

SENT 25/3/13



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Date Received	Submission Number

Resource Management Act 1991

Submission to:

Proposed Kāpiti Coast District Plan 2012

Submissions close Fri 1 March, 4pm (or Tues 2 April, 5pm for submissions on specified coastal provisions).

**Post:**  
 Kāpiti Coast District Council  
 Private Bag 60601  
 Paraparaumu 5254  
 Attention: Jim Ebenhoh, Sustainable Development Manager

**Deliver:**  
 Paraparaumu Service Centre, Unit 7, Kapiti Lights Complex  
 Paraparaumu  
 Waikanae Service Centre, Mahara Place, Waikanae  
 Ōtaki Service Centre, 81-83 Main Street, Ōtaki

**Email:**  
 submissions@kapiticoast.govt.nz

Please write contact details in clear BLOCK CAPITAL letters.

Is this an individual submission? (circle) Yes No

If this submission is from an organisation, please state the name of the organisation:

Title (circle) Mr Mrs Ms Miss Dr

First Name: JOHN Last Name: HARDING

House Number: 15 Street Name: HUNGERFORD ROAD

P O Box: Suburb: LYALL BAY

Town: WELLINGTON Post Code: 6022

Email: jharding@paradise.net.nz

Phone Day: 04 938 9498 Mobile Phone: 027 664 7134

Do you want to speak at the hearing in support of your submission? (circle) Yes No

If you circled yes then we will contact you about the timing of the hearings which will begin in mid 2013 following the submission process.

If others wish to make a similar submission would you be prepared to consider presenting a joint case? (circle) Yes No

Notes to person making submission:

Please note that all submissions (including names and contact details) will be made publicly available at council offices and public libraries. A summary of submissions including the name of the submitter may also be made publicly available and posted on the Kāpiti Coast District Council website. Personal information will also be used for administration relating to the subject matter of the submissions, including notifying submitters of subsequent steps and decisions. All information will be held by the Kāpiti Coast District Council, with submitters having the right to access and correct personal information.

If you are a person who could gain advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of part 1 of Schedule 1 of the Resource Management Act.

**I ~~could~~ / could not\* gain an advantage in trade competition through this submission.**

If you could gain an advantage in trade competition through this submission please complete the following:  
**I am/am not\*** directly affected by an effect of the subject matter of this submission that:  
 a) adversely affects the environment; and  
 b) does not relate to trade competition or the effects of trade competition.

\* please indicate by circling the word(s) in bold text that apply.



To the Kapiti Coast District Council

## **SUBMISSION ON PROPOSED KAPITI COAST DISTRICT COUNCIL CHAPTER 4 COASTAL HAZARD PROVISIONS**

We, John Richard and Elizabeth Elsie Harding, have owned the property at 21 Field Way, Waikanae Beach for some 20 years. It is our intention to sell the property to help fund our retirement. Last year we engaged Harcourts to sell our property and the auction was planned for 18 October 2012. The auction had to be cancelled when the “likely future shorelines” were placed on LIMs. We did not relish the thought of being the first guinea pig to test the amount of damage that Kapiti Coast District Council had inflicted on the beachfront property market.

In general terms we support the submission made by Christopher Ruthe on behalf of Coastal Ratepayers United.

In specific terms we oppose the coastal hazard lines and areas shown on the planning maps affecting our property and the associated restrictions contained in the Proposed District Plan (PDP).

### **Errors in Dr Shand’s analysis of Waimeha Inlet coastal hazard lines**

1. The 50 year managed and 50 year unmanaged lines are identical across the north side of the Waimeha inlet reserve, and our property.
2. This is not logical and is the only place in the Proposed District Plan where this occurs.
3. KCDC officers have not been able to provide a rational explanation for having identical lines across the reserve, and our property.
4. It is clearly an error because the Greater Wellington Regional Council (GWRC) has confirmed that they intend to continue with current Waimeha Stream Mouth management practices, and this management will make a difference.
5. KCDC’s coastal scientist Dr Shand has conceded verbally and in writing that his analysis of the Waimeha Stream mouth hazard lines is in error and should be reworked.
6. Dr Shand advised the writers of this submission to request the KCDC to instruct Coastal Systems Ltd to re-visit the Waimeha Inlet analysis.
7. Several significant errors of fact and analysis have been noted when reviewing Dr Shand’s 2008 Inlet report. His flawed report provides the basis for the Waimeha Inlet hazard lines. If the KCDC had consulted properly with residents prior to the rather rushed placement of lines on LIMs, it is very likely that these errors would have been picked up.

### **Lack of Independent Peer Review**

8. The errors are obvious and would have been picked up a competent peer reviewer. In respect of the Waimeha Inlet hazard lines it is clear that the peer review was not thorough.
9. The Memo from Jim Dahm of Focus Resource Management Group to Emily Thomson dated 30<sup>th</sup> October 2012 states *“While the 2012 report is now available ..... some further refinement may be required following the planned peer review of Coastal Systems (2012) final data and reporting.”* The planned peer review referred to by Jim Dahm has not been commissioned.

10. Dr Shand's 2008 Inlet report would have benefited from a carefully briefed, expert and independent peer review. It appears that Jim Dahm and the KCDC are at cross purposes regarding this peer review because in spite of frequent requests by this submitter, the KCDC is clearly determined to avoid Dr Shand's reports being exposed to an independent peer review.

### **Erosion Hazard Mitigation to Protect Public Assets**

11. The Waimeha Inlet is man-made. It was created in the 1920's by the developer of the Waikanae Beach subdivision. Before then the Waimeha Stream ran south and joined the Waikanae River.
12. With "finger groynes" on each side of the stream, the mouth could be moved seawards as far as desired, according to KCDC's coastal engineer John Lumsden.
13. KCDC has not investigated this option in the 5 years since the hazard lines first appeared on Dr Shand's 2008 Inlet Report. It certainly should have, because some \$1.8M of Council assets (sewerage infrastructure and reserve land) will be lost to the sea in 45 years, according to the PDP hazard lines.
14. The estimated cost of strengthening the training wall to last for at least 50 years is less than \$100,000. This work may not be needed for 15 to 25 years from now.
15. In failing to investigate mitigation options relating to the Waimeha Inlet Reserve during the last 5 years KCDC has not fulfilled its obligations under S32 of the Resource Management Act.

### **Public Access to the Beach**

16. The PDP hazard lines show that public access to the beach at high tide will be lost within 45 years. The PDP is silent on this issue.
17. KCDC has failed to work constructively with the GWRC to investigate and agree on responsibilities for the future management of the Waimeha Inlet in the best interest of ratepayers.

### **Accretion Factor**

18. KCDC has added confusion to the coastal erosion issue by amending the description of the hazard lines on LIMs from where the shoreline is 'likely' to be to where the shoreline 'could' be. This suggests that the 'likely' lines should be moved seawards.
19. In his analysis of future shorelines for the Waimeha Inlet Dr Shand has not allowed for accretion, even though the coastline is accreting north of Paraparaumu.
20. In the Memo referred to in 8. above Jim Dahm states that *"...where there is a long term trend for shoreline accretion (eg north of Paraparaumu), this may reduce or even cancel out sea level rise effects"* and *"It could be argued, therefore that the Future Shorelines (Coastal Systems Ltd 2012) and Coastal Hazard Management Zones (Focus, 2011) may overstate the potential coastal hazard erosion hazard on the northern portion of the Kapiti Coast. This is a complex matter worthy of further ongoing consideration."*
21. KCDC has clearly elected to ignore this advice.

## Maintaining Access and Essential Services

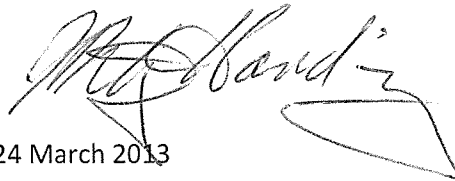
22. In respect of more vulnerable sections of the coastline, ie Raumati Beach and Paekakariki, key infrastructure assets such as road access, water supply, sewerage, power and telecommunications are predicted to be lost to the sea within 50 years. KCDC has known where the 50 year hazard lines would be placed since 2008. It could have started public consultation 5 years ago, but only now is it starting to develop and consult on a plan to manage the affected properties. This plan should have been included in the PDP.

## Dr Jeremy Gibb's Mitigation Proposals

23. Dr Jeremy Gibb in his 1978 Ministry of Works report Water & Soil Report Technical Report 10 provides an excellent high level analysis of the coastal processes involved, and discusses mitigation options. He recommended beach nourishment, and calculated the quantities of sand dredged from offshore needed to provide a dry beach of 10, 20, 30, 40, 50 metres *width* ~~depth~~ etc. He also recommended placing scree and quarried material in the sea at the south end of Paekakariki.
24. The writer of this submission has spoken to Jeremy Gibb on several occasions recently. Dr Gibb is of the view that the mitigation options he detailed in 1978 still have currency.
25. His theories certainly make sense to the writer. It seems that they have either been forgotten or they have been discredited. If they have been discredited there should be a decision making audit trail. Where is the analysis? And where is the Council resolution confirming that a full scale beach nourishment option has been investigated and discarded for good, documented reasons?
26. Given the huge loss in value suffered by Raumati and Paekakariki coastal property owners at the hands of the Dr Shand hazard lines, a full investigation of mitigation options by an experienced coastal engineer is warranted. The Council should seek proposals from New Zealand's leading consulting engineers to carry out this work. Dr Jeremy Gibb has indicated that he would be available to assist in an advisory role.
27. Without a proper investigation of the Gibb beach nourishment option, the S32 analysis is deficient. KCDC should be more transparent about its approach to this option.

We wish to be heard.

Signed by



Dated

24 March 2013

Address:

15 Hungerford Road

Lyall Bay

Wellington 6022