

KCDC _ Chapter 4 Coastal Environment

To:	Frances Lojkine	Date:	Friday 11th Nov 2016
Company:	Kapiti Coast District Council	Project:	Kapiti Coast District Plan Review
From:	Lisa Rimmer	Job No:	3367

LANDSCAPE ADVICE

Isthmus landscape architect consultants Brad Coombs and Lisa Rimmer have been asked to provide advice to the Council Officers Right of Reply and submissions requesting that the following be removed from areas of high natural character (HNC).

1. Areas with existing seawalls or other coastal hazard mitigation measures

Comment

Areas of HNC were identified and mapped in a district wide assessment using a methodology that is consistent with the operative RPS Policy 3 and the NZCPS Policy 13. Policy 3 requires that '*...there are no apparent buildings, structures and infrastructure*' in HNC areas. The intention of the policy is to distinguish HNC areas where natural elements patterns and processes dominate. In best practice assessment, and as clarified through practice note and case law guidance, this does not mean there will be no buildings, structures or infrastructure within an area of HNC. The test to be applied is whether or not the nature and extent of buildings, structures and infrastructure dominate and therefore become 'apparent'. This test is also relevant to areas of outstanding natural character. For example, in the Waikanae River mouth outstanding natural character (ONC) area, where there are board-walks, signage and timber bollards that are insufficient in nature and extent to detract from the overall natural character values.

In line with these policies and best practice assessment methods, highly modified areas of the coastal environment were not identified as areas of HNC. This has meant that seawalls were excluded, where they could be distinguished in a district wide mapping process. For example, along the Raumati Beach coastline, HNC areas are identified to the seaward side of existing seawalls where the beach is slightly modified. Small scale structures associated with seawalls, for example, groynes extending out across part of the beach, are of a nature and extent insufficient to detract from overall natural character values and are unlikely to be distinguished in a District wide assessment. 'Other' coastal hazard mitigation measures (such as planting to stabilise dunes or periodic gravel extraction to clear stream mouths) are also unlikely to 'tip the balance' and discount an area from being identified as having high natural character. The judgement to be made is that, overall, natural elements, patterns and processes are far more dominant - apparent.

In summary, there is an overall judgement to be made in the identification of areas of HNC; where natural elements, patterns and processes dominate. Existing seawalls, identified at the

scale of a district wide assessment, are excluded from areas of HNC, however, other smaller scale structures and coastal hazard mitigation measures do not sufficiently detract, or automatically exclude an area from having high natural character values.

2. Areas from which buildings, structures or infrastructure are apparent, including seaward of all Living Zones and commercial areas.

Comment

Policy 3 of RPS requires that there are no apparent buildings, structures or infrastructure in an area of HNC. The submission requests that the assessment also considers adjacent areas; that the surrounding environment should also be relatively unmodified with no apparent structures, buildings or infrastructure. This would discount most of the areas of HNC in the District. For example, where an area of HNC is identified at the Otaki River mouth and there are apparent buildings, structures and infrastructure in the Otaki Beach settlement alongside it. It is difficult to see how this would assist natural character management in the District and, in our view, the submission is inconsistent with the intention of RPS Policy 3.

3. River and stream mouths from which buildings, structures or infrastructure are apparent, including the mouth of the Mangaone Stream.

Comment

Similarly, in our view, this submission requests a further level of assessment to consider surrounding areas, which is inconsistent with the RPS Policy 3.

Recommendation

HNC areas are identified in the District Planning maps as recommended in Isthmus' Landscape and Coastal Environment Addendum Report, as appended to the Coastal Environment s42A report.

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Isthmus Group Ltd