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Sent: Wednesday, 4 June 2025 12:57 pm
To: Sean Mallon <sean.mallon@kapiticoast.govt.nz>
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Subject: Fw: Flood modelling - response to 15/16 May email

Good Morning Sean,

First, I would like to thank you for sharing the concerns of the CRU and KCDC's official responses with our elected officials. I appreciate the transparency you have introduced into this process. In that same spirit, I have also included our elected officials in this email.

Your email dated 16 May seems to suggest that CRU is disseminating misinformation. While I find this disappointing, it is not entirely unexpected given the ongoing culture within the Council that often resorts to personal attacks against ratepayers.

The Council's efforts to engage with the community have, once again, turned into a mere formality, overshadowed by unfounded criticisms directed at us.

We continue to have serious concerns about the process and the flood hazard management report.

LiDAR Data

Now that the Council holds the updated 2025 LiDAR data, when will it be updated into the model?

No doubt this will impact "affected properties" that no longer show any portion of their section sitting within the extent of the flood modelling. Conversely, the new update may identify new "affected properties". How does the Council plan to include them in an engagement process (if at all)?

It is unclear why your team did not wait until they had the updated data and worked with those "affected properties" instead of using outdated data that contributed to undeniably incorrect maps.

When the Council disseminates inaccurate and outdated information, it has real-life consequences for people. In this instance, there are increased insurance costs and heightened stress levels in trying to prove the Council's findings are incorrect.

I am sure you know the Council's liability for placing unaffected properties on Council maps.

When the Council gets it wrong, we all pay.

District Planning

The various models used by AWA were derived using various technical assumptions. As a result, the decisions the consultants have made themselves (e.g., data sources) are unconstrained by KCDC's Statement of Work (SoW).

Moreover, the SoW encourages the use of SSPS 8.5.

Knowing that the final report would eventually be used to notify a flood hazard plan change, the SoW should have considered the likely effects of climate change (the statutory requirement for a plan change), not the unlikely effects.

Is there a date when the Council proposes to notify a flood hazard plan change for the Kapiti Coast?

LIMs

Is the Council intending to incorporate the final report results of flood hazards into LIMs based on stormwater modelling?

I'm asking because the Hamilton City Council was successfully blocked from trying to include this particular information on its LIMs.

The Flood Hazard Science

CRU's initial position on the science is that the AWA draft report is a vulnerability assessment of the stormwater system, not a flood hazard risk assessment.

In addition, there is no verification of the models' calibration and validation.

The main problem is the reliance on extreme climate scenarios with no consideration of plausibility and ignoring other factors that contribute to stormwater vulnerability (liquefaction, land movement, land use changes, urban intensification, changes in river bed and base level, etc)

Furthermore, the modelling assumes no stormwater system changes over the next 100 years.

Peer Review

Given our concerns, those of our "affected property" members, and the wider community, CRU successfully raised sufficient funds (once again) through grassroots fundraising to conduct an independent peer review of the AWA draft report.

I would be happy to provide a copy of the terms of reference.

We would appreciate it if AWA could postpone finalising their report until they have had a chance to read our peer review. We are also happy to discuss the review's findings with their technical team. The report should be finalised fairly soon.

Could you please confirm if this is a possibility?

I have attached a link to an article about flood map updates in Tauranga. Although it is not identical to the current situation in Kapiti, it provides an interesting insight into the subject of flood maps.

<https://www.nzherald.co.nz/bay-of-plenty-times/news/tauranga-flood-map-update-a-win-for-landowners-developers-after-court-case/I6WCTCPWXBASDMHOSHRKKNHULA/>

We remain open to your request to meet and advance this discussion once we understand the Council's stance on the matters addressed in this email.

Regards,

Salima