

6 November 2015

Mr Simon Arnold  
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via email: [simon.arnold@arnold.co.nz](mailto:simon.arnold@arnold.co.nz)

Dear Mr Arnold

Thank you for your letter of 1 November 2015 and further comments about the Tonkin & Taylor Coastal Hazard Assessment Report (T&T report).

Much of the discussion is about the appropriate interpretation of the New Zealand Coastal Policy Statement 2010 and the Council's response to the challenge of land use planning in the context of climate change and sea level rise. The proposed District Plan provisions for coastal hazards, based on the mapping of the risk posed by coastal inundation and coastal erosion in the T&T report, have been withdrawn. The Council will introduce a Plan Change to address coastal hazards following the completion of the Christchurch Replacement District Plan. That planning response will be developed in consultation with the community and tested through standard Resource Management Act processes, potentially including the Environment Court.

You have provided further comment on the probabilistic approach taken by T&T and the treatment of uncertainty. While you consider this approach fails to adequately deal with the uncertainty in the estimates of the risk posed by coastal hazards, our internal and external reviewers are satisfied that it is appropriate. Again, these matters will be further tested through the proposed future Plan Change for coastal hazards.

You have also forwarded a paper by Joan Allin on the 'Kapiti Coastal Erosion Fiasco'. This paper addresses the planning framework and the proper interpretation of provisions involving probabilities and the use of terms such as 'likely' and 'potential' as well as 'precautionary'. It is an interesting discussion and as requested I have passed this on to the appropriate staff to consider.

Finally you indicate that your 'report' calls into question the Coastal Hazards Assessment Report and you consider that 'we need to agree a form of wording that should now be added to the LIMs'. In your earlier correspondence you enclosed an appendix titled 'Fitness for Purpose of *Coastal Hazard Assessment Stage Two* (Tonkin and Taylor 2015) for use in developing coastal management areas and determining LIM annotations.' In your covering letter you note that this report *has just been put together on a pro-bono basis in amongst other priorities, so has had none of the care and attention or other professional input one would expect from a professional study. It is very much E&OE and leaves much to be desired in terms of general finish.*

While we appreciate the time and effort you have put into this matter we do not consider your report to be of direct relevance to the information required to be put on a LIM. As we have noted previously, the Council is confident of the material it has received, and has modified its LIM statements to reflect the nature of the information available. The purpose of the LIM is not to become a forum for competing ideas and accordingly we do not think it helpful to reference your report.

However when Council recommences the work on the coastal hazard provisions, your ideas - together with further reviews - can be usefully and helpfully included in the process as part of ensuring the Council establishes the most appropriate response.

Thank you for your ongoing interest in how the city of Christchurch responds to the challenges of coastal hazards in the context of climate change.

Yours sincerely



Dr Karleen Edwards  
**CHIEF EXECUTIVE**