

BEFORE Kapiti Coast District Council

Under the Resource Management Act 1991

and

In the matter of Proposed Kapiti Coast District Plan
Chapter 4 – Coastal Environment

Date 26 July 2016

STATEMENT OF EVIDENCE BY CAROLINE WATSON ON BEHALF OF THE SUBMISSION MADE BY GREATER WELLINGTON REGIONAL COUNCIL

Introduction

My name is Caroline Watson. I am a policy advisor for Greater Wellington Regional Council. I have been employed by Greater Wellington Regional Council in this capacity since 2009.

I have a Bachelor of geography and environmental studies and a Masters of Environmental Studies from Victoria University, Wellington. I have processed resource consents, provided regional policy advice on notified resource consents and district plan changes, presented evidence at hearings and have resource management policy development experience.

1. Scope of evidence and Greater Wellington Regional Council's submission

- 1.1 The following evidence relates to submissions from Greater Wellington Regional Council (GWRC) made on 01 March and 02 April, 2013 on the Proposed Kapiti Coast District Plan (PDP).
- 1.2 GWRC's submission assessed the PDP for consistency with the then proposed but now operative Regional Policy Statement for the Wellington Region (2013) (the RPS). The assessment focussed on how the PDP fits within the regional policy framework for the management of the coastal environment and whether the framework has been adequately addressed through the PDP process.

- 1.3 The purpose of this evidence is to provide responses to the recommendations in the Officer's Report and to highlight outstanding areas of concern.
- 1.4 My evidence today will:
- (a) outline the policy and strategic context of this evidence,
 - (b) summarise GWRC's submission,
 - (c) respond to the Officer's Report recommendations on the matters covered in GWRC's submission, and
 - (d) request decisions on the PDP.

2. Policy and strategic context

- 2.1 The RPS is a regional document that identifies significant resource management issues within the region and sets out the objectives, policies, and methods to achieve the integrated management of natural and physical resources for the Wellington region.
- 2.2 The RPS sets out objectives and policies that provide local authorities with direction and guidance on resource management issues that must be given effect to when making changes to district and regional plans (in accordance with section 75 of the Resource Management Act 1991 (the RMA)) (policies 1-34). The RPS also provides direction on policies that must be considered as part of resource consent application (policies 35-60).
- 2.3 GWRC is particularly interested in how the PDP will support and contribute to achieving the integrated management of natural and physical resources in the Wellington region.

3. Summary of submission

- 3.1 GWRC made submissions largely in support of the provisions in Chapter 4 – Coastal Environment of the PDP, with minor amendments.

4. Response to the Officer's Report recommendations

4.1 Policy 4.1 – Identify coastal environment extent

- 4.1.1 GWRC supported KCDC for identifying, defining and showing on planning maps, the landward extent of the coastal environment. Identifying the coastal environment was consistent with both Policy 1 of the NZCPS and Policy 4 of the then Proposed Regional Policy Statement.
- 4.1.2 Our submission did not agree or disagree with the position of the line indicating the landward extent of the coastal environment.
- 4.1.3 The Officer's Report recommends substantially amending the location of the landward extent of the coastal environment to the immediate coastal edge or margin. Submitters' 485 (Frank and Vicki Boffa) submission point 6.7 has

largely provided the scope for amending the coastal environment line. Areas of coastal forest, some ecological and heritage areas, and dune sequences are now excluded from consideration of any coastal environment provisions.

Recent work on identifying the coastal environment extent and assessing natural character

- 4.1.4 I would like to address some recent work in the region on natural character in the coastal environment, which gives an interpretation of the coastal environment in relation to active coastal dominance and coastal significance.
- 4.1.5 In 2015/2016, Greater Wellington Regional Council, Hutt City Council and Wellington City Council jointly undertook an assessment of coastal natural character in their respective jurisdictions. A report was produced which identified levels of natural character in the coastal environment. As part of this assessment, the extent of the coastal environment for the Hutt City Council jurisdiction was determined by experts from Boffa Miskell and NIWA, as had been done previously for Wellington City Council. A ‘Zones of Significance framework’ was developed to determine the extent of the coastal environment as interpreted under Policy 1 of the NZCPS.
- 4.1.6 This framework identified 3 zones (see Appendix 1):
- Zone A (the Coastal Marine Area),
 - Zone B (the Coastal Significance Zone), and
 - Zone C (Coastal Context)

Together Zone A and Zone B make up the coastal environment.

- 4.1.7 Focussing on Zone B – this area is described as the Coastal Significance Zone which includes the active coastal interface (a slender portion of Zone B) where coastal processes are significant. It also generally includes land up to the summit of the first coastal ridge/crest or escarpment, and settled (or modified) dune lands, farm land, settlements and coastal forests.
- 4.1.8 It is clear in this recent local work that the coastal environment is not considered to be simply where natural coastal processes are significant or active, but also where coastal influences and qualities are significant (as described in NZCPS Policy 1(c)).
- 4.1.9 In my opinion, the redrawn coastal environment line in the PDP does not appropriately portray the full extent of the coastal environment. Instead, the redrawn line only covers an area where natural coastal processes are significant or active and not where coastal influences or qualities are significant. This is only a portion of what is termed ‘Zone B’ in Wellington City and Hutt City Coastal Natural Character Assessment, 2016 and is therefore not the full extent of the coastal environment as described in the NZCPS or RPS.

My analysis of Submission #485

- 4.1.10 Further, my reading of Submitter 485 submission point 6.7 is that they argue that, though a more confined definition and delineation is appropriate for restrictive planning and development controls, the wider coastal environment could be defined as the “entire coastal plain”. In this wider coastal environment there should be more “flexibility in planning and sustainable development is permitted and indeed encouraged” (p11 of submission 485). This aspect of their submission point has not been addressed in the S42A report.
- 4.1.11 I note that the ‘Landscape and coastal environment addendum’ states that “a map showing an alternative ‘Coastal Dominance’ CE line...was tabled by Frank Boffa” (p42). The submitter also stated in their submission that “it is a fact that a large area of the Kapiti Coast is indeed located within the wider context and influence of the coastal environment” (point 6.5 of submission 485).
- 4.1.12 It is my opinion that submission #485 was not simply seeking a coastal environment line as redrawn in the Appendix 5 maps. It appears to ask for a ‘two-tier’ management approach; a coastal dominance zone (with more restrictive planning controls including the identification of areas of high and outstanding natural character) and a wider coastal environment (the coastal plain with less restrictive planning controls) (see drawing and provision framework in Appendix 2).

RPS direction for the landward extent of the Coastal Environment

- 4.1.13 In terms of the RPS direction in Policy 4, there are four criteria provided when identifying the landward extent of the coastal environment.

Policy 4: Identifying the landward extent of the coastal environment – district plans

District plans shall include policies and/or rules to identify the landward extent of the coastal environment using the following criteria:

- (a) any area or landform dominated by coastal vegetation or habitat;
- (b) any landform affected by active coastal processes, excluding tsunamis;
- (c) any landscapes or features, including coastal escarpments, that contribute to the natural character, visual quality or amenity value of the coast; and
- (d) any site, structure, place or area of historic heritage value adjacent to, or connected with, the coastal marine area, which derives its heritage value from a coastal location.

- 4.1.14 It is my opinion that there are:
- Landscapes or features that do contribute to natural character, visual quality and amenity value of the Kapiti coast, and
 - Areas dominated by coastal vegetation or habitat, and

- Areas of historic heritage value,

4.1.15 which are all landward of the redrawn coastal environment line, that are unarguably a part of the coastal environment.

Landscapes and features

4.1.16 Examples of landscapes or features are the sequential dune features as described in the Isthmus report ‘Kapiti Coast District Landscape Study, 2012’. This report highlighted that “coastal processes have resulted in an extensive dune land sequence, and...comprise the predominant landforms of the lowland areas” (p5). It goes onto say that “although modified by development...the varying pattern or formations of dunes ...have established the underlying character of the lowland landscapes; even though they are at a considerable distance from the coast” (p11) and that “the lowland landscapes are characterised by larger parabolic dunes and remnant interdunal wetlands and lakes near the foreland...” (p11).

4.1.17 This report also describes the historical geomorphological development of the Kapiti district which would have been “an extensive network of lakes, lakelets and peat based swamps between the dunes” and that “coastal influences have also had a significant effect on the district’s climate...extending the effects of strong salt laden winds on vegetation patterns and microclimates at a considerable distance from the coast” (p5).

4.1.18 I note that the Officer’s Report on Chapter 7 – Rural Environment recommends amending Policy 7.14 in that subdivision, use and development be undertaken in a manner that protects valued landforms and ecological character including dunes and wetlands. While this goes some way towards addressing our concerns about recognising and protection landscapes and features across the coastal plain, these “valued landforms” are not specifically identified, so it is not clear which landforms this policy is aiming to protect. I also note that it is recommended to delete all policies, rules and standards in the PDP for dominant ridgelines and dominant dunes as well as the related maps.

4.1.19 **I request** that a broader coastal environment be defined to enable landscapes and features across the coastal plain of the Kapiti district, to be identified and protected for natural character values. A varying level of protection and conversely, activities enabled, in different coastal zones (see Appendix 2) could be applied. This approach would be more consistent with outcomes sought in RPS policies 3, 4, 35 and 36.

Coastal ecological sites

4.1.20 There are also coastal ecological areas in the Kapiti district that are no longer part of the coastal environment as defined on the Appendix 5 maps, when they meet criteria (a) of RPS Policy 4 (e.g. they are dominated by coastal vegetation or habitat). Examples of coastal ecological areas include many of the ecological sites listed in the PDP such as eco-sites K095 (Paraparaumu coastal

scarp) and K153 (Simon Brown Bush) both characterised as kohekohe coastal forest¹.

- 4.1.21 There are also several GWRC-managed Key Native Ecosystem (KNE) sites such as Haruatai/Pareomatangi (Te Hapua) and Nga Manu Wetland Complex, both of which are dominated by dune forests² (see Appendix 3).
- 4.1.22 While these sites may have protection in terms of being eco-sites in the PDP, these areas would not be able to be identified as having natural character values (which include values such as natural elements and natural processes), as these values can only be identified for areas in the coastal environment. Therefore, the management of effects of activities on the natural character values of these areas using direction provided in RPS Policy 35 and 36 cannot be achieved.
- 4.1.23 **I request** that coastal ecological areas immediately adjacent to the defined Coastal Environment line are reconsidered for inclusion within the coastal environment. This would enable the natural character values of these coastal ecological areas to be protected and achieve outcomes sought in RPS policies 3, 4, 35 and 36.

Coastal historic heritage

- 4.1.24 RPS Policy 4 also seeks that the landward extent of the coastal environment is identified using criteria related to areas with historic heritage values that are adjacent to, or connected with the coastal marine area, which derives its heritage value from a coastal location.
- 4.1.25 I am concerned that there are sites with historic heritage values such as archaeological sites (e.g. middens) identified by the New Zealand Archaeological Society (NZAA), that are closely connected with the coast, and are no longer considered to be in the coastal environment. These middens have been described in a report as “marking either a temporary resting place of groups of people, or occasionally locations of more permanent settlers” with some middens “entirely made up of tuatua, a coastal species”³.
- 4.1.26 The implications are that these areas would not be able to be identified as having natural character values (which include values such as surroundings and social values), as these values can only be identified for areas in the coastal environment. Therefore, the management of effects of activities on the natural

1 Wildlands Consultants. (2014) Assessment of Ecological Site Significance in the Kapiti District – Methodology. Contract Report No 3525p. Report prepared for Kapiti Coast District Council. DOC ID: BIOD-3-269

² See Singers, N.J.D., Rogers, G.M. (2014). A classification of New Zealand’s terrestrial ecosystems. Science for Conservation 325, Department of Conservation, <http://www.doc.govt.nz/Documents/science-and-technical/sfc325entire.pdf>, p. 53. Both KNE sites contain coastal ecosystems dominated by Tōtara, mataī, broadleaved forest, ecosystem unit WF6.

³ Mary O’Keeffe (1999) Heritage Solutions Wellington for Opus International Consultants titled “*Kapiti Urban Roading Project: Mid Waikanae Route Options- Archaeological Assessment*”³

character values of archaeological areas using direction provided in RPS Policy 35 and 36 cannot be achieved.

- 4.1.27 **I request** that the locations of these NZAA sites are not used to determine the extent of the coastal environment. Instead a broader coastal environment should be defined to enable the protection of the natural character values of these heritage areas. Such areas could be considered on a case-by-case basis in a consent process. This approach would be more consistent with outcomes sought in RPS policies 3, 4 and 36.

4.2 Policy 4.2 – Identify natural character

- 4.2.1 GWRC supported the intent of Policy 4.2 to identify natural character and noted that the matters for assessment were generally consistent with Policy 3 of the then Proposed RPS.
- 4.2.2 **I note** that the explanation of Policy 4.2 should be updated to refer to the operative RPS rather than the proposed RPS.
- 4.2.3 As the Officer’s Report recommends a reduced coastal environment extent, this also means that the protection of natural character and the management of effects on natural character will be only able to be considered in a reduced portion of the Kapiti district.
- 4.2.4 It is unclear whether a reduced coastal environment extent has resulted in fewer areas of outstanding and high natural character as the proposed district plan maps that were notified were incomplete. Also, it was difficult to determine from amended maps (Appendix 5) what the changes are to areas of high and outstanding natural character, as compared to what was notified.
- 4.2.5 I would have concerns if areas of high and outstanding natural character have been reduced in extent, especially if the area has no other classification (e.g. not an eco-site or outstanding natural feature) and therefore no policy framework to protect it from inappropriate subdivision, use and development.
- 4.2.6 Submitter #485 noted that they considered that natural character in the context of the NZCPS should be located in the more confined coastal environment (coastal dominance zone) and should not be included in inland areas. They go on to say that in the inland areas “natural character should be seen simply as a subset of landscape character” and should not be subject to more restrictive policies associated with RMA Section 6 and the NZCPS 2010.
- 4.2.7 It is my opinion that high and outstanding natural character could still be identified in the wider coastal environment, but provisions to protect it could be less restrictive as for those areas of high and outstanding natural character in the more confined coastal dominance zone.
- 4.2.8 **I request** that a broader coastal significance zone be identified with the ability to identify areas of high and outstanding natural character in this zone (see Appendix 2). A framework of provisions should also be developed to manage effects on these areas.

4.3 Policy 4.3 – Protection of natural character

- 4.3.1 GWRC supported Policy 4.3 and only wished to highlight a formatting error.
- 4.3.2 As directed by section 6 of the RMA, RPS policies 35 and 36 seek the preservation of, and the management of effects, on natural character (not just that which is outstanding or high). RPS Policy 35 seeks that when resource consents are being sought, that particular regard is given to preserving the natural character of the coastal environment, and provides a number of ways in which this could occur.
- 4.3.3 The Officer's Report recommends amending Policy 4.3 (now 4.5) so that it only refers to areas of outstanding and high natural character in the coastal environment.
- 4.3.4 It is my opinion that the recommend changes to Policy 4.3 (now 4.5) are not consistent with direction in the RPS, most specifically Policy 35 which seeks that particular regard is given to preserving the natural character of the coastal environment, not just that which is high or outstanding.
- 4.3.5 **I request** that the policy framework to protect natural character is revised to more appropriately protect natural character in the coastal environment as required by the RMA and RPS.
- 4.3.6 **I also note** that the explanation of Policy 4.3 (now Policy 4.5) should be updated to refer to the operative RPS rather than the proposed RPS.

New proposed policies for natural character

- 4.3.7 **I note** that the Officer's Report recommends including two new policies (4.3 and 4.4) related to natural character in the coastal environment.

Proposed Policy 4.3

- 4.3.8 Recommended Policy 4.3 is poorly drafted and does not address how Objective 2.4 – Coastal environment will be met. It merely describes how areas of outstanding natural character are different to areas of high natural character.
- 4.3.9 **I request** that Policy 4.3 be deleted and instead used as part of the explanation to Policy 4.2, as this policy has retained an explanation.

Proposed Policy 4.4

- 4.3.10 Recommended Policy 4.4 is basically a repeat of NZCPS Policy 13. It doesn't add any further direction on how to implement NZCPS Policy 13.
- 4.3.11 **I request** that Policy 4.4 is revised to provide more direction for plan users and consenting officers around how to manage effects of subdivision, use and development on natural character in the coastal environment. RPS Policy 36 provides some guidance on how this can be achieved.

4.4 Policy 4.4 – Restore natural character

4.4.1 GWRC supported Policy 4.4 as it was determined as being consistent with then proposed RPS.

4.4.2 **I support** the recommended changes to Policy 4.4 (now Policy 4.6) in the Officer’s Report and ask that they be included in the decision.

4.5 Policy 4.5 – Amenity and public access

4.5.1 GWRC supported the intent of Policy 4.5 but asked for some rewording for clarification.

4.5.2 **I note** that this submission point (441 – B) was accepted (see p45 of the Officer’s Report and p.37 of the table of recommendations to Chapter 4) but that the rewording has not been carried through into the recommended changes to Policy 4.5.

4.5.3 **I request** that the original rewording of Policy 4.5 sought in our submission is included in Policy 4.5 (now Policy 4.7) and that this amendment is accepted and included in the decision.

4.5.4 **I request** the following amendments to Policy 4.5:

Policy 4.5 – Amenity and public access

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

4.6 Policy 4.6 – Natural coastal processes

4.6.1 GWRC supported Policy 4.6 but sought changes to the explanation.

4.6.2 **I note** that explanations have now been removed from the policies in Chapter 4.

4.6.3 **I oppose** the recommended changes to Policy 4.6 (now 4.8) as shown in the Officer’s Report. Using the term “addressed” gives the impression that natural shoreline movement is a negative issue to be dealt with rather than a natural process that needs to be appropriately managed.

4.6.4 **I request** the following amendments to Policy 4.6:

Policy 4.6 – Natural coastal processes

~~addressed~~Natural shoreline movement will be accommodated where appropriate 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:*

- a) Dune management*
- b) Inlet management*
- c) Engineering measures*

4.7 Policy 4.7 – Natural dunes

- 4.7.1 GWRC supported Policy 4.7 but sought changes to the explanation.
- 4.7.2 **I note** that explanations have now been removed from the policies in Chapter 4.
- 4.7.3 **I support** the recommended changes to Policy 4.7 (now Policy 4.9) as they are consistent with policy direction in the NZCPS (Objective 5 and Policies 25 and 26) and RPS (Policy 51 (f)).
- 4.7.4 **I note** in the Officer’s Report (paragraph 268) that the officer did not agree with the removal of the words from Policy 4.7 “and enabled to migrate inland in response to shoreline retreat” and stated that Policy 4.7 “needs to recognise the natural processes which underpin and enable natural dunes”. However, the recommended amendment to Policy 4.7 shown in the Officer’s Report (p.56) shows the removal of these terms. I assume that this is an editing error.

5. Decisions requested

- 5.1.1 I request that KCDC notes GWRC’s support where it is given for the recommendations related to Chapter 4 – Coastal Environment.
- 5.1.2 I ask that the amendments and matters of clarification sought by GWRC as outlined in this evidence are accepted and included in the decision.

Caroline Watson

26 July 2016

6. Appendix 1

Zones of Significance

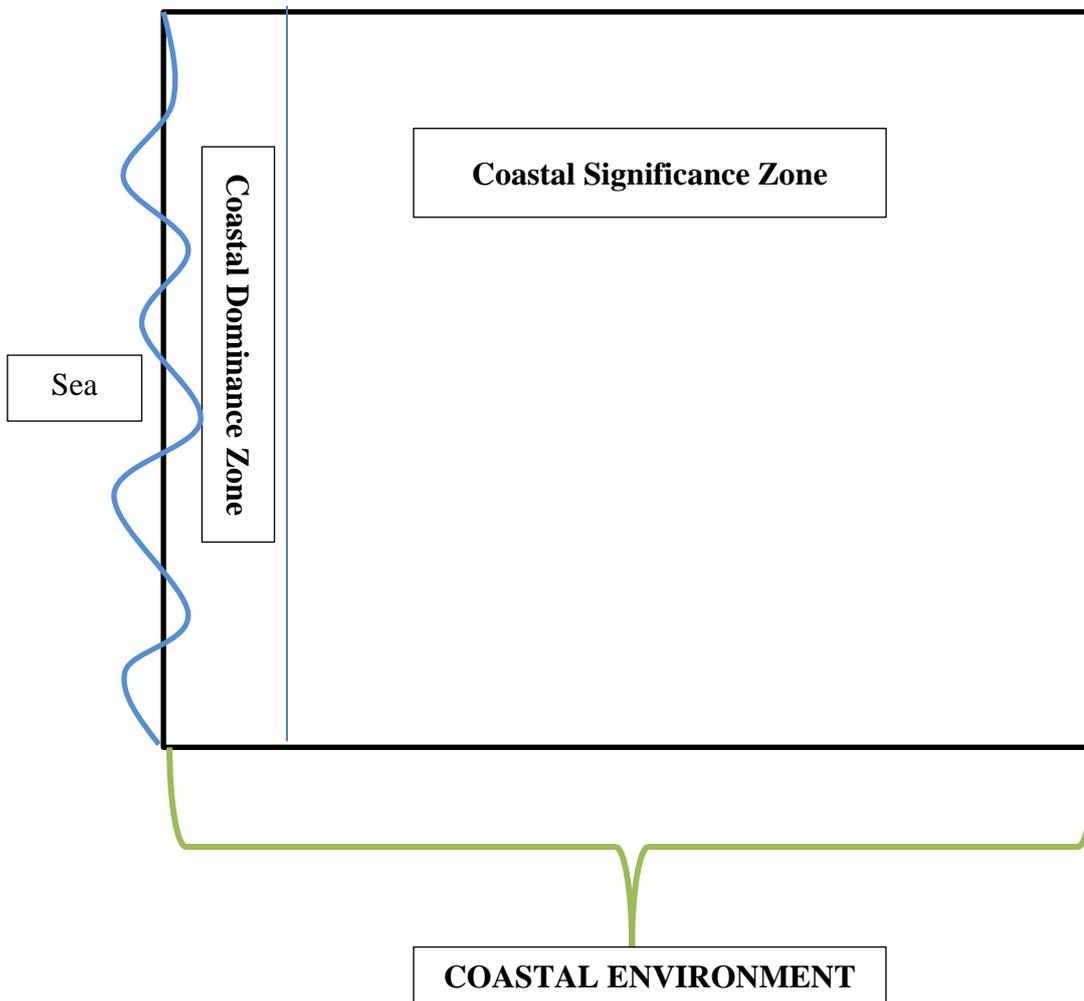
In combination with mapping the inland extent of the coastal environment, BML have developed the following Zones of Significance framework to apply to the coastline to determine the extent of the Coastal Environment, as interpreted under Policy 1 of the NZCPS. As illustrated in Table 1 below., the framework interprets the Coastal Environment to contain the following zones that, collectively, are called the Coastal Landscape:

- a. Zones A and B (the coastal marine area and the coastal significance zone), which make up the Coastal Environment, and
- b. Zone C, the Coastal Context.

TABLE 1: ZONES OF COASTAL SIGNIFICANCE	
	<p>Zone A</p> <p>This zone includes the Coastal Marine Area (CMA). Within the statutory context the CMA means the foreshore, seabed and coastal water and the air above the water to twelve nautical miles (or the territorial sea boundary). Inland, the CMA extends to the mean high water spring (MHWS). The CMA includes the rock, beach, coastal lagoons and lakes below MHWS. The CMA extends approximately 1km upstream of a river or a point that is calculated by multiplying the width of the river mouth by five.</p>
	<p>Zone B</p> <p>The Coastal Significance Zone includes the Active Coastal Interface (land above MHWS) and generally includes land up to the summit of the first coastal ridge/ crest or escarpment (with the width of this zone varying depending on the topographic environment). The Active Coastal Interface is generally a slender component of the Coastal Significance Zone where the sea is the dominant element and the primary or significant influence on landform, vegetation and perception. This zone is where coastal processes are significant and may include cliffs, settled (or modified) dune lands, farm land, settlements and coastal forests. For this project, this zone is also referred to as the Coastal Terrestrial Zone.</p>
	<p>Zone C</p> <p>Coastal Context. This area is where coastal elements, patterns and processes have an influencing presence on the coastal landscape and would include developed dune ridges which no longer exhibit significant coastal processes plus coastal plains, and hill-slopes. This zone generally extends inland from Zone B to where coastal influences are sufficiently diminished. It is also recognised that some activities occurring within this zone can significantly affect the coastal environment (Zones A and B), either experientially or physically, to varying degrees. The inland extent of Zone C will not be identified, as it falls outside of the Coastal Environment.</p>

7. Appendix 2

Redrawn Coastal Environment zones



District Plan provision framework

Zone			
Coastal Environment Zone	Over-arching objectives	Over-arching Policies	
Coastal Dominance Zone	Objective	Policies	Rules and standards
Coastal Significance Zone	Objectives	Policies	Rules and standards

8. Appendix 3

