

Submission on notified proposal for plan change



About preparing a submission on a proposed plan change

You must use the prescribed form

- [Clause 6](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires submissions to be on the prescribed form.
- The prescribed form is set out in [Form 5](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 5. While you do not have to use this template, your submission must be in accordance with Form 5.

Your submission and contact details will be made publicly available

- In accordance with [clause 7](#) of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under [clause 8A](#) of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).
- [Section 352](#) of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.

Reasons why a submission may be struck out

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one 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.

To Kāpiti Coast District Council

Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021

Submitter details

Full name of submitter: Friends of Lake Karuwha

Contact person (name and designation, if applicable): Liz Francis, KCDC Contact for FoLK

Postal address (or alternative method of service under section 352 of the RMA):

Telephone: 027 234 8007

Electronic address for service of submitter (i.e. email): l.francis.nz@gmail.com

I would like my address for service to be my email *[select box if applicable]*



I have selected email as my address for service, and I would also like my postal address withheld from being publicly available *[select box if applicable]*



Scope of submission

The specific provisions of the proposed plan change that my submission relates to are:
[give details]

The north-east boundary of proposed Residential Intensification Precinct B (PRECx2) for the Ōtaki Centre as given in Proposed District Plan Change 2 Map 17, and as given in more detail in map IP.1 on Page 10 of the Section 32 Evaluation Report: Appendix E – Spatial Application of NPS-UD Intensification Policies (Boffa Miskell, 2022)

See Attachments 1 and 2.

Continue on a separate sheet if necessary

Submission

My submission is: *[include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]*

OPPOSITION

We strongly oppose the current north-east boundary of proposed Residential Intensification Precinct B (PRECx2) for the Ōtaki Centre as given in Proposed District Plan Change 2 Map 17 — see Attachment 1 — and as given in more detail on Page 10 of the Section 32 Evaluation Report: Appendix E – Spatial Application of NPS-UD Intensification Policies (Boffa Miskell, 2022) — see Attachment 2.

The annotation on Appendix E states that “Area extended around the south-western edge of Tamihana Street, to ensure a rational boundary to the north-eastern extent of the Town Centre Zone intensification area.”

We submit that this is far from rational.

AMENDMENT

We propose that the plan be amended so that the north-east boundary of PRECx2 follow the actual 400 m walkable catchment in that area, and in effect be aligned with the southwest boundary of the current PREC13 Ōtaki Low Density Housing Precinct (proposed to be deleted as part of this Plan Change). See Attachment 3. This would remove properties at 4, 6, 8, 10, 12, 14, 16, 18 and 20 Tamihana Street from Residential Intensification Precinct B.

REASONS

1. The existing “Ōtaki Low Density Housing Precinct” is described in the current District Plan as “This precinct is a very low density residential area in the vicinity of Lupin Road in northern Ōtaki. The density of development is limited because of the location of the area on the urban edge and surface water management constraints” We recognise, but do not support, that as part of the proposal (as given in paragraph 4.1 of Proposed District Plan Change 2) this descriptive text and the designation as PREC13 will be deleted.

2. This area is otherwise known as the Lake Karuwha Estate. It is a coherent and supportive community, with a single access point by one street from the higher lying area around Lupin Road. The Estate covers a low lying area bordered on three sides by streams with a central small lake which aids drainage. Walkways and areas of bush are significant features, and are enjoyed not only by residents of the community but by those who come from further afield to enjoy the peaceful environment. Ōtaki has few accessible walking areas and paths around the Estate and the lake are regularly used by residents, including those from neighbouring streets, especially families with young children.

3. Our subdivision was created as an intentional community that the developer described as “a green oasis in Ōtaki”. This intention was embodied in building height restrictions, large sections, setbacks to accommodate the ponding hazard, low and open-style fencing, a diversity of building styles, and a variety of native plantings in a reserve now maintained by KCDC. People who bought here place great value on the natural environment and the social connections the subdivision encourages. Many residents have added to the extensive plantings, greatly increasing biodiversity and encouraging an increase in native birdlife.

4. Residents support the sense of community for everyone here, through shared pest control measures, stream care, regular meetings and the formation of a community group - the “Friends of Lake Karuwha” - which has been recognised by KCDC as representing the interest of this community, and with which an MOU was signed in September 2018. (See <https://friendsoflakekaruwha.files.wordpress.com/2018/11/signed-mou-with-kcdc-nov-2018.pdf>). This submission is being made on behalf of the Friends of Lake Karuwha, and is also explicitly supported by the residents listed in Attachment 5.

Continue on a separate sheet if necessary

5. The Appendix E annotation with regard to the northeast boundary of PREC_{x2}, adding nine properties from the southwest side of Tamihana Street to the Residential Intensification Precinct B, states that this will “ensure a rational boundary”. We submit that this is not rational, because:

(a) It means that a larger degree of intensification will apply to only one side (the southwest) of Tamihana Street when this is part of the coherent community referred to. Maintaining the integrity and coherence of the community is important.

It is bad enough that the proposed removal of the “Ōtaki Low Density Housing Precinct” will permit a greater degree of development for the subdivision as a whole, with up to 3 storey housing of up to 11 m height, but it beggars belief and is distressing and divisive that NINE of the properties in our community will be able to have an even higher level of intensification with up to 4 storeys and up to 14 m height.

(b) We note that under Step 3, part 3, of the Methodology referred to in Appendix E, “Where the walkable catchment covers a significant majority of an urban block, the intensification area would be expanded to cover the full extent of the block”. This recognises that it makes sense to treat coherent communities as a whole when implementing a policy. The council proposal is the reverse of that - the intensification area is being expanded to cover a small extent of a coherent block and community that patently isn’t even within the walkable catchment for 400 m anyway. The proposed intensification area should be reduced to the 400 m walkable catchment boundary, rather than being expanded to nibble off a small part of our community.

(c) None of the properties from 4 to 20 Tamihana Street are within 400 m walking distance of the edge of the Ōtaki Town Centre. Since pedestrian access is via the single access point off Lupin Road, the walking distance from the closest edge of the Town Centre (near 14 Matene Street) to Tamihana Street ranges from about 450 m (for 4 Tamihana Street) to as much as 650 m for the furthest point of the proposed zone (20 Tamihana Street) - much more than the 400 m of walkable distance that is meant to apply. See <https://goo.gl/maps/6JUuoUXLzRYBEA9y9> and Attachment 4.

(d) The intensification area is being proposed to include properties on Tamihana Street located to the east of Open Space corresponding to a stream. This is inconsistent with the Appendix E Methodology which states under Step 3, part 4 that: “... it may be appropriate to exclude properties that are otherwise located within a walkable catchment on the basis that there are only a small number of properties; and they are separated from the remainder of the intensification area by a feature such as a road, open space or river.” So the properties from 4 to 20 Tamihana Street are not only outside the walkable catchment anyway, but inappropriately “connected” to the intensification area to the west across that stream and Open Space.

I seek the following decision from the Kāpiti Coast District Council: *[give precise details]*

AMENDMENT

We propose that the plan be amended so that the north-east boundary of PREC_{x2} follow the actual 400 m walkable catchment in that area, and in effect be aligned with the southwest boundary of the current PREC13 Ōtaki Low Density Housing Precinct (which is proposed to be deleted as part of this Plan Change). See Attachment 3.

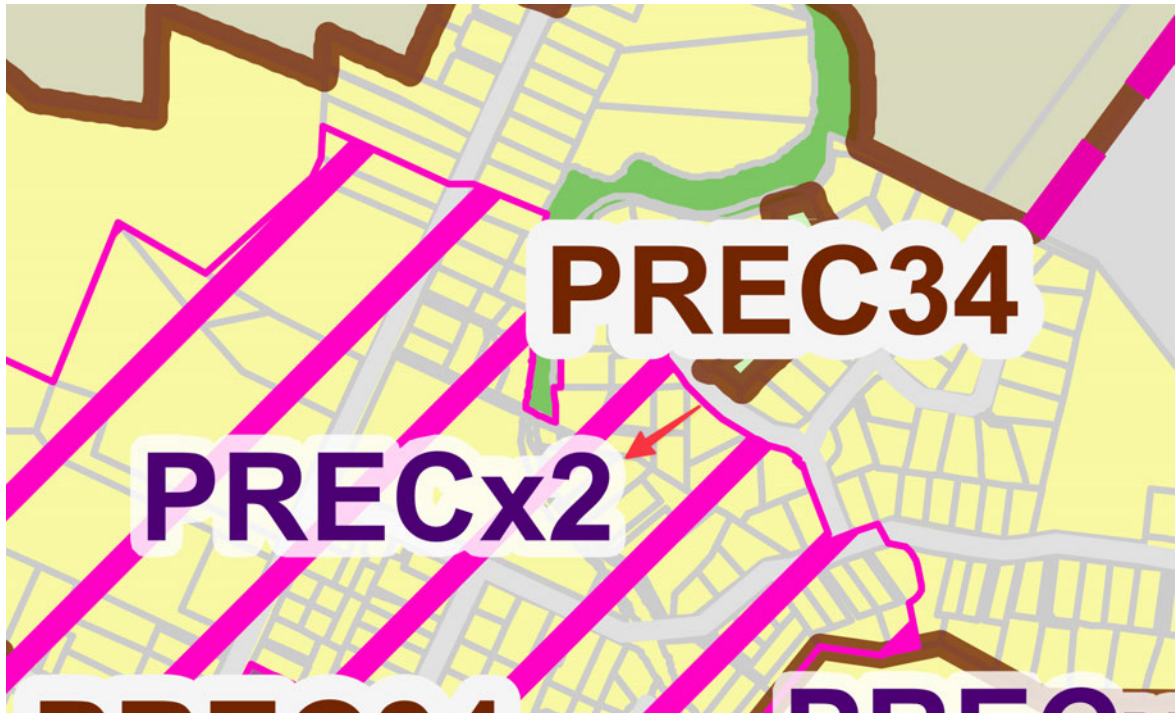
This would remove properties at 4, 6, 8, 10, 12, 14, 16, 18 and 20 Tamihana Street from the proposed PREC_{x2} Residential Intensification Precinct B around Ōtaki Centre.

Continue on a separate sheet if necessary

Attachment 1 – Proposed Boundary of Residential Intensification Precinct B (PRECx2) for the Ōtaki Centre

As given in Proposed District Plan Change 2 Map 17.

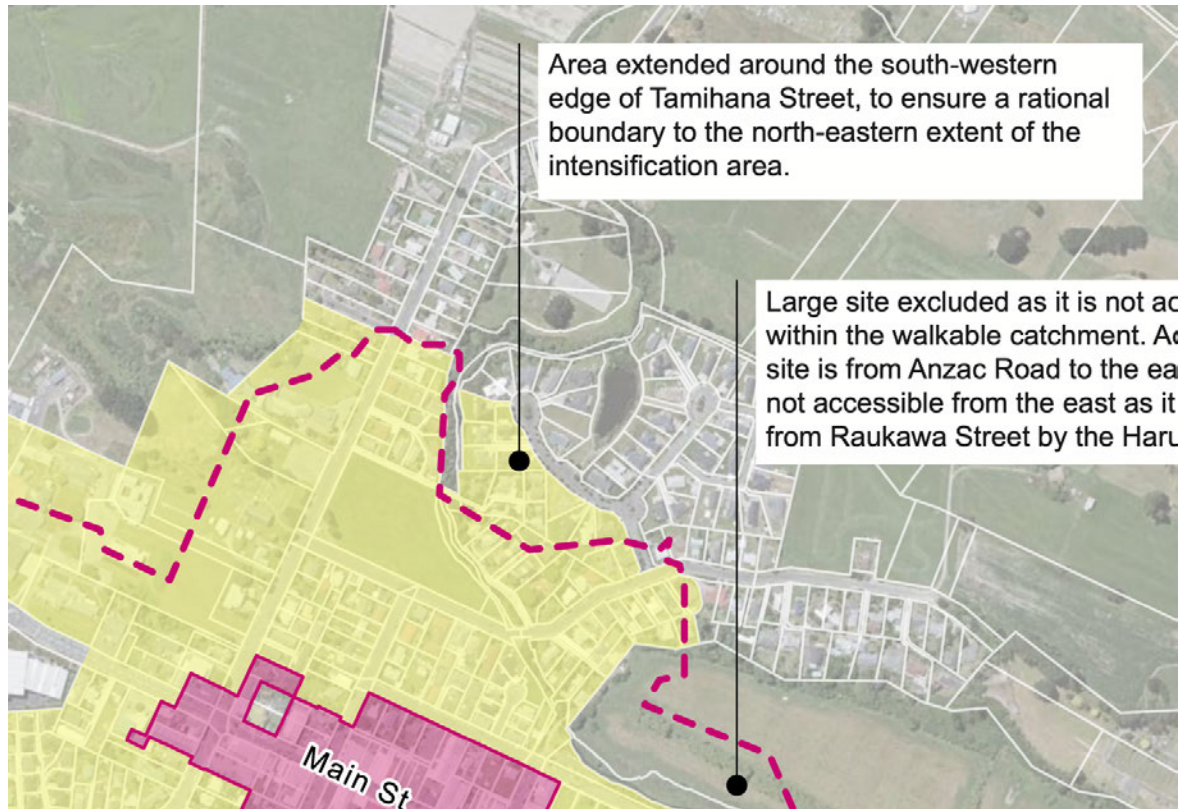
https://www.kapiticoast.govt.nz/media/33be5xmp/pc2_ipi.pdf



Attachment 2 – Detail of Proposed Boundary of Residential Intensification Precinct B (PRECx2) for the Ōtaki Centre

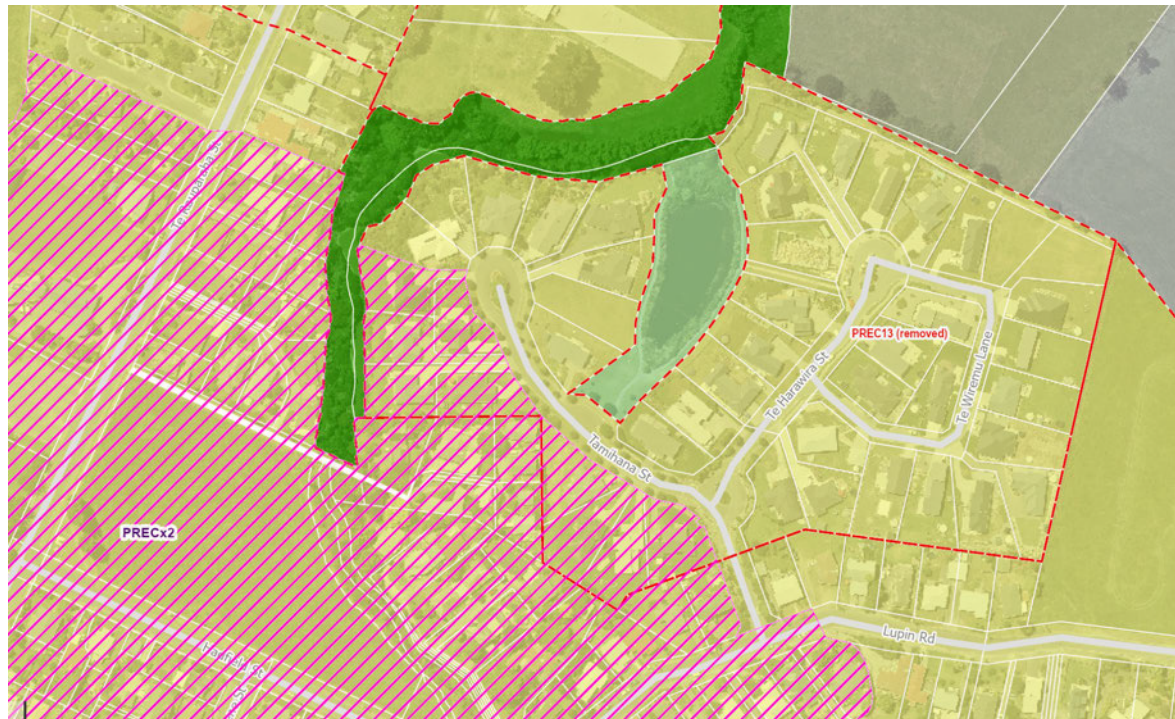
From map IP.1 on page 10 of Appendix E.

https://www.kapiticoast.govt.nz/media/wnic5k0t/pc2_s32_appendix_spatialapplicationpolicy3.pdf



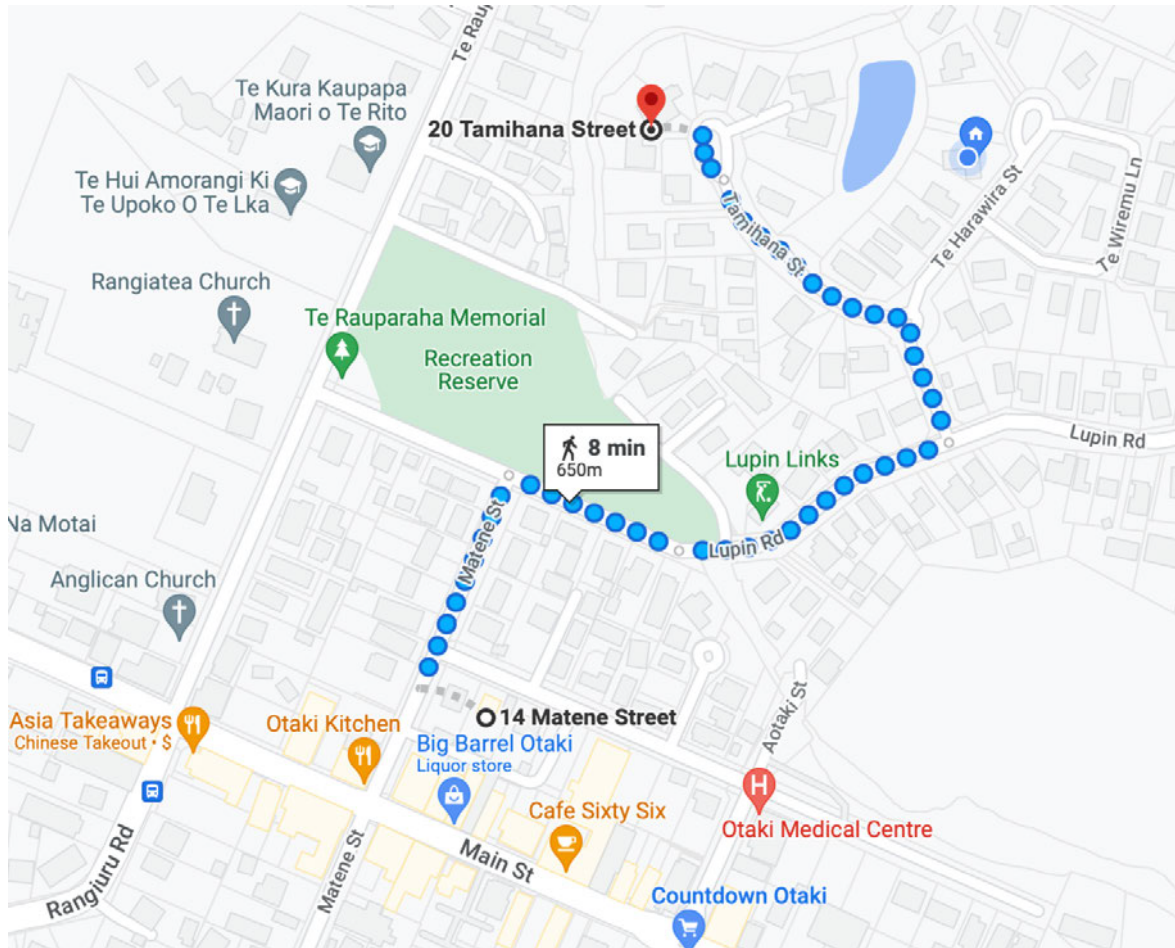
Attachment 3 – Proposed PREC_{x2} Boundary Compared with Boundary of current PREC₁₃ Ōtaki Low Density Housing Precinct

Screen capture from e-Plan <https://eplan.kapiticoast.govt.nz/eplan/#/Property/25935> zoomed out and including Layers for Proposed Plan Change 2 -> Residential Intensification Precinct B, and Precincts Removed.



Attachment 4 – Walking Distance from the Edge of Ōtaki Centre to Furthest Property within Proposed Residential Intensification Precinct B

From Google Maps Link <https://goo.gl/maps/6JU0oUXLzRYBEA9y9>, giving the walking distance from 14 Matene Street (approximately the closest edge of the Ōtaki Centre as given in Appendix E) to 20 Tamihana Street



Attachment 5 – List of Residents Explicitly Supporting This Submission

This submission is on behalf of the Friends of Lake Karuwha – a community group which is recognised by the Kapiti Coast District Council as representing the interests of our community.

In addition, the following residents wish to explicitly add their names in support of the submission.

Name	Address
Jo Lynch	4 Tamihana Street
David Blomfield	9 Tamihana Street
Jacqueline Blomfield	9 Tamihana Street
Michelle Ferreira	14 Tamihana Street
Alfred Cook	14 Tamihana Street
Hope Shackleton	16 Tamihana Street
David Shackleton	16 Tamihana Street
Kath Blewman	17 Tamihana Street
Liz Francis	18 Tamihana Street
Walter Carlson	21 Tamihana Street
Lyn Carlson	21 Tamihana Street
Joy Anderton	22 Tamihana Street
Jill Abigail	22 Tamihana Street
Richard Mortlock	1 Te Wiremu Lane
Vicky Hunter	9 Te Wiremu Lane
Robert Jordan	3 Te Harawira Street
Kathryn Perham	3 Te Harawira Street
Anne Thorpe	4 Te Harawira Street
Ailsa Signal	8 Te Harawira Street
Peter Signal	8 Te Harawira Street
Neil Gordon	10 Te Harawira Street
Jenny Gordon	10 Te Harawira Street
Dianne Buchan	12 Te Harawira Street
Catherine Stirling	20 Te Harawira Street

Hearing Submissions [select appropriate box]

I wish to be heard in support of my submission.	<input checked="checked" type="checkbox"/>
I do not wish to be heard in support of my submission.	<input type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input type="checkbox"/>
If others make a similar submission, I will not consider presenting a joint case with them at a hearing.	<input type="checkbox"/>

15 September 2022

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

A signature is not required if you make your submission by electronic means.

Trade Competition [select the appropriate wording]

If you are a person who could gain an 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 1991.

I could ☐ / I 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 ☐ / I am not ☐ directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Email your submission to district.planning@kapiticoast.govt.nz or post/deliver to:

Attn: District Planning Team
Kāpiti Coast District Council
175 Rimu Road
Paraparaumu 5032

For office use only

Submission No:
85

☐

From: [Neil&Jenny Gordon](#)
To: [Mailbox - District Planning](#)
Cc: [Liz Francis](#)
Subject: Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021 : Friends of Lake Karuwha
Date: Thursday, 15 September 2022 10:33:38 am
Attachments: [proposed-plan-change-2-submission-form-form-5-FriendsOfLakeKaruwha-final-print.pdf](#)

Dear KCDC District Planning Team:

On behalf of the Friends of Lake Karuwha, and of our formal contact with KCDC (Liz Francis), please find attached a submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021.

As this is being electronically submitted we understand a signature on the form is not required.

Please can you formally acknowledge receipt.

Thank you.

Regards Neil Gordon