



**Form 5**

**Submission on Proposed Natural Hazards Plan Change**

To: Kaikoura District Council

Name of submitter: **Guillaume LOPPE On behalf of Cargill Station Limited**

This is a submission on the following proposed policy statement (or on the following proposed plan change)

**Proposed Natural Hazards Plan Change**

1. \*select one: I could  or I could not  gain an advantage in trade competition through this submission.

2. \*select one: I am  or I am not  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

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

Section	
8.5.2 8.5.3 8.5.10 13.11.2 13.11.4 Nathaz DP maps series	<p><b>Submission:</b></p> <p>With regards to the rules referring to “<b>High Flood Hazard Areas</b>”. We believe that by not disclosing the <i>likely</i> physical extent of these areas, Council does not offer a reasonable enough level of transparency therefore not allowing ratepayers to understand the impact of such proposal as part of the consultation process. We believe there should be a High flood awareness risk overlay in that regards. We are therefore currently <u>opposed</u> to those proposed rules.</p>
8.5.4 8.5.6 8.5.9 8.5.11 8.5.13 13.11.2 Nathaz DP maps series	<p><b>Submission:</b></p> <p>With regards to the definition and mapping of “<b>Landslide debris inundation</b>” areas.</p> <p>Referring to GNS’ recommendations to consider whether or not the assessment carried provide sufficient information to underpin DP provisions, we note that their work “does not provide information regarding the likelihood of a given area being inundated with debris”. We also note that while this deterministic exercise (largely based on topography/Lidar-derived DEM) allows a very high level understanding or potential areas of interest in the District, it does not consider any parameter such as geotech, established vegetation, likelihood of a trigger event, etc. Those parameters should reasonably be considered in a district wide assessment before being used as a DP provision purposes, as strongly suggested by Council’s engaged experts in their recommendations.</p> <p>We believe that there is better value for money for the community in Council undertaking further “area-wide” assessment <b>focusing</b> on identified potential hazard zone in <b>urban areas</b>.</p> <p>We are therefore currently <u>opposed</u> to those proposed rules.</p>

<p>13.11.1 Nathaz DP maps series</p>	<p><b>Submission:</b> With regards to the definition and mapping of “<b>Liquefaction Hazard</b>” areas. We note that it is proposed that the same rules apply both to “Unlikely” and “Possible” liquefaction areas, and that discretion is given to council agents (and ultimately Council’s Geotech consultants) to determine the level of assessment required for each and every application. We are concerned about the lack of transparency this entails, the costs for the community, are generally <u>opposed</u> to this high level and all-encompassing approach and suggest that:</p> <ul style="list-style-type: none"> <li>- The 3 liquefaction zones are identified separately and that the level of investigation and assessment required to support an application to a “Controlled Subdivision Activity” <b>reflects</b> each of the <b>3 levels of hazard</b>, as per Golder’s report</li> <li>- <b>Pre-determined</b> investigations and assessment <b>specifications</b> are set by council for each of the 3 level of hazard, specifically: <ul style="list-style-type: none"> <li>o “Liquefaction damage unlikely – Standard procedure”: Procedure as outlined by NZS3604</li> <li>o “Liquefaction damage unlikely – Desktop assessment” areas require a desktop assessment using existing information, shallow investigation if required by suitably qualified engineer and geotechnical engineer input contingent on the desktop assessment (as per Golder’s recommendation)</li> <li>o “Liquefaction damage possible – Detailed liquefaction assessment” areas require the input from a Geotech engineer. There should be no mention of deep ground investigations and the methodology should be left to the Geotech engineer to determine. It would be expected that knowledge of ground conditions in the District would increase overtime and ultimately physical investigations would not be required anymore.</li> </ul> </li> </ul> <p><u>Note:</u> We strongly encourage Council that they have strong GIS/recording processes in place to ensure that the -expensive- intelligence produced over time builds into a Council owned database. This will require the Geotech reports mentioned above to be delivered in a specific format (suggest xls with GPS coordinates attached to physical investigations discoveries)</p>
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**I seek the following decision from the local authority:**

We are generally opposed to too high level approach to hazards identification and mapping and are willing to work with Council to bring the understanding of specific Ocean Ridge hazards to a level we deem reasonable and acceptable for the intent of using as District Plan provisions. We are currently undertaking desktop assessments based on previous comprehensive physical investigations to inform Councils’ mapping exercise and would want those findings to be reflected in the risks overlays ahead of the adoption of the proposed plan changes.

**\*select one:** I wish  do not  wish to be heard in support of my submission

**\*select one:** if others make a similar submission, I will consider presenting a joint case with them at a hearing. Yes  No



**Signature of submitter**

(or person authorised to sign  
on behalf of submitter)

**Date** 27.04.21

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

**Contact details for submitter:**

**Telephone:** 027 571 7399

**Postal address:** 43, lovers lane. 7300 Kaikoura

**Contact person:** William LOPPE

**Note to person making submission**

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.

After the closing date for submissions, the Council will prepare a summary of the submissions that must be publicly notified. There will be an opportunity for anyone to make a further submission in support or opposition to any submission already made. Council will then arrange hearings to consider submissions and further submissions that have been lodged. Any person who has made a submission and who has indicated that they wish to be heard will have the right to attend the hearings and to present their submission. Decisions will then be made. Any person who has made a submission has the right of appeal against a Council decision to the Environment Court.