



Form 6

Further submission in support of, or in opposition to, submission on notified proposed policy statement or plan, change or variation
Clause 8 of Schedule 1, Resource Management Act 1991

To Kaikoura District Council

Name of person making further submission: MARGARET EGAN

This is a further submission in support of (or in opposition to) a submission on:

Proposed Natural Hazards Plan Change 3

I am [state whether you are—

- a person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category; or
- a person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category; or
- the local authority for the relevant area.

I support (or oppose) the submission of:

[name and of original submitter and submission number of original submission if available].

I support the submitters numbered 1, 2, 6, 8, 9, 11, 13

I oppose the submitters numbered 10 and 14 (in part)

The particular parts of the submissions I oppose are:

[clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal].

Submitter 10 @ 10.10 and 10.4

Submitter 14 @ 14.5

The reasons for my opposition are: [give reasons].

The parts of the submissions which I oppose address the definition of High Flood Hazard Area.

Federated Farmers supports the adoption of the definition in CRPS and Ecan seeks to restate the definition as used by it in CPRS. This definition is based on a 500 year flood. The definition proposed by KDC in Plan Change 3 is different to that used in CPRS. It is not clear how changing the definition as sought by Ecan would affect the draft Plan consulted on.

It is not clear to me why Ecan is advocating at 500 year flood standard – or, indeed, any other standard. Ecan’s responsibility for natural hazards is described at p163, CPRS. It does not obviously include responsibility for flooding caused by rivers (as opposed to considering the use of land “within the beds of rivers and lakes...”). The responsibility for flooding appears to be that of KDC and I do not understand why Ecan is trying to control its decision making. KDC should be free to choose an appropriate flood standard. I have previously submitted that it should be a 200 year flood standard.

More importantly, I do not see any useful discussion in CPRS as to why Ecan has adopted a 500 year flood standard. This, of course, is an extreme event. The 1993 flood, even though it was a very significant event, bore no resemblance to that modelled by Ecan. The recent rain event, even though it was, too, significant, caused only minor flooding in Lyell Creek.

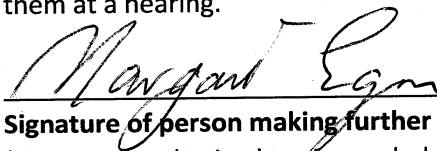
Finally, it is not clear to me why Federated Farmers then addresses rule 8.5.2 at all. This concerns the urban area.

I seek that the whole (or part [*describe part*]) of the submission be allowed (or disallowed):
[*give precise details*].

N/A

(Circle one) I wish ~~do not wish~~ to be heard in support of my further submission.

(Circle one) If others make a similar submission, I will/will not consider presenting a joint case with them at a hearing.



Signature of person making further submission

(or person authorised to sign on behalf of person making further submission)

Date 2 June 2021

(A signature is not required if you make your submission by electronic means.)

Electronic address for service of person making further submission:

Telephone:

Postal address (or alternative method of service under section 352 of the Act):

Contact person: [*name and designation, if applicable*]

Note to person making further submission

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.