

Proposed District Plan 2012

MEMORANDUM OF COASTAL RATEPAYERS UNITED INC. (CRU)

Re: Resumption of Reconvened Chapter 4 – Coastal Environment

No doubt the following questions have occurred to the Panel, but we offer our own wording suggestions in the hope that they may be of assistance to the Panel in its interaction with the experts and s42A report author.

Question 1 is to ensure that this major point is clear beyond doubt, and could be addressed to the experts as a group:

1. *Is it your expert opinion that the map in the section 42A report does not show the coastal environment as defined by NZCPS and RPS?*

Assuming that this is answered in the affirmative, there could be a follow-up question to the experts:

2. *Each place in the District either does or does not meet the criteria in NZCPS and RPS, and either is or is not in the coastal environment. Every applicant for a consent, and the KCDC staff who must deal with these applications, will have to determine this in order to decide which policies apply. Why do you consider in your response to (c) and (d)(i) that it is not best practice to give the certainty that would come from simply mapping these areas?*

There could also be a follow-up question to the author of the s42A report:

3. *Did any submitter request the investigation and inclusion of a mapped 'dominant coastal environment' line in their submission; if so, which submitter?*

We believe that the answers will raise questions with respect to both the scope for and the adequacy of the "dominant coastal environment" line being introduced as a mapped feature and part of the definition of the coastal environment. In response to submissions, an alternative coastal environment line was investigated and proposed. Of course there can be no scope objection to doing that - as long as the alterations to the map reflected the coastal environment more accurately in accordance with NZCPS and RPS. However, the experts appear to have agreed that this map does not in fact show the coastal environment.

We see the concept arising from the expert conference as an unhelpful "hybrid". A mapped line that omits the vast majority of the coastal environment in the District provides no certainty to users of the Plan, and indeed may be actively misleading to users. The experts agreed that "a line is useful to provide certainty, where it is possible", but offered no explanation as to why it is not possible to provide such certainty in Kapiti. The intent and direction of the PDP as notified was to provide that certainty for all users of the PDP.

A map of the coastal environment simply shows definitively which places meet the NZCPS/RPS criteria and which do not. A map which does not show this is of no practical use and should not form part of the Plan. Having agreed that the section 42A map does not show the coastal environment, the experts appeared reluctant to recommend that it be simply discarded; instead, they created a new and un-asked for role for it. The PDP is already complex enough without adding a new concept and map which can have no practical benefit to users. A useful Plan would include a correctly drawn map of the coastal environment, or no map at all – certainly not a misleading one.

CRU's oral presentation to the Panel expressed a concern that the s42A coastal environment map did not identify the coastal environment as it purported to do. We are gratified that the experts reached the same conclusion.

A handwritten signature in black ink, appearing to read 'P. Dunmore', written in a cursive style.

Paul Dunmore
Chairman, Coastal Ratepayers United Inc

19 September 2016