

Friday 31 January 2025		
Time	Name	Submitter Number
9.30am	Staff presentation	
10.05am	Hazel Bourne – Next Generation Conversation	29669
10.10am		
10.15am	Jill Rice – Purau Residents Group	29765
10.20am		
10.25am	Margie Newton – Port Levy Residents Association; Peter & Margie Newton, as individuals.	29933
10.30am		
10.35am	Angie Rayner – Governors Bay School	28398
10.40am		
10.45am	Asif Hussain – Te Pātaka o Rākaihautū Banks Peninsula Community Board	29527
10.50am		
10.55am	Karl Dean – Fed Farms; via <i>Audio/Visual</i> Link	29949
11.00am		
11.05am	Lloyds Scully – Wharf Road, Port Levy Residents	29930
11.10am		
11.15am	Phillip & Jane Helps	29952
11.20am	Graeme Fraser – Diamond Harbour Community Association	29621
11.25am		
11.30am	Break – 15 minutes	
11.45am	Dinah Wallis – Lyttleton School	29622
11.50am		
11.55am	Barry Blatchford – Teddington Quarry	29784
12.00pm		
12.05pm	Brett King	29572
12.10pm	Eric Holmberg	28645
12.15pm	Mark Chandler	29548
12.20pm	Graeme Finlay	29792
12.25pm	David Carter	28634
12.30pm	Lunch – 45 minutes	
1.20pm	Clare & Richard Barnett – Kaihope Farm	29936
1.25pm		
1.30pm	Tui Scott	29708
1.35pm	Susan Thorpe	29799
1.40pm	Keran Tsering	29396
1.45pm	Annabel Barnett	29479
1.50pm	John Craw	29934
1.55pm	Ian Macintosh	30223
	No longer wish to speak:	
	Andrew and Wendy Oh	
	Ian Flatley	
	Martin Jay & Verity Scarlett	
	Denise Kidd	
	Tony Kidd	
	Phil Brown	

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

Organisations / Businesses who 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
29527	Yes	See attachment - Page 11 Overall feedback This submission aligns with the following Board priorities: ‘Proactive planning for climate change’. The Board is committed to actively engage in the Coastal Hazards Adaptation Plan process to support those communities most affected by sea level rise and to advocate that climate change adaptation and resilience planning includes climate mitigation measures, so that adaptation activities do not contribute to climate change. ‘Good social and physical connections for our communities.’ The Board is committed to supporting improved walking tracks and pedestrian linkages, including connected walkways to enable children to safely walk to school. ‘Work with all relevant parties to support healthy harbours and bays.’ The Board supports the Whaka-Ora Healthy Harbour programme of work to restore the ecological and cultural health of Whakaraupō Lyttelton Harbour as mahinga kai. ‘Improve infrastructure to support community resilience’ The Board is committed to working with staff to review levels of service for rural roads and marine structures in light of increased frequency and intensity of storms. Specific area feedback Rāpaki Jetty/wharf infrastructure for all areas. It will be important for residents to have alternative transport options in the event of flooding/inundation/earthquake preventing access via vehicle. The Board would like to ensure that the maintenance and improvement of existing jetty/wharf infrastructure be prioritised in future planning. Allandale Governors Bay to Allandale Foreshore Track: The Board wishes to advocate for ongoing maintenance and defense of the Governors Bay to Allandale foreshore track. This heavily used track is of extremely high value to the community for the following reasons: - It is the only flat area in the locale for people to run, walk and cycle and is used daily by many. - It is where children can learn to ride their bikes and mothers can push a pushchair. - It is accessible for those with limited mobility or who are restricted to a wheelchair. - Young children from Allandale use the track to bike to school in Governors Bay as a much safer option than taking the road. - Children walk the track between Governors Bay and Allandale to socialise with friends. - It is used by walkers, runners, older residents, cyclists, families, tourists and dog-walkers. - There is no alternative safe route as there are no footpaths between Governors Bay and Allandale, and the roads are too narrow and hilly to accommodate shared use footpaths adequate for all of the above activities. - The loss of this track will be significant for the community. The Board also supports upgrades to the existing Allandale to Governors Bay Road to enable pedestrian use. Allandale Hall: The consultation document notes that the Allandale Hall will be affected by sea level rise and will likely need to be removed at some point in the next 50 years, or sooner if not repaired. The Board considers the hall to be a viable and much valued community facility and strongly supports the full repair and re-opening of the hall to benefit the community for the next 40 to 50 years. Allandale Landfill Removal: The Board supports removal of the Allandale landfill site and future protection of the area to ensure the future ecological health of the harbour.	Lyn Leslie, Chairperson - Te Pātaka o Rākaihautū Banks Peninsula Community Board

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		Teddington Governors Bay-Teddington Road: The Board supports the ongoing maintenance of the Governors Bay – Teddington Road, however, believe the term ‘reduced level of maintenance’ is causing concern in the community and suggest a change of wording to clarify that this does not mean less maintenance. This road is an important daily transit route to Christchurch for many residents of the area, whether it be for work, sport, medical treatment or school. Travelling to central Christchurch via Gebbes Pass will add approximately 30 minutes to travel time one way; a huge cost increase in terms of time and fuel for Mt Herbert communities and a potentially costly delay for fire and emergency services. The Board would like to see a cost-benefit analysis between raising the Governors Bay-Teddington Road as opposed to the realignment and widening of Gebbes Pass, taking into account that assessment of Gebbes Pass as the main route should include costings of continued ongoing low-level maintenance of the Governors Bay-Teddington Road. Additionally, the Board would like confirmation of a commitment from Waka Kotahi NZTA to maintain SH75 to a high level to accommodate the expected additional load in future.	
28398	Somewhat	See attachment - Page 14 Overall feedback There are some things we really like, like the marine transport network. And some of the other things we partly agree with but would like of the things to be done quicker or for longer. Please refer to our specific and attached feedback. Specific area feedback Allandale THE GOVERNORS BAY FORESHORE TRACK Summary of our collective and agreed views We really value the track and use it a lot, as do visitors to our community. The track is part of who we are. Therefore, although we accept that it will flood and erode more and more and, at some point, it will need to close, we do not agree with your current preferred pathway between now and then. - Firstly, we are unsure about what ‘lower levels of service’ will look like. This needs to be explained, because you want to do this within the next five years. Does it mean we won’t be able to use it as much? - We noticed in your preferred pathway, that after about 30 or so years, you will go straight to closing the track and not even trying to maintain or protect it. - We would prefer that between now and the threshold of closing it, that you consider protecting the track - But whatever you do, ensure all other living things are considered and protected as part of the approach. The Governors Bay Teddington Road Summary of our collective and agreed views We agree that the road needs to be maintained and with the general direction of your preferred pathway, but we do wonder how you will manage the lower levels of service. - However, we think you should act on the threshold of raising the road, or even moving it, earlier. - Our preferred pathway is to maintain for about 30 or so years and then go straight to raising (or moving it) in about 40 or so years, bypassing the lower levels of service option. - But whatever you do, ensure all other living things are considered and protected as part of the approach.	Angie Rayner, Teacher - Governors Bay School Yr 6-8 students/class
29622	Somewhat	See attachment - Page 16 Overall feedback As children and young people and residents of Te Whakaraupō and from the Nature Ranger's team at Lyttelton Primary School, we believe the decisions being made now will impact us and our children the most. Therefore, we appreciate the opportunity to provide feedback on the Draft Coastal Hazards Adaptation Plan for Te Whakaraupō Lyttelton Harbour and Koukourarata Port Levy. As the Council’s Draft Coastal Hazards Adaptation Plan is not currently focusing on Lyttelton itself, we considered 1. Whakaraupō in general, providing feedback on how coastal hazards may impact the things we value and what we would like to happen to protect and maintain them	Dinah Wallis, Teacher - Nature Rangers Team (Yrs 7/8) Lyttelton Primary School

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

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		2. The Marine Transport Network. You will find our feedback attached and reasons why, although we support a lot of what is planned, we also have questions and concerns.	
29669	Somewhat	See attachment - Page 18 Overall feedback SUBMISSION from Next Generation Conversation (NGC) Next Generation Conservation (NGC) is a group climate change advocates aged between 11 and 16 living in Ōtautahi/Christchurch. We have a strong interest in climate change and meet regularly to discuss policy issues and seek opportunities to engage with and influence decision makers. As a collective, we wish to provide the following points as a submission to Council's Draft Coastal Hazards Adaptation Plan - Planning for sea-level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy. Some of us live in the area, but numerous of us do not. However, we all value the Whakaraupō and appreciate the opportunity to provide feedback. We also believe it is beneficial to collaborate and learn from this first engagement as communities across the city and nation begin their own conversations and planning. Ensuring the community is openly encouraged to share their views now but also as the plan is implemented is incredibly important to us. This includes ensuring there is a diversity of opinions that reflects Whakaraupō needs and wants, now and into the future. We want to make sure that whatever plan is agreed on, it reflects the majority of the community's needs and wants. Our collective feedback As a group, we have three key feedback themes • Nature Preservation • Planning: Short and long term • Transport: Roothing, the Marine Transport Network and alternative routes You can ready our feedback on these themes in the attached submission. Thank you.	Hazel Bourne, Member - Next Generation Conversation
29621	Somewhat	See attachment - Page 21 Overall feedback We support efforts to protect the infrastructure which we rely on. We are just not sure that the stated preferences are the right way to do this in some locations. Specific area feedback Teddington Please see the attached submission of the Diamond Harbour Community Association. Te Wharau Charteris Bay Please see the attached submission of the Diamond Harbour Community Association. Puaru Please see the attached submission of the Diamond Harbour Community Association.	Graeme Fraser, Chair - Diamond Harbour Community Association
29765	Somewhat	See attachment - Page 24 Overall feedback We need to prepare for future changes but our community is not in agreement with all of your proposals. Specific area feedback Purau See attached document.	Jill Rice, Chair - Purau Residents Group
29933	N/A	Specific area feedback Koukourarata Port Levy This submission is on behalf of the Port Levy Residents Association. (PLRA) I am Margie Newton, the chairperson of the PLRA.	Margie Newton, Chairperson -

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		On Sunday evening the 10th of November a meeting was held in Port Levy for residents to discuss the draft of the Coastal Hazards Adaptation Plan (CHAP) and the proposals in it for Port Levy. 24 residents attended. The meeting started with residents expressing their opinions for and against various elements of the draft plan but the focus was certainly on the plan for Wharf Road and it's eventual closure as sea level rise impacts the coastline. All of the residents of Wharf Road were present and they each expressed their horror at the utter disregard for their homes, livelihoods, businesses and family properties that this proposal indicates. They were particularly angry about the lack of consultation regarding this drastic action, especially considering the huge impacts it will have on their and their families lives. There was also concern voiced over the unfair distribution of proposed funding for the asset protection in Port Levy, ie that \$35 million has been allocated to protect, maintain or relocate Pa and Fernlea Rds, the Wharf and the public toilet but \$0 are allocated to Wharf Rd. Residents felt there appears to have been no investigation in to alternative options for Wharf Road, other than closure. Nobody has conducted research in to moving the road further inland as has been planned for Pa and Fernlea roads if the need arises. Nobody has investigated coastal planting of the foreshore to slow erosion. Nobody has collected data regarding the traffic using Wharf Road versus other roads not destined for closure. Nobody has considered shoring up the vulnerable 400 metres of Wharf Rd to protect it from sea level rise for at least some time. The draft CHAP simply states " high costs and environmental impacts", along with " a low number of people using the road" have meant no alternatives have been considered. Residents felt this to be completely unreasonable as there is no data to back up these claims. Therefore the meeting concluded with the resolution as follows: "That the PLRA, on behalf of the residents, request that council commence consultation with all residents and conduct further investigation and research into alternative options for Wharf Road in the Coastal Hazards Adaptation Plan." This resolution was seconded and passed unanimously. The meeting was unable to come to agreement on a resolution to support any other part of the CHAP.	Port Levy Residents Association
29930	N/A	See attachment - Page 26 and 33 Specific area feedback Koukourarata Port Levy See attached.	John Crow, Spokesperson – Group of Wharf Road residents, Port Levy
29949	N/A	See attachment - Page 41 Specific area feedback Koukourarata Port Levy See attached.	Karl Dean, President, North Canterbury Province - Federated Farmers
29784	Somewhat	Overall feedback See further down for detail Specific area feedback Allandale Allandale landfill - this is smaller than shown and work has already been done on retentions of the front of it. Longtime local residents should be consulted on the detail The foreshore track could easily be raised - it and the Allandale domain are of significant recreational importance to the Governors Bay Community Allandale Hall should be opened immediately as this is the only hall of this size in the harbour and it should stay open as long as possible. Allandale road should be maintained at its current standard and if raised if necessary. See more notes in Teddington section. Teddington This is a main thoroughfare for all the residents and is of significant importance for oversize vehicles to and from the port, log cartage to the port and emergency services and it needs to maintained at least at current levels for ongoing economic activity.	Barry Blatchford, Quarry Manager - Teddington Quarry Ltd

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		The Blatchford family have owned and run the Teddington Quarry since the 1950s. The quarry also manages the only consented clean fill operation in Lyttelton harbour. There is a significant amount of rock uphill from the present quarry and using local rock in the future will significantly reduce proposed costs by millions of dollars. This business requires the road to be maintained to ensure that trucks and trailers have access at all times. Te Wharau Charteris Bay The proposal about the road, water and sewerage are sensible. The boat ramp could be raised at a significantly lower cost than proposed.	
29936	N/A	See attachment - Page 47 Specific area feedback Koukourarata Port Levy See attachment	Clare & Richard Barnett, Owner - Kaihope Farm
29943	N/A	See attachment - Page 51	Phil Brown, Associate Planner SLR Consulting New Zealand - Fuel Companies

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Individuals who 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
28483	Somewhat	Overall feedback I think most of the plan is great but there are a couple of areas I would want changed. Mainly this relates to Purau but keen to also retain Governors Bay / Teddington road Specific area feedback Purau raise the road along shorefront of Purau Avenue, Camp Bay Road and Purau Port Levy Road, ie 1B option. Good to turn reserve and playground in to nature reserve. Good to move public toilet to higher location. Good to retain jetty and boat ramp	DENISE KIDD
28485	Yes	Overall feedback Sea level rise is inevitable and we think council should plan for it. Specific area feedback Purau We live one row back from the beach and would like to maintain road access to our property. We would prefer the existing road access to be protected.	TONY KIDD
28645	No	Overall feedback As one of the "very few" residents in the Allendale area, I am concerned about the "lower levels of service" for the Governors Bay Teddington Rd proposal. Driving into Christchurch has been fraught with delays over the past 3 years due to construction closures on Dyers Pass and unannounced road closures of either Dyers Pass, Governors Bay Road, or Governors Bay Teddington Road. The closures were often not listed on either NZTA or the Christchurch City Council website and the schedules for planned closures changed constantly resulting in having turn around and final alternate routes. Given this context, a "lower level of service" is could imply that the roads would be closed for days at a time on a regular basis completely isolating the residents in the area. Specific area feedback Allendale The plans should be changed to raise Governors Bay Teddington Road to make it more resilient since it is used not only by the "very few" residents of the Allendale area, but also by emergency services from Governors Bay, residents of the Charteris Bay area, and Living Springs. In addition, the road has a large amount of heavy vehicle traffic from the port of Lyttelton for oversized loads that cannot use the Lyttelton Tunnel. Teddington A lot of traffic from Christchurch to Charteris Bay uses Dyers Pass, so it does not make sense to only improve the Dyers-Pass-to-Charteris-Bay route. In addition, the Governors Bay Teddington Road length is less than 25% of the length of the proposed Charteris Bay improvements.	Eric Holmberg
29396	Somewhat	Specific area feedback Teddington A failure to maintain and protect the Governors Bay to Teddington Road section essentially cuts the Lyttelton Harbour community in two, creating a significant barrier to the livelihoods, growth, and unity of those who live there now and those who will contribute to its future. This road, together with Gebbies Pass and Charteris Bay roads, is a vital artery for connectivity within this unique harbour-based community. Allowing this critical section to deteriorate not only disrupts daily life but stifles future development and the preservation of the harbour's distinctive cultural landscape. One of the most immediate and concerning impacts is the threat to historic and community resources. Located at 554 Governors Bay Teddington Road, the intersection with Gebbies Pass Road, stands a long-standing and culturally significant building. This building has recently been revitalized, now housing New Zealand's first authentic Tibetan restaurant and a Buddhist cultural centre, providing a unique gathering place and invaluable resource to the community. This establishment is one of only two historic destinations in the area that has been carefully restored to serve as a community hub, celebrating and preserving the area's history while fostering growth and cultural exchange. Proposals to either neglect the Governors Bay to Teddington section or only elevate Gebbies Pass Road pose serious threats. Not protecting this essential section will lead to permanent flooding, effectively destroying this cultural site by transforming it into a water feature. This would irrevocably damage not only a treasured landmark but also the	Keran Tsering

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		harbour community's collective identity and growth prospects. Any approach to harbour infrastructure must include strategic planning to protect both the livelihoods of residents and the area's distinct cultural assets, fostering a resilient and connected community for the present and future.	
29479	No	Specific area feedback Koukourarata Port Levy Port levy roads service families, businesses and recreational assets. these families and businesses pay taxes and rates and deserve for the road to be continued to maintained to be usable for the viable road. Port levy Wharf Road has several businesses including farming and tourism operations and brings income and visitors to the community but not having access via wharf road these properties, businesses would cease to exist. Further consultation with actual affected members is essential before committing to any other plans in regards to coastal hazards	Annabel Barnett
29488	No	See attachment - Page 56 Overall feedback My wife and I have read the document Draft Coastal Hazards Adaptation Plan when obtained recently. Prior to this we had failed to understand what Council meant in its emails aimed to us via our residents association community contact that talked about "vulnerable assets". This terminology meant nothing to us and we assumed it was limited to things like protecting council pumping stations for sewerage and water supply networks near the sea. It never occurred to us that if Council was consulting on things as meaningful as how residents would continue to have access to their properties via the current roads that they would not state this plainly in the communications. Having read the proposal to effectively over time abandon Wharf Road and its residents in Port Levy we find ourselves unable to support the plan overall. We want to applaud the fact that there is some forward thinking and a proposal to allocate spending but this is overshadowed by the severe inequity in the treatment of Wharf Road residents as a single isolated group under the plan to such an extent that we cannot support the plan as it stands. Specific area feedback Teddington We support the attached document "Combined association submission on CCC Draft Coastal Hazards Adaptation Plan (CHAP)" which we believe is aligned with our interests as resident of the area. Te Wharau Charteris Bay We support the attached document "Combined association submission on CCC Draft Coastal Hazards Adaptation Plan (CHAP)" which we believe is aligned with our interests as resident of the area. Purau We support the attached document "Combined association submission on CCC Draft Coastal Hazards Adaptation Plan (CHAP)" which we believe is aligned with our interests as resident of the area. Koukourarata Port Levy We agree that a substantial sum of money should be set aside for Port Levy. We do not agree that all the prioritised assets are the only thing that money should be spent on. If there is no cap on the money being spent then great lets have all those things, plus lets have some other spending. If there is a cap on the money being spent in total then we would like to see this be more evenly spent for all residents of Port Levy and just exclusively those that live beyond the Wharf Road intersection.	Peter and Margie Newton
29548	No	Overall feedback Methodology of the whole project is wrong. This plan has come first i.e it is the end product. We need firstly to identify wider key assets that need protection for successful implementation of a plan. CCC need to consider the ferry terminal, roading and access to local materials i.e rock so as to plan for successful outcomes rather than inevitable failure. What I would rather see is what we can afford and how that can be implemented. Specific area feedback	Mark Chandler

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		Teddington It is unacceptable to close the road. Downgrading maintenance is the first step to closing the road. You cannot cut the harbour in half and expect the eastern side to survive. Diamond Harbour is a commuter suburb and relies on access to Christchurch and Lyttelton. The additional travel time is far greater than the suggested 10 - 15 minutes. Effectively Christchurch north of Halswell becomes inaccessible unless as a day trip!!!! Lyttelton relies on Teddington Governors Bay Road for access for oversize loads and dangerous goods from the Port. The alternative is Evans Pass and through Sumner and the city. Rather than 40 movements per year, as resident of Gebbies Pass Road, I can assure you that there are 100s per year. Logging trucks and other heavy vehicles also rely on this route to the port and engineering facilities in Lyttelton. Central to any work in the area is a local source of materials. It is vital to maintain the Teddington Quarry as a working quarry and the CCC should be proactive in supporting this resource.	
29572	Somewhat	Overall feedback I'm aligned with much of the plan, but there are two crucial concerns for the future that demand our attention: The plans for Allandale and Teddington. The harbor is truly a jewel of our city—a beloved destination that draws residents year-round, especially on weekends and in the summer. Making it more accessible should be part of the future plan, not less. Accessibility is key to fostering community engagement with this stunning natural asset. Inspired by the success of the West Coast Cycle Trail, we should consider creating a continuous walking and cycling path that connects Lyttelton to Cass Bay, Cass to Governors Bay and onward to Allandale and further afield to Diamond Harbour. This trail would not only provide a scenic route for visitors and locals but would also encourage outdoor recreation, sustainable tourism, and a deeper connection to our remarkable coastal landscape. This plan should enhance access to the harbor in a way that supports both the environment and community well-being. Specific area feedback Allandale 1. Allandale Domain: While I support efforts to enhance Allandale Domain through native planting and restoration, eliminating the full usable flat area of this neighbourhood entirely would strip Governors Bay and the harbour of a treasured community asset. The domain has been a gathering place for generations, hosting local sports days, the annual fete and providing a space for horse riding traditions that span over 60+ years. Removing this useable area would erase a vital piece of the community's identity. Restoring Allandale Domain with native planting is a great step toward ecological revitalization, but let's ensure we don't lose its recreational value. 2. Allandale Hall: Closing and removing Allandale Hall would mean losing a vital community resource that has served as a gathering place for events, celebrations, and shared activities for years. Rather than removing it, we should explore sustainable ways to keep it open, such as seeking additional funding sources or community partnerships to support ongoing repairs. The hall is more than a building; it's a cornerstone of local identity and a hub that strengthens our community bonds. With thoughtful planning, we could maintain and even improve this cherished space, ensuring it remains accessible for future generations despite coastal challenges. 3. Governors Bay–Teddington Road: While the road may face increased flooding in the future, dismissing its long-term viability would be short-sighted. This road is a critical link for residents of Diamond Harbour and surrounding areas, providing essential access to Christchurch. Exploring adaptive solutions—such as flood-resistant engineering or improved drainage—could help maintain its accessibility as conditions change, preserving this key route for the many who rely on it daily. Let's build a plan that respects and preserves these essential aspects of our community. Teddington 2. Governors Bay–Teddington Road: The critical role of this road is severely underestimated. It's the primary route for Diamond Harbour residents commuting to Christchurch, and it connects Harbour and Eastside communities to the peninsula and Lincoln areas to the sea. Closing it would be a major oversight, disrupting vital connections across the network and affecting countless daily lives.	Brett King

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29656	No	Overall feedback Throughout the process to date the adaption plan, particularly with respect to community engagement, no plan, costings or benefits for credible alternatives (other than cursory high level and uncostered options) have been presented for consideration and community input. I attended the Coastal Adaptation Information Session at Diamond Harbour on the evening of 22nd October this year. At the session, I asked a question of the CCC team with respect to options considered and a cost benefit of each option, noting at the time, that whilst costs had been provided, there appeared to be a lack of considering viable alternatives with an absence of cost benefit, efficiency and effectiveness for those options considered. I was advised at that meeting, that proper cost benefit analysis of options would subsequently be provided on the letstalk.ccc web page within days and with sufficient time for comment. As of today, two days before submissions close there are no such cost benefit costings. The Resource Management Act 1991 (RMA) of places an obligation to consider all options primarily within its framework for such decision-making processes. Specifically, Section 32 of the RMA requires an evaluation of the costs, benefits, and risks of various options when preparing policies, plans, and regulations. This section mandates that decision-makers must consider alternative methods and assess their efficiency and effectiveness in achieving the objectives of the Act. Before proceeding any further - please provide evidence of such consideration and community input into those alternates. Specific area feedback Te Wharau Charteris Bay Functionally the Charteris Bay boat ramp would benefit from seal level rise as it is currently unusable at low to medium tides. Purau slipway is poorly maintained and even the latest plan still provides the false narrative (page 57 of the consultation document) that an alternative ramp exists at Diamond Harbour – it does not. The Purau ramp continues to be poorly maintained and hazardous at low tides – it is not a safe option. It is also unclear as to any plans for the Jetty opposite the ramp in the same bay. At present, the jetty is boarded up, hazardous to health and an eyesore. Any plan or works in this area should consider the future use and life of this asset. Ka whai hua te rāpapa poti o Charteris Bay i te pikinga o te taumata moana nā te mea kāore e taea te whakamahi i te tai iti ki te tai waenga. Kāore i te tiakina te huarahi rāpapa o Purau, ā, ahakoa te mahere hou, kei te mau tonu te kōrero hē (whārangi 57 o te tuhinga whiriwhiri) e kī ana he rāpapa kē kei Diamond Harbour – kāore i te pērā. Kei te noho mōrearea tonu te rāpapa o Purau i te tai iti – kāore i te haumarū. Kāore hoki i te māranga ngā mahere mō te Jetty kei tētahi taha o te rāpapa i te taua kokoru. I tēnei wā, kua tutakina te jetty, he mōrearea ki te hauora, ā, he mea whakarihariha. Me whakaaro ngā mahere, ngā mahi rānei i tēnei wāhi ki te whakamahinga ā muri ake nei me te oranga o tēnei rawa.	Ian Flatley
29708	No	Overall feedback Because you f-ing morons are not doing anything about the cause of sea level rise, every year NZ burns more liquid fuel than the year before which of course causes sea level rise you have to be the dumbest people on the planet	Tui Scott
29792	Somewhat	Overall feedback I do not believe that it reflects the views or feedback from the community. In particular it mis understands the nature of the harbour community. We are not multiple communities but one linked community. Maintaining a continuous vehicle connection around the harbour is essential to maintaining that community. Specific area feedback Te Wharau Charteris Bay I am in strong support of the decision to protect Marine drive in Charteris Bay and in doing so protecting the services under the road. I am in strong support of maintaining the road from Charteris Bay through Gebbie's Pass. However I am concerned that the road in Teddington is not going to be protected to ensure full service. The harbour community is one linked community and this has the potential to split the community in the middle. This road is not only links the community but is also the preferred, quickest and shortest route to Christchurch and the area's secondary school in Cashmere. I am also very concerned that Charteris Bay boat ramp is not to be raised and protected. This is a very well used asset, it is not steep, it is protected from winds/waves and is safe to use by families. Access to the sea is not just for recreation it is also important for food collection and life safety for evacuation and rescue. Puaru	Graeme Finlay

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
		I believe that the road along the foreshore should be protected. The road connects multiple properties in purau and access to the properties along Camp Bay road. The decision to maintain the road needs to look at the full costs to the community. Not just the cost of raising the road but also the loss in value to the community of losing access to the headlands and beaches and the loss of value to individual property owners.	
29799	N/A	See attachment - Page 59	Susan Thorpe
29931	N/A	See attachment - Page 63 Specific area feedback Koukourarata Port Levy See attachment	Martin & Verity Jay & Scarlett
29934	N/A	See attachment - Page 71 Specific area feedback Koukourarata Port Levy See attachment	Christopher John Craw
29948	N/A	See attachment - Page 74 Specific area feedback Koukourarata Port Levy See attachment	Andrew and Wendy Oh
29952	N/A	See attachment - Page 76 Specific area feedback Koukourarata Port Levy See attachment	Philip and Jane Helps
30223	N/A	See attachment - Page 78	Ian McIntosh

SUBMISSION TO: Christchurch City Council

ON: Draft Coastal Hazards Adaptation Plan – Whakaraupō Lyttelton Harbour and Koukourarata Port Levy

BY: Te Pātaka o Rākaihautū Banks Peninsula Community Board

ADDRESS: [REDACTED]

DATE: 13 November 2024

1. INTRODUCTION

Te Pātaka o Rākaihautū Banks Peninsula Community Board (“the Board”) appreciates the opportunity to provide a submission on the Council’s draft Coastal Hazards Adaptation Plan for Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.

This submission aligns with the following Board priorities:

- **‘Proactive planning for climate change’** The Board is committed to actively engage in the Coastal Hazards Adaptation Plan process to support those communities most affected by sea level rise and to advocate that climate change adaptation and resilience planning includes climate mitigation measures, so that adaptation activities do not contribute to climate change.
- **‘Good social and physical connections for our communities.’** The Board is committed to supporting improved walking tracks and pedestrian linkages, including connected walkways to enable children to safely walk to school.
- **‘Work with all relevant parties to support healthy harbours and bays.’** The Board supports the Whaka-Ora Healthy Harbour programme of work to restore the ecological and cultural health of Whakaraupō Lyttelton Harbour as mahinga kai.
- **‘Improve infrastructure to support community resilience’** The Board is committed to working with staff to review levels of service for rural roads and marine structures in light of increased frequency and intensity of storms.

2. SUBMISSION

Overall the Board supports the Draft Adaptation Plan and have the following feedback/suggestions:

Governors Bay to Allandale Foreshore Track:

The Board wishes to advocate for ongoing maintenance and defense of the Governors Bay to Allandale foreshore track. This heavily used track is of extremely high value to the community for the following reasons:

- It is the only flat area in the locale for people to run, walk and cycle and is used daily by many.
- It is where children can learn to ride their bikes and mothers can push a pushchair.
- It is accessible for those with limited mobility or who are restricted to a wheelchair.
- Young children from Allandale use the track to bike to school in Governors Bay as a much safer option than taking the road.
- Children walk the track between Governors Bay and Allandale to socialise with friends.
- It is used by walkers, runners, older residents, cyclists, families, tourists and dog-walkers.
- There is no alternative safe route as there are no footpaths between Governors Bay and Allandale, and the roads are too narrow and hilly to accommodate shared use footpaths adequate for all of the above activities.
- The loss of this track will be significant for the community.

The Board also supports upgrades to the existing Allandale to Governors Bay Road to enable pedestrian use.

Jetty/wharf infrastructure

It will be important for residents to have alternative transport options in the event of flooding/inundation/earthquake preventing access via vehicle. The Board would like to ensure that the maintenance and improvement of existing jetty/wharf infrastructure be prioritised in future planning.

Allandale Hall:

The consultation document notes that the Allandale Hall will be affected by sea level rise and will likely need to be removed at some point in the next 50 years, or sooner if not repaired. The Board considers the hall to be a viable and much valued community facility and strongly supports the full repair and re-opening of the hall to benefit the community for the next 40 to 50 years.

Governors Bay-Teddington Road:

The Board supports the ongoing maintenance of the Governors Bay – Teddington Road, however, believe the term ‘reduced level of maintenance’ is causing concern in the

community and suggest a change of wording to clarify that this does not mean less maintenance. This road is an important daily transit route to Christchurch for many residents of the area, whether it be for work, sport, medical treatment or school. Travelling to central Christchurch via Gebbes Pass will add approximately 30 minutes to travel time one way; a huge cost increase in terms of time and fuel for Mt Herbert communities and a potentially costly delay for fire and emergency services.

The Board would like to see a cost-benefit analysis between raising the Governors Bay-Teddington Road as opposed to the realignment and widening of Gebbes Pass, taking into account that assessment of Gebbes Pass as the main route should include costings of continued ongoing low-level maintenance of the Governors Bay-Teddington Road. Additionally, the Board would like confirmation of a commitment from Waka Kotahi NZTA to maintain SH75 to a high level to accommodate the expected additional load in future.

Allandale Landfill Removal:

The Board supports removal of the Allandale landfill site and future protection of the area to ensure the future ecological health of the harbour.

Other comments:

The Board is very happy to hear about a monitoring plan framework that will help with many of the questions the community has around timing for example, how will CCC know to 'faze in' upgrading of Gebbies Pass to make it suitable for all types of vehicles and a higher number? How much time before the Teddington Road is closed due to ongoing flooding or inundation?

The Board acknowledges concerns raised by residents about insurance cover for properties affected by forecast inundation.

Well done to all who contributed to this important work. The engagement and experience of those who worked on this including community and staff is appreciated. The process provided a good foundation which is much needed to help the community be heard on this issue and find a way forward together and we trust that community engagement and information sharing will be ongoing for all affected communities.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Lyn Leslie', is written over a light grey grid background.

Lyn Leslie

Chairperson

Te Pātaka o Rākaihautū Banks Peninsula Community Board

Draft Coastal Hazards Adaptation Plan

Planning for sea-level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy

Feedback from Governors Bay School – Yrs. 6-8, 23rd October 2024

As children and young people and residents of Te Whakaraupō, we believe the decisions being made now will impact us and our children the most. Therefore, we appreciate the opportunity to provide feedback on the Draft Coastal Hazards Adaptation Plan for Te Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.

Although the wider plan was discussed and considered, we mainly focused on Allandale and the Governors Bay Foreshore Track and the Governors Bay Teddington Road. However, we also have some feedback on the proposed marine transport network and the harbour in general.

Feedback

1. THE GOVERNORS BAY FORESHORE TRACK

Summary of our collective and agreed views

We really value the track and use it a lot, as do visitors to our community. The track is part of who we are. Therefore, although we accept that it will flood and erode more and more and, at some point, it will need to close, **we do not agree with your current preferred pathway between now and then.**

- Firstly, we are unsure about what ‘lower levels of service’ will look like. This needs to be explained, because you want to do this within the next five years. Does it mean we won’t be able to use it as much?
- We noticed in your preferred pathway, that after about 30 or so years, you will go straight to closing the track and not even trying to maintain or protect it.
- **We would prefer that between now and the threshold of closing it, that you consider protecting the track**
- But whatever you do, ensure all other living things are considered and protected as part of the approach.

Individual comments

Thinking about cost efficiency, what about all the other tracks you just spent millions building to make one large walkway, with the key point of connecting it to the foreshore. Would it not cost more to redo that and connect than to just adapt the foreshore? - **Iona**

Move it or maintain it. Take steps so we don’t have to close it, with areas for people to walk with no hill, for older people, kids to ride bikes, beach access and for runners
– **Aria and Bronte**

It will be hard to protect the track, but walking on it from Governors Bay to Allandale reduces carbon emissions. The track is a big part of our community, but it will be hard to keep – **Kate.M. and Meg**

This is part of our community and has been for a very long time Taking it from us is taking it from our culture, our heritage and our soul. This is just not an old dirt road. We will not stand for this, and we are not alone. This has been passed down for ages and heaps of people who have passed away walked there and you can’t take those people from us. Do what **YOU** want, because it is all about **YOU**, isn’t it. Because you think our voices are not big enough. But like little fish, we are stronger together. We will fix this and not toxicate the waterways. And in 60 years, we would like to come back and say this is where I am from, this is me – **Xavier, Arlo and Toby.**

2. The Governors Bay Teddington Road

Summary of our collective and agreed views

We agree that the road needs to be maintained and with the general direction of your preferred pathway, but we do wonder how you will manage the lower levels of service.

- However, **we think you should act on the threshold of raising the road, or even moving it, earlier.**
- **Our preferred pathway** is to maintain for about 30 or so years and then go straight to raising (or moving it) in about 40 or so years, bypassing the lower levels of service option.
- But whatever you do, ensure all other living things are considered and protected as part of the approach.

Individual comments

We feel like we should fix the road immediately because the road will be closed for a long time and there might not be a track along the foreshore for people to walk along. So, there will be no way for people to get to Allandale – **Kate M. and Meg**

Why not raise it now? Our plan will cost the same – **Arlo, Xavier and Toby**

3. Marine transport network

Summary of our collective and agreed views

Generally, we really like the idea of the marine transport network.

- Something we would like to see in your plan is to make sure that, whenever possible, **the boats being used are eco-friendly and use renewable energy.**
- We would also like there to be **a focus on limiting the impact of the system on the health and wellbeing of marine life and surrounding the surrounding natural environment.**

Individual comments

I think this is a very sustainable, efficient idea as all places and ideas have been considered and the rising sea levels are most likely not going to affect this plan - **Iona**

Will it disturb the marine life? And how expensive will it be e.g. the tickets, the boats etc. Will the network disturb recreational activities i.e. kayaking, sailing etc.? Will there be an age limit for school children? – **Aria and Bronte**

Yes, we like this sustainable and reasonable idea! – **Lumi, Giulia, and Hugo**

It would be a great line of transport, expellee if we could go on a boat to school and see friends – **Arlo, Xavier and Toby**

We think this is a good idea. But it is also hurting the oceans and animals from the fuel.

Would people be able to go from Allandale to Rāpaki without a pitstop at Lyttelton? – **Kate.M. and Meg**

4. General, collective feedback

We really like the idea of Te Whakaraupō becoming a marine reserve and Quail Island becoming a sanctuary for birdlife. We would also like to see more trees, so a plan for planting trees would be good, especially native and ones that don't burn easily.

Draft Coastal Hazards Adaptation Plan

Planning for sea-level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy

Feedback from Lyttelton Primary School 'Nature Rangers' – Yrs. 7-8 (approx. 15 children) 6th November 2024

As children and young people and residents of Te Whakaraupō, we believe the decisions being made now will impact us and our children the most. Therefore, we appreciate the opportunity to provide feedback on the Draft Coastal Hazards Adaptation Plan for Te Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.

As the Council's Draft Coastal Hazards Adaptation Plan is not currently focusing on Lyttelton itself, we considered

1. Whakaraupō in general, providing feedback on how coastal hazards may impact the things we value and what we would like to happen to protect and maintain them
2. The Marine Transport Network.

Feedback

- 1. How coastal hazards may impact the things we value and what we would like to happen to protect and maintain them.**

Summary of our collective and agreed views

We really love living in and around Lyttelton. It is a special place to us. We especially love the people and vibe, the wildlife – both on the land and in the water - and the natural environment in general, swimming in the ocean, and walking in the port hills.

Coastal hazards, made worse by climate change, will threaten the things we value. Increased extreme weather events could possibly cause more erosion around the harbour and the hills, possibly polluting the water. The same erosion could also threaten people's homes, and change the bush, including animal habitats. Rising sea levels could flood people's and other animal's homes and wash away food sources. It could also break roads and walkways which could make moving around the bays difficult.

To help us adapt and become more resilient, we would like to see more trees planted, especially native and fruit trees; renewable energy sources such as solar panels, subsidized so people can afford the; and working with nature when exploring solutions.

We would consider building walls and placing sandbags as a temporary solution. We also like the idea of looking at lifting roads to protect them from climate change

By the way, we really don't like cruise ships using the harbour. They pollute the water, use fossil fuels, and the tourists don't always treat our community and the surrounding natural environment with the respect we think it deserves.

Individual comments

I would like more native, fruit producing trees to be planted inland, and bug hotels as well as bird feeders to be promoted.

I think the cruise ships are extremely bad for the environment because 1. All the gross stuff in the water and 2. All the tourists dumping trash.

I think that if we keep retreating further and further inland and then eventually, we will run out of land to go to, and so we should focus on stopping it before we can't, even if we need a temporary wall to give us a bit more time to find a long-term solution.

The cruise ships are bad for the community and the harbour because when they come in, people crowd the local shops, things get stolen, and Corsair Bay (as an example) used to have sand and clear sea, but ever since the cruise ships came, the bay has been muddy and murky.

2. The Marine Transport Network.

Summary of our collective and agreed views

Individual comments

Generally, we like the idea of using the harbour for transport. It would be good because people will use the roads less, reducing the pollution from fossil fuels and less accidents on the road. However, we do have some concerns that we would like you to consider.

Depending on how you power the boats, they could possibly pollute the water. Therefore, we would like you to commit to using renewable energy sources when and where possible. This includes making sure it is easy for them to power up. You could also consider sail boats and limiting the number of boats using the harbour at one time.

We also worry about the impact on marine life from increased use of boats. How will you make sure they are ok and protected? As an idea, you could have people on boats whose job it is to look out for marine life.

People love the convenience of their cars and driving them. Therefore, even though it might be a good idea, they won't use it. How will you encourage people to use the Network?

Individual comments

I think it will be better for the nature on land, but it might be bad for the animals in the water. You could still have the boats, but have not that many bots going around at once.

Having more boats will make more pollution causing more damage to nature. That means more climate change which hurts the sea animals and land animals.

I would also like to see the increased use of EVs and Public Transport.

Good idea but what about the marine life?

It is good, as people will use the road less. But it still uses fossil fuels and people will still drive on the road.

Draft Coastal Hazards Adaptation Plan

Planning for sea-level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy

SUBMISSION from Next Generation Conversation (NGC)

Next Generation Conversation (NGC) is a group climate change advocates aged between 11 and 16 living in Ōtautahi/Christchurch. We have a strong interest in climate change and meet regularly to discuss policy issues and seek opportunities to engage with and influence decision makers.

As a collective, we wish to provide the following points as a submission to Council's Draft Coastal Hazards Adaptation Plan - Planning for sea-level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy.

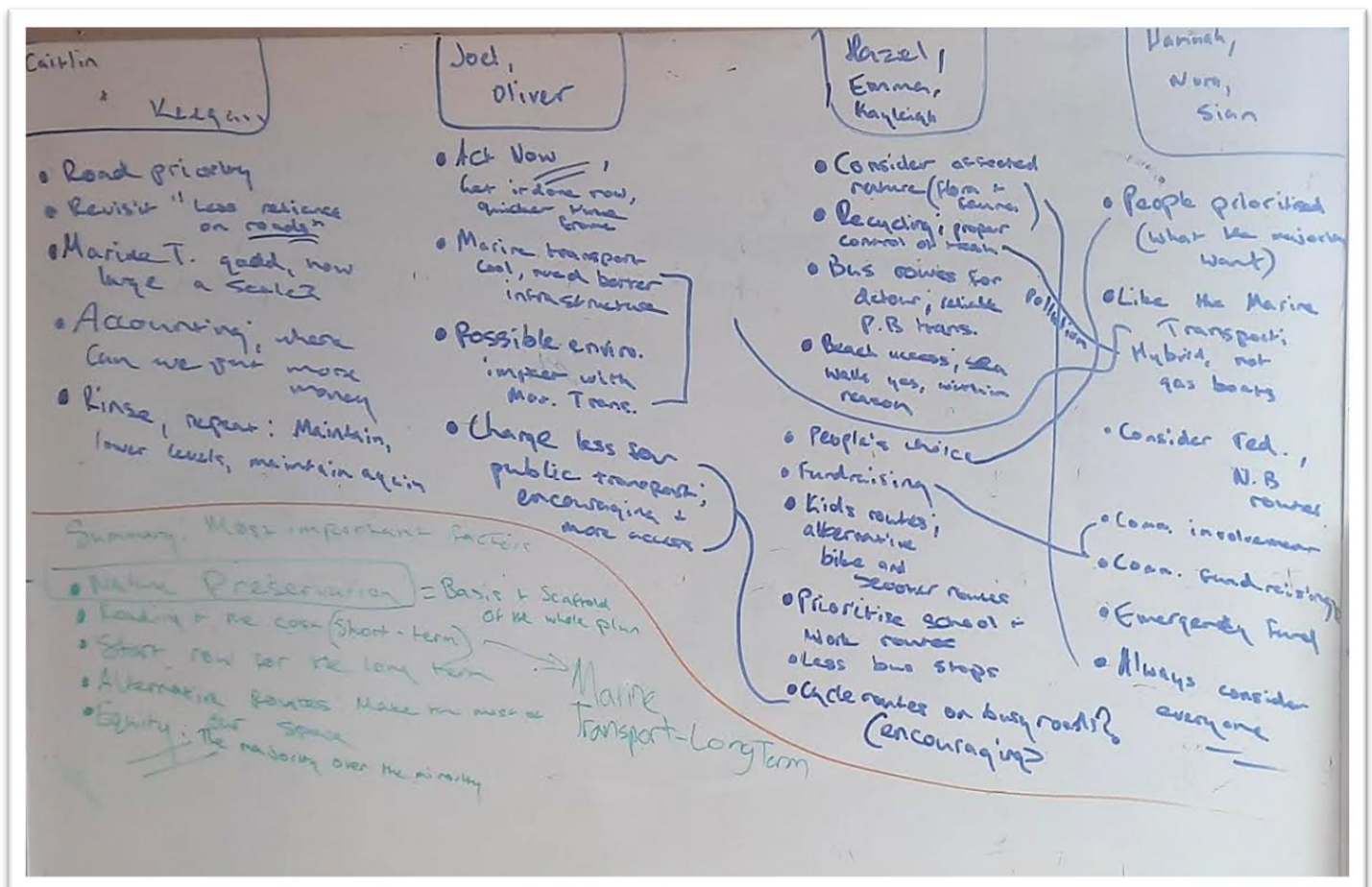
Some of us live in the area, but numerous of us do not. However, we all value the Whakaraupō and appreciate the opportunity to provide feedback. We also believe it is beneficial to collaborate and learn from this first engagement as communities across the city and nation begin their own conversations and planning.

Ensuring the community is openly encouraged to share their views now but also as the plan is implemented is incredibly important to us. This includes ensuring there is a diversity of opinions that reflects Whakaraupō needs and wants, now and into the future. We want to make sure that whatever plan is agreed on, it reflects the majority of the community's needs and wants.

Our collective feedback

As a group, we have three key feedback themes

- Nature Preservation
- Planning: Short and long term
- Transport: Roding, the Marine Transport Network and alternative routes



1. Nature Preservation: The basis and scaffold of any plans

Ensuring humans are prepared and are safe is important, but other living things also need to be part of the plan. Therefore, a key consideration of any plans for the area needs to be its effect on the natural environment. This includes land and marine impacts, and flora and fauna.

Whatever we do, it needs to be done with nature - **Hannah**

Climate change impacts such as increased extremes weather events, wildfires, flooding and erosion will affect the natural environment, including animals and their habitats. Although we acknowledge it isn't always feasible, where possible, we suggest you prioritise working with and preserving nature.

Like many who have provided feedback already, we value clean and healthy waterways, beaches and sea; and the geology of the area and natural environment, including the animals that make it their home. It is the reason many live and visit the area and contributes greatly to health and wellbeing.

We would like more native trees to be planted to provide habitats and help with the erosion and fire control. To protect and increase wildlife, we would also like reserves to be established in the area. The reserves will also provide green spaces for people to enjoy and relax in, and natural 'soft' barriers for flooding and erosion.

2. Planning: Short and long term

We strongly believe that we need to act as soon as possible. Climate change is unpredictable, and we need to take adaptive measures now.

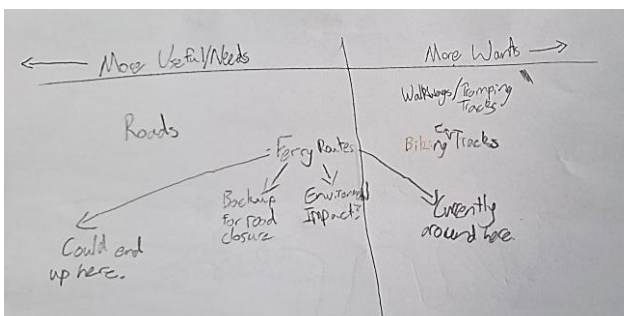
While we understand some things should and need to be staggered over the longer term, some things such as tree planting, infrastructure required for the Marine Transport Network, flood control and renewable transport needs to be invested in and progressed now. Even if the impacts aren't as bad as predicted, taking these measures early will benefit the community and the city regardless.

I believe that acting now is important. Long term ideas need to be acted upon more quickly to prevent long term impacts on any adaptive measures. It will cut down on cost and improve these things sooner, but the focus needs to be on the more used activities -

Ollie

Of course, a key consideration is cost including who will pay in the short and long term. For this reason, via our submission and deputation, we supported the Council's decisions in the Long-Term Plan to accelerate adaptation planning and the climate resilience fund.

To ensure the financial responsibility is not placed on one generation, current or future, we suggest considering a shared cost arrangement between Central and Local Government and the community. This could be via tax/rates and/or tolls.



Taking this 'act now' approach may also mean compromising on some things. Referring to the 'Funding and Financing' section in the information book, we suggest that you reduce the number of public toilets and revisit the Purau Jetty, and the amount needed for the Allandale landfill.

Consideration also needs to be given to the population and use of an area.

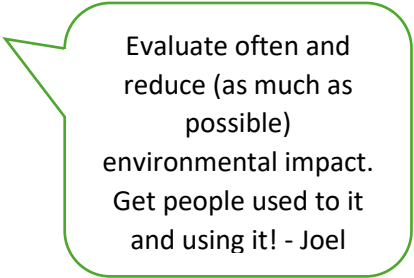
Finally, for the short-term and as a temporary solution, we believe roads need to be prioritised. Reliable roading access will allow the necessary infrastructure required for future adaptive measures to be progressed.

3. Transport: Roading, alternatives routes and the 'Marine Transport Network'.

As discussed previously, in the short-term, we believe prioritizing roading is important. However, as infrastructure is progressed and alternative transport options increase, the reliance on roads should be decreased. This would mean accepting lower levels of services as time goes on. Nevertheless, for emergency purposes e.g., medical, and house

and wildfires, access needs to always be a priority. This may mean raising or moving specified roads, and ensuring communities are aware of emergency procedures.

As an aside, even with the roads being maintained, while acknowledging the convenience of individual car use, we would still like to see an increase in alternative transport, such as buses, bikes and walking. To achieve this and make them a more attractive option, consideration would need to be given to cost i.e., subsidized, convenience (timetables and location), and safety (especially bike routes and walking tracks). We would also like to highlight that



Evaluate often and reduce (as much as possible) environmental impact. Get people used to it and using it! - Joel

investing in cycle and walking tracks will provide alternative routes when roads and the marine transport network are not accessible. They will increase health and wellbeing.

In general, as a longer-term option, we support the Marine Transport Network. We like the idea as it will allow easier and faster access across the harbour to, increases the places you can access, and it will provide an alternative to cars and roads.

However, we would like to see a commitment towards the use of renewable energy sources to power the boats i.e., hybrid, solar, wind etc. Therefore, to establish the network so it is responsive to growing needs and climate change impacts, there obviously needs to be a big investment in infrastructure.

We would also like access to Purau and South New Brighton to be considered.

As the Network is used more and more, we are concerned about the impacts on the natural environment and marine life. This needs to be factored into the planning. We suggest limiting the number of boats using the harbour at one time, speed limits and considering the type of boats being used.

Thank you for the opportunity to share our views and ideas on the Council's Draft Coastal Hazards Adaptation Plan - Planning for sea-level rise in Whakaraupō Lyttelton Harbour and Koukourarata Port Levy. We look forward to sharing them in more detail at the hearing.

Ngā mihi nui,

Next Generation Conversation

CCC Draft Coastal Hazards Adaptation Plan - Submission from the Diamond Harbour Community Association

We thank the CCC Coastal Hazards Adaptation Planning team and the Specialist & Technical Advisory Group for their work on this plan, including providing support and technical data for the discussions of the Coastal Panel. We also thank the members of the Coastal Panel, individuals drawn from communities around the harbour, for their hard work and judgement on what are essential considerations for everyone living in this area.

We support the general objective of protecting the things which make our lives possible and enriched, in the face of the potential effects of climate change. Given the nature of our location, terrain and predominant vegetation, amongst the effects most likely to have a bearing on the Diamond Harbour community in the foreseeable future are rising sea level and increased fire risk. The current draft plan represents an important stage in our city council's attempt to address the first of these, and we will encourage as many people as possible to engage in this consultation process.

Diamond Harbour

We are fortunate in that all of our residential areas are located on headlands along the southern side of the harbour that are not at immediate or even longer-term threat from a raised sea level. In addition, our new jetty should enable ferry services to continue for many decades to come. Consequently, our concerns are mainly for the future of the land between us and Christchurch City, including at Charteris Bay/Orton Bradley, Teddington and Allandale.

Charteris Bay/Orton Bradley/ (p47-51)

From a Diamond Harbour perspective, the integrity of the road is paramount, but there is also the boat ramp which is used by some of our residents for mainly recreational purposes.

We are pleased that the Plan suggests that within 5 to 10 years, measures should be taken to protect and raise the existing road – around the coast - which would also protect the water and wastewater pipes running along the road. We believe that an alternative route, such as via Andersons Road, would impact more local residents, probably be more expensive given the terrain, and so should be considered as a last or later option.

Now that the coastal route has been determined to be the preferred choice, we would ask that work on it be undertaken as soon as possible, without an interim maintenance period. Regardless of sea level rise, the existing “armouring” is barely adequate during high tides, and maintenance during the last 5 years has been of the band-aid variety. It's our opinion that provision of a durable sea wall along this (relatively short) section of the road may not be as costly as has been estimated, and surely the sooner it is built the better in terms of cost and reduced need for maintenance. The harbour is very shallow here and although high, the tides are rarely as rough or destructive as farther out into the harbour.

Although of lesser priority, we would also support the provision of a footpath on the sea wall, as has been constructed along the road from Ferrymead to Sumner, as this is a popular route for pedestrians whose safety would be greatly improved.

As regards the Charteris Bay boat ramp, we accept the Plan's viewpoint that although it should be protected in the short and medium-term, it may eventually need to be closed due to its relative height, and an alternative location could be used for recreational boat launching (eg. Purau).

Teddington (p42-46)

Many of our residents rely on regular trips to & from Christchurch and Lyttelton, including for work, shopping and recreation. The direct route via Teddington Straight is also regularly used by freight, logging and trade vehicles which provide vital services to our communities, not to forget that pupils from this area travel every weekday to & from Cashmere High School.

We agree that there is some merit in the Plan's aim to ensure at least one route between the southern harbour and Christchurch, and consequently to consider two different parts of the road – a) Governors Bay to Teddington intersection and b) Teddington towards Moepuku Peninsula.

As with the Charteris Bay area, we would ask that whatever the eventual route decision, work on the roads around Teddington starts sooner than projected in the Plan. Again, the harbour is very shallow, seas are not rough, so there seems little reason to wait till the sea becomes deeper and budgets may become tighter.

We would ask that more information be provided on the options here, than seems to be given in the current Plan document:

- What is the structural difference between the “flood-proofing” mentioned in relation to Teddington Straight, and the “one metre” raising noted for the Gebbie's Pass to Charteris Bay road?
- Presuming the two treatments are different, what would be the cost of raising Teddington Straight in the same way as the other road?
- How much of the \$25 million quoted for Gebbies to Charteris Bay would cover improvements from Gebbies Pass to Teddington intersection, and how much from the intersection to Moepuku?

Without this kind of breakdown, it's difficult to tell how the cost of treating the whole route from Moepuku to Allandale in the same way would compare with the above \$25 million.

From a layperson's point of view, the estimated costs given for the Teddington Straight improvements and “flood-proofing” at Allandale seem quite modest if they would provide infrastructure protection for this important route over the next century. [Currently \$683 million is being spent on a stadium holding only 30,000 a few times a year, with a forecasted annual maintenance net budget of \$2.5m.]

We ask that when assessing the Plan's preferred Gebbie's Pass route, the extra travel costs for our residents using that route should be fully considered, as it can add 15 to 30 minutes onto a trip from Diamond Harbour to central Christchurch depending on the time of day. We believe that this would especially affect Cashmere pupils and our elderly residents, as it could add an hour to a round trip.

We would like to know whether Christchurch ratepayers will in some way be asked to fund associated improvements to the Selwyn District section of the Gebbie's Pass route. The intersection of that road and State Highway 75 is barely adequate or safe at current traffic volumes, so would surely require upgrading if this were to become the sole route.

Purau (p52-60)

Although not vital for our residents in terms of transport infrastructure, many use the road, boat ramp, jetty and beach for mainly recreational purposes. The risks from sea level rise to all of these is quite high and therefore we welcome the consideration given to the impacts on these different features of the area and to the possible strategies which could be used over the next century.

We support the Plan's proposals to begin protective work for the longshore section of Purau Avenue in the short-term. We understand that in the longer-term a decision may have to be taken to move the road to allow a through route to Port Levy.

We also support the Plan's suggestions regarding upgrading or replacing the jetty and protecting the boat ramp (especially if the Charteris Bay one becomes inoperable).

Kind regards

Graeme Fraser, Chair, Diamond Harbour Community Association – 14 November 2024

Purau Residents Submission on CHAP 17/11/2024.

As we adapt to coastal changes, the Purau community objectives are to continue to maintain the connectivity between all of our neighbours in Lyttleton Harbour/Whakaraupo and to continue to contribute support from the community, to protect current assets.

Some concerns raised from residents were that data projections as far as 100 years away, may never see the sea level rise to the proposed levels. It is agreed that we need to think long-term but we also need to re-assess and revisit, with shorter timeframes within the 100-year projections and re-evaluate the situation, for example, every 25 years. In particular, with the introduction of new and different data inputs to the modelling as climate change takes holds. Sensitivity analyses beyond 10-25 years are very difficult to predict.

With regards to the items identified by CCC for consultation, the following comments have been received from residents.

1. Roads

Option 1, **flood-proof and protect** the existing roads is the preferred option by residents. Protection in the form of boulders can be placed from now and over time to build up a defence.

Can Council reveal a break-down in costings for road protection, the budget appears to be excessive for a predicted 1m rise in sea level.

Approximately in which decade is the road re-routing expected to happen according to the modelling? and at which stage is each of the proposed options likely to become defunct.

What and where would a new road route be and look like? And which properties would be under compulsory purchase or altered to accommodate this?

Is the intention from CCC for the beachfront properties to be abandoned and retreat in the long-term? How and who would compensate these property owners?

2. Jetty and Boat Ramp

Option 1, is the preferred option by residents. Raise and protect the jetty and boat ramp and then Option 2, to build a new jetty and protect the boat ramp in 25-years time. It seems more economical to build a new jetty and boat ramp that will last long term. This could also be built to offer a ferry service.

3. Reserve

Option 1, is the preferred option by residents for active naturalisation with Purau residents' support.

4. Public Toilet

Option 1 is the preferred option by residents to build a relocatable toilet in a suitable location and if funding is available Option 2, to relocate the toilet to a different location on the East side of the bay near the beach, in an area unlikely to flood. An inland proposed option is not easily accessible and is not a favoured option.

In addition:

- Connectivity around the harbour is imperative for residents to maintain relationships with neighbouring residents, Rapaki marae and an alternative route if Gebbies pass is impassable.
- From a Civil Defence perspective, the Teddington Road to Governors Bay needs to be maintained to offer a quicker route out of the harbour and an additional route out of the harbour in the event of a fire and/or earthquakes.
- Reinstate the ferry to Purau when the new Jetty is upgraded, offer a sea highway to residents as alternative transport e.g. as communities in the Marlborough Sounds now operate.
- How were the hearing panel members selected and what is their expertise in making decisions based on the consultation feedback?

Other Harbour Areas of Concern:

- Teddington Road, the preferred option is to maintain this road to a high level for the long term 100-year planning. Flood proof and maintain the road. This is the school bus route for our high school children to their nearest high school. What alternatives have you looked at for schooling?
- Allandale, the preferred option is to maintain the road to a high level for the long term, flood proof and maintain.
- Charteris Bay, the preferred option is for Option 1, to flood proof and protect the road. Protect the wastewater and water supply pipes and boat ramp.

Submission on the Coastal Hazards Draft Adaptation Plan

To: Christchurch City Council
53 Hereford Street
Christchurch

Attn: [REDACTED] Engagement Advisor
Email: letstalk@ccc.govt.nz

Submitters: Wharf Road, Port Levy residents

Name	Property affected by the Plan	Contact details
Christopher John Crow	[REDACTED]	[REDACTED] [REDACTED]
Carolyn Crow	[REDACTED]	[REDACTED]
Andrew and Wendy Oh	[REDACTED]	[REDACTED]
Philip and Jane Helps	[REDACTED]	[REDACTED]
Jim Barribeau and Catherine Solomon	[REDACTED]	[REDACTED] [REDACTED]
Richard and Clare Barnett / Kaihope Farm	[REDACTED]	[REDACTED] [REDACTED]
Martin Jay and Verity Scarlett	[REDACTED]	[REDACTED] [REDACTED]

Address for service: Christopher John Crow - [REDACTED]

Wish to be heard: Yes, we would like to be heard in support of our submission

INTRODUCTION

1. We are long term residents and community members of Port Levy and live along Wharf Road which is the only access to our homes. **Figure 1** below shows our properties affected by the proposed closure of Wharf Road.



Figure 1: Properties affected by Wharf Road closure in the Plan

2. We have lived here for a very long time, ranging through 25 to 40 and over 77 years and have built a tight-knit community, hence the group submission.
3. Wharf Road is not only used by residents, but also by farm workers, AirBnB operators and their customers, stock trucks, friends, family and visitors. As residents and ratepayers, there is a legitimate expectation to be able to use and access our properties and farms via Wharf Road. This is our only access and as such, our only option to be able to receive emergency services for medical and/or fire emergencies. We would never anticipate nor accept the loss of Wharf Road.
4. We acknowledge climate change and its effects in the future, however we do not consider the Council has received the feedback from all stakeholders and residents in the Port Levy community, namely the residents of Wharf Road, due to lack of consultation.
5. The only equitable way to move forward is to go through a process of consultation to allow this feedback to form part of the decision-making process.
6. We make this submission in opposition of the preferred pathway to close Wharf Road in the Coastal Hazards Draft Adaptation Plan (the **Plan**).

SUBMISSION

Breach of natural justice - Lack of consultation with residents on Wharf Road side of bay

7. While it appears that the Council has done a considerable job of consulting with the various groups and communities, they have either missed our side of Port Levy or have only made contact with a small number of Port Levy residents who they believed represented the views of the whole community - including the residents of Wharf Road. This is not the case.
8. The nature and degree of consultation should occur with the residents on whom the burden and effects of the proposed change falls heaviest.
9. At a meeting of the Port Levy Residents' Association on the evening of Sunday 10th November, a unanimous resolution was passed supporting that the Council consult with Wharf Road residents directly on the Plan before any decisions are made.

10. The Council has focussed too heavily on the community on one side of the bay and consequently has overlooked the rest of the community on the other side. The Wharf Road community is particularly affected, given the document contemplates “Wharf Road Closure “ – and while Port Levy operates as a functioning community as a whole, this particular consultation needed specific consultation with the Wharf Road subgroup because of the anticipated high impacts.
11. The Council has failed to consult all necessary and directly affected parties, which only came to light recently. Therefore, the Plan is flawed, and the part that relates to Wharf Road should be withdrawn or decided on at a later date, once proper consultation and alternatives have been investigated.

Cultural and historical significance

12. The Council has identified cultural significance of Port Levy (the right side of the bay) but has failed to consider the cultural and historical significance of the area along Wharf Road. See excerpt below on the history taken from research undertaken by the University of Canterbury and a local business in the Port Levy area.

“Manaaki Mai is historically significant for Banks Peninsula, and New Zealand as a whole. The history is explored in this section, including the original owners of the area, why they sold the property, the creation of the Old Port Levy road, and the subsequent buildings.”¹

13. The failure of Council to consider the cultural and historical significance is further reason as to why the preferred pathway identified in the Plan for Wharf Road should be reconsidered.

Sea level rise

14. Wharf Road is approximately 2.9km long with approximately 2.4km of it sitting around 5 metres above sea level. See **Figure 2 and 3** below.



Figure 2: Wharf Road incline from out 41 Wharf Road looking left.

¹ Manaaki Mai, Creation of Old Port Levy Road and the subsequent buildings, <https://manaakifarm.weebly.com/history.html>.



Figure 3: Wharf Road heading north with incline around the Bay (yellow arrow).

15. We consider the main risk of Wharf Road is actually erosion from the inland side rather than sea level rise. This would mean, for Wharf Road to be maintained, approximately 2.4km of hillside that would need to be protected from erosion/rock fall. This corresponds to the circled area in **Figure 4** below.²



Figure 4: Wharf Road (left of bay), pink line that indicates area potentially prone to erosion that is the main vulnerability of Wharf Road, not sea level rise.

16. We are supportive of finding an engineering solution to this issue, which the Council will need to address in a similar fashion for many of its Peninsula roads with geotechnical issues.
17. The leap to road closure before exploring Geotech issues is:
 - a. Inconsistent with the Council's general approach to roading on the Peninsula;
 - b. Fails to have regard to the impacts of closure, and the need to weigh these up against the impacts and expectations of residents and road users;

² Page 6, image of current sea level rise, Adapting to sea-level rise, Koukourarata Port Levy, 2023.

- c. Made on a preliminary basis before the science and costs of erosion control have been evaluated; and
 - d. Leads to no pathway which might allow for adaptive management of the Wharf Road area as engineering solutions can change over time.
18. Has Council assessed this risk and the costs of mitigating it as an alternative option to closing the road? Has the Council evaluated alternatives such as limited access roads/ weight restriction limits/ 4WD access that would enable the road to remain open for residents?
 19. We consider the above alternatives have not been assessed as viable options, which they should be. Cutting off a community to their one and only access should not be taken lightly, and all options should be considered with the input from the residents affected, which in this case has not happened.

Expectation when purchased properties that it would have access

20. Every resident who has bought and invested to live along Wharf Road had an expectation when they purchased their property that they would have access to it.
21. As discussed in the previous section, cutting off a community to their one and only access that they have had for over 150 years without appropriate consultation to those affected is a considerable oversight.
22. Farms and AirBnB's³ have been established along Wharf Road, and the effects on people's businesses and livelihoods hang in the balance.
23. The Council's revised document following a hearing needs to address options for on-going access on a permanent basis.

Potentially landlocked land

24. The closure of Wharf Road would mean the properties shown in **Figure 1** above would be landlocked. What is Council proposing to provide residents with alternative access? Surely this needs to be identified and the alternative access formed first prior to any decision on any road closures.
25. There are two paper roads, namely the Old Port Levy Road, which is partially formed, and Field Roads that could potentially join over the hill to Purau. Is this an option Council has considered to ensure our community is not landlocked? What are the costs involved with this and will this be included in the funding and financing table of the Plan?
26. It appears Wharf Road is the only asset without any funding⁴. It seems outrageous that the community using Wharf Road, rate paying residents are worth less and not worthy of any funding or financing compared to for example, public toilets. Is this how Council views their residents and ratepayers?
27. The document provides no reassurance to residents on the precise meaning of what "Closure" means under the Adaption Plan. By its very nature, Adaption encompasses the notion that solutions can be determined over time, as the Coastal environment changes – but for Wharf Road residents there is the ongoing threat of closure, rather than adaption.
28. Again, this threat is inconsistent throughout the Port Levy community.

³ According to the AirBnB website, there are three AirBnB's along Wharf Road.

⁴ Page 79, Funding and financing table, Draft Coastal Hazards Adaptation Plan.

Emergency access

29. The Plan contemplates that in an emergency, temporarily repairing roads may be undertaken by the Civil Defence Emergency Management team to ensure people's safety. How is the Civil Defence going to repair roads, when the road is proposed to be closed?
30. Elderly people are particularly disadvantaged and this lack of access for emergency services could realistically lead to death. How are the residents, farms and animals, visitors in the area supposed to get emergency assistance when Council is proposing to close the roads?

100 year timeframe - Rural roads closing due to potential sea level rise

31. While we do not dispute climate change and the potential effects this has in the future, we do not consider the Council should be predetermining the outcome for 40 years' time, when the science is so uncertain. A pragmatic approach is required with flexibility for all options to be considered at the appropriate time.
32. We find that the proposal for Wharf Road is premature. Surely the issues of coastal roads will be addressed nationally so that standard policies can be adapted by Councils in relation to the issue of sea level rise.
33. There are a lot of rural roads along the coastline throughout New Zealand that will be affected, and therefore planning should be undertaken now to make sure they still have the necessary access to continue to access their farms, homes and livelihoods.
34. It is generally accepted that rural communities are resilient, and we are, however, cutting off our access goes beyond resilience. We may be few in numbers, but our contribution to the community of Port Levy should not be marginalised.

Procedural fairness – Pa and Fernlea Road vs Wharf Road

35. The Council have been told by the community of Port Levy that they don't want to see it cut off due to road issues. That the roads, "*Purau-Port Levy Road, Fernlea Point Road, Pa Road are local roads that provide important access to Koukourarata Port Levy.*"⁵ We do not understand why Wharf Road has been excluded from this statement as the residents along Wharf Road are just as much a part of the community of Port Levy as those who live near the wharf and therefore should be provided with the same level of access.
36. Pa and Fernlea Road and Wharf Road are all classified as local roads under the Christchurch District Plan and so should be treated the same.
37. As can be seen in **Figure 5** below, Wharf Road can be maintained with minimal funding, considerably less than Pa and Fernlea Road since it is unsealed. Quarrying local rock to raise sections of the road would be a saving rather than bringing fill from further afield.

⁵ Page 5, Adapting to sea-level rise, Koukourarata Port Levy, 2023.



Figure 5: Wharf Road condition, unsealed.

38. Council has unfairly decided that due to a numbers game, Wharf Road and consequently its residents, are second class to those along Pa and Fernlea Road.

RELIEF SOUGHT

39. Reject the preferred pathway proposed by the Plan to close Wharf Road.
40. The Council to allocate the required funds to preserve access via Wharf Road and to treat the community of Port Levy equally on both sides of the bay.
41. For Council to not create landlocked land and to continue to provide access along Wharf Road or to provide alternative access for the community along Wharf Road.
42. Allow for adaptive solutions to be developed over time, rather than prematurely determining the fate of Wharf Road and its residents.
43. Define what closure means for those residents and provide for an adaptive pathway of continued access, rather than closure.
44. The Council has failed to consult all necessary and directly affected parties, which only came to light recently. Therefore, the Plan is flawed, and the part that relates to Wharf Road should be withdrawn or decided on at a later date, once proper consultation and alternatives have been investigated.
45. Council to consult with the residents and affected parties along Wharf Road, assess the cultural significance and detrimental effects of closing Wharf Road before making recommendations that are workable and appropriate, not just cost effective.

OTHER COMMENTS

46. We have been in contact with the Council over the last few weeks to arrange a meeting to discuss the adverse effects of the Plan to the residents of Wharf Road. We have been unable to meet before the close of submission on 17 November 2024.
47. We therefore reserve our right to provide additional comments to our submission until such time a meeting with Council has taken place.

Additional Submission on the Coastal Hazards Draft Adaptation Plan

To: Christchurch City Council
53 Hereford Street
Christchurch
Attn: [REDACTED] Engagement Advisor
Email: letstalk@ccc.govt.nz

Submitters: Wharf Road, Porty Levy residents¹

Address for Service: Christopher John Crow [REDACTED]

Wish to be heard: Yes, we would like to be heard in support of our submission

Introduction / Site visit

1. This is an additional submission to the draft Plan after a meeting was held between Wharf Road residents and Council staff, namely, [REDACTED], [REDACTED] and [REDACTED] on Saturday, 30 November 2024 at the former Port Levy School.
2. We thank Council staff for giving up their Saturday morning to meet with us and look forward to [REDACTED] returning to undertake a site visit of Wharf Road.
3. [REDACTED] role as Council's traffic engineer and his assessment of Wharf Road and any further alternatives identified as a result, should be considered as part of any evidence provided in this process.

Consultation

4. The residents and Council staff agreed to disagree whether consultation of Wharf Road residents actually occurred prior to the draft Plan being released for submission. We are adamant that no direct notification/letters to landowners other than a letter advising of the inclusion of notes in LIM back in 2022 were received.
5. If there were other letters sent directly to landowners, we are happy to be provided of such documentation.
6. We recommend for all future consultation that landowners should be sent letters directly and communicating with Resident Associations/Groups should not be heavily relied on given membership is not compulsory.
7. We consider the meeting held does not cure the failure and duty to consult affected parties and residents of Wharf Road prior to any recommendations being made to Council. We

¹ As listed in the primary submission submitted to Council on 12 November 2024.

reserve the legal rights and remedies available including administrative law remedies arising out of the failure to consult. Nevertheless, the meeting was very much appreciated.

8. We also note that the previous consultation document from end of 2023, only provided two options for roads in Port Levy. These were:
 - A. Flood-proof the roads ('Hold the line' approach); and
 - B. Move the roads to higher ground ('Work with nature' approach).²
9. There was no mention of any roads being closed. The only mention of Wharf Road is under the note of Option B to Move the roads to higher ground that said, "*It is unlikely that we would look to relocate at-risk sections of Old Port Levy Road and Wharf Road, because the low levels of use would make it hard to justify the cost.*" Logically, it would follow that Option A, to flood-proof the roads, would be the option undertaken.
10. The other documentation called, *Koukourarata Port Levy*, doesn't even show the other side of Port Levy where we live on Wharf Road. Within a year, the draft Plan is out for consultation with only the roads on one side of Port Levy being flood-proofed and protected. Port Levy is both sides of the bay, not just one.

Road closure / Lower levels of service – clarification of terminology

11. The definition and understanding of what closing the road actually means was discussed. Under the draft Plan it states, "*A road closure means that a certain section of road is temporarily or permanently blocked off, preventing all, or certain, types of vehicles and pedestrians from using it.*"³
12. The draft Plan also states that "*eventually, it'll need to be closed to some or all types of traffic.*"⁴
13. As laypersons reading the draft Plan, when a road is proposed to be "closed" and a recommendation made to "eventually closing it", and where emphasis is added in the previous paragraphs, this does not indicate it will remain open to residents. There is no explanation for continued access to be provided or acknowledgement that Wharf Road is the only access and therefore would only ever be partially closed.
14. Council will need to reword the relevant sections of the draft Plan if what was intended is to only partially close Wharf Road to the public while retaining it for resident's use.
15. Council staff understood and accepted the ambiguity with the words used and that full closure i.e. road stopping, would not occur as the residents would be landlocked and

² Page 11, Adapting to sea-level rise Koukourarata Port Levy.

³ Page 4, Glossary, Coastal Hazards Draft Adaptation Plan.

⁴ Page 73, Wharf Road, Coastal Hazards Draft Adaptation Plan.

therefore would be provided with alternatives. Council staff said this would be clarified accordingly in their report to the Hearings Panel.

16. The term “lower levels of service” also needs to be included in the Glossary of terms and clarified. From a layperson’s point of view, this term is also ambiguous. Generally speaking, lowering levels of service would indicate lack of funding/maintenance of that service. This needs to be made clearer.

Proposed amendment to wording of the preferred pathway

17. We propose the wording of the preferred pathway to be amended as follows:
“The diagram below shows the preferred pathway through the adaptation option of maintaining the road, lowering its level of service and, eventually if required, closing it to the public only while retaining access for residents, with one alternative option of flood-proofing and protecting the road. For the avoidance of doubt, if Wharf Road is closed to the public, it will continue to be open to landowners, occupiers and any person having authorised business requiring access to the properties.”⁵

Alternatives discussed / Lack of details costs for alternatives

18. The discussion on alternatives considered for Wharf Road along with details of any costs associated with flood proofing and protecting Wharf Road was minimal. We were disappointed that Council staff couldn’t provide a list of alternatives considered as part of the draft Plan or any breakdown of costs associated with any alternatives that were specific to Wharf Road.
19. How are the public supposed to know and us as residents able to consider alternatives without being able to see any? And how is the Hearings Panel supposed to make informed decisions without these details and comparisons of how costs are attributed between the various Council assets and what factors were considered when recommending preferred pathways?
20. This is why we consider a site visit should be undertaken by [REDACTED], Transport Engineer for the Council. [REDACTED] pragmatic and technical expertise will be beneficial and will assist in explaining what practical other alternatives for Wharf Road is possible.
21. There was one alternative discussed briefly to re-align Wharf Road to avoid the coastal hazard area at the head of the bay. This coastal hazard area is shown in **Figure 4** at paragraph 31 in this submission.

⁵ Page 73, The pathway, Coastal Hazards Draft Adaptation Plan.

22. We consider there has been no investigation of this feasible alternative option which we consider will cost less than flood-proofing and protecting Wharf Road in its current location. By re-aligning the road, it then sits outside of the coastal hazards area, while providing residents with access. Whether this access is a 4WD track or other, can be decided further down the track.
23. We recommend including this alternative to the other options included in the draft Plan.

Mitigation

24. As previously submitted, the Wharf Road residents are a tight-knit community. It is understood that posts were erected and vegetation such as reeds were planted in the bay near the intersection of Wharf Road and Purau Port Levy Road as shown in **Figure 1** below.



Figure 1: Aerial view of posts erected in the water and vegetation (reeds) planted as part of mitigation measures



Figure 1A: Posts erected and vegetation (reeds) planted as part of mitigation measures

25. This helps with dispersing the incoming water and preventing the severity of coastal hazards along that part of the coastline.
26. We understand there are already existing mitigation structures on Wharf Road as shown in blue in **Figure 2** below⁶.



Figure 2: Main engineered erosion mitigation structures (such as seawalls or revetments) that currently exist

27. The existing structures are of varying type, effectiveness and condition, and may provide some degree of erosion mitigation now and into the future.
28. We would like to coordinate with Council in what mitigation measures can be undertake now in conjunction with the existing mitigation structures, to alleviate the effects of coastal hazards in this particular area. This way, as a group, we are empowered to support our own community, rather than relying on Council funding when the situation of Wharf Road is at its worst. As the saying goes, prevention is better than cure.

Coastal Hazards

29. The draft Plan sets out how to manage the risks posed by coastal hazards and sea level rise. Coastal hazards “considered in this document [the draft Plan] are coastal flooding, coastal erosion and rising groundwater.”
30. We refute that all of Wharf Road is susceptible to coastal hazards as defined. As indicated our primary submission, coastal hazards and sea level rise would only affect the first 500 metres of Wharf Road. As shown in **Figure 3** below, the road from [REDACTED] (shown with light blue cross hairs) heading north is unaffected by the coastal flooding (shown in blue).

⁶ Christchurch coastal hazards online portal, Coastal Erosion: <https://gis.ccc.govt.nz/hazard-viewer/coastal-erosion>



Figure 3: Section of Wharf Road unaffected by coastal flooding as it sits significantly above sea level.

31. The section of Wharf Road actually affected by coastal hazards in the draft Plan is shown in **Figure 4** below.



Figure 4: Section of Wharf Road affected by coastal flooding (approximately 500 metres).

32. The rest of Wharf Road actually sits above sea level, and the only effects to it would be erosion from cliff side.
33. Therefore, any alternatives and/or costs associated for flood proofing and road protection should only take into account the first 500 metre section of Wharf Road as shown in Figure 4 above.

Science and modelling

34. While we are not scientists nor experts in climate change, we are the residents that live on Wharf Road and Port Levy who have seen throughout our lifetimes the effects of severe weather events in our area. The various documents show current sea level rise and modelling showing 1 in 100 year events that indicate parts of properties would be under sea level. This is for a “rare event”.
35. We can say without a doubt that flooding has not occurred in the bay closes to Wharf Road. The cottage at 41 Wharf Road has been in existence for over 80 years and there are no signs it has been affected by flooding.
36. We also note that the 2021 Coastal Hazard Assessment “*is a broad-scale assessment which provides a general indication of the magnitude and extent of hazards across neighbourhood-sized areas.*”⁷ Recently, in Nelson it was found that properties were wrongly included in hazard maps.⁸ Clearly the assessment and any modelling maps are broad brush and may or may not be accurate.
37. Therefore, we consider any modelling should be ground truthed to be impartial and to accurately identify what coastal hazards effects are realistic before decisions are made that have a high impact to a community such as ours.
38. Adaptation means “*the action or process of adapting or being adapted.*” Therefore, if the Council adopts the draft Plan, it has to be clear to everyone that the information, preferred pathways and everything relied on to draft this Plan will change and for it to adapt to the changes in the future. It may be that these types of plans are reviewed every 10 years like the District Plan.

Consequential amendments

39. If there are consequential amendments required to the other sections of the draft Plan, such as the Funding and financing, the draft Plan should be renotified, and submissions called for again with the modifications to the relevant sections shown. Alternatively, consultation with the residents would be required to understand the consequences of any consequential amendments.

Relief sought

40. The preferred pathway to be clear that Wharf Road is to remain open to residents to ensure they are not landlocked.

⁷ Christchurch coastal hazards online portal, How does this hazard information affect me?: [Christchurch coastal hazards online portal](#)

⁸ 1100 properties wrongly included in hazard maps, Stuff.co.nz, 4 December 2024 <https://www.stuff.co.nz/nz-news/360509453/1100-properties-wrongly-included-hazard-maps>

41. Clarification of the meaning of “close” and “levels of service”. A note to indicate that nothing in this document is set in stone as climate change, coastal hazards are a moving feat along with the science and data that will inevitably change.
42. Proposed wording of preferred pathway to be amended to read as per paragraph 17 above. For ease of reference the wording is repeated below:

“The diagram below shows the preferred pathway through the adaptation option of maintaining the road, lowering its level of service and, eventually if required, closing it to the public only while retaining access for residents, with one alternative option of flood-proofing and protecting the road. For the avoidance of doubt, if Wharf Road is closed to the public, it will continue to be open to landowners, occupiers and any person having authorised business requiring access to the properties.”
43. The inclusion in the draft Plan of the alternative option to re-align the first 500 metres of Wharf Road as per paragraphs 21 and 22.
44. Consequential amendments, if any, to be made to the draft Plan as per paragraph 39 above.
45. Prior to any decision being made on the draft Plan, a list of alternatives considered for Wharf Road to be produced along with associated costs for each alternative. This will enable everyone including decision makers to be able to make informed decisions.



Federated Farmers of New Zealand

**Submission on:
Draft Coastal Hazards Adaptation Plan**

17 November 2024

SUBMISSION TO CHRISTCHURCH CITY COUNCIL ON:
DRAFT COASTAL HAZARDS ADAPTATION PLAN

Submitter details

Name of submitter: North Canterbury Province, Federated Farmers of New Zealand

Contact person: Dr Lionel Hume
Senior Policy Advisor

Address for service: Federated Farmers of New Zealand
C/- Farmlands Cooperative

[REDACTED]
[REDACTED]

Mobile: [REDACTED]

Email: [REDACTED]

SUBMISSION ON THE DRAFT COASTAL HAZARDS ADAPTATION PLAN

Introduction

Federated Farmers welcomes the opportunity to submit to Christchurch City Council on the Draft Coastal Hazards Adaptation Plan.

Federated Farmers of New Zealand is a voluntary, primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers and their communities.

Federated Farmers aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which:

- Our members may operate their businesses in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

The economic importance of the agricultural sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%. Land-based primary sector exports comprise well over 70% of New Zealand's merchandise exports. Any council plan or action which affects farm businesses has the potential to also impact, positively or negatively, on the district, regional and national economies.

This submission was developed in consultation with the members and policy staff of Federated Farmers.

Federated Farmers acknowledges any submissions from individual members of Federated Farmers. In particular, we support the submissions of the Wharf Road, Port Levy Residents and Philip and Jane Helps.

Federated Farmers wishes to be heard in support of its submission.

Key Submissions

- Federated Farmers strongly opposes the intention expressed in the Draft Coastal Hazards Adaptation Plan not to provide flood proofing and protection for Wharf Road, in the knowledge that this will potentially lead to the closure of Wharf Road.
- We ask that the preferred pathway for Wharf Road be amended to provide flood proofing and protection.
- Flood proofing could be achieved by raising the low 400 m long section of the road. This could be achieved using materials that are close at hand. Protection from erosion on the landward side of the road would also be desirable.

- Flood-proofing and protection of wharf road is justified because of the number of residents and the value of businesses that rely on it.
- Flood-proofing and protection of wharf road is consistent with statements in the One Network Road Classification Guidelines¹ that: *New Zealand's roads are a vital part of our transport infrastructure and make a major contribution to economic growth and community vitality.* More specifically, it is stated that: *rural roads are the first link in the supply chain between our farms and forests and world markets.*

Background

Federated Farmers acknowledges the need to plan for the likelihood of rising sea levels and the associated increased risks posed by coastal hazards. Therefore, we support the development of a Coastal Hazards Adaptation Plan.

It is stated that the plan focuses on managing vulnerable (within the next 30 years) public assets such as roads, wharves and water supply pipes over the next 100 years. It is further stated that the draft plan is based on the Coastal Panel's recommended preferred adaptation pathways for each asset based on the availability of options to continue to maintain assets, accommodate/live with the risks to the assets, protect from the hazard or retreat from the hazard. Avoidance is only possible for new assets, by preventing their location within the perceived hazard zone in the first place.

In the message from Manaia Cunningham (representative of Te Runanga o Koukourarata) it is stated that: "We are privileged to live in this place, and the Coastal Hazards Adaptation Planning team, like all of us, is committed to protecting what we have now." Federated Farmers supports the sentiment that this place has much value and deserves protection, including its infrastructure and the wellbeing of all of its people.

Many people who live and work around Whakaraupo Lyttelton Harbour and Koukourarata Port Levy have done so for generations. They are connected with the landscape and sustain their lives, and those of their families, from it.

Federated Farmers is very concerned about the apparent lack of consultation with residents and businesspeople on the Wharf Road side of Koukourarata. This issue must be thoroughly addressed before any further development of this Coastal Hazards Adaptation Plan.

Koukourarata Port Levy

This submission is focused on the preferred adaptation pathways for Koukourarata and especially the preferred pathway leading to the potential closure of Wharf Road.

It is stated (p 10 of the Draft Adaptation Plan) that sea levels have risen by around 10 cm in the last 15 years. However, a recent GNS Science study² has shown that there have been accelerated rates of subsidence following the Christchurch and Kaikoura earthquakes. It was found that greatest subsidence had occurred around the edges of the Avon Heathcote Estuary, Lyttelton Harbour and Koukourarata Port Levy. It is stated that, in some locations, the land has sunk 10-20 cm. This exceeds the estimate of sea level rise of 10 cm, stated in the Draft Coastal Hazards Adaptation Plan.

¹ NZ Transport Agency 2013: Applying the One Network Road Classification Guidelines.

² Hamling I.J.; Kears J. 2023: Inter-seismic, co-seismic and post-seismic rates of vertical land movement in the Christchurch district and implications for future changes in sea level. Lower Hut (NZ): GNS Science. 18 p. Consultancy Report 2023/81.

It is important that the mechanism for potential sea level rise is understood. Subsidence following the earthquake is likely to level off and needs to be distinguished from effects resulting from climate change which are potentially be more ongoing. This understanding is necessary in order understand likely rates of change in the elevation of land above sea level, future risks, and how they might best be addressed.

Wharf Road

Wharf road provides access to 9 dwellings, about 36 land titles and numerous businesses, including 3 farms and at least 5 B&B's. It also links with three paper roads, Fields Road and Craw's Road/Old Port Levy Road. Craw's Road/Old Port Levy Road was formed by a developer as a subdivision consent condition, with ongoing maintenance to be done by Council. Field Road is partly formed and used to provide farm access. Wharf Road has existed and provided this access for over 150 years. Every resident or businessperson affected by the potential closure of Wharf Road has invested in their property/business in this location (farm, homestay, residence etc.) with the clear expectation that access via Wharf Road would be maintained.

It is estimated that the portion of Wharf Road most at risk is approximately the first 400 m out of a total length of approximately 2.9 km. It is estimated that the lowest (400 m) portion of the road is about 1 m above mean high water. The rest of the road is considerably higher than this.

According to longstanding local residents, surface flooding from severe weather events is no more frequent now than in the past, with the most severe event recalled being in 1968. Further, it has been pointed out that the main issue for the road is not inundation but erosion (rockfalls etc.) on the landward side of the road.

It has been pointed out that raising the 400 m of road potentially threatened by coastal inundation would not be massively difficult and that the materials needed to do this are available close at hand.

Network Principle

The maintenance of publicly funded infrastructure networks (including roads) is the hallmark of a civil society. Secure road access is necessary to provide access to homes, education, healthcare, emergency services, and to enable businesses to move goods in and out. Such networks enable New Zealanders to function collectively, as a nation.

It is stated in the One Network Road Classification Guidelines³ that: *New Zealand's roads are a vital part of our transport infrastructure and make a major contribution to economic growth and community vitality. More specifically, it is stated that: rural roads are the first link in the supply chain between our farms and forests and world markets.*

A stated goal of the One Network Road Classification Guidelines is: *to provide road users, whether they are vehicle drivers, riders on passenger transport, cyclists or pedestrians with more consistent customer levels of service across the country.*

Recommendation

Based on the arguments put forward, above, Federated Farmers asks that the preferred pathway for Wharf Road be amended to provide for flood proofing and protection.

³ NZ Transport Agency 2013: Applying the One Network Road Classification Guidelines.

Conclusion

Federated Farmers thanks Christchurch City Council for the opportunity to submit on the Draft Coastal Hazards Adaptation Plan and looks forward to working with Council as the plan is further developed.

A handwritten signature in black ink, appearing to read 'Karl Dean', with a long horizontal line extending to the right.

Karl Dean
President, North Canterbury Province,
Federated Farmers of New Zealand

Submission on the Coastal Hazards Draft Adaptation Plan

To: Christchurch City Council
53 Hereford Street
Christchurch

Attn: [REDACTED] Engagement Advisor
Email: letstalk@ccc.govt.nz

Submitters: Wharf Road, Port Levy residents

Name	Landowner/occupier	Contact details	Number of people in household
Clare & Richard Barnett	[REDACTED] Farm	[REDACTED]	2
	[REDACTED]	[REDACTED]	
Other members of our family working on this family farm			
James & Bridgette Barnett	[REDACTED] [REDACTED]	[REDACTED]	5
Annabel Barnett	[REDACTED] [REDACTED]	[REDACTED]	1

- We have farmed at this address since 1964, and would make 12-18 trips a day on Wharf road. We farm other blocks in Port Levy and all stock come along Wharf road to get to our shearing shed and yards as part of our farming operation.
- Wharf road is a vital link for stock trucks, freight trucks, fuel tankers, as well as our service agents such as stock agents, vets, stock food suppliers and for our farm workers.
- We also run holiday accommodation and guests use Wharf road to access our property.
- We live on [REDACTED] and this paper road runs up through our steep gully and provides access to most of our farm up to [REDACTED] and down the other side in to [REDACTED].
- [REDACTED] has never been maintained by the council, as it is an unformed paper road.
- The junction of Fields and Wharf road is our only access point to our farming property, as the topography of the farm goes up either side of steep gullies and there is no option to create any type of access.
- Wharf road provides access for family and visitor to visit. We also have a lot of tramping groups we give access to to tramp to Mt Evans.
- Our postal service drives to our home to deliver and take supplies for our accommodation business.
- Power companies use this route also to maintain and repair power lines and trim trees etc.

- This route is also important for emergency services such as ambulance and fire engines, both of which have over the years had to come to take a family member to hospital.
- We would no longer be able to farm this property if the Wharf road was let to deteriorate or if as you are suggesting be closed.
- No one has consulted, spoken or advised us of any plan, and we have just found out what is being intended in the draft Coastal Hazards Draft Adaption Plan, we find this unbelievable that we have not been included or consulted, given that this has dire consequences for us as a family and a business.
- Most of Wharf road sits well above sea level and the foreshore is the main area of concern given sea level rise. We believe we know what options in the past that have been used to mitigate sea action and yet no one has seen fit to either ask or inform us. There may well be other options that the Council has not considered

Address for service:



Wish to be heard: Yes, we would like to be heard in support of our submission

INTRODUCTION

1. We are long term residents and community members of Port Levy and live along Wharf Road which is the only access to our home. **Figure 1** below shows our properties affected by the proposed closure of Wharf Road.



Figure 1: Properties affected by Wharf Road closure in the Plan

2. WE have farmed this land since 1964, and prior to that the Field family farmed here from 1850. We now have the third generation of our family working on the farm and the fourth generation living here in Port Levy. What are the councils responsibilities in providing us with a legal access to the property, for without it this enterprise would cease to operate.
3. Our land value and livelihoods would be at stake, as would our families inheritance.
4. We make this submission in opposition of the preferred pathway to close Wharf Road in the Coastal Hazards Draft Adaptation Plan (the **Plan**).

SUBMISSION

Procedural fairness – Pa and Fernlea Road vs Wharf Road

5. We do not understand why Wharf Road has been excluded from the rest of the community, by providing access to one side of the bay and not the other, This is inherently unfair. Effectively the council will be causing some members of this community to no longer be able to live here and work the land.
6. Council has unfairly decided that due to a numbers game, Wharf Road and consequently its residents are second class to those along Pa and Fernlea Road.
7. These roads are used by a great many people, it is the main area in Port Levy to access the rocky foreshore on this side of the bay for the collections of shell fish (mussels and oysters). In the summer many people will drive this road to come and swim and access the sea.
8. Pa and Fernlea Road and Wharf Road are both classified as local road under the Christchurch District Plan and so should be treated the same.

Potentially landlocked land

9. The closure of Wharf Road would mean the properties shown in **Figure 1** above would be landlocked. What is Council proposing to provide residents with alternative access? Surely this needs to be identified and the alternative access formed first prior to any decision on any road closures.
10. Not having a road able to carry large stock and trailers units to our farm would effectively mean having to build some infrastructure (yards, cattle yards and wool shed) many kilometres away from where our main farming operation is, and at great cost.

Expectation when purchased properties that it would have access

11. Our family bought and invested in this farm on Wharf Road expecting there would be access to our property.
12. *Emergency access*
13. Reading the Plan it appears that Civil Defence Emergency Management team will be responsible for temporarily repairing roads to ensure people's safety. How realistic is this? if the road is left to deteriorate in the next 20 years. Is this really feasible?

14. Insurance could also be a real problem for this property if access is unsuitable for services such as the fire brigade are not able to be met.

RELIEF SOUGHT

15. Reject the preferred pathway proposed by the Plan to close Wharf Road.

15 November 2024

SLR Ref No.: FuelCo Feedback_CCC Draft Coastal Hazards Adaptation Plan_v1.0

Christchurch City Council

By email: letstalk@ccc.govt.nz

SLR Project No.: 810.V12111.00001

RE: Feedback on Draft Coastal Hazards Adaptation Plan

Submitter:

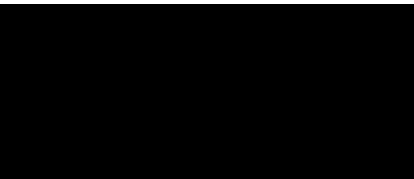
bp Oil New Zealand Limited
PO Box 99 873
Auckland 1149

Mobil Oil New Zealand Limited
PO Box 1709
Auckland 1140

Z Energy Limited¹
PO Box 2091
Wellington 6140

Hereafter referred to as the **Fuel Companies**

Address for Service:



Attention: Phil Brown

Phone:

Email:

¹ On behalf of the wider Z group, including the Z Energy and Caltex operations in New Zealand.

Introduction

- 1 bp Oil New Zealand Limited, Mobil Oil New Zealand Limited, and Z Energy Limited (*the Fuel Companies*) receive, store and distribute refined petroleum products around New Zealand. In Christchurch (*the district*), the Fuel Companies' core business relates to retail fuel outlets, including service stations and truck stops, supply to commercial facilities, and operation of bulk fuel storage facilities (*terminals*), including associated pipelines. Of particular relevance to this feedback are the three terminals operated by the Fuel Companies, located on George Seymour Quay and Charlotte Jane Quay, at Lyttelton Port. Petroleum is delivered to these terminals in bulk shipments via the coast and is piped to the terminals from where it is distributed, either via pipeline or road.
- 2 Christchurch City Council (*the Council*) has released its Draft Coastal Hazards Adaptation Plan (*the CHAP*) for feedback. The Fuel Companies appreciate the opportunity to provide comments at the draft stage and would be pleased to discuss these comments further with the Council in advance of it making a final decision on the CHAP or in relation to future coastal hazard planning.
- 3 The Fuel Companies support the CHAP's intent to manage risks posed by coastal hazards and rising sea levels through focusing on the management of vulnerable public assets such as roads, wharves, and water supply pipes.
- 4 The Fuel Companies wish to ensure that any future coastal adaptation planning undertaken by the Council recognises, where relevant, the role of the terminals and associated infrastructure. In particular, (1) their necessary location in a coastal environment, (2) their general resiliency to coastal hazards, and (3) the Fuel Companies' role as a lifeline utility in the event of a natural hazard emergency.

Location of terminals in a coastal environment

- 5 The terminals and associated pipelines are recognised as regionally significant infrastructure in the Canterbury Regional Policy Statement (RPS). Much of this infrastructure comprises essential lifeline utilities that are ready and able to provide a strategic function at any time in the region's emergency response plan. This regionally significant infrastructure is located within the Lyttelton Port which is subject to a range of natural hazard risks. Much of this infrastructure has been established in their respective locations due to functional and operational requirements. Often, such as in the case of the terminals and associated pipelines, the need for their location close to the wharf means that there is no alternative location or method.
- 6 ***The Fuel Companies seek that any future coastal hazard planning for the Whakaraupō Lyttelton Harbour recognises the functional and operational need for terminals and associated regionally significant infrastructure to be located in a coastal environment.***

Resiliency of terminals to coastal hazards

- 7 The Council has not proposed a specific adaptation plan for the Whakaraupō Lyttelton Harbour at this stage. The Fuel Companies presume that this is because coastal hazard impacts are likely to be minor, as reported in CCC's *Coastal Hazards Adaptation Planning info brochure – Lyttelton*. Notwithstanding, for the purpose of future coastal hazard planning, the Fuel Companies wish to highlight the general resiliency of terminals to coastal hazard risks.
 - a) Infrastructure commonly found at terminals (e.g. fuel storage tanks, pipelines, stormwater infrastructure) is subject to a range of engineering design



requirements (including the Hazardous Substances and New Organisms Act 1996 (HSNO) and associated regulations), such that it is generally resilient to natural hazard events, including coastal flooding. Compliance with industry best practice would, in any case, require the design of facilities to maintain their integrity and function during natural hazard events.

- b) The Health and Safety at Work (Major Hazard Facilities) Regulations 2016 require robust operational / system management protocols to be implemented at terminals to ensure efficient and proactive responses are in place, in the event of a natural hazard emergency.
 - c) Terminal are restricted access sites and do not attract large numbers of people, nor are they activities where people may be restricted from leaving the site in the event of a natural hazard emergency. As such, coastal hazards are unlikely to present a significant risk to human health and/or safety.
- 8 ***The Fuel Companies seek that any future coastal hazard planning for the Whakaraupō Lyttelton Harbour recognises the resilience of terminals and associated infrastructure.***

Civil Defence – Role of the Fuel Companies as a lifeline utility

- 9 The CHAP discusses the importance of enabling emergency response actions in the event of a natural hazard event. In this regard, it is relevant to note that terminals and service station sites are ready and able to provide a strategic function at any time in the region's emergency response plan.
- 10 The distribution of petroleum products to retail outlets and bulk customers for a fuel source, essential lubricant or additive for motors for machinery is a 'lifeline utility' under the Civil Defence Emergency Management Act 2002. The terminals provide a necessary fuel reserve that is easily utilised in emergency situations, including for the supply of fuel to service stations for use in emergency power generation and fuel supplies for emergency services. It is essential to be able to secure use of the fuel supply line in an emergency, often for extended periods of time.
- 11 ***The Fuel Companies seek that future coastal hazard planning for the Whakaraupō Lyttelton Harbour and Koukourarata Port Levy recognises the role that fuel provides in the event of a natural hazard emergency.***

Conclusion

- 12 On behalf of the Fuel Companies thank you once again for providing the opportunity to provide feedback on the draft CHAP. The Fuel Companies would welcome the opportunity to provide further comment prior to the CHAP being finalised. For any further information you may require or to discuss the issues referred to above please contact the undersigned on [REDACTED] or [REDACTED]

Signed on behalf of Z Energy Limited, bp Oil New Zealand Limited and Mobil Oil New Zealand Limited

Regards,

SLR Consulting New Zealand





Phil Brown
Associate Planner





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,
- Diamond Harbour Community 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.
- 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 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.
 - 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.
 - 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.
 - This is a potential emergency access location for emergency services or for evacuation reasons.
 - 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.

MANAGED RETREAT WOES

REPORT NOT FIT FOR PURPOSES OF PLANNING

Dr Willem de Lange's report entitled 'Coastal Hazard Risk Assessment for the Kapiti Coast' was commissioned by the Coastal Ratepayers' Union as a response to a report commissioned by the Kapiti District Council.

However, an independent science panel later convened by Kapiti Coast District Council showed that council staff through implementing the sea level rise data recommended in the report used '**science not fit for the purposes of planning**' in placing coastal hazard lines on 1500 LIMs,. Following a court ruling, the coastal hazard lines were required to be removed. Litigation may well follow this error, which unjustifiably caused 300 residents to sell their properties.

According to impeccably qualified New Zealand geoscientists however, it is preferable to measure sea level rise in the time honoured fashion via tidal guage records, some of which go back 150 years, instead of satellite data which measure oceans rather than local coastlines. Tidal guages give accurate data, far preferable to the satellite modelling beloved of multinational consultants, which result in eye watering costs and do not reflect the practical reality of New Zealand's complex coastlines.

The concomitant and inevitable result of the latter course of action will be massive contracts for consultants and the bureaucrats who implement them, all based on false data, and the decades long payment for which is forced on ratepayers already drowning in the debt, caused by similar foolhardy 'planning' based on similarly fanciful 'modelling.'

CHRISTCHURCH DISTRICT COASTAL HAZARD ASSESSMENT 2021

The **2021 'Coastal Hazard Assessment for the Christchurch District,'** a summary report commissioned by CCC, declares that sea levels will rise off the Canterbury Coast by up to 1.4 metres over the next century!

Expressing a contrary view, a meticulous 2020 New Zealand wide study by Dr Paul Denys and colleagues, taking into account seismic activity, has found there to be only 1.5mm sea level rise annually.

1.5mm annual sea level rise amounts to 15cm per century, which is easily manageable by CCC on behalf of citizens. Yes, you heard that right. You were told in the CCC report that we must expect a frightening 1.4 metres? Well not actually, it's nowhere near that bad.

15 centimetres per century is all we have to worry about. Help is at hand.

The above definitive annual sea level rise calculation of 1.5mm arises from the 2020 New Zealand wide study by Dr Paul Denys and colleagues, as in the following quote from their research article: **Sea Level Rise in New Zealand: The Effect of Vertical Land Motion on Century-Long Tide Gauge Records in a Tectonically Active Region.** Paul H. Denys, R. John Beavan, John Hannah, Chris F. Pearson, Neville Palmer, Mike Denham, Sigrun Hreinsdottir.

To quote from their research:

‘Key Points

We use 15 years of continuous GPS data to estimate vertical land motion and use precise leveling data to determine the stability of benchmark networks

The vertical land motion also includes an estimate of accumulated seismic events including postseismic deformation and slow slip events

The vertical land motion corrected trend gives a sea level rate of $+1.45 \pm 0.36$ mm/year (1891–2013) ‘

ANOMALY IN CCC SEA LEVEL RISE REPORT – A CONCERNING DIVERGENCE OF SCIENTIFIC OPINION

As the above Sea Level Rise research study by Dr P Denys and colleagues was released in January 2020, which takes into account vertical land motion from seismic activity as well as historical tide records, I am struggling to comprehend how the **2021 ‘Coastal Hazard Assessment for the Christchurch District,’** a summary report commissioned by CCC, took no account of these definitive findings, and instead confidently predicted in their CCC report videos:

** CCC Hazard Report: In 100 years sea level will rise by up to 1.4 metres.*

Dr Paul Denys and colleagues’ research paper findings ‘Sea Level Rise in New Zealand however were in direct contrast to the above CCC report.

** Their research paper states: In 100 years sea level will rise 15 centimetres.*

As a ratepayer with basic science education, I have noted the above anomaly after only a few hours of reading. It now seems that Managed Retreat policy, using **RCP 8.5 H+ worst case scenario modelling**, is being developed and imposed in some cases on local bodies by Regional Councils, DoC, MfE and NIWA. It is thus of great concern that, as directed by government bodies, whole regional council departments with scientific advisers adopt implausible data which lead to policy planning unfit for purpose, with consequent wasteful expenditure by councils, which then inflict unnecessary so-called mitigation policies on ratepayers, further exacerbating debt.

Regional councils are required to use reliable science and act in the best interests of ratepayers, not adopt **RCP 8.5 or 8.5H+ extremes with 0 - 1% probability.**

MfE AND NIWA PROMOTING RCP 8.5H+EXTREMES

It is of concern that the Ministry for the Environment, in concert with NIWA projections, appears to be promoting to councils extreme and preposterous scenarios, seemingly ignoring the IPCC recommendations for **likely scenarios, rather than the use of unlikely scenarios** for council planning.

<https://newsroom.co.nz/2024/03/20/govt-warns-councils-against-picking-extremes-in-climate-decisions>

Simon Court, under secretary for RMA reform, has warned councils not to legislate for extreme climate, or worst case climate increases into decision making:

‘He is criticising councils like Auckland for insisting landowners and developers design for an “extreme” 3.8°C temperature rise,’ and cites Professor David Frame, who as a lead author in IPCC reports, is quoted:‘

*'Frame says that decision undermines its (Auckland City Council's) credibility, **puts the council at risk of legal challenge**, and could impose added costs on developers and ultimately, the community.*

CCC UNWISE TO ADOPT IMPLAUSIBLE SEA LEVEL AND CLIMATE DATA

It would be unfortunate to see the use of **implausible sea level data** produce a similar outcome for a CCC coastal policy decision as occurred for Kapiti District Council, thus exposing citizens to inflated expenditure and the council to potentially litigation due adoption of extreme scenarios which would inevitably be proven inaccurate, and which have been advised against by the IPCC.

RECOMMENDATIONS FOR CCC COASTAL HAZARDS ADAPTATION PLANNING TEAM

I therefore make the following recommendations to the CCC Coastal Hazards Adaptation Planning Team.

- * Task Dr Willem de Lange with production of a Coastal Hazard Risk Assessment for the Canterbury Coast, similar to his authoritative Kapiti Coast Assessment as appended below.
- * Implement research findings of geoscientists Denys et al: **Sea Level Rise in New Zealand etc.**
- * Abandon previous inaccurate reports based on extreme predictions.
- * Cull all policy using RCP 8.5 or RCP 8.5H+ extremes using modelling with 0 - 1% probability.
- * Cull all 'managed retreat' policy which uses fanciful geoscience data.
- * Use reliable science / Denys Research paper: 1.5mm annual sea level rise in planning policy.
- * Withdraw usage of the non-statutory Coastal Adaptation Plan (CAP).
- * Use statutory Coastal Policy Statement / Coastal Hazard Risk Statement.
- * Revert to historically accurate tide gauge data in support of CPS / CHR.
- * Cull staff from all phases of unscientific 'managed retreat' policy planning.
- * Expect personal litigation on planners who wilfully impose implausible policy on ratepayers.

Susan Thorpe

Christchurch

17 November 2024

I wish to be heard in support of this presentation.

REFERENCES:

https://www.cru.org.nz/files/ugd/61e175_0f848831b2d44c8c9e4763458e922ece.pdf Dr Willem de Lange: Coastal Hazard Risk Assessment for the Kapiti Coastal-Hazards-Assessment

Sea Level Rise in New Zealand: The Effect of Vertical Land Motion on Century-Long Tide Gauge Records in a Tectonically Active Region. Paul H. Denys, R. John Beavan, John Hannah, Chris F. Pearson, Neville Palmer, Mike Denham, Sigrun Hreinsdottir.

<https://newsroom.co.nz/2024/03/20/govt-warns-councils-against-picking-extremes-in-climate-decisions/>

<https://realitycheck.radio/replay/salima-padamsey-chair-of-cru-kapitis-coastal-hazard-planning-has-the-moe-been-misreading-the-models/>

<https://realitycheck.radio/replay/salima-padamsey-spokeswoman-for-kapiti-coastal-ratepayers-united-conclusions-of-report-on-kapiti-coastal-risks/>

<https://www.stuff.co.nz/national/115193366/people-roads-and-billions-in-assets-vulnerable-to-climate-change-related-floods>

Submission on the Coastal Hazards Draft Adaptation Plan

To: Christchurch City Council
53 Hereford Street
Christchurch

Attn: [REDACTED] Engagement Advisor

Email: letstalk@ccc.govt.nz

Submitters:

Name	Property affected by the Plan	Contact details
Martin Jay and Verity Scarlett	[REDACTED]	[REDACTED]

Wish to be heard: Yes, we would like to be heard in support of our submission

INTRODUCTION

1. We are long term residents and community members of Port Levy and have lived on Wharf Road for 25 years. Wharf Road is the only access to our homes. **Figure 1** below shows all the properties affected by the proposed closure of Wharf Road.



Figure 1: Properties affected by Wharf Road closure in the Plan

2. As we mentioned we have lived on Wharf Road a considerable time, during which we have built a tight-knit community, not just on Wharf Road, but with the whole Bay of Port Levy.
3. Wharf Road is not only used by residents, but also by farm workers, Airbnb operators and their customers, stock trucks, friends, family, walkers, bikers, NZ post and visitors. As residents and ratepayers, there is a legitimate expectation to be able to use and access our properties and farms via Wharf Road. This is our only access and as such, our only option to be able to receive emergency services for medical and/or fire emergencies. We would never anticipate nor accept the loss of Wharf Road.
4. We acknowledge climate change and its effects in the future, however we do not consider the Council has received the feedback from all stakeholders and residents in the Port Levy community, namely the residents of Wharf Road, due to lack of consultation.
5. The only equitable way to move forward is to go through a process of consultation to allow this feedback to form part of the decision-making process.
6. We make this submission in opposition of the preferred pathway to close Wharf Road in the Coastal Hazards Draft Adaptation Plan (the **Plan**).

SUBMISSION

Breach of natural justice - Lack of consultation with residents on Wharf Road side of bay

7. While it appears that the Council has done a considerable job of consulting with the various groups and communities, they have either missed our side of Port Levy or have only made contact with a small number of Port Levy residents who they believed represented the views of the whole community - including the residents of Wharf Road. This is not the case.
8. The nature and degree of consultation should occur with the residents on whom the burden and effects of the proposed change falls heaviest.
9. At a meeting of the Port Levy Residents' Association on the evening of Sunday 10th November, a unanimous resolution was passed supporting that the Council consult with Wharf Road residents directly on the Plan before any decisions are made.
10. The Council has focussed too heavily on the community on one side of the bay and consequently has overlooked the rest of the community on the other side. The Wharf Road community is particularly affected, given the document contemplates "Wharf Road Closure" – and while Port Levy operates as a functioning community as a whole, this particular consultation needed specific consultation with the Wharf Road subgroup because of the anticipated high impacts.
11. The Council has failed to consult all necessary and directly affected parties, which only came to light recently. Therefore, the Plan is flawed, and the part that relates to Wharf Road should be withdrawn or decided on at a later date, once proper consultation and alternatives have been investigated.

Cultural and historical significance

12. The Council has identified cultural significance of Port Levy (the right side of the bay) but has failed to consider the cultural and historical significance of the area along Wharf Road. See excerpt below on the history taken from research undertaken by the University of Canterbury and a local business in the Port Levy area.

“Manaaki Mai is historically significant for Banks Peninsula, and New Zealand as a whole. The history is explored in this section, including the original owners of the area, why they sold the property, the creation of the Old Port Levy road, and the subsequent buildings.”¹

13. The failure of Council to consider the cultural and historical significance is further reason as to why the preferred pathway identified in the Plan for Wharf Road should be reconsidered.

Sea level rise

14. Wharf Road is approximately 2.9km long with approximately 2.4km of it sitting around 5 metres above sea level. See **Figure 2 and 3** below.



Figure 2: Wharf Road incline from out 41 Wharf Road looking left.

¹ Manaaki Mai, Creation of Old Port Levy Road and the subsequent buildings, <https://manaakifarm.weebly.com/history.html>.



Figure 3: Wharf Road heading north with incline around the Bay (yellow arrow).

15. We consider the main risk of Wharf Road is actually erosion from the inland side rather than sea level rise. This would mean, for Wharf Road to be maintained, approximately 2.4km of hillside that would need to be protected from erosion/rock fall. This corresponds to the circled area in **Figure 4** below.²



Figure 4: Wharf Road (left of bay), pink line that indicates area potentially prone to erosion that is the main vulnerability of Wharf Road, not sea level rise.

16. We are supportive of finding an engineering solution to this issue, which the Council will need to address in a similar fashion for many of its Peninsula roads with geotechnical issues.
17. The leap to road closure before exploring Geotech issues is:
 - a. Inconsistent with the Council's general approach to roading on the Peninsula;

² Page 6, image of current sea level rise, Adapting to sea-level rise, Koukourarata Port Levy, 2023.

- b. Fails to have regard to the impacts of closure, and the need to weigh these up against the impacts and expectations of residents and road users;
-
- c. Made on a preliminary basis before the science and costs of erosion control have been evaluated; and
 - d. Leads to no pathway which might allow for adaptive management of the Wharf Road area as engineering solutions can change over time.
18. Has Council assessed this risk and the costs of mitigating it as an alternative option to closing the road? Has the Council evaluated alternatives such as limited access roads/ weight restriction limits/ 4WD access that would enable the road to remain open for residents?
 19. We consider the above alternatives have not been assessed as viable options, which they should be. Cutting off a community to their one and only access should not be taken lightly, and all options should be considered with the input from the residents affected, which in this case has not happened.

Expectation when purchased properties that it would have access

20. Every resident who has bought and invested to live along Wharf Road had an expectation when they purchased their property that they would have access to it.
21. As discussed in the previous section, cutting off a community to their one and only access that they have had for over 150 years without appropriate consultation to those affected is a considerable oversight.
22. Farms and AirBnB's³ have been established along Wharf Road, and the effects on people's businesses and livelihoods hang in the balance.
23. The Council's revised document following a hearing needs to address options for on-going access on a permanent basis.

Potentially landlocked land

24. The closure of Wharf Road would mean the properties shown in **Figure 1** above would be landlocked. What is Council proposing to provide residents with alternative access? Surely this needs to be identified and the alternative access formed first prior to any decision on any road closures.
25. There are two paper roads, namely the Old Port Levy Road, which is partially formed, and Field Roads that could potentially join over the hill to Purau. Is this an option Council has considered to ensure our community is not landlocked? What are the costs involved with this and will this be included in the funding and financing table of the Plan?
26. It appears Wharf Road is the only asset without any funding⁴. It seems outrageous that the community using Wharf Road, rate paying residents are worth less and not worthy of any funding or financing compared to for example, public toilets. Is this how Council views their residents and ratepayers?

³ According to the AirBnB website, there are three AirBnB's along Wharf Road. ⁴ Page 79, Funding and financing table, Draft Coastal Hazards Adaptation Plan.

27. The document provides no reassurance to residents on the precise meaning of what “Closure” means under the Adaption Plan. By its very nature, Adaption encompasses the notion that solutions can be determined over time, as the Coastal environment changes – but for Wharf Road residents there is the ongoing threat of closure, rather than adaption.
 28. Again, this threat is inconsistent throughout the Port Levy community.
-

Emergency access

29. The Plan contemplates that in an emergency, temporarily repairing roads may be undertaken by the Civil Defence Emergency Management team to ensure people’s safety. How is the Civil Defence going to repair roads, when the road is proposed to be closed?
30. Elderly people are particularly disadvantaged and this lack of access for emergency services could realistically lead to death. How are the residents, farms and animals, visitors in the area supposed to get emergency assistance when Council is proposing to close the roads?

100 year timeframe - Rural roads closing due to potential sea level rise

31. While we do not dispute climate change and the potential effects this has in the future, we do not consider the Council should be predetermining the outcome for 40 years’ time, when the science is so uncertain. A pragmatic approach is required with flexibility for all options to be considered at the appropriate time.
32. We find that the proposal for Wharf Road is premature. Surely the issues of coastal roads will be addressed nationally so that standard policies can be adapted by Councils in relation to the issue of sea level rise.
33. There are a lot of rural roads along the coastline throughout New Zealand that will be affected, and therefore planning should be undertaken now to make sure they still have the necessary access to continue to access their farms, homes and livelihoods.
34. It is generally accepted that rural communities are resilient, and we are, however, cutting off our access goes beyond resilience. We may be few in numbers, but our contribution to the community of Port Levy should not be marginalised.

Procedural fairness – Pa and Fernlea Road vs Wharf Road

35. The Council have been told by the community of Port Levy that they don’t want to see it cut off due to road issues. That the roads, “*Purau-Port Levy Road, Fernlea Point Road, Pa Road are local roads that provide important access to Koukourarata Port Levy.*”⁴ We do not understand why Wharf Road has been excluded from this statement as the residents along Wharf Road are just as much a part of the community of Port Levy as those who live near the wharf and therefore should be provided with the same level of access.
36. Pa and Fernlea Road and Wharf Road are all classified as local roads under the Christchurch District Plan and so should be treated the same.

⁴ Page 5, Adapting to sea-level rise, Koukourarata Port Levy, 2023.

37. As can be seen in **Figure 5** below, Wharf Road can be maintained with minimal funding, considerably less than Pa and Fernlea Road since it is unsealed. Quarrying local rock to raise sections of the road would be a saving rather than bringing fill from further afield.



Figure 5: Wharf Road condition, unsealed.

38. Council has unfairly decided that due to a numbers game, Wharf Road and consequently its residents, are second class to those along Pa and Fernlea Road.

RELIEF SOUGHT

39. Reject the preferred pathway proposed by the Plan to close Wharf Road.
40. The Council to allocate the required funds to preserve access via Wharf Road and to treat the community of Port Levy equally on both sides of the bay.
41. For Council to not create landlocked land and to continue to provide access along Wharf Road or to provide alternative access for the community along Wharf Road.
42. Allow for adaptive solutions to be developed over time, rather than prematurely determining the fate of Wharf Road and its residents.
43. Define what closure means for those residents and provide for an adaptive pathway of continued access, rather than closure.
44. The Council has failed to consult all necessary and directly affected parties, which only came to light recently. Therefore, the Plan is flawed, and the part that relates to Wharf Road should be withdrawn or decided on at a later date, once proper consultation and alternatives have been investigated.

45. Council to consult with the residents and affected parties along Wharf Road, assess the cultural significance and detrimental effects of closing Wharf Road before making recommendations that are workable and appropriate, not just cost effective.

OTHER COMMENTS

46. We have been in contact with the Council over the last few weeks to arrange a meeting to discuss the adverse effects of the Plan to the residents of Wharf Road. We have been unable to meet before the close of submission on 17 November 2024. We therefore reserve our right to provide additional comments to our submission until such time a meeting with Council has taken place.

Submission on the Coastal Hazards Draft Adaption Plan (CHAP)

To: Christchurch City Council
53 Hereford Street
Christchurch

Attention [REDACTED] Engagement Advisor

Email: letstalk@ccc.govt.nz

Submitter: C J Crow Family Trust (Christopher John Crow, Trustee) of [REDACTED]

Address for Service: Christopher John Crow [REDACTED]

Wish to be Heard: Yes, I would like to be heard in support of my submission.

INTRODUCTION

1. I live at [REDACTED] My trust owns that property and also the farm at [REDACTED] moved to Port Levy when my parents purchased the farm in 1984 (i.e. 40 years ago).
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 submitters.

Concerns with Proposed Potential Recommendation to close Wharf Road

3. My concerns with the proposed recommendation to close Wharf Road are as follows:
 - a. There has been a complete failure by the Council or the members of the Coastal panel to consult with any residents or owners of Wharf Road before the recommendation has been made. In my view that is fatal to the recommendation and as such ultra vires as it constitutes a breach of natural justice/procedural fairness. The Council needs to start again and actually consult for that part of the plan that relates to Wharf Road and formulate a new recommendation.
 - b. At the moment the proposal for Wharf Road does not provide any alternatives. This is clearly unacceptable. Clearly the Council does not want a situation where a property owner is left landlocked and has to take other measures (or make a claim against the Council) for the failure to provide access. Wharf Road has been in existence for 150 years. The part that is potentially susceptible to sea level rise is only approximately 400 metres long. There are several alternatives that could be made as opposed to merely (as proposed in the plan) reducing the levels of service and ultimately ending them so that the road is closed.
 - c. The Council needs to investigate what is the most cost-effective way to continue to provide access to owners of properties that use Wharf Road. There are several options available. For example, the road could be moved further inland, access could be via Old Port Levy Road (it has been partially formed and then could continue through private property to Purau Port Levy Road).
 - d. It is realistic to put rock and other fill on the existing barrier at the front of Wharf Road so that access can be provided for a much longer period. As mentioned, the length of the road at stake is only 400 metres. It should not cost much to do what is necessary to preserve access.

- e. People with knowledge of this field have told me that the flood modelling in the plan is overstated. It appears to be a worst-case scenario. Why should a recommendation on a worst-case scenario be made when no one really knows what is going to happen?
- f. At a minimum, the Council is required to consider alternatives. In the future an option before the road is potentially likely to be regularly flooded because of sea level rise, the Council could seal it. This would be a viable alternative so the road could then be available for access during time where it is not high tide. This clearly is preferable to a blanket assertion that in the future the road is merely closed with no alternatives for access to people who own land that have access via Wharf Road.
- g. I have previously farmed at [REDACTED]. The farm is now leased to my neighbour Richard [REDACTED] of [REDACTED]. The farm provides valuable economic benefit. It would be impossible to farm my farm without legal access being available to it for stock trucks, etc for the movement of stock. Unless access is available via Wharf Road stock could not be moved off my property, whether that be by the property owner or someone leasing it.

I also have an Air B&B on my property and plan to start another one. If the road is closed in the future then clearly I would be unable to continue those businesses.

While I live in Port Levy, I travel to Christchurch for work as a lawyer. My children also go to school in Christchurch. If the road is closed (and this applies to any future people who live at the property, including my children and their children) then those children would not be able to go to school.

- h. My house at [REDACTED] is at least 60 metres above sea level. There is no risk of it being subject to sea level rise. It has never also been the subject of flooding from extreme weather events. There have been occasions where other properties on the peninsula have been subject to flooding (e.g. Le Bons Bay and Goughs Road in 2021). This was because of an extreme weather event, not the result of sea level rise. This is also a potential flow on effect of climate change, although these types of events have always occurred historically (e.g. 1968 Wahine storm). Why should the Council fund that type of work for Le Bons/Goughs Bays from operational budgets that only serve a very limited number of properties whereas they appear to contemplate not doing the same for the road access that is needed for Wharf Road residents?
- i. I confirm that no one from the Council or the Coastal panel have ever approached me about the proposed recommendation to close Wharf Road. The only way I found out about it was because of an acquaintance at the local golf course who gave me a copy of the proposed plan. Without that happening, potentially all residents of Port Levy would have been subject to a recommendation being approved by Council that no one knew about. This could have resulted in the Council merely adopting the recommendation in the plan without any consultation whatsoever.

Relief Sought

- 4. In summary, the only thing in my view that can be done is to start again for that part of the road that relates to Wharf Road. The Council has a legal obligation to consult - this hasn't happened. There must be actual consultation before any recommendation is made.
- 5. A cost benefit analysis should also be undertaken and research done about the alternatives that are available instead of the current recommendation that is to merely to close the road.
- 6. The CHAP does not put enough emphasis on the importance of roading infrastructure. Surely roads should be considered of greater importance than maintaining walkways, replacing wharves or toilets? The part of Wharf Road susceptible to sea level rise is only 400 metres long. It should not cost an excessive amount to continue to provide access if alternatives are considered.

7. For the reasons outlined in this submission and the Wharf Road residents group submission, that part of the plan that relates to Wharf Road should be withdrawn. The Council needs to start the process again for Wharf Road following actual consultation with affected residents and consideration of alternatives. I note this was effectively the unanimous resolution of the Port Levy Residents as a result of meeting on 10 November 2024 to consider the plan in relation to Wharf Road.

Christopher John Craw – Trustee CJ Craw Family Trust

14 November 2024

Submission on the Coastal Hazards Draft Adaption Plan (CHAP)

To: Christchurch City Council
53 Hereford Street
Christchurch

Attention: [REDACTED] Engagement Advisor
Email: letstalk@ccc.govt.nz

Submitter: White Light Trust (Andrew and Wendy Oh, Trustee) of [REDACTED]

Address for Service: Andrew Oh - [REDACTED]

Wish to be Heard: Yes, We would like to be heard in support of our submission.

INTRODUCTION

1. Our trust owns the property at [REDACTED]. We purchased the property in November 2021.
2. We are writing to express our strong objection to the proposed road closure of Wharf Road. As residents, we are deeply concerned about the lack of consultation and the significant impact this closure has on our community.
3. As residents, we are also part of the group submission that has been filed by the Wharf Road, Port Levy residents, we support the approach that has been taken in that submission. Additionally, we wish to raise other points, some that are personal to us and not necessarily common to the group submitters.

Concerns with Proposed Potential Recommendation to close Wharf Road

4. We are writing to formally object to the proposed road closure of Wharf Road, Port Levy. This decision has raised significant concerns within our community, particularly regarding the lack of consultation, the ultra vires nature of the process, and the breach of natural justice principles.
5. The decision to close Wharf Road was made without any consultation with the residents and businesses that depend on this road. Effective community engagement is essential for such impactful decisions, and it appears that this process was not followed. The absence of proper consultation has left us feeling unheard and disregarded.
6. The process by which this decision was made appears to be ultra vires. The Council's actions seem to exceed the legal powers granted to it, raising serious questions about the legitimacy of the proposed road closure. It is crucial that all decisions made by the Council adhere strictly to the legal framework and respect the limits of its authority, particularly on road closure and landlocking properties.
7. The manner in which this plan was drafted in respect of Wharf Road constitutes a breach of natural justice. The principles of natural justice require that decisions affecting the community be made fairly, transparently, and with an opportunity for those affected to be heard. In this case, these principles have not been upheld, resulting in a decision in the draft plan that is both unfair and unjust.
8. We purchased the old weatherboard cottage at [REDACTED]. We have undertaken a considerable renovation, sympathetic to the era of the building. As part of this renovation, we added a separate garage to the property. There were considerable discussions between our

architect and Council on the height of the garage floor re flooding. It is utterly perplexing that the issue of the road closure was not raised during any of these interactions with Council, particularly when the issues of flooding were being discussed. At that time, it is reasonable to believe that all relevant factors and potential impacts were being considered. The omission of any mention of a possible road closure or the impact of the draft plan during those discussions suggests a lack of transparency and raises serious questions about the decision-making process.

9. Additionally, it is concerning that we understand consultation occurred with other parties but not with those most impacted by the closure. This oversight has resulted in a decision that does not fully consider the needs and concerns of the most affected community members. Surely, if the Council had not heard a response from any residents of the small community most impacted, it should have taken steps to ask why.
10. Moreover, no alternatives were considered as part of the road closure decision. It is unclear why potential alternatives were not explored or presented to our community. Considering alternatives is a fundamental part of a thorough and fair decision-making process, and the failure to do so further undermines the legitimacy of this decision.
11. Lastly, we want to stress that being a small community does not mean we are irrelevant. Our voices and concerns are just as important as those of larger communities. The impact of this road closure on our daily lives and local businesses is significant and cannot be overlooked.

Relief Sought

1. Reject the draft proposal for the closure of Wharf Road
2. Explore and present viable alternatives that do not landlock properties that result in inequitable and arbitrary loss of value of properties, including for our neighbours, the lack of recognition on the ongoing generational dedication to the area and its viability as a revenue creating contributor to the Banks Peninsula and Canterbury area.
3. Consider adaptive solutions rather than those based on modelling and data that is forecasted and unconfirmed.
4. Conduct a fair and transparent consultation process with those most impacted by the closure.

We urge the Council to reconsider this decision and to engage in a thorough and lawful consultation process with the affected community members. It is essential that our voices are heard and that any future decisions are made transparently, fairly, and within the bounds of the law.

Having an opportunity to raise these issues at a hearing falls short of Council's obligations to our community. A full consultation process as part of the drafting of the plan is what is required so the draft plan itself is a proper reflection of a decision based on a consultative process.

Thank you for your attention to this matter. We look forward to your prompt response and a resolution that addresses the needs and concerns of the community.

Submission on the Coastal Hazards Draft Adaption Plan.

To Christ church City Council
53 Hereford Street
Christchurch

Attn: [REDACTED] Engagement Officer

Email: letstalk@ccc.govt.nz

Submitter: Philip and Jane Helps. Residents of Port Levy.

As long-term residents of the bay, more than 70 years, I wish to make the following comments,
Firstly, we oppose the preferred pathway to close Wharf Road in the Coastal Hazards Adaption Plan.

Roading is historically, the core function of all councils to provide and maintain a roading network for its rate payers and general public.

Over the years we have seen no evidence of sea level rise, nor is there any factual evidence to support the necessity for such measures as proposed in the plan, in particular Wharf Road.

The proposed plan contains no factual evidence of sea level rise being caused by either global warming or through the possible result of seismic activity. Nor is any data evident to the existing road levels, above mean high water mark.

The plan identifies the areas of the possible incursion, such areas appear to be developed by a desk top study only, with no evidence of ground truthing data.

Also, I note the working party did not include an Oceanographer, whose input and expertise would be a priority for this exercise to have credibility.

To date, we have had no consultation from CCC or its agents regarding this proposal. Council has both a legal and moral duty to consult directly with principle affected parties, prior to the Council endorsement and public submission.

We understand that the CCC has already consulted directly with the Koukourarata Runanga, so why not the Port Levy Residents Association. Their members are the people who live permanently within the bay, not the occasional visitor. Please note; The majority of the Runanga members are not permanent residents of the bay.

A consequence of this proposed plan being endorsed by CCC, then if adopted, will immediately effect the lives and financial viability of the host community, already insurance companies are adjusting premiums, property values will diminish, fire and medical services compromised, investment of existing businesses ruined.

Should the proposal become adopted by the CCC, it would be deemed a "Regulatory Taking", then full compensation will be sought.

Background data:

The distance of potentially effected road is the first approximately 400 meters has of a total length of Wharf Road being some 2.9km, which over the years has been actively maintained by previous local bodies.

This road services to 9 dwellings, numerous businesses along with access to two legal and formed off roads, i.e. Fields and Craws, plus around 36 titles.

Historically Wharf Road was the main road providing access to the only wharf from which all goods and services incl. freight, mail and livestock moved to and from. The original storage building (still complete) and surrounds has Historic / Heritage Values.

Protection from sea surge during a cumulation of spring high tides, coupled with effects of offshore low depression was recognised as early as the mid-20s when protection was first installed. This took the form of up to two rows of piles cut from local timber and driven by hand into the substrate some distance out from the high-water mark. Purpose, a very effective way to reduce the energy of the wave action. Remains being still visible today. Since then, councils have occasionally boosted protection with rock and soils generated from works within the bay, giving good adequate protection. At a glance, I suggest the road is on average, over one meter above Mean High Water. There are no more incursion events onto these roads now, than there was in the 50s.

Surface flooding from weather events, causing damage to roading is far less frequent now than years past. The biggest event I recall was in 1968 when 26 inches 650mm fell in a one-week period, obliterating most bridges, power supply, phone service and blocked roads. We learnt from that experience that we can survive without power and phone but the inability to access the roading network was a major obstacle for recovery.

Over the recent years, all materials both rock and soils from road repairs and maintenance, get stockpiled then transported out of the Bay to an unknown destination, at presumably a huge expense. This material should be utilised within the bay, i.e. for building up a causeway as and if required. Also to be noted, should extra hard fill be required for roading requirements in the future, ample resources are available within the bay.

Relief sought; That the council consult with the residents and affected parties to explore and develop a practical solution that ensures the continued access for the resident and public users of Wharf Road. This process be actioned immediately.

Other comment.

We wish to be heard.

We endorse the Port Levy Residents Ass. Submission.

Signed;

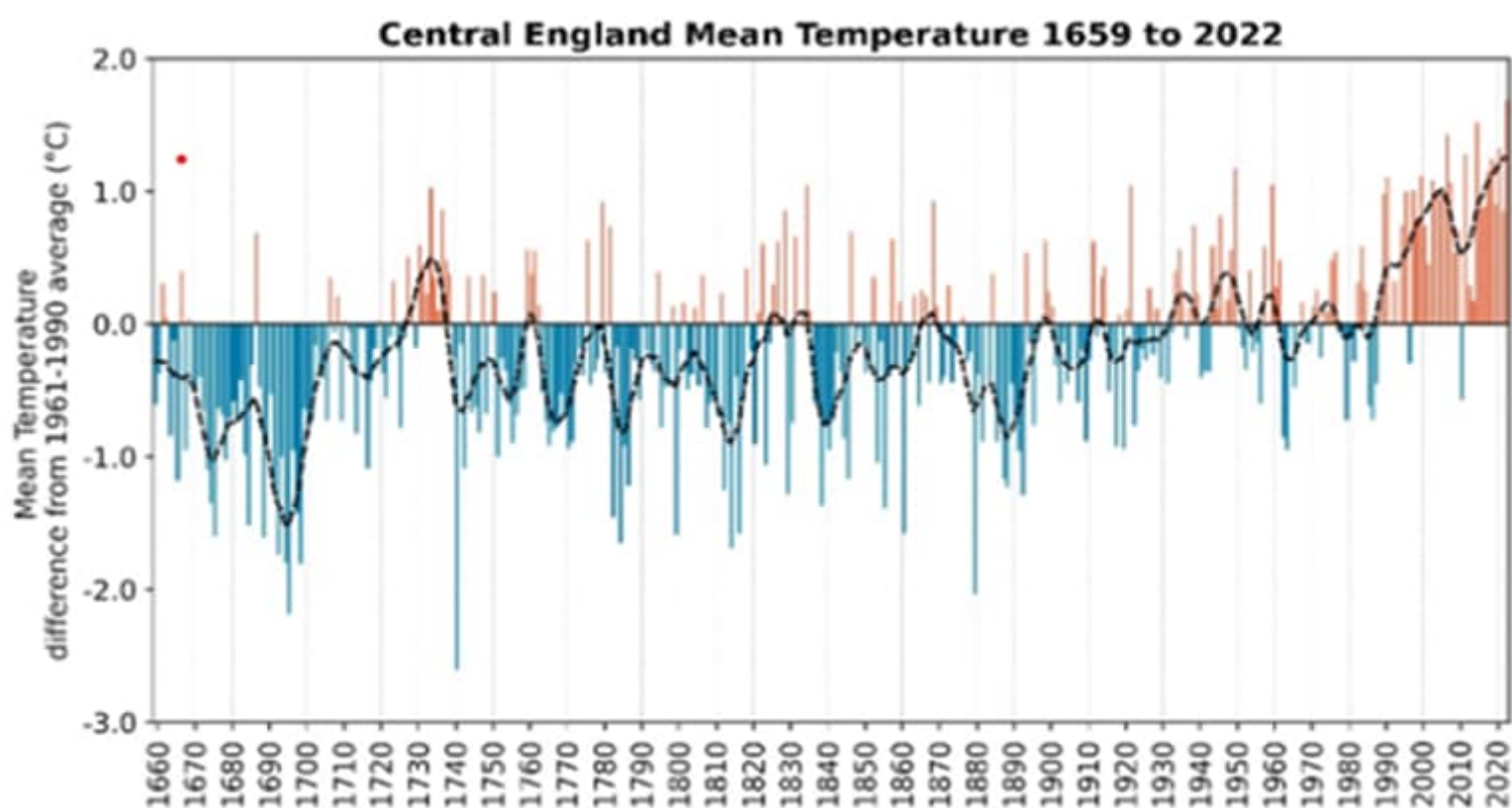
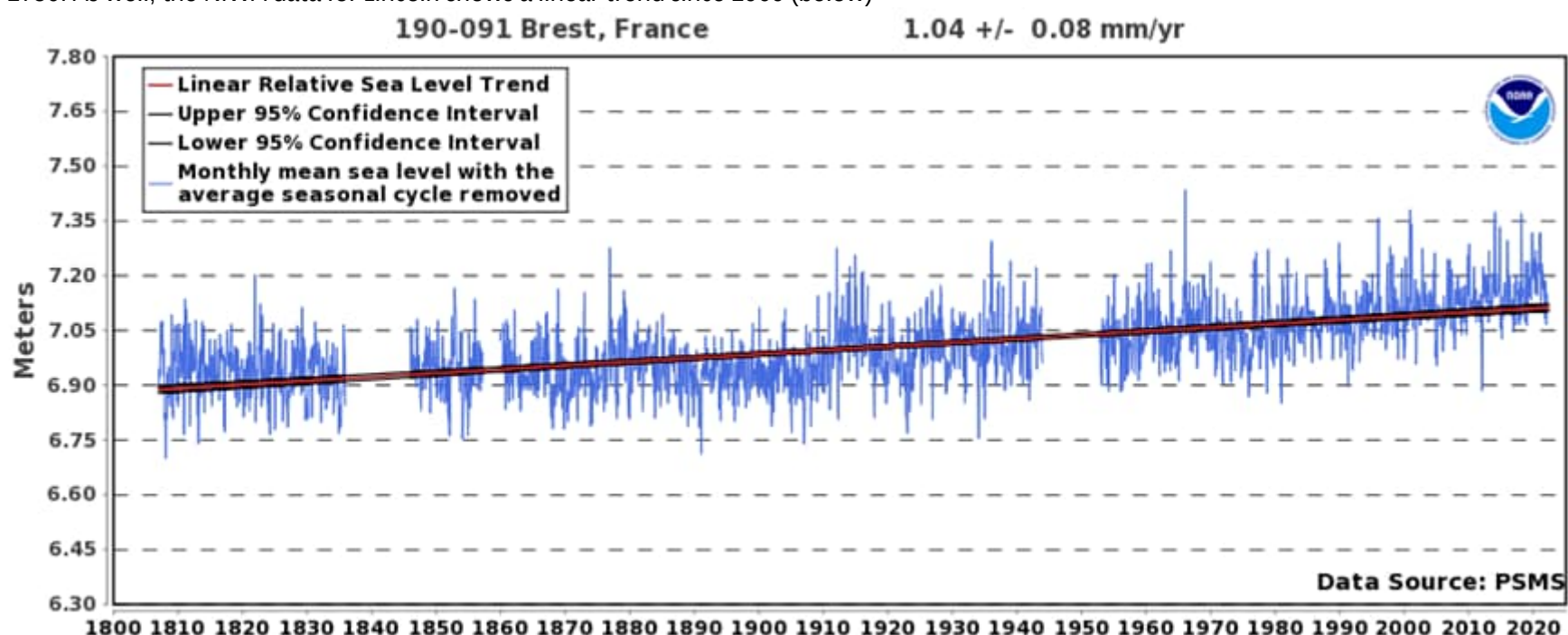
Philip D Helps

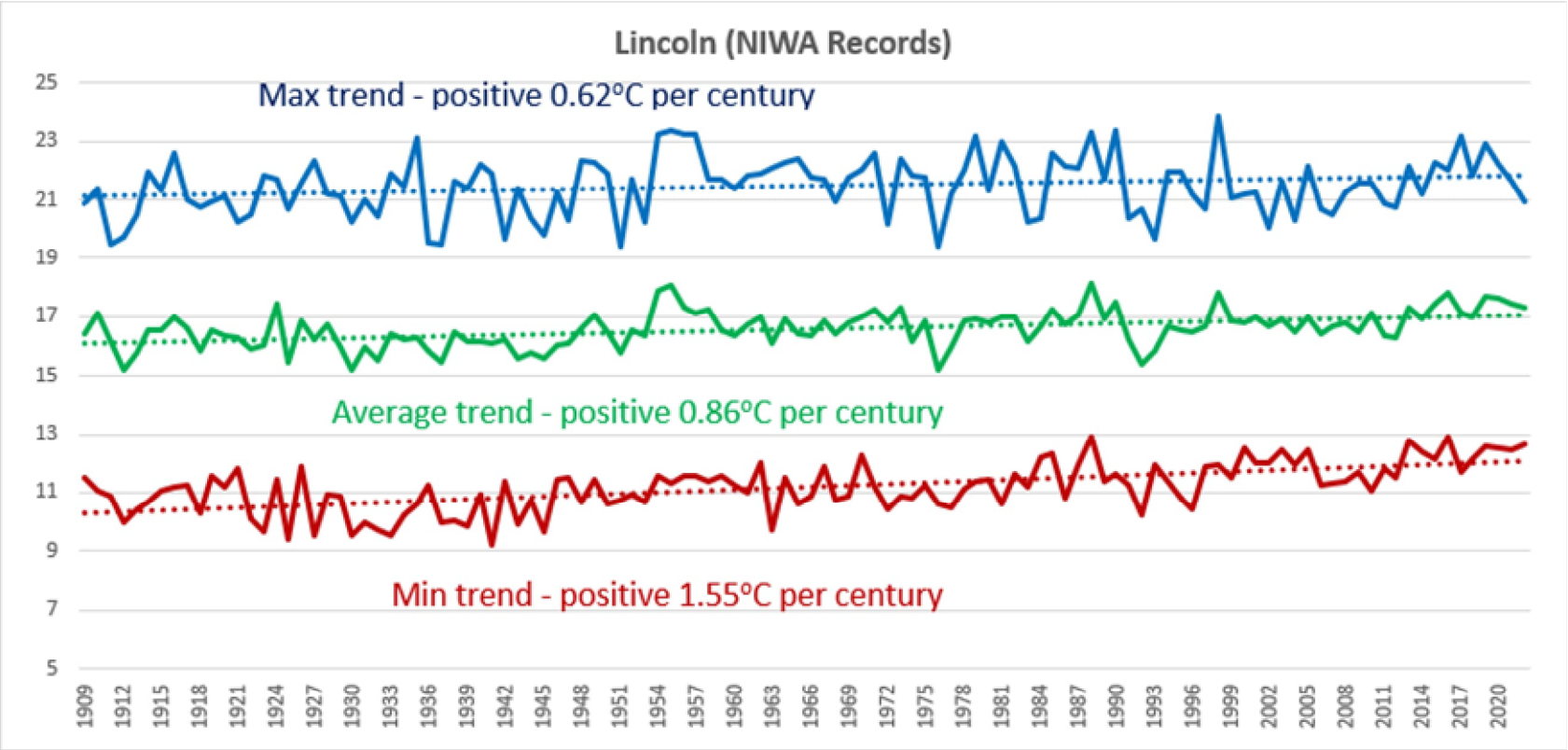
Jane C Helps

From: Ian and Stephanie McIntosh
Sent: Sunday, 17 November 2024 1:58 pm
To: Lets Talk
Subject: Draft Adaptation Plan

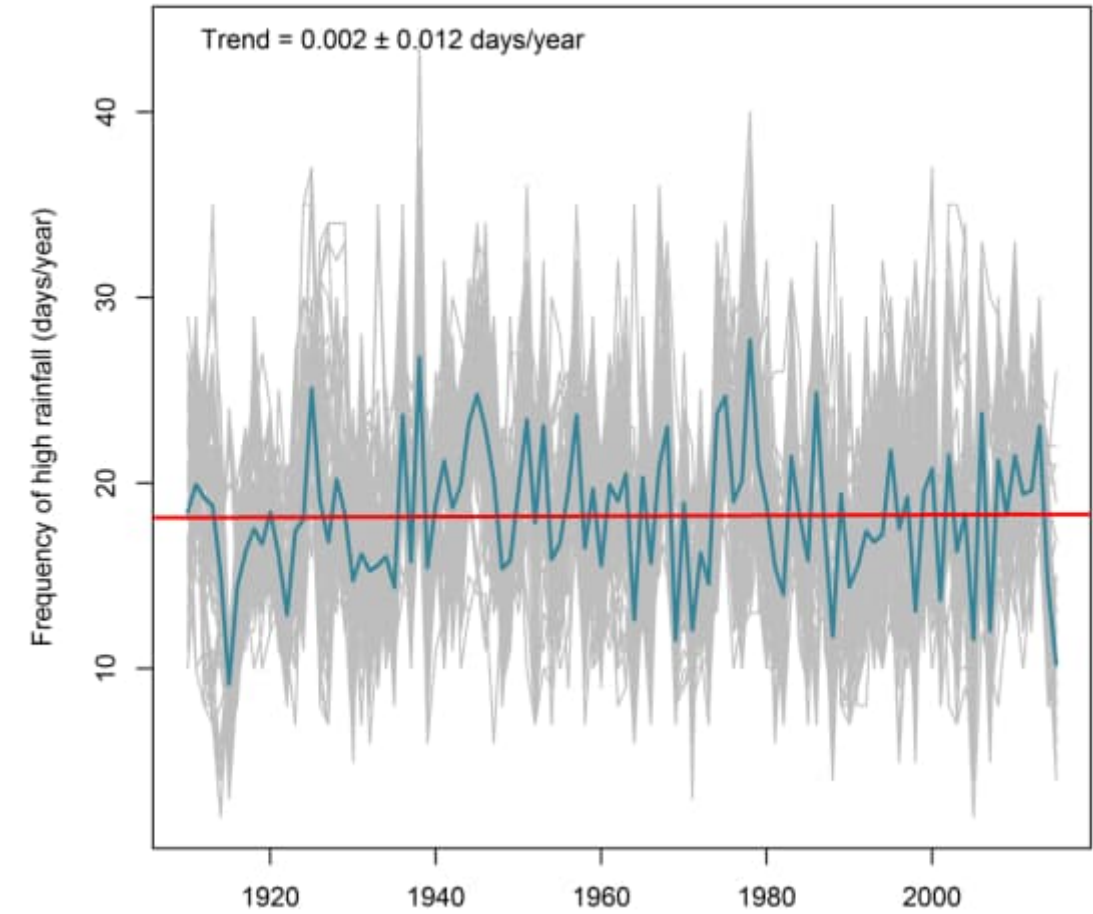
Dear [REDACTED]

I am contacting you as I did last year. This whole approach denies the chance for people to express alternative science. Instead you discard people with alternative & sound evidence that your statements on sea level rise are a gross exaggeration & you hide behind the IPCC claims. If you were really interested in truth, you would provide a forum for people like me to show the real evidence like the linear increase since 1807 in France. This follows the same trend in temperature increase for the oldest temperature records in the world. They extend back to the end of the Little Ice Age and prior to the Industrial Revolution in 1750. As well, the NIWA data for Lincoln shows a linear trend since 1909 (below)





And all without an increase in average rainfall and variation in the last 100 years at Lincoln.



So where is your evidence for climate change and increases in sea level rise?

Sadly you won't let people like me have a forum with the decision makers but instead the false narrative is trotted out as happened again. In the end, the truth will prevail but sadly not before tax payer funds are squandered.

Sincerely
Ian McIntosh