

Name:

Margaret Egan

I could gain an advantage in trade competition through this submission.

No, I could not gain an advantage

I am directly affected by an effect of the subject matter on the submission that – (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition

Yes I am directly affected.

The specific provision of the proposal that my submission relates to are:

Page 5, Section Chapter 4

The definition of “High Flood Hazard Area” (and consequential references to this in Chapter 8)

My submission is:

Page 5, Chapter 4

Page 16, Rule 8.5.2

Page 18, Rule 8.5.6

I understand that setting natural hazard standards will involve a balance between risk on the one hand and practicality on the other. It cannot be the purpose of the exercise to set the risk standards so high (such that risks are reduced close to zero) that it rules out any possible scope for Kaikoura to exist. If that were so, then Wellington would be closed (for earthquake risk) and so would Auckland (for volcanic risk). The reality is that we have to accept some risk in our daily living. The purpose of the exercise must be to determine the appropriate level of risk.

In this case, I believe that an appropriate level of risk would be a 200 year flood event.

There is no basis for the Council to take a 500 year event as its standard against which to measure flood hazard. The 500 year return event can be compared with the 50 year life for a building under the Building Act. Obviously, most people hope their building will last longer than that but it seems disproportionate to provide for a 50 year life for a building and then restrict its use by reference to a 500 year flood event.

The 500 year return period selected for the relevant flood event amounts to some 16-20 generations of people living in Kaikoura – compared to the five or six since European colonisation. This is a grossly disproportionate standard.

During the time my family has lived in this house (100 plus years) there has only been one flood of significance which occurred about 28 years ago. The water came about half way up the property – roughly equal to the level of the farmland on the south side of the creek.

The 500 year return event can be compared with a 200 year standard adopted for Christchurch City Council and Selwyn District Council. I cannot understand why the Kaikoura District Council needs to take such an extreme view.

A 500 year flood event will inevitably have consequences for my insurance costs – indeed, assuming I can obtain insurance at all. My policy requires me to notify of any changed natural hazards designation. The City Council website acknowledges that increased hazard levels can have insurance consequences. Inevitably, I will need to increase rent to cover those extra costs – assuming I can get insurance at all. If I cannot obtain insurance I may need to leave the house empty (because the risk of tenanting it would be greater than the likely rental return).

Not only will a 500 year flood event have consequences for residential properties but it would seem inevitable that such a flood standard would restrict development along Beach Road and the downtown area. It would also affect the Council's own building, and the main highway and bridge over the Lyell Creek.

It seems to me that the Council, if it adopts a 500 year standard, is well on the way to closing Kaikoura down. Although the Council has postponed consideration of tsunami risk, taking a 500 year standard in that case will make most of Kaikoura unviable. The Council needs to think very seriously about that. There has to be a more sensible balancing exercise than that. Or does this Council wish to preside over the demise of Kaikoura?

I seek the following decision from the local authority:

I want the Council to amend the definition of "High Flood Hazard Area" so it is defined by reference to a 200 year flood rather than a 500 year flood.

I wish to be heard in support of my submission.

Yes

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Yes