
PROPOSED KAPITI COAST DISTRICT PLAN 2012

s42A Report: Part B – CHAPTER 4 COASTAL ENVIRONMENT



Executive Summary:

1. This report considers submissions received by Kapiti Coast District Council (the Council) in relation to the relevant policies, rules and maps as they apply to Chapter 4 Coastal Environment.
2. The report outlines recommendations in response to the key issues that have emerged from these submissions.
3. There were a large number of submissions and further submissions received on Chapter 4 Coastal Environment. Submissions sought a range of outcomes; including, for example, support for Chapter 4 provisions, a wide range of suggested amendments to policies contained in Chapter 4, and requests for the entire chapter to be deleted. Chapter 4 is also subject to a number of consequential amendments arising from submissions to the whole of the Proposed District Plan (PDP) and other chapters.
4. Some changes to the PDP provisions are recommended to address matters raised in submissions and are summarised below:
 - Integration of the Coastal Environment provisions into Chapter 3 Natural Environment to recognise that, as the provisions of Chapter 4 Coastal Environment now largely relate to natural character, it is more appropriate for the provisions to be considered together;
 - Revision of the extent of the coastal environment to confine it to closer to the coast, recognising the variety of factors that contribute to the extent of the coastal environment in any given location;
 - Inclusion of Kapiti Island and the Waikanae River mouth as areas of outstanding natural character, with attendant policies and rules;
 - Amendments to ensure the clarity and workability of Chapter 4 policies while ensuring their alignment with the relevant objectives in Chapter 2 (as well as higher order resource management documents and legislation).

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APPENDICES:

- Appendix 1: Kapiti Coast District Coastal Environment Study (October 2012)
- Appendix 2: Kapiti Coast District Council Proposed District Plan Stakeholder Engagement Version Coastal Environment Background Report (June 2015)
- Appendix 3: Kapiti Coast District Council Proposed District Plan Stakeholder Engagement Version Natural Character Background Report (June 2015)
- Appendix 4: Kapiti Coast District Council Proposed District Plan Landscape and Coastal Environment Addendum (June 2016)
- Appendix 5: Updated planning maps for coastal environment
- Appendix 6: Outstanding natural character assessment record sheets

Section 1: Introduction

1.1 Purpose

1. This report is prepared under the provisions of section 42A of the Resource Management Act 1991 (RMA).
2. This report has been prepared for the Kapiti Coast District Council in accordance with Section 42A of the RMA to consider all submissions and further submissions received following the public notification of the Proposed District Plan (PDP) and to make recommendations on those submissions for the consideration of the PDP hearings panel.
3. This report addresses the introduction, all policies, explanations and rules of Chapter 4 Coastal Environment.
4. This report:
 - Outlines the statutory provisions relevant to the district plan review process
 - Discusses general issues
 - Discusses both the original and further submissions received following notification of the PDP
 - Makes recommendations as to whether or not those submissions should be accepted or rejected; and
 - Concludes with a recommendation for changes to the PDP provisions or maps based on the preceding discussion in the report.
5. Some changes are recommended to the provisions as notified and these are contained in Section 4 of this report. A summary of all recommendations on submissions and further submissions is contained in Section 5 of this report.
6. This report is intended to be read in conjunction with Section 42A Report: Part A – Background and Process which contains factual background information, statutory context and administrative matters pertaining to the district plan review and PDP. Section 42A Report: Part A is common to all chapters of the PDP whereas Part B is specific to each chapter or topic and addresses the submissions and further submissions relevant to that particular aspect of the PDP.

1.2 Author

7. My name is Frances Lojkine. I hold the following qualifications: Bachelor of Science (Microbiology), Postgraduate Diploma in Environmental Science, and Masters in Regional and Resource Planning. I have 20 years' experience in planning, including at central government, regional councils and territorial authorities. I am employed by MWH New Zealand Limited and have been since 2004.
8. My role in preparing this report is that of an expert policy planner.

9. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court December 2014. I have complied with that Code when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
10. The scope of my evidence relates to: Chapter 4 Coastal Environment I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
11. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.
12. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.
13. The literature or other material which I have used or relied upon in support of my opinions are as follows:
 - The Resource Management Act 1991;
 - The New Zealand Coastal Policy Statement 2010 (and the attendant National Implementation Plan 2011);
 - The (proposed and operative) Wellington Regional Policy Statement;
 - The Submitter Engagement Version of the PDP.
14. In evaluating the information and making recommendations on submissions, I have relied on input from Lisa Rimmer and Brad Coombes of Isthmus Group Limited and Te Ohu Taiao. The technical reports prepared by Isthmus Group Limited in the matter of the extent of the coastal environment, areas of outstanding natural character and areas of high natural character are appended to this report in Appendices 1 - 4.

1.3 Content of the Officer's Report

15. The purpose of this report is to bring to the attention of the Commissioners the relevant information and issues regarding Chapter 4 Coastal Environment, along with recommendations on the submissions and further submissions.
16. As submitters are entitled to speak and present evidence at the hearing, the recommendations contained within this report are preliminary only, relating only to the written submissions and any information accompanying that submission.
17. I emphasise that the conclusions and recommendations made in this report are my own, based on the information to hand at the time of writing this report, and are not binding upon the Commissioners. It should not therefore be assumed that the Commissioners will reach the same conclusion as myself having considered all the evidence brought before the hearing.

18. A large number of submissions and further submissions were received on Chapter 4 Coastal Environment. Submissions received sought a range of outcomes, from deleting the entire chapter to more minor wording changes to clarify policies.
19. This report is structured as follows:
Section 1: Introduction
Section 2: Statutory Considerations
Section 3: Consideration of Submissions and Further Submissions
Section 4: Recommended Amendments to Chapter 4
Section 5: Recommendations to Submissions and Further Submissions
20. Appendices attached to this report include:
Appendix One: Kapiti Coast District Coastal Environment Study (October 2012)
Appendix Two: Kapiti Coast District Council Proposed District Plan Stakeholder Engagement Version Coastal Environment Background Report (June 2015)
Appendix Three: Kapiti Coast District Council Proposed District Plan Stakeholder Engagement Version Natural Character Background Report (June 2015)
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Appendix Five: Updated planning maps for coastal environment
Appendix Six: Outstanding natural character assessment record sheets

1.4 Key Issues in Contention

21. Without derogating from the details contained in the submissions, which are addressed throughout this report, I consider the following to be the key issues in contention in the chapter:
- General coastal issues
 - Identification of the extent of the coastal environment
 - Areas of outstanding natural character
 - Identification and protection of natural character
 - Restoration of natural character
 - Public access
 - Natural dune management
 - Stream and river maintenance
 - Protecting private property rights
22. This Section 42A report is structured around each of the key issues.

Section 2: Statutory Considerations

23. There are a number of key statutory documents which must be noted as part of considering the PDP. These statutory documents are discussed more thoroughly in Section 42A Report: Part A – Background and Process, however there are some statutory considerations specific to Chapter 4 Coastal Environment which I discuss below.

2.1 Resource Management Act 1991

24. Section 31 of the RMA outlines the Council's functions. Subsection 1(a) sets out the requirement for objectives, policies and methods to be established, implemented and review to achieve the integrated management of effects of the use, development or protection of land and associated natural and physical resources of the District.
25. The purpose of the RMA is to promote the sustainable management of natural and physical resources. Part of sustainable development is enabling people and communities to provide for their social, economic and cultural wellbeing. The coastal environment operates as an overlay and underlying zoning contained in other chapters of the PDP will also apply to activities in the coastal environment. It is generally through these other chapters of the PDP that the enabling activities are provided for, with the coastal environment policies and rules being largely concerned with natural character.
26. Section 6(a) of the RMA requires the Council to recognise and provide for the preservation of the natural character of the coastal environment and the protection of them from inappropriate subdivision, use and development as a matter of national importance. Section 6(d) of the RMA requires the Council to recognise and provide for the maintenance and enhancement of public access to and along the coastal marine area as a matter of national importance.
27. Other matters listed in section 7 of the RMA are also relevant to Chapter 4 coastal environment, including maintenance and enhancement of amenity values and the quality of the environment.

2.2 New Zealand Coastal Policy Statement (NZCPS)

28. Section 75(3)(b) of the RMA requires the district plan to give effect to the NZCPS. The purpose of the NZCPS is to state policies in order to achieve the purpose of the RMA in relation to the coastal environment. The NZCPS is therefore of critical importance for Chapter 4 Coastal Environment of the PDP.
29. The NZCPS sets out a number of objectives and policies that are relevant to Chapter 4 Coastal Environment. These include:
- Objective 1
To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:

- *maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature;*
 - *protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and*
 - *maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity.*
- **Objective 2**
To preserve the natural character of the coastal environment and protect natural features and landscape values through:
 - *recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution;*
 - *identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and*
 - *encouraging restoration of the coastal environment.*
- **Objective 4**
To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by:
 - *recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy;*
 - *maintaining and enhancing public walking access to and along the coastal marine area without charge, and where there are exceptional reasons that mean this is not practicable providing alternative linking access close to the coastal marine area; and*
 - *recognising the potential for coastal processes, including those likely to be affected by climate change, to restrict access to the coastal environment and the need to ensure that public access is maintained even when the coastal marine area advances inland.*
- **Objective 6**
To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:
 - *the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits;*
 - *some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities;*

- *functionally some uses and developments can only be located on the coast or in the coastal marine area;*
 - *the coastal environment contains renewable energy resources of significant value;*
 - *the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities;*
 - *the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land;*
 - *the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and*
 - *historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.*
- **Policy 1**
Extent and characteristics of the coastal environment
 1. *Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities.*
 2. *Recognise that the coastal environment includes:*
 - a. *the coastal marine area;*
 - b. *islands within the coastal marine area;*
 - c. *areas where coastal processes, influences or qualities are significant, including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these;*
 - d. *areas at risk from coastal hazards;*
 - e. *coastal vegetation and the habitat of indigenous coastal species including migratory birds;*
 - f. *elements and features that contribute to the natural character, landscape, visual qualities or amenity values;*
 - g. *items of cultural and historic heritage in the coastal marine area or on the coast;*
 - h. *inter-related coastal marine and terrestrial systems, including the intertidal zone; and*
 - i. *physical resources and built facilities, including infrastructure, that have modified the coastal environment.*
- **Policy 4**
Integration
Provide for the integrated management of natural and physical resources in the coastal environment, and activities that affect the coastal environment. This requires:

- a. *co-ordinated management or control of activities within the coastal environment, and which could cross administrative boundaries, particularly:*
 - i. *the local authority boundary between the coastal marine area and land;*
 - ii. *local authority boundaries within the coastal environment, both within the coastal marine area and on land; and*
 - iii. *where hapū or iwi boundaries or rohe cross local authority boundaries;*
 - b. *working collaboratively with other bodies and agencies with responsibilities and functions relevant to resource management, such as where land or waters are held or managed for conservation purposes; and*
 - c. *particular consideration of situations where:*
 - i. *subdivision, use, or development and its effects above or below the line of mean high water springs will require, or is likely to result in, associated use or development that crosses the line of mean high water springs; or*
 - ii. *public use and enjoyment of public space in the coastal environment is affected, or is likely to be affected; or*
 - iii. *development or land management practices may be affected by physical changes to the coastal environment or potential inundation from coastal hazards, including as a result of climate change; or*
 - iv. *land use activities affect, or are likely to affect, water quality in the coastal environment and marine ecosystems through increasing sedimentation; or*
 - v. *significant adverse cumulative effects are occurring, or can be anticipated.*
- *Policy 6(b), (c), (e), (f), (h), (i)*
Activities in the coastal environment
 - 1. *In relation to the coastal environment:*
 - a. ...
 - b. *consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment;*
 - c. *encourage the consolidation of existing coastal settlements and urban areas where this will contribute to the avoidance or mitigation of sprawling or sporadic patterns of settlement and urban growth;*
 - d. ...
 - e. *consider where and how built development on land should be controlled so that it does not compromise activities of national or regional importance that have a functional need to locate and operate in the coastal marine area;*

- f. *consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable;*
- g. ...
- h. *consider how adverse visual impacts of development can be avoided in areas sensitive to such effects, such as headlands and prominent ridgelines, and as far as practicable and reasonable apply controls or conditions to avoid those effects;*
- i. *set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment; and*
- j. ...

- **Policy 7**

- Strategic Planning*

- 1. *In preparing regional policy statements, and plans:*

- a. *consider where, how and when to provide for future residential, rural residential, settlement, urban development and other activities in the coastal environment at a regional and district level; and*
 - b. *identify areas of the coastal environment where particular activities and forms of subdivision, use, and development:*
 - i. *are inappropriate; and*
 - ii. *may be inappropriate without the consideration of effects through a resource consent application, notice of requirement for designation or Schedule 1 of the Resource Management Act process; and provide protection from inappropriate subdivision, use, and development in these areas through objectives, policies and rules.*

- 2. *Identify in regional policy statements, and plans, coastal processes, resources or values that are under threat or at significant risk from adverse cumulative effects. Include provisions in plans to manage these effects. Where practicable, in plans, set thresholds (including zones, standards or targets), or specify acceptable limits to change, to assist in determining when activities causing adverse cumulative effects are to be avoided.*

- **Policy 13**

- Preservation of natural character*

- 1. *To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:*

- a. *avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and*

- b. *avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by:*
 - c. *assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and*
 - d. *ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.*
 - 2. *Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:*
 - a. *natural elements, processes and patterns;*
 - b. *biophysical, ecological, geological and geomorphological aspects;*
 - c. *natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;*
 - d. *the natural movement of water and sediment;*
 - e. *the natural darkness of the night sky;*
 - f. *places or areas that are wild or scenic;*
 - g. *a range of natural character from pristine to modified; and*
 - h. *experiential attributes, including the sounds and smell of the sea; and their context or setting.*
- **Policy 14**
Restoration of natural character
Promote restoration or rehabilitation of the natural character of the coastal environment, including by:
 - a. *identifying areas and opportunities for restoration or rehabilitation;*
 - b. *providing policies, rules and other methods directed at restoration or rehabilitation in regional policy statements, and plans;*
 - c. *where practicable, imposing or reviewing restoration or rehabilitation conditions on resource consents and designations, including for the continuation of activities; and recognising that where degraded areas of the coastal environment require restoration or rehabilitation, possible approaches include:*
 - i. *restoring indigenous habitats and ecosystems, using local genetic stock where practicable; or*
 - ii. *encouraging natural regeneration of indigenous species, recognising the need for effective weed and animal pest management; or*
 - iii. *creating or enhancing habitat for indigenous species; or*
 - iv. *rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarsh; or*
 - v. *restoring and protecting riparian and intertidal margins; or*
 - vi. *reducing or eliminating discharges of contaminants; or*
 - vii. *removing redundant structures and materials that have been assessed to have minimal heritage or amenity values and*

*when the removal is authorised by required permits, including an archaeological authority under the Historic Places Act 1993;
or*

viii. restoring cultural landscape features; or

*ix. redesign of structures that interfere with ecosystem processes;
or*

x. decommissioning or restoring historic landfill and other contaminated sites which are, or have the potential to, leach material into the coastal marine area.

- Policy 15

Natural Features and natural landscapes

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:

a. avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and

b. avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; including by:

c. identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to:

i. natural science factors, including geological, topographical, ecological and dynamic components;

ii. the presence of water including in seas, lakes, rivers and streams;

iii. legibility or expressiveness – how obviously the feature or landscape demonstrates its formative processes;

iv. aesthetic values including memorability and naturalness;

v. vegetation (native and exotic);

vi. transient values, including presence of wildlife or other values at certain times of the day or year;

vii. whether the values are shared and recognised;

viii. cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features;

ix. historical and heritage associations; and

x. wild or scenic values;

d. ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and

e. including the objectives, policies and rules required by (d) in plans.

- Policy 18

Public open space

Recognise the need for public open space within and adjacent to the coastal marine area, for public use and appreciation including active and passive recreation, and provide for such public open space, including by:

- a. ensuring that the location and treatment of public open space is compatible with the natural character, natural features and landscapes, and amenity values of the coastal environment;*
- b. taking account of future need for public open space within and adjacent to the coastal marine area, including in and close to cities, towns and other settlements;*
- c. maintaining and enhancing walking access linkages between public open space areas in the coastal environment;*
- d. considering the likely impact of coastal processes and climate change so as not to compromise the ability of future generations to have access to public open space; and*
- e. recognising the important role that esplanade reserves and strips can have in contributing to meeting public open space needs.*

- **Policy 19**

- *Walking access*

- 1. Recognise the public expectation of and need for walking access to and along the coast that is practical, free of charge and safe for pedestrian use.*
- 2. Maintain and enhance public walking access to, along and adjacent to the coastal marine area, including by:*
 - a. identifying how information on where the public have walking access will be made publicly available;*
 - b. avoiding, remedying or mitigating any loss of public walking access resulting from subdivision, use, or development; and*
 - c. identifying opportunities to enhance or restore public walking access, for example where:*
 - i. connections between existing public areas can be provided; or*
 - ii. improving access would promote outdoor recreation; or*
 - iii. physical access for people with disabilities is desirable; or*
 - iv. the long-term availability of public access is threatened by erosion or sea level rise; or*
 - v. access to areas or sites of historic or cultural significance is important; or*
 - vi. subdivision, use, or development of land adjacent to the coastal marine area has reduced public access, or has the potential to do so.*
- 3. Only impose a restriction on public walking access to, along or adjacent to the coastal marine area where such a restriction is necessary:*
 - a. to protect threatened indigenous species; or*
 - b. to protect dunes, estuaries and other sensitive natural areas or habitats; or*

- c. *to protect sites and activities of cultural value to Māori; or*
 - d. *to protect historic heritage; or*
 - e. *to protect public health or safety; or*
 - f. *to avoid or reduce conflict between public uses of the coastal marine area and its margins; or*
 - g. *for temporary activities or special events; or*
 - h. *for defence purposes in accordance with the Defence Act 1990; or*
 - i. *to ensure a level of security consistent with the purpose of a resource consent; or*
 - j. *in other exceptional circumstances sufficient to justify the restriction.*
4. *Before imposing any restriction under (3), consider and where practicable provide for alternative routes that are available to the public free of charge at all times.*

- Policy 20

- Vehicle access

- 1. *Control use of vehicles, apart from emergency vehicles, on beaches, foreshore, seabed and adjacent public land where:*
 - a. *damage to dune or other geological systems and processes; or*
 - b. *harm to ecological systems or to indigenous flora and fauna, for example marine mammal and bird habitats or breeding areas and shellfish beds; or*
 - c. *danger to other beach users; or*
 - d. *disturbance of the peaceful enjoyment of the beach environment; or*
 - e. *damage to historic heritage; or*
 - f. *damage to the habitats of fisheries resources of significance to customary, commercial or recreational users; or*
 - g. *damage to sites of significance to tangata whenua; might result.*
 - 2. *Identify the locations where vehicular access is required for boat launching, or as the only practicable means of access to private property or public facilities, or for the operation of existing commercial activities, and make appropriate provision for such access.*
 - 3. *Identify any areas where and times when recreational vehicular use on beaches, foreshore and seabed may be permitted, with or without restriction as to type of vehicle, without a likelihood of any of (1)(a) to (g) occurring.*

30. A series of policies in the NZCPS relate to natural hazards. These policies are not considered further in this section 42A report as the coastal hazard provisions of the District Plan remain in a review phase. The requirements of the NZCPS policies will be given effect to when new provisions are publicly notified.

31. The provisions of the NZCPS are fundamental to Chapter 4 Coastal Environment. However, as the coastal environment functions as an overlay in the PDP, other

chapters (such as Chapter 5 Living Environment and Chapter 8 Open Space) also have a role in ensuring that the PDP gives effect to the NZCPS. A holistic consideration of the relationship between the PDP and the NZCPS is therefore necessary. This section of the Chapter 4 Coastal Environment report focusses on the objectives and policies of the NZCPS that are relevant to natural character and public access.

32. The provisions in Chapter 4 Coastal Environment give effect to the NZCPS provisions as they relate to:
- Coastal processes (NZCPS Objective 1) – Policies 4.6, 4.7 and associated rules;
 - Natural character (NZCPS Objective 2 and Policies 1, 13, 14 and 15) – Policies 4.1 – 4.4, associated rules, identification of the extent of the coastal environment on the planning maps, and identification of areas of high natural character in the coastal environment; new policy, rules, maps and assessment record sheets to identify areas of outstanding natural character in the coastal environment and manage activities within these areas;
 - Public access (NZCPS Objective 4 and Policies 18 and 20) – Policy 4.5 and associated rules.
33. Objective 6 of the NZCPS relates to enabling people and communities to provide for their social, economic and cultural wellbeing and their health and safety through subdivision, use and development. It is supported by NZCPS Policies 4, 6 and 7. These matters have been the subject of significant comment from submitters. Following the withdrawal of the coastal hazard provisions in 2014, Chapter 4 Coastal Environment now contains relatively few restrictions on use of private property. Those restrictions that do remain relate primarily to activities within areas of high natural character, where the values identified are significant enough to warrant such restrictions. Provisions that enable activities in the coastal environment are contained in the underlying zones, and are the subject of the section 42A reports on those zones.

2.3 National Policy Statements

34. The PDP must give effect to any relevant national policy statement as directed by section 75(3)(c) of the Act. With the exception of the NZCPS as discussed above, there are no national policy statements that are relevant.

2.4 Regional Policy Statement

35. As at the date the PDP was notified, the Proposed Wellington Regional Policy Statement, 2009 was still the subject of appeals to the Environment Court. Accordingly, the PDP was required to give effect to the Operative Regional Policy Statement 1999 by Section 75(3)(c) of the RMA. The provisions of the Proposed Wellington Regional Policy were required to be given regard to by Section 74(2)(a)(i).

36. The Proposed Regional Policy Statement for the Wellington region was made operative on 24 April 2013. The PDP was notified before the Regional Policy Statement (RPS) was made operative and was therefore prepared on the basis of giving effect to the Operative RPS, with regard given to the Proposed RPS.
37. Any changes to the PDP recommended in this report are constrained to the scope provided by submissions. However where submissions enable PDP provisions to be aligned with the now Operative RPS, I have identified this opportunity in this report.
38. There are several objectives and policies in the Operative RPS that have specific relevance to Chapter 4 – these include:
- *Objective 4: The natural character of the coastal environment is protected from adverse effects of inappropriate subdivision, use and development.*
 - *Objective 5: Areas of the coastal environment where natural character has been degraded are restored and rehabilitated.*
 - *Objective 7: The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.*
 - *Objective 8: Public access to and along the coastal marine area, lakes and rivers is enhanced.*
 - *Policy 3: Protecting high natural character in the coastal environment – district and regional plans*
 - *Policy 4: Identifying the landward extent of the coastal environment – district plans*
39. I consider the policies and rules in Chapter 4 work to implement the objectives and policies of the Operative RPS. This includes provisions that contribute to the achievement of:
- preservation, restoration and rehabilitation of the natural character of the coastal environment (Policies 4.2, 4.3 and 4.4, rules and new policies and rules for areas of outstanding natural character);
 - management of the integrity, functioning and resilience of physical coastal processes (Policies 4.6 and 4.7);
 - maintenance of public access along the coastal marine area (Policy 4.5)

2.5 Other Relevant National Instruments

40. There are no other National Instruments of direct relevance to the issues addressed in this report.

2.6 National Environmental Standards

41. There are no National Environmental Standards of direct relevance to the issues addressed in this report.

Section 3: Consideration of Submissions and Further Submissions

3.1 Report Structure

42. Submitters and further submitters submitting on Chapter 4 Coastal Environment raised a number of issues which have been grouped into sub-topics within this report. These issues are addressed in the following sections of the report:

Table 1 - Overview of Submission Topics

Issue Topic	Report Section
General Coastal Issues	3.3
Identification of the coastal environment	3.4
Areas of outstanding natural character	3.5
Identification and protection of natural character	3.6
Restoration of natural character	3.7
Public access	3.9
Protection of natural dunes	3.8
Stream and river maintenance works at the coast	3.10
Protecting private property rights	3.11
Coastal yard requirements	3.12

43. The table in Section 5 should be used to locate the relevant sections where each submission is discussed. The submissions have been grouped into similar topics. Note that some submissions will be addressed under a number of topic headings based on the topics contained in the submission.
44. Section 3 discusses the issues raised in the submissions and further submissions, makes recommendations on whether those submissions / further submissions should be accepted or rejected, and gives reasons for such recommendations.
45. For efficiency and in accordance with Clause 10(3) of the First Schedule of the RMA, the following evaluation has been undertaken on both an issues and provisions-based approach, as opposed to a submission by submission approach. The evaluation has been organised in accordance with the chapters of the PDP as notified.
46. Due to the number of submission / further submission points, this discussion is generic only and may not contain specific recommendations on each submission point but instead discusses the issues. This approach is consistent with Clause 10(2)(a) of Schedule 1 to the RMA. Specific recommendations on each submission / further submission point are contained in Section 5.

47. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves. Where I concur with the relief sought and rationale for that relief, I have noted my agreement and provided my recommendation in the summary of submission table in Section 5. Where I have undertaken further evaluation of the relief sought in a submission(s), my evaluation and recommendations are set out in this section of the report.

3.2 Format for Consideration of Submissions

48. The consideration of submissions follows the following structure:
Section 3 of this Hearings Report considers the submissions and further submissions received. Each section comprises sub-sections entitled:
- Matters Raised by Submitters – summarises the issues raised in the submissions and further submissions and the relief sought
 - Assessment – consideration of the issues raised
 - Recommendations – this outlines my recommendations to accept, accept in part or reject each point of submission and further submissions.
 - Recommended Amendments – outlines my recommended amendments to the PDP text in response to the points of submission and further submissions.
49. Where I recommend changes in response to submissions, these are shown as:
- Text recommended to be added to the PDP is underlined.
 - Text recommended to be deleted from the PDP is ~~struckthrough~~.
50. A copy of Chapter 4 Coastal Environment as amended by my recommendations contained within this Hearings Report is included in Section 4 of this report.
51. It should be noted that there are amendments proposed in Section 4 of my report that are a consequence of amendments proposed in other Section 42A reports. These can relate to whole of plan issues (such as the deletion of explanations) or between chapters to ensure consistency between policies, rules and standards. I do not intend to repeat the decisions sought in these submissions (or the assessment of them) in my report.
52. Minor amendments as provided for under Clause 16(2) of Schedule 1 to the RMA are also proposed in the amended PDP text in Section 4 of my report where the amendment has minor effect or corrects minor errors.

3.3 General Coastal Environment Issues

3.3.1 Matters Raised by Submitters

53. A number of submitters are opposed to the whole of Chapter 4 Coastal Environment, and seek its deletion. A significant number of submitters have also commented on the consistency of the Chapter 4 provisions with the RMA and the NZCPS 2010.
54. Submitters also identified concerns with overlapping and complex provisions within the PDP and noted that they found it confusing and poorly drafted, with gaps, errors and inconsistencies.
55. A number of submitters have requested the inclusion of provisions to enable activities in the coastal environment. Submissions 451-S Joan Allin and Rob Crozier, 762-C Lydia Johnston and 769-C Denise Church and Michael Veneer seek that appropriate activities in the coastal environment are enabled. Submission 743-D Paul and Grace Dunmore seeks amendment to section 4.1 to reflect an explicit distinction between the nature of the urban and rural coastal environments and to recognise that existing built assets (private and public) are an important part of the character and amenity of the urban coastal environment. Submission 675-G John Mills has requested a new permitted activity be included to allow for new structures.

3.3.2 Assessment

56. Recognising and providing for the preservation of the natural character of the coastal environment is a matter of national importance under section 6(a) of the RMA. The Council is also required to give effect to the NZCPS 2010 through its District Plan. Deleting Chapter 4 Coastal Environment would therefore not be consistent with legislative requirements.
57. I have reviewed Chapter 4 Coastal Environment against the requirements of the RMA and the NZCPS 2010 as I have prepared this section 42A report. In response to submissions as outlined in the sections of this report that follow I have recommended some amendments to policies and rules that I consider will achieve a greater level of consistency with the RMA and the NZCPS 2010.
58. In section 3.4.11 of the General/Plan Wide Part B section 42A report, the matter of overlapping and complex provisions and the drafting of the plan provisions was addressed from a 'whole plan' point of view. Consistent with the recommendations in that report, and in response to submissions on specific provisions, in the sections of this report that follow I have recommended a series of changes to the policies and rules of Chapter 4 Coastal Environment to address these matters, where I consider that changes are warranted.
59. With the withdrawal of the coastal hazard provisions in 2014 the policies and rules in Chapter 4 Coastal Environment now relate primarily to the management of activities within areas of high natural character. The changes recommended to the extent of

the coastal environment that were forecast in the Submitter Engagement Version of the PDP also mean that the area classified as coastal environment (and therefore covered by Chapter 4) would be significantly reduced. In the sections of this section 42A report that follow, I have recommended some further amendments to the provisions to recognise that some minor activities are appropriate within areas of high natural character, and to clarify that, outside these areas, the underlying zone rules apply. I note that the District Plan needs to be read as a whole. Policies and rules in other chapters of the District Plan do enable activities, and as the underlying zone rules apply to the coastal environment, and are only overlain by additional policies and rules in areas of high natural character, I consider that the approach to enabling activities is appropriate.

3.3.3 Recommendations

60. I recommend that submissions seeking the deletion of Chapter 4 Coastal Environment be **rejected**.
61. I recommend that submissions identifying concerns with overlapping and complex provisions within the PDP by **accepted in part** by making amendments to Chapter 4 Coastal Environment as outlined in sections 3.4 – 3.11 of this section 42A report.
62. I recommend that submissions requesting the inclusion of provisions to enable activities in the coastal environment be **accepted in part**, by clarifying that the underlying zone provisions apply to the majority of the coastal environment.

3.3.4 Recommended Amendments

63. Recommended amendments to Chapter 4 Coastal Environment are outlined in sections 3.4 – 3.12 of this section 42A report.

3.4 Identification of the Coastal Environment

3.4.1 Matter Raised by Submitters

64. Submissions 485-A and 485-D Frank and Vicki Boffa seeks that the definition and delineation of the coastal environment, as expressed in the NZCPS and the RMA should be more confined and restrictive in planning and development terms, and that it should be defined as the immediate coastal edge or margin (Submission 485-A and 485-C).
65. Submissions 202-AAA to 202-DDD Department of Conservation support in part Policy 4.1, subject to minor amendments to give effect to the NZCPS 2010, including reference to physical resources and built facilities forming part of the coastal environment. The explanation of the approach to mapping the coastal environment is supported and the submission seeks that the explanation be retained as notified.

Further Submitter 29 Crozier Family Trust and Allin Family Trust supports Submissions 202-AAA and 202-CCC.

66. Submission 451 Rob Crozier and Joan Allin opposes Objective 2.4 and Policy 4.1 and seeks, given the size of the coastal environment, recognition that appropriate activities should be enabled. The submission also seeks that the PDP as a whole be consistent with the NZCPS 2010 (which would include Policy 1 of the NZCPS 2010 relating to the extent of the coastal environment).

3.4.2 Assessment

67. The extent of the coastal environment has been subject to considerable technical work to date. Isthmus Group Limited (Isthmus) was contracted to the Council to provide a professional assessment of the inland extent of the Kapiti Coast District's coastal environment and associated areas of high natural character under Part II of the RMA and under the NZCPS 2010, for incorporation into the notified version of the PDP in 2012. The results of this assessment were provided to the Council in the report *Kapiti Coast District Coastal Environment Study* in October 2012 (attached as Appendix 1).
68. The *Kapiti Coast District Coastal Environment Study* used the NZCPS 2010, the proposed RPS, Environment Court decisions, best practice guidance and field surveys to provide assistance with determining the landward extent of the coastal environment in the Kapiti Coast, which was then mapped and notified as part of the PDP. It was acknowledged as part of this work that input from submitters would be needed in relation to the extent of the mapped coastal environment.
69. Following receipt of submissions on the PDP (particularly those noted above) a review of recent case law, Department of Conservation NZCPS 2010 practice notes (published 2013), coastal environment studies carried out post 2012 and the operative RPS was carried out with a view to reconsidering and redefining the coastal environment line and to ensure consistency with the operative RPS, as requested in submissions. The findings from this review are outlined in the report *Kapiti Coast District Council Landscape and Coastal Environment Addendum* May 2016 (attached as Appendix 4).
70. A methodology for reconsidering and redefining the coastal environment line was then developed by Isthmus following a meeting with submitters and Council staff in November 2014. This methodology uses a contextual approach, combining the three options accepted as best practice in New Zealand. Desktop studies, mapping workshops, field checks and further discussions with submitters further refined the coastal environment line, to a point where a line as outlined in Appendix 5 to this report was determined as appropriate by the technical experts. This coastal environment line, and a background report to provide information on the process used for its identification (*Kapiti Coast District Council Coastal Environment Background Report*, attached as Appendix 2) was presented as part of the Stakeholder Engagement Version of the PDP in June 2015. The SEV version of the coastal environment line was then subject to ongoing discussions with the

Department of Conservation (Submitter 202) and Frank Boffa (Submitter 485) between June 2015 and the publication of the *Landscape and Coastal Environment Addendum* in May 2016.

71. I have reviewed all of the reports prepared by Isthmus and discussed the process with them and officers from the Kapiti Coast District Council. I concur that redefining the coastal environment line in the manner set out in the *Landscape and Coastal Environment Addendum* is appropriate, and therefore recommend changes to the PDP to give effect to this.
72. I note that Isthmus has recommended (at section 2.5.3 of the *Landscape and Coastal Environment Addendum*) that further District Plan provisions be included to provide a clear definition that the extent of the coastal environment has been determined based on a summative evaluation of the factors required by the NZCPS 2010 and the RPS. Isthmus has also recommended acknowledgement of the benefits of a finer grain of assessment in the consideration of resource consent applications to determine the localised extent of the coastal environment in any given situation – and therefore the consent conditions that might be appropriate for any particular activity. This is made clear in the introduction to the assessment record sheets for the areas of outstanding natural character.
73. In relation to amendments suggested to Policy 4.1 (Submissions 202-AAA to 202-DDD Department of Conservation), the PDP is required to give effect to both the NZCPS 2010 (in this case Policy 1) and the Operative RPS (in this case Policy 4). The matters listed in Policy 4.1 accord with those contained in Policy 4 of the Operative RPS and cover a number of matters listed in Policy 1 of the NZCPS 2010. Policy 1 of the NZCPS 2010 is less directive as it includes a list of elements that the coastal environment includes, rather than directing that the landward extent of the coastal environment is to be identified using specific criteria as Policy 4 of the Operative RPS does. I consider that Policy 4.1 as it is written gives effect to both the NZCPS 2010 and the Operative RPS, and reflects the technical work undertaken by Isthmus.

3.4.3 Recommendations

74. I recommend that Submissions 485-A and 485-D Frank and Vicki Boffa are **accepted**, by amending the landward extent of the coastal environment as outlined in Appendix 5
75. I recommend that Submissions 202-AAA to 202-DDD Department of Conservation be **rejected** as Policy 4.1 appropriately gives effect to Policy 1 of the NZCPS, and is consistent with Policy 4 of the Operative RPS.
76. I recommend that Submission 451 is **accepted in part**, by amending the landward extent of the coastal environment as outlined above.

3.5 Areas of Outstanding Natural Character

3.5.1 Matters Raised by Submitters

77. Submission 485 Frank and Vicki Boffa seeks that:
- Kapiti Island and its associated islands are classified as outstanding rather than high natural character (Submission 485-D);
 - The entire coastal margin, being the inter-tidal area up to and including the unmodified fore-dune and secondary dune landforms (incorporating the Otaki and Waikanae River mouths) that have not been developed for residential or commercial purposes, is classified as an Outstanding Natural Feature and Landscape;
 - Chapter 4 is amended to identify the seascape extending along the entire Kapiti District coast out to a distance of 12 nautical miles as an outstanding natural landscape/seascape feature (Submission 485-E).

3.5.2 Assessment

78. The PDP did not identify any areas of outstanding natural character in the coastal environment. Outstanding Natural Features and Landscapes have been identified in Chapter 3 of the PDP. Some of these fall within the coastal environment overlay, but these have been assessed as part of the consideration of Chapter 3.
79. As a result of Submission 485 and prehearing discussions on 25 November 2014 and 27 March 2015, Isthmus has assessed whether there are areas of outstanding natural character in the coastal environment. A methodology was developed by Isthmus to identify areas of outstanding natural character, as outlined in section 2.4.2 of the *Landscape and Coastal Environment Addendum* report. The recommendations from this methodology were that the following areas of outstanding natural character be identified and mapped:
- Waikanae River Mouth
 - Kapiti Island, excluding the high natural character areas identified at Motungarara Island (Fishermans Island) and Waiorua Bay.
80. The seascape out to a distance of 12 nautical miles does not come with the jurisdiction of the Kapiti Coast District Council, but is controlled by the Wellington Regional Council. Identifying this area as an area of outstanding natural character in the PDP is therefore not possible.
81. I have reviewed the Isthmus report and rely on its guidance in recommending that these two areas be identified as areas of outstanding natural character. I agree that identifying these areas will ensure that the PDP is consistent with the requirements of the NZCPS 2010. I recommend that the areas are included on the PDP maps as identified in Appendix 5 and that assessment record sheets are included for both areas in Schedule 4.2 of the PDP.
82. Isthmus has also recommended that District Plan provisions provide a clear definition and distinction between areas of outstanding natural character and areas of high

natural character, and that their management is distinguished in order to be consistent with Policy 13(1)(a) and (b) of the NZCPS 2010. In my opinion, additional policies and rules would be a consistent and consequential amendment to the PDP from the identification of areas of outstanding natural character as requested in Submission 485. I recommend that a new policy is included to outline how areas of outstanding natural character have been identified, which will form a companion policy to Policy 4.2.

83. In terms of distinguishing the management of areas of outstanding natural character and areas of high natural character, Policy 13 of the NZCPS 2010 provides the fundamental requirements. The PDP must give effect to the requirements of Policy 13, and the consideration of any resource consent applications must have regard to the requirements of Policy 13. Because areas of outstanding natural character in the coastal environment were not identified in the PDP, consequential to the decision to identify the Waikanae River Mouth and Kapiti Island as areas of outstanding natural character, it is necessary to include rules in relation to these areas. In order to give effect to Policy 13(1)(a) of the NZCPS 2010 I recommend that fully discretionary activity rules are included for subdivision, buildings and earthworks in these two areas. To support these rules I recommend a new policy to distinguish the different management requirements in these areas.

3.5.3 Recommendations

84. I recommend that Submission 485-D Frank and Vicki Boffa is **accepted in part**, by identifying the majority of Kapiti Island and its associated islands as an Area of Outstanding Natural Character.
85. I recommend that Submission 485-5 Frank and Vicki Boffa is **accepted in part**, by identifying the Waikanae River Mouth as an Area of Outstanding Natural Character.
86. I recommend that Submission 485-E Frank and Vicki Boffa is **rejected**.

3.5.4 Recommended Amendments

87. I recommend that the majority of Kapiti Island and its associated islands and the Waikanae River Mouth are identified on the PDP maps as areas of outstanding natural character as outlined in Appendix 5 and that assessment record sheets as outlined in Appendix 6 are included as a new Schedule 4.2 of the PDP.
88. I recommend that consequential amendments are made by the inclusion of the following policies and rules to provide a planning framework for areas of outstanding natural character in the coastal environment:

Policy 4.3 – Areas of outstanding natural character

Areas of outstanding natural character in the coastal environment are identified and mapped in the District Plan, using the criteria listed in Policy 4.2, but on the

Reference

Objectives

2.4

Policy 4.3 – Areas of outstanding natural character

Reference

basis that:

- a) **they are exceptional, pre-eminent and clearly superior to areas of high natural character identified under Policy 4.2; and**
- b) **they have a combination of elements, patterns and processes that are exceptional in their intactness, integrity and lack of built structures and other modifications compared to areas of high natural character identified under Policy 4.2.**

Policy 4.4 – Activities in the coastal environment, including in areas of outstanding natural character

Reference

Manage activities in the coastal environment to preserve natural character by:

Objectives

- a) **avoiding adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character;**
- b) **avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment.**

2.4

<u>Discretionary Activities</u>	<u>Assessment Criteria</u>	<u>Reference</u>
<u>Subdivision of land in the coastal environment which includes areas of outstanding natural character in District Plan Maps</u>	<ol style="list-style-type: none"> 1. <u>Consistency with the relevant Plan policies, including (but not limited to):</u> <ol style="list-style-type: none"> a) <u>Coastal Environment Policies 4.3, 4.4, 4.5, 4.6 and 4.7.</u> 2. <u>Effects of the subdivision on the values of the area of outstanding natural character identified in Schedule 4.2.</u> 	<u>Policies 4.3, 4.4, 4.5, 4.6 & 4.7</u>
<u>Buildings and earthworks on land in the coastal environment which has been identified as having outstanding natural character in District Plan Maps</u>	<ol style="list-style-type: none"> 1. <u>Consistency with the relevant Plan policies, including (but not limited to):</u> <ol style="list-style-type: none"> b) <u>Coastal Environment Policies 4.3, 4.4, 4.5, 4.6 and 4.7.</u> 2. <u>Effects of the activity on the values of the area of outstanding natural character identified in Schedule 4.2.</u> 	<u>Policies 4.3, 4.4, 4.5, 4.6 & 4.7</u>

3.6 Identification and Protection of Natural Character

3.6.1 Matters Raised by Submitters

89. Submission 451-L to 451-N seek the following amendments to the introduction of Chapter 4 Coastal Environment, the text in section 4.1 and Policies 4.2 – 4.3:
- Revise inappropriate terminology and provide accurate references, including to the NZCPS;

- Refer to 'natural character of the coastal environment' instead of 'natural character in'
 - Delete Policies 4.2 and 4.3 or amend them to clarify the relationship between 'natural coastal features' and 'significant natural coastal features and habitat', and to ensure that Policy 4.2 applies only to high natural character
 - Make a series of amendments to Policy 4.3 to make it clearer, more focused and less extreme in terms of restrictions on activities
90. Submitters 637-A Susan Baird, 638-A Patrick Murray and 641-A Barbara and Murray Scott all support Submitter 451 Rob Crozier and Joan Allin.
91. Submitter 762-A to 762-D and 762-G to 762-L Lydia Johnston makes the same points as Submitter 451 Rob Crozier and Joan Allin.
92. Further Submitters 128 Kotuku Park Limited supports Submissions 451-L to 451-N Rob Crozier and Joan Allin, while Further Submitter 241 Lowell Manning opposes those submission points. Further Submitter 200 Christopher Ruthe supports Submission 451-L Rob Crozier and Joan Allin.
93. Submission 202-EEE to 202-NNN Department of Conservation seeks a series of amendments to the wording of Policies 4.2 to 4.3 to ensure they recognise the direction provided by the NZCPS. Further submitters 200 Christopher Ruthe, 227 Coastal Ratepayers United Inc and 230 Heather Paul and Peter Jones oppose Submission 202-NNN in relation to Policy 4.3, and consider that the whole policy should be reworded.
94. Submission 191-41 and 191-42 Landlink Ltd seeks that the concept of 'natural character' in Policies 4.2 to 4.4 is clarified and that natural coastal processes, as referred to in Policy 4.6, are also included in these policies.
95. Other submitters, for example Submission 280-B Bryce Wilkinson are opposed to some or all of the policies relating to identification and protection of natural character. Submissions 441-A Greater Wellington Regional Council, 447-A Kapiti-Mana Forest and Bird and 568-A Ross Boyd support the policies.

3.6.2 Assessment

96. Submissions 451-L to 451-N raise a number of concerns about the drafting of the introduction to Chapter 4, the section describing the coastal environment, and Policies 4.2 and 4.3. For example, the submission considers that there is a poor linkage between Chapters 4 and 5 of the PDP, that terminology and statements in these sections are inappropriate or incorrect, and that there is inadequate consideration of enabling appropriate activities in the coastal environment.
97. I acknowledge the concerns raised in the submission and have recommended a series of amendments to the introductory sections of Chapter 4 to address them. While detailed responses are included in Section 5 of this report, in summary:

- All references to ‘development’ within these parts of Chapter 4 have been checked, and the term removed where it is not considered to be appropriate or to be used in the context of the definition in the PDP;
 - I have recommended changes to the text to ensure that references to sections of the RMA 1991 and policies contained in the NZCPS 2010 are accurate.
98. Submission 451-L requests that a definition of “Areas of high natural character” be included in the PDP. In my opinion, Policy 4.2 of the PDP outlines the criteria by which areas of high natural character are identified. As outlined in the *Landscape and Coastal Environment Addendum* report, all of these areas have now been mapped and confirmed in response to submissions. Amending Policy 4.2 to note that areas of high natural character are those identified on the planning maps would clarify Policy 4.2. As areas of high natural character are the only areas mentioned in Policy 4.2 as it was notified, I agree that reference to natural coastal features should be removed, as requested in Submission 451-M. These amendments will also address the concerns raised by Submission 191-41 Landlink Ltd.
99. Submission 451-N seeks the deletion or substantial rewording of Policy 4.3. I have recommended a series of changes to the policy to ensure that Policy 4.3 is consistent with the NZCPS 2010 and the Proposed RPS. As “significant natural coastal features and habitat” are not mapped in the PDP I consider that the reference to them should be removed from Policy 4.3. As Policy 13(1)(b) of the NZCPS 2010 requires that significant adverse effects on natural character are to be avoided, and all other adverse effects are to be avoided, remedied or mitigated, I consider that the restrictive approach of Policy 4.3 of the PDP is appropriate in most circumstances. Recognising that some uses of the coastal environment in these areas can be appropriate, I have recommended some amendments to Policy 4.3 to focus it more on inappropriate activities.
100. Submitter 202 Department of Conservation seeks a series of amendments to Policies 4.2 and 4.3 and their explanations to ensure consistency with the NZCPS 2010. In relation to Policy 4.2, Submissions 202-EEE and 202-FFF Department of Conservation support the policy, but request that reference to the NZCPS 2010 is added to the explanation, which I agree is appropriate. Changes that I have recommended to Policy 4.2 in response to other submissions do not affect its consistency with the NZCPS 2010.
101. In relation to Policy 4.3, Submissions 202-GGG to 202-NNN Department of Conservation seek amendments to the policy and its explanation to ensure that it reflects the direction of Policy 13 of the NZCPS 2010. Policy 13 requires the preservation of the natural character of the coastal environment, and its protection from inappropriate subdivision, use and development, including by plans identifying areas where preserving natural character requires objectives, policies and rules. Policy 13 of the NZCPS 2010 will continue to apply to any consideration of activities in the coastal environment that require resource consent. Following the work completed by Isthmus, I have recommended changes to the landward extent of the coastal environment, and the inclusion of areas of outstanding natural character and

areas of high natural character, and Policy 4.3 will provide guidance on how to manage effects on these areas. I consider that, with some amendments to the text of Policy 4.3, this approach is consistent with the requirements of Policy 13 of the NZCPS 2010. In terms of the natural character of the balance of the coastal environment, rules that require consent for activities in the underlying zoning (such as the Rural Environment) will require assessment against Policy 13 of the NZCPS 2010 when they fall within the coastal environment line. I agree that the title of the policy should be altered to 'preservation' of natural character, and that reference should be included to protecting areas of outstanding and high natural character from inappropriate subdivision, use and development.

102. Submissions 202-III to 202-KKK Department of Conservation specifically request changes to Policy 4.3 to include reference to the 'foreshore', to address concerns with the definition of 'beach'. I agree that including reference to the foreshore would confirm that the policy applies to all those areas that fall within the jurisdiction of the Council. It will also make Policy 4.3 internally consistent, as subclause f) already refers to the beach and foreshore.
103. A number of areas of high natural character were omitted from the notified version of the PDP. These areas are now recommended for inclusion, as outlined in the maps contained in Appendix 5.

3.6.3 Recommendations

104. I recommend that Submissions 451-L to 451-N Rob Crozier and Joan Allin, Submissions 637-A Susan Baird, 638-A Patrick Murray, 641-A Barbara and Murray Scott and Submissions 762-A to 762-D and 762-G to 762-L Lydia Johnston, and Further Submissions 128 Kotuku Park Limited, 241 Lowell Manning and 200 Christopher Ruthe by **accepted in part** by amending the introduction to Chapter 4 Coastal Environment, the text in section 4.1 and Policies 4.2 and 4.3 to clarify references to 'development' and ensure that references to sections of the RMA 1991 and policies contained in the NZCPS 2010 are accurate.
105. I recommend that Submissions 202-EEE and 202-FFF Department of Conservation be **accepted**.
106. I recommend that Submissions 202-GGG, 202-HHH and 202-LLL to 202-NNN Department of Conservation be **accepted in part** by amending Policy 4.3 by amending the title and including reference to protection from inappropriate subdivision, use and development.
107. I recommend that Submissions 202-III to 202-KKK Department of Conservation be **accepted**.
108. I recommend that Submission 191-41 Landlink Ltd is **accepted** through clarifying that areas of outstanding natural character and high natural character in the coastal environment are those that are mapped in the PDP.

109. I recommend that Submission 191-42 Landlink Ltd is **rejected** as I have recommended that references to natural coastal processes be removed in response to other submissions.
110. Specific recommendations for each of the submissions in support or opposition to Policies 4.1 – 4.3 are contained in the table in section 5 of this report.
111. As a consequential amendment I also recommend that the areas of high natural character be clearly identified on the Planning Maps, as outlined in Appendix 5 of this report.

3.6.4 Recommended Amendments

112. I recommend that Section 4.1 be amended as follows:

Natural character ~~in~~ of the coastal environment

The preservation of natural character in the *coastal environment* and its protection from inappropriate subdivision, use and development is a matter of national importance in section 6(a) of the Resource Management Act 1991 (RMA). Policy 13 of the NZCPS requires the preservation of ~~areas of high~~ natural character in the coastal environment, including by the identification of areas of outstanding natural character and areas of high natural character. Policy 14 of the NZCPS promotes the restoration or rehabilitation of natural character including identifying areas for restoration, providing policies and methods in the District Plan and through imposing conditions on consents ~~subdivision and development proposals~~. ~~The policy suggests possible restoration approaches for degraded areas.~~

These policies have been given effect to by identifying and mapping areas of outstanding natural character and areas of high natural character in the *coastal environment* which are shown on the Natural Environment Maps, to enable protection and restoration to occur as part of future development of these areas.

113. I recommend that Policy 4.2 and its explanation be amended as follows:

Policy 4.2 – Identify natural character

Areas of outstanding natural character and areas of high natural character ~~and natural coastal features~~ in the coastal environment are identified and mapped in the ~~district plan~~ District Plan using the following criteria:

- a) natural elements, systems, processes and patterns, which are relatively

Reference

Objectives
2.4, 2.9 &
2.11

Policy 4.2 – Identify natural character

Reference

- unmodified;
- b) the presence of water (lakes, rivers, sea), geological and geomorphological features;
- c) natural landforms and landscapes which are legible and uncluttered by structures or 'obvious' human influence including the natural darkness of the night sky;
- d) places dominated by natural patterns such as the natural movement of water and sediment;
- e) places or areas that are wild or scenic including the presence of vegetation (especially native vegetation) and other ecological patterns.

Explanation

This policy is to give effect to the NZCPS 2010 and Policy 3 of the proposed WRPS. The Council commissioned Isthmus Group Limited to undertake a study in 2011 to identify and map the extent of *areas of high natural character* in the coastal environment. Natural coastal features including dominant sand dunes (in rural and open space zones) have been mapped and have specific rules and standards which apply to them in this plan.

114. I recommend that Policy 4.3 and its explanation be amended as follows:

Policy 4.34 – Protection Preservation of natural character

Reference

Areas of outstanding natural character and areas of high natural character in the coastal environment, significant natural coastal features and habitat will be protected from inappropriate subdivision, use and development by:

Objectives
2.2, 2.4, 2.9
& 2.11

- a) reinstating dunes which function as natural buffers for as much of the coast as practicable;
- b) providing managed public access ways to *the beach and foreshore* and avoiding damage to dunes from unmanaged access;
- c) avoiding encroachment of permanent structures and private uses onto the *beach and foreshore* or public land;
- d) removing existing unnecessary structures and associated waste materials from *the beach and foreshore*;
- e) ~~preventing~~ managing new activities which have adverse effects on natural character values;
- f) retaining a natural *beach* and foreshore including a dry sand *beach* where possible.

Explanation

This policy is to give effect to the NZCPS 2010 and Policy 3 of the proposed WRPS. The *coastal environment* of the Kāpiti Coast includes some significant areas which have a high degree of natural character. These include areas which are inland as well as on the coastal margin itself. These areas are remnants of the original coastal habitats in the District and are particularly significant as there is very little of these dune and wetland habitats remaining in the Wellington region and New Zealand. Along the coastal areas between Peka Peka and Te Horo, where there is relatively little settlement retention of the natural character of *the beach* is particularly valued by the community. Avoiding the location of structures where they can be seen from the beach itself is important.

~~Many activities on the beach and foredunes can significantly affect the natural character of the beach, including private access tracks and structures which encroach into public land. A key problem is damage to coastal vegetation and dieback which then leads to erosion of the dunes and dune blowouts.~~

~~Natural dune systems, where native sand-binding plants (spinifex and pingao) predominate, provide an effective buffer against coastal erosion. Where land is taken for coastal esplanades, planting with sand-binding plants will enhance the ability of the land to buffer erosion. Restoration planting of private land adjacent to the coast also has the potential to provide a buffer.~~

115. I recommend that the landward extent of the coastal environment line on the Planning Maps is amended as outlined in Appendix 5

116. I recommend that areas of outstanding natural character are identified on the Planning Maps as outlined in Appendix 6

3.7 Restoration of Natural Character

3.7.1 Matters Raised by Submitters

117. Submissions 150-6 Te Runanga o Toa Rangatira Inc, 411-B Land Matters Ltd, 441-A Greater Wellington Regional Council and 477-A Kapiti-Mana Forest and Bird, all either support, or support in part Policy 4.4.

118. A number of submitters have suggested amendments to the wording of Policy 4.4. Submissions 202-000 and 202-PPP Department of Conservation request amendments to more closely align the wording of Policy 4.4 with that of Policy 14 of the NZCPS 2010. Submission 451-P Rob Crozier and Joan Allin and Submission 762-N Lydia Johnston request the deletion or amendment of Policy 4.4 to both make it less extreme and more appropriately focussed and qualified, and to ensure that it gives effect to the NZCPS 2010 and the RMA. Submission 208-B Transpower New Zealand Ltd requests an amendment to Policy 4.4(e) to recognise regionally significant infrastructure. Submission 191-41 Landlink Ltd requests that the reference to natural character be clarified.

119. The following submissions all oppose Policy 4.4:

- 198-F Helen Punton
- 356-G Christopher Ruthe
- 378-F Coastal Ratepayers United
- 430-D Janet Lang
- 575-C Christopher Butler
- 605-C Philip and Dorothy Tortell
- 653-B Quentin Poole
- 699-B Rosalind Poole
- 705-J Neil Butler
- 715-Q Sharif Family Trust
- 756-V Pascal Odjik

- 757-V Marianne Tavenier

3.7.2 Assessment

120. I do not consider that the wording proposed by the Submissions 202-OOO and 202-PPP Department of Conservation are appropriate. Policy 14 of the NZCPS requires that:
- areas and opportunities for restoration or rehabilitation are identified;
 - policies, rules and other methods directed at restoration or rehabilitation are provided in plans; and
 - where practicable, restoration or rehabilitation conditions are imposed on resource consents and designations.
121. However, the wording proposed by the Department of Conservation has the potential to make Policy 4.4 read as if the Council was going to undertake each of the activities listed in sub-parts a) to f). I consider that the existing wording of Policy 4.4 provides appropriate guidance for the consideration of land use and subdivision consents, and is consistent with the requirements of Policy 14 of the NZCPS 2010.
122. In relation to the amended wording sought by Submissions 451-P Rob Crozier and Joan Allin and 762-N Lydia Johnston I consider that reference to development appropriately reflects the requirements of Policy 14(c) of the NZCPS 2010, which anticipates that conditions would be imposed on resource consents. Matters relating to enabling activities in the coastal environment are addressed in section 3.3 of this report. I agree however that the current wording of Policy 4.4 does not reflect the allowances made in Policy 14 of the NZCPS, particularly in relation to the acknowledgement contained in that policy that restoration and rehabilitation conditions may not always be practicable, and references to 'redundant' structures. I have therefore recommended amendments to Policy 4.4 to ensure it more accurately reflects Policy 14 of the NZCPS 2010. These amendments will also address the concern raised by Submission 208-B Transpower New Zealand Limited.
123. As Policy 4.4 is consistent with Policy 14 of the NZCPS 2010, I do not consider that further clarification of the term 'natural character' as requested by Submission 191-41 Landlink Ltd is necessary or appropriate.
124. For the same reason the submissions in opposition to Policy 4.4 should be rejected.

3.7.3 Recommendations

125. I recommend that Submissions 202-OOO and 202-PPP Department of Conservation be **rejected**.
126. I recommend that Submission 451-P Rob Crozier and Joan Allin and Submission 762-N Lydia Johnston be **accepted in part** by making the amendments as outlined in section 3.7.4 below.

127. I recommend that Submission 208-B Transpower New Zealand Ltd be **accepted in part** by making the amendments as outlined in section 3.7.4 below.
128. I recommend that Submission 191-41 Landlink Ltd be **rejected**.
129. I recommend that submissions in support of Policy 4.4 be **accepted** and that submissions in opposition to Policy 4.4 be **rejected** as outlined in the table in Section 5 of this report.

3.7.4 Recommended Amendments

130. I recommend that Policy 4.4 be amended as follows:

Policy 4.4 – Restore natural character	Reference
<p>Subdivision and development in the <i>coastal environment</i> will support restoration of natural character values through, <u>where practicable</u>:</p> <ul style="list-style-type: none"> a) creating or enhancing indigenous habitats and ecosystems, using local genetic stock; b) encouraging natural regeneration of indigenous species, while effectively managing weed and animal pests; c) rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarshes; d) restoring and protecting riparian and intertidal margins; or e) removing <u>redundant</u> coastal structures and materials that do not have heritage or amenity values; or f) redesign of structures that interfere with ecosystem processes. 	<p>Objectives 2.2, 2.4 & 2.9</p>

Explanation

This policy gives effect to policy 13 and 14 of the NZCPS. ~~The areas which have a high potential for restoration were identified in a study undertaken in 2010. The rules which implement this policy enable a greater level of development if large scale restoration or protection of natural areas is undertaken as part of subdivision or development.~~

3.8 Public Access

3.8.1 Matters Raised by Submitters

131. Submission 726-B Peter Evens opposes Section 4.1 'Public Access' as the submitter considers that the right to public access is at the expense of private and commercial investment.
132. Eighteen submitters seek that section 4.1.1 (all policies, including Policies 4.3 and 4.5) be deleted as they consider the policies are highly restrictive, and are inconsistent with the NZPCS 2010 and RMA.

133. Submission 202-III Department of Conservation seeks that Policy 4.3(b) is amended to better align with the NZCPS by inserting 'and foreshore' after 'public access to the beach'. Further submitters 200 Christopher Ruthe, 227 Coastal Ratepayers United, 230 Heather Paul and Peter Jones opposed Submission 202-III in part as they considered that the whole policy needed to be re-worded.
134. Submissions 55-F Leslie D'Mello, 280-B Bryce Wilkinson, 356-G Christopher Ruthe, 378-F Coastal Ratepayers United, 451-N Rob Crozier and Joan Allin, 545-D Hilary Peterson Family Trust, 479-D Richard Bull, 705-J Neil Butler, 715-Q Sharif Family Trust, 756-V Pascal Odijk, 757-V Marianne Tavenier, 762-O Lydia Johnston all oppose Policy 4.3 as:
- It is considered to be inconsistent with the NZCPS (55-F, 451-N, 479-D, 705-J, 756-V, 756-V and 715-Q)
 - Policy is not in accordance with the RPS (451-N)
 - It does not give adequate weight to community well-being (280-B, 356-G, 378-F, 545-D, 705-J, 715-Q and 762-O)
 - It has potential to unnecessarily restrict private property rights (280-B, 356-G, 378-F, 451-N, 545-D, 705-J, 715-Q and 762-O)
 - It is confusing and poorly drafted (451-N and 762-O)
 - Does not enable appropriate protection structures (451-N, 451-O and 762-O)
135. Further submission 128 Kotuku Park Limited supports Submission 451-N. Further submitters Lowell Manning opposes submission 451-N.
136. Submission 762-K – Lydia Johnston seeks that the word 'avoiding' is removed from policy 4.3.
137. Submission 568-A Ross Boyd supports policy 4.3 as it provides for the communities best interests.
138. Submission 738-G Denis and Jan Toohey oppose the reference to coastal esplanades (in particular in Otaki) in Policy 4.3 explanation.
139. Submitters 432-F Stephen Lang and 738-3 Denis and Jan Toohey, seek that vehicles are restricted from accessing the dunes, in order to protect dunes and maintain a level of amenity.
140. Submissions 451-N Rob Crozier and Joan Allin and 762-C and 762-M Lydia Johnston seek that a new rule is inserted into the PDP which provides for appropriate activities to occur within the coastal environment such as bollards and other public amenity structures.
141. Submissions 55-F Leslie D'Mello, 280-B Bryce Wilkinson, 356-G Christopher Ruthe, 378-F Coastal Ratepayers United, 394-J Anthony Reeve, 451-Q Rob Crozier and Joan Allin, 545-D Hilary Peterson Family Trust, 705-J Neil Butler, 715-Q Sharif Family Trust, 762-O Lydia Johnston all oppose Policy 4.5 as:

- It is considered to be inconsistent with the NZCPS (55-F, 451-Q, 705-J and 715-Q)
 - It does not give adequate weight to community well-being (280-B, 356-G, 378-F, 394-J, 545-D, 705-J, 715-Q and 762-O)
 - It has potential to unnecessarily restrict private property rights (280-B, 356-G, 378-F, 394-J, 451-Q, 545-D, 705-J, 715-Q and 762-O)
 - It is confusing and poorly drafted (451-Q and 762-O)
142. Further submission 128 Kotuku Park Limited supports Submission 451-Q. Further submitters Lowell Manning opposes submission 451-Q.
143. Submission 72-1 Ann Kennedy-Perkins seeks that Policy 4.5 is amended to include public access to riparian strips along rivers and streams.
144. Submission 202-QQQ Department of Conservation supports Policy 4.5 in part but seeks that it is amended to provide certainty for decisions makers and better reflect the NZCPS 2010. Submission 202-QQQ seeks that '*Subdivision and development in the coastal environment will* and '*while minimising any significant adverse effects on the public's use and enjoyment of the coast*' is deleted from the policy to achieve this.
145. Submission 202-QQQ is opposed by further submitters 29 Crozier Family Trust and Allin Family Trust, 200 Christopher Ruthe, 227 Coastal Ratepayers United and 230 Heather Paul and Peter Jones.
146. Submission 441-B Greater Wellington Regional Council supports Policy 4.5 in part but seeks that it is reworded for clarification.
147. Further submitter 241 Lowell Manning supports the submission on policy 4.5. Further submitters 29 Crozier Family Trust and Allin Family Trust, 113 Suzanne Chetwin, 128 Kotuku Park Ltd, 200 Christopher Ruthe, 227 Coastal Ratepayers United, 230 Heather Paul and Peter Jones and 239 Christopher Butler oppose Submission 441-B to amend Policy 4.5, while 20 other further submitters oppose submission 441-B as they consider that the NZCPS and RMA have not been applied properly.
148. Submission 406-F Paekakariki Community Board seeks that the PDP is amended or a new policy is added which seeks to maintain existing view shafts to the sea from residential areas, and to promote ease of access to the beach.
149. Submissions 605-D Philip and Dorothey Tortell and 673-C Peter Clemerson support Policy 4.5 but comment that KCDC, by building a rock revetment along Marine Parade, has destroyed what used to be a dry beach during high tide.
150. Submission 568-A Ross Boyd supports Policy 4.5 as it provides for the communities best interests.

151. Submission 716-E and 716-1 Jenny Parry seek that the PDP acknowledge the Council's statutory role of improving wellbeing through the coordination of public works, including the continuous maintenance and upgrading of the beachfront.
152. Submission 759-C Don Wignall and 589-1 Amuri Partnerships seek that existing council community assets (such as the Marine Parade walkway or other infrastructure) are maintained.
153. A large number of submitters (84) seek that KCDC consider the development of a 'high specification walkway, similar to the walkway constructed at the Poplar Road end of the Esplanade in Raumati South, as an alternative high amenity, functional and durable solution to many of the perceived coastal hazards in the PDP'.
154. Other submissions also seek other types of access located along the coast:
 - A path north of the Esplanade which is similar to the existing path south of the Esplanade (374-F and 475-G)
 - Construction of a timber walkway from QEII Park to Paraparaumu (470-I)
155. Submitter 545-M Hillary Peterson Family Trust opposes the walkway along the beach frontage between 23 Field Way to the Waimeha Stream, across the foreshore outside of the trust's property.
156. Submissions 406-I Paekakariki Community Board, 594-B Paekakariki Surf Lifesaving Club and 697-C Otaki Surf Lifesaving Club all seek flexibility in the plan and rules which provide for Surf-lifesaving clubs and their facilities, recognising their role in water safety and public access to the beach.

3.8.2 Assessment

157. The submissions in relation to Public Access can be divided into six matters:
 - Amendment to Section 4.1 'Public Access'
 - Deletion of all policies in 4.1.1 as they are inconsistent with the NZCPS and RMA
 - Deletion or amendment of Policy 4.3, part (b)
 - Public access, enjoyment and amenity
 - Enabling appropriate uses/ structures/ development
 - Deletion or amendment of Policy 4.5
158. I do not agree with submission 726-B Peter Evens in that the right to public access is at the expense of private and commercial investment. Generally, public access in the context of the Coastal Environment chapter is about enabling access to the beach and foreshore and other Crown or Council owned property. Furthermore, the provision of esplanade reserves and access through new subdivision to the beach and foreshore stems from legislative requirements such as the NZCPS and achieves community and cultural wellbeing, meeting the purpose of the RMA.

159. Objective 4 of the NZCPS seeks '*to maintain and enhance the public open space qualities and recreation opportunities of the coastal environment*' by '*maintaining and enhancing public walking access to and along the coastal marine area...*'. Objective 6 of the NZCPS seeks to '*enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development...*'.
160. Below these objectives sit a number of policies which also relate to public access and amenity of the coastal environment, specifically Policies 3, 6, 13, 18, 19 and 20.
161. With regard to the submission points relating to section 4.1.1 and Policies 4.3 and 4.5 being inconsistent with the RMA and the NZCPS, the PDP and the policies contained within Chapter 4 Coastal Environment were written with consideration to the relevant sections of the RMA and the policies of the NZCPS. I consider that generally, section 4.1.1 and Policies 4.3 and 4.5 are consistent with the NZCPS, however, I recommend some amendments to further align section 4.1.1 and Policies 4.3 and 4.5 with the NZCPS.
162. Policy 4.3(b) seeks that 'Areas of high natural character in the coastal environment, significant natural coastal features and habitat will be protected by: ... (b) providing managed public access ways to the beach and avoiding damage to dunes from unmanaged access;...'. The submitters' main criticisms of this policy are that it is not in accordance with the RPS (451-N), does not give adequate weight to community wellbeing (280-B, 356-G, 378-F, 545-D, 705-J, 715-Q and 762-O), has potential to unnecessarily restrict private property rights (280-B, 356-G, 378-F, 451-N, 545-D, 705-J, 715-Q, 762-K and 762-O), requires drafting amendments (202-III, 451-N and 762-N), and doesn't enable appropriate protection structures (451-N, 451-O and 762-O).
163. I do not consider that Policy 4.3(b) is inconsistent with either the NZCPS or the RMA. Looking at the relevant submissions, the concern that Policy 4.3 is inconsistent with the NZCPS and RMA appears to arise from coastal hazards issues and other issues which are not relevant to public access to the coastal environment.
164. I do not consider that policy 4.3(b) is inconsistent with the operative RPS or the proposed RPS as suggested by Submission 451-N. Objective 8 of the operative RPS and the proposed RPS seeks that 'Public access to and along the coastal marine areas, lakes and rivers is enhanced'. I consider that Policy 4.3(b) is entirely consistent with Objective 8, and other objectives in the operative and proposed RPS, which seek to protect natural character and habitat.
165. I consider that Policy 4.3(b) does give adequate weight to community wellbeing as it provides a policy framework which provides public access to the coastal environment, while enabling protection of those aspects of the coastal environment which create amenity.

166. I do not consider that Policy 4.3(b) restricts private property rights as the policy largely applies only to public property such as the beach and foreshore, open space zones, reserves and esplanade strips.
167. I do agree that Policy 4.3(b) would benefit from redrafting to provide clearer direction and increase consistency with the NZCPS. Submissions 451-N, 762-O and 762-K seek that Policy 4.3(b) is redrafted to clarify, and make the wording less extreme. However, I do not consider that Policy 4.3(b) is worded too severely as it is, and the use of the term 'avoid' is appropriate as it is avoiding unmanaged access, which indicates that access will be enabled elsewhere (managed access).
168. Submission 202-III suggests amended wording as below to provide clearer direction and consistency with the NZCPS. I consider that the amendment of inserting 'and foreshore' is appropriate to improve clarity and NZCPS consistency

b) providing managed public access to the beach and foreshore
and avoiding damage to dunes from unmanaged access...

169. I do agree that appropriate activities need to be better enabled, and note that I consider this provided for with reference to 'managed' and 'unmanaged' access in Policy 4.3(b). I agree that the PDP should provide direction related to some structures which will assist with managing access (bollards etc...) and also contribute to the enjoyment of amenity (walkways, seating, rubbish bins). However, it is more appropriate for the provisions which manage these structures to be located in the Open Space Chapter as the zone in which these structures are likely to be located is the Open Space (Conservation and Scenic) Zone or the Open Space (Recreation) Zone.
170. Within areas of outstanding natural character area and areas of high natural character, I consider that in some cases, certain appropriate structures relating to public access and amenity should be provided for under a permissive rule framework. As such I consider that a new permitted activity rule is appropriate to be interested into Chapter 4 Coastal Environment. Additionally, permitting these types of structures will contribute to the management of vehicle access to the beach, dunes and foreshore – addressing submissions 432-F and 738-3.
171. Submission 738-G seeks that the reference to coastal esplanades in Policy 4.3 explanation be removed. Explanations are being removed across the whole PDP, and therefore this submission point does not need to be addressed.
172. Policy 4.5 seeks that subdivision and development in the coastal environment will maintain and enhance amenity values such as open space and recreation, including public enjoyment and access along the coast, while minimising any adverse effects of the public's use and enjoyment.
173. The main criticisms of Policy 4.5 by submitters is that it does not give adequate weight to community well-being (280-B, 356-G, 378-F, 394-J, 545-D, 705-J, 715-Q and 762-O), it has potential to unnecessarily restrict private property rights (280-B,

356-G, 378-F, 394-J, 451-Q, 545-D, 705-J, 715-Q and 762-O) and it requires drafting amendments (202-QQQ, 441-B, 451-Q and 762-O).

174. Policy 4.5 focusses on enabling public access to, and enjoyment of, the coastal environment, and provides for the maintenance and enhancement of amenity values while minimising any significant adverse effects. I consider that Policy 4.5 gives adequate weight to community wellbeing, as the policy aims to ensure that public access and enjoyment is maintained and enhanced.
175. Similarly, I do not agree that Policy 4.5 restricts private property rights, as Policy 4.5 largely relates to access to public land and open space along the coast. Ensuring that new development does not restrict access to the coastal environment helps to maintain amenity and is consistent with the RMA.
176. I agree that Policy 4.5 could benefit from amendments to wording. The SEV version of Policy 4.5 suggested that the policy be amended as below:
Policy 4.5 – Amenity and Public Access
~~Subdivision and development in the coastal environment will m~~Maintain and enhance amenity values in the coastal environment, such as open space and scenic values, and provide opportunities for recreation and the enjoyment of the coast, including the enjoyment of a high tide dry beach by the public and public access to and along the coast, ~~while minimising any significant adverse effects on the public's use and enjoyment of the coast.~~
177. The SEV version is largely based on amended wording of Submission 202-QQQ and 441-B. I agree that this amended wording provides more clarity, better reflects the NZCPS and generally achieves submissions 451-Q and 762-O. Explanations are being removed across the PDP which therefore addresses the concern of Submissions 451-Q and 762-O.
178. I consider that Policy 4.5 adequately provides for public access to riparian strips and streams within the coastal environment through providing for access within the open space zones and maintaining or enhancing this access. I consider that Policy 4.5 adequately addresses the concerns raised in Submissions 72-1, 716-E and 716-1.
179. I consider that the PDP does consider open space and esplanade reserves as community assets, contrary to the concerns raised by submission 534-2. Policy 4.5 specifically recognises the amenity provided by the coastal environment through open space and scenic values.
180. The framework provided by Policy 4.5 also addresses Submission 406-F which is concerned with the PDP promoting the ease of access to the beach. In relation to the protection or maintenance of existing view shafts from residential properties to the beach sought through submission 406-F, I consider this a matter in the zone rules relating to height, setbacks and outlook requirements for new development and is not a matter to be covered by Chapter 4 Coastal Environment.

181. I acknowledge that some coastal protection structures or public access structures have the potential to impact on the amenity and function of the coastal environment as identified by submissions 605-D and 673-C. However I consider that the proposed policies and rules within the PDP can provide protection and enhancement for those areas that remain where possible following some minor amendments.
182. I agree that existing community assets should be maintained where practicable, or unless there are adverse environmental effects relating to amenity from doing so. As such I agree in part with the relief sought by 759-C and 589-1, however consider that the proposed policy framework will provide guidance on when, where, if and how this maintenance should occur.
183. A number of submitters seek either a walkway. I consider that the provision of a walkway in a specific area is not the role of the district plan, however those activities which may be undertaken to construct a walkway (earthworks) are already adequately controlled through provisions in the PDP.
184. With regards to submission 545-M the foreshore is public property and any proposed walkway is not a district plan matter. The relief sought by 545-M cannot be achieved through a district plan.
185. I recognise the need to provide for appropriate activities such as surf lifesaving clubs and agree that they play a role in the public use, access and enjoyment of the coastal environment. Submissions 406-I, 594-B and 697-C all seek that rules in the plan are flexible to enable surf lifesaving clubs to operate. There are three surf lifesaving clubs located in the Kapiti District at Otaki, Paekakariki and Waikanae beaches. It should be noted that these club rooms are all located outside of areas of natural character, and therefore are subject to Open Space Zone rules. The Open Space zone rules provide sufficient flexibility for their continued operation.

3.8.3 Recommendations

186. I recommend that submission 726-B is **rejected**.
187. I recommend that submissions 358-J, 362-F, 378-E, 394-I, 430-C, 451-K, 479-D, 545-C, 577-G, 619-H, 622-G, 646-D, 647-D, 678-H, 705-I, 715-C 756-J and 757-J and further submissions 128 and 229 are **rejected** as I do not consider that section 4.1.1 is inconsistent with the NZPCS, RMA or is too restrictive. It is inappropriate to delete Section 4.1.1.
188. I recommend that submissions 55-F, 451-N, 479-D, 705-J, 756-V and 715-Q, where they related to policy 4.3 and consistency with the NZCPS are **accepted in part** as I consider that Policy 4.3 could benefit from minor wording to better reflect the NZCPS.
189. I recommend that submission 202-III is **accepted** as the amendment proposed to 4.3(b) better reflects the NZCPS.
190. I recommend that further submissions 200, 227 and 230 are **rejected**.

191. I recommend that submission 762-K, which seeks that 'avoiding' is removed from policy 4.3(b), is **rejected**.
192. I recommend that submission 451-N which submits that policy 4.3(b) is not in accordance with the operative and proposed RPS is **rejected**.
193. I recommend that submissions 280-B, 356-G, 378-F, 545-D, 705-J, 715-Q and 762-O, where they submit that Policy 4.3(b) does not give adequate weight to community well-being are **rejected**.
194. I recommend that submissions 280-B, 356-G, 378-F, 451-N, 545-D, 705-J, 715-Q and 762-O, where they submit that policy 4.3(b) unnecessarily restricts private property rights are **rejected**.
195. I recommend that submissions 202-III, 451-N and 762-N, where they submit that policy 4.3(b) requires redrafting for clarity are **accepted**.
196. I recommend that submissions 451-N, 451-O, 762-C, 762-M and 762-O, where they submit that Policy 4.3(b) does not provide for appropriate structures is **accepted in part**, by inserted a rule into Chapter 4 Coastal Environment which permits minor structures related to public access.
197. I recommend that submissions 432-F and 738-3 are **accepted** and the management of vehicle access to the beach, foreshore and dunes is achieved through a new rule which permits certain structures in the coastal environment (including those that will manage vehicle access such as bollards and gates).
198. I recommend that Submission 738-G is **rejected** as explanations are to be removed from the PDP.
199. I recommend that submissions 55-F, 451-Q, 479-D, 705-J, 756-V and 715-Q, where they related to Policy 4.5 and consistency with the NZCPS are **accepted in part** as I consider that Policy 4.5 could benefit from minor wording to better reflect the NZCPS.
200. I recommend that submission 202-QQQ is **accepted** as the amendment proposed to Policy 4.5 better reflects the NZCPS.
201. I recommend that submission 451-N which submits that policy 4.3(b) is not in accordance with the operative and proposed RPS is **rejected**.
202. I recommend that submissions 280-B, 356-G, 378-F, 394-J, 545-D, 705-J, 715-Q and 762-O, where they submit that Policy 4.5 does not give adequate weight to community well-being are **rejected**.
203. I recommend that submissions 280-B, 356-G, 378-F, 394-J, 451-Q, 545-D, 705-J, 715-Q and 762-O, where they submit that Policy 4.5 unnecessarily restricts private property rights are **rejected**.

204. I recommend that submission 202-QQQ, seeking that Policy 4.5 is rewording to provide certainty for decisions makers and to better reflect the NZCPS is **accepted**.
205. I recommend that the further submissions from 29, 200, 227 and 230, relating to submission 202-QQQ are **rejected**.
206. I recommend that submissions 441-B, 451-Q and 762-N, where they submit that Policy 4.5 requires redrafting for clarity are **accepted**.
207. I recommend that submission 406-F is **rejected** as this is a matter for the underlying zone rules to manage.
208. I recommend that submissions 589-1, 716-E, 716-1 and 759-C are **rejected** as the policy framework provides for maintenance and upgrading of public space and community assets for community well-being where appropriate.
209. I recommend that submission 534-2 is **rejected** as the PDP clearly recognises open space and esplanade reserves as community assets.
210. I recommend that the submissions from the 88 submitters that sought some form of walkway along the coast are **rejected** as this issue is a matter outside of the scope of the PDP.
211. I recommend that submission 545-M is **rejected** as this is outside of the scope of the PDP.
212. I recommend that submission 406-I, 594-B and 697-C are **rejected** as the flexibility sought is enabled by the underlying zone rules in the Open Space chapter.

3.8.4 Recommended Amendments

213. I recommend that Policy 4.3(b) and its explanation be amended (noting that the rest of Policy 4.3 is the subject of section 3.6 of this section 41A report) as follow:

Policy 4.3 – Protection of natural character

Areas of high natural character in the *coastal environment*, ... will be protected by:

- a) ...
- b) **providing managed public access ways to *the beach and foreshore* and avoiding damage to dunes from unmanaged access;**
- c)

Reference

Objectives
2.2, 2.4, 2.9
& 2.11

Explanation

This policy is to give effect to Policy 3 of the proposed WRPS. ~~The coastal environment of the Kāpiti Coast includes some significant areas which have a high degree of natural character. These include areas which are inland as well as on the coastal margin itself. These areas are remnants of the original coastal habitats in the District and are particularly significant as there is very little of these dune and wetland habitats remaining in the Wellington region and New Zealand. Along the coastal areas between Peka Peka and Te Horo, where there is relatively little settlement retention of the natural character of the beach is particularly valued by the community. Avoiding the location of structures where they can be seen from the beach itself is important.~~

~~Many activities on the beach and foredunes can significantly affect the natural character of the beach, including private access tracks and structures which encroach into public land. A key problem is damage to coastal vegetation and dieback which then leads to erosion of the dunes and dune blowouts.~~

~~Natural dune systems, where native sand-binding plants (spinifex and pingao) predominate, provide an effective buffer against coastal erosion hazards resulting from storms. The natural system will not prevent long term erosion occurring but can adapt to short term erosion. The depth of a dune system will be a key limiting factor in its ability to handle erosion. Where land is taken for coastal esplanades, planting with sand-binding plants will enhance the ability of the land to buffer erosion. Restoration planting of private land adjacent to the coast also has the potential to provide a buffer.~~

214. I recommend that Policy 4.5 and its explanation be amended as follows:

Policy 4.5 – Amenity and public access

~~Subdivision and development in the coastal environment will~~ **Maintain and enhance amenity values, such as open space and scenic values, opportunities for recreation and the enjoyment of the coast, including enjoyment of a high tide dry beach by the public and public access to and along the coast, while minimising any significant adverse effects on the public’s use and enjoyment of the coast.**

Reference
Objectives
2.2, 2.4 &
2.9

Explanation

~~The coast and beach are highly valued by the community for recreation and scenic values. Pedestrian access to and along the coastal marine area is a matter of national importance in the RMA and it is becoming more difficult in southern areas as the beach can only be accessed for a short time around the low tide. The use of the beach can have adverse effects on coastal systems. For example dune plants can be destroyed by uncontrolled pedestrian access across dunes. Rules which implement this policy include providing esplanade reserves and requiring public access ways as part of subdivision and including coastal access routes/ways on District Plan Maps.~~

215. I recommend that a new permitted activity rule is inserted into Chapter 4 Coastal Environment as follows:

Rule 4A.1. Permitted Activities

The following activities are **permitted** activities, provided that they comply with all corresponding permitted standards (unless otherwise specified).

Permitted Activities	Standards	Reference
<p>1. <u>Public access and amenity structures in areas of outstanding natural character and areas of high natural character.</u></p>	<p>1. <u>Permitted public access and amenity structures must be one of the following:</u></p> <ul style="list-style-type: none"> a. <u>Rubbish bin with capacity of 100L less;</u> b. <u>Public seating not exceeding 2000mm in length, 600mm in width and 900mm in height;</u> c. <u>Bollards with a height of 900mm or less;</u> d. <u>Fencing of less than 1.5m of height above ground;</u> e. <u>Gates of less than 1.5m in height.</u> <p>2. <u>Earthworks for the installation or construction of structures 1(a) to (e) above, must not exceed more than 2m² of disturbance.</u></p>	<p><u>Policies 4.3, & 4.5</u></p>

3.9 Protection of Natural Dunes

3.9.1 Matters Raised by Submitters

216. Submission 38 North Otaki Beach Resident Group (NOBRG) seeks recognition that inlet management is important for the conservation of the natural dune systems and that dune management is a practicable option for the protection of communities (submission 38-G). However submission 38-K, opposes Policy 4.7 where it provides for inland migration of natural dune systems.
217. Submission 55 Leslie D'Mello opposes the references to 'managed retreat' in the explanation for policy 4.6 and 'natural dunes being enabled to migrate inland in response to shoreline retreat' in policy 4.7.
218. Submission 72 (which also supports the general relief sought by Submission 38) seeks that inland migration occurs only in rural and open space areas ((Submission 72-B).
219. Submission 139 Raumati South Residents Association supports promoting and encouraging the restoration of sand dunes on public land (submission 139-5(A)). Submission 139 is particularly concerned with the Whareroa inland dune system, and seeks that what remains of this dune system is preserved.
220. Submission 150 Te Runanga o Toa Rangatira Inc supports Policies 4.3, 4.4, 4.6 and 4.7 where they relate to the protection and restoration of natural dunes (Submission 150-6).
221. Submission 190 Ken Moselen seeks that Policies 4.6 and 4.7 are deleted, or alternatively amended to explicitly permit landowners to protect their properties from natural coastal processes (Submission 190-E, 190-F and 190-G).

222. Submission 198 Helen Punton, seeks that 'enables to migrate in response to the shoreline' is deleted from Policy 4.7 (submission 198-H).
223. Submission 202 Department of Conservation supports in part Policies 4.6 and 4.7, and seeks some amendments to the wording of policies and their explanations.
- Minor wording changes for clarity to Policy 4.6 (submission 202-2);
 - Minor wording changes for clarity to Policy 4.6 explanation (submission 202-3);
 - Minor wording changes to Policy 4.7 to note the value of other natural defences against shoreline erosion and to improve clarity (submission 202-4);
 - Amendment to policy 4.7 to address value of other natural defences (202-5)
 - More extensive amendments to Policy 4.7 (or a new policy) to acknowledge different management responses to coastal erosion, strategic approaches to address types of erosion (submission 202-6 and 202-8);
 - Minor wording changes to the Policy 4.7 explanation to acknowledge different erosion drivers such as short term, periodic erosion and long term erosion trends (submission 202-7)
224. Further submitters 200 Christopher Ruthe, 227 Coastal Ratepayers United Inc, and 230 Heather James and Paul Jones oppose submissions 202-2 and 202-3. Further submitters 29 Crozier Family Trust and Allin Family Trust, 200 Christopher Ruthe, 227 Coastal Ratepayers United Inc, and 230 Heather James and Paul Jones support in part that there was a lack of clarity with Policy 4.7, but oppose the wording put forward by submission 202 in Submission 202-6, 202-7 and 202-8.
225. Submission 232 Nga Hapu O Otaki supports those policies which protect dune systems (submission 232-A).
226. Submission 378 Coastal Ratepayers United Incorporated (CRU) represents a group of ratepayers on the Kapiti Coast. 211 submissions on Chapter 4 support the relief sought by the CRU and in most cases seek the same relief. The CRU:
- Opposes Policy 4.6 as it is not always appropriate to accommodate natural shoreline movement in all cases (Submission 378-F); and
 - Opposes Policy 4.7 as the CRU does not consider that dunes should be enabled to migrate inland where there will be unreasonable effects on existing communities. The CRU considers that there are alternative dune management options available (submission 378-F)
227. In addition to the 211 submissions which supported the relief sought by CRU, further submissions were received from 26 submitters in support of the entire CRU submission, while one further submission – 241 Lowell Manning opposes the submission.
228. Submission 411 Land Matters Limited, considers that Policy 4.6 is premature until a more comprehensive management strategy to determine where the shoreline might move is developed (submission 411-A).

229. Submission 432 Stephen Lang, opposes Policy 4.6 as there is no definition of 'natural shoreline' or boundaries shown on maps (submission 432-D). Submission 432 also seeks amendment to the policy framework for dunes to restrict vehicle use on the dunes and foreshore to assist with dune protection and restoration (submission 432-F).
230. Submission 441 Greater Wellington Regional Council suggests amendments to the explanations of Policies 4.6 and 4.7: to reinforce why it is important to achieve a natural shoreline for coastal management purposes (submission 441-C), and to clarify the wording around natural dunes and their associated processes, providing a buffer to development located behind the dunes (submission 441-E).
231. Further submitter 241 Lowell Manning supports this submission, while submitter 128 Kotuku Park Ltd supports Submission 441 on Policy 4.7. Further submitters 227 and 230 oppose the submission on Policy 4.6; further submitters 113, 200 and 239 seek that submission 441 on Policies 4.6 and 4.7 be disallowed; and 20 further submissions oppose submission 441 as they consider that the NZCPS and RMA have been incorrectly applied through Policies 4.6 and 4.7.
232. Submission 451 Joan Allin and Rob Crozier seeks that:
- Policy 4.6 be amended as it is too extreme by not distinguishing between areas where development has already occurred, noting that it will not always be appropriate to accommodate natural shoreline migration inland(submission 451-R);
 - The reference to large sections of coast which have a natural dune system adjacent to the beach including urban areas in Otaki, Te Horo, Peka Peka, Waikanae, is retained, however the submission seeks that the phrase 'in all areas the control of additional development in close proximity to the coast will ensure that natural shoreline movements can be accommodated' contained in the explanation for Policy 4.6 is deleted (submission 451-R);
 - Policy 4.7 is qualified to enable appropriate activities, and reconsidered following further work on the policy of managed retreat (submission 451-T); and
 - a new policy is inserted which takes into account that Te Horo beach is part of an accreting coast, with a gravel/ sand beach and substantial gravel dunes between the sea and beachfront property boundaries, posing no natural hazard risk to people and property (submission 451-M7).
233. 15 submissions sought the same relief as submission 451. Further submitter 128 Kotuku Park Ltd supported the submission on Policy 4.6, further submitters 113 Suzanna Chetwin, 128 Kotuku Park Ltd, 200 Christopher Ruthe, and 230 Heather Paul and Peter Jones supported the request that Policy 4.7 provide for appropriate activities, while further submitter 229 Ken Moselen supported the entire submission.
234. Submission 477 Kapiti-Mana Forest and Bird supports Chapter 4, specifically the recognition of dune and dune systems and the need to take into account biodiversity

as part of resource consent applications (submission 477-A). Submission 477-A is opposed by further submitter 229 Ken Moselen.

235. Submission 597-H Steve and Emily Simpson, seeks for the PDP to be amended to increase dune restoration activity.
236. Submission 605-C Philip and Dorothy Tortell seek that Policies 4.6 and 4.7 be deleted as:
- Policy 4.6 does not recognise that people live along the coastal strip (giving Kapiti its distinctive character). Furthermore, submission 605-C considers that that accommodating natural shoreline movement is contrary to the NZCPS as it does not allow communities to protect their properties providing for social and economic wellbeing; and
 - Policy 4.7 does not recognise that in Paekakariki, the natural dune option is not available, due to the presence of the rock revetment along Marine Parade which as a result, does not provide for a dry beach at high tide.

Submission 605-C considers that if Policy 4.6 isn't deleted then a new policy will need to be inserted which aims to protect, to the extent possible, the built environment and outline how KCDC will assist ratepayers in doing this.

237. Submission 653 Quentin Poole and 699 Rosalind Poole, both seek that Policy 4.6 be deleted, or a new policy inserted to balance Policy 4.6, for the same reasons outlined by submission 605-C above.
238. Further submission 229 Ken Moselen, supports both submission 605 and submission 653.
239. Submission 687 Ian and Penny Redward seek a guarantee through the PDP that soft management of sand dunes, in particular dune restoration programmes, will continue (submission 687-D and 687-G).
240. Submission 711 Peter Katz seeks that positive actions such as dune planting should be a management option to protect and restore dunes and dune systems. Submission 711 seeks that a policy outlining these positive actions be inserted into the PDP (submission 711-B).
241. Submission 738 Denis and Jan Toohey seeks that vehicles be restricted from the beach and foreshore in an effort to protect dunes and reduce erosion and dune blowout (submission 738-3).
242. Submission 762-R Lydia Johnston seeks that policy 4.7 is qualified to enable appropriate activities, and reconsidered following further work on the policy of managed retreat.
243. Submission 773 William (Bill) Garlick seeks that KCDC develops a plan of selective planting to assist with dune restoration and protection (submission 773-F).

244. All other submission points relating to dune management raised points similar to those above – and addressing the submission points identified in section 3.3.1 should, in most cases address those points raised by other submitters.

3.9.2 Assessment

245. The submissions in relation to dune management can be divided into four matters:

- Deletion or amendment of Policy 4.6
- Deletion or amendment of Policy 4.7
- Recognition that dunes are a natural buffer to development and infrastructure
- Restoration and protection of dune systems

246. Policies 4.6 and 4.7 are the two main policies which relate to dune management. Policies 4.3 and 4.4 relate to dunes where they are identified as having natural character.

247. Objective 1 of the NZCPS seeks to “*safeguard the integrity, form, function and resilience of the coastal environment and sustain ecosystems, including marine and intertidal areas, estuaries, dunes and land...*”. Objective 6 of the NZCPS seeks to “*enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development...*”. The main issues with Policies 4.6 and 4.7 are the interpretation, application and balancing of natural environmental processes, and the protection of communities and private property.

248. Policy 4.6 seeks that natural shoreline movement will be accommodated and the resilience of coastal communities will be increased by using best practice coastal management options. The main criticisms of this policy are from submitters who consider that the policy lacks protection for existing development along the coast, or fails to recognise that the development along the coastal strip is what gives the Kapiti District its distinctive character. There were also concerns about what defines the natural shoreline, and how this will be identified.

249. Concern from those submitters who oppose Policy 4.6 come from the wording ‘*natural shoreline movement will be accommodated*’ (submissions 190, 378, 411, 432, 451, 605 and 653). The reasons for this include:

- Does not provide clarity as to if people are able to protect their property from shoreline movement (submission 190-B and 190-F)
- Does not recognise that it is not always appropriate to accommodate natural shoreline movement (Submission 378-F)
- There is no certainty as to where the shoreline may move (submission 411-A and 411-B)
- No definition or identification of natural shoreline (submission 432-D)
- The policy is too extreme and doesn’t take into account existing development along the coast (submission 451-R, 653-U and 653-1).

250. Submitters commended the recognition in the explanation for Policy 4.6 of urban areas along the coast, however, had concern that the policy didn't provide protection for these areas.
251. Submitter 55-B opposed the reference to managed retreat contained in the explanation for policy 4.6.
252. I acknowledge that natural shoreline movement may not always be able to be accommodated, especially in areas where there are already seawall defences (Paekakariki) and where there are no natural dune systems. In some cases, the seawalls protect transportation infrastructure (The Parade and Marine Parade).
253. Where there is a natural dune system (for example between Toru Road in Paraparaumu and the northern coast of the Kapiti District), I consider that these dune systems should be protected and this is supported by submissions 139, 150, 202, 232, 432, 477, 687, 711, 738 and 773.
254. I do not consider that Policy 4.6 should be deleted (which was proposed by a large number of submitters), but do agree with submissions seeking clarification of the policy (in particular Submissions 202 and 451).
255. I consider that the natural shoreline is clearly defined within Chapter 4 Coastal Environment and the RMA. The natural shoreline is generally accepted as being Mean High Water Springs (MHWS), while Chapter 4 Coastal Environment identifies the extent of the coastal environment, including dunes and landforms affected by natural coastal processes. The only complexity is that the natural shoreline can and will change overtime, making it difficult and inaccurate to map. Therefore I recommend rejecting submission 432-D.
256. The SEV version sought that the explanation be deleted in its entirety, and the policy amended as below:
Policy 4.63.33 – Natural coastal processes
Natural shoreline movement will be ~~accommodated~~ addressed and the resilience of coastal communities will be increased by using ~~the~~ best practice coastal management options, including ~~some~~ one or a combination of the following as appropriate: ...
257. I agree with most of the amendments suggested in the SEV version, however, do not think it is necessary to include 'as appropriate' because best practice is only applied as appropriate.
258. Policy 4.7 seeks that 'natural dune systems will be protected and enhanced, as a buffer for coastal hazard effects and enabled to migrate inland in response to shoreline retreat. The submitters' main points of contention with Policy 4.7 are: how migration inland will be accommodated; inland migration is not possible/ appropriate on all sections of the coast; and clarity or wording suggestions.

259. The explanation for Policy 4.7 notes that natural dunes are home to biodiversity, habitat and provide protection against storm events – and then act as a buffer for areas which are developed beyond the dune.
260. The main points of contention from submitters relate to the wording ‘...and enabled to migrate inland in response to shoreline retreat.’ The issues identified are that this does not enable people to protect their private property.
261. Some other submitters (submissions 38, 72, 139, 232) don’t necessarily oppose enabling dunes to migrate inland, but seek that inland migration is only permitted on public or undeveloped land (e.g. rural dunes).
262. The submission from the Department of Conservation seeks a number of amendments to policy 4.7 and its explanation relating to the recognition of the dunes and beach as a natural erosion buffer (202-4, 202-5 and 202-7), and also a new policy to acknowledge a strategic approach to address long and short term erosion. I consider that the rewording and amendments to policy 4.7 will sufficiently recognise the beach and dunes natural function, which act as a buffer to short and long term erosion events. I do not consider that a new policy is necessary, due to the proposed amendments to both policy 4.6 and 4.7.
263. I consider that ‘natural dunes’ need to be able to operate in a natural manner (or as close to it as possible) otherwise, they may lose their naturalness, and Policy 4.6 would not be achievable. Large portions of the coast already have a dune system located within open space (Conservation and Scenic), Open Space (Recreation) and rural dunes zones and noted on planning maps as sensitive natural features. These areas generally have natural dunes located within public property. I have suggested amendments to Policy 4.7 to reflect this.
264. Areas where natural dune migration is not possible are where there is very little or no dune system, and where developed areas are mainly protected by built infrastructure (seawalls and/ or roads). These areas are generally the coastline south of Toru Road in Paraparamu, to QEII Park, and Paekakariki. These areas have no natural dunes and therefore Policy 4.7 would not apply. I do not consider that this needs to be clarified any further.
265. I agree that dune restoration and protection needs to be further enabled by policies in Chapter 4 Coastal Environment and suggest amendments to Policy 4.7 to reflect this.
266. Submitters 432 and 738 seek that vehicles be restricted or blocked from accessing dunes. I agree that vehicle use on dunes can lead to increased blow-outs, habitat destruction and contribute to dune erosion.
267. The SEV version suggested that the explanation be deleted in its entirety, and the policy amended as below:

Policy 4.7 – Natural dunes

Natural dune systems will be protected and enhanced, as a buffer for coastal hazard effects ~~and enabled to migrate inland in response to shoreline retreat.~~

268. While I agree with the grammatical amendment (removal of “,”), I do not agree with the removal of ‘*and enabled to migrate inland in response to shoreline retreat*’ as I consider that for Policies 4.6 and 4.7 to be effective, Policy 4.7 needs to recognise the natural processes which underpin and enable natural dunes. Furthermore, the policy refers to ‘natural dune systems’, part of which is their shifting and natural processes. However, I do consider that the latter part of the policy should be qualified, such that dunes are able to migrate inland ‘where practicable’, to recognise that in some situations dune migration may not be appropriate.

3.9.3 Recommendations

269. I recommend that Submission 202-2 is **accepted in part**, by: amending Policy 4.6 and removing ‘the’ from before ‘best practice’ and other minor amendments of wording to improve clarity; and amending Policy 4.7.
270. I recommend that Submissions 202-4 and 202-5 are **accepted in part** by amending policies 4.6 and 4.7.
271. I recommend that Submission 202-7 is **rejected**.
272. I recommend that Submission 202-7 is **rejected** as explanations are being removed from the PDP.
273. I recommend that Submission 451-A is **accepted in part**, by rewording Policy 4.6 to improve clarity.
274. I recommend that Submissions 358-J, 362-G, 378-F, 411-B, 451-R, 595-C, 619-H, 622-G, 653-U, 653-1, and 762-P are **accepted in part** by amending the word ‘accommodated in Policy 4.6 to ‘addressed’.
275. I recommend that ‘as appropriate’, which was added into Policy 4.6 in the SEV version is **rejected** as I do not consider it necessary. I consider that the replacement of accommodated with addressed implies the appropriateness of coastal management options being used.
276. I recommend that Submissions 190-E, 190-F and 190-G are **rejected**.
277. I recommend that Submissions 55-B, 202-3, 202-7, 441-C, 441-E and 451-R (regarding the explanation for Policy 4.6), are **rejected** as the explanations are being deleted from all parts of the PDP.
278. I recommend that Submission 432-D is **rejected**, as I do not consider it necessary for there to be a definition of natural shoreline in the PDP.

279. I recommend that Submission 605-C and 653-U are **rejected**, as accommodating natural dune processes is not contrary to the NZCPS.
280. I recommend that Submission 38-G is **rejected**, as Policy 4.6 already recognises that different parts of the coast may need to be treated differently, and enables this to happen.
281. I recommend that Submission 150-6 is **accepted**.
282. I recommend that Submissions 38-K, 72-B and 139-5(a) are **accepted in part**. Generally, the dune systems which are being protected are located within open space and/ non-developable land.
283. I recommend that Submission 202-8 is **accepted in part** to improve readability.
284. I recommend that Submissions 232-A, 687-D 687-G, 711-B and 773-F are **accepted** by amending Policy 4.7 to enable natural dune function and restoration as part of dune protection.
285. I recommend that submission 55-B where it refers to policy 4.7 is **accepted in part**.
286. I recommend that submission 198-H is **rejected**.
287. I recommend that Submission 378-F is **rejected** as natural dunes will protect communities.
288. I recommend that Submission 451-T is **accepted in part** where is related to enabling appropriate activities.
289. I recommend that Submission 451-M7 is **rejected** as it is unnecessary to separate out Te Horo Beach and its natural beach and dune processes.
290. I recommend that Submission 597-K is accepted in part where it seeks amendment to the PDP to increase dune restoration activity is **accepted in part**.
291. I recommend that submission 762-R is **accepted in part**.

3.9.4 Recommended Amendments

292. I recommend that Policy 4.6 and its explanation be amended as follows:

Policy 4.6 – Natural coastal processes

Natural shoreline movement will be ~~accommodated~~ addressed and the resilience of coastal communities will be increased by using ~~the~~ best practice coastal management options, including ~~some~~ one or a combination of the

Reference
Objectives
2.2, 2.4 & 2.9

following:

- a) dune management;
- b) inlet management;
- c) engineering measures;

Explanation

The Kāpiti Coast includes large sections of coast, including urban areas in Ōtaki, Te Horo, Peka Peka and Waikanae which have a natural dune system adjacent to the beach. However there are significant parts of the coast which are now armoured with coastal protection structures. A combination of management techniques will be required to retain and restore the natural shoreline functions to parts of the coast. In all areas the control of additional development in close proximity to the coast will ensure that natural shoreline movements can be accommodated. The coastal hazard management areas (which are mapped in the District Plan Natural Hazard Maps) are areas where development controls will be applied. In addition in rural areas, Peka Peka and Te Horo Residential Zones restrictive development setbacks are also applied to retain the natural character of the beach.

In the areas where dunes are present, these can be enhanced by restoration planting (see Policy 4.7 below). The inlets (stream and river mouths) are the most dynamic areas on the coast due to the interaction of river and coastal processes. In these areas mechanical excavation and river training works can be used to maintain a natural function. In the armoured sections of the coast, options are more limited, and removal of structures when they fail and managed retreat over time of buildings and infrastructure from these areas are likely to be the only ways to achieve a natural shoreline.

293. I recommend that Policy 4.7 and its explanation be amended as follows:

Policy 4.7 Natural dunes

Natural dune systems will be protected and enhanced, through restoration as a buffer for coastal hazard effects and natural dune function will be enabled to migrate inland in response to shoreline retreat where practicable.

Reference

Objectives
2.2, 2.4 &
2.9

Explanation

Natural dune systems which have native sand binding plants (spinifex and pingao) can assist in buffering against the shorter term effects of periodic storm related coastal erosion. These natural dune buffers can recover from this type of erosion and provide a robust buffer to development located behind the dunes. The depth of the dune system and the type of vegetation present is important to this role.

This policy should be read in conjunction with Policy 3.3 (Protection) and policies 7.4 (Rural Character), 9.5 (Protect Natural buffers) and 9.6 (Public Open Space).

3.10 Stream and River Maintenance

3.10.1 Matters Raised by Submitters

294. Submissions 55-F, 280-B, 340-I, 356-G, 358-L, 362-G, 394-J, 411-A, 430-D, 432-D, 479-D, 486-A, 545-D, 595-C, 600-H, 605-C, 619-H, 622-G, 646-D, 647-D, 653-B, 670-1, 699-C, 705-J, 756-J, 757-J and 772-F oppose Policy 4.6 and seek for it to be deleted all or in part.
295. Further submitter 229 Ken Moselen supports submitters 55, 280, 340, 356, 358, 362, 394, 411, 430, 432 and 653. Further submitter 128 Kotoku Park Ltd supports submissions 699 and 756. Further submitter 224 Jan Toohey support submission 772. Further submitter 241 Lowell Manning opposes submissions 280 and 411.
296. Submissions 150-6 Te Runanga o Toa Rangatira Inc and 568-A Ross Boyd support Policy 4.6.
297. Submission 232-A supports the policies contained in the PDP which protect dune and swamp land from infilling and sand mobilisation.
298. Submission 38 North Otaki Beach Residents Group states that non-management of the Waitohu Stream would mean greater risk for communities including access to properties and that the PDP fails to take into account the modified inlet/ shoreline behaviour, and seeks amendments to the explanation for Policy 4.6 to reflect this (38-J). Submitter 38 seeks that policy 4.6 acknowledges existing inlet management practices (38-G). Submitter 38 seeks that soft engineering and inlet management is recognised in the PDP (38-X).
299. Further submitters 113, 200, 227 and 230 oppose Submission 38 where it relates to Policy 4.6. Further submitter 128 opposes in part Submission 38 where it relates to Policy 4.6. Further submission 229 supports Submission 38 in its entirety.
300. Submission 205 supports Submission 38 and considers that current inlet management should continue (205-4).
301. Submission 202 Department of Conservation seeks that Policy 4.6 and its explanation is amended. Submission 202-3 seeks that the explanation is amended by replacing 'function' with 'looking shoreline'. Submission 202-2 seeks that policy 4.6 is amended as follows:
- Policy 4.6 – Natural Coastal processes**
Natural shoreline movement will be accommodated and the resilience of coastal communities will be increased by using ~~the~~ best practice coastal management options, including some a strategic approach involving one or a combination of the following...
302. Submission 229 Gordon and Sylvia Moller opposes those provisions in the PDP which do not permit the clearance of rivers and streams and notes that there are conflicting provisions with Chapters 3 and 9 relating to stream and river management

and any 'earthworks' required to undertake stream clearance activities. Submission 229 seeks that the clearing of rivers and streams, where that activity occurs by on or behalf of relevant authorities, should be a permitted activity (229-I).

303. Submission 429-1 Rangiora by the Sea Neighbourhood Group is concerned that the PDP does not acknowledge Greater Wellington Regional Councils on-going role in management of the Otaki River.
304. Submission 441-C seeks that the explanation in Policy 4.6 is amended to reinforce why natural shoreline movements is important.
305. Further submitter 241 Lowell Manning supports Submission 441 on Policy 4.6. Further submitters 29 Crozier Family Trust and Allin Family Trust, 113 Suzanne Chetwin, 128 Kotuku Park Ltd, 200 Christopher Ruthe, 227 Coastal Ratepayers United, 230 Heather Paul and Peter Jones and 239 Christopher Butler oppose Submission 441-C to amend Policy 4.6, while 20 other further submitters oppose Submission 441-C as they consider that the NZCPS and RMA have not been applied properly.
306. Submission 451 Rob Crozier and Joan Allin opposes:
 - All the provisions in the PDP to the extent that clearance of rivers and streams and other mitigation activities are not a permitted activity in the PDP (451-3); and
 - The overlapping of provisions and restrictions in Chapters 3, 4 and 9 regarding the maintenance, clearance and straightening of rivers and streams (451-R).
307. Submitters 205, 235, 582, 586, 590, 617, 618, 637, 638, 641, 688, 722, 761, 762 and 769 all support Submission 451 in their submissions.
308. Submission 589 Amuri Partnership considers that the PDP is largely silent on engineering measures and inlet management, which are identified in Policy 4.6 as management options (589-B).
309. Submission 602-1, 603-1 and 604-1 seeks that management of the Waitohu inlet continues.
310. Submission 711 Peter Katz seeks that KCDC provides information on the impacts of river and stream cutting undertaken upon Waikanae South Beach (711-C).
311. Submission 724 John Reardon, seeks clarification as the PDP implies that KCDC will not support management of the Waikanae River, when the Greater Wellington Regional Council has stated that it will manage the river, and therefore does not align with the regional plan (724-1).
312. Submission 738 Denis and Jan Toohey states that river mouth management is critical and seeks that it is to be provided for in the PDP (738-2).

3.10.2 Assessment

313. The submissions in relation to stream and river maintenance works at the coast can be divided into four matters:
- Deletion of Policy 4.6
 - Amendment of Policy 4.6
 - Enabling inlet/ river management and clearance and appropriate activities to enable this management
 - Overlap and conflicting provisions with other chapters in the PDP
314. Stream and river maintenance works at the coast are covered in the operative and proposed RPS.
315. Relevant objectives in the operative RPS include:
- Objective 7: *'The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.'*
 - Objective 19: *'The risks and consequences to people, communities, their businesses, property and infrastructure from natural hazards and climate change effects are reduced.'*
316. Relevant objectives in the proposed RPS include:
- Objective 7: *'The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of subdivision, use and development.'*
 - Objective 19: *'Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.'*
317. Policy 4.6 is the relevant policy for stream and river maintenance works at the coast as it provides for communities to use best management practice where appropriate – including (b) inlet management and (c) engineering measures.
318. I do not agree with those submissions that seek the deletion of Policy 4.6.
319. I agree that Policy 4.6 could benefit from some amendments to wording. I consider that proposed amendments from Submission 202-2 are appropriate.
320. The SEV version suggested that the explanation be deleted in its entirety, and the policy amended as below:
- Policy 4.6 – Natural coastal processes**
Natural shoreline movement will be ~~accommodated~~ addressed and the resilience of coastal communities will be increased by using the best practice coastal management options, including ~~some~~ one or a combination of the following as appropriate: ...

321. I agree with the amendments in the SEV version, however, do not think it is necessary to include 'as appropriate' because best practice is only applied as appropriate.
322. Many submissions (38, 229, 451, 235, 688, 722, 738 and 761) seek for more permitted activities related to stream and river maintenance and clearance. These maintenance activities (where the responsibility of KCDC and not GWRC) largely will be covered by earthworks rules. The proposed rules in the PDP provide for permitted activities related to earthworks, depending on the volume. Effectively, up to a specific volume, earthworks will be permitted activities provided they are outside areas of high natural character or areas of outstanding natural character. As such I consider that the proposed rule framework already provides sufficient framework to enable stream and river maintenance works in appropriate locations, and requires that these works obtain consent where they are located within areas of high natural character and areas of outstanding natural character.
323. Considering the above, I do not agree that the PDP is silent on engineering measures or inlet management as raised by Submission 589.
324. I do not consider that the PDP is removing the ability for stream and river training works to be undertaken, or that these works will not be able to continue under the proposed PDP, which was a concern raised by submissions (429, 602, 603, 604 and 724).

3.10.3 Recommendations

325. I recommend that Submissions 55-F, 280-B, 340-I, 356-G, 358-L, 362-G, 394-J, 411-A, 430-D, 432-D, 479-D, 486-A, 545-D, 595-C, 600-H, 605-C, 619-H, 622-G, 646-D, 647-D, 653-B, 670-1, 699-C, 705-J, 756-J, 757-J and 772-F are **rejected**.
326. I recommend that further submissions 128, 224 and 229 where they relate to submission 55-F, 280-B, 356-G, 358-L, 362-G, 394-J, 411-A, 430-D, 432-D, 653-B, 699-C, 756-J and 772-F are **rejected**.
327. I recommend that further submission 241 where it relates to submission 280-B and 411-A is **accepted**.
328. I recommend that Submissions 150-6 and 568-A are **accepted**.
329. I recommend that Submission 38-J is **rejected** as the explanations are being removed from the PDP.
330. I recommend that Submission 38-G and 38-X are **rejected** as it is considered that inlet management is provided for by policy 4.6.
331. I recommend that Submission 202-3 is **rejected**.

332. I recommend that Submission 202-2 is **accepted**.
333. I recommend that Submission 441-C is **rejected**.
334. I recommend that Submission 451-3 is **rejected**.
335. I consider that submission 38-X, 38-G, 229-I, 451-R, 235-A, 688-L, 722-C, 738-2 and 761-F should be **rejected**.
336. I recommend that Submission 589-B is **rejected**.

3.10.4 Recommended Amendments

337. I recommend that Policy 4.6 and its explanation be amended as follows:

Policy 4.6 – Natural coastal processes

Natural shoreline movement will be ~~accommodated~~ addressed and the resilience of coastal communities will be increased by using the best practice coastal management options, including ~~some one~~ or a combination of the following:

- d) dune management;**
- e) inlet management;**
- f) engineering measures;**

Reference

Objectives
2.2, 2.4 & 2.9

Explanation

~~The Kāpiti Coast includes large sections of coast, including urban areas in Ōtaki, Te Horo, Peka Peka and Waikanae which have a natural dune system adjacent to the beach. However there are significant parts of the coast which are now armoured with coastal protection structures. A combination of management techniques will be required to retain and restore the natural shoreline functions to parts of the coast. In all areas the control of additional development in close proximity to the coast will ensure that natural shoreline movements can be accommodated. The coastal hazard management areas (which are mapped in the District Plan Natural Hazard Maps) are areas where development controls will be applied. In addition in rural areas, Peka Peka and Te Horo Residential Zones restrictive development setbacks are also applied to retain the natural character of the beach.~~

~~In the areas where dunes are present, these can be enhanced by restoration planting (see Policy 4.7 below). The inlets (stream and river mouths) are the most dynamic areas on the coast due to the interaction of river and coastal processes. In these areas mechanical excavation and river training works can be used to maintain a natural function. In the armoured sections of the coast, options are more limited, and removal of structures when they fail and managed retreat over time of buildings and infrastructure from these areas are likely to be the only ways to achieve a natural shoreline.~~

3.11 Private Property Rights

3.11.1 Matters Raised by Submitters

338. A number of submitters raise concerns with restrictions on property use as a result of the provisions of the PDP. For example, Submission 101-A William Gasson opposes restrictive policies in Chapter 4 that compromise the ability to protect and maintain property. Submission 101-A is representative of a number of submissions which make the same point. Submission 190-B Ken Moselen requests that an additional objective is added to the PDP to explicitly permit owners of properties in the coastal environment to maintain, protect and develop their land if they take appropriate measures against the likely risks their land caused by coastal processes. Submission 280-C Bryce Wilkinson opposes policies in Chapter 4 on the basis that they fail to respect private property rights, and opposes all rules that categorise activities on a particular property as anything other than permitted. Submission 280 is representative of a number of submissions which make the same point. Submission 358-J Salima Padamsey opposes policies in Chapter 4 on the basis that they fail to respect private property rights, and that they put the amenity value of the landscape at risk by undermining landowners' ability to invest in order to preserve and enhance that value.
339. Submissions 451-C Joan Allin and Rob Crozier and 664-F Ian Sheen oppose any provisions that require property owners or occupiers in residential areas to rely on section 10 RMA existing use rights for residential activities (including houses and other buildings and structures).

3.11.2 Assessment

340. With the withdrawal of the coastal hazard provisions from Chapter 4 in 2014, the rules relating to the coastal environment now restrict activities only in areas of high natural character. I consider that this is an appropriate approach to take, and based on a review of the updated areas of high natural character outlined in Appendix 5, restrictions would only occur on relatively small areas of some private properties.
341. In the balance of the coastal environment I acknowledge the submitters' concerns about restrictions on activities. In my opinion the most appropriate way to address this is to clarify that activities in the coastal environment that are not in areas of outstanding natural character or in areas of high natural character should be subject to the underlying zone rules.

3.11.3 Recommendations

342. I recommend that Submissions 101-A William Gasson, 190-B Ken Moselen, 280-C Bryce Wilkinson, 358-J Salima Padamsey, 451-C Joan Allin and Rob Crozier, 664-F Ian Sheen and all similar submissions (as noted in section 5 of this report) are **accepted in part**.

3.11.4 Recommended Amendments

343. I recommend that the rules section of Chapter 4 Coastal Environment be amended by adding the following advice note:

Activities that are not in areas of outstanding natural character or areas of high natural character in the coastal environment are subject to the zone rules in other chapters of the District Plan.

344. I recommend that Rule 4A.4.1 be amended as follows:

Discretionary Activities	Assessment Criteria	Reference
1. All other Activities which do not comply with one or more of the permitted activity or controlled activity <u>or restricted discretionary activity</u> standards.	1. Consistency with the relevant Plan policies, including (but not limited to): a) Coastal Environment Policies 4.3, 4.4, 4.5, 4.6 and 4.7; b) Natural Environment Policies 3.2 , 3.7, 3.8, 3.10, 3.18 and 3.23; c) Hazards Policies 9.2 and 9.4.	Policies 3.2, 3.7, 3.8, 3.10, 3.18, 3.23, 4.3, 4.4, 4.5, 4.6, 4.7, 9.2 & 9.4

3.12 Coastal Yard Requirements

3.12.1 Matters Raised by Submitters

345. Submissions 205-D Margaret Bilsland, 451-S Joan Allin and Rob Crozier, 582-E Suzanne Chetwin, 586-D Frank and Catherine Wafer, 637-K Susan Baird, 638-K Patrick Murray, 641-K Barbara and Murray Scott and 769-D Denise Church and Michael Veneer seek the retention of the 7.5m coastal yard in the Te Horo Beach Residential Zone.

3.12.2 Assessment

346. Coastal yard requirements were the subject of discussion in section 3.6.8 of the Chapter 5 Living Environment section 42A report. That report includes a recommendation to reinstate the coastal yard provisions as requested by the submitters.

3.12.3 Recommendations

347. Recommendations in relation to this matter are outlined in section 3.6.8 of the Chapter 5 Living Environment section 42A report.

3.12.4 Recommended Amendments

348. No amendments to Chapter 4 Coastal Environment are recommended in relation to these submissions, but amendments have been recommended in section 3.6.8 of the Chapter 5 Living Environment section 42A report.

3.13 Conclusion on all topics in this chapter

In conclusion I consider that the submissions on this chapter should be accepted, accepted in part or rejected as set out in Section 4 below for the reasons set out in Sections 3.2-3.12 above. I recommend that provisions in Chapter 4 Coastal Environment be amended as set out in section 4 below for the reasons set out in Section 3.2-3.12 above.

I consider that the amended provisions will be efficient and effective in achieving the relevant objectives of this plan and other relevant statutory documents.

Section 4: Recommended Amendments to Chapter 4

Where I recommend changes in response to submissions, these are shown as:

- Text recommended to be added to the PDP is underlined.
- Text recommended to be deleted from the PDP is ~~struckthrough~~.

Section 5: Recommendations to Submissions and Further Submissions

**APPENDIX 1: KAPITI COAST DISTRICT COASTAL ENVIRONMENT
STUDY (OCTOBER 2012)**

**APPENDIX 2: KAPITI COAST DISTRICT COUNCIL PROPOSED
DISTRICT PLAN STAKEHOLDER ENGAGEMENT VERSION
COASTAL ENVIRONMENT BACKGROUND REPORT (JUNE 2015)**

**APPENDIX 3: KAPITI COAST DISTRICT COUNCIL PROPOSED
DISTRICT PLAN STAKEHOLDER ENGAGEMENT VERSION
NATURAL CHARACTER BACKGROUND REPORT (JUNE 2015)**

**APPENDIX 4: KAPITI COAST DISTRICT COUNCIL PROPOSED
DISTRICT PLAN LANDSCAPE AND COASTAL ENVIRONMENT
ADDENDUM (JUNE 2016)**

APPENDIX 5: UPDATED PLANNING MAPS FOR COASTAL ENVIRONMENT

**APPENDIX 6: OUTSTANDING NATURAL CHARACTER
ASSESSMENT RECORD SHEETS**