot stop the inevitable. Also the predicted rise in the sea level doesn't warrant this type of reaction.	Allan Cameron
28513	Yes	Overall feedback It is clear earlier feedback has been heard and draft options reflect this and try to balance extending use of assets with cost considerations Specific area feedback Allandale I support the proposed action with regard to the Governors Bay to Allendale foreshore track and to restore the ecological value of the Allandale domain through landscaping and planting natives. Teddington I support prioritising Gebbies/Charteris Bay road as the primary access I support maintaining the Governors Bay/Teddington road at lower levels of service and floodproofing as required. Although Gebbies Pass provided resilience in the long term, the Governors Bay/Teddington road is the most direct route for access to southern eastern parts of chch, and is worth maintaining some level of access and use. Te Wharau Charteris Bay Boat ramp - I support maintaining the use of the boat ramp for as long as viable. I note that the plan proposes that once closed the alternative ramp at Purau could be used. If this is the case, it is vital that Purau ramp is upgraded and maintained to ensure there is at least one ramp for private use on this side of the Harbour. A further option to consider, is that once sea levels rise, the boat ramp use may be less restricted by tides. If that is the case, a further option may be to modify the ramp, so it can continue to be used just as a ramp, without parking. This gives residents in this part of the harbour the ability to launch boats, and they can park trailers back at their own properties. Marine Drive - I support this as the main access road to Charteris Bay and the communities beyond that. Protecting the road and existing piping infrastructure makes sense. I would	Erica Henderson

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		propose that at the same time that this work is being planned and costed, you work with the agencies planning the Head to Head walkway. Previously both Marine Drive and Andersons Road were proposed as alternative routes for the Head to Head walkway, however Andersons Road is steep, diverts walkers away from the tidal/coastal areas of interest, is dangerous to cross from Andersons to Marine Drive at the eastern end of Andersons, and would require proper footpaths to be constructed. A better option is to combine the funding and planning for the Marine Drive upgrade and armouring of the road with the construction of the walkway footpath around Marine drive. This would meet the needs of the community (as well as walkway users) for a safe pathway around this section of Charteris Bay Purau Boat Ramp - the ramp currently is narrow and steep, and difficult to use in lower tides or with strong NE winds, particularly with the piles right next to the ramp. I suggest the ramp needs to be significantly upgraded and widened. Further, with the plan to ultimately close the charteris bay ramp, the Purau ramp will have significantly more people using it and there will be a need to consider provision for day parking for boat trailers as well.	
28525	No	Overall feedback Allow landowners on low lying properties to build up the ground level with clean fill from sub division earthworks without the requirement for resource consent. This would help protect low lying property owners to protect their homes and assets value. Specific area feedback Teddington As above let land owners build up the level of the low lying areas with clean fill. This would protect the road and private property owners homes	Doug Burt
28567	N/A	Specific area feedback Te Wharau Charteris Bay I think the plan to plan to spend money to save the Purau boat ramp but not to save the Charteris bay boat ramp is wrong. The Charteris Bay boat ramp is more heavily used and usable by the wider community than the Purau ramp and as a wider boat ramp provides safe access for two boats at once. The CB boat ramp is subject to tidal limitations but these tidal limitations should be lessened if the sea level rises (i.e. presumably the low tides will become higher as the overall water volume rises). The Charteris Bay boat ramp has far better and safer parking options than the Purau ramp and has public toilet facilities available. If the road alongside the boat ramp is being protected by being raised it would seem logical that the same could easily be done, at the same time, for the parking area at the boat ramp. The Purau boat ramp by comparison is narrow, affording access for one boat only at a time. It is also steep and at times extremely slippery given how steep it is. In summary Charteris Bay boat ramp is more easily accessible by the wider community for recreational boating, allows for multiple boat launches at one time, is safer, has public toilet facilities, is likely to have a better window for launching boats as the sea level rises, can be upgraded at the same time as the adjacent roading is being protected/ raised and has far better parking options than the Purau Boat ramp. Purau Please see above	David Wensley
28619	Yes	Overall feedback I'm very impressed at the level of detail that has gone into this plan. I like that we're thinking ahead, so that we don't over-invest in things that we might not be able to maintain. I like that there are areas which will be naturalised, resulting in improved biodiversity and resilience. I am concerned about the costs associated with these options, as it feels like most things are being protected and retained, rather than making harder choices to give up on existing assets. This work also really shows how vital it is that we do our part to reduce our carbon emissions, to avoid the worst effects of climate change.	Arthur McGregor
28700	Yes	Overall feedback I appreciate the time and expertise that has gone into this plan. I also understand that the future is unknown to a certain extent and your plan allows for flexibility of timelines (for example our Charteris Bay boat ramp) Specific area feedback Te Wharau Charteris Bay We live on Marine Drive, Charteris Bay and would welcome any efforts to raise and protect the existing road. Our main concern however, and always has been... we need a safe walking path along the road. If this could be incorporated into any changes it would be greatly	paula wilkinson

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		appreciated. For many years we have been "Walkers in Peril" and we live more in fear of traffic than we do of rising tides.	
28715	Somewhat	Overall feedback Unclear how this plan fits in the statutory context. Please amend to outline the statutory context for this plan. What's the link to the Greater Christchurch Spatial Plan or Canterbury Climate Partnership Plan for example? Consider an adaptation plan or framework should be developed for the entirety of Christchurch City ahead of this plan, to guide local place-based plans. Funding and financing requires considerably more thought. Principles of equity need to be considered and cost sharing. The costs of adaptation do not fall equally, and future generations are set to pay for the short sighted decision-making of past generations. If funded through General Rates rather than a Targeted Rate, fairness needs to be considered. Some of the adaptation options seem reasonable, cost effective and pragmatic.	George Sariaik
28720	Don't know / Not sure	Overall feedback I just don't know.	Rhys Denton
28730	N/A	Specific area feedback Koukourarata Port Levy I support the proposals of the Plan for Port Levy. It is difficult, indeed, to think of any other possible arrangements.	David Round
28741	Yes	Overall feedback Its very important to be looking to the future and the impacts of climate change on our location Specific area feedback Allandale The foreshore track is a major asset enjoyed by locals and many visitors to the area. It is one of the few public open spaces available and accessible to a wide range of abilities and uses in the community. It provides a very unique experience of peacefulness and tranquility when using the track where the ebb and flow of the tidal zone brings a wealth of birdlife that can be so easily viewed from the track. Whilst it is acknowledged that this track will incrementally be flooded and eroded over time it is important, to maintain it to an acceptable standard, for it to be enjoyed for as long as possible. This public open space has huge benefits to the whole Christchurch community in terms of the following values, i.e. educational, environmental, cultural, health and social.	Jennifer Swaffield
28799	Yes	Overall feedback The initiative is timely and the process is sound and transparent. There are aspects that will need more investigation and more refinement but overall the proposals are sensible. Specific area feedback Allandale 1. Investigating and addressing the Allandale landfill must be a priority action due to the risks of environmental damage to the whole of Whakaraupo when it is breached. 2. The Foreshore Track is the most used public space in Gov Bay, and there is and will continue to be strong advocacy for its retention as long as possible, particularly as the proposed staged withdrawal of servicing does not appear to recognise the use of part of the track for essential access to the Gov Bay wastewater plan. 3. The plan does not appear to address the risks to roading and sewage pumping equipment and sewer pipes in the Sandy Bay area. It was suggested by staff at a public meeting that these were not vulnerable in the 100 year plan period, which is surprising given the erosion along the beach, and warrants checking. 4. The graphic images of the proposed strategies for different areas appeared to create some confusion at the public meeting. There is now extensive published research into the communication of climate related landscape change and adaptation options to affected communities, and it would be wise to investigate how the images might be refined to best effect. (for example see: Sheppard, S. R. (2012). 'Visualizing climate change: a guide to visual communication of climate change and developing local solutions' Routledge; and extensive other work by S R Sheppard and other landscape researchers) 5. I would also like to commend the professionalism of the CCC staff at the recent Gov Bay meeting.	Simon Swaffield

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28803	No	Overall feedback You have not provided any proof of man-made sea-level rise, so as a ratepayer I cannot endorse your plan to spend millions to satisfy the climate change hoaxers. Please also note that you are speaking in the English language, so why do you insert maori names randomly throughout your planning document. If you need to, please create a separate the document by translating into maori so that tiny minority can read that.	David Whitta
29302	Don't know / Not sure	N/A	Kade Glendining
29421	N/A	Specific area feedback Purau Dear C.C.C. councillors. As a longtime user of the jetty and boat ramp at Purau I am concerned about the timeline recently given in correspondence to Purau Moorings Association. Draft Coastal Hazards Adaption Plan. It would appear on page 65 that there is still a considerable amount of time to elapse before the threshold is reached between maintenance and renewal. There is no maintenance being done to the boat ramp! It is in an appalling state of disrepair. I am concerned for the safety of users particularly school groups who are not familiar with the ramp. At times a considerable cross current occurs with incoming and outgoing tides, add to the mix breaking waves it can be dangerous. Two dinghy owners were tipped out some months ago while coming ashore in these very conditions. The woodwork that used to be on the western side of the ramp and gave some protection is long gone. The cracks in the concrete are getting bigger to the point of dinghy wheels being damaged or torn off. I understand how tight finance is, but consideration needs to be given to move the renewal project forward. Thank you for the work that you do. Regards Doug George. Mooring right holder Purau.	Douglas George
29469	Somewhat	Overall feedback I appreciate that the panel has listened to the residents' opinions but feel that some of what has been said was either misunderstood or not examined in sufficient detail. My two areas of concern are the the proposed abandonment of the Charteris Bay boat ramp, and the preference of the Gebbies Pass Road over the Allandale Straight Specific area feedback Teddington The road between Diamond Harbour and Governors Bay (and on through to Lyttelton) plays a major part in linking our communities within the harbour basin. We are united both geographically and socially. We are a unit. The development of eight Community Emergency Hubs within the basin reflects this unity in the knowledge that in any major emergency the harbour basin would very likely become isolated due to the fragility of our road access. In acknowledgement of this scenario we have developed close inter hub relationships. If the Teddington straight is not raised to cope with the increase in water level then this physical link will be broken. I would also like to know the cost breakdown between raising the Teddington road, and straightening and widening the Gebbies Pass road. It is this information that is missing from the plan. Te Wharau Charteris Bay 1) I support the amouring and raising of Marine Drive but would like this to include room for a footpath. This is a residential area and many of us walk. The road has a few short stretches of footpath but, on the whole, there are no footpaths, and it is dangerous for those with baby buggies, cyclists and walkers. With the growth of the population in the bays	Jill Pattinson

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		there has been an increase in the number of trucks using the road. Put 2 trucks going in opposite directions and there is no room for walkers. 2) The boat ramp is a well-used and much-loved facility. The ramp is used by powerboats and jet skis, by the local yacht club on regatta days for yachts requiring large trailers, by other yachties, wind surfers, kayakers and kite surfers. Frequently there are large school groups that use the ramp to launch their kayaks and support boats. The boat ramp also has a public toilet, good parking for launching trailers, and is wide enough to launch two trailered boats at a time. Although use of the ramp is currently limited by tides this should become less of a drawback as sea levels rise. The only other launching facility is not at Diamond Harbour as written in the draft plan, but at Purau. The Purau ramp has only roadside parking, no toilet, and is very steep and narrow. It is for these reasons that I would like to see the boat ramp at Charteris Bay maintained indefinitely, with the car park being raised alongside the work being done to Marine Drive.	
29480	No	Overall feedback My family and family business are located on wharf rd and this draft plan doesn't consider us or our farm. Wharf rd is our lifeline for access our home and the same for our farm ie stock trucks, shears and staff .the road would be easily maintained by putting gabian baskets along road frontage to break wave and tidal erosion . On another note it would have a huge impact on our property values and insurance.	James Barnett
29519	Somewhat	Overall feedback Great that you are looking in to this. In some areas such as Teddington/Allandale, Wharfe Road Port Levy is reed bed/coastal planting of no benefit? Low wave action in the harbour would allow sediment to build up in these planted up areas, protecting the existing roads as well as creating a great haven for wildlife. Specific area feedback Koukourarata Port Levy Wharfe Road. It would seem that no direct consultation was carried out with Wharfe Road residents, some of whom have lived in the area of decades and are very knowledgeable about the environment. I know there has been events that could be attended but generally people do not attend if they are happy with the Status Quo. There was a lot of upset to find that Wharfe Road would not be maintained in the future. Again plantings at the heads could mitigate erosion and flooding for many years. There is also the option to raise the road (approximately a 500 m stretch) with little effort especially if supported by coastal plantings. The Community would be very committed to any labour inputs to help with planting and defence work, to keep costs down. The money wasted during the Adaptation planning on ideas such as bridges and tunnels and other pie in the sky ideas would have easily covered the cost of raising this particular stretch of road.	Jacqueline Broadhead
29543	N/A	Specific area feedback Koukourarata Port Levy Wharf Road: I would like the Council to review the proposed plan to eventually close this road. This road services at least two farms and four dwellings and closure would make the farms economically unviable and the dwellings inaccessible. There would be no realistic alternative access options. It is the Council's duty to provide basic services to dwellings and road access would be one of those. I recommend that the Council meets with local stakeholders and discuss options for maintaining access. Raising the road may not necessarily be the best way to provide access in the future. An alternative might be to move the relevant section of road further inland as it would involve only one kilometre over easy terrain.	Martin Oelderink
29692	Somewhat	Specific area feedback Allandale As a coastal ecologist, I'm really happy to see that the draft CHAP gives high priority to the removal of the Allandale landfill. Despite the high cost of this work, the potential adverse ecological effects and human health concerns due to landfill leachate entering the harbour could be severe, and potentially invisible to the community until too late to rectify. I hope the removal of the landfill remains a high priority in the final plan. I also recognise that difficult decisions were made regarding which roads to upgrade and which to accept will be maintained at a lower level of service. I hate to see the loss of a harbour-wide accessible road, but see that all communities will retain at least one route out of the area. Given the limitations of budget and balancing the needs of multiple communities each valuing their own assets, I accept that the proposed plan for roads seems as fair as it likely can be. If at all possible, it would be great to have some assurance that the roads that will not be moved now still might be able to be moved in the future, if circumstances do change. I am very disappointed that the decision was made to forgo any protective measures on the Governors Bay to Allandale foreshore track, and instead allow the level of service to degrade until the track will have to eventually close. I understand that limited budget means that not every asset can be covered (and I certainly wouldn't support leaving the	Jesse Burns

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		Allandale landfill in place to instead protect the foreshore track), but I do question the logic to spend \$2mill+ to temporarily protect the boat ramp in Charteris Bay when it has more limited community use (only those with small boats), alternative ramps are available nearby, and the ramp will eventually be closed anyway. Spending that money to better protect or possibly rethink (a raised boardwalk that would sit over the water at high tide?) to prolong the life of the foreshore track at a high level of service seems a much more logical choice. The foreshore track supports a wide variety of use (walking, dog walking, running, biking, access to the shoreline and jetty, etc) by all of the community (not just those that happen to have a small boat), and there are no nearby alternatives that provide a highly accessible track away from the road. I also see that other recreational assets (e.g., the Gallipoli Wharf and beach access track in Rapaki, and the jetty and boat ramp in Purau) are to be protected and rebuilt because they have been identified as highly used and important to the local community. I would argue that the foreshore track is just as valued and used by the local community, as I regularly walk the track and have never seen it empty. If use by the community is a determining factor, I fail to see how the decision was made to let the foreshore track close. Please reconsider alternatives rather than just allowing this asset to close.	
29703	No	Overall feedback it is NOT necessary	Gary Durey
29718	Yes	Overall feedback We agree that projected sea level rise and climate change may cause increased flooding and that forward planning is important to manage and mitigate these impacts. Specific area feedback Purau Purau foreshore road - we agree with the current proposal for managing the risk of flooding. Our preferred option for long term management would be to raise the current road rather than creating a new road further inland. We agree with the plan to maintain and/or improve the jetty and public toilet. We agree with the plan for environmental mitigation using appropriate native planting in Purau reserve.	Jacqui Morriss
29733	Somewhat	Overall feedback The work and consultation process along with inclusion of local people to draw up the plan has delivered a considered and balanced proposals. As part of the local Emergency Response Group this work is welcomed and it is imperative that the plan is adopted so as to be a proactive and not a reactive piece of work. There are a couple of concerns which I shall raise further down in the document which is why I somewhat as opposed to wholeheartedly support the plan, but at the end of the day this is a very sound plan based in science and taking local knowledge and communities along during the process and the team should be commended for this. Specific area feedback Allandale The concerns with both the Allandale and Teddington straights are as listed below: -The timeframe in which this work is planned to be undertaken is imperative, there are current issues with both stretches of low lying road and that in Charteris Bay. - As we are a growing community in Diamond Harbour and the council is considering the building of an immersive Maori School here the roading infrastructure needs to be able to withstand increased traffic and not be subject to excessive flooding at high tides - From an Emergency Response viewpoint, it is of concern that we maybe left with one route in and one route out in an Emergency which is not desirable - the outcomes of the decisions of this plan need to be made in conjunction with that affecting the Selwyn side of Gebbie's Pass to ensure that that plan permits this route to be viable. - This plan also needs to connect with ECAN's transport plan to ensure that access to and from Diamond Harbour (and potentially other Bays) via the sea is maintained - again to provide alternate routes to and from Diamond Harbour and surrounding Bays in an Emergency such as a landslide or wildfire on the cliffs. - How this affects this plan is around supporting the need for local jetty's to enable people to access the sea routes Teddington As above, plus consideration needs to be made again to the various uses of the routes out of the Bays east of Teddington. Currently if the plan is adopted as it stands there will effectively be one route from Diamond Harbour and surrounding Bays, which makes the growing community there vulnerable.	Janine Clarke

Submissions received on the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy, November 2024

ID	Overall, do you support the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy?	Submitter feedback	Name
		- If that one route needs maintenance then there will be no alternative route - If there is snow on the Port Hills, then there is no alternative route from ChCh through the tunnel and around the bays - If there is ice on Dyers Pass, often Gebbie's Pass is preferred or again the route Consideration as to how the Ferry will work to compensate for this should ideally be included in the consultation - will it visit more Bays than just Diamond Harbour? Will it run more frequently? How do these costs compare to raising the road? It would be preferable from an environmental viewpoint to invest in making the Ferry route more robust. Te Wharau Charteris Bay Consideration to maintaining the boat ramp (again from an access in an Emergency) situation should be given. Future transport options may necessitate the need for this if access roads at Teddington and Allandale are compromised. Purau Consideration to upgrading the jetty here as an alternative route and to encompass future transport possibilities. A second jetty for the Ferry should be available, should one jetty be out of action for any particular reason. Also given a growing community it might be beneficial to add Purau to the Ferry timetable, as congestion in the current carpark in Diamond Harbour will become an issue.	
29750	Somewhat	Overall feedback I like that the plan is flexible and you are using signals to determine when action needs to be taken . We do not know the future and if the sea level will rise before the alpine fault goes changing everything. I find it curious that Rapaki is included in the plan when there is no flooding there according to your maps, and we know that it is higher than other communities and port of Lyttleton is not included when much of the land is reclaimed and flooding is shown on the maps. Lyttleton port is essential for much of Canterbury and should have been a priority included in this process.	Dianne Downward
29773	Somewhat	Overall feedback I appreciate the council is trying to take steps to plan for the future well in advance, however some measures seem to be planned to be necessarily put in place temporarily before a more longer-term strategy is adopted, resulting in higher cost and potential for more disruption to the lives of affected communities. I would prefer if long-term solutions were sought from the start rather than first moving to interim-measures - for examples maintenance and improvement of existing defences of the Allandale landfill rather than a direct move to removal. Specific area feedback Allandale I agree that the removal of the landfill is very important but would prefer to move to removal as soon as feasibility studies have been completed rather than the council putting additional funding to building temporary barriers. The saved funds could be used elsewhere. I support the plan regarding Allandale Domain as the maintenance of the area, including the hall, would be costly with value added to the community not too significant as the Governors Bay Community Centre is available to use, although a bit smaller. I believe the foreshore track is a very important asset for the growing Governors Bay community and should be maintained open now and in the future, with an addition of boardwalks where the path is at risk of being eroded or inundated by tides. The walk is a very much used and well loved part of the identity of the local community, which is constantly increasing in size and might increase further as the low-lying Christchurch area is affected by rising sea level. As a young family, we have found the Foreshore track to be the only place in our neighbourhood where we could safely take a pram to, and where our young child can learn to ride a bike safely. It is a place of connecting with others, place to go for a run or a walk for those who are unable to walk on the hill and overall a place which improves the wellbeing of the individuals who use it and who are very many, coming from Christchurch as well as locals. I also believe the Teddington road should be maintained if possible. If the road closes in the future, the communities will seek to use the Summit Road more often, as the road through Tai Tapu is not always the most practical, and the Summit road will then need to be maintained at higher cost than current. I trust the size of the community of the Lyttelton Harbour, current and increased in future, warrants maintaining a road which goes around the whole harbour.	Tereza Tutko

Submissions received on the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy, November 2024

ID	Overall, do you support the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy?	Submitter feedback	Name
29783	Somewhat	Overall feedback I approve of the plan for parts of the area but am very concerned about other aspects which I believe prioritise some areas over the others in a way that doesn't reflect populations and use. Specific area feedback Allandale The Allandale domain should be protected as should the hall because these are important historical assets and as the only flat community ground in the area it is shortsighted to not protect it. It is upsetting that the Allandale hall has been closed and has been left so long and not been repaired. This was just regaining momentum for community functions, weddings etc. It has the potential to be used for a long period of time before any sea level rising affects the area. The foreshore track is a well used asset and once again one of the only flat areas for local and others to use. It is extremely important for the community and visitors to the area from over the hill. The Governors Bay Teddington Rd should continue to be maintained its current level. It may need to be raised at some point but it doesn't make sense not to do this as it is the main thoroughfare for residents. It is used for oversize vehicles and hazardous loads from Lyttelton which cannot go through the tunnel. Its also essential for emergency access. It appears that some areas are being prioritised at a much higher cost compared to the cost of raising the road which will service many more parts of the community.	Karen Blatchford
29787	Somewhat	Overall feedback A good initial effort from the council for what is a complex issue with an uncertain timeline 1 Something which appears to have been overlooked is community participation. Restoration of the Governors Bay and Church Bay jetties and more recently the extension of the Diamond Harbour Medical facility has demonstrated how the community and council can work together to maintain or expand a community asset. The option of closing an asset should only occur after all opportunities for community partnership have been exhausted. 2 Maintaining safe vehicle access and services to existing communities , home and properties should be highest priority 3 Maintaining recreational assets and services should also be high priority Specific area feedback Te Wharau Charteris Bay Our family strongly recommends the Charteris Bay boat ramp be retained indefinitely for the following reasons: It is widely used by locals and the wider Canterbury region. It is more widely used than the Pure boat ramp due to its location, gradient, width, ease and capacity of parking and it has a recently upgraded, public sanitary WC. It is sheltered, with user friendly gradient and has a good sized parking area together with the nearby wide berm around Traffic Cop Bay. Is a potential emergency access location. When the road (and services) leading up to the boat ramp is being protected and raised, it would seem logical and economical to raise the carpark and extend the boat ramp at the same time. I'm sure our community will assist to retain this highly used and valued asset. Purau 1. Purau boat ramp and jetty We strongly support the proposal to retain and improve this public facility for recreation and public and emergency access. 2. Purau Waterfront We believe that the council should maintain access to Camp Bay Road. Many private homes, farms and baches depend on this stretch of road. Koukourarata Port Levy Port levy Wharf Road We believe this critical piece of infrastructure should be maintained, given it is the only access to several farms	Howard Buchanan

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ID	Overall, do you support the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy?	Submitter feedback	Name
29788	No	Overall feedback The overall tenor of the Plan gives the impression that the SLR/climate change issue is much more urgent and predictable than the evidence indicates. Hence, in spite of the small print disclaimers, it will be incorrectly interpreted as a definite plan showing the need for circa \$200m investment over the next 30 years. In particular: 1. The figure of 10cm SLR in the last 15 years is specifically rejected in the GHD report. It has no basis in science and should not be used to set the scene for the Plan. 2. The statement on P11 “If tipping points - - - rise much more quickly” should be balanced by an equivalent statement for a low scenario. The IPCC and MfE clearly state that the scenarios have no predictive value. SSP1 is just as likely as SSP3. 3. This Plan is based on the High Scenario for the detailed analysis. But MfE recommend that at least two scenarios, high and medium, should be used in order to reflect the uncertainty in future SLR/climate. 4. Using only the high scenario gives readers (incl house buyers, insurance companies, risk assessor’s, bankers etc) the impression that the adaptation options will be required much earlier than if a range was used. 5. Furthermore, if the local community were given the opportunity of coming to a more realistic understanding of the likelihood of various timings then they may have selected different pathways. Note that the MfE guidelines warn against this, referring to the risk of opportunity cost etc. 6. Throughout the Plan there are instances of wording that implies a prediction of an adaptation action rather than merely an outcome of a scenario. Eg page 41 “The hall will likely need to be removed in the next 50 years - - “. There are many such examples in the Timing columns. 7. For all the Timings there should a range of years given, reflecting the range of Scenarios. This need not require additional pages in the Plan, as the Pathways, Signals and Thresholds remain unchanged. It is not sufficient to say that the Timings will be reviewed as time passes because in the meantime the community will be referring to the Plan as the best available look forward, which it is not - it is merely a look forward based on an assumed scenario. 8. Lastly, the funding table on page 79 is misleading. Although it is noted in the small print elsewhere that it is based on a high scenario, it is not referenced as an assumption for this table. In reality the \$200m cost could be required over the next 30 yrs, or over the next 100 years, we don’t know at this stage. On page 78 the words “would cost” or “would require” are used instead of the more accurate “could”.	Vic Allen
29789	Somewhat	Overall feedback While some aspects of the adaptation plan are understandable I think that a social aspects have not been considered. Specific area feedback Allandale The Governors Bay to Allandale foreshore track serves as a meeting point, place for early morning runs, dog walks or bike rides for local from near and far. It is the only safe place to take a pram, a dog for a walk or learn to ride a bike without having a fear of being hit by a car. I think that a combination of approaches could be explored like the coastal wetlands or living shoreline would suit the area really well since it is already very shallow. Please see the options in the CCC casement on the coastal hazard adaptation options - https://ccc.govt.nz/assets/Documents/Environment/Coast/Catalogue-of-Coastal-Hazard-Adaptation-Options-v3.pdf. Engaging locals worked well for the Governors Bay Jetty. Locals would be more than happy to get their hands dirty (muddy) protecting the foreshore track.	Michal Tutko
29793	Somewhat	Overall feedback My focus was particularly on essential infrastructure through the Allandale, Teddington, to Charteris Bay/Marine Drive. I agree on the shorter-term focus on those critical infrastructure most at risk - wastewater pipes, etc, your approach overall seems sound and considered. Well done, this is not easy work. My ‘somewhat’ is from concern for how the approach to mid-long term ‘signals’ will play out, and impact the feasibility of funding, and implementing, critical ‘preferred’ pathway actions that will ensure the community is not closed off. Expanded on in the next sections. Two additional comments: The ambition I loved was the ecological/nature-based approach to certain areas, fully agree with, and where the Council wherever possible, and assuming LPC is across this as well, engage and advocate support for sustainable finance options, or development of a nature-based investment market (credits etc). Things can move at a glacial pace in central, I know, but there are a lot of great people fully behind getting this moving and can be supported.	Lu Tyndall

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ID	Overall, do you support the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy?	Submitter feedback	Name
		That Allandale Landfill is a real headache for us at 82 million, assume you are working with MfE on contaminated land/landfill sites data, costs, and those most at risk from climate impacts. There is work on this underway but will need that spotlight/hustle on it to get any attention or long-term funding from central – I know that sounds laughable in these times but worth pressuring. Otherwise wager on another one somewhere causing havoc which may be the only thing to get central/Ministers moving. Not ideal. Specific area feedback Teddington My reading of the preferred option is roughly to ‘maintain and somehow deal with disruptions, we have some ideas for how but no commitment yet’ and ‘hope you get funding for the real critical stuff’ but ‘you might not and in that case, you’ll be cut off,’ and ‘by the way, you’ll have one road in and out. Governors Bay/Teddington Road is cooked and we had to prioritise/cut spend here for elsewhere.’ Bluntly. My somewhat agree comes in because ‘preferred’ and ‘priority’ are two very different things – and when we move from the former to the latter, is the most critical point for our community. I’m worried about the ‘signals’ here – and whether they actually give us time. That's where the big work is. Yes, it’s about being flexible and adaptive, because things are ‘uncertain’ but this is the nature of risk – and to be frank I think climate scenarios, and your modeling, give us a far more certain picture of the risk we are dealing with than other types of risk we commonly mitigate in our BAU. We don’t want our ‘signals’ to be the point of collapse, or severe community stress and disruption. I’d prefer we make an educated call prior - really commit to making it an 'early warning' – this is dealing with risk after all. It’s feels a little like, from some of your time frames around 30+ years/2050 - 2070 for some critical things (and understand they are hard to nail) we are waiting for the canary to die, which is fine if we are running out of a coal mine, but not when building infrastructure that will be the make or break of our community adapting/surviving. On those timelines I see some very tight turnarounds between the ‘signal’ and initiating major design, planning, and delivery of raising roads in critical areas etc, and again, looks like somewhere between 2050 and 2070. And the signals seem quite deep down the track as well. Have we got a lead in before that i.e. funding and a design ready to go? Doesn't look like it? So what are our chances? This would take proactive design, and decisions early Noting you’ll be raising those roads under increasingly disrupted circumstances (the trigger after all) – flooding, etc – ergo likely delay and increased costs for your construction. I wager this decision to raise the road, or similar, needs to be made pre or close to 2050. Pushing it out feels like it'll probably blow it - so how can we be set up for the best chance of success here. On such chances, all caveats are made in this document for anyone to point to later, when the community may have its public assets, and access, fully closed off. It’d be great if you can be clearer on the ‘conditions’ – funding, politics, more severe climate impacts than we ‘expected,’ or all of the above. To this effect, the precariousness of our community and possible funding/support hopefully shouldn't elude anyone reading this. My final 'somewhat' comes in because under the preferred pathway the community will face increasing access disruptions until it's no longer tolerable. We could face this until the 30+ year mark when (maybe) a road is raised or fully closed. If this is the case, will you also implement improved monitoring/warning systems for the community and industry who use that road, to plan its travel? Or emergency response? What are our key actions here that as a community, to improve our resilience? Next steps I’d really want to see some hard-hitting conversation and list of actions. An idea for improved monitoring is no good to us if it stays an idea or gets lost in a plan somewhere. If we are having a road cut off eventually along Teddington, or are going to have to bear increasing disruptions, then that better flood monitoring must be funded and implemented. So yes, overall, once the preferred pathway is all set in, action plan and implement. I emphasise this as we can easily get stuck in planning, upon planning, upon planning, and engagement. Or waiting for central government it seems. The big rub being that while we may be worried about releasing information to property owners (the Kapiti Coast effect, litigation etc), or others in the chain, it will have to happen eventually, and strategise a way to do that. To help the community think about its own resilience, or choices, layer the information together. Sea-level rise and our essential infrastructure – you can’t see the two together or what feeds your house. Whatever work is being done to bring that together - and noting this National Government says it is keen for ‘property owners to make better risk-based decisions’ – get behind it, invest, develop a pathway towards it. Te Wharau Charteris Bay Access to Te Wharau obviously impacted by Teddington decisions. see above. Note my comments up front, supporting focus on essential infrastructure most at risk, waste-water pipes. Community can probably consider resilience options as well (water tanks, noting how much drier everything will get as well) but good spurring on, and/or data and information would be helpful. Also mentioned elsewhere. I actually don't understand why the inland road was not considered or 'too expensive' - looking to the worst affected section on page 54. It's probably going to have to happen within 50 years in any case. That land through there is not steep, but it is a golf course. Is that actually what is at issue here? Expensive because a tennis court, and golfers will have to be moved? Are the trade-offs being articulated properly (and noting too long-term access over Andersons Road) I.e. we save the golf course but risk the long-term water/waste-water	

Submissions received on the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy, November 2024

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		supply infrastructure, and access for all the communities past there. Between the houses along that stretch, and the golf course, I can see you'd enter a bit of a hectic quagmire pushing the road inland. Still good to lay it out - 'short term you can still golf, pipes to houses there won't have to move too far, it's cheaper, but long-term, god-speed.'	
29795	Somewhat	Overall feedback I think you are making a mistake by prioritising the Gebbies Pass route to Christchurch from Diamond Harbour over the Dyers Pass route. 1. When Dyers Pass was closed overnight during road works requiring traffic to use Gebbies Pass it added a lot of travel time and distance for Diamond Harbour residents. This adds to use of fossil fuels and wastes time. 2. The Teddington route is used by overweight and oversize vehicles avoiding the use of the tunnel from Lyttelton. This requirement will still need to be met. 3. There is a quarry half way along the Teddington straight. Access to this will need to be maintained, especially if filling is required to fill low areas. 4. The proximity of the quarry to the Teddington straight implies very short travel distances for vehicles to overlay the existing road and raise it, and consequent low construction costs for this section of the work. The road could become a causeway with tidal water each side. 5. Your idea to use 4wd vehicles presumably to cross roads inundated by seawater is delusional. Nobody who owns a vehicle will knowingly drive through salty water lest they wish it to rust away.	David Harding
29797	Somewhat	Overall feedback I support the work in planning ahead for sea level rise but I am concerned that the plan does not yet take into account the views of the community. I hope that the feedback recieved through this process will be properly considered and adopted. The harbour is one community, not one that can be split in two. I was brought up in Cass Bay, my parents worked in Lyttelton and my grandparents lived in Charteris bay and Lyttelton. I have friends and relatives all round the harbour and consider myself a member of the harbour community. Specific area feedback Teddington I support maintaining the vehicle access through Gebbie's Pass however I cannot support the idea that vehicle access through Teddington will not be maintained. Why would it be considered acceptable to break the community in two. When you live in Charteris Bay how will you visit Governors Bay? How will you visit Rapaki or Cass Bay? How will you return from the Lyttelton early in the morning from work or late at night? How will the school bus get to Cashmere? What will happen in a major earthquake if Gebbies Pass is blocked? Te Wharau Charteris Bay I am very much in support of maintianing and protecting Marine Drive and the services beneath it through Charteris bay. This will protect access to many houses in Charteris Bay and maintain access to the communities in Church Bay, Diamond Harbour, Purau and Port Levy. I do not believe that there is any viable or sensible alternative route. I am concerned that Charteris Bay boat ramp is not to be protected. The boat ramp is very popular and it is important to access to the sea. I believe that access to the sea is not for recreation but is a right which should be protected. Purau I am very concerned that the road to Camp Bay and along the foreshore of Purau is not being protected. Surely protecting this road would not only provide the benefit of maintaining access to Camp Bay but also protect the properties along the front of Purau. I would have thought that an analysis of the cost versus the benefit would provide strong arguement for protection once the wider community and property owner costs were taken int account. It seems like a relatively low cost for a huge benefit not only to those properties but also to the properties along camp bay road which would otherwise be unaffected by sea level rise. Camp Bay and the beaches and headland are also a popular and well used asset for not only the local community but also the wider Christchurch public particularly in the summer further strengthening the argument for maintaining and protecting the access road.	Anne Finlay
29798	Somewhat	Overall feedback I am writing to express my concerns regarding the recent proposal to include flooding hazard warnings on Land Information Memorandums (LIMs) for certain properties, and the disproportionate impact this will have on individual property owners. 1. Inaccurate Risk Assessment and Broad-Brush Approach Many property owners are facing a flooding hazard notice on their LIMs, despite the fact that there is no reasonable basis for such a designation. Specifically, properties located on	Michael Palmer

Submissions received on the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy, November 2024

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		solid rock in sheltered bays, such as those not subject to ocean swells or significant tidal action, have been unfairly categorised. In these cases, the risk of flooding and erosion is grossly overstated. While I acknowledge that the council staff have indicated that the current approach is a "broad-brush" one, with limited resources to assess individual properties, the reality is that this classification may be incorrect and unjust for many homeowners. Importantly, there appears to be no pathway for property owners to challenge or correct an erroneous flooding hazard notice. Without an option for review, owners are left with little recourse to ensure their property information is accurate and reflects the true level of risk. 2. Impact on Insurance and Finance One of the most immediate and severe consequences of such flooding hazard designations is the impact on property owners' ability to secure insurance and financing. Once a flooding hazard is recorded on a LIM, property owners are often unable to obtain a bankable insurance policy, regardless of whether the risk is real or hypothetical. This restriction can make properties unsellable, uninsurable, and essentially unaffordable for many owners. This issue will affect not only the ability of owners to insure their properties, but also their ability to secure mortgages, affecting the overall financial wellbeing of families and individuals who have invested in their homes. The consequences of such a designation are immediate and tangible, and will cause significant hardship to those affected. 3. Insufficient Consultation and Community Engagement on the impact of this proposal on private assets. I am also concerned about the lack of adequate consultation and engagement with the affected community regarding the impact on private assets such as homes. The current stance seems to focus primarily on public assets. Given the significant implications for individual homeowners, I urge the council to consider more inclusive and detailed consultation methods that allow for broader community input. This would provide property owners the opportunity to express concerns, submit evidence, and potentially rectify incorrect classifications. 4. Request for Review and Action Given the financial and personal impact that the inclusion of a flooding hazard notice on LIMs will have on property owners, I respectfully request that the council take the following actions: • Conduct a more thorough review of properties identified as at risk, using more specific and detailed data rather than a broad-brush approach. • Provide a clear pathway for property owners to challenge incorrect or unjustified flooding hazard classifications and have them removed from their LIMs. • Improve community consultation to ensure that the voices of affected property owners are heard, and their concerns are addressed before any official designations are made. • Consider the broader implications of the flooding hazard notice, particularly on insurance and mortgage accessibility, and seek to mitigate these effects on property owners who are unfairly affected. Public assets: I support the Chartries Bay community's associations concerns and recommendations as follows. Submission One - The Boat Ramp The Timeline on page 57 of the Coastal Hazards Draft Adaptation Plan for the Charteris Bay Boat Ramp indicates the Boat Ramp will be discontinued after 50 years. The CBRI do not believe this is the best course of action for the following reasons. 1) The Charteris Bay Boat Ramp is widely used by the community and the Canterbury region on a daily basis including recreational activities, families and fishermen and has been for many years. 2) The Charteris Bay Boat Ramp is more heavily used and usable by the wider community than the Purau Ramp and provides safe access for two boats at once, as well as safer launching for families. 3) The launch ramp is not as steep and thus safer than the Purau Ramp. 4) The CB Boat Ramp is subject to tidal limitations but these limitations should be lessened if the sea level rises (presumably low tides will become higher) 5) The CB Boat ramp has far better parking and safe parking options and has public toilet facilities. 6) If the road side alongside the boat ramp is being protected by being raised then it would seem logical that the same could easily be done for the parking area at the boat ramp at the same time. 7) This is a potential emergency access location for emergency services or for evacuation reasons. We believe this boat ramp should be maintained indefinitely. Submission Two - The Road	

Submissions received on the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy, November 2024

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		Page 56 of the Coastal Hazards Draft Adaptation Plan shows a preferred pathway to Protect and Raise vulnerable sections of Marine Drive to protect assets including the road, water supply and waste water starting immediately. Page 79 of the Coastal Hazards Draft Adaptation Plan states that an amount of \$800 000 has been set aside in the 0-10 year period for this work to be undertaken on the Southern end of Marine drive. The CBRI believe that this amount is seriously inadequate to achieve the outcome and works should be undertaken immediately. Considerations would include; 1) Repairs are needed for the coastal erosion under the road in and around the seaward side of the road that is already occurring. 2) Protection of essential drinking water and waste water services. 3) Raising of a significant length of the Southern end of Marine Drive which has already flooded a number of times trapping the community from Port Levy through to Charteris Bay preventing supplies and emergency services into the area. 4) This section of road is not only relevant to Charteris Bay but to all communities through to Port Levy. 5) The need for a footpath at the same time this work is undertaken to make safe for pedestrians who are already walking this stretch with no safe path to walk on. 6) A footpath would work in with the objective to achieve the Head to Head Walkway for this section of the Coast. The suggested budget also indicates an amount of \$17000 000 for the North Section of Marine Drive in the 10-30year time frame, and \$9200 000 for the Southern end in the 10-30yr timeframe. Where is the technical detail for these figures? How does the Council intend to raise and armour the road? How do these figures tie in with the annual maintenance budget Specific area feedback Te Wharau Charteris Bay As above	
29935	N/A	See attachment - page 68 Specific area feedback Koukourarata Port Levy See attached	Carolyn Craw
28634	No	Overall feedback The proposal to close the Allandale to Teddington road is shortsighted, ands frankly stupid. This is a 5km stretch of road that must remain. It would be easily built up, with quarrying material available on site. This is the major way for road for residents of Diamond Harbour through to Port Levy to access Christchurch. To suggest only one road to Christchurch via Gebbies Pass is dangerous. I have on 2 occasions had this road closed by traffic accidents. The road that currently floods first in heavy rains is actually Gebbies Pass Rd. Talk to locals before promoting silly ideas. Specific area feedback Allandale See above Teddington See above	David Carter

12 November 2024

Christchurch City Council
53 Hereford Street
Christchurch 8154

Tēnā koutou

Submission on Coastal Hazards Draft Adaptation Plan

1. Thank you for the opportunity to submit on the Christchurch City Council's (CCC) Coastal Hazards Draft Adaptation Plan. This submission has been compiled by the National Public Health Service (NPHS) Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island including the Waitaha Canterbury District.
2. NPHS Te Waipounamu recognises its responsibilities to improve, promote and protect the health of people and communities of Aotearoa New Zealand under the Pae Ora (Healthy Futures) Act 2022 and the Health Act 1956.
3. Pae Ora requires the health sector to protect and promote healthy communities and health equity across different population groups by working together with multiple sectors to address the determinants of health.
4. NPHS Te Waipounamu is focused on the achievement of equitable health outcomes. We use the Ministry of Health's definition of equity:

In Aotearoa New Zealand people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes.¹

5. This submission sets out matters of interest and concern to NPHS Te Waipounamu, and information included is based on evidence about public health and equity.

¹ Ministry of Health – Manatū Hauora (2024, July 2). Achieving equity. <https://www.health.govt.nz/about-ministry/what-we-do/achieving-equity>

General Comments

6. We welcome the opportunity to comment on the CCC Coastal Hazards Draft Adaptation Plan.
7. Health and wellbeing are influenced by a wide range of factors beyond the health sector. These factors are often referred to as the 'determinants of health', and can be described as the environmental, economic and social conditions in which people are born, grow, live, work and age.²
8. Climate change is a global public health emergency and poses significant threats to health and wellbeing outcomes.³ NPHS Te Waipounamu commends Council for proactively considering and developing the Draft Coastal Hazards Adaptation Plan for the communities of Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.
9. Climate change can affect health and wellbeing outcomes directly through exposure to climate hazards causing injuries and death; and indirectly through greater risk of food and water borne diseases, vector borne diseases, food insecurity, community displacement, lack of access or loss of critical infrastructure, loss of employment, and financial insecurity; all of which have social and economic consequences.⁴ Figure 1 below shows how climate hazards can cause health and wellbeing impacts through various impacts and pathways. Council can lessen the impacts of climate change on the health and wellbeing of communities and households by building resilience into the impacts and pathways through community adaptation planning.
10. NPHS Te Waipounamu recommends that Council considers the equity challenges of responding to and adapting planning for the impacts of climate change. Different populations in Ōtautahi Christchurch will experience climate change impacts differently. For example, people of lower socio-economic status and other marginalised populations are likely to be disproportionately affected by climate change yet be less equipped in terms of social and financial resources to adapt to it.⁵ In addition, communities which are currently experiencing poorer health outcomes will face worse health and wellbeing impacts from climate change hazards. Due to the inequitable impacts of climate change, adaptation policies and planning need to centre equity to ensure that communities and community members who will be most affected by climate change are appropriately supported, resourced, and enabled to contribute to local adaptation planning and building local community resilience.

² Public Health Advisory Committee. (2004). *The Health of People and Communities. A Way Forward: Public Policy and the Economic Determinants of Health*. Public Health Advisory Committee: https://mohlibrary.softlinkhosting.co.nz:443/liberty/OpacLogin?mode=BASIC&openDetail=true&corporation=default_corp&action=search&queryTerm=uuid%3D%225e0914be0a5a01e27fdf294000051624%22&editionUuid=5e0914be0a5a01e27fdf294000051624&operator=OR&url=%2Fopac%2Fsearch.do

³ Te Mana Ora. 2023. Climate Change and Health in Waitaha Canterbury: A scoping and profiling report to inform Health Impact Assessment. Ōtautahi Christchurch: Te Whatu Ora, Te Mana Ora, National Public Health Service. Accessed from: <https://www.cph.co.nz/wp-content/uploads/ClimateChangeHealthWaitahaCanterbury.pdf>

⁴ Cissé, G., R. McLeman, H. Adams, P. Aldunce, K. Bowen, D. Campbell-Lendrum, S. Clayton, K.L. Ebi, J. Hess, C. Huang, Q. Liu, G. McGregor, J. Semenza, and M.C. Tirado (2022). Health, Wellbeing, and the Changing Structure of Communities. In: *Climate Change 2022: Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change* [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegria, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press, Cambridge, UK and New York, NY, USA, pp. 1041–1170, doi:10.1017/9781009325844.009.

⁵ Te Mana Ora. 2023. Climate Change and Health in Waitaha Canterbury: A scoping and profiling report to inform Health Impact Assessment. Ōtautahi Christchurch: Te Whatu Ora, Te Mana Ora, National Public Health Service. Accessed from: <https://www.cph.co.nz/wp-content/uploads/ClimateChangeHealthWaitahaCanterbury.pdf>

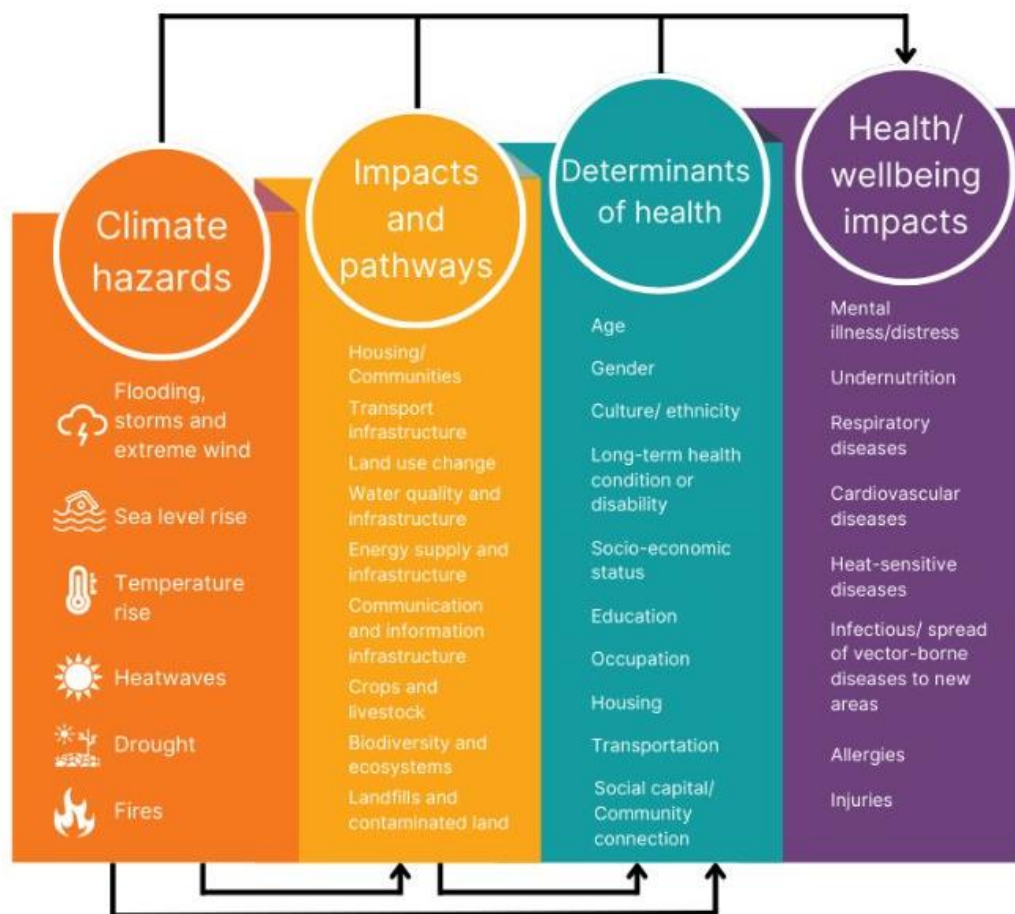


Figure 1: Direct and indirect effects of climate change on health and wellbeing ⁶

Specific Comments

11. Overall, NPHS Te Waipounamu supports the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.
12. NPHS Te Waipounamu note that the Draft Coastal Hazards Adaptation Plan preferred options, particularly regarding the wastewater and water infrastructure in the communities of Rāpaki and Southern Charteris Bay, the landfill in Allandale, and the public toilets in the Pūrau and Koukourarata Port Levy communities, largely reflect the preferences and recommendations we provided in our previous submission to the Council in December 2023 on Adapting to Sea Level Rise. NPHS Te Waipounamu therefore supports this Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.
13. As highlighted in our previous submission to the Council in December 2023 on Adapting to Sea Level Rise, NPHS Te Waipounamu supports communities' preferences with regard to adaptation pathway options that relate to roads, wharves, jetties and recreational areas that

⁶ Te Mana Ora. (2023). Climate Change and Health in Waitaha Canterbury: A scoping and profiling report to inform Health Impact Assessment. Ōtautahi Christchurch: Te Whatu Ora, Te Mana Ora, National Public Health Service. <https://www.cph.co.nz/wp-content/uploads/ClimateChangeHealthWaitahaCanterbury.pdf>

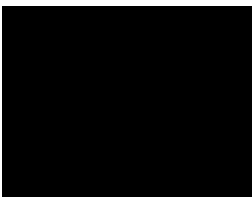
will be affected by sea level rise. In general, NPHS Te Waipounamu would like to see Council progress adaptation options that ensure these communities remain accessible and have reliable access to emergency response and health care services. NPHS Te Waipounamu also recognises the positive health and wellbeing benefits of communities having access to local recreational facilities such as beaches and walkways.

14. NPHS Te Waipounamu commends Council for their thorough and inclusive community engagement processes in considering and adaptation planning for sea level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.
15. We encourage Council to continue to prioritise this future-focused, community engagement work, as it is an essential process for ensuring community voice is centred in responses to and planning for climate change, and it will enable more equitable health and wellbeing outcomes for communities.

Conclusion

16. To summarise, NPHS Te Waipounamu:
 - Commends Christchurch City Council for its proactive approach to addressing coastal hazards and climate change impacts through the Draft Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.
 - Supports continued efforts to prioritise community-driven adaptation, ensuring that all residents have access to the resources, infrastructure, and health protections needed to face the future with resilience and equity.
17. NPHS Te Waipounamu does not wish to be heard with respect to this submission.
18. Thank you for the opportunity to submit on the CCC Coastal Hazards Draft Adaptation Plan.

Ngā mihi,



Vince Barry

Regional Director
National Public Health Service
Te Waipounamu Region

Contact details



**Planning for Sea Level Rise in Whakaraupō Lyttelton Harbour and
Koukourarata Port Levy - Feedback from Orion New Zealand Limited**

TO: Attn: [REDACTED]
Engagement Advisor
Christchurch City Council
PO Box 73016
Christchurch 8154

Delivered by email to: LetsTalk@ccc.govt.nz

FEEDBACK BY: Orion New Zealand Limited (“Orion”)

ADDRESS: Orion New Zealand Limited
[REDACTED]

INTRODUCTION

1. This feedback is provided by Orion in response to the draft Coastal Hazards Adaptation Plan (*draft plan*) for public assets at risk of coastal hazards in the Whakaraupō Lyttelton Harbour and Koukourarata Port Levy area. The feedback is provided in relation to all draft adaptation pathways released for discussion, including those relating to:
 - a. Rāpaki;
 - b. Allandale;
 - c. Teddington;
 - d. Southern Te Wharau Charteris Bay;
 - e. Purau; and
 - f. Koukourarata.
2. As you will be aware, we own and operate the electricity distribution infrastructure in Central Canterbury, including Ōtautahi Christchurch. Our network is both rural and urban and extends over 8,000 square kilometres from the Waimakariri River in the north to the Rakaia River in the south; from the Canterbury coast to Arthur’s Pass. We deliver electricity to more than 220,000 homes and businesses and are New Zealand’s third largest Electricity Distribution Business (EDB). Orion and its various predecessors have been providing this essential service to the region for close to 120 years.

3. Broadly, the electricity distribution network comprises underground cables, overhead lines, substations, transformers, kiosks, electricity structures (poles/pylons, earth rods and associated buildings) and access tracks. Orion is responsible for the establishment, operation, maintenance and upgrade of the electricity distribution network.
4. Orion is a Lifeline Utility for the purposes of the Civil Defence Emergency Management Act 2002. Orion has a statutory duty under this legislation to ensure it is able to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency.
5. The electricity distribution network is identified as “regionally significant infrastructure” by the Canterbury Regional Policy Statement 2013 and “strategic infrastructure” in the Christchurch Replacement District Plan. The maintenance of supply of electricity is a critical issue for the community.

GENERAL FEEDBACK

6. We do not underestimate the task of the Coastal Panel in developing adaptation pathways for public assets at risk of coastal hazards. The impacts of climate change are central in Orion’s planning for the future, whether planning for increased electrification generally or ensuring our assets are able to withstand the increased risks that come with extreme weather events¹. Orion is currently assessing the likely long-term impact of climate change on assets that may be affected by sea level rise and developing appropriate resilience strategies².
7. The Community objectives set in the draft plan and based on previous engagement, highlight the need to ensure important infrastructure is resilient and able to support the health, safety and wellbeing of the communities into the future. Local adaptation plans that are made with all asset types in mind and in consultation with key stakeholders in conjunction with the Council, will be key in achieving all the objectives set.
8. Applying this principle, electricity distribution has always been an essential service that underpins regional, community and economic wellbeing. Our service is vital to the wellbeing and livelihood of the people and businesses who live and operate here. As such, it should be a key consideration in formulating these adaptation plans.

¹ Orion Asset Management Plan 2024, Page 175

² Orion Asset Management Plan 2024, Page 153

9. Electricity distribution also has a critical part to play in New Zealand's transition to a low carbon economy. A report by the Boston Consulting Group highlights the role the electricity industry can play in reducing New Zealand's carbon emissions³. The increase in electrification of transport and heating will allow New Zealand to make considerable movement towards the decarbonisation goals that have been set. In order to support this, New Zealand will need electricity networks to be expanded and able to meet the changing needs of consumers. In essence, distribution will need to be widespread, flexible and reliable².
10. The inundation areas addressed by the draft plan ALL currently include electricity infrastructure that should be considered as part of the adaptation plans. For Orion to be able to continue to provide a reliable and resilient supply of electricity to these areas (and surrounding areas in some cases where the infrastructure affected is of a critical, wide-reaching nature), it will need to be able to plan in advance.
11. Changes to our network infrastructure are significant investments and can have long lag times. This means as much foresight and prior knowledge as possible of significant changes is critical. We welcome the opportunity to contribute to this consultation but consider the inclusion of electricity infrastructure should have been part of the "Important Features" specifically considered for each area.
12. Orion considers that to achieve the objective to "*ensure infrastructure, such as roads, jetties, waste, communications, electricity and water networks, are sufficiently resilient to support the health, safety and wellbeing of communities now and in the future*" further consultation with Orion, and consideration of electricity distribution infrastructure, will be required on an ongoing basis. We would welcome discussion with the Coastal Panel about these matters so that we can more fully explain how Orion makes decisions about its infrastructure and how that could impact the Coastal Adaptation programme. We also strongly encourage inclusion of electricity distribution information within the individual pathways to ensure that in the implementation phase, all relevant and important information is available and clear. We provide site specific information on each area below.

AREA SPECIFIC FEEDBACK

13. Orion has replicated the inundation and erosion modelling carried out by the Coastal Panel, to show impacts on electricity distribution infrastructure. The resulting images are provided in Appendix 1. We note that the images are the same as those supplied earlier in the year and are based on best available information to date. The information may change over time as the science develops.

³ Boston Consulting Group Report: *The Future is Electric A Decarbonisation Roadmap for New Zealand's Electricity Sector 2022*, page 200.

14. Current modelling shows that Orion's assets are exposed and vulnerable in the communities this consultation relates to. The vulnerabilities shown in each area will not always be similar or local in terms of potential effects; in some cases the lines involved are high voltage, strategic lines that feed a much wider downstream area.

Rāpaki

15. The inundation and erosion areas are likely to affect electricity poles and customer connections (both above and below ground) in the vicinity of the water's edge.
16. The protection measures proposed in respect of the beach access track, the parking area and the wastewater pumping station may also provide some protection for Orion assets that are at risk in the vicinity. Other assets that are located closer to the wastewater pipes may have to consider alternative options. Including Orion assets on the mapping and in the adaptation pathways will ensure implementation protects all lifeline utilities and critical discussions are held early.

Allandale

17. The inundation area for Allandale is likely to affect electricity poles and customer connections. There is a risk in some areas and scenarios that a strategic line will be impacted, resulting in wider impacts for communities outside the Allandale area.
18. For a majority of the Council assets located in Allandale, the adaptation pathway ultimately requires removal, closure and/or acceptance of lower levels of service. Orion will need to consider how to ensure reliability of supply is able to be maintained for customers serviced by these assets; it will be critical there is Orion involvement in decisions and planning from an early point.

Teddington

19. The inundation area for Teddington is almost certain to affect electricity poles and customer connections. Orion has already taken some remedial action in this area. There is a risk that a strategic line will be impacted, resulting in wider impacts for harbour communities outside the Teddington area.
20. Orion network is located within the road corridor of both Governors Bay Teddington Road and Charteris Bay Road. As remedial work is anticipated to varying degrees for both these sections of road, it will be important that Orion is a party to discussions and decision-making at as early a stage as is possible.

Southern Te Wharau Charteris Bay

21. The inundation and erosion area for Southern Te Wharau is likely to affect electricity poles and customer connections. There is a risk that a strategic line will be impacted, resulting in wider impacts for harbour communities outside the immediate area.
22. Similarly to other areas that are being consulted on, Orion's network is concentrated within the road reserve area. The protection and raising of the road in this area is likely to have an impact on Orion assets, therefore it will be important that Orion is a party to discussions and decision-making as early as possible.

Purau

23. Inundation and erosion in the mapped areas is likely to affect electricity poles and customer connections (both above and below ground) in the vicinity of the water's edge.
24. The adaptation pathway for the road areas of Purau (where Orion assets are primarily concentrated) involves potential for considerable change and Orion network is likely to be impacted by sea level rise even before flood proofing or alternate routes for roading are reviewed. Given the likelihood and degree of impact on Orion network, it will be important that consultation takes place early in any decision-making process to ensure reliability of electricity supply.

Koukourarata

25. Inundation and erosion in the mapped areas is likely to affect electricity poles and customer connections (both above and below ground) in the vicinity of the water's edge.
26. The adaptation pathways for Koukourarata involve moving and closing roads. As with other areas discussed above, the Orion network is primarily focused in the road reserve, any decisions to move or close roads will have an impact on Orion's ability to maintain a reliable supply for customers in these areas.

CONCLUSION

27. Orion supports the early identification of areas of potential risk for sea level rise and the preparation of options to address those risks. That said, it is important that in assessing adaptation pathways for public assets, **all** infrastructure owners and operators are consulted. A number of the proposed adaptation plans being discussed will impact electricity infrastructure and it is important the community is enabled to direct the future of their energy supply. Involving Orion at an early stage in decision-making and ensuring there is clarity and certainty in respect of the location of Orion assets in the context of the adaptation plans, will be important in the implementation phase of the draft plan.
28. Given the clear risk of impact on Orion's critical community infrastructure within the identified areas and the further risk to strategic lines feeding downstream communities, Orion seeks a collaborative approach moving forward to ensure that Council adaption plans account for all critical infrastructure and to inform Orion's adaptation plans.

Dated 14 November 2024

Address for service of Submitter:

Orion New Zealand Limited

[REDACTED]

[REDACTED]

Contact person: [REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]

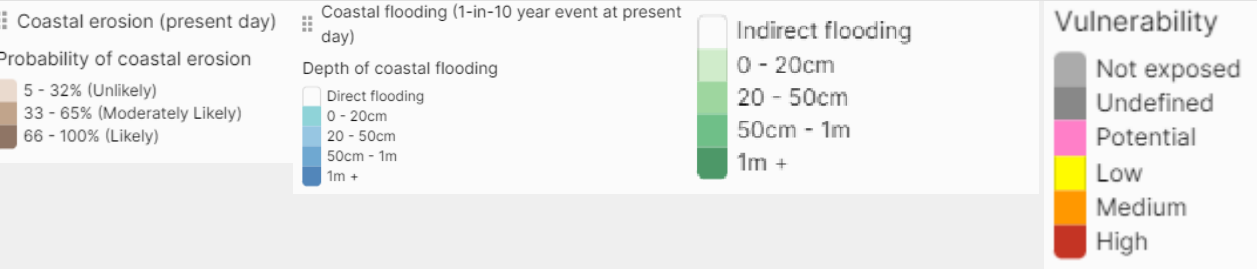
Appendix 1

Orion Submission on Christchurch City Council Coastal Adaptation Pathways consultation

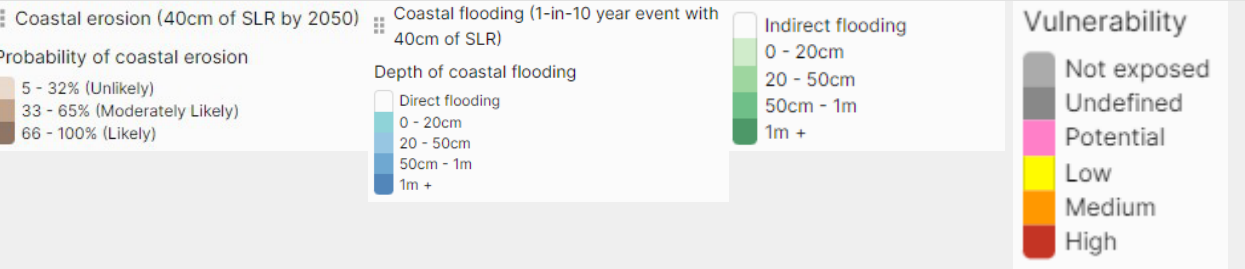
14 pages including title page

Nb. The key for the images below includes a Vulnerability category. Orion does not yet have a vulnerability assessment for many of the assets shown below and as such they are shown as “undefined”. It should not be presumed that because the assets are shown as “undefined” or “not exposed” that accurately reflects the risk to those assets; the level is likely to change when assessments have been completed. The images do accurately show the location of Orion assets within potential risk areas and are included for that purpose.

Rāpaki
current level – 1 in 10 year storm
Sea level rise and coastal erosion



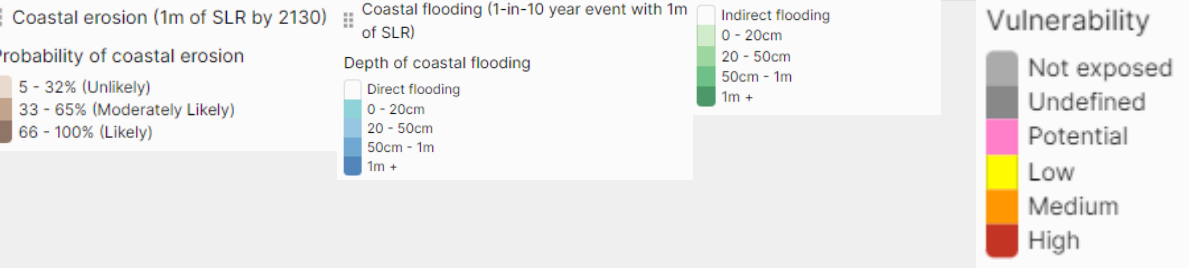
Rāpaki
40cm – 1 in 10 year storm
Sea level rise and coastal erosion



Rāpaki

1m – 1 in 10 year storm

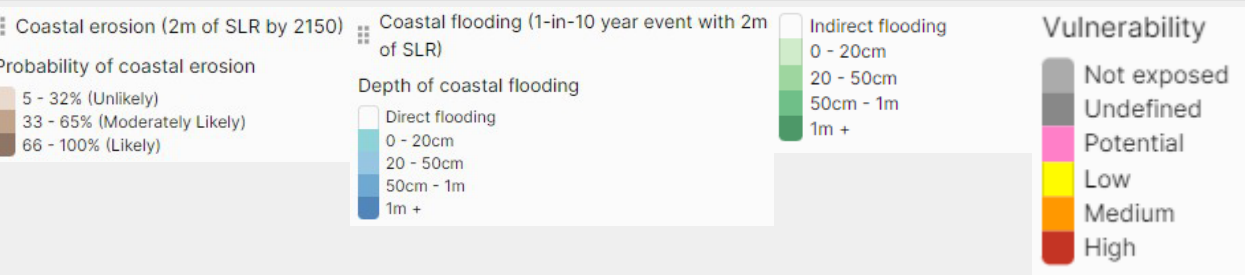
Sea level rise and coastal erosion



Rāpaki

2m – 1 in 10 year storm

Sea level rise and coastal erosion

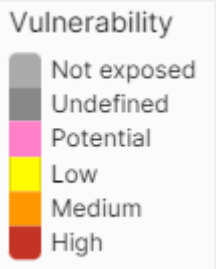
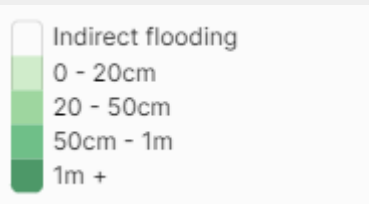
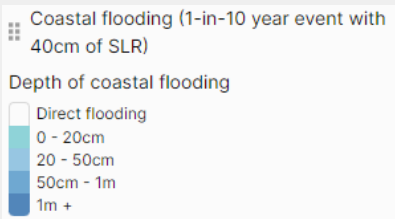
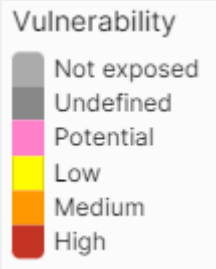
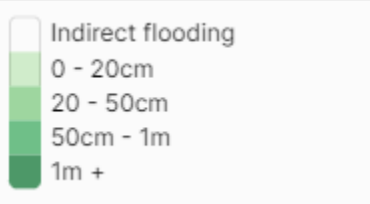
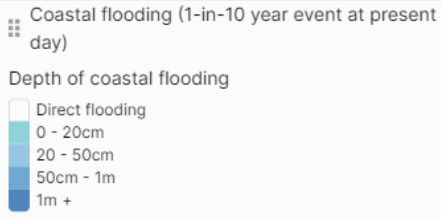


Allandale

Current level – 1 in 10 year storm
Sea level rise and coastal erosion

Allandale

40cm – 1 in 10 year storm
Sea level rise and coastal erosion



Allandale

1m – 1 in 10 year storm
Sea level rise and coastal erosion



Coastal flooding (1-in-10 year event with 1m of SLR)

Depth of coastal flooding

- Direct flooding
- 0 - 20cm
- 20 - 50cm
- 50cm - 1m
- 1m +

Indirect flooding

- 0 - 20cm
- 20 - 50cm
- 50cm - 1m
- 1m +

Vulnerability

- Not exposed
- Undefined
- Potential
- Low
- Medium
- High

Allandale

2m – 1 in 10 year storm
Sea level rise and coastal erosion



Coastal flooding (1-in-10 year event with 2m of SLR)

Depth of coastal flooding

- Direct flooding
- 0 - 20cm
- 20 - 50cm
- 50cm - 1m
- 1m +

Indirect flooding

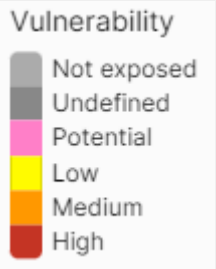
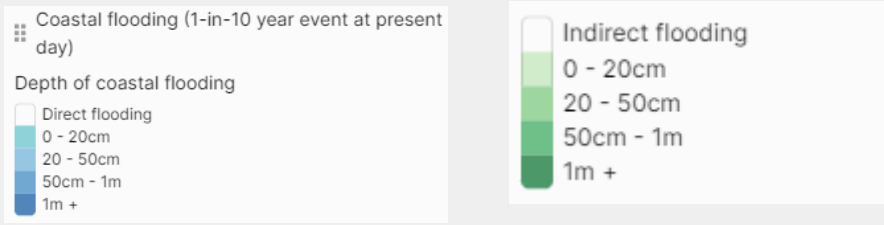
- 0 - 20cm
- 20 - 50cm
- 50cm - 1m
- 1m +

Vulnerability

- Not exposed
- Undefined
- Potential
- Low
- Medium
- High

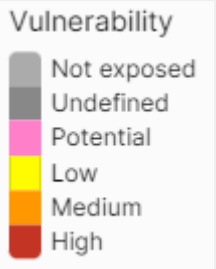
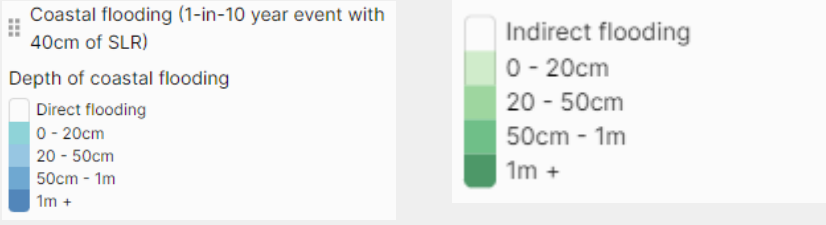
Teddington

Current level – 1 in 10 year storm
Sea level rise and coastal erosion

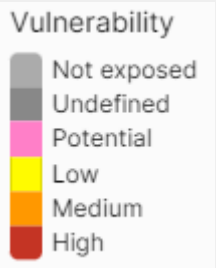
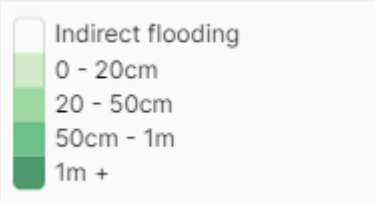
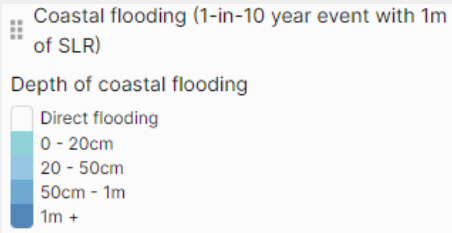


Teddington

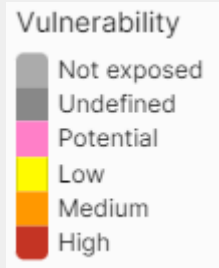
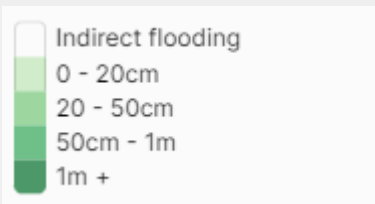
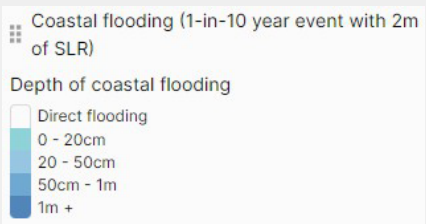
40cm – 1 in 10 year storm
Sea level rise and coastal erosion



Teddington
1m – 1 in 10 year storm
Sea level rise and coastal erosion



Teddington
2m – 1 in 10 year storm
Sea level rise and coastal erosion



Southern Te Wharau Charteris Bay
current level – 1 in 10 year storm
Sea level rise and coastal erosion



Southern Te Wharau Charteris Bay
40cm – 1 in 10 year storm
Sea level rise and coastal erosion

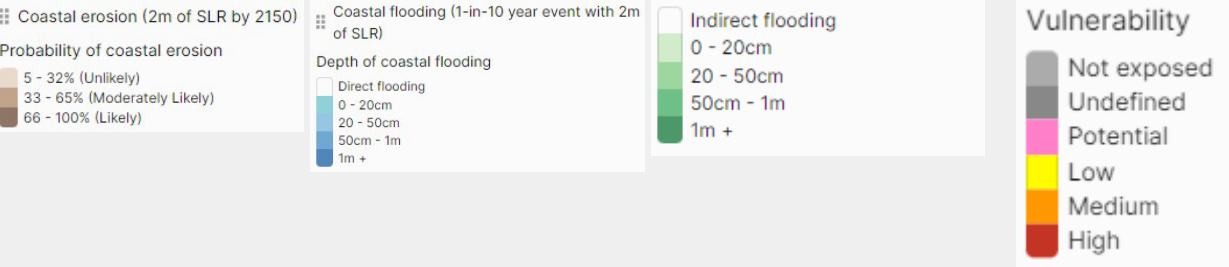
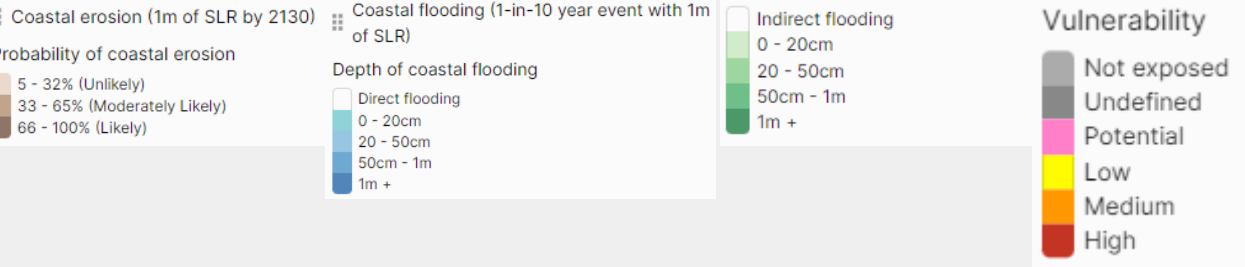


Southern Te Wharau Charteris Bay

1m – 1 in 10 year storm
Sea level rise and coastal erosion

Southern Te Wharau Charteris Bay

2m – 1 in 10 year storm
Sea level rise and coastal erosion



Purau

current level – 1 in 10 year storm
Sea level rise and coastal erosion



Coastal erosion (present day)
Probability of coastal erosion
5 - 32% (Unlikely)
33 - 65% (Moderately Likely)
66 - 100% (Likely)

Coastal flooding (1-in-10 year event at present day)
Depth of coastal flooding
Direct flooding
0 - 20cm
20 - 50cm
50cm - 1m
1m +

Indirect flooding
0 - 20cm
20 - 50cm
50cm - 1m
1m +

Vulnerability
Not exposed
Undefined
Potential
Low
Medium
High

Purau

40cm – 1 in 10 year storm
Sea level rise and coastal erosion



Coastal erosion (40cm of SLR by 2050)
Probability of coastal erosion
5 - 32% (Unlikely)
33 - 65% (Moderately Likely)
66 - 100% (Likely)

Coastal flooding (1-in-10 year event with 40cm of SLR)
Depth of coastal flooding
Direct flooding
0 - 20cm
20 - 50cm
50cm - 1m
1m +

Indirect flooding
0 - 20cm
20 - 50cm
50cm - 1m
1m +

Vulnerability
Not exposed
Undefined
Potential
Low
Medium
High

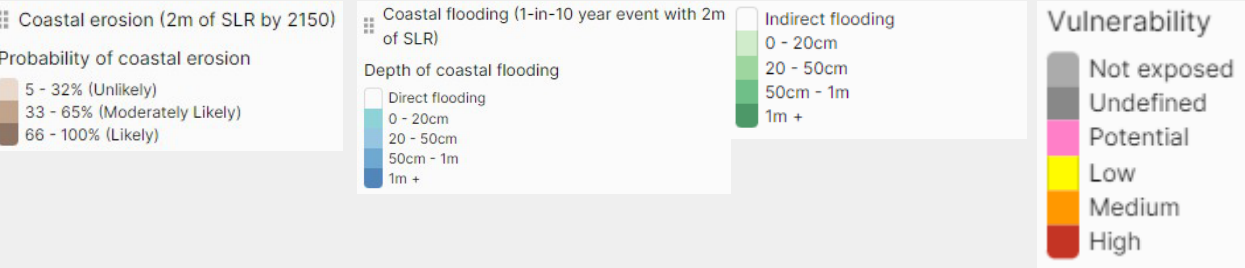
Purau

1m – 1 in 10 year storm
Sea level rise and coastal erosion



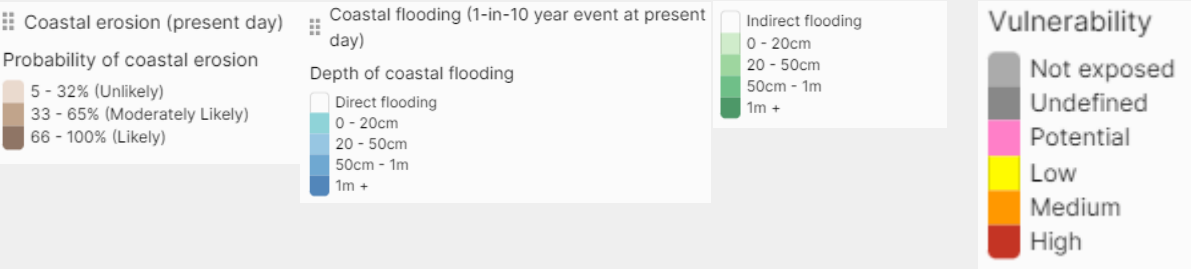
Purau

2m – 1 in 10 year storm
Sea level rise and coastal erosion



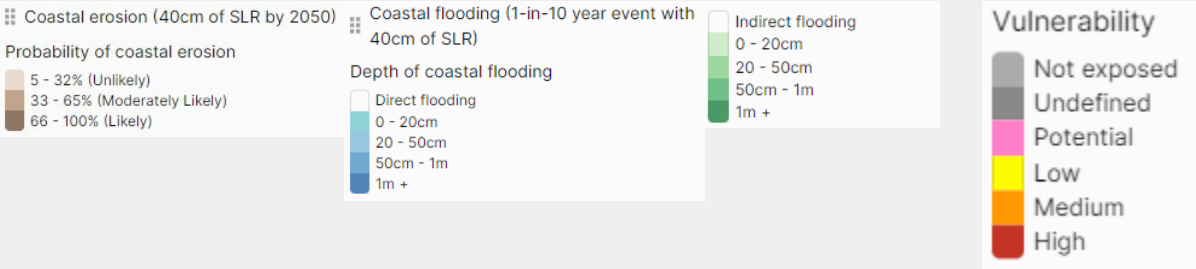
Koukourarata Port Levy

current level – 1 in 10 year storm
Sea level rise and coastal erosion



Koukourarata Port Levy

40cm – 1 in 10 year storm
Sea level rise and coastal erosion



Koukourarata Port Levy

1m – 1 in 10 year storm
Sea level rise and coastal erosion



Koukourarata Port Levy

2m – 1 in 10 year storm
Sea level rise and coastal erosion





Disabled Persons Assembly NZ

November 2024

To Christchurch City Council

Please find attached our submission on the Draft Coastal Hazards Adaptation Plan

For any further inquiries, please contact:

[REDACTED]

[REDACTED]

[REDACTED]

Introducing Disabled Persons Assembly NZ

We work on systemic change for the equity of disabled people

Disabled Persons Assembly NZ (DPA) is a not-for-profit pan-impairment Disabled People's Organisation run by and for disabled people.

We recognise:

- Māori as Tangata Whenua and [Te Tiriti o Waitangi](#) as the founding document of Aotearoa New Zealand;
- disabled people as experts on their own lives;
- the [Social Model of Disability](#) as the guiding principle for interpreting disability and impairment;
- the [United Nations Convention on the Rights of Persons with Disabilities](#) as the basis for disabled people's relationship with the State;
- the [New Zealand Disability Strategy](#) as Government agencies' guide on disability issues; and
- the [Enabling Good Lives Principles](#), [Whāia Te Ao Mārama: Māori Disability Action Plan](#), and [Faiva Ora: National Pasifika Disability Disability Plan](#) as avenues to disabled people gaining greater choice and control over their lives and supports.

We drive systemic change through:

Rangatiratanga / Leadership: reflecting the collective voice of disabled people, locally, nationally and internationally.

Pārongo me te tohutohu / Information and advice: informing and advising on policies impacting on the lives of disabled people.

Kōkiri / Advocacy: supporting disabled people to have a voice, including a collective voice, in society.

Aroturuki / Monitoring: monitoring and giving feedback on existing laws, policies and practices about and relevant to disabled people.

The Submission

DPA welcomes this opportunity to give feedback to the Christchurch City Council (CCC) on the Draft Coastal Hazards Adaptation Plan for Whakaraupō Lyttleton and Koukourarata Port Levy 2024.

Nature is core to the wellbeing of all people and is critical in keeping us emotionally, psychologically and physically healthy.¹ Disabled people value access to our coasts as it is beneficial for our mental health.² In addition to this, Māori disabled connect to the whenua through whakapapa which places an extra value on its importance. It is important to remember these things when understanding community values and connections to the coast.³

With an increasing number of disabled and older people, all councils should plan and invest in the development of fully accessible, inclusive communities. Navigating shorelines and coastlines can be difficult or even impossible for many disabled people. It is important for the CCC as part of its coastal management plan to ensure that accessible places and spaces are created that can include disabled people.

Climate change disproportionately impacts disabled people and older people.⁴

Nevertheless, disabled people are making an impact on how this is tackled through acting as agents of social change by identifying areas of importance to our communities.

DPA has made submissions to other councils around the country on their coastline and coastal reserve management plans. In this submission, we make

¹ Mental Health Foundation UK. (2021) *How connecting with nature benefits our mental health*. <https://www.mentalhealth.org.uk/sites/default/files/2022-06/MHAW21-Nature-research-report.pdf>

² Mental Health Foundation NZ. (2018). *Survey shows strong link between time spent in nature and positive mental health*. (<https://mentalhealth.org.nz/news/post/survey-shows-strong-link-between-time-spent-in-nature-and-positive-mental-health>)

³ Jones, B., King, P. T., Baker, G., Nikora, L. W., Hickey, H., Perry, M., Ingham, T. R. (2024). Karanga rua, karanga maha: Māori with lived experience of disability self-determining their own identities. *Kōtuitui: New Zealand Journal of Social Sciences Online*, 19(1), 45–64. <https://doi.org/10.1080/1177083X.2023.2224422>

⁴ Stein, J.S., Stein, M., Groce, N. & Kett, M. (2023). The role of the scientific community in strengthening disability-inclusive climate resilience. *Nature Climate Change* 13, 108-109. https://www.nature.com/articles/s41558-022-01564-6.epdf?sharing_token=WG7FDlwXm9EdrpxLpip75tRqN0jAjWel9jnR3ZoTv0OID0JqJ93tTQjFULmdry3BVlmuGxD5onmsJt996nkMEGAr2tCBsveYWZXhgtD709bHCKwbcstWptPivtOz4U34R-phYAWegIdvEDGs0fzjPHcHM0ng8l0DWlJe7vQzL10%3D

recommendations for accessibility improvements for Whakaraupō's Lyttleton's and Koukourarata's Port Levy's shorelines, especially in areas which will need to be changed to manage potential coastal erosion, inundation and flooding events.

Koukourarata Port Levy and Lyttleton Whakaraupō have the additional challenge of needing to plan for seismic risk, something that became evident in the Canterbury earthquakes of 2010-11 which significantly impacted on many coastal parts of Lyttleton and Port Levy. This earthquake saw accessibility to parts of Lyttleton and its shorelines impacted for months.

DPA recommends that the CCC make the principles of inclusion, access and co-design a high priority in the coastal reserves management plan for Lyttleton and Port Levy. This means that all changes to buildings, facilities and assets are considered with an accessibility lens in mind.

Our submission will make some general and specific points about the need for accessibility and inclusion to be incorporated into planning for the management of Lyttleton's and Port Levy's changing coastline.

Recommendation 1: that the CCC make the principles of inclusion, access and co-design with disabled people a high priority in the refreshed coastal reserves management plan.

DPA acknowledges the objectives determined by the communities of Lyttleton and Port Levy which form the basis of this plan:

- Community and resilience
- Community and culture
- Infrastructure
- Access to natural areas
- Environment and landscapes

The bigger picture – managing changes to assets and facilities in an inclusive and accessible way

If any assets and facilities, such as public toilets, public buildings and other facilities are moved as part of work to shift them away from vulnerable areas that the opportunity is taken for them to have accessibility improvements made and/or new facilities constructed according to universal design standards.⁵

Universal design standards are about making buildings and facilities accessible to everyone, including disabled people, across the course of their lifespan.

Also, if any areas are being reclaimed and turned into wetland and riverbank/streambank-based parks or new beach tracks that these areas are designed to ensure accessibility.

Key accessibility features along any new or rejuvenated riverbank/streambank parks or beach tracks should include signage, accessible toilets, height adjustable seating and user-friendly picnic tables, and tactile strips to enable safe navigation for blind and low vision people.

We recognise that some existing walking tracks, including for example that from Governors Bay to Allandale, will be only kept open while it is safe to do so due to growing storm damage.

When it comes to toilets, we note the proposals made to move or change public toilets at Allandale, Purau and Koukourarata. If changes are made to these toileting areas, then the need for change/relocation presents an ideal opportunity to create toilets (even temporary ones) built to universal design specifications.

Another aspect of toilet accessibility is the ease with which people can get to them. Some of our Christchurch members have visited coastal toilets where access is either on gravel or sand pathways/tracks which are often not easily navigable for wheelchair or mobility aid users.

DPA recommends that buildings and facilities are audited for accessibility in terms of assessing for internal and external barriers.

From our perspective, it is important to keep communities involved in all decisions, and this includes disabled people, about the need to close or change infrastructure like walking tracks, halls and other facilities as climate change impacts continue.

⁵ <https://www.branz.co.nz/universal-design/>

Recommendation 2: that all new facilities in and around the coastal shoreline, including public toilets, be upgraded and/or built to Universal Design standards.

Recommendation 3: that buildings and facilities are audited for accessibility in terms of assessing for internal and external barriers.

Any changes to coastlines should incorporate entry and exit points to places such as beaches and parks which can be accessed by everyone including disabled people. This can be done, for example, through the placement of sufficient mobility parking spaces, drop off points for mobility vans and service vehicles, the placement of tactile strips on and around key areas for blind and low vision people, the creation of landing points where people can rest (especially if the entry or exit is steeply sloped) and the creation of suitable footpaths and walkways down into beach and coastal areas.

Recommendation 4: that accessible entry and exit points be created throughout the coastal area by, for example, the creation of sufficient mobility parking spaces and footpaths/walkways into beaches and coastal areas.

Managing managed retreat

As climate change is now a significant threat and with disabled people being one of the most significantly impacted groups, there may be a need for building or other activity to be banned in specific areas and the possibility of managed retreat needs to be factored in.

DPA recommends if either managed retreat and/or building bans are proposed along any part of the area covered by this plan, that engagement around this specifically prioritise disabled people as one of the key population groups to be consulted with.

Recommendation 5: that disabled people be identified as a key population group for consultation on any managed retreat and building bans associated with climate change.

Civil defence and emergency responsiveness

As part of the civil defence and emergency management planning process for the Lyttleton coastal area, the needs of disabled people must be prioritised.

This means that any civil defence and emergency management plans must involve disabled people as a key co-design stakeholder group.

DPA is pleased to see that the CCC will prioritise road maintenance and other temporary works to ensure that access is maintained to any coastal community following an emergency event.

This is an important consideration for everyone, especially disabled and older people who may need to evacuate or have supplies urgently delivered to them in the aftermath of an emergency.

Recommendation 6: that disabled people be identified as a key stakeholder group for emergency planning and civil defence purposes across all of Christchurch's coastline area.

Disabled people as decision making partners

Overall, the best way to develop an effective coastal reserve management plan is through engaging with key stakeholders, including disabled people and disability organisations, as it is implemented.

Recommendation 7: that both local disabled people and disabled people's organisations be involved in ongoing planning for the future of the Lyttleton and Port Levy coastlines.

Attention:

██████████ Engagement Advisor
Te Hononga Civic Offices
at 53 Hereford Street

Dear ██████████

Combined Associations Submission on CCC Draft Coastal Hazards Adaptation Plan (CHAP)

This submission is provided on behalf of the following community Associations:

- Charteris Bay Residents Association,
- Church Bay Neighbourhood Association,
- Purau Residents Association and
- Port Levy Residents Association

and represents a high-level view of the CHAP from our combined Associations. Each association may also make its own more detailed submission.

At a high-level our feedback is as follows:

1. We would like to congratulate the council on their proactive thinking and the work achieved to date.
2. The Community Objectives (pg 15) are a critical element of the CHAP and should lead the approach to adaptation. We believe the Community and Culture and Infrastructure objectives are closely linked and that roading infrastructure provides critical community and social connectivity. We ask that the Community and Culture objective is changed as follows “Retain a sense of community, social connectivity and sense of place by recognising the importance of *roading infrastructure*, heritage, identity, community spaces (such as parks and marae) and neighbourhoods”. We elaborate on this point below.
3. The Glossary does not define ‘lower level of service’ for roading – this is considered an important definition and should be included in the Glossary.
4. The council has classified the future pathway for assets in three ways: protect, maintain, or close. We believe that there is a fourth option which needs to be considered – community partnership. Successful local examples of community partnership include the restoration of the Governors Bay and Church Bay Jetties and more recently the extension to the Diamond Harbour Medical Facility. We believe that in some cases the life of an asset could be extended through a partnership between community and council to maintain or protect the asset. The option of closing an asset, be it an access road or boat ramp, should only occur after all opportunities for community partnership have been exhausted.
5. We believe the approach to evaluation of the various proposals in the CHAP could be improved. We consider a more robust approach would be to identify at least one alternative option to each proposal and then undertake a cost-benefit assessment of each option to better understand which option is overall better for the community. This approach would enable assessment of the wider community implications of sea level rise. Any analysis of costs should also consider benefits (through a robust cost benefit analysis). This is an important point which we consider should be expressed in the CHAP. We recognise that some of the financial implications of some benefits may not be CCC costs, but to ignore these is to

miss a significant opportunity for the community. A few examples of proposals in the CHAP that do not adequately consider the benefits of alternative options are noted below:

- 5.1. Timing of the Investment to protect an asset should not be driven solely by sea level rise. In situations such as Marine Drive in Charteris Bay we believe that pedestrian safety concerns and basic maintenance will require the need to accelerate action.
- 5.2. The proposal to close access roads is intricately entwined with the decisions on managed retreat. In some cases, such as the Purau waterfront road and Wharf Road Port Levy, proposals contained in the CHAP pre-empt necessary public consultation on managed retreat and may potentially impact the opportunity for homeowners to extend the life of their homes by protecting and raising their properties.
- 5.3. The proposal for the Teddington Straight is to maintain the road at a reduced level of service. This option should be assessed alongside the alternative option of making this road more resilient by raising and/or protecting it. The first option has lower financial cost to the Council but would have major implications for the Harbour Community (see comments below).
6. We believe consideration needs to be given to extending the ferry service in the harbour. The ferry could be a critical piece of infrastructure and as such should not be omitted from the CHAP.

The priorities of our collective community are as follows:

7. Maintaining safe vehicle access and services to existing communities, homes and property – is the highest priority of our members.
8. Maintaining recreational services – is an important issue for the community.

Our more detailed collective feedback on each is as follows:

9. Access and services
 - 9.1. Gebbies Pass Road –We strongly support the proposal to maintain full access to the community through Gebbies Pass and Charteris Bay Road.
 - 9.2. Allandale and Teddington roads –We have concerns about the reduced level of service and request that the proposed reduced level of service be more clearly defined. We note that safe access (e.g. by making the road more resilient by raising and/or protecting it) will be required to be maintained 24/7 for a number of reasons including:
 - the Lyttleton Harbour contains both individual settlements and a wider harbour community that is connected by roading infrastructure. Failure to maintain a safe access around the head of the Harbour would cause the harbour community to be separated into two isolated halves should this road become unsafe to use.
 - we are in the Cashmere High School zone and it is the school bus route
 - it is a required route for oversize truck access to Port Lyttleton.
 - the Lyttleton and Diamond Harbour communities are closely connected, and vehicle access is required to Lyttleton for shift workers and other community members.
 - it is the route of choice into town for residents as it is shorter (km) and significantly quicker- particularly in peak periods.
 - it is a key route between Governors Bay and Diamond Harbour for emergency services – fire and ambulance.
 - there is only one road out in the case of a civil defence emergency, such as fire and earthquake. If Gebbies Pass is blocked and the Teddington Road is not maintained,

then we have no alternative route to get out. Heading to Port Levy to go over the Western Valley Road is not an acceptable alternative if there is a fire, it's already not well maintained and as a single lane, traffic would be slow in an emergency. The most sensible and cost-effective plan is to maintain the Teddington Road unless they upgrade roads out of Port Levy to the other side of the Peninsula, which I suspect is definitely a more expensive and riskier alternative.

- access to Christchurch via SH 75 Chch Akaroa Road can sometimes be closed due to flooding of low lying areas so maintaining the Allandale/Teddington route is necessary
- 9.3. Charteris Bay – We strongly support the proposal to maintain full road access and protect the services located under Marine Drive. However, we believe that the issue of pedestrian safety will require more immediate action as the seafront is a well-used pedestrian route.
- 9.4. Purau waterfront –We believe that the Council should, as a minimum, maintain a safe access to Camp Bay Road. This road provides access to Camp Bay farm, Pile Bay Baches and over 20 residences located on the Purau waterfront and Camp Bay Road. It should also be noted that the beaches along this section are well used in summer by both harbour residents and the wider public.
- 9.5. Port Levy Wharf road - provides the only access to residences and farms and as such is a critical piece of infrastructure. Closing this road would result in enforced retreat for local users.

10. Recreation

- 10.1. Purau jetty and ramp – We strongly support the proposal to maintain both the Jetty and Boat ramp.
- 10.2. Charteris Bay ramp – The boat ramp is a well-used facility which serves the whole community. We suspect that its popularity and level of use has been underestimated by the Council. We strongly recommend that it should be protected and maintained for the following reasons:
- it is widely used by the community and the Canterbury region on a daily basis including recreational activities, families and fishermen and has been for many years.
 - it is sheltered, not steep and has good off-street parking providing safer launching for families than other facilities.
 - it provides emergency access to the water for life saving, emergency services or for evacuation reasons.
 - it is a potential emergency access location for emergency services or for evacuation reasons.
 - it is more heavily used and usable by the wider community than the Purau Ramp and provides safe access for two boats at once, as well as safer launching for families.
 - the launch ramp is not as steep and thus safer than the Purau Ramp.
 - the CB Boat Ramp is subject to tidal limitations but these limitations should be lessened if the sea level rises (presumably low tides will become higher)
 - the CB Boat ramp has far better parking and safe parking options and has public toilet facilities.

- if the road side alongside the boat ramp is being protected by being raised then it would seem logical that the same could easily be done for the parking area at the boat ramp at the same time.
 - we believe this boat ramp should be maintained indefinitely.
- 10.3. Church Bay jetty – the jetty is well used by the community and visitors and is an example of the community partnering with the CCC when this was upgraded after the earthquakes.

We thank you for the opportunity to contribute and trust that the collective concerns of the community will be taken on board.

Submission to CCC re Coastal Hazards Adaptation Plan

letstalk@ccc.govt.nz

Attention:

██████████ Engagement Advisor

Te Hononga Civic Offices

at 53 Hereford Street.

Dear ██████████,

Purau Moorings Association (PMA) Submission on Christchurch City Council Draft Coastal Hazards Adaptation Plan (CHAP)

Background.

PMA is a long-lived organisation that has >100 members and owners of moorings and moored vessels in Purau Bay. Members are regular users of the Purau Launching Ramp and Jetty and adjacent roads (many members live in S Lyttelton communities). PMA interacts regularly with the Diamond Hbr Community Association and Purau Residents Association, especially in relation to seashore activities.

Our comments here are mostly constrained to the Purau section of the draft CHAP.

Historically, PMA has been integrally involved in design, construction/reconstruction and maintenance of the Purau Jetty since the 1970s. There are a set of photos in the PMA archive from 1996/8 when PMA volunteers rebuilt a large part of the Jetty and the dinghy launching ramp for the Banks Peninsula District Council. PMA drew up the initial design, did the work, and BPDC paid for the materials.

PMA has interacted regularly and constructively with councils over the years on the condition and state of these assets, and our members are major users.

Initial response to the CHAP.

Firstly, we are very pleased to see the overall long-term concepts and proactive thinking that has gone into the CHAP in relation to sea-level rise and congratulate the team involved in the overall plan. We are also pleased with the strength of the support for the Purau Jetty and Launching Ramp that will only become potentially more important as the effects of sea-level rise begin to bite. As stated in the plan, *they may become even more important in the future when access via the road is impacted.*

Also that they have been *well-used assets that'll need more maintenance as sea levels rise, and that in time, they'll need substantial upgrades.* PMA believes there is no question that they should be

kept and upgraded in the future as they provide public facilities for rate-payers locally and from the wider region.

The Coastal Panel's preferred adaptation pathway is to continue to upgrade and protect the boat ramp as needed.

The alternative option would be to close and remove the boat ramp. This isn't preferred because the ramp is well used and may become even more important in the future when access via the road is impacted.

PMA is pleased with the proposed maintenance and long-term plan for the Purau jetty and the Launching Ramp (with some additional details that need to be included in the plan – e.g. roadside security lights for both)

However,

- a) We are concerned about some incorrect details in the plan related to the current condition of the Ramp, that lead to
- b) Problems with timing of costs, and
- c) Although the CHAP has communicated well with affected Communities, we feel that those Communities will play a bigger active part in bringing plans such as these to fruition.

Incorrect details in the plan.

Purau Boat Ramp (P65-)

We find the pathway presented for the Purau boat ramp confused and incorrect.

Firstly, the boat ramp is seen by the Coastal Panel as important for a range of reasons. It's currently well-used and as the only significant boat ramp between Lyttelton and Port Levy it is likely to become more important in the future. We totally agree with this CHAP summary, but believe that it is becoming less well-used because of the hazards and risks that have resulted from deferred maintenance over the past years.

We acknowledge that there is some recognition of the current poor condition of the ramp by the last sentence of the summary that says - *This pathway also includes protecting the land either side of the boat ramp, to make sure people can safely access and use it during a range of tides.*

Yet the Signals and Threshold and Timing triggers have already been met for the ramp.

PMA has notified CCC Parks and Rec team over the past 3 years of eroding land and moving foreshore boulders that spill onto the ramp, the collapse of the wooden piles along one side of the ramp allowing a hazardous cross-current, ongoing flushing of material from under and between the concrete sections, the serious drop-off at the seaward end of the ramp that catches trailers, the badly pot-holed area at the top end of the ramp, and the resulting increasing unsafe overall condition that is affecting users.

PMA has raised the issues and thought that there had been collaborative discussions with senior CCC Staff, but there has been no action over the past 3 years?

CCC engineers have carried out inspections and provided the details of how precarious and dangerous the Purau launching ramp currently is.

CCC helps by water-blasting algae from the surface to make it less slippery.

PMA are Not pleased with the long delay (>10 or 25 years?) in the proposed remediation urgently required on the Purau launching ramp. Especially as it becomes the only, or most important public launching ramp between Lyttleton and Port Levy.

We recommend bringing a proportion of the fundamental remedial work required on the seaward end of the launching ramp into the initial maintenance period to sit alongside the Purau Avenue and Camp Bay roads plan - which we presume will include the road and parking arrangements for both assets.

PMA has been talking to CCC Parks and Reserves engineers/surveyors over the condition of the ramp for 2 or 3 years, including meeting on site and providing detailed drawn plans of maintenance works required to overcome current safety hazards.

Then the Timing section in CHAP states - *The first upgrades will likely be needed within the next 25 years to avoid meeting the threshold.*

And despite already exceeding the signals and threshold now, there is no allocation in the Funding/Financing table (page 79) for the next 10 years!

We recommend shifting \$750,000 into the <10 years column of the page 79 table for the Launching ramp and reducing the >10years allocation proportionally.

Purau Jetty.

In the past year a side pile of the Purau Jetty corroded through near the sea floor and fell over. This is one of four piles used to moor vessels coming alongside the Jetty. The other three piles are also corroded.

The falling pile was big enough to seriously injure any person or destroy any vessel that was in its path. It still lies on the adjacent shore.

The Signal 'condition of the wharf', and threshold 'act before the jetty becomes unsafe' have been triggered, but there has been no action.

Involvement of Community groups in maintenance of public assets.

The state of many coastal public assets that have been allowed to deteriorate through deferred maintenance by CCC until they have become hazards across the wider Region. Only when community groups have become involved have projects such as rebuilding of the Governors Bay and

Church Bay Jettys been completed on time and under budget. We will watch the Akaroa wharf rebuild with interest.

According to newspaper articles CCC spent \$23m on tidying up the Lyttelton town foreshore over the past couple of years.

We now need CCC to continue that kind of expenditure across the rest of the shores of the region so we can step up to the first 'trigger points' of the CHAP with some degree of confidence that this plan will be a model for the rest of the country, or will it be the basis for more delays in action.

Yours sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Governors Bay Community Association

Engagement Advisor
Christchurch City Council
CHRISTCHURCH

Attention: [REDACTED]

Governors Bay Community Association Submission on the Draft Coastal Hazards Adaption Plan, Whakaraupo Lyttelton Harbour and Koukourarata Port Levy

Introduction

1. The Governors Bay Community Association has sought comments from the community regarding the proposed impact of the proposed adaption pathways for the areas immediately within Governors Bay. These comments have been summarised in this submission.
2. The proposed areas that Council is planning for is
 - i. Allandale landfill
 - ii. Allandale Hall
 - iii. Governors Bay to Allandale foreshore track
 - iv. Allandale domain
 - v. A short stretch of Governors Bay Teddington Road
 - vi. The public toilet

Summary

3. Our submission addresses
 - i. Support for the proposed pathway for the Allandale landfill
 - ii. Supports – in the main – the proposed pathway for the Allandale Hall
 - iii. Greater need to protect the Governors Bay to Allandale foreshore track beyond that currently indicated within the draft plan
 - iv. Supports the proposed pathway for the Allandale Domain
 - v. Supports - in the main - the proposed pathway for the Governors Bay Teddington Road
 - vi. Supports – in the main – the proposed pathway for the public toilet
4. Governors Bay Community Association (GBCA) represents the community of Governors Bay and immediate surrounds. The GBCA works with the local community board to consider any proposal that may impact on the residents of the Governors Bay area.
5. The GBCA supports the pathway for Allandale Hall on the basis that repairs can be carried out quickly to allow the use of the asset while able
6. The GBCA considers that the Foreshore track is of greater importance than indicated in the Draft Coastal Hazard Plan and requires protection.

7. The GBCA supports the pathway for the Governors Bay Teddington Road, noting the raising of the road is of importance to maintain emergency access to the wider area.
8. The GBCA supports the pathway for the public toilet noting that a toilet is required in this area

Allandale Landfill

9. The draft preferred pathway is to remove the landfill after investigation and feasibility has occurred.
10. The Governors Bay Community Association supports the preferred pathway.

Allandale Hall

11. The Allandale Hall is a well utilised asset run by people in the community for the benefit of the wider region. It is used for local functions and as a celebration venue for people within the Canterbury region.
12. The hall is currently closed pending repairs to the floor, roof and water supply
13. The draft preferred pathway is to close and remove the hall at an appropriate point in time.
14. The Governors Bay Community Association supports the repairs to the hall to allow the hall to be used for as long as possible. The Governors Bay Community Association encourages that these repairs occur as quickly as possible in order to utilise the hall for as long as possible.
15. The Governors Bay Community Association accepts that the hall will have to be closed permanently at some stage in the future.

Governors Bay to Allandale Foreshore Track

16. The draft preferred pathway is for lower levels of service leading to full closure
17. The Governors Bay Community Association considers that the foreshore track is an asset of high importance to the community and requires protection to ensure that full closure does not occur.
18. The foreshore track was constructed using prisoner labour in the mid to late 1800's and has been an important feature of the area since this time.
19. The Foreshore track provides the only pedestrian linkage from Governors Bay jetty through to Allandale (there is no protected footpath along the road). The foreshore track is used by the residents (including children) of Governors Bay to access the area without having to walk along the road.
20. The Foreshore track is a widely used recreational asset used by runners, walkers and bikers to access the wider Banks Peninsula environment. This includes Living Springs, the Head to Head walkway and school cross countries.

21. The Foreshore track provides access for the wider public to experience the local ecology, flora and fauna. Geological formations illustrating the volcanic history of the area is immediately adjacent to the foreshore track. This area is used by local schools and universities.
22. The Foreshore track provides potential alternate access for vehicles to access the sewage pump station (via Church Lane)
23. The Foreshore track provides access to Allandale Reserve, which as noted in the draft plan, is an important area for dogs.
24. The Governors Bay Community Association considers that the foreshore track is of such importance in terms of access, history, community and wider public use, environmental and geological access and emergency use that this asset should be protected against coastal hazards.
25. The Governors Bay Community Association considers that staged raising of the foreshore track should be able to be completed by the time that 'Lower Levels of Service' threshold has been reached. The budget to carry this work out could be allowed for within the annual plans and would be partially offset by the estimated \$1 million maintenance estimate.
26. We note that the alternative to not using the foreshore track is to use private vehicles to access Allandale as there is no public transport options. This will impact on road usage and increased environmental pressure
27. With the projected rising sea levels, the continual availability of this asset is more critical in providing safe linkages with the proposed changes in Allandale Domain and the recently constructed (and lifted) jetty.

Allandale Domain

28. The draft preferred pathway is to restore the ecological value of this area through change of use (landscaping and planting)
29. The Governors Bay Community Association supports the preferred pathway.

Governors Bay Teddington Road

30. The draft preferred pathway is to maintain the road until raising of the road is required.
31. The Governors Bay Community Association notes that this road is a critical link for emergency services. Such services are likely to be required during times where coastal hazards are occurring.
32. The Governors Bay Community Association supports the preferred pathway with the comment that the raising of the road is to occur before having to accept lower levels of service.

Public Toilet

33. The draft preferred pathway is to close and remove the toilet.

34. The Governors Bay Community Association notes that the draft pathway for Allandale Domain is to change the use of this area to encourage more landscaping and planting. This is likely to include additional patronage. This will likely require toilet facilities.
35. The need for a toilet in this area is important to limit the use of the surrounding vegetation by the public.
36. The Governors Bay Community Association supports the preferred pathway with the comment that a toilet is needed in this area.

**FEEDBACK ON CONSULTATION DRAFT COASTAL HAZARDS ADAPTAION PLAN – PLANNING FOR SEA-LEVEL IRSE
IN WHAARAUPU LYTTTELTON HARBOUR AND KOUKOURARATA PORT LEVY (CHAP)**

To Christchurch City Council

Name of submitter: **Winstone Wallboards Limited (WWB)**

- 1 This feedback relates to the Draft **CHAP**, and in particular:
 - i. **Supports** the Coastal Panel’s focus on providing for the resilience of the transport network, particularly where there are a number of vulnerable sections of road that might be adapted, particularly at Teddington.
- 2 The specific aspects of the Draft **CHAP** that WWB’s feedback relates to and the reasons for WWB’s feedback are set out in **Appendix A** below.

Signed for and on behalf of **Winstone Wallboards Limited** by its Resource Management Consultants and authorised agents Resource Management Group Ltd (**Wellington**)

[Redacted signature]

Jacqui Hewson
Senior Consultant
14 November 2024

Address for service of submitter:
Winstone Wallboards Limited

[Redacted address]
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Email address: [Redacted email address]

A: INTRODUCTION

- 1 WWB welcomes the opportunity to provide feedback on the Christchurch City Council Draft Coastal Hazards Adaptation Plan (**CHAP**).
- 2 The feedback is broadly organised as follows:
 - **Summary of WWB's feedback**
 - **Statement of Interest and Background**
 - **General Feedback**
 - **Summary of relief sought**
 - **Conclusion**
 - **Detailed relief sought (contained in Appendix B)**

B: SUMMARY

- 3 WWB generally supports the Council's Draft CHAP and recognition of the risks that climate change poses to Whakaraupō Lyttelton Harbour's vulnerable public assets over the next 30 years.
- 4 WWB also supports the recognition of the Governors Bay Teddington Road are *"an important part of the wider transport network, connecting communities across the harbour with Christchurch city."*¹
- 5 WWB's key concern is that the CHAP provides for a stronger direction to ensure that the level of service for these roads are maintained, rather than maintained to a reduced level of service to ensure that the industries that rely on these roads are adequately provided for now and in the future.
- 6 The Governnors Bay Teddington Road is considered a vital alternative transport link for industrial activities, transporting good between the Port of Lyttelton and Christchurch and to the wider region, particularly in the event that the Lyttelton Tunnel is closed.
- 7 WWB seeks the following amendments:
 - a. **Amend** the map² showing 'Adaption options considered by the Coastal Panel for roads' to show both the sections of road at Allandale and Teddington as 'green' rather than 'orange' which would provide for these roads to be made more resilient, rather than maintained a reduced level of service.
 - b. **Amend** the pathway³ for Governors Bay Teddington Road to raise the road to maintain level of service.

¹Draft Coastal Hazards Adaptation Plan – Consultation Document - Page 49

² Draft Coastal Hazards Adaption Map – Consultation Document - 'Moving around the harbour in future' map on pages 18-19

³³ Draft Coastal Hazards Adaption Map – Consultation Document – 'Governors Bay Teddington Road (near Allandale Hall) 'The Pathway' page 44

C: STATEMENT OF INTEREST AND BACKGROUND

- 8 Winstone Wallboards Limited (WWB) is New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services. WWB has multiple locations throughout New Zealand, including the Christchurch manufacturing and distribution centre at 219 Opawa Road, Christchurch.
- 9 The main ingredient in WWB 'GIB' board is gypsum. WWB relies on seaborne transport to receive regular shipments of gypsum at the Port of Lyttelton, which is then transported by road to the Opawa Road site. Without the reliable supply of gypsum, production of GIB products is not possible.
- 10 Whilst the Lyttelton Tunnel provides the most efficient and effective route between the Port of Lyttelton and Christchurch, if the tunnel is closed or damaged, the Governors Bay Teddington Road is the only alternative transport route available for heavy industrial vehicles, given the road over the Port Hills are not suitable for such heavy industrial vehicles.
- 11 However, the Draft CHAP highlights that this road is at risk of future sea level rise and flooding events and therefore careful consideration of the adaptation pathways for these roads needs to be developed.
- 12 Given the overall importance of the continued supply of building products in the current housing crisis and the associated need to provide a resilient transport link between the Port of Lyttelton and Christchurch City to deliver this, it is vital that this transport link should be not only maintained but protected from coastal hazards and the effects of climate change.

D: GENERAL SUBMISSION

Key aims of the feedback

- 13 Given the housing crisis in New Zealand, the continued supply of building materials is of utmost relevance and importance to WWB as New Zealand's only manufacturer and largest marketer of gypsum plasterboard, drywall systems, associated GIB products and services.
- 14 As set out above, WWB, along with many other industries, relies on a resilient transport connection between the Port of Lyttelton and Christchurch City to ensure that seaborne materials can be effectively and efficiently be transported from the Port to the wider region and vice versa.
- 15 The principal aim of this feedback is therefore to ensure the continued operation of WWB, which relies on maintaining a heavy industrial transport link between the Port of Lyttelton and the wider region, now and in the future. This will ensure the continued supply of building materials to support residential intensification by establishing the most appropriate provisions to achieve that goal and assist the Council in implementing relevant direction from higher order statutory instruments – particularly the National Policy Statement on Urban Development 2020 (**NPS-UD**).

- 13 WWB supports the Draft CHAP recognition that the roading network within Whakaraupō Lyttelton Harbour and Koukourarata Port Levy play a vital to the wider economic community and are:

“exposed to coastal hazards....these roads provide access to communities across the harbour and are valued by industries such as the Lyttelton Port Company, forestry and farming, which all operate in the area.”⁴

- 16 WWB seeks a stronger direction to ensure that the level of service for these roads are protected and maintained, particularly where they link industries that rely on transport connections to the Port of Lyttelton. These transport links should be maintained to ensure the continued distribution of materials to and from the Port of Lyttelton are provided for now and in the future, which would better align with Policy 9 of the NZCPS.
- 17 Therefore, WWB seeks to strengthen the acknowledgment the roads play, particularly for industrial uses and amend the pathway in respect to the Governors Bay Teddington Road to ensure that the level of service is maintained, and the timing of any resultant resilience work is in an appropriate timeframe. This is detailed in [Appendix B](#).

E: SPECIFIC SUBMISSION IN RELATION TO THE REGULATORY CONTEXT

National Policy Statement on Urban Development

- 13 The National Policy Statement on Urban Development (NPS UD) directs that local authority decisions on urban development are to be integrated with infrastructure planning decisions,⁵ and that planning decisions contribute to well-functioning urban environments.⁶
- 14 A well-functioning urban environment is one in which:
- “enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future”⁷*
- 15 WWB’s Opawa Road operation provides building materials to ensure that people and communities can construct residential dwellings now and, in the future, and therefore their continued operation contributes to a well-functioning urban environment and therefore implements Objective 1 of the NPS UD.
- 16 Ensuring that Council Adaptation plan acknowledges the need to provide for a resilient supply chain transport network between Lyttelton, Christchurch city and the wider region safeguards for a ‘well-functioning environment’.

⁴ Draft Coastal Hazards Adaption Plan – Consultation Document – Page 48

⁵ Objective 6 NPS UD

⁶ Policy 1 NPS UD

⁷ Objective 1 NPS UD

New Zealand Coastal Policy Statement 2010

- 17 The New Zealand Coastal Policy Statement 2010 sets out policies in order to achieve the purpose of the Act in relation to the coastal environment of New Zealand.
- 18 The relevant policy in relation to this feedback is Policy 9, which states:

“Policy 9: Ports

Recognise that a sustainable national transport system requires an efficient national network of safe ports, servicing national and international shipping, with efficient connections with other transport modes, including by:

- a. ensuring that development in the coastal environment does not adversely affect the efficient and safe operation of these ports, or their connections with other transport modes; and*
 - b. considering where, how and when to provide in regional policy statements and in plans for the efficient and safe operation of these ports, the development of their capacity for shipping, and their connections with other transport modes”*
- 19 WWB considers that the Draft CHAP could strengthen the resilience of the roads that support the efficient and safe operation of the port and their connections with other transport modes and therefore give effect to Policy 9 of the NZCPS.

F: SUMMARY OF RELIEF SOUGHT

- 20 In summary, WWB seeks to ensure that the existing permitted activity rights the Opawa Road site which are provided for under the existing Industrial Heavy Zone are retained by the following:

WWB seeks to:

- a. **Amend** the map⁸ showing ‘Adaption options considered by the Coastal Panel for roads’ to show both the sections of road at Allandale and Teddington as ‘green’ rather than ‘orange’ which would provide for these roads to be made more resilient, rather than maintained a reduced level of service.
- b. **Amend** the pathway for Governors Bay Teddington Road to raise the road to maintain level of service.

G: CONCLUSION

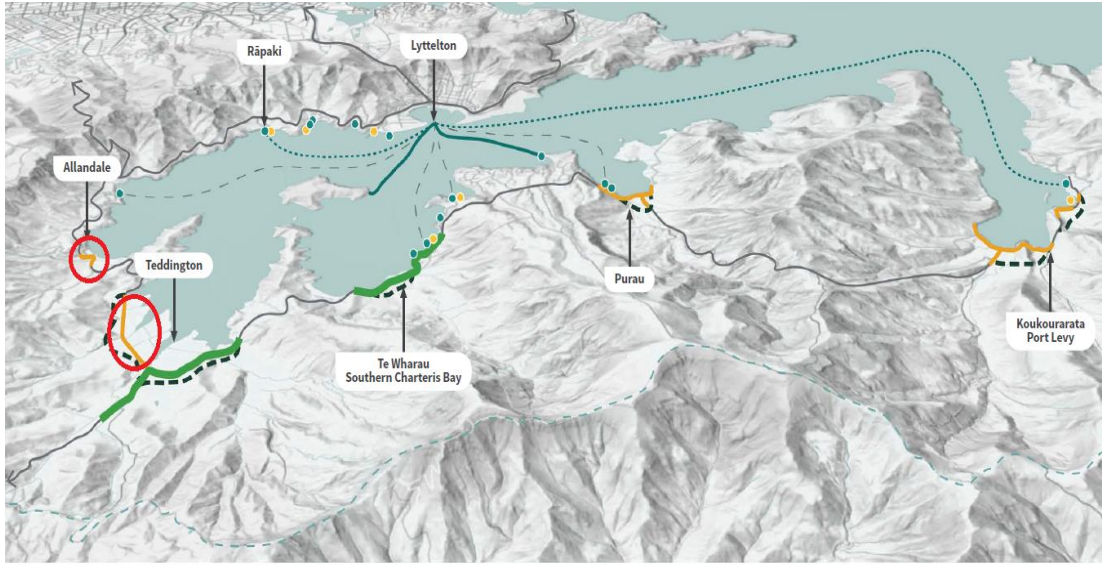
- 21 For reasons set out in this feedback, WWB generally supports the overall intent of the Draft CHAPS.
- 22 However, WWB considers that the adaption options for the roading, particularly where those roads provide a valued connection for industries that rely on a resilient road link to the Port of Lyttelton to Christchurch City, are protected to ensure the level of service is maintained, rather than reduced. This would better align with NZCPS Policy 9. **Appendix B** outlines WWB requested relief in full.

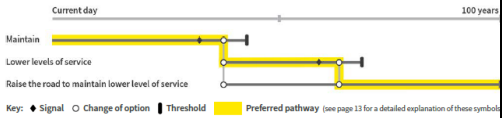
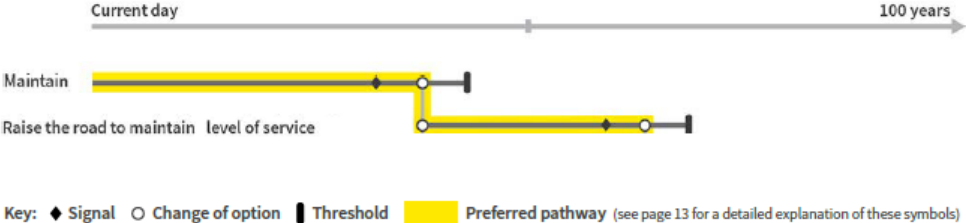
⁸ Draft Coastal Hazards Adaption Map – Consultation Document - ‘Moving around the harbour in future’ map on pages 18-19

APPENDIX B

Draft Coastal Hazard Adaption Plan – Detailed Relief

Submitter Name: **Winstone Wallboards Ltd**

Section	Specific matter	Position	Reason for Feedback	Relief sought
Moving around the harbour in future	Adaption options considered by the Coastal Panel for roads	Support with Amendments	WWB considers that showing the Allandale and Teddington roads to be more resilient by raising and/or protecting it to better align with Policy 9 of the NZCPS.	Seeks amendment to the ‘Moving around the harbour in the future’ map to the sections of road at Allandale and Teddington to show these as green rather than orange which identifies these roads as ‘It’s possible to make the road more resilient by raising and/or protecting it’ which are circled below in red.  The marine transport network - Existing ferry routes - Lifeline routes - Recreational boat (and other watercraft) routes - Existing public wharf, jetty or boat ramp - Existing private wharf, jetty or boat ramp Adaptation options considered by the Coastal Panel for roads - It's possible to make the road more resilient by raising and/or protecting it. - It's possible to maintain the road at a reduced level of service. - It's possible to move the road further inland. (These lines are indications only and not meant to show exactly where roads would be moved.) - Possible road routes that were investigated but not considered possible. - Existing road connections. See which of these options are part of the Coastal Panel's preferred pathways later in the document.

Section	Specific matter	Position	Reason for Feedback	Relief sought
Teddington	The overarching story, page 48	Support with amendments	WWB considers that the critical nature the roads play for industrial uses needs to be highlighted and direction to protect them strengthened.	Amend to read: <i>“There are three major roads exposed to coastal hazards in Teddington: Governors Bay Teddington Road, Gebbies Pass Road and Charteris Bay Road. These roads provide <u>critical</u> access to communities across the harbour <u>and connection to the wider transport region</u> and are valued by industries such as the Lyttelton Port Company, forestry and farming, which all operate in the area. <u>Therefore, maintaining the level of service is vital</u>”</i>
Adaption planning for communities	The Pathway for the Governors Bay Tedding Road	Support with amendments	WWB considers the pathway for the Governors Bay Teddington Road should be strengthened to ensure that the roading levels of service are maintained, rather than maintained to a lower level of service, which is better aligned with Policy 9 of the NZCPS. Governors Bay Teddington Road (near Allandale Hall) The pathway The diagram below shows the preferred pathway through the adaptation options of maintaining the road, reducing its levels of service or flood-proofing it. 	Seeks amendment to the pathway as shown below to ensure that raising the road to maintain the existing level of service is the preferred pathway for this road. Governors Bay Teddington Road (near Allandale Hall) The pathway The diagram below shows the preferred pathway through the adaptation options of maintaining the road levels of service flood-proofing it. 

Submission on the Coastal Hazards Draft Adaption Plan

To: Christchurch City Council
53 Hereford Street
Christchurch

Attention [REDACTED] Engagement Advisor

Email: letstalk@ccc.govt.nz

Submitter: Carolyn Mary Craw [REDACTED]

Address for Service: [REDACTED]

Wish to be Heard: No, I do not wish to be heard in support of my submission.

INTRODUCTION

1. I live at [REDACTED] I have lived in Port Levy since 1984 (ie 40 years) when my husband and I brought a 1,000 acre farm at Wharf Road.
2. Firstly, I would like to point out that I am one of the people who is part of the group submission that has been filed by the Wharf Road, Port Levy residents. Obviously, I fully endorse the approach that has been taken in that submission. However, I wish to raise other points that are personal to me and not necessarily common to the group of submitters.

Concerns with Proposed Potential Recommendation to close Wharf Road

3. These concerns may be summarised:
 - a. The approach taken in the draft plan potentially creates a huge rift between one side of Port Levy and the other. Why does one side potentially benefit by allowing for relocation of their access road and ongoing access when the other doesn't? Is this an attempt by Council to "divide and conquer" the residents who live in the bay?
 - b. It is of fundamental importance to a resident and any ratepayer that the Council provide access to the property they own or live at. The dwelling on the property I live in at [REDACTED] is at least 80 metres above sea level. There is never any risk of it being subject to flooding from sea level rise. There has also never been flooding from other extreme rain events of the house I live in (unlike other parts of the Peninsula that have experienced devastation from flooding).
 - c. I am aged 84 years old (85 in December). If access is not available to the house I live in, then the Fire Service would be unable to deal with any fire where I live. Also, I would be unable to receive emergency assistance from an ambulance should I get into extreme health difficulties. Things like this potentially keep me up at night - it is wrong and poses a risk in that my health needs in an emergency could not be met. This would put me at risk, without being dramatic, of dying if emergency access via is not available. It would also mean that I would likely be denied insurance cover for the house I live in, that as mentioned, is never at risk of sea level rise.
 - d. If the road was closed, my family from outside Port Levy would be unable to visit me. It could also mean that I potentially must go into rest home care, something which I never wanted to do unless it was absolutely necessary.
 - e. I have never been approached or consulted by anyone in the Council or anyone else on the panel for the plan about the proposal. If I had been approached, I would have made it very

clear that there needed to be at a minimum, alternatives to the closing of Wharf Road, so that access can continue to be provided.

- f. The failure to consult is in itself in my view fatal to the recommendation that has been made. How can a recommendation be made where there has been no actual consultation with the people who are affected by the proposal?
- g. In summary, I think the Council needs to start again in relation to Wharf Road. There needs to be a proper process where residents are consulted and their voices heard and alternatives considered and advanced before any recommendation was made. I note this was effectively the unanimous resolution at the Port Levy Residents Association meeting I attended about the Plan on 10 November 2024.

4. Relief Sought.

As mentioned the Council has failed to consult with any residents of Wharf Road and any other directly affected parties. In my view, the plan is flawed and the part that relates to Wharf Road should be withdrawn or decided on a later date once a proper consultation and investigations have been undertaken.

Carolyn Mary Craw

14 November 2024