Our Ref: NZ0113017

Contact: Rhys Phillips

2 April 2013

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Proposed Kapiti Coast District Plan 2012
Kāpiti Coast District Council
Private Bag 60601
Paraparaumu 5254

Attention: Jim Ebenhoh, Sustainable Development Manager

& by email: submissions@kapiticoast.govt.nz

Dear Jim,

Form 5

Submission on Proposed Kapiti Coast District Plan 2012

1. Name of Submitter:

Kotuku Parks Ltd C/- Cardno (NZ) Ltd
PO Box 13 142
Johnsonville
Wellington 6440
Attn: Rhys Phillips

2. Submission on:

Proposed Kapiti Coast District Plan 2012

3. Submission Covers:

Chapter 4 - Coastal Environment

& related sections of Chapter 5 – Living Environment and Chapter 9 – Hazards.

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4. Submission Details:

Overview

Kotuku Parks Ltd (Kotuku) opposes the inclusion of Coastal Hazard Management Areas (CHMA's) in the Proposed Kapiti Coast District Plan 2012 (PDP) and seeks the removal of the CHMA and all associated objectives, policies, rules and standards until such time as a detailed assessment of the coastal processes and likely effects of sea level rise (SLR) on the position of the shoreline has been completed.

Alternatively we seek a re-examination of the positions of the 50 and 100 year projected "Otaihanga shorelines" at Kotuku Park, as there appears to be inconsistences between the calculated values and the plotted positions of these lines.

The CHMA's are based upon the Kapiti Coast Erosion Hazard Assessment 2012 Update by Dr Roger D Shand of Coastal Systems (the Shand Report). Cardno's Coastal and Ocean team have visited the site and undertaken a detailed review of Dr Shand's Report, including meeting with him to seek clarification regarding technical aspects of his work.

Cardno's *"Assessment of the Kapiti Coast Erosion Hazard Report 2008 and 2012 Update by Dr Roger Shand"* is attached in Appendix A. This report details several issues and limitations with the Shand report, many of which are acknowledged by Dr Shand himself in his report. It recommends that Dr Shand's report be used as a starting point for a detailed study of coastal processes for the entire Kapiti coast.

Cardno's report also notes significant issues with the position of the 50 and 100 year CHMA's adjacent to, and affecting Kotuku Parks land. Our assessment indicates that calculations used to assess the CHMA lines are overly conservative. They also indicate that the positions of the plotted CHMA's do not match Dr Shand's calculations. More detailed analysis of the position of the CHMA' lines affecting Kotuku needs to be undertaken before any restrictions are placed upon Kotuku's land.

Background:

Kotuku Parks Ltd has been developing a large area of land to the south of the Waikanae River mouth for many years. The last two stages of this development, Stages 4 and 7 (see 98265-PG01 attached at Appendix B) have been approved and constructed. The applicant is currently liaising with KCDC over the last few items before the s224C certificate is issued and titles are created.

As Cardno Plan 98265-PG-01 attached shows, the proposed 100 year managed and 100 year unmanaged CHMA's cross the western portion of Stages 4 and 7, affecting 11 of the approved residential lots.

5. The Shand Report 2012.

The *No build* CHMA and Relocatable Building CHMA's in the PDP are based upon the unmanaged 50 year and 100 year erosion predictions in the Shand Report.

As noted our review of the Shand Report attached at Appendix A, this submission should not be seen as a criticism of the studies and reports by Dr Shand, rather it is intended to highlight the challenges faced by Dr Shand when working with limited funds and information on what is clearly a complex coastal system. It is noted that Dr Shand has responsibly, and transparently, noted the limitations of the available information, the process understanding and the conservative nature of the assumptions that were necessary to undertake the project.

Appendix A

Assessment of the Kapiti Coast Erosion Hazard Reports 2008 and 2012 Update by Dr Roger Shand

Appendix B

Cardno Plan 98265 PG 01