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<tr>
<td>138205</td>
<td>Howard Simpson</td>
<td>COMMENT ON ALL DISCUSSION PAPERS</td>
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<td>1. Congratulations Kapiti Council for your bravery and wisdom in facing reality head on, and naming the major issues of peak oil and climate change!</td>
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<td>2. Yes, you are on the right track. We are impressed with the depth of the analysis which has gone into this document.</td>
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<td>3. You could add:</td>
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<td>• the promotion of NZ made technology which reinforces environmental goals outlined eg Pyroclassic wood burning fires (which run well on plantation pine, as well as having exceptionally low emissions).</td>
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<td>• Banning of 1080 and support for pest trapping projects.</td>
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<td>• Promotion of double rail to Otaki, and a station at Te Horo.</td>
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<td>• Consideration of greater use of appropriate recycled construction materials, and</td>
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<td>• emphasis on passive solar, extensive insulation, mandatory water tanks etc in local residential and commercial architecture (acknowledging that some of this is already in place).</td>
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<td>In recognition of the increasing demand on water supply, consideration given to storage in the hills, of high storm run off.</td>
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<td>For local power generation, a revitalisation of the 'Roaring Meg' Hydro scheme in the Otaki Gorge.</td>
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<td>138206</td>
<td>NZ Horse Recreation cl/ Vivien Dostine</td>
<td>COMMENT ON ALL DISCUSSION PAPERS</td>
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<td>1. Culture and heritage is not just about physical land or buildings but also about pastimes and recreation that provide links to our culture and heritage. The place of the horse in New Zealand's culture and history is important and can be 'remembered' through the continuation of horse recreation and sports, and access to rural areas where links to the land and agriculture are retained.</td>
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<td>The Global Issues and Pressures Discussion Document states that: &quot;Planning to minimise the need to travel by car to work, shop, go to school, and access medical and other community services is a key method of reducing the impact of peak oil for the community&quot;</td>
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<td>2. You could add:</td>
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<td>• emphasis on creating pathways/shared recreation trails across the region. There is mention of retaining access to beaches and rivers, and transport linkages, but providing access to areas for recreation is not included in the current document. Having to get into a car (or for horse riders, a truck) in order to travel to a recreation area is anathema.</td>
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<td>• Continually purchasing new areas for segregated sport and recreation is not feasible; there is finite land supply and limited funding. However, creating shared use and increasing linkages between existing areas expands opportunities for many types of recreation and also provides for local walking and cycling access to community facilities (provided that a wide-base of user types is allowed for in the first place).</td>
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<td>Ensure that subdivision includes provision to set aside bridleways/shared trails (non-motorised access) to ensure that communities and land use areas are linked. All subdivisions should be required to include public access easements for non-motorised traffic.</td>
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<td>A region wide plan to link recreation resources as well as historic-cultural areas is required.</td>
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<td>Recreation and transport planning should be integrated to ensure best use of resources, creating routes suitable for multiple purposes e.g. roadsides and verges are often made dangerous or unusable for walkers, the elderly, disabled and recreational users when vehicle only considerations are applied. However, roads may form part of a wider network of routes used for transport, community access and recreation. Economic benefits may be gained by creating more accessible communities - for a wide variety of recreationalists, through improved local access (not having to use cars for local trips) and for tourism.</td>
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<td>In terms of infrastructure design, it is important to note that stopbanks (infrastructure) do have the capacity to be topped up instead of designed and built for the worse case scenario.</td>
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<td>The direction of the proposed RPS is considered in this discussion document and it lists policy topics that the proposed RPS promotes including compact regional form, renewable energy and the avoidance of natural hazards.</td>
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<td>The challenges around the issue of growth in mobility of people and freight and its impact on land use, mode choice, social and environmental wellbeing are highlighted in the document. We note that an overall transport and land use objective should be to provide improved access and that this does not need to involve increased mobility. In many circumstances access to goods and services can be provided without the need to travel (eg. online information or services) or by more efficient means of travel (eg. one supermarket delivery van versus 10 car trips by households). Improved access can also be achieved through greater transport choice and through reduced reliance on the private vehicle.</td>
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<td>The opportunities and challenges of growth are well documented.</td>
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<td>We agree that some of the big transport challenges for Kapiti include significant congestion at peak times due to commuters travelling south to Porirua and Wellington, increasing volumes of freight on SH1, and planning for land use development and local connections in light of the proposed Kapiti Expressway.</td>
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<tr>
<td>138214</td>
<td>Greater Wellington Regional Council Attn: Caroline Ammundsen</td>
<td>COMMENT ON ALL DISCUSSION DOCUMENTS</td>
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<td>Greater Wellington Regional Council now wishes to provide an overall supportive submission of the seven Discussion Documents which discuss sustainability issues and options for the Kapiti Coast District Plan Review. Greater Wellington is interested in whether the discussion documents are consistent with the direction provided in the operative and more particularly the proposed Regional Policy Statements (RPS) and the Regional Land Transport Strategy.</td>
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<td>Greater Wellington is supportive of attempts by KCDC to tackle a large number of issues that are not only challenging for the Kapiti District but challenging for the rest of the world. It is important that these issues are seriously considered to enable the direction of the new district plan to be appropriate and realistic for the next 10 years.</td>
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<td>As populations rise and competition for natural resources increases it becomes ever more important that communities are resilient to changes in resource availability.</td>
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<td>#GLOBAL CHANGE: ISSUES AND PRESSURES</td>
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<td>Support KCDC in its endeavours to consider these important issues for the long term sustainable natural resource management of the Kapiti Coast.</td>
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Increasing local traffic is becoming more of an issue as Kapiti grows. Road safety on both local roads and the state highway is also an important consideration, and is influenced by growth.

Support development within a framework of consolidation, compactness and containment. In particular, we support targeted intensification within existing urban areas around public transport nodes and commercial centres including potentially at Waikanae. There may be more opportunities around Paraparaumu railway station, particularly if the existing SH1 can be ‘de-tuned’ once the Kapiti Expressway has been built.

Greater Wellington notes that on page 8 a statement is given that it should be ensured that all new development avoids natural hazard prone areas. This is inconsistent with ideas offered in the natural hazards and managed retreat discussion document which describes mitigation structures. It is important that a consistent message on development in areas at high risk from natural hazards is portrayed.

Greater Wellington also considers that avoiding or mitigating flood hazards should be considered as an important component of growth management in the Kapiti district.

In relation to any intensification of rural living in targeted locations, we agree that clustering of small lots to preserve natural features and soil productivity is a useful approach and that this will also contribute to infrastructure efficiencies.

This discussion document seeks limits to development where infrastructure is constrained or where natural hazards exist. This should also include the intensification of development in areas behind stopbanks.

Of the various new concepts proposed for inclusion in the District Plan to improve the way that ‘smart growth’ is implemented, the following ideas in particular are strongly supported:

- Increase the use of spatial planning and structure planning
- Integrate existing design guides into the District Plan where appropriate
- Improve and continue to target intensification around current and future transport nodes
- Replicate the urban edge approach in areas other than Waikanae North
- Respond to development pressures and opportunities created by the proposed Expressway
- Review the current District Plan road hierarchy for consistency with the network hierarchy in Council’s Sustainable Transport Strategy
- Review parking requirements

Consider the introduction of maximum parking standards for new higher density or mixed use developments close to nodes of public transport and local facilities. Support requirements for cycle parking being included in the District Plan.

- Prevent frustration of pedestrian and cycle connections

Supports increased promotion of travel planning and travel demand management initiatives as proposed. We would encourage KCDC to consider provisions in the District Plan that support discretion around the amount of car parking required for a development where a travel plan for that development is proposed.

The use of financial incentives as suggested is supported.

Agree that education and advocacy is important.

Also with strong links between infrastructure planning and the Council’s growth management vision is important for the Kapiti District Plan review.

Biodiversity

Greater Wellington is generally supportive of the stance on biodiversity. We also commend KCDC on their work to date in identifying and protecting biodiversity in the District, as it has achieved the most comprehensive planning response to biodiversity in the region.

However, some of the biodiversity protection requirements proposed in this discussion document may have a large impact on private landowners and may be impractical to implement if effective support and frameworks are not put in place.

We note that Policy 22 of the Proposed RPS sets criteria to be used to determine significance as a minimum measure for biodiversity/protection. We believe there needs to be further work to identify sites that have not yet been protected in the district plan, such as sand dunes and riparian vegetation.

Increasing the funding for biodiversity programmes with private landowners is supported, using existing initiatives such as rates relief, the heritage fund and the riparian fund. We believe that the current funds have delivered a great deal in recent years and much more could be achieved using incentives for landowners.

Greater Wellington supports the use of riparian margin setbacks including as access to managed watercourses, clustering of development and the concept of zoning to manage the effects of development and other activities on the biodiversity values that remain on the Kapiti Coast. However we note that it may be more cost effective to manage many of the threats to biodiversity at this scale organisationally (i.e. pest and weed control completed by council and funded via targeted rates) rather than requiring basic management standards of biodiversity site owners.

Greater Wellington supports the revision of the earthworks rules to further protect biodiversity values.
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Greater Wellington notes that the creation of a Transferable Development Rights (TDR) scheme may undermine voluntary initiatives such as covenanting if not appropriately managed and the resulting protection measures rigorously monitored. Elsewhere TDR’s have had some perverse outcomes due to failures in scheme design. We also note that accounting for multiple ecosystem services is relatively new in NZ and setting a regulatory framework to do this will be ground-breaking if a workable system is achieved.

**LANDSCAPE, CHARACTER AND HERITAGE**

Section 3 of this discussion document defines character, but appears to focus more specifically on urban character. Policy 3 of the proposed RPS states that district plans shall include policies, rules and/or methods to protect high natural character in the coastal environment from inappropriate subdivision, development and use. Therefore it would be helpful for the term ‘high natural character’ to be explained within this section.

When describing landscape values, it is helpful to break the values down into the three primary categories which are: biophysical (representativeness, ecosystem functioning), scenic (coherence, vividness) and association (shared and recognised and historical associations).

Cross boundary issues have not been identified as a landscape issue in the discussion document, however territorial and regional authorities across the country grapple with this. It is important to acknowledge that landscapes do not start and finish at district and regional boundaries. It is Greater Wellington’s understanding that there have been cross boundary landscape issues between the KCDC and Porirua City Council in the past and it is something that may have to be addressed moving forward with the district plan review.

Greater Wellington also notes a lack of identification and protection of both archaeological sites and features and sites of significance to iwi. Compared to historic buildings and structures, these two types of historic heritage are generally less well acknowledged and are noticeably omitted from district plan schedules.

To more effectively protect landscapes it would be beneficial to highlight the threats to them and have responsive protection. Threats may include plantation forestry, earthworks, roading and tracking, wind farms, subdivision, large scale infrastructure and vegetation clearance.

Policy 3 of the proposed RPS states that district plans shall include policies, rules and/or methods to protect areas of high natural character in the coastal environment from inappropriate subdivision, development and use. Although there is mention of protection of dune systems in previous sections, which may be a component of high natural character, it would be appropriate to explain here that identification and protection of areas of high natural character is important.

The proposed RPS includes policy 27 which seeks the management of significant amenity landscapes to maintain or enhance the values associated with them. This policy does not use the word ‘protect’ as it is outside of Section 6 matters in Part 2 of the RMA and are tied to Section 7(c) of the RMA. Greater Wellington agrees with the list of key landscape, character and heritage features to be identified, but would like to recommend that all significant historic heritage is identified including archaeological and sites of significance to iwi, that are not always wahi tapu sites.

It is important to note here that Greater Wellington is directed through the proposed RPS to undertake and complete the first phase of landscape assessment characterising the Wellington region’s entire landscape, including the Kapiti District. This landscape character description will then be available to KCDC to use when evaluating their ‘special’ landscapes. The timing of Greater Wellington undertaking this project will depend on when KCDC intends on undertaking the evaluation of their landscapes.

**NATURAL HAZARDS AND MANAGED RETREAT**

Greater Wellington supports the concept of the district plan specifying when protection systems are an appropriate way to manage the risk from natural hazards. It is important to realise that in some cases providing protection from natural hazards is not appropriate, and avoiding these areas in the first instance is preferable for long term sustainable management, However, when making such a decision, the implications for possible intensification of existing developed hazard areas must be considered.

Greater Wellington supports the avoidance of further development in high risk hazard areas as this is consistent with policy 28 of the proposed RPS. However, it is noted that residual risk has not been mentioned within this discussion document. It is important that future development in areas of residual risk from natural hazards is also thoroughly considered and direction offered on this in the new district plan.

We also support the use of two hazard zones as used by Environment Canterbury, to take account of a range of climate change and sea level rise scenarios.

Managed retreat and restoration is also encouraged as a way to build environmental resilience to natural hazards.

Greater Wellington supports the use of the precautionary approach to enable a more flexible approach to hazard management should changes in global climate and sea level rise occur more rapidly.

It is agreed that while flood defences provide protection from much of the flood hazard problem, this has lead to increased development in flood prone areas. These flood defences only provide protection to the design standard of the flood protection structure.

There is potential for over-design events which would put the community at greater risk. However, there is no mention in the discussion document of how to appropriately address this. We therefore suggest that the flood risk over the entire risk spectrum (past Q1 00 and towards probable maximum flow (Qpmf)) should be addressed to determine appropriate future development in the Kapiti district.

The discussion document raises the possibility of using rules in a regional coastal plan to prohibit the reconstruction of a dwelling that has been washed away or where the lot has been significantly eroded in a flood prone area. Greater Wellington considers that KCDC has the ability to go some way towards addressing this issue, and that this should be the subject of further discussions with Greater Wellington.
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<td>138217</td>
<td>Monique Lagan</td>
<td>Comment on all discussion documents: 1. Good to see peak oil identified as major issue for future. 3. There is very little mention or regard for partnerships with Maori across all of these reviews. I would like to see not just ‘consultation’ with iwi and hapu but collaboration and partnership with Maori as an important aspect of the District Plan Review.</td>
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<tr>
<td>138216</td>
<td>Adam Lawrence</td>
<td>Comment on all discussion documents: 1. The District Plan review must take account of the impacts of the Western Expressway. It is important to use the District Plan to manage the likely impacts of the expressway on social wellbeing and urban form and to ensure it does not detract from the natural qualities of the coast that we as a community value. 2. I have not had a chance to read the discussion documents in the time given, but want to be kept informed.</td>
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Greater Wellington does not agree with the suggestion of having setbacks from floodwaters for flood prone areas as mentioned on page 16. Avoiding development in areas of high risk from natural hazards and using appropriate floor levels is a much more appropriate way of managing the risk. Using the worst case scenario of 1.5m sea level rise does not have much value if it is not used in district plan hazard maps. Greater Wellington Flood Protection policy uses 0.5m of sea level rise in their models.

It is also important to prevent the intensification of development (e.g. infill housing) in hazard prone areas particularly those that are likely to worsen with climate change and not just when assessing new subdivisions. The discussion document includes the statement ‘make hazard mitigation across multiple properties easier’ as one of the barriers to remove to strengthen the current practice. Greater Wellington is uncertain as to what implications this could have for flood risk management.

Greater Wellington also has concerns about the suggested approach to increase flood modelling to take account of worse case flood hazards. We are unsure what exactly is meant by this, where the costs would lie and the implications. For example what would this mean for district plan map scenarios and setting floor levels above Q100 in flood prone areas?

In terms of infrastructure design, it is important to note that stopbanks (infrastructure) do have the capacity to be topped up instead of designed and built for the worse case scenario.

**FOOD AND RURAL PRODUCTIVITY**

Greater Wellington endorses the idea that the policy framework needs to be stronger and more explicit towards protecting soil quality and food-growing potential in the rural part of the district.

Greater Wellington notes the reference to the proposed RPS on soil quality in the region, and this is supported.

Greater Wellington agrees that the lot size should be reviewed to allow urban gardening on a range of lot sizes.

Greater Wellington recognises the opportunity to encourage “cluster” housing development to maximise the productive potential of the balance of the lot being subdivided. However, on high quality alluvial land, it is possible that the existing lot size rules should be maintained, if not increased, to protect the individual lot's productive capacity.

Community gardens are supported. These could be important in times of crisis, or other times when food production is low. Produce is seasonal, and it has a low carbon footprint compared to imported produce. The raising of poultry and bees are important additions to local gardening sustainability. Bees are disappearing from some locations for all sorts of reasons, and they provide the important step to pollination and future growth. Chickens as well provide necessary protein and manure for local gardens. However, both additions to the urban garden scene have to be carefully managed to prevent reverse sensitivity problems later on.

When land is subdivided and a reserve contribution given, the use of this reserve contribution for the food needs of new residents has some merit. In the past, reserve contributions have not been well utilised and have provided limited benefits to the overall local community. Having a focus such as a community garden may be embraced by a new community.

Farmers markets are another way to encourage community connections with displays of local produce. They can encourage the community to buy local produce and also help support local growers. The review should examine the use and location of farmers markets in the Kapiti district.

Overall, Greater Wellington welcomes and supports this discussion document on food production. KCDC is unique in examining these ideas and using them to best fit the natural attributes of the district - an ideal growing climate and high quality soils.

**INFRASTRUCTURE AND ESSENTIAL SYSTEMS**

Supportive of alternative development forms so that open space is retained and infrastructure efficiency enhanced. Promoting low impact approaches such as permeable surfaces, hydraulic neutrality and the revegetation of riparian corridors are also efforts that Greater Wellington wishes to encourage.

Encourage the consideration of climate change in design modeling work undertaken by developers or KCDC and use of the latest information when this is undertaken.

As well as requiring that new lots being developed have potential building floor levels of Q100, it is important that this is also a requirement of infill development in areas at risk from natural hazards.

Floor level controls should also be applied to residual overflow paths and ponding areas, and Greater Wellington supports the use of consent notices to ensure their ongoing compliance.
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| 138218  | Ōtaki-Kapiti Principal’s Association c/o Bruce McDonald | **COMMENT ON ALL DISCUSSION DOCUMENTS**  
I have attached a copy of the submission the Ōtaki-Kapiti Principal's Association (OKPA) made to the 'Choosing Futures' community outcomes strategic development in 2004.  
In looking through the KCDC District Plan Review Documentation I have concluded that the points the OKPA made in that original submission are still pertinent, especially in regard to social and community outcomes.  
As the Kapiti Coast continues to grow it is important that the KCDC gives consideration to education, schooling facilities and social health.  
The Ministry of Education continues to be less than proactive in its plans for the sensible provision of schooling facilities in Kapiti. I believe that the MOE has purchased land for a new school in Waikanae township when a school in the Waikanae Beach-Pekapeka area would probably be more useful as children from that area will continue to have to travel from Waikanae Beach past Kapanui School to attend Waikanae School. This is one example of the need for the KCDC to be more actively involved in working with the MOE on the provision of schooling in Kapiti. A number of schools in Kapiti are at or nearing their accommodation capacity at this time.  
Other main points in our original submission relate to planning around section size of new sub-divisions where the floor size of family houses exceeds the size of the sections upon which they are built. Children are growing up on sections that have no space on which to play. See our submission for more detail.  
The provision of social services and social and health service coordination is very good. This needs to be a priority as the area grows so that these services keep pace with need. The Kapiti Safer Community Trust is a fantastic organisation that needs good funding and continued support.  
It is important that KCDC arranges regular meetings with schools and school principals to get an on-the-ground feel for the social and community health issues impacting on children, families and education.  
Key points of the 2004 submission are as follows:  
Support KCDC intention to recognize the value of schools, acknowledge the impact of growth on schools, that KCDC see schools as key agencies for consultation on policies. |
| 138220  | Glyn Rowland | **COMMENT ON ALL DISCUSSION DOCUMENTS**  
1. There is no section on Community Safety and Crime. Currently the council is inadequate when dealing with community issues and concerns such as graffiti and anti social behaviour. I have been disappointed by their past response in this area. Wellington City Council have a dedicated team that deals with these issues effectively.  
The Local Government Act (2002) states that councils should work to deal with community priorities and concerns. The plan has not picked up on real community concerns and priorities.  
The plan requires a section on Crime and Community Safety. It is important that our community feel safe.  
2. No the issues are not summarised well  
3. Community Safety and Crime- Issues have been missed. These issues such as graffiti may appear minor however they have a major effect on community safety and attracting tourists into the area. |
| 138221  | Simon and Debbie Bunt | **COMMENT ON ALL DISCUSSION DOCUMENTS**  
All summarised correctly, and Yes on the right track |
| 138269  | Landlink Ltd | **COMMENT ON ALL DISCUSSION DOCUMENTS**  
Landlink is concerned that the vision for the District has not been defined sufficiently (if at all) and that the over-arching development strategy has not been settled.  
This is shown clearly by the fact that the WLR/Expressway road strategy is not yet finalised (not necessarily Councils fault) We believe it would be premature to set rules where the form of development is not understood nor the growth vision sufficiently consulted on  
The 2006 Development Management Strategy is significantly out of date- in light of the proposed expressway as this has a great impact on the manner in which development could or should occur. The Ngarara Farm)is not likely to be built in the manner originally expected (because the area is bisected by an expressway) therefore a revision of growth plans is essential before the Council can get ‘down to detail’ with writing rules.  
It appears that more detail on some elements is necessary form an opinion about the nature of the impact of implied changes to the District Plan.  
Generally speaking the elements being considered encompass all the important elements for the District,  
We encourage Council to ensure that the links between the elements are properly addressed.  
**GLOBAL ISSUES**  
1 Generally issues summarised correctly.  
2 Generally on the right track  
3 While the Coast is in a generally low lying zone and the potential impacts of climate change are particularly important, estimates of sea level rise beyond 1.2 metres are illogical. A calm sense of reality about the risks of sea level rise and the impacts on the District must no be clouded by ill-informed hype but based on sound peer-reviewed research.  
**URBAN FORM AND TRANSPORT**  
Generally, issues summarised correctly. |
The Council's suggested 'smart growth' approach is supported and is aligned with the WNDZ concept. The 'form based' codes which have been used in the WNDZ are a planning mechanism which yields the outcomes which the KCDC seem to be suggesting is appropriate. The WNDZ has a regulatory plan and building form standards which typically are the basis of form based codes.

We therefore suggest that the concept of form based codes be explored for the whole District. The non-regulatory design guides therefore remain as guidance only. The first step in this process must be character analysis to ensure that the communities (each of them) are comfortable with the character which is being retained or enhanced.

The KCDC will be familiar with the fact that the Ministry for the Environment are undertaking a review of the RMA and in particular are considering urban design and infrastructure reforms to reinforce good urban design practices. We are very skeptical that banks will be proactive in the area of an affordability index that may be a mechanism to lower mortgages (page 19). The Council should consider rates relief as more proactive approach to lowering district wide costs.

We are concerned that economic development does not appear to be sufficiently elevated to be considered alongside environmental and social elements of what some call the 'three pillars of sustainability'. Without economic growth, the District cannot maintain its services, enhance its environment and have a well balanced community.

Economic development seeks to increase the community’s standard of living, and the economic, political and social well-being of its people.

3 The Development Management Strategy of 2006 is clearly out of date and in need of review given the NZTA decision on the Western Link Road, changing water resourcing options, rail transport enhancements, developer-led plan changes (Paraparaumu Airport, WNDZ, Ngarara) and so on. This should be completed before ‘micro-management’ by way of the RMA and District Plan Review can be properly considered.

**BIODIVERSITY**

Generally issues summarised correctly.

Generally, on the right track. The Open Space Strategy document should be released for comment immediately and in parallel with this District Plan Review.

3 What have we missed?
The comments look to have covered all of the currently envisaged issues.

**LANDSCAPE CHARACTER AND HERITAGE**

1. Generally, issues summarised correctly.

2. We consider that the form based codes as used in the WNDZ (see Urban Design and Transport above) attend to concerns about the heritage feature and character protection. Character assessments in various zones needs to be completed and consulted on as a first step in this process.

3 The comments look to have covered all of the currently envisaged issues.

**NATURAL HAZARDS AND MANAGED RETREAT**

1 Generally, issues summarised correctly.

2 Generally on the right track. It is vital that for well informed decision making, estimates of sea level rise must not be clouded by ill-informed hype but based on sound peer-reviewed internationally recognised research.

3 The comments look to have covered all of the currently envisaged issues.

**FOOD & RURAL PRODUCTIVITY**

1 Generally, yes.

2 Generally, issues summarised correctly.

3 Landlink will continue to evaluate this aspect.

**INFRASTRUCTURE AND ESSENTIAL SERVICES**

1 Generally, issues summarised correctly.

2 We support the review of the SDPR and the inclusion of the NSZ4404:2010. We recommend that the elements of infrastructure that are examined be broadened to include consideration to the location, size, type and future makeup of:
   - Schools,
   - Medical facilities (private and public),
   - Water infrastructure,
   - Sewerage infrastructure,
   - Open spaces,
   - Alternative and conventional energy,
   - Airports and related infrastructure.
COMMENT ON ALL DISCUSSION DOCUMENTS

We (our group of companies) own eight properties (predominantly land) in Kapiti, have a contract to purchase one other and maintain active interest in many more. We are committed to long term sustainable development and believe that we have the interest and thinking to make a significant contribution to this District Plan Review. Our view of Kapiti is that it has huge potential to produce exemplary land development models whilst continuing to need significant repair to its existing building stock, infrastructure and focus. The best indicator of Council performance is sustainable growth in the rating base (obviously not necessarily based on population growth) and this is derived from several areas - enhanced productive value, enhanced recreational value, waste minimisation, long term planning, energy and water efficiency and security, attractive and efficient transport etc etc. Many of these are touched on in our responses to your questions below.

1. Are we on the right track? Yes and No. Global epidemics of serious disease will occur, the attractiveness of our food growing capacity will one day expose the weakness of our defence ability, population will be the biggest influence (and this will largely be controlled by Central Government), loss of young people and lack of social diversity is threatening and etc etc. The key issue here is whether the issues discussed are those over which we can operate efficient and beneficial foresight.

2. Some very good ideas - however often accompanied by potentially negative side effects. "Protect productive potential (for local food growing)" - absolutely fine as long as this is done in collaboration with "enhancing recreational values". The most obvious criticism of subdivision practice within Kapiti is that it produces far too many life style sections that are far too big to enjoy at the expense of productive capacity. It is perfectly possible to achieve both outcomes simultaneously. "Set energy efficiency budgets for developments" - absolutely acceptable but not the answer to the very poor performance of existing buildings. Kapiti must lift its performance as a whole and not entertain the mischievous dream that simply by legislating new developments alone the future will be secure. "Consider using ecological footprint or carrying capacity as an assessment tool for development" - absolutely marvellous but why not also as a tool for incentives? Why not consider rating incentives for conversions of current stock? The key to achieving the outcomes implied is not to stop development - rather to incentivise development that raises the standard and thereby increase the attractiveness and value of Kapiti.

3. How does this review achieve the objective of meeting the best interests of Kapiti long term, will it efficiently induce good behaviour and significantly raise the performance of the District in relation to future possible change? It could do significantly better by acknowledging that the goals of social, cultural and environmental well-being are clearly catered for, but not the plank that underpins the success of all these - economic well-being (unless we want to grow food!).

Knowledge economy and business.

We also recommend that the three elements of urban form (the built environment), infrastructure (roads etc) and open space (the public realm) be considered together rather than as separate elements. To treat them in relative isolation (as has been done with these discussion documents) creates the potential for disjointed outcomes and misaligned priorities. Riparian margin extensions should be limited to those areas where streams are greater than 3 metres in width. Consideration must be given to margins where other forms of treatment are appropriate - in particular the margin around the edge of the WNDZ and the large pond are to be landscaped in other ways rather than planting.

3 The comments look to have covered all of the currently envisaged issues.
COMMENT ON ALL DISCUSSION DOCUMENTS

It is acknowledged that Council has provided comprehensive discussion documents on the following seven topics, for the purposes of this consultation / submission process:

We thank and commend Council for providing such thoughtful and robust information.

As each of the seven topics are so interconnected and interdependent, we have elected to provide a summary of key points for Council's consideration.

We acknowledge the huge shift in thinking over the past 10-15 years from the current to the revised District Plan, in particular with regard to global change issues—especially in terms of mitigating against the worst effects of climate change, peak oil and the need for sustainable transport infrastructure and responding to a changing population structure and building diverse, strong communities, resilient to change.

Some of the documents make mention of the need for economic sustainability or well-being.

Some parts of the documents hint at a Districtwide Strategy, but then reading through them all they take in the desire to allow very little growth/development, and making much of adverse effects of any change.

However, there appears to be nothing within the District Plan supporting economic development, any strategy or focus which will lead us to having the economic resiliency required.

Without a focus on economic development and growth for the district, there will be no jobs for our youth (or anyone for that matter), nothing to help with our rates take to assist with long term infrastructure needs, which will then lead to little funding for the social, environmental and cultural well-being of our communities.

Transport has a huge focus on trying to get people to use public transport, cycle or walk. There is no supporting research that shows how we make this change and manage to maintain our lifestyles, given:

- Public transport, cycles and walking limits what can be carried
- Both KCDC and WRC emphasis in public transport, but the bus timetables have been reduced making this a less desirable option
- With the advent of train services from Waikanae, the intention is to run Waikanae bus services to station only. However, many people (particularly elderly) will not welcome having to get on/off bus, on/off train and repeat for return journey. A "shoppers bus" during the day (limited times) may have to be investigated.

Much is made of adverse effects throughout the documents. There are adverse effects to everything - even us living on this planet! We should also be looking at the positive effects or opportunities and investigating how to best mitigate the adverse effects.

RSRA asks that Council consider the following suggestions and actions:

- RSRA strongly supports investment in a multi-faceted, efficient public transport system to encourage passenger and freight business onto bus and rail. We applaud the current double-tracking rail investment and urge Council to support its expansion to Palmerston North and to continue to lobby for a Raumati Railway Station.
- That Council lobbies central government against the construction of big motorways through the district that will divide our communities, schools, and reduce safety, increase pollution and encourage goods and people onto roads instead of more sustainable options such as rail, bus, cycle and pedestrian ways. Motorways are yesterday's thinking, an outdated model.
- That Council work with Greater Wellington Regional Council (GWRC) and central government to invest in improvements to the current roading system in Kapiti and increase the cycle, bridal and walkway networks that connect communities in the district in a sustainable way. This would include the reinstatement of the Western Link Road over the proposed expressway/motorway.
- We applaud the hugely successful coastal revetment project on The Esplanade, Raumati South and ask that it be expanded to Raumati Beach Pool complex / carpark to help mitigate against the worse effects of erosion and rising seas whilst providing an alternative cycle, bridal and walkway route.
- That Council be proactive in reducing household and business waste to landfill by actively educating the population about the need / benefits of recycling and reusing resources and by providing incentives (eg rates rebates) for the installation of water tanks, grey water systems, micro-energy systems etc.
- A We applaud the current investment in The Water Project that is building a long term sustainable water supply and storage system for the Kapiti Coast and believe it needs to be supported by investment in water tanks, grey water systems etc for businesses and homes.
- It is obvious that Council must carefully manage the population and business development pressures on the existing and future infrastructure limitations including affordability. It is vital that Council prioritises investment in developing diverse transport and connectivity systems, water and energy infrastructure whilst finding the balance between encouraging population and business growth for the district. People move to the Kapiti Coast, and indeed to Raumati South, attracted to the low density housing, "higgledy-piggledy" streets, beautiful and wild natural environment and unspoiled natural skyline views, the quite and colourful character of our small communities. This must be preserved and enhanced. Flat earth development methods must be rejected (eg future roading and housing developments, the pending Raumati South Village enhancement project).
- That Council actively protects and preserves the green / wild spaces in the district. In Raumati South this includes the stands of regenerating kanuka along the Western Link designation and the wild spaces of the Raumati Escarpment and QEII Park. We ask that Council support the fencing off (where appropriate) and restoration of valleys, wetlands and waterways in the district to encourage biodiversity, clean and bio-productive waterways.
And companies Name Ltd. Duncan Projects Trust Ltd and Riverbank Estate Itd, 31B33 Technology Park LandMatters Ltd , Clean SMP Properties Enterprises Ltd, Pritchard including organisa

growth of carbon sinks and eco-tourist interest. RSRA supports the need for Council to protect and preserve the unique heritage of the district from damage or disrespect in relation to urban and infrastructure development. This includes ensuring protection of waahi tapu sites in any proposed roading designation (eg Western Link or the proposed expressway / motorway).

That Council encourages people to grow their own food through public education and making incentives for sustainable practices such as composting and using rain / grey water sources for gardening etc. This includes support for community gardens and the very positive fruit and nut trees on berms initiative that was introduced during the previous political term.

That Council supports local markets and reduces bureaucratic barriers that have begun to encroach and therefore discourage innovation, diversity and creativity in our communities. Local markets create character, a sense of community and reduce carbon miles on goods and services.

It is suggested that all of the above points provide the opportunity to encourage the growth of a district that is not burdened with characterless, excessive development and big box chain-stores, but will rather grow a multi-faceted, community and reduce carbon miles on goods and services.

From a general perspective the Discussion Documents have achieved their purpose - discussion. It is suggested that all of the above points provide the opportunity to encourage the growth of a district that is not burdened with characterless, excessive development and big box chain-stores, but will rather grow a multi-faceted, community and reduce carbon miles on goods and services.

It is suggested that all of the above points provide the opportunity to encourage the growth of a district that is not burdened with characterless, excessive development and big box chain-stores, but will rather grow a multi-faceted, community and reduce carbon miles on goods and services.

The Discussion Documents seem to suggest moving towards a position where Kapiti is 'ring fenced' so it can survive on its own and without the need to deal with the 'outside' world. This in turn should encourage the resident population and culture within local Kapiti communities to embrace diversity and diversification and therefore be more resilient to environmental and economic pressures and changes and have the strength to be responsive to opportunities.

We fully appreciate the global trends such as climate change, peak oil and food supply shortages. However these issues need to be considered and weighted relative to their importance for the districts population of 48,000 people and Kapiti's position in a Regional and National economy.

We need a Vision Plan, a real plan that can work to meet the goals of tomorrows and create Smart growth.

The KCDC District Plan Review if we continue with the present form/structure, the district will stagnate and growth will be stalled/standstill with no -or little employment for our people and the youth of tomorrow.

LIUDD -the impact of the structure is now demonstrating what we have- NO GROWTH, this is very hard to implement and uneconomical to develop in its present form ie. Do the residents wish to live on a 300-350sqm lot and have a community garden? This is not why folks are coming to Kapiti - its for life style and climate that’s our market. Small lots, we estimate only 2-3% of people may prefer the LIUDD type of development ,hence council is giving the people the wrong message to the balance 97%. LIUDD is not the answer, we need more of a mix, shape and form, at present this is impeding our growth and employment.

Biodiversity Forestry-" Permanent Forest Sink Initiative" this being alternative to harvesting and replanting, does Council wish to purchase the forests on the coast? We are taking away people's rights, forestry is a plan over a long term goal 27-30 years, not a 5-10 year plan. Productivity and employment will be lost. The district needs to be value adding to the raw timber - Kapiti could create other industries.

Food and Rural Productivity- Reserve contributions for food producing reserves? Clustering of Rural dwellings with Buffer zones? Commercial opportunities to export out of the district and globally, We need to be very careful to tackle this area with shape and form and present for future.

Urban form and Transport- Create growth and particularly with a New Expressway and Double tracking rail to Waikanae will create new direction, and growth if we allow it to develop and happen. The Expressway- yes it will have effects on our environment. On a positive note it will create change for the future and a natural growth as close proximity to Wellington. From this vision we can plan the change/directions again the impact will have increase demands on our district.

Council wants to achieve “its vision and have local food” This is a no or low employment opportunity. Remember commercialization this is the hub of survivals. We are not Waitakere City or other large cities. Kapiti is a narrow coastal corridor with 5 settlements, we are Kapiti , we need vision and employment to shape and form and create employment for our people.

Needs - Overall visionary plan & framework - that is transparent with common goals so that all parties can create the big picture plan for our district.

Where is the projected growth tables in Population if any? .We look forward to engaging with Council -on informal /workshop style constructive discussions to assist in developing a vision of growth so Business will move into Kapiti and we cater for the next decades of growth.

Town Centre plans- there is no mention in the D P review- this needs addressing.

Our district has major infrastructure priorities which must be adhered to prior to many other wish lists.

The Pillars of Commercial and economic development are required - and need addressing to assist with Shape and form of the district.

From a general perspective the Discussion Documents have achieved their purpose - discussion.

We fully appreciate the global trends such as climate change, peak oil and food supply shortages. However these issues need to be considered and weighted relative to their importance for the districts population of 48,000 people and Kapiti's position in a Regional and National economy.

The Discussion Documents seem to suggest moving towards a position where Kapiti is 'ring fenced' so it can survive on its own and without the need to deal with the 'outside' world. This is leading the Review to new concepts involving ecological footprint calculations, carrying capacity assessments, energy budgets and protecting productive capacity for local food growing. These concepts are worthy of investigating through design guides and encouragement, but in our view should not largely drive the District Plan because they are global in nature and striving for subsistence ignores market interactions with the regional and international economies.
### SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

The Biodiversity paper looks at ecosystem issues from a national perspective and explains the loss in some values in the New Zealand context. Against the National trend it explains that in the Kapiti Coast District protection has increased through covenant and other means, and that biodiversity values have improved (the Kereru is used as an example). It also explains that insufficient monitoring means Council is unsure how these improvements are occurring. Forestry, farming and subdivision are seen as putting pressure on biodiversity, which may not be the case.

The Document uses examples of Waitakere City as a best practice model for a basis for introducing concepts of stronger regulation around Riparian activities and Natural Area Zoning. Council must understand that one of the main economic triggers for protection and enhancement of areas through covenants, pest management and new plantings is occupation. New regulation creates a barrier to the continued increase in biodiversity through these activities and we suggest that education and resourcing guidance is a more productive way to work with land owners.

The Kapiti Coast is lucky in that it has natural ‘pulling power’ to attract people to live here. This we believe is a result of climate, the lifestyle, and the range of choice of living environments. For new growth the Discussion Document suggests Council should be looking towards a consolidation policy through ‘infill’ (including medium/high density) development in and around town centres.

The use of examples like Portland and Oregon in the papers is not relevant to the Kapiti example and need to be put in context. Portland for example has a metropolitan population of 2.1 million, of which just over 500,000 live in Portland City, a fully functioning port, and an integrated transport network with light rail, trams, and intense public transport network funded by the wider Metro area.

Jade Gardens in the Waterstone development is an example of the limited demand for medium density housing. Two stages in Jade Gardens filled the entire historical and present demand for medium density living with subsequent stages being abandoned in favour of greenfield development (involving physically pulling brand new infrastructure out of the ground). In fact there has been very few, if any, successful medium - high density projects of an economic scale in the Kapiti area. However, provision should be made for such consolidation, but there must be opportunities in the greenfield category to meet the existing demand in the interim 10 - 20 years.

Consolidation and centres based policy direction also has implications for business growth. For example a policy overlay such as the Tourist Precinct, whilst having good intentions to promote Tourism, needs to be reviewed to allow a wide range of commercial activities as it has proven to be restrictive in its current form. Providing a range of business opportunities can assist keeping youth in the District.

Within the Urban Form and Transport Documents new concepts are being framed using recent examples in Horowhenua. That 'Domain' type of planning is a complicated means by which to address form and landscape issues particularly when the District can be simplified into the Hill Country, the Coast, the Plains in between and pockets of highly productive but broken contoured soils.

We would encourage the Council to plan for the implications of the Roads of National Significance and be ready to embrace any opportunities rather than simply responding to them.

We look forward to engaging with Council, perhaps informally through a workshop style discussion, to extract where the Council sees the District progressing - i.e. helping to develop a Vision so that the Plan Review can be shaped around it rather than responding to it.

Important questions for you to ask your officials will be:

- The Council accepts that growth should occur, what are the reasons people and business move to the Kapiti Coast, i.e. what are the economic drivers for people coming to the District; With those reasons in mind, what are the most appropriate ways to enable that growth?
- If the Council provides limited choice through consolidation what will the real economic costs be to the District, and how will the demand be catered for in the interim years (10 - 20 years)?
- What influence the Roads of National Significance will play in increasing the demand to live in Kapiti?

We believe these questions will assist the Council ‘Pointing the Ship’ before developing new provisions for the District Plan Review. The positive framework around which the Review should be based would include the following:

- Accepting that the District will have population and business growth, and to cater for the demand for a range of living/business types, investigate those areas that can appropriately absorb growth because of: Broken topography and contour;
- Can effectively integrate built form in the landscape through design and landscape controls; but Maintain the rural character and amenity of open space, particularly the steep hill country and through “quality soils” definitions.
- Move away from the prohibitive concepts like ‘urban fences’ in favour of managed responses to living environments and biodiversity improvements; and provide for a range of employment opportunities on land that is already available for instant uptake - Nikau Tourist Precinct for example.

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<td>138425</td>
<td>Cuttriss Consultants Ltd</td>
<td>Generally we support the overall planning and urban design principles contained within the discussion documents. We fully support the need for development within the District to follow such principles and to create a high standard of living. We believe that most of the issues that affect the District have been identified and addressed to some extent. However we do not consider that Council has indicated clearly enough at this stage of the process within any of the discussion papers how: Growth throughout the District will be practically catered for and in such a way that it will provide some variety and choice; The character and amenity values of communities within the District will be identified and reflected within the provisions of the District Plan;</td>
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The District Plan provisions will ensure commercial and industrial growth and how employment opportunities will be enhanced. The fact that the discussion documents are virtually silent on commercial and industrial growth is very concerning.

The use of public transport within the District will be enhanced.

The District Plan will address the need to confirm the layout of the Paraparaumu Town Centre and also those other town centres within the District that can enhance Kapiti as a place to live and work and also as a destination for visitors.

Of great concern is that an overall vision for the growth and development of Kapiti to provide a great place to live, work and visit has not been outlined.

**URBAN FORM AND TRANSPORT**

We fully support the need to prevent urban sprawl onto rural land surrounding existing townships that has high landscape value or productive potential and the need to encourage the containment of urban development through the use of appropriate controls. However, at this stage of the review process we would have expected character assessment of the individual townships within the District to have been undertaken and that information utilised to outline how the planning and urban design principles expounded within the discussion documents would be practically applied.

In our view Plan Change 77 (Otaki Residential Review) is an example where planning provisions have been applied without adequate analysis of:

- the overall character of the Otaki residential areas e.g., allotment size is only one attribute that contributes to the character of an urban environment;
- the effect natural hazards will have on development within the 'Nodes' that have been identified;
- the effect isolated higher density development within the 'Nodes' identified will have on the public transport systems serving Otaki and Otaki Beach;
- an assessment of the views gained through community consultation that is targeted to gain the views of a broad range of people that live within the community.

The objective of slowing or halting growth within the Kapiti District is intimated within this and other discussion documents. The new District Plan will have a life, from when initially publicly notified, of approximately 15 years. Statistics New Zealand predicts that between 2011 and 2026 the population within the Kapiti District will rise by approximately 7,900. At an average household size of 2.32 people this will equate to the need to provide for an additional 3,405 households over this 15 year period.

We do not believe that it is appropriate to develop a District Plan that does not identify and cater for this predicted growth over this period of time. We believe that appropriate controls that result in the application of urban design principles for all residential development can allow for higher density development within the 'Nodes' identified, along public transport routes and within other areas where it will be of a density and character that is appropriate.

The promotion of Plan Change 77 (Otaki Residential Review) appears to have occurred after insufficient assessment of all the attributes that have formed the character of Otaki and not having analysed the concern expressed by some members of the community in relation to perceived higher density development occurring within the township. Conceivably this concern resulted from the development of former market gardens within the residential zone at standard density. This would have markedly changed the character whether the density averaged 600 m², 650 m² or 700 m² as some of these gardens were a number of hectares in size.

Further consultation and discussion should then take place in regard to the structure plans as part of the District Plan review process.

**BIODIVERSITY**

We support the protection of those areas and features of the District that make up the biodiversity of Kapiti. Ongoing assessment and analysis should be undertaken to ensure the District Plan provisions are appropriate to achieve this. Our only concern with respect to this is that the provisions formulated within this review allow for the sensible development of existing vacant allotments.

**LANDSCAPE, CHARACTER AND HERITAGE**

We fully support the comprehensive assessment of the landscape, character and heritage attributes that make Kapiti a desirable place to live and visit and also contribute to its character.

The outcome of those assessments should be utilised to develop justifiable and robust District Plan provisions that protect those features of importance that are identified.

The promotion of Plan Change 77 (Otaki Residential Review) appears to have occurred after insufficient assessment of all the attributes that have formed the character of Otaki and not having analysed the concern expressed by some members of the community in relation to perceived higher density development occurring within the township. Conceivably this concern resulted from the development of former market gardens within the residential zone at standard density. This would have markedly changed the character whether the density averaged 600 m², 650 m² or 700 m² as some of these gardens were a number of hectares in size.

**NATURAL HAZARDS & MANAGED RETREAT**

As with coastal hazards the identification of other natural hazards that will affect people and land within the community should be identified and addressed through appropriate and robustly developed District Plan provisions. The identification of areas where higher density residential development may be appropriate should avoid such areas as this not only introduces an inappropriate hazard but results in development costs associated with having to
COMMENT ON ALL DISCUSSION DOCUMENTS

1. Some issues have been summarised well from a fresh viewpoint while others seem to be a copied outdated paragraph of words.

2. Most of the ideas are good but there is a lack of clear staged action plans to counteract a lot of the expected negative changes our future community faces.

Addressing peak oil, climate change, sea level rise, coastal erosion, maintaining natural character, developing renewable resources and adopting sustainable practices are only good ideas if they are accompanied by workable solutions that will create employment, improve the local economy, improve lifestyle and social well being of residents, enhance community life and improve our natural environment in practical tangible ways.

3. The proposed 4 lane highway cannot be placed in the proposed location due to the expected rise in sea levels. This aspect of the consequences of sea level rise needs to be factored in and concrete solutions written into the district plan. Saying the government of the day forced this solution upon us is not a workable longterm option.

Higher priority on creating more Rail and public transport and local grown food plus food grown in community gardens as a response to peak oil. Also how can council encourage alternative fuel, vehicle use in this district.

Improving the Town Centre needs to be a listed conclusion on pg20 of urban form.

Exploration how the district can develop rules to minimise the effects of electromagnetic frequency from cell towers and all other installations.

Work with the community to find sustainable options for managing sea level rise and coastal erosion.

Expand the concept of provide for sustainable working landscapes.

GLOBAL CHANGE: ISSUES AND PRESSURES

We agree that global environmental change is central to the concept of sustainable planning, and as such this is integral to the Resource Management Act and all plans that arise from it, including of course the District Plan. The emphasis of the Plan is of course local, and so must consider these impacts first and foremost at the local level.

The District Plan review provides an opportunity to become an exemplar framework to influence other plans well beyond the district boundaries, nationally and, perhaps, internationally. But plan making is a democratic process, and many different ideas on the District's future will of course emerge. It can only be to the long term benefit of the entire community if the District Plan as it emerges from this review provides a truly sustainable planning framework. From reading the breadth and depth of the topics covered, the indications are that such an outcome may well come forward.

URBAN FORM AND TRANSPORT

The need to curtail urban sprawl has become almost a basic principle of sustainable planning. We support the emphasis on this in the discussion documents. Settlement boundaries offer a tried and tested approach to setting a limit on sprawl. The Urban Form and Transport paper cites examples of many large and medium sized cities where various approaches have been tried, but smaller towns within commuting distance of larger cities also offer some...
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- good examples of approaches in sustainable planning. We would welcome the opportunity to discuss this in more detail with Council officers involved in this review, and perhaps (and if appropriate) with elected members. In particular, planning without zoning is an established principle not only in car-oriented Houston, but also up and down the United Kingdom where much of the land within urban areas is subject to zoning as such. Some uses are relatively restricted, with 'employment areas' being the equivalent of industrial or business zones, but within undesignated land there are frequently opportunities for a greater variety of urban development than is often present within a rules based system (noting however that "designation" has a different meaning from that used in the Resource Management Act). Such development includes many different forms of medium and higher density development, some of which is inevitably more successful than others. There are other successful approaches from many other countries of other development approaches at relatively small scales, which could be appropriate for Kapiti.

- The challenges brought by the severance effects of the Kapiti Expressway could be turned to positive effect in defining areas where higher density development would be most appropriate. For example the Paraparaumu Town Centre. It appears those areas within the District's towns that will be inland of the expressway route could offer the better opportunities for medium and higher density development, and this could be linked to possibilities for more affordable housing.

- The paper mentions the proportions of land within urban areas that are typically devoted to car and other road transport use. This is we believe often accentuated by the subdivision of residential properties on the individual property basis, with the resulting long driveways to rear sections taking up increasing proportions of urban and suburban land. There is scope for other arrangements that would be more efficient in this respect, and again this is an issue we hope to touch on in a further submission.

- We agree that transport networks within the District should move towards less reliance on owning a car. Cycle ways could plan a great part in this. Bridges across the expressway for pedestrian, cyclist and perhaps equestrian use could lessen the severance caused by the expressway. Including cycle and pedestrian priority streets within the network could also assist.

- Provision of more rural-residential accommodation is unlikely to be justified in sustainability terms in its current form, and appears to be largely market driven. Living in rural-residential locations generates additional fossil fuel consumption as compared to more urban locations that are closer to services, largely through greater reliance on private transport but also through other factors. There could however be an opportunity for a somewhat more radical approach to any rezoning land for rural-residential use, for example by requiring a robust demonstration that on-site low-carbon energy generation and / or carbon capture would be sufficient to off-set this greater environmental impact.

- For example, provision of electric vehicle charging points coupled with low carbon on-site renewable energy generation could turn the usual situation of rural-residential's relatively greater greenhouse gas emissions on its head, potentially resulting in net positive outcomes in this respect.

**BIODIVERSITY**

- Carrying on from the comments above on landscape, any provision that can be made within the District Plan for planting of key native tree species, preferably from locally sourced seed, is to be encouraged. Some native tree species, such as nikau and kohekohe, are key to local distinctiveness yet are frequently absent in new development proposals, while planting of some forest tree species such as rata have other conservation implications due to the impact of introduced animals on these species and consequent scarcity of healthy examples.

**LANDSCAPE, CHARACTER AND HERITAGE**

- We generally support the approaches suggested here. Rural settlement in New Zealand often leads to extensive non-native planting, and there are examples such as the land to the north of Waikanae, to the east of SH1, where the effects of this on local landscape are of debatable quality. Opportunities to reinforce high quality landscapes are to be encouraged.

- The locational context of NZHPT classified and District Plan listed heritage buildings contributes much of their overall value, and this needs to be protected by retaining as much of their curtilage as possible and ensuring that the design of buildings nearby respect these settings. Moving such buildings inevitably results in the loss of their context, so that their historic value is almost more in the nature of an artifact than a distinctive place. Moving such buildings should generally be viewed as unacceptable, and the loss of NZHPT or local heritage statues should be considered for any such proposals.

**NATURAL HAZARDS AND MANAGED RETREAT**

- Concentrating the bulk of new residential development within towns to the east of the proposed expressway could also provide for a lesser level of development between the expressway and the coast. In conjunction with our comments on the Urban Form paper, we are of the view that a more sensitive approach could be taken to subdivision in this area that would tie into the ideas expressed in the Natural Hazards paper on managing retreat in the face of sea level rise.

- Generally, most development on flood plains should be avoided, and development should be steered towards the areas of least risk. This is of course also true of areas in proximity to earthquake fault lines, and such areas would most appropriately be added to the green network wherever possible.

**FOOD AND RURAL PRODUCTIVITY**

- We made submissions regarding protection of the most productive soils to the Regional Policy Statement review, and believe that a robust approach to this issue is fully justified.

- Provision of farm worker accommodation in rural areas is likely to be better justified in sustainability terms than rural-residential subdivision. Ways of ensuring that such accommodation remains affordable for those working in the rural sector that are typically on lower than average incomes needs to be explored, and incorporated into the Plan.

- Some points within this paper are aspirational; for example, it is difficult to see how coppice forestry would sit within the rules based system of land use controls. However, it could be incorporated as one of the likely requirements, or at least as part of the "tool-kit", in designing truly sustainable rural-residential development.
KCHG supports approaches that improve, increase or strengthen:

- The retention of the Kapiti Health Centre land for health purposes for the Kapiti community
- The percentage of medicines prescribed that have been produced locally
- The establishment of a local currency
- The percentage of trade carried out in local currency
- The proportion of the community employed locally
- The range percentage of essential goods manufactured locally
- The number of businesses owned by local people
- The percentage of local building materials used in new housing developments
- The value of air, water and soils over economic gains
- The ability of individual households and neighbourhoods to provide all the resources and skills needed to live
- Self-sufficiency at the household level, including rainwater storage, micro generation renewable energy systems, growing fruit and vegetables, growing medicinal plants and gaining first aid skills
- Support and cooperation within neighbourhoods and communities and build social capital
- Opportunities for the trade and exchange of home made, used or unwanted items to promote self-sufficient communities

Comment on all discussion documents

KCHG supports approaches that improve, increase or strengthen:

- Local energy supply by enabling the development of renewable energy systems at multiple scales
- Flexibility around renewable energy systems which fall outside of normal height plane and distance-to-boundary rules
- House hold energy efficiency
- Sustainable housing forms and flexibility of residential yard requirements to allow greater flexibility of house design
- Passive solar heating and cooling of new buildings and developments
- Sustainable forestry for an ongoing supply of solid wood fuel for domestic heating
- Subsidies and/or financial incentives for energy saving or energy producing technologies
- The reduction, re-use and re-cycling of rubbish and other waste materials including the 'Zerowaste strategy'

Food Resilience

KCHG supports approaches that improve, increase or strengthen:

- Limit urban sprawl to protect productive soils and biodiversity and increase the potential for local rural-based employment
- The shaping of urban form by sustainable agriculture and food production
- The preservation of soil health
- Policy relating to the protection of soil quality and food growing potential in rural areas
- Policy relating to the range of lot sizes that would allow urban gardening
- Food production in the rural zone
- The range and percentage of food produced locally
- The planting of agricultural crops and trees more suited to warmer temperatures and drier, or more variable soil conditions
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<td>• Food growing in urban areas including on public land, land zoned Open Space, private or nonprofit land as community gardens</td>
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<td>• The management of rivers, beach/ocean and public land and their eco-systems to maximise biodiversity and opportunities for local hunting, fishing and foraging</td>
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<td>• Efficient water use</td>
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<td>• Water quality and allocation</td>
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<td>• Subsidies and/or financial incentives for household rain water storage tanks and grey water systems</td>
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<td>• The establishment of farmers markets and street fairs to maximise opportunities for a local food economy</td>
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<td>• The trade, exchange and/or sale of home made, home grown and home raised food, animals and animal (by) products to maximise opportunities for a local food economy</td>
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<td>• Education in schools and in the community around food growing and self sufficiency skills</td>
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<td>• Reduction of food waste</td>
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<td>• The opportunity to keep of bees and poultry in urban areas</td>
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<td>• The ability for reserves contributions to be spent on acquiring land for community gardens, food forests and other food producing reserves</td>
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<td>• The planting of fruit and nut trees and community gardens on Council reserves</td>
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<td>• The planting requirements for road verges or reserves in new subdivisions to include fruit and nut trees</td>
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<td>• Rules to provide for food forests</td>
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<td>• The use of rooftop gardens</td>
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<td>Transport Resilience</td>
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<td></td>
<td>KCHG supports approaches that improve, increase or strengthen:</td>
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<td>• Walking and Cycling</td>
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<td>• Carpooling</td>
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<td>• The use and efficiency of and the linkages that support public transport</td>
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<td>• Sustainable land use patterns and forms of development that reduce the need to travel by car and reduces the amount of traffic on local roads and parking demand</td>
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<td>• Consolidation: intensive residential development around neighbourhood and town centres, corridors and current and future transport nodes</td>
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<td>• Residential centres as focus points for work, school, shops, medical and other community services including public transport systems and cycle parking</td>
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<td>• The reduction of car parks in the Paraparaumu town centre to create a pedestrian only zone with green spaces where the community can gather including public shopper buses travelling to and from park &amp; ride areas outside of this area</td>
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<td>• Access to critical routes to and from key community centres</td>
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<td>• Local connectivity and useful pedestrian and cycle connections</td>
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<td>• The development of travel plans by organisations that include promoting walking cycling, public transport, flexible working hours and working from home arrangements</td>
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<td>• Travel management assessment as part of major development projects to ensure that walking, public transport and cycling opportunities are maximised</td>
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<td>• Allow mixed housing options including minor household units and group housing</td>
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<td>• Financial incentives for location-efficient development, carbon accounting and carbon reduction</td>
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<td>• Development that supports the Council's growth management vision</td>
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<td>• Bicycle and pedestrian safe urban streets and thoroughfares between Kapiti communities</td>
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**COMMENT ON ALL DISCUSSION DOCUMENTS**

1. Importance of consultation with local iwi/Maori authorities needs to be prioritised.
2. Waahi tapu and other sites of significance to Maori should be considered whenever there is plan for growth and development, prevention should be prioritised rather than action taken when developers 'stumble' upon a significant site.
3. In terms of growth - I don’t see any plan for KCDC to take responsibility for rubbish and recycling which is created by their residents - there should be plans to manage this within the district, not rely on neighbouring/other district councils to take it away - this is short-sighted and unfair on the recipient residents.
4. Water tanks should be compulsory for all new establishments - residential and commercial, and council should look at encouraging/supporting installation of tanks in existing areas, especially in the Raumati/Parem/Waikanae area where water shortage is a huge concern to residents - do not rely on Otaki water being piped - It will never happen! Council need to seriously consider all applications for consent for pools/spas and other water consuming additions, realistically where is the water supply going to come from??
5. Encourage and consider subsidising increased use of solar technology
6. Increased use of the railways to reduce the number of heavy trucks/vehicles on the roads – we are fortunate to have a good rail system running through the middle of our region and it should be used far more than it is, including extension of electrification.
7. Improved shade and access to clean drinking water at children's play-grounds would be useful (e.g. Otaki Beach park). Otaki Railway and Haruatai parks are well shaded by trees in some places, but drinking fountains/water supply would be great.

On a positive note: Generally Otaki has good variety and accessible parks which are well maintained.
Jan Nisbet

**SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS**

Building heights - Paekakariki - maintain a building height of no more than 2 storey's for buildings.

Sustainability KCDC has some leading strategic plans involving sustainability and they need to be strongly adhered to.

As the sun is one of the good free ways of heating I think there needs to be some measures put in place whereby neighbours can ask for trees to be trimmed if they start casting shade on other peoples houses.

Some restrictions on tree heights or stopping certain types of trees from being planted in sections as well as reserves as they soon become problem trees eg macracarpas.

Hamlet developments -and road widths - these are better than lots of small plots of land and they need to have roads leading to them that are safe for walking alongside and cycling along. Otherwise we get places like Te Hapua & Peka Peka Rds which have no shoulder for riding or cycling or walking and with the increase in subdivisions are now too narrow to be safe.

I strongly recommend that there are buffer zones - green areas that separate towns etc - this gives people a definable area which they belong to and stops the urban sprawl .. I support strong district plan provisions to enhance and maintain biodiversity.

There needs to be controls put on mono crops especially ones such as pine trees that have an adverse affect on peoples health such as in the spring with the pine tree pollen.

We need to be sure we don't cover all our productive land with houses - ie we need to keep food growing areas.

There needs to be really strong provisions for buffer zones between waterways and dairying and forestry harvesting operations in particular and other activities that contribute to degradation of waterways.

In the biodiversity paper the keeping of hens is mentioned. I think we need to be careful about increasing the numbers you can keep and the distance they need to be away from houses as they do have a tendency to increase flies.

- I support the direction of the Urban form and transport paper and agree with the suggestion to integrate existing design guidelines into the district plan

I think acting on the Concepts on page 20 will help maintain some of the good aspects of living in this district.

Landscape etc document
I support the direction of this discussion - we need to do all we can to continue and further the good work about maintaining these aspects especially the few iconic landscapes we have left

Dr Rochelle Wilson

**SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS**

I appreciate and concur with what has been written by KCDC under the headings Global Change; Biodiversity; Natural Hazards and Managed retreat; Food and Rural Productivity, Landscape, Character and Heritage; Urban Form and Transport; Infrastructure and Essential Systems.

However, what the KCDC "can" do is likely to be far from what is done or agreed on.

The problems of certain Climate Change [and most likely at least the worst case scenario you put forward], population growth and altered demographic towards increased elderly proportion are too serious to pussyfoot around. Not to be courageous in your decision making would show your statements to be just "greenwash".

At the Minimum I would want to see:

Re Global Change:
- any refurbishment, new car fleet to be sourced locally and/or using best sustainable or low Carbon emission products
- No support for electricity wastage like the competition for "best" Christmas light displays, unless they are Solar.
- No support for motor vehicle events including "burnouts"

Biodiversity
- No more building consents for housing on the ridge or on the west aspect of the escarpment
- protection and support for Q E Park. not to be cut up, for road projects at its north end, but encouragement for restoration of dune and swampland
- support for Whareora Farm estate
- support for the various environment groups like the various "Friends" and Nga Uruora

Food and Rural Productivity
- Requirement for new housing to have Solar water heating whenever the aspect allows [so input into roof design also]
- requirement for water capture/storage/grey water systems for new subdivisions wherever possible [density considerations]
- not giving consent for any more estate-like subdivisions on productive rural land
- support for transition town initiatives like communal food gardens
- support for "Farmers' Markets" without new silly restrictions re food products

Landscape, Character and Heritage
- That the dunes and ridge landscapes and native forest areas [pathetically small that they are] are enhanced not degraded [and see comments above]
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| 138448 Barbara Mountier | **1. GLOBAL CHANGE**
   a) It is excellent that the KCD Council has a Climate Change and Energy Advisor. I would like to see a much higher profile for his work and a much stronger link between his office and the communities in our district. Schools, both primary and secondary, and tertiary institutions should all have access to the information and advice that is available. Also all community groups, such as Rotary, Jaycees, Lions, Probus etc should have access to talks/sessions/lectures by the Climate Change advisor as part of their monthly programmes. All such organisations look for interesting speakers for their programmes each year.
   b) The expected rise in petrol prices means that the Council, on behalf of the District, will need to formally support the development and maintenance of rail services, especially TransMetro, and to oppose any attempt by governments to sell them off. NZ Rail has been very deliberately run down during the last two decades and should not be expected to make a profit in the short run. Possibly, given the expected increase in patronage when the train services are reliable, and petrol is more costly, rail may begin to show some profit, but until that time, public transport needs to be subsidised in order to provide a first world service.

   This is a common practice in other countries.

| 1. GLOBAL CHANGE | **2. URBAN FORM AND TRANSPORT**
   a) Transport is now a central issue because of the imposition of the Motorway plan on the Kapiti District. A motorway will not assist in making it easy to get from home to work, schools, shops and services or to the railway stations. A motorway will affect every man, woman and child wishing to cross the district from east to west or the reverse. Further, a motorway will cut right across any hopes for a continuance of good urban form, design and development.
   b) Consideration of transport in the Kapiti District must include the Council participating in the promotion of efficient, reliable rail services. See 1 b)

| **3. BIODIVERSITY**

   This leads on from Landscape and Character. "Pressures from settlement have resulted in a reduction of our precious natural environment to the point that . . ." only 3% of the wetlands in the Kapiti District remain. The Council's own maps will show where wetlands have stood in the past. Wetlands were an important source of biodiversity because they were a breeding ground for varied species of insects, fish and birds and constituted significant ecosystems in their own right.

   The District Plan needs to be constructed in such a way that "the local regulatory framework for land use, guiding what can or cannot be done . . ." cannot be subverted by the constant pressure of developers. The consents process need to rest on a clear conservation policy that is set out publicly and owned by the District and all its communities.

   Commissioners at consent hearings need to be trained in the implications of the Council's sustainability policy and should be expected to give priority to the conservation of the Kapiti District before the commercial interests of developers.

| **4. LANDSCAPE, CHARACTER AND HERITAGE**

   I strongly support the preservation of the character of the Kapiti District and the five small towns. There is a unique landscape and a unique history. So I agree strongly that the District Plan needs to identify, protect and enhance landscape, character and heritage values in the district.

   The Council's policy is to protect natural land forms. This seems to have been more in theory than in practice. Sand dunes were removed in the Kotuku subdivision and in the Raumati Estate development. In the latter, the original wetland has been destroyed by earthworks, regressing and draining. Artificial lakes receive the drained water. Everything in the subdivision has been man-made. I hope the Council will re-examine its policy and refrain in future from allowing the destruction of natural land forms.

| **5. NATURAL HAZARDS AND MANAGED RETREAT**

   a) The Council needs to establish a high level response to known hazard risks and be alert to identify further, as yet unknown risks. As we have seen in the leaky homes saga, District and City Councils hold unavoidable responsibility in matters where they hold the power of consent and the obligation of supervision of and insistence on proper standards.

   An obvious case is the identifying of flood plains or frequently flooding areas and their clear Marking on district maps. It is unethical to allow housing development on such land. Also, in the Wellington region it is necessary to maintain building codes and standards for buildings, both residential and commercial, that will enable them to withstand significant earthquakes.

   The Christchurch earthquake has alerted us to this necessity. I do not think that community growth pressures should be allowed to lower building standards, nor should it be used as an excuse to destroy natural features such as dunes and wetlands. I wish to see the Council develop a considered policy, publicly stated, of these matters and not driven by pressures from developers.

   A related issue is the proposal to build a new motorway on Kapiti's subsoils of sand and peat.

   The Raumati stretch of SH1 is still not top quality because of the subsoil, and in the past it has been actually corrugated for this reason. Why should we expect a new motorway to be different? It is the Council's responsibility to...
### SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

1. **We have not been given enough time to prepare submissions:** my notice of advice was only received (with my rates demand) at the end of October/November. Can we have the time for submissions extended please? I ask that the review time be extended (with Xmas, Labour weekend etc) until at least end of January or February.

2. **KCDC is currently reviewing part of the Otaki plan; in a piecemeal manner and has at best deviously managed to adjourn its decision on this until hopefully 2011.** The reasons given for the adjournment apply equally to this review. PLEASE ABANDON THIS (OTAKI) REVIEW.

3. **The Town Plan needs to be co-ordinated for the whole area and in all aspects, particularly regarding urban form, transport, infrastructure.** There needs to be more time and more input from involved groups and individuals.

4. **People will always object to things that affect them selfishly.** The input from forward thinking groups, private planners, professional and individuals needs to carry more weight in today's world of email "bombardment" to avoid distortion of submissions and democracy.

In addition, abandon the proposed changes to the Otaki plan until an overall review of what's needed in the various areas can be undertaken and co-ordinated to best develop Otaki for the future to develop a vibrant “village” and incorporated town.

5. **Waikanae North Ltd**
   
   **COMMENT ON ALL DISCUSSION DOCUMENTS**
   
   Waikanae North Ltd (WNDL) owns a significant area of land to the north of Waikanae. The land has been recently been rezoned under Plan Change 69 and is now referred to as the 'Waikanae North Development Zone' (WNDZ).

   **We are, however, concerned that some changes and concepts proposed may affect the ability of WNL to implement the Waikanae North concept plan as contemplated by the operative District Plan. Given the high level of commitment by WNL, together with the public consultation and hearing processes needed to procure the WNDZ, any elements of the District Plan Review which compromise or complicate the efficient implementation of that development as currently prescribed, will be difficult to accept.**

   We understand that the Development Management Strategy promotes this particular location (ie the WNDZ) as the core of the District's future growth and advise that in our view, particular care must be exercised to ensure that development within this zone, can be carried out generally as anticipated, without generating uncertainty for developers.

   While giving the District Plan review support in principle, we are concerned that we are as yet, unable to assess the impact of the proposal on the land within the WNDZ as insufficient detail is available at this, early stage. We also advise that much more detail is needed for us to either properly understand the implications of the proposal or to form an opinion about the nature of the impact of implied changes to the District Plan.

   WNL’s concerns include the evolution of any specific provisions dealing with or introducing, for example, but not necessarily limited to:
   - the revision of residential yard requirements;
   - the way in which hazard zones are defined [WNDZ has a defined seismic hazard zone, currently ok to build over];
   - the integration of design guides into the District Plan rather than a less rigid approach as appropriate;
   - the way in which financial incentives are defined and administered for location-efficient development;
   - the review of SDPR and its implications;
   - the criteria for review of road hierarchy consistent with network hierarchy;
   - the setting of energy budgets to be achieved by residential dwellings;
   - the limiting of development where infrastructure is constrained (such as floodwater attenuation controls);
   - requirements for driveway/dwelling design on natural drainage paths;
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<td><strong>GLOBAL CHANGE - ISSUES AND PRESSURES</strong></td>
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<td>The comments appear to have covered all of the currently envisaged issues.</td>
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<td><strong>URBAN FORM</strong></td>
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<td>In our view, the Council's suggested 'smart growth' approach is supported and is aligned with the WNDZ concept. The 'form based' codes which have been used in the WNDZ are a planning mechanism which yields the outcomes which the KCDC seem to be suggesting is appropriate. The WNDZ has a regulatory plan and building form standards which typically are the basis of form based codes. We therefore suggest that the concept of form based codes be explored for the whole District and that non-regulatory design guides therefore remain for guidance only. The KCDC will be familiar with the fact that the Ministry for the Environment is undertaking a review of the RMA and in particular are considering urban design and infrastructure reforms to reinforce good urban design practices. We are very skeptical that banks will be proactive in the area of an affordability index that may be a mechanism to lower mortgages (page 19). The Council should consider rates relief as more proactive approach to lowering district wide costs. We believe that the Development Management Strategy of 2006 is in need of urgent review, given the recent NZTA decision on the Western Link Road alignment, proposed changes to water resourcing options, rail transport enhancements, developer-led plan changes (Paraparaumu Airport, WNDZ, Ngarara) and so on. We believe that this review should be completed before 'micro-management' before the District Plan Review can be properly considered.</td>
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<td><strong>BIO DIVERSITY</strong></td>
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<td>In our view, the Open Space Strategy document should be released for comment immediately and in parallel with this District Plan Review. The comments appear to have covered all of the currently envisaged issues.</td>
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<td><strong>LANDSCAPE CHARACTER AND HERITAGE</strong></td>
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<td>We consider that the form based codes as used in the WNDZ (see Urban Design and Transport above) should attend to concerns about the heritage feature and character protection. We also consider that character assessments in the various zones must be completed and opened for public consultation as a first step in this process. The comments appear to have covered all of the currently envisaged issues.</td>
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<td><strong>NATURAL HAZARDS</strong></td>
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<td>Generally the issues are summarised the issues correctly</td>
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<td>We generally support the review of the SDPR and the inclusion of the NSZ4404:2010.</td>
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<td>We recommend that the elements of infrastructure which are examined under the review be broadened to include consideration to the location, size, type and future makeup of elements including, for example:</td>
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<td>• Medical facilities (private and public),</td>
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<td>• Water infrastructure, Sewerage infrastructure,</td>
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<td>• Open spaces,</td>
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<td>• Alternative and conventional energy,</td>
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<td>• Airports and related infrastructure,</td>
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<td>• Knowledge economy and business.</td>
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<td>In our view, these elements must be considered in the context of other, related infrastructure to ensure an integrated and optimally procured outcome is achieved.</td>
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<td>We also recommend that the three elements of urban form (the built environment), infrastructure (roads etc) and open space (the public realm) be considered together rather than as separate elements. In our view, to treat them in relative isolation (as has been done with these discussion documents) creates the potential for disjointed outcomes and misaligned priorities.</td>
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<td>We also consider that riparian margin extensions should be limited to those areas where streams are greater than 3 metres in width. We also consider that alternative treatments should be given to stream margins where appropriate - for example, the margins around the edge of the WNDZ and the large pond are proposed to be landscaped in other ways rather than by planting to provide public amenity.</td>
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<td>The comments appear to have covered all of the currently envisaged issues.</td>
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<th>138452</th>
<th>Caleb Royal</th>
<th>COMMENT ON ALL DISCUSSION DOCUMENTS</th>
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<td>1. Greater policy emphasis on Iwi involvement in all aspects of operations and governance. Need to be able to demonstrate that Iwi concerns are being addressed with regards to environmental issues and pressures.</td>
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<td>2. Generally on the right track. Need policies which enable Iwi to be involved in all aspects of district management.</td>
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<td>3. It appears there needs to be far greater emphasis on a treaty partnership approach to all aspects of the District Plan. Although Maori Committee is a good start, Iwi need governance representation which is also mirrored in operational representation.</td>
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<th>138453</th>
<th>Miriam Selby-Rickit</th>
<th>COMMENT ON ALL DISCUSSION DOCUMENTS</th>
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<td></td>
<td></td>
<td>1. But more issues on Maori are required.</td>
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<td></td>
<td></td>
<td>2. Yes, generally on the right track.</td>
</tr>
<tr>
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<td>3. Please consult with Iwi. For example, roading, infrastructure, character and heritage, biodiversity management are read over the documents and there is very little information on tangata whenua.</td>
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<th>138543</th>
<th>Aurecon</th>
<th>COMMENT ON ALL DISCUSSION DOCUMENTS</th>
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<td>We were surprised not to see a topic paper relating to business development within the District over the planning horizon. Ongoing commercial and industrial development will be important to Kapiti's progress over the future planning horizon and as such, we would encourage the Council to seek input from citizens and the business community alike on this topic including views on such matters as the Paraparaumu Town centre (existing area and the zone) and the role of small retail and industrial areas within the District.</td>
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GLOBAL CHANGE: ISSUES AND PRESSURES
- We acknowledge the importance of incorporating sustainability into the District Plan and the need to remove existing barriers currently contained within the objectives, policies and rules. The plan should encourage and provide direction with respect to homeowners and businesses wishing to pursue micro-generation initiatives. |
- Therefore, further consideration should be given to the use of allowances for renewable energy sources and the provision for future technologies and requirements (ranging from energy sources from wind turbines and solar panels to recharge stations for electric cars). |

URBAN FORM AND TRANSPORT
- Agree that the use of spatial and structure planning should be increased |
- Disagree that Design Guides should be incorporated into the District Plan. |
- Agree that intensification around current and future transport nodes should continue and be improved on. |
- Agree that parking requirements should be reviewed to ensure that there is a realistic and consistent approach to parking. |
- Disagree with comments about frustration of pedestrian and cycle connections. |
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**BIODIVERSITY**
- We strongly recommend that any changes to the District Plan concerning the protection of ecological sites should be informed by a thorough survey of existing and any potential additional sites to confirm those areas truly worth protecting and the asset for which protection is being applied. This should also apply to areas highlighted as green network/corridors.
- We are of the view that setback provisions for ecological sites should be reflective of the value of the ecological resource for which protection is sought and as such a blank setback provision should not be pursued.
- While there is undoubted merit in the clustering of rural residential development to retain large areas of undeveloped land, we do not agree that this model should be expanded to the rural zone in its entirety as the approach to new residential development. The District Plan should maintain a flexible approach to housing delivery and allow for a variety of housing types and lifestyles within the rural zone of the District.

**LANDSCAPE, CHARACTER AND HERITAGE**
- We agree that a clear identification of landscape, character and heritage values needs to be undertaken.
- Any additions to the Heritage Register, particularly ecological sites and landscapes should be subject to thorough investigation and survey to confirm that protection is justified and the extent of the asset for which protection is being applied.
- The identification of key view shafts within Kapiti District would be a useful addition to the information provided on the District Plans proposals map. We question, however, the use of blanket height limits and set backs as the impact activities and structures on view shaft will vary.
- We question the need to make the subdivision design guide an attachment to the District Plan. The current cross reference method is sufficient and allows the document to be updated outside the RMA process.
- The application of average as opposed to minimum lot sizes has merit allowing subdivision layouts to be more responsive to the receiving environment. However, this should not preclude more traditional forms of rural residential development taking place as the District Plan should not overly fetter the delivery of housing diversity to meet the varying needs of the population.

**NATURAL HAZARDS & MANAGED RETREAT**
- We agree that the District Plan maps need to be updated to include all hazards, including land subject to landslips.
- Zoning which categorises hazards and risk from high to low and associated rules to manage land uses within these hazard zones should be adopted. However, flexibility will be necessary as hazards will change over time.
- Agree that the establishment of new commercial forests or felling of existing commercial forests be made a controlled activity (for fire prevention purposes).
- Do not agree that the relocation of existing houses in hazard areas is an RMA issue. The District Plan should allow for the relocation of dwellings as permitted/controlled, but the associated costs etc lie outside the District Plan.
- The District Plan should focus on controlling future development in hazard areas.

**FOOD AND RURAL PRODUCTIVITY**
- The application of green roofs to contribute to food production is acknowledged and we see no reason why the District Plan should provide for such initiatives but it should not pursue them as requirements.
- We support the allowance/promotion of Farmers’ Markets through a review of the District Plan provisions concerning temporary events. In a similar vein, we have no objection to Council introducing changes to the District Plan rules to facilitate the development of community gardens subject to certain standards (e.g. opening hours, traffic).
- We question the use of reserves contributions for the acquisition of land for community gardens, food forests and other food-producing reserves. Monies for this type of activity should come forward from other Council funding streams.
- It is our view that the District Plan should continue to allow for a range of residential lot sizes including medium to high density housing. Even small outdoor living areas can allow householders who have chosen to live in a more dense urban form to grow at least some of their own food should they so wish.
- We acknowledge that the productive capacity of soil needs to be analysed for the District as a whole but we do not agree that land should be automatically retained for food production in perpetuity if it has a ‘too valuable’ classification.
- While clustering of rural residential development will retain large areas of undeveloped land capable of being used for food production, we do not agree that this model for new housing should be expanded to the rural zone in its entirety. The District Plan should maintain a flexible approach to housing delivery and allow for a variety of housing types and lifestyles within the rural zone of the District.

**INFRASTRUCTURE AND ESSENTIAL SYSTEMS**
- Agree that the objectives and policies in terms of Low Impact Urban Designing and Development (LIUDD) should be strengthened and clarified.
- Agree that the Subdivision Development Principles and Requirements (SDPR) should be reviewed, incorporating local consultants and residents views, as they know the area.
- We agree that there should be a mechanism for assessing and managing contamination in soil, the best way to deliver this would be by way of a guidance document for applicants.
- Disagree that waste management planning should be incorporated into activity standards in the District Plan.
- Agree that any unnecessary barriers to the use of recycled materials should be eliminated.
- Disagree that carbon accounting should be incorporated into activity standards in the District Plan.
- Agree that any unnecessary barriers to the deployment of broadband in the District Plan should be eliminated.
- Disagree in part that the requirement for on-site attenuation and disposal of stormwater should be strengthened.
- Agree that technical standards for LIUDD, 0 & M Manuals, QA Protocols and COP for Grey Water Dispersal Systems and Rain Harvesting Tanks should be incorporated into the SDPR. And not the District Plan.
- Disagree that other planning mechanisms to reduce impervious cover and allow more open space in subdivisions and development for “hydraulic neutrality” solutions to be implemented should be incorporated in the District Plan.
- Agree that requirements for sediment control and erosion control measures to be adopted to protect existing infrastructure as well as the natural environment. However this is also controlled by the Regional Council and care should be taken not to create confusion with two sets of rules.
- Financial / Development contributions should be subject to a robust discussion as part of this District Plan review.
Firstly I would like to congratulate Council on preparing such a comprehensive set of documents. I am pleased to see that many of the suggestions DOC made on the preliminary scoping documents have been explored and addressed in these documents. Linkages between the documents
The discussion documents describe topics that are environmental conditions (or "states") and human "pressures" that can affect these conditions. Within the documents are thoughtful assessments of potential District Plan "responses" or proposed provisions, which aim to avoid, remedy or mitigate undesirable changes that can occur to the conditions.
I suggest that the relationships between the state and pressure documents could be developed further, as it is my understanding that it is these relationships that drive the need for District Plan responses. Specifically, two of the discussion documents describe conditions or "states"—the Biodiversity discussion document and the Landscape, Character and Heritage document. The other five documents mostly describe "pressures". It would be useful if each pressure (such as urban form, transportation, infrastructure, food production and hazard management) is assessed for its actual and potential effects on Kapiti's biodiversity, landscape, character and heritage. As an example, the section on "Issues, challenges and trends" for the discussion documents on each "pressure" could include text on managing the effects of these activities on the environment, I suggest that this approach may enable the community to appreciate the need for comprehensive "responses", such as policies, rules and methods that may need to be reviewed in order to best manage natural resources (including biodiversity, landscape and heritage) in a sustainable manner.

GLOBAL CHANGE: ISSUES AND PRESSURES
I suggest that the document should have a more focused discussion on potential effects of global change that would be specific to the Kapiti Coast District. This should include a discussion of potential effects of global change, and effects of potential responses to global change (such as the development of wind power generation), on the state of the environment.

URBAN FORM AND TRANSPORT
I suggest that section 3 should include a discussion of potential positive and negative effects of urban form and transport on the environment (such as, biodiversity, landscape, amenity, character and heritage).

BIODIVERSITY
Council's role under s31(i)(b)(viii) of the Resource Management Act 1991 (RMA) includes "the maintenance of indigenous biological biodiversity". I consider this to be a higher test than the statement in Section 2 of the discussion document that considers council's role in "minimising biodiversity loss". Overall I suggest it may be useful for the document 'to focus more specifically on Kapiti's biodiversity (and biological history) rather than New Zealand in general. With this in mind, the importance of dune, wetland and estuary habitats in the district may deserve more attention. In addition, although district plans have limited responsibility for freshwater and marine biodiversity, it is my understanding that the Proposed Regional Policy Statement for the Wellington Region (Proposed RPS) includes several policies which will require Kapiti to consider how land use and activities that Council manages may affect these aquatic habitats. In Section 3, I support your identification of scattered remnants of indigenous vegetation as important to the maintenance of biodiversity. I note that these sites may also provide valuable feeding sites for some mobile species, such as kereru during their critical life stages. I suggest a meeting with some of our technical specialists may be of value to your plans to monitor biodiversity. Setting up a monitoring programme and interpreting monitoring results are complex tasks that would benefit from interagency cooperation. For example, "It is my understanding from conversations with our ecological technical specialists that keystone species are not a useful indicator of biodiversity in New Zealand terrestrial systems. Revisiting this discussion topic after meeting with some of our staff may be a useful next step in the District Plan review. Section 3 should include a discussion and reference to Statement of National Priorities for the protection of rare and threatened biodiversity on private land. This statement identifies four priorities for protection:
• indigenous vegetation associated with land environments that have 20 percent or
• less remaining in indigenous cover;
• indigenous vegetation associated with sand dunes 'and wetlands;
• indigenous vegetation associated with "originally rare" terrestrial ecosystem types; and habitats of acutely and chronically threatened indigenous species.
The full reference is:
I'm glad to see Section 5, District Plan Considerations, includes discussions on the, importance of riparian vegetation. However, I am uncertain why, it is stated 0-n page 14 that, "specifically seeking to exclude stock from riparian margins is beyond the scope of the District Plan'. An explanation of the ability of a district plan to regulate this type of activity would be useful for us and other readers of this document. The section on "state of the environment monitoring 'and reporting" does not mention lizards, which are an important component of Kapiti's biodiversity. In the box that lists measures that could be considered, you may want to include:
• defining what are important areas for regeneration or enhancement for the maintenance of biodiversity,
I consider the discussions on forestry and coppicing would be better placed in the document on Food & Rural Productivity as these activities are human "pressures" that can affect (positively or negatively) biodiversity, landscape, amenity and character.
Section 6, Biodiversity beyond the District Plan should include recognition of the 16 sites (totalling 250ha) that are protected with Department of Conservation covenants. Similar to QEII covenants, these are private lands managed for conservation purposes by Deed of Agreement under either the Reserve Act 1977 or the Conservation Act 1987, or both. I support the identification of the following possible new concepts: Riparian margin setbacks, and Ecosystem services budgets.

LANDSCAPE, CHARACTER AND HERITAGE
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<td>Section 4 does not address Council's need to maintain and, enhance amenity values in accordance with s7(c) of the RMA. I support that section 4 acknowledges that the Proposed RPS (Policy 24) has a comprehensive set of criteria used to define outstanding landscapes. I suggest Kapiti's District Plan review should consider using this set of criteria as, well as additional regionally-specific criteria to help define locally significant landscapes. In section 5, you may want to consider using the term &quot;geopreservation sites&quot; to better describe what are listed as &quot;geological sites&quot; in the list of heritage items. Although section 4 identifies the preservation of the natural character of the coast as important, there is no specific acknowledgement in Section 5 for the need of the District Plan review to specifically address this matter. I consider a more comprehensive topic for this discussion document would be - landscape, amenity, character, natural character of the coast and heritage.</td>
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<td>NATURAL HAZARDS &amp; MANAGED RETREAT The Key Concept discussed in section 3 should clarify that nature is typically only a hazard when people or their property are at risk. I suggest that section 3 should include a discussion of potential positive and negative effects of natural hazards and managed retreat on the environment (such as, biodiversity, landscape, natural character of the coast and heritage). In general, I found this discussion document very thorough and well written.</td>
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<tr>
<td>138794</td>
<td>Paraparaumu Airport Ltd</td>
<td>COMMENT ON ALL DISCUSSION DOCUMENTS We act for Paraparaumu Airport Limited ('PAL'). We have reviewed the first seven discussion documents that Council has prepared to inform the District Plan review process and provide the following comments. PAL supports the signalled review of the car parking standards. They are mis-aligned to recognised current standards and do not necessarily reflect practicable parking demand. Over-supplying car parking is an unwise use of resources. In support of biodiversity, PAL submits that its current Buffer Zone should be amended to reflect the Buffer Ambition Plan contained within the Environmental Management Plan. Finally, PAL submits that the necessary changes be made to the designation in favour of the new obstacle limitation surfaces at Paraparaumu Airport to support the Airport as a regionally strategic item of infrastructure.</td>
</tr>
<tr>
<td>138822</td>
<td>Billie Taylor</td>
<td>COMMENT ON ALL DISCUSSION DOCUMENTS I think the proposed principles in all your documents are excellent. How they might be implemented is another matter. Should this not be part of the review.</td>
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<tr>
<td>138820</td>
<td>D Moore</td>
<td>COMMENT ON ALL DISCUSSION DOCUMENTS 1. Good to see Kapiti with correct spelling (ie macron). Keep it there. Sustainable future planning great. No consideration apparent regarding Iwi involvement/ responsibility in local planning/ development issues. 2. Good to see local character and heritage issues flagged BUT no mention of Iwi/ Maori input/ consultation. Proactive approach good to see – protection of landscapes etc. 3. No, Maori issues seem to be included in these papers: - Kaiiakaitanga by Maori - Wahitapu protection mentioned - Power sharing/ decision making with Iwi/ co management - Otaki Bilingual Town signage etc No real mention of Iwi/tangata whenua attitudes/ values relating to land use and/or development.</td>
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There is no reference to "valuing local knowledge" with regard for example to "monitoring" the environment. "Strict" monitoring is such a cost effective issue listen to the community as issues arise and implement a "Response Action Plan" should be included.

3. Please include "local outcomes" principles (see attached), eg Greater Otaki vision, Te Horo Beach, Otaki Beach local outcomes (districtwide) principles included specific to each area.

Care around continued farming in a rural areas that has been subdivided for lifestyle blocks – no mention of impact on H2O table when both "activities" drawing H2O and waste H2O disposal. Time dependent these "irrigation toners" can pump 156 litres per second.

Impact of continuous run-off from farms into streams. How to stop/mitigate distribution of ecology systems and demonstrate H2O quality.

I think it is a great instrument on this body of proposed principles that the proposed expressway will put these into jeopardy.

Look forward to detail review which I wish to comment on, H2O tanks 1 metre off boundaries!! And block basements in flood prone areas – do "clusters" work?

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| 140063  | The Energy Efficiency and Conservation Authority | GENERAL COMMENTS
1. EECA welcomes opportunity to participate in the review of the Kapiti district plan. EECA is a Crown entity established by the Energy Efficiency and Conservation Act 2000. Its statutory mandate is to encourage, promote and support energy efficiency, conservation and the use of renewable energy sources. In undertaking this function EECA reports directly to the Minister of Energy and Resources.

2. EECA supports the Council's focus on identifying and addressing implications of significant issues including climate change; and issues surrounding the provision of effective infrastructure and urban form and transport. EECA is interested in the role of the district plan in promoting improved energy efficiency and increased use of renewable energy resources in the district.

GLOBAL CHANGE: ISSUES AND PRESSURES

New Zealand's greenhouse gas emissions have significantly increased since the 1990's. The largest percentage increase has been in the electricity industry. Unlike some other parts of the economy, there are significant economic opportunities to reduce electricity emissions through the use of renewable energy resources.

I New Zealand's electricity demand is predicted to continue to grow and over the longer term, ongoing economic and population growth will continue to place upward pressure on electricity demand. As a result, it is essential that energy efficiency improves and energy consumption patterns change and that New Zealand has the ability to meet demand growth in an efficient, secure, affordable and environmentally responsive manner. In addition To energy efficiency, the development of renewable energy resources at various scales is vitally important for responding to these issues.

A key economic issue identified by the Council is the impact of volatile oil prices on the district's economy. Electricity generation from renewable energy resources such as hydro and wind resources is not subject to the same volatility. Diversity in energy supply through the development of renewable energy reduces exposure to energy supply disruptions or price shocks that are commonly associated with fossil fuels.

6. The discussion document indicates that the use of biofuels will result in the decline in food crops through creating accelerated food prices and possible food shortages. Biofuels in New Zealand are currently made from waste or byproducts (maize is not used as a biofuels crop) and biofuels are not a primary driver of food prices - the primary drivers are oil prices, macroeconomic changes influencing exchange rates, and underlying supply and demand for food. A number of recent studies confirm the benefits to New Zealand of developing bioenergy resources.

There is significant opportunity for New Zealand to develop a purpose-grown forestry-based biomass resource. Such forests could utilise low productivity grazing land on steep terrain with low current financial returns. The biomass arising from these forests could be used to provide heat, electricity and transport fuels for New Zealand whilst mitigating some environmental issues (reducing erosion and nutrient run-off; improving water quality; enhancing biodiversity) at the same time as minimising our carbon liabilities and the impacts of volatile global oil prices. The district plan should proactively enable the development of bioenergy resources.

7. EECA welcomes reference to the Kyoto Protocol. The protocol is the principal international response to climate change, following on from the United Nations Framework Convention on Climate Change. As a party to the protocol, New Zealand has agreed to reduce its carbon dioxide (CO2) emissions in the first commitment period (2008-2012) to 1990 levels or otherwise take responsibility for any surplus emissions.

8. The Government is working towards an agreement to succeed the Kyoto Protocol after 2012 and is actively participating in international climate change negotiations. New Zealand has joined the Copenhagen Accord and submitted a condition target to reduce greenhouse gas emissions by between 10 and 20 percent by 2020.

Resource Management Act: 1991 (RMA)

9. There are two principal ways in which particular regard may be given RMA sections 7(ba) the efficiency of the end use of energy; 7(i) the effects of climate change; and 7(j) the benefits to be derived from the use and development of renewable energy, these being:

- When making decisions on resource consent applications for renewable energy developments: and
- By incorporating policies and provisions in plans and policy statements which recognise and provide for renewable energy developments and their benefits.

10. In regard to section 7(j), the Environment Court4 identified the benefits to be derived from the use and development of renewable energy to include:
- security of supply;
### SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

- reduction in greenhouse gas emissions;
- reduction in dependence on the national grid;
- reduction in transmission losses;
- reliability;
- development benefits;
- contribution to the renewable energy target.

11. To give further context to RMA section 7 (j), the Government is currently promulgating a National Policy Statement for Renewable Electricity Generation. This provides a strong indication of the Government’s intention to address renewable energy issues through the RMA. Its proposed objective is, to recognise the national significance of renewable electricity generation by promoting the development, upgrading, maintenance and operation of new and existing renewable electricity generation activities, such that 90 per cent of New Zealand’s electricity will be generated from renewable sources by 2025 (based on delivered electricity in an average hydrological year):

12. EECA notes that the New Zealand Energy Efficiency and Conservation Strategy (NZEECS), prepared under the Energy Efficiency and Conservation Act 2000, is a strategy which the Council shall have regard to (RMA s74(2)(b)(i)). In July 2010, the Government released a draft New Zealand Energy Strategy (NZES) and a draft New Zealand Energy Efficiency and Conservation Strategy (NZEECS).

13. The draft NZES replaces the 2007 NZES and proposes the Government’s strategic direction for the supply and use of energy. It aligns with the overarching goal of the Government, which is to grow the New Zealand economy to deliver greater prosperity, security and opportunities for all New Zealanders. The strategies focus on security of supply, affordability, and environmental responsibility, with the overriding goal of maximising economic growth. The strategies contain the Government’s target that 90 percent of the New Zealand’s electricity will be generated from renewable sources by 2025 providing it is not at the expense of security of supply.

14. The district plan presents a valuable opportunity for specific objectives and policies to promote energy efficiency measures and promote the use of renewable energy resources in the district. EECA supports provisions that would allow for the integration of energy efficiency principles in urban form and integrated land use and transport planning.

### URBAN FORM AND TRANSPORT

The built environment and transport systems in particular are important in terms of the end use of energy and their impact on future energy issues and greenhouse gas emissions. They are very long lived elements of urban infrastructure which can constrain society’s future energy related choices. Conversely, strategic management and planning can provide communities with ongoing resilience against future threats and uncertainties, such as energy resource depletion and associated price increases and volatility.

Energy efficiency and conservation, solar hot water heating, and renewable energy utilisation, such as solar energy gain and small scale generation, should be key considerations in the design and development of buildings and subdivisions. Passive solar construction in particular saves energy, reduces dampness and condensation, improves sound insulation, increases the durability of building materials and creates healthier dwellings. Solar heating can be the sole source of warmth or can be supplemented by other sources.

EECA supports the proposal to promote low impact urban design and development with respect to energy use. The district plan presents the opportunity to encourage development and settlement patterns that: utilise appropriate site orientation in order to support the principles of optimum energy efficiency and solar energy gain (in relation to the size, shape, layout and orientation of lots, construction processes and general urban form);

Facilitate small-scale renewable energy generation (such as solar photovoltaics and domestic wind turbines along with other measures such as solar water heating systems, heat pumps and appropriate passive solar design considerations);

and minimise transport requirements and provide, where possible, for alternatives to single occupancy vehicles.

In responding to these matters, non-regulatory methods such as design guides could usefully be incorporated into the district plan. EECA also supports the role model and advocacy role of the Council in regard to its own energy development and use patterns.
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<td>INFRASTRUCTURE AND ESSENTIAL SYSTEM</td>
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<td>Issues, Challenges and Trends</td>
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<td>Infrastructure is vital to enable people and communities to provide for their social, economic and cultural wellbeing. Infrastructure associated with the use and development of renewable sources results in a range of positive effects and benefits including improved local security of electricity supply and reduced greenhouse gas emissions. As such, EECA seeks that the district plan should also identify the use and development of renewable energy as a specific resource management issue for the district.</td>
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<td>16. Demand for electricity is projected to increase. In an average hydrological year, New Zealand generates about 70% of its electricity from renewable energy resources, with the balance being made up by fossil-fuelled thermal generation (gas and coal) as required. Most of the renewable generation comes from hydro and geothermal with smaller but increasing amounts from wind. Despite this, over the past few decades a large proportion of electricity demand growth has been met using fossil-fuel power stations. If this trend continues, the long-term trend of increasing electricity related emissions will continue.</td>
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<td>Electricity demand for the Wellington region is forecast to grow on average by 1.5% annually over the next 10 years. Although this is lower than the national average demand growth of 2.1% per year, the region's electricity generation capacity is much lower than the demand, requiring power to be imported into the region. The potential renewable energy resources for the Wellington region are identified in the Wellington Regional Renewable Energy Assessment prepared for EECA. There is particular potential in the district for solar thermal (water heating) generation.</td>
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<td>EECA seeks infrastructure planning provisions that recognise benefits to be derived from the use and development of renewable energy. Such provisions would accord with RMA section 7(j), the government's renewable energy and climate change policy imperatives and the Proposed National Policy Statement for Renewable Electricity Generation.</td>
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<td>EECA seeks that the local, regional and national benefits of renewable energy to be recognised and provided for, alongside policies which seek to avoid, remedy or mitigate adverse effects.</td>
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<td>Planning provisions should be enabling and proactively facilitate renewable electricity generation activities. EECA seeks that the district plan includes objectives, policies and methods that:</td>
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<td>• Provide for the development of renewable energy resources in Kapiti;</td>
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<td>• Recognise the national significance of renewable electricity generation activities and the national, regional and local benefits;</td>
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<td>• Recognise the locational requirements of renewable energy infrastructure;</td>
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<td>• Provide for activities associated with the development and operation of small and community-scale distributed renewable electricity generation;</td>
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<td>• Manage activities that adversely affect infrastructure including reverse sensitivity; and</td>
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<td>• Give effect to the National Policy Statement on Electricity Transmission.</td>
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<td>In regard to relevant standards, the development of renewable energy generation would benefit from explicit recognition of the activity status of generating devices. This will increase certainty for decision makers and potential applications. It is considered that domestic scale wind turbines for example could be appropriately identified as permitted activities and small scale wind generating devices as restricted discretionary or controlled activities.</td>
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<tr>
<td>139151</td>
<td>Bob Wilson</td>
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<td>139152</td>
<td>Patrick Morgan</td>
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<td>139155</td>
<td>Regional Public Health</td>
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|         |                      | **URBAN FORM AND TRANSPORT**<br>RPH supports the focus and direction of this discussion document.<br>We agree with council’s philosophy of focused “consolidated” growth management.<br>We support the criteria for evaluating growth management as outlined on pages 12-13 of the discussion document.<br>An increasing focus on ‘people movement’ within the region, as opposed to mainly ‘vehicle’ movement within and through the region, will become more important as the population grows. Increasing levels of active modes of travel have the potential to significantly reduce chronic disease including ischemic heart disease, stroke, depression and dementia. We support initiatives to protect and develop potential pedestrian or cycle links.<br>RPH supports the review of the existing road hierarchy for consistency with Kapiti’s sustainable transport strategy. The Expressway underscores the importance of KCDC’s focus on growth management and sustainable transport strategies.<br>Ensuring a walkable more connected, and more compact urban form is important for economic growth and for the environmental and social sustainability of each centre within Kapiti and for the region as a whole. Limiting greenfield development is a more responsible use of resources, and allows focused public transport and other infrastructure within and between centres. Maintaining greenfield areas for their food production potential is also important in growing the region’s self sufficiency, food security and employment.<br>RPH supports the council’s focus on avoiding the increasing sprawl of Kapiti, and the introduction of further urban edges. We support the importance of responding to development pressures imposed by the new expressway. This is critical to protecting the social, economic, and environmental viability of existing towns.<br>RPH supports the consolidation of commercial and retail development within town and village centres. However this necessitates clear guidelines to ensure that the ‘liveability and walkability’ of areas are not compromised by the presence of large commercial buildings. For example, ensuring active edges for buildings, keeping car parking to a minimum (or underground), and having retail/office space on ground floors with residential above, are all options...
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<td>for maintaining or increasing liveable urban spaces.</td>
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<td>RPH supports incorporating design guides into the District Plan, thereby increasing their statutory weigh, and recommends that the council ensures sufficient resource is set aside to support developers to implement those design guides.</td>
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<td>Travel Demand Management</td>
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<td>RPH supports increased travel planning and travel demand management and the incorporation of requirements for these into the District Plan. Increased travel demand management is necessary to encourage alternative forms of transport to personal car use, particularly if car parking requirements on new developments are reduced or removed.</td>
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<td>Transport issues associated with growth and the Expressway highlight the need for a focus on public transport, particularly rail and its connecting services, both within the region and in connecting to other towns and cities. It is vital that everything possible is done to encourage modal shift to public transport and improve public transport provision within the region. This includes focusing any new intensification around public transport nodes.</td>
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<td>Minimum Parking Requirements</td>
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<td>RPH supports the review of minimum parking requirements to improve urban design and support integration of land use and transport. Minimum parking requirements could be reduced or removed from plans for residential subdivision and commercial parking requirements. Removal or reduction of parking requirements reduces the subsidy on car use and has the potential to free up space for cycle parking and open public space.</td>
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<td>Requiring cycle parking would also be a positive step towards promoting active forms of transport.</td>
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<td>Housing Affordability</td>
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<td>While this discussion document mentions land affordability and ‘intensification’, infill and higher-density housing, (page 8), nowhere in any of the seven documents has housing affordability been explicitly discussed.</td>
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<td>It has been suggested that there are already issues with availability and suitability of affordable housing in Kapiti – especially for those with mental health issues and those on a benefit. To ensure affordability, there is a need to encourage a range of housing types and choices, often including social housing, to meet the needs of the population.</td>
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<td>The Environment Court recently ruled that Queenstown Lakes District Council can use the RMA as a mechanism to address housing affordability - Plan Change 24 – Affordable and Community Housing. This means that housing affordability can be introduced into the objectives of the District Plan so that it can be considered when resource consent applications are reviewed.</td>
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<td>On page 16, section 6, number 3, we suggest deleting the word ‘allow’ and replacing it with ‘promote’. This could be used to encourage higher-density development away from natural hazard prone areas to compensate for less potential public health risks of these hazards e.g. water shortage, sewage contaminated flood waters.</td>
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<td></td>
<td>Natural Hazards and Managed Retreat</td>
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<td>RPH congratulates and supports the council for considering the impacts of climate change in both the Natural Hazards and Managed Retreat and the Global Change discussion documents. We acknowledge the comments on the potential public health risks of these hazards e.g. water shortage, sewage contaminated food waters.</td>
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GLOBAL CHANGE ISSUES AND PRESSURES

This document is mostly well thought out and presented but lacking in consistency. The topics dealt with and the aims are comprehensive, but "Best practice response" does not go far enough in the suggestions of mitigation.

Two areas where Council can take more stringent measures for a more sustainable future is: Energy use and Transport.

I also want to comment on very unfortunate/or missing statements in the document:

P10. Response para 3: "Some people in low paying jobs may no longer be able to afford to drive to work and so may lose their income." This is a statement that clearly says: "without a car you cannot work, there are trains, buses, legs and bicycles to take people to their work and broadband for people to work from home. Already Kiwis rely too much on their cars, we do not need the Council to emphasize it.

P.12: "The current distorted population structure in the District will make adaptation relatively difficult and potentially decrease the capacity for community resilience"
Why? Older people can be an incredibly powerful resource in a community, if their expertise is sought.

Cycling, walking and public transport facilities are missing in your list of degree for self-sufficiency at the household level.

Energy Resilience (p.13)

Electricity & Gas for industry and private homes: There is no mention at all of measures to save energy. Saving energy = new production ie what is saved means more is available for essential services and so can reduce new production. Huge amounts of energy is wasted in private homes. The council has a responsibility to use its powers (bombarding residents with messages) to limit such waste.

Transport resilience
I support strongly the following measures:
*"Travel demand and provision of practical, fit for purpose travel options such as walking and cycling, public transport and private cars".

I support: wind, solar and tidal photovoltaic cell, but NOT biofuels (unless produced by food waste)
I support transport efficiencies ie public transport, walking and cycling. The statement that "these transport options may only occur when fuel prices make private car use unaffordable for many people" is defeatist. KCDC must make more effort to change the mindsets of its residents to shift to these means for transport with whatever power KCDC has.

One way to do this is: Reduce parking in town centers and reduce speed limits on residential and arterial roads (for example Kapiti Road, Mazengarb Road, Ratanui Road, Rimu and Raumati Roads)
Support passive heating and cooling.
Support a District Plan that direct location and type of development to minimize need to travel.
Support increasing planting to reduce greenhouse gases. (at the moment Council is allowing trees to be chopped down for car parks)

6. INFRASTRUCTURE AND ESSENTIAL SYSTEMS

Contaminated Sites
RPH supports KCDC adopting mechanisms in the District Plan to address both known and potentially contaminated sites e.g. soil contaminants in previous market garden sites. This will help to ensure that where there is known historical contamination or the potential for contamination proposed changes to the land use will require an assessment. If contaminants are at levels that could cause harm to health, RPH recommends that District Plan provisions require appropriate mitigation measures to be undertaken.

Code of Practice for Grey Water Dispersal Systems and Rain Harvesting Tanks
RPH supports the proposed Code of Practice. We made a submission on the Kapiti Coast Rainwater and Greywater Code in March 2009 detailing proposed amendments to help ensure that potential public health risks were minimised. We would be happy to review the draft Code as part of the new District Plan process.

Sensitive Activities
RPH recommends that new District Plan provisions should consider polices and/or rules that minimise the potential for incompatible activities to locate adjacent to or in close proximity to each other.
This may occur where District Plan zones border each other or zones allow activities that are potentially incompatible to be established adjacent to each other. For example; locating an early childhood centre next to a panel beating operation generating potentially hazardous discharges to air.

A further example is where the District Plan allows the establishment of an early childhood centre next to a busy road or intersection where vehicles produce significant amounts of fine particulate and other potentially hazardous contaminants that could adversely affect the health of children at the centre.

Low Impact Urban Design and Development (LIUDD) Quality Assurance
RPH supports the comments on page 13 outlining potential public health issues concerning attenuation ponds and wetlands. Blue-green algal blooms and mosquito breeding environments can result in both nuisance and potentially significant public health issues e.g. establishment of exotic mosquitoes. It is important to ensure that these types of water bodies are constructed and managed in a way that minimises risks to public health.
New Zealand has the lowest land-fill rates in the Western World. Our landfill rates should be increased to encourage people to compost and recycle. Emissions from landfills contribute hugely to Greenhouse gases. Much food is thrown away here, not sure of the %, but for comparison in Britain it is estimated that 11% of household rubbish is food. The Council should start collecting household and restaurant food surplus and turning it into biofuels or methane.

PI4 para 5: “the District Plan can ensure that productive land is not developed for urban uses” Why is Council then working with NZTA for a 4-lane Expressway through productive land?

Support District Plan's potential role in supporting economic resilience.

Support setting up reporting on air, water and soils from the Kapiti Coast. Be the first community to report to its residents on the state of our living environment. Reporting regularly will raise the value in people's mind of the natural environment (free) services vs economic services/industry. Presently only people who are already interested and who read Council reports and the local paper get to hear about the state of our natural resources which really matters more than economics. Reporting could be monthly in the Dominion and on our radio stations ie Access Radio, Beach FM etc.

There are substantial economic benefits to be gained in raising the walking and cycling budget both with regards to the savings in new roads, maintenance and health costs.

Strongly support review of zoning systems and identifying the needs to improve natural systems.

One example is the Waiwhetu Stream in Otaki. This stream should be cleaned and planted with riparian planting, spraying and leakage from fields prohibited and the stream should be stocked with eels again to help in food resilience.

The Waitohu Stream also has potential as a tourism and local playground if camping groups were erected along it and canoe hire was established. (I have seen this done in Denmark for the great enjoyment of locals and tourists.) I support all RECOMMENDED DISTRICT PLAN REVIEW ACTIONS

CONCLUSION
I support all actions under this heading, but wish to add:
Barrier to Remove: (3) revise residential garage/carport requirements.

GLOBAL CHANGE: ISSUES AND PRESSURE

1. Balanced approach to risks and opportunities

It is important that both the opportunities and risks associated with global change are presented as part of the review of the District Plan. The discussion document presents a bleak picture as to the future of the Kapiti Coast district as a result of global change. Change management always involves some level of opportunity.

Page 10 is the first point in the document where opportunities for innovation are considered. The issues of peak oil and climate change are politically-charged topics. Presenting a bleak picture on these topics may cause people to disengage with the subject. It is important that the Council encourages people to engage on these matters, and a more balanced view that presents both risks and opportunities regarding these issues is important to assisting this process.

2. Identify internal tensions within the District Plan

There are some internal tensions within the District Plan that Council will need to grapple with if it is serious about ensuring greater resilience and adaptation to respond to global change in the district. In particular, provisions to support renewable energy development may be in tension with other objectives for protecting outstanding landscapes and biodiversity. Wind turbines in prominent places area case in point. If the District Plan restricts development of this nature in such areas it may impede the resilience and adaptation the Council is trying to promote. The review of the District Plan needs to assess where these internal tensions exist and identify opportunities to resolve them.

3. Examine assumptions

In dealing with global change issues it is important to state the assumptions that underpin the review and for the Council to be open to having these tested. A key assumption, for example, is how the issues are defined in relation to the district. While statutory provisions set boundaries for the Kapiti Coast district, neighbouring areas also have a role to play in building resilience and adaptation and it is unclear how the Council intends to work with the Regional Council and neighbouring district councils as well as other agencies in managing these issues. These relationships will be critical to the district's role in the future management of global change issues.

(Note, the discussion document says the biodiversity discussion contains information on ‘carrying capacity’. A word search of the biodiversity discussion document does not identify this phrase.)

BIODIVERSITY

Need for evidenced based planning

Kapiti Coast District Council needs to ensure its planning provisions are credible. This requires any planning provision to be developed on the basis of good evidence. While the discussion document on biodiversity outlines high level issues at a global and national level, there is a lack of information on the state of the district's indigenous biodiversity. It would help to know what the district is doing well and where improvements should be prioritised.

The discussion document identifies that the Council has not carried out monitoring of the district's indigenous biodiversity, or any monitoring of the District Plan's effectiveness since it became operative. The main reference is to the level of funding committed to this issue and the extent of area subject to legal protections.

As a submitter I endorse the proposal that indigenous biodiversity monitoring be carried out as part of the District Plan review. Without this information the review of the District Plan could be informed by unsubstantiated assumptions. For example the document states “biodiversity gains are tenuous” (p. 13). This statement is not based on evidence and counters the anecdotal information reported elsewhere in the document on increased kereru numbers and the increased numbers of community groups (and their efforts) involved in biodiversity protection.

Recognise and encourage community efforts in protecting indigenous biodiversity
The document's negative account of 'biodiversity gains' risks giving the community a message that their efforts in protecting indigenous biodiversity seem ineffective. Having been involved over five years in pest management, dedicating time on a weekly basis and $100 of dollars over many years, I do not feel encouraged by the document to continue this work. Maintaining the quality of indigenous biodiversity relies on human intervention ie through pest management. The Council needs to encourage these activities and recognise the good work of the community. A lot of people are dedicating great effort to maintain indigenous biodiversity. This includes individuals, community groups, and businesses. It is important that these efforts are recognised in order to maintain the momentum that they have achieved.

Clarify framework for approach to managing biodiversity

It is unclear from the discussion document what framework will be applied to review of the District Plan. It would be helpful if the key priorities for protection were identified. Currently an expansive approach is presented ie proposing to protect ecological corridors, wetlands, coastal areas, steep areas, riparian margins, restoration areas (not defined), and water catchments (as a reader I assume this means water supply catchments as the entire district encompasses water catchments). This approach is likely to have a disproportionate burden on some landowners and may be unaffordable. The Council should help direct the community to the areas requiring the most support and needs to demonstrate leadership in doing so.

It may be appropriate to develop a hierarchy approach, for example, that places stronger protections on 'originally rare' or threatened ecosystems. If stricter controls are applied these should be mirrored with greater levels of incentives. More common or well represented habitats do not require the strength of controls as other more threatened areas.

Explore non-regulatory methods and pest management

The review focuses on expanding the area that the District Plan 'should' regulate to protect indigenous biodiversity. Placing greater focus on managing pests may have the best results for improving the quality of indigenous biodiversity. It is possible the benefits would far exceed any rule. Minimally exploration is given to the role of pest management and opportunities to capitalise on this. Methods are not restricted to rules and provisions. The full breadth of methods, including non-regulatory methods should be examined as part of the District Plan review.

Balancing economic, environmental and social factors

Protection of indigenous biodiversity requires a balanced approach that enables economic factors to be taken into account to help complement and support biodiversity protection (such as fencing indigenous vegetation, trapping pests, and planting indigenous species or feeder plants for indigenous birds). Protection activities involve substantial costs, time and resources to be carried out. Good planning should take into account the ability to balance these competing factors. Not balancing these factors will likely undermine the capacity (and good will) of people to invest in biodiversity protection. This could generate perverse incentives that act against supporting biodiversity.

The next phase of the review should examine incentives and economic instruments for assisting the maintenance of biodiversity. The discussion document usefully identifies examples of this, for example, tradable development rights. Given the importance of pest management for maintaining the quality of indigenous biodiversity, it is important that incentives are developed to assist this aspect of biodiversity protection. These types of mechanisms should be examined fully as part of the review and should not be limited to a rule-based approach.

Further analysis on removing barriers

The table at the end of the document outlines "barriers to remove" (p. 18). The analysis needs more development. District Plan requirements to obtain resource consent in order to carry out pest control activities (eg to establish walking tracks between trap stations) are serious barriers to biodiversity protection. There are many other barriers that exist.

State of biodiversity and assumptions underpinning the District Plan review

The Executive Summary indicates that development is the cause of pressures on indigenous biodiversity in the district. The document also implicates farming and subdivision in "ecosystem destruction". This logic does not necessarily apply.

Lifestyle blocks involve development, but there can be positive effects from increased indigenous plantings and pest management at a local level. Farming can be carried out in a way that supports the maintenance of biodiversity and it is important that any review of the District Plan supports and does not overtake these facts. There are other significant threats to biodiversity in the district that the discussion document does not mention.

The Department of Conservation (DOC) does not carry out possum control on an area of approx.9000 hectares within the Tararua Forest Park. In utilising DOC's standard practice for monitoring possum levels, results from 2005 along the Park's boundary where no possum control is carried out showed a 60% infestation rate. DOC's Waikanae local office has informed that possum infestation rates higher than 20% mean the indigenous forest is unable to regenerate from the grazing effect of possums. In taking a holistic approach the Council needs to address these areas too.

This poses a significant threat to the district's indigenous biodiversity that is not outlined in the document. A balanced representation of the state of the district's biodiversity should be presented in any documentation on this issue.

Equitable approach to biodiversity management

The discussion document says that landowners should manage pest levels to a minimum standard. It would be inequitable to apply such requirements to individual landowners when DOC - a taxpayer-funded agency that is responsible for much of the district's biodiversity - does not meet such standards. For landowners neighbouring the DOC estate, the inequity would be even greater. The Council too would need to ensure any minimum standard was met on its own land. The Council should take care in avoiding inequitable planning provisions, particularly given the disproportionate burden that some landowners may end up carrying relative to the rest of the District.

Council should lead by example

It will be important for the Council to lead by example in managing indigenous biodiversity on its own land. Kapiti Coast District Council will undermine its credibility in applying controls where it is not managing weeds and pests on its own land. This is likely to be very important along ecological corridors such as rivers where the Council owns adjoining reserves.

Engage with landowners especially those affected by provisions

The discussion document identifies that in order to carry out a holistic approach to biodiversity protection engagement is required with the Regional Council, DOC, OnTrack, NZTA and community groups. A notable omission in this list is landowners. Indigenous biodiversity on private land is a key concern and therefore landowners are an important stakeholder in any protection mechanisms. This is particularly important for those landowners likely to be
affected by the District Plan review. The Council should now be developing a process to engage directly with landowners of habitats that it wishes to protect into the future so as to help forge endurable relationships and commitment to the protection of threatened biodiversity within the district.

Reference information
The Council should be cautious making statements about existing biodiversity protection practices without referencing relevant sources. For example, the discussion document says "that there is evidence that fencing bush remnants increases rat numbers, so that the detrimental effects on biodiversity of this species actually worsen after fencing" (p. 7). The source of this information is not referenced and because of this detracts from the document's integrity. Fencing off of indigenous habitat is often promoted in biodiversity literature and by agencies such as Queen Elizabeth II National Trust.

Further, the statement is not supported by the document's own content which promotes "Rules requiring basic management standards to maintain biodiversity, such as . . . fencing ecological sites; Greater incentives for management to enhance biodiversity, such as . . . fencing, . . . (p 13). Page 14 of the document also says "Ecological sites should be fenced to exclude stock".
### Global Change: Issues and Pressures

Congratulations your planners on recognising the need to include peak oil as a major planning constraint. With the addition of the omitted item below, we see the document as a good assessment of the global situation. Your planning document considers three global issues: climate change, peak oil, and changing population demographics. You have omitted another major global issue which will likely impact the Kapiti region in the future and that is the impending financial crises.

The US is struggling to remain solvent under a national debt of 10s of trillions of dollars, which is likely lead to a world wide depression. The US itself is effectively already in a depression. Stock markets are rising, but real productivity is falling indicating the markets are being artificially inflated, this further evidenced by the insider selling to buying ratio rising recently to greater than 1000: 1.

These factors will spread to New Zealand in the form of lower spending power and increased food prices. Some of the effects on the Kapiti region could be:

- low income families and the elderly struggling financially, widespread mortgage and rates payment defaults,
- emerging tent towns of the homeless,
- a large influx of "financial refugees" from Wellington,
- an increase in crime, and
- an increase on the demand for social services.

Regarding the other three global issues, your document considers two scenarios; Resource Scramble and Managed Transition and suggests a strategy of mitigation and adaptation.

In the case of peak oil, there is ample evidence to show that managed transition is impossible. It will require 10-20 years to develop an alternative to oil, well beyond even the most optimistic peak oil date. Oil is an incredibly energy dense substance and there is no alternative even on the horizon for transport, and nothing comes close as an alternative for other uses of oil. Also, there is an increasing demand for oil as India, China, and Brazil race to match the modern societies of the West. In the case of peak oil, adaptation is the only strategy for us, and the sooner we start planning for it, the better off we will be in the future.

In the case of climate change, the Copenhagen meeting last December demonstrated that the world is not prepared to make the necessary mitigating sacrifices. Even if agreement was reached and every country acted now, the climate change trend would not be turned around within your 10 year planning period. Once again, the managed transition scenario is unlikely and adaption seems the only effective strategy. Any local mitigation measures beyond those already imposed from central government (carbon taxes which are bound to increase) are likely to exacerbate the financial hardship we can expect in the future, and are unlikely to have much effect when the rest of the world’s polluters continue to ignore the issue. We do, however, support the education of the people and businesses as to what they can do to reduce their personal carbon footprint. In many situations, such actions will also help people to adapt to the other global issues.

In summary, we see your "Resource Scramble" scenario as inevitable, where events outpace options for both peak oil and climate change. Sadly, history has taught us that our world driven by individual profit is unlikely to take any action for the greater good or to provide for more equitable sharing of resources. Perhaps Kapiti can lead a new paradigm by example.

### Comments on Landscape Character and Heritage, Biodiversity and Global Issues

#### Larry Paul

**1. The issues are summarised accurately although often rather vaguely.**

**2. Yes this is on the right track.**

**(a) Preserve the section of SH1 between Raumati Sth and Waikanae (or Pekapeka), in particular the bush-lined section between Lindale/Nikau Valley and the Otaihanga Comer -including the Paraparaumu Scenic Reserve and Forest & Bird Reserve - appears likely to become a local road. It should be recognised as an area of high natural and heritage value. It forms a very attractive "green belt." Much of it is in lifestyle block sections, many probably subdivided in the mid-20th Century from Tini Farm. The owners appear to be protecting and extending the bush and tree cover. This acts to absorb water runoff from the eastern hills - an issue that will become more important in the future when climate change brings about more severe rainfall events. Any subdivision into housing developments should either be prohibited or extremely strictly controlled. Paraparaumu is fortunate in having such an area so close to the township's centre.**

**(b) I note that the District Plan discourages buildings on the skyline (ridge-tops). But this is not the reality, with houses beginning to appear on the ridge-line, e.g. east of SH1 between Raumati and Paraparaumu. If Kapiti is to remain a "nature coast," such developments on prominent landscape features should be totally prohibited.**

**1. A rise in ground water level may require relocating large numbers of people now living on low-lying old swampland. Further housing development on such land should be discouraged, and strategic provision made for future housing on higher ground, such as the Tini Farm valleys. Coastal erosion will require a managed retreat from the beachfront.**

**2. Peak oil will not suddenly cause motorised transport to disappear, but will require its more efficient use, in combination with a shift to public transport, cycling, and walking. "Through traffic" will most efficiently use the Western Link Corridor (saving fuel for national advantage), leaving other roads, plus a third Waikanae bridge nearer the coast, clearer for efficient local use. Cycleways and walkways should be developed away from roadways where possible, and/or in conjunction with residential streets and local shopping centres. Total reliance on the Coastlands Mall as a retail centre should be discouraged.**

**3. There will be serious conflicts between preserving Kapiti’s landscape, environment, and biodiversity (dunes,wetlands, bush), and providing alternative housing space to relocate the human communities which are still (inappropriately) spreading across the low-lying farmland and peat swamps,**
While a focus on peak oil and climate change is commendable, you seem totally unaware how peak oil may affect climate change. In particular peak oil is primarily economic in nature and will result in oil prices in the $3 to $5 a litre range in the next few years. Given these price constraints and resource constraints, it is simply not possible to burn the levels of oil that your baseline climate change scenarios indicate. In other words, we are unlikely to see the more extreme of your climate change scenarios with associated sea level rises, that you are blithely indicating because people will simply not be able to afford to use oil at the levels these climate change scenarios need to be modified. There will simply not be the oil available to generate the CO2 emissions assumed.

In most areas you are on the right track, with the exception of the managed retreat ideas. It is a fundamental of property rights that any attenuation/restriction on property owners will result in legal redress and compensation. Any suggestion that property owners cannot defend their property by rebuilding sea walls, or reinforcing their houses for earthquake strengthening or wind hazard purposes are examples that will trigger such legal action.

You have missed 3 things in your discussion on managed retreat.
1) Not all the coastal property is equally vulnerable. Rosetta Rd in particular is elevated in comparison to say Paraparaumu Beach.
2) Raumati Sth is already protected by a sea wall that has protected coastal property along its length. Such protected properties should not have their rights attenuated.
3) The assumptions of climate change in terms of sea level rise need to be modified in light of peak oil. We will simply not be emitting the levels of CO2 that your more extreme climate change scenarios assume.

2. Support them 100%. Initiatives to reduce carbon footprint should be adopted in District Plan. Plan for renewable energy are supported as is the idea of better energy efficiency. Water tank requirement in new houses is supported. Promoting walking, cycling and better public transport should be a requirement of the District Plan.

3. How can the reduction of our carbon footprint be taken seriously when we are planning to build a new motorway through our district. This is in direct contradiction of everything in this discussion document. It will increase CO2 emissions and go against any notion of sustainability. Give support to transition town movement.

1. Excellent presentation of the challenges facing the earth and the Kapiti Coast. You are right on target. If only we could get the Mayor & Councillors onto their bikes to show they acknowledge the problem we are creating.
2. Support them 100%. Initiatives to reduce carbon footprint should be adopted in District Plan. Plan for renewable energy are supported as is the idea of better energy efficiency. Water tank requirement in new houses is supported. Promoting walking, cycling and better public transport should be a requirement of the District Plan.
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The community has given KCDC an undeniable steer that it wants the natural environment to be protected or enhanced. The UN has acknowledged that biodiversity loss is on CRISIS. Please use all resources to ensure that the vision of a "Nature Coast" is not obstructed by the KCDC. Support all measures in the District Plan Review to protect the biodiversity of Kapiti Coast. Buffers must be a requirement of development. Clear standards must be enforced. More support for volunteer groups restoring the degradation of our district. Establishment of broad corridors and the regeneration of native bush should be an objective of the District Plan.

The certain loss of biodiversity that will be caused by the construction of SH1 through the middle of our fragile district. Destroying some remaining wetlands that once enhanced the Kapiti district and a significant part of QE Park. A District Plan that cannot stop this is sad as is Council support for this destruction. Also some remaining dunes will be destroyed. Please do all you can to stop this.

Yes but all the good intentions will be futile if a 4 lane motorway is built. Threatening wahi tapu, wetlands, dunes, historic sites etc.

The community has given KCDC an undeniable steer that it wants the natural environment to be protected or enhanced. The UN has acknowledged that biodiversity loss is on CRISIS. Please use all resources to ensure that the vision of a "Nature Coast" is not obstructed by the KCDC. Support all measures in the District Plan Review to protect the biodiversity of Kapiti Coast. Buffers must be a requirement of development. Clear standards must be enforced. More support for volunteer groups restoring the degradation of our district. Establishment of broad corridors and the regeneration of native bush should be an objective of the District Plan.

The certain loss of biodiversity that will be caused by the construction of SH1 through the middle of our fragile district. Destroying some remaining wetlands that once enhanced the Kapiti district and a significant part of QE Park. A District Plan that cannot stop this is sad as is Council support for this destruction. Also some remaining dunes will be destroyed. Please do all you can to stop this.

The public has given the KCDC a clear direction that it values the retention of landscape character and heritage values that shape the Kapiti Coast. The "Nature Coast" not the "Concrete Coast".

Yes but all the good intentions will be futile if a 4 lane motorway is built. Threatening wahi tapu, wetlands, dunes, historic sites etc.

The public has given the KCDC a clear direction that it values the retention of landscape character and heritage values that shape the Kapiti Coast. The “Nature Coast” not the “Concrete Coast”.

The public has given the KCDC a clear direction that it values the retention of landscape character and heritage values that shape the Kapiti Coast.

The "Nature Coast" not the "Concrete Coast".

The public has given the KCDC a clear direction that it values the retention of landscape character and heritage values that shape the Kapiti Coast.

The “Nature Coast” not the “Concrete Coast”.

Well done, we should adopt the precautionary principle and anticipate a 1.5 sea level rise in as global warming appears worst than previous forecasts. Lessons shall be learnt from the Christchurch earthquake and the folly of building on sand. It seems the height of stupidity to contemplate building a motorway on sandhills with sea level rise imminent.

Yes, managed retreat without reliance on seawalls is in the right direction. Restoration of dunes with plantings of spinifex, pingau etc may help in the short term. The District Plan should include existing buildings and require relocatable buildings.

With the relocation of roads etc from the coast it seems absurd to build SH1 closer to the coast than it is at present. Will the District Plan address this apparent contradiction?

Extremely impressed by the discussion document. Kapiti is in good hands if the Council follow the direction of the paper.

Yes, a forward looking discussion document but concerned about intensive dairying in our waterways. Eels bring them back.
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<td>Outlaw sow crates in Kapiti and stop battery farming of chickens. This is unconscionable in our Nature Coast. Animal cruelty has no place in a modern food production era. Promote Kapiti as organic food production friendly.</td>
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<tr>
<td>139174</td>
<td>Janet Macdonald</td>
<td>INFRASTRUCTURE AND ESSENTIAL SYSTEMS</td>
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<td>Support all measures in the District Plan which will make Kapiti an example of sustainable development. Develop should have low impact on the natural environment and developers should be made to pay for the infrastructure and environment services – the full cost. Yes more or less on the right track. Congratulations and best wishes to get all the environmental protections we can get for the future generations of the Kapiti Coast. We should be thinking of the future we are leaving for our children and grand children – our mokopuna. Strengthening the District Plan should take this into consideration.</td>
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<td></td>
<td>URBAN FORM AND TRANSPORT</td>
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<td>Being a member of a local cycling group my feelings towards sustainable transport, provision of more public transport options, better rail connections, more freight on trains and the provision of cyclist paths and facilities are obviously paramount. Council has been working towards most of these measures, but progress needs to quicken. Council needs to work effectively now so that a transition from motorist to pedal power can be accomplished. Managed transition needs to start now for all aspects of our daily lives. Overseas best practice in integrating transport and land use as shown has some good pointers for Kapiti. Under District Plan Considerations, (page 18), Review parking requirements: Car parking must be limited if there is the will to effect change. Also, the last sentence reads “The review can also look at requiring cycle parking.” Have to say - this is a must situation if all this work is not to be for nothing! A good measure of where we want to be, though Council has identified it to be a critical issue of how to achieve it, is - as you state “…integration between land use and transport, creating places that work for people and are great places to live, work and play.” I see the “Tools for focused growth” as creating the most problem if too much infill housing, higher density, apartment buildings, etc., is a policy that Council follows. The growth management strategy is a tool that looks like it will deliver what is best for Kapiti, i.e. “smart” consolidation, selected “greenfield” expansion and possibly some intensification of rural living in targeted locations such as Waikanae Eco hamlet style. Conclusions and concepts/barriers are supported, though Barrier 1 gives me some concerns about the method to be used.</td>
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<td></td>
<td>BIODIVERSITY</td>
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<td>These concepts are critically important for healthy land and productive use, ecologically and environmentally. Riparian margin setbacks now, now, now please. Agree with all concepts. Barriers to remove actions here</td>
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<td></td>
<td>LANDSCAPE CHARACTER AND HERITAGE</td>
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<td>A key element here is SOS = Save our Skyline. Once this is lost it cannot be put back and can totally change the concept of an area. There are many examples of this along the motorway out of Wellington - Aotea, behind the Police college, Tawa western hillside, etc. Historic/heritage buildings and their surroundings are very relevant to the character and perception of an area. District plan policies and objectives set a basic level these should be strengthened to ensure retention and enhancement of an area's character etc. Plan change 77 district review needs to be managed very sensitively. The confirming and progressing the Possible new concepts/continue and strengthen and Barrier removal will all contribute towards maintaining an agreeable environment in which to live. Regarding the Parliamentary Commissioner for Environment comments. This is so right, quality of soil is paramount. Too much pesticides, too much effluent from livestock in rivers/streams.</td>
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<tr>
<td>139195</td>
<td>(Anonymous)</td>
<td>Ecological best practice needs to be the norm from now on.</td>
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<td><strong>NATURAL HAZARDS AND MANAGED RETREAT</strong></td>
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<td>The Promising new ideas, relocation of services, Recommended approach for the Kapiti Coast and Managed Retreat concepts are sensible, comprehensive and good practice it seems. The Conclusion and concepts/barriers make much sense</td>
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<td><strong>INFRASTRUCTURE AND ESSENTIAL SYSTEMS</strong></td>
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<td>Low Impact Urban Design and Development - has many positive features and should definitely be embraced by Council. Development contributions versus financial contributions. It may be of interest to peruse the Local Government Act 2002 Amendment Bill (142-2) currently being considered by Parliament. District Plan Considerations - water as always is a major resource that needs to be managed and its integrity protected by Council. Privatisation is not an option. Both the need for greater co-ordination between local and regional authorities in respect of this resource and the education of the public in how to better utilise water are paramount. Once again, the thoroughness of Council's overview in this area results in agreement with all the ideas and concepts' put forward.</td>
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<td>139197</td>
<td>Jill Stansfield</td>
<td><strong>GLOBAL CHANGE: ISSUES AND PRESSURES</strong></td>
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<td>Solar and wind power need more developments and used instead of oil. Dams and reservoirs for protection of water need to be explored. Reclamation and draining of land will cause serious problems in the future. Horticulture needs to be extended and encouraged.</td>
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<td><strong>BIODIVERSITY</strong></td>
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<td>No good blaming others for degradation. Importance of biodiversity to our future benefit needs to be stressed in education and publicity. No good protecting without monitoring to prevent further degradation. Increase rather than decrease in areas protected such as wetlands and dunes and forests of native trees</td>
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<td><strong>LANDSCAPE CHARACTER AND HERITAGE</strong></td>
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<td>New development requires careful vetting and should not be allowed to destroy dunes, vegetation. All houses should be built with solar heating and water tanks built to collect water from roof. The sand dunes down the length of Kapiti Coast should be protected and no buildings allowed on them. Native plants and vegetation need protection and wetlands should not be drained. The ecology is precious and should be protected</td>
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<td><strong>NATURAL HAZARDS AND MANAGED RETREAT</strong></td>
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<td>Some issues, ie risk from rise in sea level. Rivers flooding needs to be taken very seriously. It is not a case that may be this or that could occur but WHEN and try to prevent the damage. Strict building codes with sensible distance between hazard and development must be addressed too. Protect wetlands – check for risk of hillside slippage, particularly where when it happens how impact on access by road or rail will be dealt with. Early warning systems need to be publicised.</td>
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<td><strong>FOOD AND RURAL PRODUCTIVITY</strong></td>
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<td>Production of vegetables and fruit should be encouraged. School children should be encouraged to help with allotment and fruit pickings. In the 60’s Scotland still had “tatty hawking” work when boys and girls were given time off to pick potatoes. Kapiti needs labour to pick strawberries and orchard fruit. Horticulture could easily be increased in Kapiti. Camp sites could provide accommodation with food and entertainment in evening.</td>
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<td><strong>GLOBAL CHANGE: ISSUES AND PRESSURES</strong></td>
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<td>What incentives would be used to encourage ratepayers to install micro generation technologies? Basically on right track. BUT the devil will be in the detail. Although extensive comment has been made about peak oil and the possible impact this will have, there seems to be an avoidance of recognition of the potential drop-off in usage of motor vehicles. Will we need to plan for increased or decreased road traffic if we are going to truly focus on being a more ‘self-sustained community’?</td>
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<td><strong>URBAN FORM AND TRANSPORT</strong></td>
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|        |                   | Unsure until we have all the Expressway details. East/West connectivity AND on/off expressway access will be major issues. Many elderly hate having to deal with SH1 traffic – this limits movements and social interaction.  
Partly on track. Public transport will have to be a major focus once peak oil impacts on our district. Need to educate all drivers to be aware of cyclists – near misses are all too common and are often the drivers fault.  
Safe access for the disabled is a human rights issue. It needs to be regarded as a MUST. All the community will benefit regardless of their level of disability or age. Some reference to this need should therefore be included in the “Possible New Concepts” section. |
|        |                   | BIODIVERSITY  
We need to protect viable areas of remnant forest, eg where they are indicative of original forest cover. Monitoring continues to be vital  
I think we need to have very clear guidelines relating to rural land in particular. Need to balance the right for landholders to own/purchase life style blocks etc against the need to protect what is left of our natural environment |
|        |                   | LANDSCAPE CHARACTER AND HERITAGE  
Excellent. I believe my submission re Ngatoto Trig began the change to appreciate landforms differently. Your “Barriers to Remove” are vital to the future of our area. No more “Flat Earth” attitude is needed here.  
It would have been helpful if sites covered by this document had been listed, eg Ngatoto Trig and the reserve area (I presented information that enabled this site to be recognised). |
|        |                   | NATURAL HAZARDS AND MANAGED RETREAT  
In all planning it needs to be remembered that there must be (statistically speaking) about 3,000 disabled elderly in our district.  
Yes, hazard modelling only reasonable way forward – in conjunction with “Managed Retreat” as proposed.  
Slips/small landslides on roadsides of cuttings. Heavy rain causes “slips” even where regrassing has been carried out. Given the climate change problem maybe the angle of roadside cuttings needs to be lessened to be closer the angle of repose of the base material of the surrounding land. |
|        |                   | FOOD AND RURAL PRODUCTIVITY  
Vital that potentially highly productive agriculture and horticultural land be kept for those purposes. Community gardens will help encourage other residents to become more enthused about gardening. Urbanisation of rural land needs very careful tight control. Other gardens should be incentivised if you intend to give incentives to rooftop gardens.  
More emphasis needs to be placed on water conservation because water is linked to food production. Could the roadside berms in residential areas be used for food gardens. |
|        |                   | INFRASTRUCTURE AND ESSENTIAL SYSTEMS  
Issues will be translated into planned actions – then it will be easier to judge whether summaries given have been accurate.  
Education and carefully planned incentives maybe a constructive way of modifying existing attitudes and values. Peak oil will force major changes to our current way of life, use of resources etc.  
There is a dire need to keep all expenses costs budgeting DOWN to no more than the planned rate increases. Wish lists maybe the optimum BUT the reality is that above 40% of rates income is from the elderly – with fixed incomes |
| 131208 | F J Davey         | GLOBAL CHANGE: ISSUES AND PRESSURES  
You mention in table – increased precipitation and intensity but you state an increase in drought and water shortages will occur – why? Whole discussion appears to be current dogma and no critical assessment of the situation and the future. Peak oil is not so well defined as you state – be more critical.  
Scenario planning is a good concept but get your input parameters well thought out and constrained. Good emphasis on sustainability and local focus. Some resilience indicators are strange. Barriers 1 – if you mean wind power state explicitly. Disagree with barriers 2 and 3.  
Expect climate change refugees from SE Asia particularly Indonesia then look at cultural issues. Revise cloned environment speak into plain English. |
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<td><strong>Natural Hazards and Managed Retreat</strong></td>
<td>Lot of jargon without explanation, eg “Test of Reasonableness” without saying what it is. No integrated risk approach, different standards used for different hazards. Probably a major issue is fresh waters questions over flood assessments as there appears to be 4 “100 year” flood events 2 years. Who says the 2 examples are “best practice”. Almost totally focussed on coastal erosion – earthquake hazard only really considered potential active fault traces, not site conditions, eg liquefaction as happened in Christchurch. Adequacy of information – questionable. Active fault study. No assessment of risk as a probability as stated in this document.</td>
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<tr>
<td>131211</td>
<td>Joy Anderton</td>
<td><strong>Global Change: Issues and Pressures</strong></td>
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<td><strong>Biodiversity</strong></td>
<td>Excellent summary. Over the past 11 years my partner and I have spent hundreds of hours trying to get acceptance of many of the principles you have outlined, eg impact of edge effects need to create buffer zones etc. Attached is a copy of the report I wrote to an Environment Court mediation re the wetland at Te Hapua. You may wish to use it as a case study. Yes very much on the right track. I favour ‘carrots over sticks’ but sometimes greed and elevation of economic goals over environmental ones means the District Plans measures have to be robust enough to protect the voiceless, eg natural ecosystems from ongoing destruction. We have witnessed many occasions over the years where the rhetoric has not been matched by action, eg developers destroying wetlands and creating stagnant ponds as a mitigation attempt. So monitoring has to be the key to a revised District Plan with ‘teeth’.</td>
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<td><strong>Natural Hazards and Managed Retreat</strong></td>
<td>All these documents are interconnected of course, but location of major roads near the coast obviously needs to be avoided. Also in this regard, rapid evacuation from high risk zones requires easy access to east/west roads – what’s why the Western Link Road was so good. Yes – it is always hard dealing with widely varied predictions such as the effect of climate change but I agree the District Plan needs to err on the side of caution. The potential for liquefaction along Kapiti Coast in the event of a major earthquake was mentioned but not fully addressed. Have you included wind events such as hurricane etc in the hazard list?</td>
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<td>131212</td>
<td>R Selby</td>
<td><strong>Global Change: Issues and Pressures</strong></td>
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<tr>
<td>139213</td>
<td>Dr Viola Palmer</td>
<td><strong>Global Change: Issues and Pressures</strong></td>
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What would KCDC need to do to encourage the establishment of renewable energy production?

- Planners should be required to protect forests and wetlands, rather than creating new ones.
- Require farmers’ markets to sell only food which they produce in a certain radius, say 50km, as in Whangarei for instance.
- Consider the collection and composting of food waste.

**URBAN FORM AND TRANSPORT**

- Continue the development of walkways and cycleways. In particular build these between residential subdivisions eg between Greendale Park and Waterstone.
- Consider aesthetics in urban forms, eg no houses on the escarpment skyline, and trees to hide 'big box' shops.

**BIODIVERSITY**

- Develop bird corridors.
- Monitor streams for fish and aquatic invertebrates.
- Encourage riparian planting along waterways

**FOOD AND RURAL PRODUCTIVITY**

- Council should have the goal of a GE free district. This would put a moratorium on genetically modified organisms (GMOs) for the next 25 years or until (i) it becomes clear that they are not a threat to the environment, and (ii) there is a strict liability process is in place. If this is not currently feasible it should at least be an objective, and the district declared symbolically GE free, as for instance Waitakere and Northland Councils.
  - There are examples in USA of weeds resistant to the usual herbicides such as Roundup established in the wild.
  - There are also examples in which farmers whose crops have been inadvertently contaminated by GMOs being sued successfully by the company which produced the GMO.
  - The horizontal and vertical spread of GMOs is not known. They could contaminate soil bacteria, insects and birds.
  - Environmental changes produced by GMOs are irreversible.
- Council should encourage commercial organic food production through rates reduction for this type of agriculture and horticulture. Organic production is a service to the community as it reduces soil, air and water contamination, encourages biodiversity, and sequesters carbon. The goal should be to have most of the food consumed, produced locally and organically.
  - c Plant appropriate fruit and nut trees which require little maintenance, in Council parks and playgrounds.

**INFRASTRUCTURE AND ESSENTIAL SYSTEMS**

A precautionary approach should be taken on ground water use, and no further bores permitted. This policy is in conjunction with the Wellington Regional Council.

**COMMENTS ON ALL DISCUSSION DOCUMENTS**

Kapiti Grey Power agrees that there are new pressures on the environment that has changed or arisen over the past decade.

The Review is carried out as one of the Council’s obligations under the Resource Management Act 1991 (RMA) However it is noted that there is also response to the Community Vision in the Community Plan and the Local Outcomes Statements.

Kapiti Grey Power has a concern that Strategies, and there are five in relation to Community Outcomes, don’t have any regulatory status. By their nature, they are unable to be tested through the Environment Court.

Our concerns are:

- That submitters have no right appeal should their submissions not be reflected in the final ‘outcome document.’
- That these strategies are then used by the regulator, and entrepreneurial interests to legitimise subsequent District Plan change proposals that are often biased towards the views of development and/or private capital.

An example of this is the introduction of a freight distribution centre objective in this strategy document which can be seen to align or complement the development objectives of the proposed Parapamumu Airport private plan change.

Developers of the proposed Waikanae North Development Zone similarly used the Waikanae North local Outcome Statement as a legitimising reference in their private plan change proposal. These strategies are still being used by the regulator for reference, to legitimise the District Plan Review in spite of concerns raised on these issues in 2007.
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<td>We agree that there could be significant economic, environmental and social impacts for residents as a result of Peak oil and volatile energy prices impacting on the District, perhaps the comments on the future of new technologies, alternative fuel use, and changing life styles can be more positively stated and strengthened.</td>
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<td>The causes of climate change are well set out, such as the concern regarding the increase in CO2, and the Greenhouse Gases table.</td>
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<td>Aviation flights cause large carbon emissions but there doesn't appear to be any mention of the future uses of the Kapiti Airport. The converse to this is the provision of local jobs in the Airport precinct.</td>
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<td>Sea Level Rise: It is noted that accurately determined satellite orbits have provided improved measurements of global sea level change. The latest stated projections are 'that sea level may rise by up to 1.5m by 2100 in New Zealand'.</td>
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<td>The issue of immigrants and refugees for New Zealand and Kapiti Coast will inevitably arise, but experience of Wainuiomata Refugee Settlement Committee demonstrated that after an initial start in a smaller town, refugees moved to Wellington or Auckland. The reasons given were that the people were used to living in larger communities, preferred city life and being close to amenities and entertainment. This could be the situation for Kapiti, but that does not mean some form of planning for larger refugees numbers should not be made.</td>
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<td>Possible global change scenarios for the Kapiti Coast. Having 40% of the work force going out of the District to work, and the 'distortion' of local jobs being in the construction or retail, with almost double the national average of elderly people, creates vulnerability to impacts of global pressure. In the future this could change.</td>
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<td>The development of Waikanae North and the Ngarara Settlement may bring in an influx of younger families with children. The double tracking of Rail and the more frequent timetable of new trains to Waikanae could result in more families wanting to live on the coast, due to easier access, for which planning is required.</td>
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<td>Two Scenarios have been considered. In Scenario I we have 'Disruption from 2012 peak in conventional oil production.' Is this 2012 a realistic time frame considering we are almost at the end of 2010? In Scenario 2 the same time frame is mentioned. We believe that scenario one is scare mongering.</td>
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<td>Kapiti Grey Power supports Council's overall approach to have a managed transition through mitigation and adoption. This will lead to a range of possible futures, rather than a single 'forecast'.</td>
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<td>The section on Economic issues recognizes there will be less money around, a slow down in local economy, higher unemployment, increased rates and people's inability to pay mortgages, leading to higher arrears and defaults. The Social issues are not as well covered, but the impacts related to oil costs are. The deduction is that peak oil is a driver of development decisions in the Plan. It maybe, but surely some acknowledgement of people's inventiveness also needs to be acknowledged? Programmes on TV have shown vehicles propelled by bio fuels, electricity, hydrogen, and, in one case, water.</td>
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<td>Environmental issues are well covered.</td>
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<td>Recently in September the water supply issue for Kapiti was solved for the next 50 years, and some recognition of this future access to water sources in Kapiti is needed. Text needs to be revised.</td>
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<td>Council has already started to encourage people to use economy light bulbs, insulate houses, the use of solar panels. Some Councils with the help of electricity providers, convert waste at landfills into energy. The district can be open to new technologies by helpful measures in the District Plan to encourage their development, instead of red tape that can cause delay in production.</td>
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<td>Council can consider opportunities to have 'power points' as well as natural gas and 'bio-fuel' pumps at service stations. These will of necessity lead to new rules in the District Plan.</td>
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<td>The District Plan is a key tool to manage subdivision and development in the district. There are permitted uses and areas where development must be carefully controlled. The RMA states that the impacts of climate change, the efficient use of energy and the benefits of renewable energy need to be considered when making District Plan provisions.</td>
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<td>The comment on p 12 regarding the 'current distorted population structure in the District will potentially decrease the capacity for resilience' needs to be reconsidered. Over the next 10 or so years of the Plan, the demographics of the District will not necessarily remain the same as the current figures. The impact of new developments at Waikanae North and Ngarara Settlements need to be factored into future planning.</td>
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<td>Best practise response and potential District Plan actions are well thought out but the people must be widely consulted on 'concentrated intensive residential development' around shops, services, and transport system as problems such as noise, lack of privacy, and overcrowding could occur. There are also problems regarding insensitive development, blocking view shafts of Kapiti, the height, scale of development, loss of vegetation that can impact on the low density urban form that is by Kapiti residents.</td>
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<td>There are a number of good suggestions for long term development, but people cannot be made to take up the opportunities that can be created. Apparently some of the comments are based on a 50-100 year period, there needs to be some attention paid to the 10 year life of the Plan.</td>
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<td>Non-District Plan mitigation and adaptive actions gives some radical proposals such as 'geo-engineering' techniques ranging from 'carbon sequestration' to the creation of 'stratospheric sulphur' aerosols. The comment that these are 'still largely theoretical and have not been properly assessed in terms of environmental negative side effects' makes one wonder why Kapiti would be at all interested in these until they have been properly assessed. Currently most people haven't the discretionary money to pay for Council's needed core services and well being items, let alone paying for unassessed theoretical items.</td>
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<td>Kapiti Grey Power supports the actions outlined on p 15.</td>
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In Sustainable Forestry care must be taken in planning for harvesting. Roads in the residential areas could be damaged, and safety compromised. Eg Maungakotukutuku Valley where residents are worried about the number of logging trucks passing houses, and road safety. Provisions for traffic management plans, stop-go controls, signage, and hours of operation will be required in the District Plan to safeguard residents from noise, and nuisance. How will the trees above the railway tracks in Paraparaumu be harvested?

If sustainable forestry is allowed in urban areas then the areas need to be clearly defined. The block of trees between Leinster Ave and Mata Road obscures views and floods the area with pollen which causes health problems. There is the issue of wilding pines, and provision must be made for logging trees and moving out of areas.

Kapiti people are resistant to high density housing. This needs full consultation.

Do not remove height controls from houses and other buildings.

Home occupations need measures to mitigate noise, nuisance, and nosy activities.

Yard requirements, needs to include space for amenities such as children playing in yards, clothesline, small garden sheds in standard residential yards.

Support mixed housing options including Abbeyfield developments.

**URBAN FORM AND TRANSPORT**

This discussion document relies heavily on the Development Management, and the Sustainable Transport Strategies. Usually a Plan directs the Strategies, but in this Review the Strategies direct the Plan.

The Wellington Regional Strategy is also a reference for the Review. This is a non-statutory document that was out for consultation in the Region using the LGA. If required I will provide the submissions Kapiti Grey Power presented to the KCDC on these Strategies in 2006, and 2007.

Kapiti Grey Power supports the information in the Summary.

The current package of growth management tools, include intensification that has not received favour from Kapiti Grey Power. There is reluctance in the community to accept this which can be done insensitively.

We agree with the definitions and answers provided relating to urban form.

A comment regarding the responsibility of the Greater Wellington Regional Council to provide Public transport should be provided.

Is it necessary to give the 88% walking statistic for Tokyo's Travel modes as an example? The environment and the culture are entirely different. Where are the Kapiti statistics of people walking to work? Have any surveys been conducted recently? Perhaps the Census Origin and Destination methods of travelling to work could be used?

We agree with the comments on Freight and trust the effects of traffic volumes and new regulations relating to length and weight of trucks will be taken into account when dealing with the Airport traffic impact on Kapiti, and will be included in the District Plan, as well as the Aviation fuel effect on carbon emissions.

The opportunities and challenges of growth are agreed, especially the key question of how to get the benefits of growth while minimising its negative effects. The last paragraph on P6 has ‘35% of workers commuting out of the District to work’ The Global Changes section has 40%. Consistency is necessary in the documents.

Kapiti Grey Power completely support the concerns regarding significant impact the proposed Expressway will have on District form, local centres, local road networks, naturals features, view shafts and environment.

Wellington City Council abandoned the In-fill approach. Perhaps this can be checked before exploring the potential to target intensification that will be part of the development focus.

Kapiti Grey Power supports the statement that all new development in the District needs to respond to landscape and ecological constraints and avoid natural hazard prone areas.

Of the 3 main conceptual approaches: 1) None; which is no management; 2) No-growth at all; 3) known as Focused growth is considered to be the most sensible. It can be used with other options to formulate a growth management package.

The key questions are how much rural living to allow where should this occur, and in what pattern? Lifestyle blocks meet the need of some peoples’ requirement for semi-rural living, to keep some stock, grow fruit trees and vegetables and to be close to town for children's education and civic amenities. There are rating issues along with this for example the ‘Rural Village’ rating system has increased rates in the selected areas without any increase of amenities, with poor access to services, no pavements, or lighting, and no school bus routes. Some areas of the Camelot Subdivision and Greendale Park have residential rating and yet are similar to lifestyle blocks with poor access to services.

The definition of ‘Anti-sprawl says that any development is compact, well-connected and linked to public transport, housing choice, fits with the landscape, providing social and economic services, and demonstrating low impact environmental design is supported.

Other cities in New Zealand have used and experienced these methods, surely Hutt, Porirua, and Wellington Cities have examples of various ways of best practice, which will be relevant to our culture, transport etc. Why
are overseas examples always used?
Criteria for evaluating growth management options are supported. Safety is used in a narrow fashion. An additional comment could refer to people wanting to feel safe in their houses and neighbourhood. In Environmental sustainability growth management needs to acknowledge 'quality of life'.

The package of growth management components should not contain solutions from other parts of the world. There are good examples in New Zealand. Whilst agreeing with 'smart consolidation in existing urban areas, as already stated we have concerns about what could be insensitive controlled in fill and targeted intensification. What about information on Auckland region and Wellington City examples for integrated transport?
Having said that, it is good to read that Kapiti’s vision seeks to implement the Wellington Regional Land Transport Strategy.
The desire to increase connectivity between and within communities has been expressed yet again. We do not have a second vehicle bridge over the Waikanae River after years of asking for one.

How will a reduction of fossil fuel use be achieved in the future? Surely this is beyond Council’s control. Kapiti Grey Power supports integration of public transport that facilitates the use by the older citizens, people with impaired mobility and families with young children.

NZTA Expressway will provide an alternative to reliance on SH1
Most of the district Plan considerations are accepted, intensification needs careful handling, and the GW responsibilities need to be acknowledged. However, p6, 2nd paragraph in ‘Provide for rural buffer zones or greenbelts between settlements’ Kapiti Grey Power does not support Council purchasing land for open space protection. This can be done by way of development contributions. Neither do we support purchasing development rights, thus paying landowner not to develop. The rates increases already forecast in the LTCCP, without these kinds of purchases, are too high and unaffordable.

Does Infrastructure Planning that supports the growth management vision mean Council would spend capital dollars on infrastructure where it wants growth? Council gets its money from ratepayers, and capital is raised by loan, usually over 20 years repayment period. Kapiti Grey Power requests clarification of this statement that could add extra loan repayment on the rate payers.
We-agree in principle with conclusions, but reiterate the concern that has been expressed about the Strategies directing District Plan.

Strategies should conform to District Plan. The impact of the Expressway, or the increase in train use due to Waikanae double tracking of rail is not discussed, nor the impact this will have.

Work with GW to integrate transport.
Not happy with target intensification
Preventing cycle or pedestrian barriers does not protect owner of property or fence from nuisance caused by pedestrians or cyclists. They also have rights and get frustrated.

Who will pay for this? Ratepayers again? The Economic Development section costs in the LTCCP are high now.
The current Town Centre zoning needs to be sorted out with the Ngahina Trust.

BIO DIVERSITY
The definition ‘Biodiversity is central to what sustains us: it is the life on which our lives depend’ is accepted by Kapiti Grey power.

Is there data to substantiate records existed on NZ land and fresh water species 700 years ago? In the local context the scale and diversity loss following European settlement is given.

Will KCDC continue promoting itself as ‘Nature Coast’ over the 10 years of the Plan? People in the local press have been querying this name. October 18th 2010, in the Observer Mr. Dougherty says the new Welcome signs for the district for SH1 will specifically refer to Kapiti Coast. Some clarification is needed.
The problem that Kapiti needs to address is biodiversity decline. Whilst the District Plan manages effects from land use and is somewhat limited in its’ ability to reverse the trend of decline, there are things that can be done as discussed in Risks and threats. Protecting significant areas of native vegetation is required by the RMA and prevents deliberate destruction by people. Page 7 includes a good example of how biodiversity can be reduced. The District Plan is a tool which can be used to manage land use and is supported by Kapiti Grey Power.

The monitoring of biodiversity by central, regional and local government has been inadequate to date, probably due to lack of funding. Greater Wellington conducts species monitoring on its’ own land.
In Kapiti there three management incentive schemes that have been fully utilised, with $48,000 in the 2009-2010 LTCCP for incentives to sites, maintain or enhance biodiversity. Kapiti Grey Power supports these initiatives for improving biodiversity for the Kapiti District. The monetary value may not be large, however, the District Plan in its’ responsibilities must be careful not to add costs on top of the LTCCP rate demands.

The National Biodiversity Strategy published in 2000, was reviewed in 2005. Surprising, this review noted the lack of data to enable comparisons between 2000 and 2005 and called for standardised monitoring and reporting systems. This is rather amazing when the data back 700 years is available

Proposed Regional policy Statement directs local authorities through objectives and policies that are supported by Kapiti Grey Power.

Kapiti Grey Power participated in the review of Outcomes 2009, and supports the approved document. Comments have been made about the ‘Nature Coast’ promotion, and should the more relevant Kapiti Coast be used.
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Active engagement with other agencies is noted for all aspects of planning policy, robust monitoring and compliance programmes to ensure that the benefits of growth and use of physical resources do not come at the expense of biodiversity.

Best Practice approaches consider what is done in other Councils; the ‘greening’ of Waitakere City (now part of Auckland) is featured, as well as Western Bay of Plenty District Council. Transferrable development rights allow for a system of transferrable bonus development rights for native vegetation protection. These can be bought off third parties. This needs careful consideration before being introduced in Kapiti.

Regulatory versus (note wrong spelling in document) non-regulatory measures. In other Councils coercive regulatory measures are balanced with compensatory incentives to gain understanding and cooperation. The Western Bay of Plenty District Council has incentive measures such as a fencing subsidy funded from rates. Whist options such as these may be worth considering for Kapiti, the demographic make-up of our district needs also to be considered and the proposed level of rate increases in the LTCCP. Many senior citizens and others on low incomes are struggling to pay rates now.

What is currently in KC District Plan this section outlines a common compromise to manage development to minimize damage to biodiversity, and impose restrictions to mitigate or off-set damage that occurs. Two examples are given of the potential effects that the District plan has on biodiversity. Mitigation problems have occurred and are recognised on page 12. Suggestions regarding the quality of mitigation, and how it can be achieved by clear objectives, and at the expense of the developer to ensure they are met. This is supported.

Plantation Forestry section outlines a threat to biodiversity by the harvesting of the Pinus Radiata forests. It is up to Council to ensure the requirements and consents are appropriate to protect and maintain the biodiversity of forests and to make sure there is adequate monitoring and compliance.

Whilst Kapiti Grey Power agrees with the list of comprehensive information gathering for monitoring, it is noted that this is subject to funding, and time. On the list is a review of community attitudes. This is important because of the small number of submissions made on the Outcomes 2009. It cannot really be assumed that the biodiversity protection is highly valued by the residents of the Kapiti Coast.

The corridors and catchments, it is stated, could benefit from integrated management, and identified as an ‘ecological network’. Consultation with owners is necessary especially the corridor between Kapiti Island and the Tararua. The people in the Greendale Park development should be told of District Plan proposals.

Kapiti Grey Power is believes that the payment of incentives is an acceptable policy when the community is able to afford it. Superannuitants will be unable to afford to live in Kapiti if all these rate funded measures are pursued at this time.

On page14 beyond the District Plan states the current Riparian Fund incentive scheme could be enlarged and funded by rates. This is unacceptable when there is the alternative of collaborating with other agencies and dairy companies to run an incentive programme.

District plan Objectives p14-15 These are mostly supported as is including biodiversity outcomes for key habitats and ecosystems. The concept of consideration of an ecosystem services budget regarding consents, needs more detailed work, and may be for larger developments only. Rules and Standards various strengthening of provisions with other issues need to be looked at in further details. The keeping of bees if going into the District Plan, text will need to comply with recently approved Bylaw. Forestry p16.Agree with comments, but once again rates relief, transferrable development rights, advice and assistance with costs needs careful consideration because of the huge proposed increase in rates in the LTCCP.

Coppicing is an interesting concept which could be included in a review of the current forestry provisions, and be another tool for protecting biodiversity on the Kapiti coast. Whilst ‘harvesting in sections’ is suggested, removal of the trees will need rules to protect the roads and safety of residents. The noise, speed, nuisance, operation times and number of trucks travelling through residential areas will require some mitigation provisions.

Comments are made on the QEII Trust and its successful work. The problems with the Trust’s stewardship namely lack of funds, and the opposition to covenanting are discussed. Perhaps extra Government funding should be sought to increase and support the good work done by the QEII Trust.

The closing statements say that it is up the community to make decisions about what we value, and to protect indigenous biodiversity.

Because of extra costs that can be imposed upon rate payers, the measures proposed for the District Plan Review requires consultation in the wider community not just with those who lodge submissions. Perhaps the Community Boards can arrange consultation evenings as done regarding the water supply consultation.

Summary with the main biodiversity ideas
Keeping of Sees in urban area supported To comply with approved Bylaw. Do not support ‘Transferrable development rights’
Ecosystem service budget: Not to be funded from Rates.
Kapiti Grey Power agrees with statement that the landscape, character and heritage values are coming under threat from development that is not sensitive to the existing landscape, character and heritage values, particularly in new urban expansion areas and infill.

The paper presents a number of proposed directions for discussion with the aim of identifying, and protecting values. The list provided is supported by Kapiti Coast Grey Power. Issues, Challenges and Trends. Are well set out, the information is accepted.

Should not the beach be considered as a natural resource? Significant issues relating to the protection and enhancement of landscape. Character and heritage values are listed.

Protection of highly visible and sensitive landscape: The siting and scale of development can visually impact on the quality of the landscape beyond the immediate locality. For example the high, white house on the skyline in Paraparaumu. We agree with the comments regarding development needing to fit in with the landscape, rather than stand out. Lakes Council requires that buildings are painted to fit into the landscape.

Cumulative impact of individual developments on landscapes and character: recognises that many developments in Kapiti only have minor effects, however as further development occurs there is a gradual change which results an overall adverse impact on the landscape and character values.

Kapiti Grey Power agrees that cumulative individual developments and subdivisions have an impact on landscapes or character. It is important that this is recognised and ways are found of ensuring that there is a positive impact. Limited physical and visual access to landscapes: The comments regarding public access, view shafts regarding Kapiti Island, and low density urban form are appreciated. Many view shafts will disappear with the construction of the Expressway. Controls on those remaining must be strong and not susceptible to court: action or Plan change.

Insensitive subdivision patterns and density: Comments are supported, as are the ones in Promotion of sustainable working landscapes.

Protection of special character areas: There is a concern that new development in these areas will lead loss of local identity and sense of place. It is encouraging to read that Council is undertaking an urban character assessment in Raumati. The current District Plan does not protect special characteristics of various areas, but there is recognition that inappropriate development may result in the loss of valued neighbour character. Kapiti Grey Power recommends that some form of protection conditions be devised to preserve what is of value in the different localities.

Insensitive infill development: We completely support these statements regarding insensitive infill development. The examples given reflect all of our concerns regarding this type of development which can adversely affect a neighbourhood's character and sense of place.

Urban indigenous vegetation clearance and the Loss of distinctive landform: Clearly set out the problems that insensitive development can cause, and the significant visual impact on urban vegetation. Distinctive landforms need to be preserved from being adversely impacted by earthworks in new subdivisions, and other developments that can change the character of an area over time.

Subdivision of Heritage places: The comments are supported, as a Heritage value and place can be lost by the impact of insensitive subdivision. Perhaps a way can be found to protect heritage places and their surroundings

The Acts and Policy statements landform, character and heritage are given. The Regional policies require the local councils to adopt the policies and objectives through their District Plan to identify and protect the landform, character and heritage. This will give some weight to the District Plan for the future.

We disagree with the statement 'The District Plan Review should be guided by the policies set out in the Development Management Strategy'. This Strategy is not able to be tested in the Environment Court. We believe that the Plan should guide the Strategy, so we have a fundamental difference on this unless it is also subject to review.

There are specific objectives in the District Plan to protect landscape and Heritage. However there aren't any specific objectives to protect character. There are objectives set at a basic level for identification and protection of landscape, character and heritage. We agree that these are strengthened to protect their values.

Specific provisions in the operative District plan for protection these are listed and supported by Kapiti Grey Power. There may be ways of strengthening them.

On page 12 the details of the Rural Subdivision Guide is featured in a coloured box. The guide was published in 2009 to encourage best practice and ensure the qualities of the Kapiti Coast rural areas, and landforms are maintained and enhanced.

In the 10 years since the current District Plan became operative it has become clear that the 8 original zones do not recognise the full diversity of character within and specific to the Kapiti communities. The Local Outcomes across the district: identify unique local characteristics, but these values are not in the District Plan.

Council has been addressing urban character through Plan Changes, Proposed Change 77- Otaki Density Review will help to retain the low density character of Otaki.

The Council's approach to future urban development, as outlined in the Development Management Strategy, is through targeted urban expansion, and infill development. Insensitive infill development can have can have a negative impact on the urban character of a developed area. This is not supported, as previously stated.

The District Plan identifies Heritage Places on the District Plan Heritage register, within 6 listed categories. Whilst subdivision of properties with historic buildings must consider the impact on heritage values, other listed heritage values such as ecological sites, or wahi tapu do not require values to be considered. It would be helpful for a statement regarding protection for Urupas and wahi tapu be included in the Review. It is encouraging to read that further research on wahi tapu sites in conjunction with iwi is being undertaken.
SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

Recommended approach for the District Plan: The list and some approaches given are supported by Kapiti Grey Power such as: Identification; Protection of identified features from inappropriate subdivision and land uses; and Strengthening existing provisions.

Allowing average, not just minimum lot sizes, for subdivisions to provide for generally low housing density characteristics, could be abused and will need careful monitoring. There are some reservations about this new approach that causes concern.

We support the requirement of development to be sympathetically located and scaled in highly visible landscapes.

We support identification of 'no build' areas at subdivision stage so dwellings are located away from high gradients and ridgelines and screened to minimise the impact on visible ridgelines. The other approaches as featured on pages 16 and 17 are supported and agree that the provisions should not place an undue burden on home builders; a level of flexibility is accepted.

Kapiti Grey Power accepts the proposed approach in the Review to build on and strengthen existing policies, as are listed. There are some reservations about the new ideas listed in the previous section, on which comments have been made.

The green summary table with elements of the proposed plan is generally accepted, Kapiti grey Power's reservation about some provisions have been given. We believe that there should be recognition of each area's individual Community Outcomes.

FOOD AND RURAL PRODUCTIVITY

This land is a resource for the community in the event of a gradual or sudden shock to supply systems. Recent changes to the Plan have promoted the concept of clustered residential development in rural areas to allow for larger and more balanced productive lots. In order to promote a diverse network of food-producing activities, a number of new ideas for consideration, and discussion are presented.

Kapiti Grey Power generally supports the list but will make comments on various ideas. For example ‘Allowing a range of residential lot sizes as well as community gardens in urban areas.’

Community Gardens could be on reserve land. As there are lease charges where reserves are used for sports etc. a price regime will have to be considered that is affordable to a small group of volunteers without any funding. The examples being $1 for the Menz Shed, and a community garden lease given recently. Allowing reserve contributions to be spent on community gardens, food forests, and other food producing reserves will need to comply with the Reserves Act for purposes that Reserve ( contributions are made.

The global picture looks at insecurity of energy supply and increasing population growth putting pressure on global food supplies with implications for Kapiti. Kapiti's food supply is regarded as being potentially at risk and vulnerable to political disruptions and trade blockages, fuel price increases, with increased costs of imported food. The concept of resilience is defined, as well as what being a resilient community in terms of food means.

This makes interesting reading, not just for food production but for many of the other things that Kapiti families need ranging from clothing and energy to health care. Rural and urban areas can provide land for trees to be planted as carbon sinks, to prevent it from contributing to climate change.

Current productive capacity is discussed with a map showing the potential horticultural uses in the northern part of the District which is much higher than its current use. The 2005 research team estimated that pastoral and dairy farming could increase its productivity to some degree without limiting the expansion of horticulture.

There are a number of trends negatively impacting on Kapiti reaching its potential in terms of food production. These have been identified as a result of community consultation on the LTCCP and Community Outcomes. Kapiti Grey Power shares some of these concerns especially about uncontrolled infill development across all residential areas limiting the potential for backyard vegetable growing.

The community wishes to protect its low density, as well as low rise, character in most areas.

Urbanisation of rural land is discussed. While urbanisation is perhaps inevitable, it does reduce the food producing ability of the land considerably. Urban land is divided into smaller lots than rural land, but in many cases big enough for a small vegetable garden and may be fruit trees. It is disturbing to read that some housing development at higher than usual densities, like row houses, apartments and other medium density housing may have no back yards for growing food, aside from the occasional balconies, patios, or potted herbs or vegetables. Kapiti Grey Power we concerned about these in development in our submission on the Urban Edge Plan Change.

There were 400 new lots (lifestyle blocks) created in the rural zone during 2000-2008. It is doubtful that lifestyle blocks are very efficient food producers, in fact they probably reduce the overall quantum of food food produced.

Changes in uses of rural land include the increasing demand for rural land to be used for non-farming activities such as infrastructure projects that involve buildings and roads, wind farms, hydro dams for water supply, or new Expressways as part of the national transport network. These conflict with food production potential in the zones.

Whilst the paper recognises there are many productive uses of rural land, it has a concern for soil quality, because quality soils are a finite resource.

Rural skills base. We agree that the viability of the rural productive sector is not solely dependent on the land quality, but also on the skilled labour force who work the land. The comment is made about the decrease in the number of people who make their living from growing food.

There is a resilience indicator mentioned that measures the percentage of teenagers that can successfully grow 10 types of vegetables. The question can be asked here in Kapiti who still knows how to grow or raise
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- **food?** This can be answered by asking the Paraparaumu Beach Primary school pupils who last year were taught about vegetable growing, and still some do. The comment that "If Kapiti is not only able to produce raw food, but also able to turn it into chutneys, meatballs, veg chips and other things that people like to eat this could increase the number and variety of jobs available locally" has an ironic ring when one considers the markets and stall holders who were put out of business because of the heavy handed imposition of food and health regulations.

- The Role of District Plans is to specify lot sizes, and to give guidelines as to the types of activities permitted in different parts of the District. It protects land in the 'right size' in the 'right places'; this includes resolving tensions between minimising the expansion of the urban footprint into rural areas, and allowing some capacity for food production in households, and at a community level. Kapiti Grey power supports protecting the food producing capacity of rural land by Council avoiding heavy handed regulation in this sector.

- Numerous possibilities can be explored with the aim of encouraging a diverse, resilient network for food production in Kapiti. Some key ideas are listed and can be supported such as:
  - Strengthening and clarifying objectives and policy relating to food and soil capacity using stronger and more explicit policy language relating to residential areas that could promote a range of lot sizes to allow urban gardening.
  - Further clustering of any residential development in rural areas: the concepts already in the District Plan’s Coastal Dune policy area would need careful evaluation to be used in other parts of the rural areas.
  - Retaining/ expanding lot sizes on the most productive and versatile soils. This recognises that some soils may be too valuable to have anything like clustered residential density development on it. For some valuable parts of the Alluvial Plains (not Plans) the maximum 4ha minimum with 6ha average could be retained, or increased.
  - Allowing farm worker housing in rural areas to support the productive sector is supported. As is Addressing reverse sensitivity issues through careful clustering and buffer zones.
  - Allowing a range of residential lot sizes and community gardens in urban areas. Already there is a range of lot sizes specified in the current District Plan; there needs to be resolution of creating smaller lot sizes or medium density housing that may impact on the ability of the householder to grow some of their own food.
  - There could be smaller lots for retirement villages with open space to be used as a communal garden instead of separate ones. A form of clustering perhaps?
  - Whilst Community Gardens are not restricted if they are on public land, the lease of reserve land is expensive, and a policy needs to worked out regarding community garden use of reserves.
  - If an owner of a large residential section is prepared to allow some of the land to be used for a community garden, then we believe that an explicitly permitted activity subject to certain standards can be allowed. Kapiti Grey Power supports streamlining the process for keeping bees and poultry in urban areas. The current District Plan requires resource consent for this activity, but the new Bylaw allows bee keeping and poultry as long as they don’t create a nuisance. This needs to be worked through.
  - Allowing reserves contributions to be spent on acquiring land for community gardens needs careful consideration. First the Reserves Act governs reserves contributions; secondly the Community Boards need to be consulted regarding the needs for extra sports fields and reserves in their area.

Care should be taken with planting on road reserves due to the possible lead contamination.

### Infrastructure and Essential Systems

The text on page 5 poses 2 questions giving good answers, especially regarding the impacts of infrastructure on the quality of life. The only question is can the District Plan achieve what is claimed in this section? The primary, secondary and tertiary principles for implementing the Low Impact Urban Design, although ambitious are supported.

- Broadband: Currently Telstra Clear provide a good, high speed service in Kapiti. Smart Phones including Androids, are available, as well as other new technology, such as Mac Book, or note Book. The providers need to be encouraged to work together in the development of a National Environmental Standard that can be featured in the District Plan.

- Who pays for growth? KCDC has to decide whether and to what extent it will provide new or upgraded network infrastructure or community facilities to keep up with the demand created by new development, and who will fund the cost. Some options are provided giving the financial measures in the various Acts, however, these only fund in part and ratepayers will pick up the remaining capital costs. Kapiti Grey Power does not support the removal from the District Plan of financial contributions taken as conditions of consent under the RMA for reserves.


- Will the District Plan contain comments on Council’s chosen River Recharge Option for water supply?

- The current District Plan provisions are well set out including various Plan Changes, Comments are made on the many shallow bores around the district and the effects unlimited access to these water supplies would have. Page 10 Council approved a Water Conservation Strategy on September 30th 2010 which could alter some of the comments in this section.

- Council works to the levels of service for protection and supply of the infrastructure it provides as agreed in the LTCCP. Changes to the agreed level of service, or the way services are provided can alter the planned capital expenditure programme significantly impacting on the cost of growth which can increase the rate burden.

New ideas and possible improvements need to work towards smarter ways of carrying out activities and holding, or reducing costs:

- For mitigating and prevention of increased storm-generated flows and pollutants as a result of urbanisation is part of the current District Plan.
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<td>To achieve the objectives in the paragraph regarding mitigation five principles are required to be adopted. The last one states that public ownership of Stormwater infrastructure including secondary overflow paths is encouraged. Does this means that the maintenance will paid for by rate payers? A list of 13 possibilities that could be explored as part of the District Plan Review is given. Some ideas give alternatives such as ‘incorporate’ or ‘adopt’. In the next round of consultation one or the other needs to be chosen after staff members have decided which best fulfills the Plan’s objectives. The document comments on new standards that have significantly changed the emphasis on how Councils should manage storm water and transport. These include use of low impact urban design features, such as grassed swales, natural or artificial waterways, ponds and wetlands; as well as reinforcing requirement to consider climate change and potential sea level rise, It is Council’s intention to adopt NZS 4404:2010 giving specific design information where Council requirements differ from those in the standard. No doubt the District Plan will be changed to accommodate this? Regarding the NES for Telecommunication Facilities, there is acceptance the locations of power lines, transformers and cellular phone base station within the residential zone, especially in close proximity to schools, creates anxiety among local residents due to possible public health implications of exposure to electromagnetic exposure. Kapiti Grey Power expects the Review to look at ways that some stringent, protective measures can be imposed. There is recognition of the impact: facilities such as cell phone towers and associated infrastructure can have on amenities so the regulations &amp; allow the District Plan to include some more stringent rules. We emphasise that the Cell phone tower rules need to Be carefully considered and some more stringent ones set We are also concerned that the proposal to remove barriers for renewable energy is done with due consideration for landscape character Kapiti Grey Power suggests that the District Plan needs to adequately address how soil contamination is managed and adopt a separate activity standard. Kapiti Grey Power supports the comments regarding the Trade Waste Bylaw and suggests the District Plan reference the need to treat and discharge Trade waste to an acceptable standard, thus avoiding any noxious waste having adverse effects on the environment. Kapiti Grey Power sees waste management planning as a separate activity in the District Plan A requirement for carbon accounting and reduction plans can be adopted as a separate standard in the district Plan including the items listed in the section. Kapiti Grey Power agrees with the comments in number 10 such as ‘any development should aim to minimise the increase in the frequency at which the pre-development discharges are exceeded. Kapiti Grey Power supports a code of Practice for Grey Water Dispersal Systems and Rain Harvesting tanks to allay the public health concerns regarding its’ re-use. Generally we think you are on the right track.</td>
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<td>In the Executive Summary the importance of being “a good place to live is noted and thus implies that Kapiti fits this description. This is surely so. It is undoubtedly an attractive rural seaside place to work (or retire to) and yet is close to Wellington. For many Coastlands meets all their needs to sustain life. For us, Raumati South could not be better. Managed growth – Page 11 considers this topic and cover the subject extremely well. Having lived in the Netherlands we are familiar with the suburb of Aalsmeer situated south of Amsterdam. It provides an excellent example of controlled development by including high rise constructions (mostly office blocks) interspersed with low profile buildings, ample grassed areas and (being Dutch) plenty of water to create a pleasant living/ business area. In a region which offers plenty of scope for future growth the style developed in Aalsmeer may be worth consideration for Kapiti as pressure to expand develops over time.</td>
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<td>I think rezoning of rural blocks that have become surrounded by urban/residential land is important. Owning one such property, 14 Te Rauparaha Street Otaki, I have been subjected to reverse sensitivity. Surrounding residential properties seem to feel it appropriate to use my land as a refuse tip for their green waste, I have had problems with animals being harassed, I have had complaints about cattle beasts mooing (quite a natural occurrence that is difficult to stop!), and managing stock during fireworks becomes increasingly impossible as more of the surrounding land becomes developed. As keeping stock on such 'rural' land becomes increasingly difficult I think priority should be given to rezoning such blocks as residential before allowing further urban sprawl.</td>
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**FOOD AND RURAL PRODUCTIVITY**

We are in agreement with KCDC's review of Food and Rural Productivity. We believe it is important to remove barriers to people growing and producing their own food be it in a community garden, food forests or commercial scale. We all benefit from it.

From our perspective recognition of intention to implement sustainable practices and food production should be considered under subdivision and building consents particularly in rural zoned land. Smaller lot sizes do not necessarily mean less productive land use. Through the use more diverse range of food crops and sustainable organic agricultural practices smaller scale use can and should be more productive, resilient and beneficial to the environment especially with regard to water use and quality.

Where this can be demonstrated in the consent process as opposed to conventional subdivision then it should be valued. What is probably required is a set of guidelines on sustainable land use in the subdivision and building consent process. The before mentioned Standards New Zealand Publication Subdivision for People and the Environment goes some way to doing this.

**GENERAL COMMENTS**

This document represents a submission to the District Plan Review by the group Eco Co-Housing Kapiti.

We represent a group of families who are looking to establish a co-housing community on ecological or permaculture principles in the Kapiti district. There are several examples of 'eco-cohousing' overseas, but one of the more well known examples in New Zealand would be Auckland's 'eco-neighbourhood' Earthsong. While Earthsong gathers 32 households in one eco-cohousing project, our group has concluded that a more appropriate size for our intentions would be between 6 and 8 households.

We believe that an eco-cohousing approach to living, building, and working would make an important contribution to KCDC's desire to plan for an environmentally and socially sustainable future. We do not believe that our approach is the only approach in working towards this future; it is just one of several endeavours being undertaken on the coast.

We would like to think that the Kapiti District Plan currently on the table will offer guidelines and support for all initiatives that express and promote sustainable living, building and working in small neighbourhoods on the coast.

We believe the discussion documents that KCDC has presented to the public are an excellent summary of the many different aspects of today's debate about sustainable urban planning.
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<tr>
<td>139800</td>
<td>J G McCardle</td>
<td>COMMENTS ON ALL DISCUSSION DOCUMENTS</td>
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<tr>
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<td>Excellent – yes you are on the right track. I liken it to the Auckland-Hamilton changes, so successful</td>
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<tr>
<td>139801</td>
<td>D L Vautier</td>
<td>URBAN FORM AND TRANSPORT</td>
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<td>Total traffic will increase because there are more people.</td>
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<td>I have read the District Plan Review 2010 Urban Form and Transport and I am extremely disappointed that there is no mention of Elizabeth Street rail and SH1 intersection. The present situation is completely unsatisfactory. Every week there is at least one occasion when we have to wait three or more light sequences to cross the rail. There is too much traffic for the intersection. The pending commencement of the commuter train service to Wellington will make the situation unacceptable, an emergency or alternative crossing is essential. Most of the traffic is local therefore, it is a KCDC problem and the suggested second lane out is only an insult to residents on the hill and beyond. With the upgrade of SH1 earliest completion date of 2017 we must have better access to the rest of Kapiti and SH1 before the trains start.</td>
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<tr>
<td>139805</td>
<td>NZ Transport Agency</td>
<td>URBAN FORM AND TRANSPORT</td>
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<td>In May 2009, the government published a Government Policy Statement on Land Transport Funding (GPS) that identified seven key national transport routes requiring significant development to reduce congestion, improve safety and support economic growth. These Roads of National Significance (RoNS) include the Wellington Northern Corridor (Levin to Wellington Airport), and represent a statement of national road priorities, acting as a focus for investment to achieve economic growth and productivity.</td>
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<td>The Urban Form and Transport discussion document acknowledges the Wellington Northern Corridor (RoNS) and comments on its associated anticipated impacts within the Kapiti Coast District. The NZTA notes that any impacts cannot be anticipated at this stage as no decisions have been made on the preferred options or the associated design through the Kapiti Coast District. A more balanced portrayal in the documents would be to highlight the key points of the GPS and the new opportunities for successful integration of land transport/land use outcomes/solutions.</td>
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<td>Whilst the document focuses on the benefits of roads for the local community, it provides little recognition of through-traff ic functions. From a more holistic view, it makes sense to include objectives, policy, rules, standards and other methods which support the ongoing operation of the Wellington Northern Corridor RoNS and the associated local and regional connectivity.</td>
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<td>The NZTA supports the retention of the growth approach of consolidation that forms part of the Kapiti Coast: Choosing Futures Development Management Strategy. The concept of 'smart growth' targets intensification around current and future transport nodes. Replication of the urban edge approach in other areas throughout the Kapiti Coast District is supported for those areas that currently have the existing infrastructure or have the ability to provide for potential new infrastructure in order to accommodate such growth.</td>
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<td>With respect to growth, the NZTA also notes that some of the content of the current Kapiti Coast: Choosing Futures Development Management Strategy (2007) may require updating to reflect more recent decisions made around transport. In particular the Development Management Strategy focuses on the Western Link Road concept as opposed to the Wellington Northern Corridor RoNS. As the Development Management Strategy informs the District Plan Review it may be an appropriate time to update the Strategy to reflect current land use and transport thinking in the Kapiti Coast District. An example of this is the potential revocation of the existing State Highway 1 corridor, which could lead to increasing growth opportunities and development pressures along this road corridor. The Development Management Strategy should consider these potential issues as part of the longer term growth management strategy for the Kapiti Coast District.</td>
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<td>The Urban Form and Transport discussion document hints that the District could develop a greater role as a transport hub; however this option is not explored further in any great detail in the rest of the document. The NZTA would be interested in participating in any future thinking around this transport hub concept.</td>
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<td>The NZTA supports a review of the road hierarchy to be in alignment with the network hierarchy stated within the Kapiti Coast District Council’s Sustainable Transport Strategy 2008 and the inclusion of major community connectors (walkway/cycleway). There is also a clear need to include the proposed Wellington Northern Corridor RoNS in this hierarchy and to consider the impact of the associated interchanges. Local roads should be updated in the hierarchy although it is noted that the function of these roads may change upon opening of the Wellington Northern Corridor.</td>
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<td>Assuming that the formal notification of any resulting Plan Change documents from this review will occur around mid-2012, it will be important to add new notations on the District Plan maps referring to the Wellington Northern Corridor (RoNS) alignment. At this stage, the application for a notice of requirement for parts of the Kapiti Coast section of the Wellington Northern Corridor is likely to be lodged with the Environmental Protection Agency for consideration in late 2011/early 2012.</td>
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<td>The NZTA would support the inclusion of the updated road standards in the District Plan and the design guides (subdivision best practice, medium density and rural subdivision guides), including incorporation of the new NZS 4404 Subdivision Standard. The NZTA also supports the use of Structure Plans which provide more certainty within the plan than relying on the resource consent process. The matters over which Council reserves control over for all subdivision should also include the provision of foot and cycle pathways and the provision of access for public transport. In addition the NZTA would like to be involved in any discussion around further intensification through any relaxation of subdivision standards. The matters over which Council reserves control over for the construction of new roads should be widened to include the standard of construction of the road, pedestrian footpaths, cycle paths, landscaping, stormwater runoff, earthworks, safety and the provision of access for public transport.</td>
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<td>The NZTA supports the general principles of Low Impact Urban Design and Development (LIUDD). The promotion of public transport, walking and cycling, and local employment leading to a reduction in travel demand is considered to be important. However, further work would need to be developed on incorporating transport management at the regional and national level into Low Impact Urban Design and Development principles as</td>
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SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

currently the principles do not seem to successfully function at this wider scale.

The need to revisit Paraparaumu Town Centre Plans is supported, particularly to take into account the latest alignment of the Wellington Northern Corridor and in particular its interchange locations. However, we note that the Council has undertaken a comprehensive analysis of retail issues with the McDermott Miller Retail Study and subsequent analysis and has a well defined retail hierarchy and centres strategy. The analysis demonstrates that there is a sufficient supply of zoned commercial/retail/town centre land for at least 20 years to provide for the needs of the local community. The NZTA would not support any further retail outside of existing centres including further commercial/retail north of Waikanea, if they would have significant adverse traffic effects on the local and regional transport networks.

The boulevard concept along Kapiti Road and Otaki Beach Road is raised in the discussion document. Any future plans to undertake improvements to these key local roads should be discussed with NZTA and developed alongside the future Wellington Northern Corridor RoNS plans.

For Paraparaumu Airport, the provisions will need to be recalibrated in anticipation of the proposed future Wellington Northern Corridor. Where there are significant traffic effects such as the development of Paraparaumu Town Centre, the NZTA would support these areas being classified as being discretionary activities (both restricted and unrestricted) where they exceed a floor area threshold. This will enable the Council to determine whether or not to approve such applications and if approved to set conditions to mitigate any adverse environmental effects including traffic effects. In such cases there should be a requirement to have an integrated traffic assessment of the proposal in relation to the local road network and State Highway 1 as part of the resource consent application.

The NZTA supports the idea of adjusting development impact fees to be in alignment with the level of impact a development may have on a particular area. This should reflect the true costs of providing infrastructure and services. Careful thought needs to continue around this issue however, as it is noted that any significant variance in fees throughout the District may have the effect of stifling growth in some areas and increasing growth pressures on others.

The NZTA supports the concept of developing a housing and transportation affordability index as it is agreed that the affordability of housing is not just about the purchase price. Affordability also includes property maintenance costs, the costs of transportation to work places, schools, accessibility to facilities and services, and costs related to healthy housing such as heating. Increasing urban expansion can place additional, often hidden, costs on both the owners and the wider community (e.g. transportation costs, traffic congestion and air pollution). As part of the project work for the Wellington Northern Corridor RoNS, the NZTA is also assessing accessibility within parts of the Kapiti Coast District which may assist with the development of a housing and affordability index. It is also noted that whilst the concept is supported the discussion document indicates that it would be reliant on banks and mortgage lenders in the commercial sector to provide buy-in to this concept.

The concept of travel planning at the organisational level is encouraged; however the NZTA would currently oppose any relaxation of control over retail and commercial activities with direct access to the current state highway corridor. It is acknowledged that this view may change in the future to allow for future development opportunities along the current state highway corridor once the future Wellington Northern Corridor RoNS becomes operational. Travel Plans should also apply to any applicant (not just organisations) proposing development that would generate substantial traffic effects. Travel Plans should provide for impacts on the current state highway as well as local roads and in some cases will require a Traffic Impact Assessment and a Traffic Demand Management Plan to be undertaken as part of any resource consent application.

The discussion document does not appear to address reverse sensitivity noise issues on either the current or future State highway corridor. One means of mitigating road noise from the existing state highway and the future Wellington Northern Corridor RoNS is to include a noise insulation standard for new dwellings. The existing District Plan standard appears to work well for dwellings constructed adjacent to State highway 1. The noise insulation standard should also apply to the future proposed State highway corridor. While the new Wellington Northern Corridor RoNS will be designed in a manner which reduces noise effects and the potential for reverse sensitivity issues to arise, requiring new dwellings to include extra noise insulation will reduce noise levels further thus reducing the potential for reverse sensitivity from new landowners. It is considered that the current wording of the noise insulation standard will need to be changed to reflect the likely change from the “Sandhills” arterial designation to the proposed Wellington Northern Corridor RoNS

Biodiversity

This document states under this heading that the practice of accepting mitigation or ‘off-setting’ to address adverse effects is ‘particularly dubious’ when natural features such as wetlands are sacrificed on the condition that new wetlands are created. The NZTA opposes this suggestion particularly if it were to be translated into subsequent objectives, policies and rules. Instead an example of further thought in this area is the proposed Horizons One Plan which includes the concept of biodiversity offsets, and goes so far as acknowledging that it is not possible to off-set in every circumstance due to particular requirements associated with some infrastructure.

Any objectives, policies and rules drafted around earthworks controls and/or vegetation removal should acknowledge the important role of nationally significant infrastructure projects. This includes recognising the ability of these infrastructure projects to support and provide for the anticipated growth in the Kapiti Coast District

Landscape character and heritage

Viewshaft protection is often found along road corridors, as they provide an undeveloped linear line of sight that allows for clear views of key landmarks. An example is given in the discussion paper on the views of Kapiti Island when traveling south on the existing State Highway 1. The benefits of ensuring the retention of landmarks through the use of viewshaft protection is acknowledged, however the NZTA believes that this should also be balanced with the recognition of the functional access requirements of roads and associated roading structures. Recognition to provide for the functional aspects of roading infrastructure should be acknowledged if any viewshafts are identified along the State highway.
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<td>The proposed Wellington Northern Corridor RoNS will potentially support the ideas around individual urban character by relocating existing gateways into the town centres throughout the Kapiti Coast District and will also provide an opportunity for new urban design outcomes in the District.</td>
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<td>In the rural area, the NZTA strongly supports the restriction of one dwelling per rural lot. Any increase of density through rural infill will not only significantly alter the existing open rural character; it will also potentially significantly increase traffic using the State Highway and local road network. For the same reason, the NZTA would like to be involved in any discussion around further intensification through increased subdivision. The current rural subdivision rules and standards already provide for a variety of lot sizes and resulting land uses. As such any further intensification will most probably increase the number of lifestyle blocks and associated increase in traffic. The NZTA would also oppose any relaxation of retail and commercial activities with direct access to the existing State highway or access to the future Wellington Northern Corridor RoNS.</td>
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<td>In terms of any possible review of signage rules, the NZTA supports the current restrictions on signs including the non-complying activity category of signs that could be disruptive to road users. If better urban design outcomes are desirable then the control of the 3rd party advertising signage should be retained, particularly around State highways.</td>
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<td>Heritage provisions in the District Plan for NZHPT Category I heritage buildings should be reclassified from a Prohibited Activity to Discretionary (Restricted) Activity. The Council's discretion in this regard should be limited to heritage effects only and any requirement for to notify applications need not apply. This will allow for a more sustainable approach for heritage acknowledging that these buildings may from time to time require partial demolition for future maintenance, earthquake strengthening and to ensure their ability to accommodate new activities.</td>
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<td>FOOD AND RURAL PRODUCTIVITY</td>
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<td>The NZTA supports the concept of a 'local food economy' whereby local food is grown and sold locally as it will potentially reduce transportation costs and impacts on the State Highway. What is not supported is the breaking up of class 1 and 2 soils into rural-residential lifestyle blocks. This would potentially alter the open rural character of the rural environment; it would result in further households and associated traffic movements and cars using the local and regional road network.</td>
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<td>The discussion documents indicate that the Kapiti Coast District could position itself as a centre for food production and associated food processing. As this includes transportation of food and other goods, the NZTA would like to be party to any further discussions on this concept.</td>
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<td>INFRASTRUCTURE AND ESSENTIAL SYSTEMS</td>
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<td>The objectives and policies in the new District Plan should reflect and support the Wellington Northern Corridor RoNS construction, operation and maintenance, including by protecting it from reverse sensitivity effects. The importance of State Highway 1, both to Kapiti Coast residents and through traffic needs to be recognised. Currently, it is not clear whether the document considers reading to be &quot;infrastructure&quot;.</td>
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<td>The Discussion Paper states that there is an opportunity when constructing new roads to include installation of underground ducts for fibre optics. The NZTA supports any opportunities to participate in co-location of infrastructure provided that appropriate levels of cost sharing are agreed. This concept is in alignment with the current thinking around the RMA Phase 11 changes where co-location of infrastructure is being actively debated.</td>
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<td>139808</td>
<td>David and Ethel Burson</td>
<td>URBAN FORM AND TRANSPORT</td>
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<td>Among the District Plan Review Documents I received I could find nothing on building code regulations, rules etc. We submit the present building code, which limits suburban dwellings to a maximum height of 8 metres defines the intent adequately, but the rule can be avoided by people with ingenuity. A three story dwelling is not strictly possible within eight metres from original ground level, but the following examples show what has been granted by Council, without reference to neighbours. Example 83 Marine Parade. (North comer Marine Parade and Rua Rd.) This house on the waterfront was built about 2000 to maximum site coverage and height. The height was only achieved because the original section was dug out by at least half a metre. It is a very significant blot on the area which obstructs neighbours views of the sea and foreshore. In addition they then installed a large air conditioning unit on the second floor balcony at the rear! Why did Council allow the original ground level to be excavated and then grant a building permit without any reference to neighbours?</td>
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<td>Example 3 Rua Rd. This house of 3 stories with a very high pitched roof would exceed the 8 metre rule by a large margin. The original owners, Pembertons told neighbours the house would not obstruct views, but the reality was very different and then too late for any action. These two examples prove that people with no regard for neighbours or local character, can manipulate the codes, rules etc to their advantage if they have the money to engage &quot;experts&quot; and the rules need to be much tighter. We are not planers but submit that any urban building permit application for three stories should not be automatically granted without reference to all neighbours who could be affected.</td>
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<td>LANDSCAPE CHARACTER AND HERITAGE</td>
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|        |                  | Have we summarised the issues accurately. Yes the issues are summarized accurately for rural zones Not for residential zones. Outstanding landscape areas, such as escarpment and ridgeline above SH 1 (Ridgeview) that were zoned rural 20 years ago have since been rezoned residential and lost the rural zone escarpment protection. Driving east along Raumati Rd to SH1 and looking towards the ridgeline there are two houses standing out on the ridge which would not have been granted building consent while it was zoned rural. One house in particular stands out because it is totally exposed on the ridge and in addition is painted white! , 20 plus years ago Council made a great feature of changed zoning features that NO houses would be allowed on the ridgeline and any granted consent just below the ridgeline could only be painted "earth" colours like greens browns; Not white. Why were the residential zone rules changed? Why should there be a difference on
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| 139820 | Daphne Steele         | ridgeline rules between residential and rural?  
We submit that residential rules for building on escarpment or hills be changed urgently to conform with rural subdivision guide on pages 12 and 15 of the discussion document. |

### GENERAL COMMENTS

Kapiti Environmental Action Inc (KEA), of which I was the convener of the Planning and Development Group for 18 years, was an active participant during the writing of the present Plan, previous Strategies (early 70's) and Transitional Plan.

Now, looking back over the years to that process, and remembering the many drafts and submissions, and it must be said, the hard work of convincing councillors and staff, I am grateful the issues are here recognised and articulated so well. These documents show that there is a true understanding of the environment and of human relationship with it, and of the significance of the results of actions which cannot be reversed.

With this has also come a better understanding of the things which make an area a desirable and attractive place to live and the dynamics of built and natural environments, with an apparent commitment to improve the District Plan into a better tool to nurture and promote stated goals and eliminate perceived problems. What wonderful progress from 20 years ago! It gives great satisfaction to see our Council so well served by a dedicated and educated staff.

I particularly commend the language which is welcoming and inclusive and encourages participation in this project. 
I support all parts of these three papers

### URBAN FORM AND TRANSPORT

This document is extremely well prepared and presented. While there is a great deal of text the format means it is not formidable.

- The designing of the district must not be left to developers in the haphazard way as in the past. A comprehensive overview is essential and only Council can do it. It is regretted that central government already makes their job difficult, but some remedial work can be done by careful forward planning.
- Issues well articulated - would like more emphasis on hazard zones.
- While new infrastructure is featured there should be more assessing of replacing older infrastructure. This will be a growing problem over the years.
- There seems to be no intention of defining areas of no possible future development - no go areas - with reference to the new tsunami evacuation zones and earthquake zones. (These may be referred to in another part of the review.)
- Emphasis should be more on protection of productive land.
- There seems to be no intention of building specific cycle lanes, as against continuing the current policy of shared roads and shared pedestrian tracks, both unsatisfactory.

The Development management Strategy and the Subdivision Design Guide should definitely be included into the District Plan. The more strength the better, so both policies and rules should be employed. 

Should promise better monitoring of requirements of quarries etc. p 11

Visual effects are not being remedied well enough – stronger penalties are needed.

Stronger penalties for subdivision consent breaches - but consistent full monitoring would make these unnecessary. 

Suggest there should have been identifying numbers when referring to the RMA, Regional Policy etc, to help comprehension of requirements.

### BIODIVERSITY

This is full of information and suggestions. It reinforces the truth that biodiversity is fundamental to our continuing ability to sustain or improve the district, and that strengthening the provisions in the D.P. is vital to achieve it.

- As KEA has found in the past, and now looking at subdivisions where we were instrumental in getting Resource Consent Conditions imposed, the actual results are far from what was intended. Sometimes the conditions have been modified by council at a later date, sometimes not picked up by monitoring soon enough.

- Monitoring needs improving - it has been haphazard, probably due quite often to funding, but it is too important to be skimmed, so funding must be provided. Nip the problem in the bud! Otherwise you are on the back foot from the beginning. Pg 12/13

- I agree with this paper that mitigation rarely works. The environment has a way of reminding us that we are in charge and once interfered with results cannot be reversed. Mitigation should be used as a minor - not a major - tool.

- Ideas
  - Green Network - overview should be the aim.
  - I would like to see a comprehensive explanation of transferable rights.
  - I support strongly the strengthening of Rules and Standards provisions in the D.P. as a tool to improve performance, pg 15 and 18.
  - More active pest control.

### LANDSCAPE CHARACTER AND HERITAGE
SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

Very well structured, inclusive overview with reference to statutory requirements. (The numbers correspond to those in the documents)

Ideas:
- Support urban character assessment of Raumati, Paekakariki and Otaki to preserve distinctive character.
- Support strongly the Development Management Strategy.
- Support the design guides as regulatory tool p17.
- Incorporate regulation now that tsunami and earthquake risks are more fully understood.

missed:
- Approaching from north -the Statue is a defining feature.
- Should promise better monitoring of requirements of quarries etc. p1
- Visual effects are not being remedied well enough - stronger penalties are needed.
- Stronger penalties for subdivision consent breaches - but consistent full monitoring would make these unnecessary.
- Suggest there should have been identifying numbers when referring to the RMA.
- Regional Policy etc, to help comprehension of requirements.

139862 Forest and Bird, Kapiti Mana Branch

GENERAL COMMENTS

Kapiti Mana branch of Forest and Bird was pleased to receive the four Discussion Documents relevant to our interests - Natural Hazards and Managed Retreat; Biodiversity; Landscape, Character and Heritage; and Urban Form and Transport. We found them well presented, informative and interesting and were encouraged by their positive approach to protecting the natural environment.

We wondered, however, whether it would be worthwhile to have a sentence or two about the bigger picture and say something about the increasing global awareness of the fragility of the planet including the need to protect biodiversity and the impact from climate change. In other words, environmental issues are now mainstream and the Resource Management Act has placed the responsibility on Councils to promote environmental sustainability.

For New Zealand, environmental issues are a top priority not only for the economy with its reliance on a "clean green" image but also for tourism. The Kapiti District is no different from the rest of New Zealand in this respect. We would hope that a reference to these broader issues would assist your arguments for landscape and biodiversity protection not only with the community but also with Councillors.

Local residents, during the Choosing Futures consultation exercise, expressed a clear preference that environment, the major reason they chose to live here, should be accorded greater protection. A view now acknowledged in the LTCCP. In accord with that aim, the last 14 years have seen Forest and Bird members contribute in excess of $1 M dollars worth of volunteer labour to revegetation projects throughout the District. It has however been very sad to observe the, in our view, degree of inadequate consideration that has been accorded to the protection of ecological biodiversity. It is understood that some 60 volunteer groups are currently recognised by the Council as being active on environmental projects This provides an indication that large numbers of residents appreciate the rapidly impacting consequences of global warming and are prepared to contribute, in ways that they can, to lessen these We and they are entitled to expect that the Kapiti Coast District Council will similarly show leadership and commitment.

Finally, we wonder whether a further Discussion Document is necessary given that the public will be asked to comment and submit on a draft District Plan and then the final text of a District Plan The exercise is becoming time consuming and onerous and the crunch stage will be when a text appears for approval. It is then that minds are concentrated.

URBAN FORM AND TRANSPORT

These subjects are very complex and Kapiti Mana branch lacks the professional expertise and knowledge to make constructive comments. Nor does the Council have control of all matters, for example, the proposed expressway. Considerations of finance and investment, demographic growth and expansion, employment opportunities and changes in social behaviour, for example, city flats or houses, play a large role.

Obviously, we do not favour an unregulated spread into "greenfields" and certainly believe that vacant lots in land zoned residential should be used before other land is taken. We would support "infill" housing but not to the extent that it destroys the character of an area.

BIO DIVERSITY AND LANDSCAPE CHARACTER AND HERITAGE

We agree with what you say in these discussion documents. In particular we support the measures for protecting biodiversity

We would hope that riparian margin setbacks and landscaped/natural area zoning for rural landscapes would help to achieve this. We would also like to see the inclusion of a commitment to encourage and support private owners who are undertaking revegetating portions of their landholding.

The combined efforts of the volunteer groups is helping to redress some of the loss of ecological biodiversity, and thereby improving the quality of life within their communities and the district at large. To ensure that these gains, so generously given, are not lost, regular state of the environment monitoring and reporting is needed as suggested on page12.
The Kapiti Mana branch is keen to see the inclusion of a commitment for linking ecological remnants with restoration projects and reserves, as a way of creating ecological corridors, whenever opportunities may permit. Towards this end, we strongly support the objective of the Waitakere City Council on page 10, and also the inclusion of two layer zoning (built and natural area zoning) as recorded on page 13. It is understood that WCC and LHCC are committed to include the ecological corridor provision in their documents.

We support the identification and inclusion of areas undergoing restoration and also areas suitable for restoration as suggested on page 14. The possibility of providing inducements to landowners willing to sign an agreement to keep stock water from water ways needs to be seriously considered.

One of the obstacles to landscape protection has been that the District Plan contains no definition of "outstanding" landscape. Identification of natural landscapes is, therefore, especially important as are the cumulative effects of development and subdivision. The Kapiti District shows the unhappy results of no control on these matters. We are in agreement with the measures you propose.

We are under no illusions but that the measures proposed in the Discussion Document will be challenged, perhaps with the next Discussion Document but undoubtedly with the draft District Plan.

Based on the experience of Kapiti Mana branch with applications for private plan changes and resource consents at both the Council hearings, Environment Court mediation and Environment Court hearings the difficulty of obtaining a good environmental outcome is more than having good policies and rules in the District Plan. While, therefore, we completely agree that good planning is required to counter the pressures of development which has induced and continued the rapid decline in indigenous diversity (Executive Summary, Biodiversity) more is needed. You quote Mark Bellingham who has identified that district plan rules combined with "competent enforcement" are the most effective means of achieving biodiversity outcomes. We agree. Lack of monitoring and enforcement have been gross weaknesses over recent years. They do, however, cost money which Council has been reluctant to provide.

This brings us to the lesson we have learnt from our experience, namely, that it is only if the Council and the Councillors as Hearing Commissioners are determined to follow and implement the policies and rules will these be of any use. There needs to be a move away from a development bias to an environmental approach. Continuing approval of subdivisions without the necessary infrastructure being in place, has been identified as the reason why so many local authorities are facing major increased levels of indebtedness.

The Resource Management Act does not set out the law in black and white and allows for interpretation, particularly with the words "appropriate subdivision". It also allows for discretion in determining certain cases. In the past the words "appropriate subdivision" have justified a number of subdivisions with consent conditions your discussion papers have criticised. For example, Council has approved and defended when challenged, subdivisions where wetlands nourishing native plants, fish and birds have been turned into ponds for exotic ducks, subdivisions on coastal dunes with 4(?) metre high concrete supporting walls, subdivisions on ridges visible throughout the District and by travelers down State Highway 1 even when the ecological factors supported an environmental decision.

NATURAL HAZARDS AND MANAGED RETREAT

The primary thrust of this paper is the protection of lives and property as a consequence of climate change and other natural hazards such as floods. This is quite appropriate. As a consequence of protective measures there will undoubtedly be advantages for the coastal environment and for the health of rivers and streams and the bird life associated with them. To a degree any such measures will mitigate the damage from existing unsound subdivisions.

Kapiti Mana branch fully supports measures for ecological restoration, for coastal setbacks and provisions for riparian planting and esplanades.

URBAN FORM AND TRANSPORT

re: "Urban Form and Transport" and also "Facilities for the Older Population"

"The quality and efficiency of the built environment ..." We now have a 12-year wait for a fully functioning state highway outcome (of whatever plan). To facilitate a good quality of efficient life for many of us older residents who are engaged in activities on both sides of the river, it would be good if we could more easily get across the Waikanae River on foot. The Swing Bridge is a good walking option but, while the southern side of the bridge has vehicle access, there is no way to drive to that bridge on the north side to pick up anyone who can't walk the half-kilometre on the northern side from the bridge to the road, i.e. the retired folks, of which Kapiti has a high percentage.

Would it be possible to run a short entry road off Weggery Rd, finishing in a turning circle somewhere CLOSE to the north end of the Swing Bridge, so that somebody walking (even with a walking stick, or pushed in a wheelchair) could be picked up in a car?

Support of a number of the new ideas being considered for incorporation into the District Plan. In particular, Coastlands supports the, following initiative Improve Paraparaumu Town Centre

Coastlands considers the Discussion Document has summarised well the general challenges of land use and transport integration, and has identified methods of growth management that could be considered. However, Coastlands does not consider the Discussion Document summarises the issues that currently exist in the Kapiti region, and considers that during the early stages in the District Plan review process, an understanding of the issues that are specific to Kapiti will be required so that the appropriate growth management method (whether for the district as a whole or for a specific development centre) could be applied.

Supports Council's plan to improve the Paraparaumu Town Centre with a focus on enhancing this civic and commercial heart of the district. Coastlands looks forward to working with the Council in developing an appropriate intensification plan for the Paraparaumu Town Centre in light of the opportunities created by the proposed Expressway, and in the interests of continuing the operation and further potential growth of Coastlands Shoppingtown.
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<td></td>
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<td>Supports the initiative to increase the use of spatial planning and structure planning. Developments being planned in using these approaches should link into the initiative which target intensification around current and future transport nodes. Structure plans that are prepared should clearly set out the anticipated timeframes for when the new developments could be provided, so that the growth occurs in a controlled manner and in conjunction with provision of the relevant infrastructure.</td>
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<td>Where appropriate Coastlands agrees that some of the existing Design Guides could be integrated into the District Plan to provide for greater certainty to developers. In Coastlands previous comments on the District Plan Review, it also considers that a design guide for large format retail in commercial centres/Town Centres should be developed. Coastlands considers that such a design guide (to be developed in coordination between the Council, developers and landowners within the Town Centre) would greatly assist in ensuring that large format retail proposals are assessed consistently and effectivly. Decisions on which Design Guide should be mandatory and which ones should remain voluntary must be made with careful consideration and adequate public consultation during the review process. Coastlands looks forward to participating in this process in due course.</td>
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<td>Coastlands supports targeting intensification around transport nodes, such as the Paraparaumu Town Centre. Coastlands has consistently supported policies at both the Greater Wellington region and the Kapiti District levels that encourage development around identified urban centres and around the development of a compact urban form. Coastlands considers a targeted approach is one of the most important method in growth management that will ensure development occurs in a way that integrates transport and infrastructure within a suitable timeframe.</td>
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<td>The proposed Expressway will provide opportunities and challenges for development along the route and surrounding settlements, including the Paraparaumu Town Centre. Coastlands agrees that the District Plan Review will need to consider ways to manage this development pressure that is consistent with Council's growth strategy. As already indicated above, Coastlands looks forward to working with the Council in developing an appropriate development plan for the Paraparaumu Town Centre.</td>
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<td>Coastlands submitted comments on the District Plan review and Plan Change 78 stating that a review of the parking standards in the District Plan needs to be completed before any new standards are proposed. In particular, Coastlands considers shared parking between the different outlets should be considered in regards to car parking requirements. Coastlands is therefore supportive that the Council has identified the potential for shared parking in town centres. The parking requirements in the District Plan need to be carefully reviewed to ensure adequate car parking spaces are provided, but that it does not result in an over-supply, potentially creating dead spaces within the town centre.</td>
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<td>Coastlands supports Council reviewing its Development Impact Fees to adjust them to reflect the true costs of providing infrastructure and services, particularly if a new development is proposed outside of established urban areas. As part of the review of financial incentives, this needs to be closely aligned with the review of Infrastructure and Essential Systems requirements and ensuring that my new fee structures or alternative financing approaches take account of development costs, which define whether a development if financially sustainable.</td>
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<td>Related to the financial incentives suction, Coastlands supports Council spending capital dollars on infrastructure where it wants growth to occur, but does not support a stance of not allowing or making developers pay for the full cost of infrastructure that's requested ahead of the Council's plans. Alternative funding mechanisms should be evaluated to clarify Council's position in the first instance as the current position provided in this discussion document does not take account of the public/private benefit of some developments.</td>
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<td>Coastlands also wishes to seek further clarification on the proposed initiative to increase requirements for, and promotion of travel planning and travel demand management.</td>
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<td>Coastlands agrees the development and implementation of a well-planned travel plan could promote the use of alternative transport modes and reduce reliance on private motor vehicles and its corresponding effects on land use. Coastlands however does not consider that introducing the mandatory use of a travel plan is appropriate or practical for all types of organisations or businesses. For example, Coastlands provides retail space in the Paraparaumu Town Centre however it is not responsible, nor does it have any control, for the way the retailers operate their businesses. As the retailers would not be individually required to obtain resource consents to operate within a shopping mall, if the travel plan initiative is made mandatory in the District Plan, this would require Coastlands to undertake travel plans for an activity that it has limited control over. Coastlands would support the development of travel plans if it is a voluntary requirement that is only applied to organisations or business that is able to produce meaningful and enforceable travel plans.</td>
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**GENERAL COMMENTS**

Transpower New Zealand Limited (Transpower) is the State Owned Enterprise that plans, builds, maintains and operates New Zealand's high voltage transmission network - the National Grid which links generators to distribution companies and major industrial users. The Grid, which extends from Kaitaia in the North Island down to Taiwa in the South Island, transports electricity throughout New Zealand. Overall, Transpower considers that the discussion documents do not adequately recognise the National Grid and the issues associated with its ongoing operation, maintenance and upgrading nor do they recognise and provide for transmission corridors. It is critical that the planning documents that guide development within the Kapiti District adequately provide for the core "regionally significant" infrastructure that is required to support growth. Unless these issues are appropriately addressed, the NPSET and the Wellington RPS will not be given effect to and the sustainable management purpose of the RMA will not be promoted. The provisions of the District Plan need to:

- Give effect to the NPSET;
- Give effect to the policies of the Wellington Regional Policy Statement;
- Recognise the benefits of the National Grid;
- Ensure and protect the ability for ongoing operation and maintenance of the network;
- Protect the existing network from issues of reverse sensitivity;
- Enable the existing network to be upgraded in order to meet growth in power demand;
- Provide an appropriate policy framework for the development of new lines; and
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<td>• Ensure that there are no conflicts with provisions of the District Plan and NESETA (s44Aof the RMA).</td>
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<td><strong>URBAN FORM AND TRANSPORT</strong></td>
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<td>This discussion document focuses on the urban form of cities and settlements, which are shaped by transport and other infrastructure, and outlines the issues associated with urban growth. Such issues include effects of development on the natural environment and an increase in pressure on existing infrastructure, including roads, sewers and water supply. It also identifies that development can be difficult to fit around the existing environmental constraints on the Kapiti Coast.</td>
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<td>However the discussion document fails to recognise the key issues associated with urban growth near existing transmission assets, including:</td>
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<td>• That activities in close proximity to transmission lines can generate adverse effects on these lines; That the lines can adversely affect those new land uses;</td>
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<td>• That the location and scale of regionally significant infrastructure should be taken into account at an early stage in the subdivision, land use and development process (when changes are more likely to be made in response to identified issues); and</td>
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<td>• That the National Grid traverses many private sites and so can be sensitive to effects that do not otherwise extend beyond the site boundary.</td>
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<td>Managing the adverse effects of third party activities on the electricity transmission network is an objective of the National Policy Statement on Electricity Transmission Activities 2008.</td>
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<td><strong>LANDSCAPE CHARACTER AND HERITAGE</strong></td>
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<td>This discussion document summaries the issues relating to the management of landscape, character and heritage in the Kapiti Coast District. As part of the District Plan review the Council proposes to build on and strengthen the Council's existing policies relating to the identification and protection to ensure their preservation and enhancement.</td>
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<td>There is no recognition in the discussion document that high voltage transmission lines may traverse areas of outstanding natural landscapes and features and that the ongoing operation maintenance and upgrading of these lines needs to be provided for in accordance with the NESETA.</td>
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<td><strong>INFRASTRUCTURE AND ESSENTIAL SYSTEMS</strong></td>
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<td>This discussion document explores the issues surrounding the provision of infrastructure and how the District Plan can be used to influence its placement and form. This discussion document outlines a range of ideas for consideration and discussion as part of the District Plan review.</td>
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<td>Transpower supports the intent of the discussion document and in particular the acknowledgement of the New Zealand Code of Practice for Electrical safe Distances 34.2001 (The Code). However, there has been no recognition of the need to for the District Plan to give effect to the National Policy Statement on Electricity Transmission Activities 2008 (NPSET 2008) or reference to the applicability of the National Environmental Standards on Electricity Transmission Activities 201 0 (NESETA).</td>
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<td>139893</td>
<td>McDonalds Restaurants (NZ) Ltd</td>
<td><strong>URBAN FORM AND TRANSPORT</strong></td>
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<td>McDonald's has previously made some generalised comments about the forthcoming district plan review in a submission dated 13 May 2009 and those comments continue to reflect the Company's main concerns. There are no major issues arising out of the recently released discussion documents that necessitate further comment at this stage, except for the impact of the Kapiti Expressway.</td>
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<td>As Council will be aware, McDonald's has a large restaurant in Paraparaumu that was established on a site originally driven by the need for a State Highway location. The restaurant was recently extensively remodelled at a cost of around $800,000.</td>
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<td>The impact of NZTA's preferred option for the Expressway on the viability of McDonald's Paraparaumu restaurant will be severe. Ultimately, the Company expects that it will need to establish a new restaurant in Paraparaumu, and would seek a location that is more accessible to a growing local population. Accordingly, the Company would like the Council to ensure that sufficient commercially zoned land is available, and that district plan policies are supportive of vehicle oriented businesses on appropriately located sites within or at the edge of the main town centres (particularly Paraparaumu). In the meantime, the Company would like to see the status quo remain on State Highway 1 so that the economic impact on existing businesses is minimised.</td>
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<td>139933</td>
<td>KiwiRail</td>
<td><strong>URBAN FORM AND TRANSPORT</strong></td>
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<td>The New Zealand Railways Corporation (trading as KiwiRail) is the controlling authority for all core (i.e. non-surplus) railway land and infrastructure within New Zealand, on behalf of the Crown. We are also the national rail operator responsible for rail freight and passenger logistics within New Zealand. Nationally KiwiRail is responsible for 4000 kilometres of railway throughout New Zealand. This includes the North Island Main Trunk Railway (NIMT) which operates both through and within the Kapiti Coast District.</td>
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<td>The NIMT is both a nationally and regionally significant transport corridor. The NIMT supports KiwiRail's frequent Tranz Metro rail commuter services between Paraparaumu and Wellington. Within Kapiti and the greater Wellington Region, the NIMT provides a vital link for rail passenger and freight transport. This line also supports rail freight between Wellington and the greater North Island, as well as long distance passenger services.</td>
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into the Wellington region, including the Kapiti Coast. The NIMT is designated (designation D0301) for Railway Purposes within the Kapiti Coast District Plan. NZRC is the requiring authority responsible for the DO301 designation and the balance of the Railway Purposes designations throughout New Zealand.

Rail is a key element of New Zealand’s transport network and will provide a significant role in meeting the vision of the New Zealand Transport Strategy (NZTS), the Regional Policy Statement and the Regional Land Transport Strategy. The key focus for each of these strategies is to provide a well designed “affordable, integrated, safe, responsive and sustainable transport network.” KiwiRail supports Council’s aim to manage growth through the creation of consolidated and contained communities. To achieve this, we recognise that it is important for Council to create well designed and sustainable community nodes within the District.

By centralising and integrating development around both community amenities and transport networks, Kapiti’s nodes will retain their appeal and their connectivity both within and through the district. This is consistent with the Wellington Regional Policy Statement which seeks to retain the respective vibrancy and appeal of each of the District’s communities while at the same time encourage the efficient use of regional and local resources.

To support increased growth within the Kapiti District, KiwiRail is currently upgrading the regions commuter rail network. This includes double tracking and electrification to Waikanae; to enhance commuter services and increase network capacity. We are also preparing for the introduction of new electric passenger units to boost the current supply of commuter passenger trains for the region.

Nationally, KiwiRail is working on improving the operational efficiency and sustainability of our rail network. The "KiwiRail Turnaround Plan" aims to grow rail patronage between Auckland and Christchurch. Not only will this require focusing on the operational components of the rail industry, but also upgrading of the rail infrastructure to increase efficiency. As part of improving network efficiency, KiwiRail will restrict new level crossings and we may also look to remove existing level crossings.

While KiwiRail supports the centralisation and integration of development around significant transport networks, Council should also consider the potential reverse sensitivity effects that can arise from the intensification of development near transport corridors. Reverse sensitivity is “the vulnerability of an established activity to objection from a sensitive land use.” The term generally relates to the effects of the development of a sensitive activity in an area that is already affected by established infrastructure activities such as transportation facilities. KiwiRail believes it is consistent with the RMA to ensure that noise (and vibration) sensitive activities are made aware of the potential for these effects and internal environments are designed to ensure reasonable long term amenity for users. Within District’s it is common for sensitive activities to exist across a variety of zones.

Kiwirail considers that typically the following activities are sensitive to the effects of noise and vibration:

- Residential activity;
- Visitor accommodation;
- Residential care activity;
- Education activity;
- Hospital activity;
- Healthcare activity;
- Day care activity; and
- Marae activity.

Without the appropriate application of acoustic treatments, intensification of development can compromise the safe and efficient operation of key transport infrastructure. Reverse sensitivity impacts will therefore need to be considered in conjunction with the development of nodes and/or new areas close to transport infrastructure to avoid compromising both activities.

139935  Graeme Boucher  URBAN FORM AND TRANSPORT

A good summary of considerations but leaves open the future of Kapiti. The transport timing is good for the Expressway debate.

You avoid a judgement on the effectiveness of existing District Plan guides, the Town Centre upgrades, catering for tourists, medium densities, urban infill, improving existing areas.

Will need to wait for the Expressway route decision. Will affect connectivity but could be to our advantage.

Improving park facilities, Kapiti Road connection, playing fields, beach facilities, walkways, current residential guidelines, railway station, bus routes etc.

No distribution to all affected organisations in Kapiti. Do you have a list of them?

LANDSCAPE CHARACTER AND HERITAGE

A good effort, needed better promotion, encouragement for better input is now needed.

Sometimes the identity of Kapiti - gets confused. Are we beach, parks, rivers, hills, quiet, relaxed. Tourists – yes/no?

Attractions of Kapiti?
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<tr>
<td>139950</td>
<td>John Baldwin</td>
<td>Streetscape. Better subdivision guides. Do you have a list of heritage buildings, good notable houses, best streets, beach facilities? Climate considerations, urban playgrounds, markets, facilities, BBQ, walkways etc. KCDC's LTCCP enshrines the principles of KCDC's excellent Sustainable Transport Strategy. The fundamental issue I have is as an every cyclist is a lack of alignment with KCDC's transport philosophy and the day to day implementation of it in real life. Roadside parking on arterial routes is lethally hazardous to cyclists. Prevailing speed limit of 50kph (read 60) is dangerously high in &quot;residential&quot; areas. 80kph along Ratanui &amp; Otaihanga is ridiculously high. Our pavement infrastructure along arterial routes is long overdue for transformation into shared pathways but year after year 90% of resources is applied to roads. Yes I think you are on the right track. However in my experience there is no shortage of high quality strategic environmentally aligned thinking in KCDC - but there is a significant gap between this strategy and the will/prioritisation to actually transform into reality. Tools for measuring progress in strategy implementation. … and possibly the irregular supply and unaffordability of fossil fuels in the future, reduced use of motor vehicles and the increased demand for active transport mode infrastructure. We need to be planning now for a progressive transition towards a network of shared pathways linking our communities, schools and retail precincts.</td>
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<td>139951</td>
<td>Rachel Palmer</td>
<td>Maybe this was not a missed piece (segment) of information. Ref page 5 “the challenges of mobility and conventional transport planning – ‘pre automobile era’ allowed 10% of urban land for roading’ what is the estimated requirement at this time? I am not sure if Kapiti has had an “Actual Town Plan” except that since about the 1990’s and up till now”. Is this correct? LANDSCAPE CHARACTER AND HERITAGE I am not sure if this has been missed out but maybe more a question of clarity. Is there consultation/mediation when the landscape, character and heritage features is on privately owned land? NATURAL HAZARDS AND MANAGED RETREAT Yes this is on the right track. The concern expressed from flooding in that its not the actual event but ALSO the long term and side effects of it, that prolong and increase the cost in many ways to a lot of people. This is of importance to urban planning too. INFRASTRUCTURE AND ESSENTIAL SYSTEMS Should Kapiti give consideration of effect to the transmission of energy facilities like electricity and gas through the area? The National Grid and Gas pipeline transverse the area. Stormwater – Collection and Disposal I would have thought this could have been a discussion document on its own. Has been put into infrastructure &amp; essential systems. My comments. I look forward to all information, advice and assistances you can give to landowners regarding stormwater. I am particularly interested in a number of issues. (a) stormwater from other properties (b) what bylaws give ruling and guidance to a property owner – if any? Can a landowner assist by allowing a stormwater drain/s to be put in their property to remove stormwater from adjacent properties? Filling or topping up the ground level of a property – are there guidelines? Soakage facilities – what are the requirements?</td>
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<tr>
<td>139954</td>
<td>Anonymous</td>
<td>INFRASTRUCTURE AND ESSENTIAL SYSTEMS The ideas to set standards for quality and quantity of water/drainage and waste management/ control of erosion caused by development is an excellent move. Permits should not be given if these standards are not attainable or doubtful.</td>
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<tr>
<td>139953</td>
<td>Pataka Moore</td>
<td>INFRASTRUCTURE AND ESSENTIAL SYSTEMS The ideas to set standards for quality and quantity of water/drainage and waste management/ control of erosion caused by development is an excellent move. Permits should not be given if these standards are not attainable or doubtful.</td>
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<td>Papakainga – please look into specific and particular rules and regulations that will allow and indeed support papakainga.</td>
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<td>BIODIVERSITY</td>
<td>Excellent summary under “How Bad is it” on page 5. A very good read, well written.</td>
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<td>District Plan rules and competent enforcement is required. Page use a mix of regulatory and non-regulatory measures. These work well together.</td>
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<td>More needed on the effects of Maori – correct on environment being central to Maori – page 4.</td>
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<td>The good will of the community as one reason why so many QEII covenants feature here has been missed.</td>
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<td>LANDSCAPE CHARACTER AND HERITAGE</td>
<td>The Rural Subdivision Guide and diagrams on pages 12 and 15 are excellent.</td>
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<td>More required on Maori heritage and its importance to the district. There is very little mention of Marae, Hahi Maori and other sites of importance to Maori in the documents presented.</td>
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<td>NATURAL HAZARDS AND MANAGED RETREAT</td>
<td>Good proactive vision overall.</td>
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<td>The possibility of KCDC working with GWRC to limit the impacts that land management and flood protection works have on tangata whenua, especially marae.</td>
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<td>The role of tangata whenua has been missed.</td>
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<td>FOOD AND RURAL PRODUCTIVITY</td>
<td>This is excellent. I like the forward thinking. It is especially good to be prepared for post-peak oil.</td>
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<td>This is on the right track.</td>
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<td>Priorities for tangata whenua (TW) have been missed</td>
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<td>Opportunities for TW to assist in food and rural production.</td>
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<td>Potential impact on areas that are used by TW to gather and/ produce food.</td>
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<td>139956</td>
<td>Progressive Enterprises Ltd</td>
<td>URBAN FORM AND TRANSPORT</td>
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<td>a) The discussion document appropriately acknowledges that addressing growth management, urban form and transportation are important issues to be addressed when reviewing the District Plan;</td>
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<td>b) The discussion document appropriately acknowledges that there are a number of methods and tools for addressing those issues, and that a range of tools and methods may be appropriate in any given circumstance; and</td>
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<td>c) The discussion document appropriately acknowledges that the various methods and tools each have their own advantages and disadvantages.</td>
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<td>In relation to the new ideas for the District Plan, Progressive considers that:</td>
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<td>a) The criteria for evaluating growth options are generally appropriate and that each criteria described contains a significant number of sub-elements, not all of which may have been included in the discussion document;</td>
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<td>b) Growth management options should not solely focus on residential growth issues. While there is a need to ensure that residential areas have access, jobs, parks and transport, these areas also need access to commercial and retail services such as supermarkets; and</td>
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<td>c) Additionally, commercial and retail activities need a sufficient amount of suitably accessible and zoned land within which to operate.</td>
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<td>a) Progressive has some concerns that the review simply adopts the Development Management Strategy 2007 as best practice. Irrespective of the quality of that document, it is 3 years old now and the research which lead to it being adopted will be even older;</td>
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<td>b) Meanwhile the District Plan is unlikely to be notified until 2011, and it is not clear what trends and/or assumptions which influenced the Development Management Strategy 2007 may have changed. In the interim, major global changes such as the Global Economic Crisis have occurred and thinking on urban management has developed (see national policy initiatives, such as Phase II RMA reforms);</td>
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<td>c) Additionally, some of the regional planning documents may be in the process of being updated (see for example the Regional Land Transport Strategy);</td>
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<td>d) In these circumstances it may be appropriate to reassess aspects of the Development Management Strategy prior to basing the District Plan review on it; and</td>
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<td>e) The most important issues for the District Plan tends to be how the growth management tools and methods are applied in a practical sense. Further consultation will be needed when developing these tools and</td>
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Ref No | Name/Organisation | SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS
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139957 | 2 Degrees Mobile Ltd | INFRASTRUCTURE AND ESSENTIAL SYSTEMS

2degrees is concerned that the scope for discussion is limited to the introduction of restrictions on NES compliant proposals, without recognition of the implications of this, or of the need to balance these restrictions elsewhere in the District Plan.

2degrees Mobile would like to see the scope of Council's District Plan review reflect the intended purpose of the NES for Telecommunications Facilities, as well as include extended consideration of telecommunications facilities standards outside of those controlled by the NES.

3. 2degrees Mobile is concerned that the idea "Give effect to and enforce requirements of the NES for Telecommunications Facilities, while considering other factors where allowable." is framed around restricting development of previously NES compliant telecommunications facilities within the Residential Zone. The NES has affirmed that compliance with NZS 2772: Part 1 : 1999 Radiofrequency Fields Part 1 – Maximum Exposure Levels - 3kHz to 300 GHz is the standard to be complied with nationally, and does not consider that creating 'no-go' areas for NES compliant facilities on radiofrequency grounds would help public perception of the validity of the standard.

4. 2degrees Mobile would like to see the scope of discussion for Council's District Plan review extended to areas not encompassed under the size and height standards of the NES. 2degrees Mobile considers light pole replacement cell sites (as are covered by the height and size standards of the NES) as 'last resort options' and prefers to utilise other options where possible. It would like to see discussion of co-location and its associated benefits within objectives and policies, as well as recognition of these within rules and standards. At present 2degrees considers that mention of cumulative effects (16-1 Policy 3) combined with a subjective assessment of whether or not an upgrade constitutes a permitted activity (e.g. 5.1.1 (ii)), is not balanced by consideration of the potential benefits co-location of facilities can provide.

139958 | Telecom NZ Ltd | INFRASTRUCTURE AND ESSENTIAL SYSTEMS

With respect to the comments provided in the Infrastructure and Essential System Discussion Document we note that we have some concern regarding possible improvement idea number 3, relating to the National Environmental Standard for Telecommunication Facilities (the NES).

We are specifically concerned about Council's understanding of the purpose and intent of this standard and the possible use of it to deliberately restrict currently compliance activities (i.e. cell phone sites in residential areas). It is important too that visual amenity areas are not created to address other concerns such as radiofrequency emissions. To this end we would like to see the scope of the District Plan review to reflect the intended purpose of the NES for Telecommunications Facilities.

Telecom supports moves to eliminate any unnecessary barriers to the deployment of broadband. However, we are concerned that some of the concepts being outlined in the discussion document could actually end up doing the opposite and put more barriers in front of the deployment of broadband infrastructure.

In summary, we have suggested some potential standards that would assist with the deployment of fixed line and mobile broadband infrastructure. The key is ensuring the rules remain relevant and permissive of necessary telecommunication facilities and do not unduly restrict these facilities which form a fundamental part of the efficient and effective social and economic development of communities.

GENERAL COMMENTS
Telecom's main interests lie with designations, policy and standards for telecommunications infrastructure across the district, and infrastructure as part of the subdivision process. The telecommunications market and industry has undergone significant changes since 2002 when the District Plan became operative. These changes have implications for how infrastructure is being provided, the effects of that infrastructure and how it can be provided for in District Plans. The items addressed have been summarised in five key areas below: objectives and policies, rules, definitions, subdivision and financial contributions.

Telecom would like to be involved with the review of the District Plan in a collaborative approach at the early stages of the review process. As such we would be pleased to give your team an overview of the telecommunications industry and deployment of our infrastructure. This would enable you to get a good understanding of the trade-offs required with the various policy positions options and standards.

We have recently worked collaboratively with councils and industry stakeholders on a number of district plans. We would be happy to do so again here to ensure you get an industry view. Telecom has a number of existing telecommunications facilities within the Kapiti Coast District, on which upgrades have been carried out, and is also looking to construct new facilities within the District. The current operative District Plan provisions for telecommunication facilities are relatively restrictive, particularly in terms of height allowance, making it already challenging to provide future telecommunication services as required.

Utility provisions under the District Plan are currently listed under each Zone chapter, which makes for much repetition. This could be remedied by having a standalone chapter for utilities. This avoids any confusion over which standards apply to utilities and keeps all relevant provisions in one section of the Plan.
### SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS

<table>
<thead>
<tr>
<th>Ref No</th>
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<tbody>
<tr>
<td>139959</td>
<td>Waikanae on One c/o Aldous MacIvor</td>
<td>This submission sees Economic Sustainability as an essential system and an integral part of sustaining infrastructure efficiency. Economic sustainability requires the Kapiti Coast District Council to recognize that it is an important component of the Kapiti District economy and as such has a need for policies which not only sustain KCDC but also the district in sound financial health.</td>
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<td>Critical to achieving this objective is the need for KCDC to have agreed policies relating to:</td>
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<td>- Financial transparency.</td>
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<td>- Affordable rates.</td>
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<td>- Rational and transparent borrowing and debt management.</td>
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<td>- Foster the local economy by supporting and promoting local enterprise.</td>
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<tr>
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<td>Financial transparency.</td>
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<td></td>
<td>Council provides essential infrastructure and services funded by ratepayers. This ratepayer support entitles today’s ratepayers to be fully informed through transparent, rational and easily understood reporting.</td>
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<td>To achieve economic sustainability KCDC must adopt a policy that first requires the determination of what is an affordable and acceptable level of rate given ratepayer incomes. This then determines the upper limit of council expenditure rather than the present system where KCDC assesses expenditure requirements which is then used to determines the level of rates.</td>
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<td>The current KCDC Public Debt is $71.5 million borrowed on debentures secured against rate income. While it may be correct that the average length of ownership is only six years it has also been established that the bulk of property transactions are by people re-locating within the district. This means that to achieve an inter-generational repayment objective a more careful analysis is required. A further question is that if current ratepayers are finding it difficult to absorb further rate increases, what grounds does KCDC have for assuming that the situation will be any different in ten, twenty or even thirty years time?</td>
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<td>The principles of economic sustainability suggest that a policy of intergenerational debt repayment more equitably shares debt and also ensures that current generations behave responsibly in regard to generating debt. This means that from inception of each debt some form of capital repayment is established within the boundaries of affordable rate income. This may require Council to set aside 10 - 12% of debt annually to cover both interest and capital.</td>
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<td>KCDC is arguably the largest business in Kapiti. It employs 260 full time staff, is funded annually by 22,700 rate payers and is clearly a significant part of the local economy. Audits of major development projects in districts similar to Kapiti have shown the multiplier factor for capital spent on local contractors in the order of 4.3. This means that KCDC by selecting local enterprises, contractors and consultants for local projects makes a significant positive impact on the local economy. However a response from KCDC to a recent enquiry implied that while Council has a Selection of Suppliers Quotation and Tenders policy it places no importance on this principle. It also indicated that Council employs three senior managers who do not live within the district.</td>
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<td>Council can significantly enhance economic sustainability within the Kapiti District by adopting a policy of fostering local enterprise through maximizing where appropriate the use of local enterprise. Consideration also should be given to a policy similar to Wellington and other Councils of insisting that senior managers live within the district.</td>
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### Urban Form and Transport, Landscape Character and Heritage, AND Infrastructure and Essential Systems

<table>
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<tr>
<th>Ref No</th>
<th>Name/Organisation</th>
<th>Waikanae on One c/o Sue Smith</th>
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<tr>
<td>140045</td>
<td></td>
<td>The “possible new concepts” and “Barriers to Remove” should be made definite</td>
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<td>Waikanae On One is a group of residents of Waikanae concerned with the decline of our village centre. In the absence of a residents’ group of any kind, the demise of Waikanae 2020 and an unresponsive Community Board, we have consulted widely with the business community and organised public meetings.</td>
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<td>The long-running decline of the village has recently been exacerbated by the work of Ontrack to improve the rail system. We now believe we have a crisis situation with the disruption of access for the 2000+ residents of east Waikanae, and all those others that use the community facilities that are situated east of the railway line.</td>
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<td>We request that the vehicle of the District Plan be used to highlight these concerns by way of: 1. Developing a set of criteria which constitute a “Waikanae Village Character Area” which can be used to guide and encourage new development. 2. Removing any zoning, carparking, site coverage and height constraints from the Village area which could hinder new, reinvigorating ideas, which will be, instead, judged against the guidelines for the Waikanae Village Character Area. The immediate concerns, involving the access to and from east Waikanae which will shortly be compromised by train movements blocking the only road access every time a train moves over the level crossing planned to be every 7 minutes. This development directly contravenes all Council policies advocating better access and connections for the community, and will create life-threatening consequences when emergency call-outs are affected.</td>
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A further issue of immediate concern is the proposal to upgrade the Mahara Gallery and Waikanae Library. This is a worthy project, but if it is designed in isolation from the wider village upgrade, could prejudice the outcome of the broader project.

The commercial decline of our village has been continuing for some time. With this comes a depressed environment which holds no appeal for residents or visitors, and the decline worsens. We wish to see Council actively addressing this, especially as the planned expressway route will relieve the village of the inappropriate environmental pressure of the State Highway. This will open up a considerable number of opportunities for previously unanticipated improvement.

The 2007 Waikanae Town Centre Report was a good beginning to the necessary planning. However, not only has no work happened on the ground, but nor has there been any more planning to build on this report. The LTCCP does not have this programmed until 2019, despite our submission asking for this to be brought forward. We believe a 12 year delay is unacceptable.

Waikanae On One has made many submissions over the last two years asking for expeditious amendments to the plans for the rail work at our village to avoid obvious negative impacts. No amendments were made and the project is almost complete.

The social impact of this situation is obvious to anyone who understands the numbers of people affected on a daily basis. However, the Council policies designed to improve our environment and to facilitate our lives have been directly contravened. The degree of inertia in the decision-making of the agencies involved has astonished us. Now we foresee not only the considerable social impacts, but also an alarming prospect in terms of emergency vehicles being unable to access eastern Waikanae during times of traffic congestion and/or break-down on the only access road. Eastern Waikanae houses 2000 people, several schools, a large rest-home and the Civil Defence Welfare Centre serving the bulk of our 11,000 residents.

One of the aspects of "character" to be addressed in the proposed Waikanae Character Area guidelines would be enhanced connectivity between east and west Waikanae. The proposed Gallery/Library upgrade is welcome. However, the disproportionate significance of these two civic establishments in a small village must be understood. We wish to stress that they are not just impo-tant buildings, but that they will guide the design character of the whole village, and we believe it is crucial for the "Character Area" work described below to be carried out in tandem with the building redesign.

We understand the budgetary constraints hindering any improvements to the public spaces in Waikanae, but we fail to understand the lack of willingness by Council, 3 years later, to continue the planning process begun in 2007. There is a need to develop a far more in-depth approach to the plans and a far greater, more comprehensive involvement by residents. This requires time and leadership, but no large capital expenditure. We believe the benefits of Council leading this work stem from their unique standing as the only entity that can act as a catalyst to begin the renewal of private spaces as well as public. And, as mentioned above, Council's progress on the upgrade of the civic buildings could be a great benefit if their wider impact is understood. Council has received reports in the past which attribute the lack of commercial robustness of the District to its poor connectivity. This is well demonstrated in Waikanae. We believe part of the lack of success of the commercial areas of Kapiti is due to a combination of factors including poor design, poor connectivity and poor visibility.

These all detract from their attractiveness as a destination and result in the downward spiral of low investment, high vacancies and general shabbiness. In our context, the primary purpose of planning under the RMA is to enable this community to use its physical and natural resources to enhance social and economic wellbeing. The District Plan cannot fix the economy, but it can remove unnecessary barriers to redevelopment and achieve a much better level of integration between development management, infrastructure planning and transport planning.

The reason for the lack of specific detail in our submission is a recognition that the major issue of the expressway route and its connections has yet to be determined. However, we are submitting to Council now to ensure that the matters we raise are included in and integrated with any planning for the local transport network associated with the expressway at the appropriate time. We can foresee issues relating to local cross-river access as well as access to and from the expressway which will come into focus as the expressway plans are firmed up. We will also be submitting to the process when the Draft District Plan and the Proposed District Plan are released.

Vector Ltd

INFRASTRUCTURE AND ESSENTIAL SYSTEMS

The Discussion Document - Infrastructure and Essential Systems discusses the provision of effective infrastructure and the influence of the District Plan on infrastructure placement and form. Vector's view is that the discussion document needs to refer further to existing infrastructure and the ongoing operation and maintenance of existing utilities. Further discussion also needs to occur in terms of identifying that inappropriate subdivision, land use and development can result in conflicts; and incompatibilities between activities may significantly compromise the maintenance and operation of regionally significant infrastructure.

In particular Vector would like to see discussion around:
- the effect development can have on the safe, efficient and effective operation of network utility infrastructure
- reverse sensitivity issues and existing infrastructure
- the ability for network utility companies to build, expand or upgrade existing infrastructure.

GENERAL COMMENTS

Vector owns and operates a range of energy and technology businesses and assets. Vector's submission focuses on making adequate provision for the regional importance of infrastructure.

Vector owns and operates over 2,300 km of high pressure gas transmission pipeline throughout the North Island as well as low pressure gas distribution pipeline within the Kapiti Coast District. These transmission and distribution networks provide essential energy to industrial, commercial and residential customers within the lower North Island.
Vector considers that a clear and concise policy statement which provides for the protection, and continued safe and efficient operation of regionally significant infrastructure is necessary to sustainably manage regionally significant physical resources. Vector suggests that the District Plan should recognise and define ‘Regionally Significant Infrastructure’. Such recognition and definition is provided for in other District Plans such as those adopted by Auckland City and Tararua District Councils.

In terms of recognising regional and inter-regional significant infrastructure such as gas transmission pipelines, Vector would support a District Plan which identifies and protects these from adverse effects. Such provisions would assist in maintaining the effective and efficient operation of these assets.

Vector also supports a requirement for local authorities to identify infrastructure and ensure its protection from inappropriate subdivision and land use, and to provide suitable integration between natural/physical resources and land development. Infrastructure, and particularly regionally significant infrastructure, is an important physical resource that enables people and communities to provide for their social, economic and cultural wellbeing, and their health and safety.

Gas transmission pipelines are coming under significant pressures from urban encroachment. Areas that may have previously been rural in nature when the pipeline was constructed are now becoming subject to residential growth. Land development in the vicinity of the pipelines may increase the emphasis on pipeline protection and safety requirements.

Vector does not oppose development and growth in the vicinity of transmission pipelines, provided that the necessary safety and operational considerations are taken into account. The operation and maintenance of the gas transmission pipeline system can be significantly constrained by the effects of encroaching activities and development (reverse sensitivity). This is therefore a key issue that will need to be recognized and addressed for under the new District Plan. This will ensure any potential adverse effects are appropriately managed and that the ongoing operational and maintenance requirements of the transmission pipeline are not compromised.

**LANDSCAPE CHARACTER AND HERITAGE, AND INFRASTRUCTURE AND ESSENTIAL SYSTEMS**

This submission addresses the apparently uncontrolled destruction of native and exotic trees in the Kapiti area by an electricity supply authority.

The Nature Coast has become a reality over the past few years as more and more birds are choosing to make their homes here and people are developing sustained interest in planting and managing native and exotic trees, significantly increasing the availability of trees both in public areas and in private gardens. This implies that as a local authority, and as the people who reside in this area, we have an interest in and a commitment to developing and maintaining natural aspects of the Kapiti Coast covering both flora and fauna, with particular reference to native species.

There appears to be an imminent threat to substantial numbers of native trees being felled without consultation with owners of the land on which these trees are growing as required by the Electricity (Hazards from Trees) Regulations, 2003.

The Kapiti Coast District Plan Review, especially the discussion document on Biodiversity, provides an opportunity to address some of the issues and help shape Kapiti for future generations. This is a laudable document but it does not actually address the issue of conservation of significant trees along road verges and local streets where the supply of electricity is still delivered via overhead lines. This needs to be addressed with some urgency.

The current District plan states in the section on Native Vegetation (iv) The disturbance, removal, damage or destruction ("modification") of naturally occurring indigenous vegetation, is a permitted activity, provided it is limited to: Modification by any network utility visitor to ensure the safety and integrity of any network utility or to maintain access to the network utility.

In 2003 Central Government enacted the Electricity (Hazards from Trees) Regulations and these became part of the law through an Order in Council at Wellington on 15 December 2003 This was one month short of seven years ago. These regulations which are binding to all councils and electricity suppliers throughout the country make a number of important statements. In fact they dictate how any process to deal with "hazardous trees" is to be carried out. While all of the regulations have purpose and weight, the ones that are of immediate importance with regard to the protection of trees in Kapiti are basically contained in Part 1 Control of Trees.

KCDC has very limited rules for the protection of trees throughout the district and none that we have been able to discover that address the issues of trees planted along road sides or on verges. The electricity supply authority(ies) that service the district appear to be able to ride rough shod over the owners of land on which trees are growing, and totally ignore the special character of the Kapiti Coast District as outlined in the Biodiversity Discussion Document.

This has been well evidenced in the actions to fell a very large and beautiful pohutukawa tree growing on the southern section of the council owned verge at 325 Rosetta Road. This tree (photograph below) has for many years given a great deal of pleasure to residents and visitors to Raumati Beach when it is in full bloom at Christmas time and has provided shelter and sustenance to many birds throughout the year. This tree was summarily felled in late September this year. This tree certainly met the criteria that is given in the regulations for: amenity value, in relation to a tree, means the natural and physical qualities and characteristics of the tree that: (a) contribute to people's appreciation of the tree or the area in which that tree is situated; or (b) provide desired shelter or desired screening to a property adjoining the property on which the tree is situated. When one of the residents who uses an adjacent drive to access her home challenged the person felling the tree she was informed that he had the right to do so and he continued to cut the tree down. The tree was carved off almost at ground level and there is now only a very ugly stump left. The operation has been very badly done and the tree stump left in a parlous state.

We have made enquiries and it seems that there was no consultation with any of the people who have homes in the vicinity of the tree before it was felled. We have not been able to establish whether there was any
consultation with KCDC as owner of the strip of land making up the grass verge. We have not been able to find any evidence of the prescribed process being followed with the levels of notification etc as outlined in the Electricity (Hazards from Trees) Regulations 2003 being given. We find this very disturbing and believe that KCDC has a responsibility to immediately address this issue and formulate policy and operational practice to reduce or eliminate this cowboy behaviour. It is very clear from the regulations that notification and consultation is an absolute requirement and if an amicable agreement is not able to be arrived at, then there are negotiation processes to be followed.

We do need to have electricity and it needs to be safely delivered. However, waiting until trees are of such a size that they pose a problem is not wise and there needs to be a well thought out procedure to ensure that this does not happen. The regulations address this but the steps that are dictated do not seem to be being followed. At no place in the regulations does it say that any tree that poses a problem should be cut down, it talks of pruning. Pruning as defined in the New Zealand Pocket Oxford Dictionary, (7th edition) 1984 says: Prune v.t. trim (tree etc.) by cutting away dead or overgrown branches etc., esp. to promote growth; lop (branches etc.) offer away; remove or reduce what is regarded as superfluous or excessive), remove items thus from. 4.8 The regulations use the word prune, not cut down. We are sure that some of those who have been guilty of zealously cutting down some of our trees will defend themselves by arguing that all they were doing was ground level pruning. Not good enough.

We have undertaken to develop a photographic dossier of trees (throughout Paraparaumu and Raumati in the first instance and this could be extended to the other areas in the district). Many of these trees are mature and magnificent. They enhance our district. They provide amenity value to people who live here, sustenance and shelter for many species of birds. However, where they are growing in our older streets which have powerlines rather than underground cables they appear to be able to be felled without consultation or consideration. This is not acceptable.

Some of these trees have been planted by private land owners, some have been planted by KCDC itself, and some have been here since before there was settlement in the district. A few are protected, but many of them are not. Some have been planted below existing powerlines and will become too tall over time - others have had powerlines erected over them and the trees will eventually be marked for the same fate as the Rosetta pohutukawa. This situation needs to be addressed with urgency. Saying sorry later or hiding behind an inaccurate interpretation of the law is not tenable.

We believe that actions listed below would help save the trees and eventually enhance the relationships between private and public owners of land on which the trees are growing, and the power supply authorities who are charged with the safe supply of electricity to people of this district. They are not comprehensive or in any particular order.

- There is a need for a comprehensive list of significant trees throughout the district.-These can be both native and exotic
- People encouraged to identify the trees of significance on their private properties. (Need to note the position of current power lines and clear areas that are adjacent to each tree)
- Need to photograph all possible significant trees on verges of public roads and how the power lines are currently placed.
- Need to list all streets that still have overhead lines and trees that are possibly impinging on them or will be in the future.
- A formula to be developed to allow these streets to be classified in order of priority for tree protection by placing the cables underground over an agreed period in an ordered manner
- More regular publicity needed to inform tree owners of their responsibilities and rights.
- Electricity supply companies need to ensure their staff both know the actual regulations regarding hazardous trees and how these are to be enacted including who is notified and when
- Both the owners of the trees and the electricity supply companies need to know the penalties for inappropriate pruning or felling
- KCDC needs to have comprehensive policies in place for protecting trees
- The when and where of planting new trees must be clear and complied with.
- There must be a mechanism for negotiating where trees may be planted if there is a possibility the trees will, in the future, become too close to existing power lines
- There must be a mechanism for negotiating which trees definitely need to be removed and for deciding that removal is the only option.
- There needs to be a publicly available set of charges for tree felling if the trees absolutely need to be removed.

139963 NZ Fire Service Commission INFRASTRUCTURE AND ESSENTIAL SYSTEMS

Thank you for the opportunity to provide feedback on the next stage of the Kapiti Coast District Plan review. The New Zealand Fire Service Commission (the Commission) on behalf of the New Zealand Fire Service (NZFS) welcomes the opportunity to continue to be involved in the Kapiti Coast District Plan review process.

During the feedback period for the Scoping Discussion Document, the Commission stated that it would like to ensure that the District Plan accurately reflects the operational requirements of the NZFS and its ability to adequately provide emergency services for the protection of people and properties within the Kapiti Coast District Council boundaries.

The key operational requirements for the NZFS are sufficient on-site water supply for firefighting purposes and sufficient physical access to properties for firefighting appliances. Council's Discussion Document entitled 'Infrastructure and Essential Systems' is therefore the most relevant to the NZFS, and this is the document that the Commission would like to provide feedback on.

Firefighting Water Supply. Council has stated that they intend to adopt NZS4404:2010 as the base document for meeting minimum engineering requirements. The NZFS's requirements for water supply and access are set out in NZS PAS 4509:2008 ‘New Zealand Fire Service Firefighting Water Supplies Code of Practice’. In terms of the requirements of the NZFS for reticulated water supplies, NZ54509 and 4404 are in alignment. However, for development that occurs in areas where a reticulated water supply is not available, there are no provisions within NZS4404 to ensure that a sufficient supply is available for firefighting purposes. It is just as important that development that occurs outside the reach of a reticulated water supply can still access a sufficient water supply in the event of a fire.

The Commission therefore wishes to highlight the importance of specifically referring to NZS4509 in addition to NZS4404 within the District Plan when forming the requirements for service provision in new development.
In terms of access for Firefighting Appliances, a minimum access width of 4 metres is required to enable fire appliances to reach a fire as well as allowing sufficient manoeuvring space around the appliance for firefighters. This allows the NZFS to respond to an emergency in a timely and effective way. This requirement of NZS4509 is however different to the 2.5 metre minimum which is required by NZS4404. The Commission wishes to highlight this difference and request that NZS4509 be the Standard of preference when assessing new development. The Commission would also like to highlight NZFS’s access requirements in light of Council's intended review of road information at reduced sealed surfaces, as stated on Page 14. The Commission notes that Council will not reduce sealed surfaces to the detriment of emergency and safety needs, and therefore again wishes to highlight the 4 metre minimum access width which is necessary in order for fire appliances to reach a fire.

The Commission asks that KCDC consider the issues addressed in this letter as they move to begin the draft stage for the reviewed District Plan. We look forward to working constructively with the Council to develop a district plan which ensures adequate provisions for fire safety and promotes the health and safety of the people and communities of the Kapiti Coast District.

139964 David Roil
NATURAL HAZARDS AND MANAGED RETREAT

As demonstrated by the Christchurch quake the risk to Kapiti district by shaking and liquefaction is far greater than by unidentified fault trace danger. Kapiti District is largely built upon saturated ground which is as sensitive to liquefaction as the ground of the eastern suburbs of Christchurch.

The mountains separating Kapiti from the Wairarapa are the total fault zone. They are riddled with fault lines, (not just the fault traces which the KCDC have over zealously highlighted in our district plan), greatly increasing the chance of a Magnitude 7+ within 30 - 40km of Kapiti (Darfield to Christchurch approx 35km).

KCDC needs to learn the lesson from the Canterbury Quake that liquefaction of most of the Kapiti District residential and commercial area is a far greater hazard than the misdirected efforts of building restriction around the immediately adjacent major fault traces. The frequency of occurrence of a major earthquake affecting ALL of the Kapiti District is many times greater than possibility of a single fault trace movement. Note that only a very few Canterbury structural damage cases are due to fault trace movement.

KCDC need to use far greater emphasis on protecting our infrastructure from the effects of liquefaction, particularly overseeing expressway design to ensure that it is an improvement not a detriment to our community's infrastructure.

The expressway geotech survey information is expected to be available shortly. We need assurance from the Mayor and council that this information will be available to the community before the next stage decisions are made and that suitably qualified professionals will view this information on behalf of the KCDC not just NZTA.

INFRASTRUCTURE AND ESSENTIAL SYSTEMS

1. The expressway is going to have a major effect on ground water and natural drainage. The proposed well supplementary system for the Waikanae River summer flow may be reduced or cut off by the dewatering and damming of the expressway structure.

3. Expressway influence on east-west services, ground water movement.

140014 Bob Burns
BIODIVERSITY

Yes, you have summarised the issues accurately. You are fortunate to have a lot of people interested and concerned in the environment in Kapiti.

I think the new ideas for the DP Review are on the right track.

a) Maybe more could be gained from the community environmental restoration groups (20 in 2009) if Council provided specific direction, materials/funds etc eg. to monitor population levels of species, infestation rates of pests etc for particular sites.

b) Need to engage another biodiversity specialist, or second (pay for) one from QEI to manage and enforce conditions of covenants for those that the QEI Trust cant manage.

c) I dont think coppicing in NZ is a practical idea. It is labour intensive, needs flat or gently sloping ground for access of small vehicles, takes 10 to 15 years before harvesting (say 100mm dia for firewood), would need large forests to be self sustaining. The closest you have to coppicing is harvesting Pinus Radiata in the Kaiangaroa Forests on the Taupo plains - the waste in firewood that is ground back into the earth is enormous. I see a bit of coppicing in my country walks outside London - Epping F: West Ruslip Woods, Ashstead Common and others, it is a part of the general maintenance of woods but I dont think it is for a commercial purpose. Sites would need to be fenced to keep deer and cattle out.

The Damocles sword hanging above Kapiti is the Express Way. Any "Green Networks" or Corridors are likely to be severely compromised by this. Can a biodiversity expert and a sociologist be part of the Alliance planning this work?

LANDSCAPE CHARACTER AND HERITAGE

All sections are well presented (if a little wordy and repetitive at times) and cover the important issues likely to be encountered in future.
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<td></td>
<td></td>
<td>A positive and proactive Review; Council is aware of and protective of the region's assets and natural values - landscape, character and heritage. Landscape Character and Heritage. It does seem that the proposed Expresway route through Paraparaumu to Peka Peka flys in the face of almost all aims and objectives of this section. Now that KCDC is part of the Expresway Alliance I hope your views can be strongly put to affect major changes - starting with the basic premise that a high speed expresway is needed!</td>
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</table>
| 140015 | Andy Reisinger | NATURAL HAZARDS AND MANAGED RETREAT  
An excellent section and should be compulsory reading for all land owners in District. If people have enough warning, say a generation or two (?!), they cant object to costs of relocation etc. |
| 140016 | Robin Reynolds | NATURAL HAZARDS AND MANAGED RETREAT  
The discussion paper on natural hazards and managed retreat is excellent and timely. Given the inevitability of long-term sea-level rise, and the large range of potential future changes, where an increase even of 2m by 2100 cannot be ruled out entirely, a risk-based approach as advocated in the discussion paper is appropriate and fully consistent with current climate science. It also serves well the need for greater attention to the policy challenges and long-term implications that sea level rise presents for developed coastlines.  
Yes, I believe the steps advocated are on the right track. Key points are a risk-based approach based on multiple hazard zones, and the need for greater collaboration and coherence between DP and Regional Plan rules so that retreat provisions can be applied not only to new developments but also existing buildings.  
It must be emphasised that due to the on-going nature of sea level rise, hazard zones can never provide static, reliable certainty of buildings that are located behind those zones. They are only temporary measures that must be adjusted based on new scientific findings and progression of sea level rise. They must not be used in a way that increases lock-in of buildings landward of fixed hazard lines. In addition, the most critical steps are to ensure public disclosure of the risks to existing and future properties for a wide range of sea level rise scenarios (up to 2m), and management of an on-going public discussion and awareness raising of the implications of sea level rise for the public amenities and environmental values that beaches present, and the consequences for those values under alternative "protect and hold the line" or "adapt and retreat" policies. |
| 140017 | Chris Ineson | NATURAL HAZARDS AND MANAGED RETREAT  
a) Damage to Te Horo beach - north of Mangone stream to Otaki River. This is a pebble bank built up by the Otaki River and is prone to the issues raised in the Review paper - high seas, flooding, erosion and its consequences to property and personal safety/life.  
b) The bank is relatively stable and a very effective barrier to the sea and erosion but it is under considerable threat from the practice by vehicles - 4 x wheel (mainly SUV), motorbikes and quad bikes - constantly riding over it despite the warning at the north end of Sims Rd that this is prohibited. This needs to be addressed in the Plan and enforced otherwise it is only a matter of time before irreparable damage is done to the bank, the road and surrounding property from tidal flooding.  
b) Flooding of the Mangone stream. Recent floods that covered Te Horo Beach Rd just north of Pukunamu Rd highlighted the danger to traffic of inadequate stop bank management. The road flood was caused by water flowing over the top of the low lying river bank. It forced local and visiting traffic to ford the flooded area or abandon their travels. The Plan needs to incorporate reference about raising the level of the river bank in this particular section of the road.  
The situation was aggravated by the local dairy farmer who pumped many thousands of litres of water from his flooded paddock into the stream at the point where it was flooding the road. This action was potentially dangerous as it could have resulted in vehicles sliding in the mud from the paddock into the river. Some form of contingency control needs to be built into the Plan to prevent this happening again.  
c) Prevention of fires. The pebble bank mentioned above also consists of driftwood that over the years has deepened and compacted. Because of its depth and dryness it is a serious fire risk that once started is very difficult to contain/put out. A prohibition from lighting fires (under any circumstances) needs to be addressed in the Plan and enforced. |
FOOD AND RURAL PRODUCTIVITY

a). Dairying and the environment. The growing number of dairy cows has resulted in a number of adverse consequences. For instance the local herd has grown from 300 (approx) to 500 + (approx) with a noticeable increase in odour at milking times and when effluent is discharged onto the land. Aside from odour, the constant discharge of effluent (solids and liquids) must have a degrading effect on the aquifer and the quality of downstream water to neighbouring properties.

Other factors have emerged: The first is a significant increase in the fly population (possibly aggravated by a pit located north of the dairy farm for dead cows). Second is the lack of water for the downstream bores during summer due to the dairy farm's practice of drawing it off for irrigation (understood to be approx 6m litres a day).

Third is the effluent on the road at the point where Te Horo Beach Rd bridge crosses the Mangone stream. This is the area where the dairy herd crosses the road to the paddocks adjacent to Pukunanu Rd. It is a high effluent area and aside from making the road dirty and slippery (and a possible danger to vehicles and cyclists) it is a high pollution area as it washes into the Mangone stream and into the sea (popular fishing and boating area).

Further, the amount of weed in the river has grown significantly from the effluent run off from the dairy farm which is clogging up the river and, as a bye product, has affected the number of ducks etc using it. The result of the above has degraded the quality of the water in the Mangone stream and the integrity of its banks.

These issues need to be addressed in the Plan as it is evident that farm practices that impact adversely on the environment and the public have to be planned, improved, managed and monitored.

140019 Rawiri Faulkner NATURAL HAZARDS AND MANAGED RETREAT

The natural hazard issues have been detailed effectively. The information is concise and up to date.

I feel the Plan fails to give consideration to the following issues:
- the role of tangata whenua in natural hazard mitigation and planning
- the contribution that Iwi/Maori can make to planning in this area
- defined processes to gain information and understand the concerns/ opportunities to Iwi/Maori groups.

There is lots of research which explores the contribution of traditional knowledge (Mātauranga Māori) can make to hazard planning. Given that marae are often used as places of refuge during natural disasters as well I would encourage the Council to work with Iwi/Maori to explore what contribution can be made and to demonstrate a clever commitment to understanding issue of significance to Iwi/Maori. This can be done through developing a relationship with key organisations (Wananga, Runanga, key individuals) and investigating what has been done at a national level.

140029 Matthew Wyatt NATURAL HAZARDS AND MANAGED RETREAT

Question: Two-Comments: I do not agree with the general statement that managed retreat is the only viable option for existing residential coastal settlements. It appears as though this statement will be used as a blanket tool to prevent the construction or maintenance of sea walls to protect existing settlements. Given how flat the Kapiti Coast settlement is we could expect flooding many kilometers inland with not protective devices? At what point do we protect? The idea that we don't protect ANY private residential property is not acceptable. I do not agree that sea walls are not viable options for some areas. Sea walls are not uncommon overseas and can be effective. This needs further review and analysis.

Question: Three: Some review of operational delivery would be valuable. How do we reduce red tape and local authority size and costs.

140034 Lisa Adlington LANDSCAPE CHARACTER AND HERITAGE

I believe it is unreasonable to continue with present sign rules that exclude an owner fro having a colour 1200x900 sign. I have come to this district from Auckland. The rules on signage are simple but fair.

I would like to see an owner having the right to one sign per property for the duration of their agency – the sign to be no larger than 1200x900 and to display their property details of choice.

140035 Peter Meaclem LANDSCAPE CHARACTER AND HERITAGE

I believe that the current District Plan does not truly reflect todays current change in the Real Estate market. As an owner of property and ratepayer in the District for over 25 years I would appreciate the ability to promote my own home within reason by using quality signage on the street that is both professional and secure. I believe the signage promoting the property should be allowed to be 1.2m2 if it is a pictorial sign. They should be able to be double sided and with the increased days to sell in the market they should be able to be erected for the duration of the agency. Currently it is only Auction and Tender signs that are able to be erected because they have a closing date however owners should have the ability to make their own choice of marketing form but still be able to promote their property to the very best advantage. The signage should be in solid frames to inhibit vandalism and damage by the elements. While these are only minor changes I believe they accurately reflect an owners ability to reach an ever shrinking real estate market. As Realtors we have a responsibility to our sellers to promote their property to the best of our ability.
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<td>140037</td>
<td>L M Henderson</td>
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<td>Signage Regulations</td>
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<td>Auction or tender properties are usually signed up with an agent for 3 months sole agency. It is not unreasonable for the sign to stay up for that period and if the property is not sold within that period all signage to be removed. If and when the property market pick a shorter time may be appropriate.</td>
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<td>140038</td>
<td>NZ Historic Places Trust</td>
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<td>Thank you for the opportunity for NZ Historic Places Trust Pouhere Taonga (NZHPT) to provide comments on the Kapiti Coast District Plan Review, Issues and Options. NZHPT is an autonomous Crown Entity with statutory responsibility under the Historic Places Act 1993 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. The Historic Places Act also confirms NZHPT's lead historic heritage agency.</td>
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<td>The Kapiti coast is rich in history and historic places that are inseparable from the community's sense of place. Along with the natural features shaping the region, including Kapiti Island, the beaches and backdrop of hills, Kapiti's built form and Maori heritage are significant contributors to its identity and character. These features and places of significance help us to remember, to learn and to share our stories with others. They provide inspiration for artistic creativity, a foundation for tourism and economic development. NZHPT provided feedback to Council in March this year scoping the issues for the discussion document, a copy of this feedback is attached. NZHPT is supportive that the Kapiti Coast District Council is undertaking this comprehensive District Plan review. NZHPT is supportive of this comprehensive approach to the historic heritage review. In particular strengthening the heritage identification and protection hierarchy, special character areas, heritage precincts, wahi tapu and using design guides as a regulatory tool.</td>
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<td>The 2003 RMA amendments elevated historic heritage to a matter of national importance under Section 6f of the RMA directing Councils to recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development. Additionally these amendments include a comprehensive definition of historic heritage, where previously there was none. The definition is: historic heritage- (a) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities: (i) archaeological: (ii) architectural: (iii) cultural: (iv) historic: (v) scientific: (vi) technological; and (b) includes- (i) historic sites, structures, places, and areas; and (ii) archaeological sites; and (iii) sites of significance to Miori, including wahi tapu; and (iv) surroundings associated with the natural and physical resources</td>
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<td>Given the majority of the Kapiti Coast District Plan was made operative in 1999 the historic heritage provisions may not reflect the 2003 RMA amendments. The elevation of historic heritage within the RMA. needs to be taken into account in this current review, particularly with regard to assessing the current heritage inventory and the robustness of heritage rules. In particular, NZHPT notes that currently there are no rules for archaeology in the Kapiti Coast District Plan and no rules for interior protection of historic buildings. These are important considerations for the district plan review. NZHPT provides guidance to Councils undertaking district plan reviews within the Sustainable Management of Historic Heritage guidance series. A full copy of the guide is available from the NZHPT website <a href="http://www.historic.org.nz">www.historic.org.nz</a> and a copy of Guide 3:District Plans has been included with this letter. The guideline provides best practice heritage provisions including details on heritage inventories, objectives, policies, rules and methods. Additionally we have included discussion papers on: heritage landscape values that may be useful for the Council's approach to historic heritage. NZHPT understands that Kapiti District Council heritage fund has provided $27,000 in 2009 as a heritage incentive fund for owners, of up to $5000 per applicant. This District Plan review is a good opportunity to review the fund, and endeavour to increase the annual allocation provided. Under section 74(2)(a)(ii) of the RMA matters to be considered by a territorial local authority include the relevant entry in the Historic Places Trust register. There are some registered places, not included in the District Plan which include: * Te Kahuoterangi Whaling Station, Te Kahuoterangi Whaling Station, Te Kahuoterangi Stream Mouth, Kapiti Island, Category I (7662), registered 30 June 2006 * Ngatiawa Bridge, Mangaone, Reikorangi, Paraparaumu, Category II (7189), registered 23 June 1994 The 2003 RMA amendment includes Section 6e the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga. There are some sites of significance to Maori in the District Plan. There is currently one registered wahi tapu site with NZHPT that is yet to be included in the heritage listings for the district plan which is Te Pou 0 Tainui. NZHPT would support the listing of this site of cultural significance to Maori in the wahi tapu listings of the District Plan. During this district plan review process Council needs to ensure tangata whenua values and sites are reflected in the review. Additionally any relevant iwi management plans or other documents need to be taken into account.</td>
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The Kapiti coast has over 200 recorded archaeological sites listed on the New Zealand Archaeological Association records. It also has a high number of unrecorded archaeological sites that are not necessarily visible on the ground surface particularly, middens, ovens, wetland deposits and burials. NZHPT advocates that Kapiti District Council subscribe to ArchSite, which is the NZ Archaeological Association database for recorded archaeological sites in New Zealand. These sites can be reflected in the heritage chapter of the district plan. ArchSite is GIS format and is 'live streaming' therefore has the most up to date information available for archaeology in New Zealand.

For any works to an archaeological site the archaeological provisions of the Historic Places Act 1993 will apply. Subscribing to ArchSite will help Council meet their legal obligations under the HPA and the RMA. The district plan currently lists many important archaeological sites for information purposes only in schedule 1.2 Archaeological Sites. There is a general lack of provisions in the plan to deal with archaeology. Some parts of the plan do allow for accidental discovery protocols, which NZHPT supports, however more could be done to protect the important archaeology in the region.

In particular Council needs to ensure that all pre-1900 archaeology is addressed, not just that archaeology relating to Māori. There is often a tendency in district plans to overlook pre-1900 European archaeology such as that relating to pre-1500 buildings, pre 1900 town centres, and infrastructure such as the main trunk line, whaling and trading sites and farming and timber milling. Clear direction and information needs to be given in the district plan to ensure that such archaeology is allocated an appropriate level of protection.

Archaeology is predominantly governed under the Historic Places Act (1993) which manages the discovery, damage, modification and destruction of archaeological sites, by investigating, monitoring and issuing archaeological authorities. However, the archaeological authority process is closely linked to the RMA with resource consents often triggering the need for an authority to be obtained. In the event that there is known archaeology on the site, or reason to suspect that archaeology is likely to be discovered, an archaeological assessment should inform the consent process.

In these cases an archaeological authority will be required before consent can be given effect to. It is best practice that the resource consenting process runs congruently to the archaeological authority process to minimize delays to applicants and streamline processes. It is prudent to make Council staff and plan users aware of the triggers for an archaeological authority and the NZHPT recommends adding policies and an advice note to certain sections of the plan to inform readers of their obligations (see last page of District plan guidance attached in appendix 1).

NZHPT looks forward to working with Council towards an improved District Plan for the Kapiti Coast District that gives effect to the matters of national importance under part 6E and 6F of the Resource Management Act in respect historic heritage.
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<td>140047</td>
<td>June Rowland</td>
<td><strong>GENERAL COMMENTS</strong></td>
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<td>In mid 1990 a group Kapiti Environmental Action Inc was established. This was in response to the proposed introduction of the Resource Management Act. As a member of KEA I was involved over many years in all the preliminary work towards the 1990 District Plan. With many others I helped reply to all nine Discussion Papers. This started in May 1993, finishing in February 1995 when the Draft Plan came out. Then there were submissions, leading to the Proposed Plan in November 1995. I am pleased to have the opportunity to submit on this Review. The documents presented to us are well set out in a readable manner. I look forward to greater detail in subsequent papers. Council has achieved so much in the environmental area over these ten years of the life of the District Plan. I am pleased to have been able to work with Council bringing about a few of these changes.</td>
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<td><strong>BIODIVERSITY</strong></td>
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<td>Pressure should be applied for National Policy Statements for Biodiversity (essential) and Updated coastal policy statement. NPS Biodiversity was mooted at least twelve years ago. This would be a statutory document and have the teeth a strategy lacks. KEA found the National Coastal Policy Statement of great value in our submissions. Where has the reviewed coastal policy statement got to? Councils would not have to grapple with these issues individually if there was a NPS. Advice, education etc cost money and do not always work. Monitoring is the answer State of the Environment monitoring and reporting, Agree all these points but of course involves money and time. So important to the biodiversity future of our district a strong case must be made for the financing of this monitoring. All these points require the services of professional people. Much has been lost in the past because KCDC did not employ any ecologically trained staff to advise the decision - makers. Agree that the protection of the forest edges is vital. Protecting restoration areas. Agree identify areas suitable for restoration. Again a National Policy Statement would be of value. Ecological Sites Agree they need to be resurveyed. Edge effect can be devastating.</td>
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<td>The three Management Incentive schemes created in 2001 have been excellent and must continue. Monitoring is essential and funds must be allocated for staff to do this. There has been noticeable improvement since we appointed a biodiversity officer. The eco-site survey was a mammoth and expensive exercise but of great value and more follow - up is now vital. Mitigate can be an evil word. Agree about the fragility of NZ biodiversity. Subdivision of primary forest remnants can be a disaster. Example of ANDREWS POND. KEA members were present when Campbell Andrews was discussing his proposed development of this land. DOC explained the importance of protecting this manuka spagnum bog as it was unique. KCDC in its wisdom despite this SNA declaration gave permission for the Golf Driving Range to be built resulting in filling in part of the pond and raising the adjoining land. The manuka died. It is a pleasant wetland area but its original status has gone. Kapiti Environmental Action has despaired with some developers' vision of mitigation. Agree clear objectives, rules and standards are needed but it is a difficult issue. During the work for the formulation of an Open Space Strategy was there reference to the survey done by Leon Kiel and Linda Kirkmeister of the whole district to protect open space when future developments came before council for approval. The harvesting of plantation forests can be a problem in many ways. There is certainly some great natural regeneration in local pine forests and certainly owners could be encouraged to retain it. However apart from advice financial incentives would be essential.</td>
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<td><strong>LANDSCAPE CHARACTER AND HERITAGE</strong></td>
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|        |                         | Landscape is of great importance. It is what we see during our daily lives and may affect our general perception of life. Fortunate to have a range of hills to the east which can give us a feeling of peace. It is desirable but not always possible to ensure these hills are preserved in somewhere near their natural state. Kapiti Environmental Action were very aware of the need to preserve the escarpment to the east of Paraparaumu. The area between Poplar Avenue and Lynches Crossing was covered with large stands of kohekohe / Titoki forest and made a wonderful backdrop to the coastal dwellers. At the time of subdivision KEA supported KCDC in their bid to retain this as a reserve. Later, Council co- operated to allow a walkway along the top. Building has been permitted along the face further north, relatively discreet except for the huge white monstrosity at the top of Panorama Drive, visible both from the plains and Valley Road. Much of the dune landscape has been lost in spite of developers assurances that they were merely massaging the dunes. Protection of landform and view shafts in the Paraparaumu Centre. These policies and standards relating to the dunes are applauded. Vigilance will be necessary. The Council has developed a series of design guides which are very professionally presented but are not incorporated in the District Plan. Could these be made mandatory by inclusion in the Plan? It is good that Viewshafts are being considered now. There is a wonderful view coming north from MacKays Crossing to Poplar Avenue looking east across parkland and dunes. The kanuka planting along this stretch is unfortunately obscuring this view point. Some years ago we had a districtwide view from the reservoir at the top of Riawai Street. Pines took over. Now these trees are going this lookout could be re-instated. The operative WRPS Landscape section contained excellent Policies but when the Management Plan was released there was such pressure from landowners it was withdrawn. Therefore I understand the difficulties in
The draft discussion document identifies human activity as a major contributor to the loss of biodiversity within the District over a period of several hundred years. In the past ten years the District's population has grown by about 20% so any consideration of the issue of protection of biodiversity must be undertaken in the context of a human environment which, in the absence of changed behaviour, is likely to bring increased pressure on the remaining biodiversity.

It is important to look at the issue in a dispassionate way. While the document understandably focuses on protecting and enhancing biodiversity, clearly there is a need to recognise that the impact of the growth trend in population may still mean that some incremental loss of biodiversity may be inevitable.

On page 4 a text box contains the following statement:

At one level it can be argued that “Biodiversity is central to what sustains us: it is the life on which our own lives depend.” Without some level of biodiversity we would be in a position of significant potential vulnerability and could quickly perish if adverse circumstances occurred. But at another level it can equally be argued that only through the sacrifice of some biodiversity has it been possible for the Kapiti Coast District to develop in ways that made it possible to support the population of today. Only by substituting new elements into the local biodiversity has it been possible to feed, cloth and house the almost 50,000 people that now live in the District.

Of course in today's complex human society that last statement oversimplifies what actually takes place but the underlying truth remains; some biodiversity change is inevitable in an environment experiencing such rapid population change. Some selectivity must be exercised in making the choices about where to direct Council's efforts with regard to protecting, enhancing or sacrificing remaining biodiversity.

The document refers to the responsibility which the RMA places on local authorities to protect significant areas of indigenous vegetation. But this highlights how easy it is to lose sight of the important need to balance protection of the environment with legitimate development. The requirement in the Act is to protect areas of “significant indigenous vegetation”.

In the Kapiti Coast District there are a number of areas of indigenous vegetation which certainly warrant the description significant. Some of these are quite small and therefore likely to be vulnerable to the pressure which the District's growing population will bring. But the District is also blessed with some large tracts of indigenous vegetation which provide a measure of protection to the biodiversity contained therein because of their size.

I believe that the appropriate response for the Council to each of these classes of land is quite different but do not see recognition of this in the document.

Small vulnerable areas containing remnants of significant indigenous vegetation need a concerted effort on the part of the Council to ensure that an adequate regulatory framework exists to facilitate the protection of the areas' biodiversity. This should be accompanied by a set of measures making available assistance and encouragement for the landholders to enable them to carry their associated burden of responsibility. The aim should be to let the landholder know that Council is there to help them achieve a common goal of protecting vulnerable areas to enhance or sustain biodiversity in a threatened environment.

Large areas of forest are also likely to contain areas of significant indigenous vegetation. While it may be just as important that these areas are sustained, the very scale of the surrounding forest will often accord a level of protection which is absent from small remnant areas. Accordingly there is less call for explicit actions such as fencing, weed control or intensive pest control. This is not to say that no commitment should be made but that at least the level of activity and expense need not be as high as in other more vulnerable areas. What this should also mean is that there is less need for Council to interfere in the process of land management of areas contiguous with large forest areas because such activity as plantation forestry and farming pose less of a threat to the integrity of the large forest biodiversity than occurs where the vulnerable area of significant biodiversity is small. There is a need for care in developing a regulatory framework in this area. I believe there is widespread support within the community for retention of a natural environment as a backdrop to the more modified areas of highest human density. For the people who live in and own the backdrop areas such as the Tararua foothills they must balance their need to sustain the productive capacity of the area with the rest of the community's desire to enjoy a natural backdrop. Council's attempts to meet the broader community's wishes sometimes appear to pay little heed to the rights and aspirations of the landowners.

A simple example can be found in the rules which Council have implemented to prevent continued wholesale removal of the area's original forest vegetation. Of course a blanket ban on removing indigenous forest species comes up against the problem of indigenous woodlots and plantations established for productive purposes. If, in an effort to protect indigenous vegetation in general, the Council requires those who establish woodlots or plantations of indigenous species to register such activity (as is the case in KCDC at present) then, perversely, the outcome may be that people are deterred from planting indigenous species and will instead plant single species plantations of Pinus radiata with consequent reduction in biodiversity. The incentive which the registration process actually puts on the landowner is to plant the species which do not need registering and to ignore the species which are subject to regulatory imposition.

The document raises another important issue, the need for better monitoring of indicators of biodiversity. Without effective monitoring one cannot state with any certainty whether the efforts being made are achieving worthwhile effect. We feel that the efforts of a few landowners in planting trees and plants which attract and feed birdlife at different times of year is having a noticeable effect on the numbers of birds being seen in the immediate area. This is too small an area to be able to make any comment relating to the wider District area. But one can draw some conclusions from the efforts of one couple who have maintained a humane possum trapping operation for a number of years complete with records of the number and composition (old, young, male, female) of those caught. Their effort stands in total contrast to DOCS failure to include a large area of the Tararua forest in their poisoning programme and KCDC's failure to accord possum control any status even though in this area they are clearly a major biodiversity threat and the area falls within the District's water collection area. I hope that the current review may see a change in this attitude as part of a renewed focus on sustaining and enhancing biodiversity in the area.

District Plan Review Options

While I agree that more effective monitoring of the state of biodiversity is desirable, the wish list set out on page 12 suggests to me that if all those forms of monitoring are undertaken we can be sure that what will be...
recorded will be the continuing decline in biodiversity because there will be no money and insufficient time to address the real problems of the most immediate threats. We need a balanced programme of involvement by Council with community groups and landholders in areas of greatest vulnerability, all working to achieve some improvement in the situation.

We also need to recognise that productive effort is required to sustain the ability of the Council to play its role. It is, after all, the rates generated from those productive efforts that finances Council. That role will be self-defeating if it focuses only on the creation of a regulatory framework to impose outcomes. I welcome in the document recognition that incentives and assistance should form part of the effort. The desired outcomes will only be achieved if the community decides to make changes in behaviour and put effort into it as well.

If the focus on regulated outcomes causes landholders to believe that their Council is seeking to undermine their best efforts to make productive the asset they have invested in then I am sure the overall outcome will be failure. Whereas, if the landholder feels that the Council is alongside encouraging, enhancing and valuing individual efforts, then success is much more likely.

The document does recognise a role for providing incentives and assistance to help encourage these changes in behaviour and this is to be commended. However, it seems to overlook a central fact. What we are trying to achieve is an improvement which produces benefit for all, in effect a public good. And this public good is being purchased in large part by imposing extra costs on, or restricting the range of activities which can be undertaken by, private landholders who are directly impacted by these efforts. Some consideration of compensation should be part of the policy where the benefit for the whole community is at the expense of a few.

Finally, I was surprised to find coppicing being put forward as something which might be encouraged. Firstly, because while much of the earlier comment focussed on encouraging landholders to restore indigenous forest, Most indigenous forest species in New Zealand do not offer good coppicing potential and many species that do offer coppicing potential have characteristics which in New Zealand may result in undesirable side effects. The focus of coppicing on monoculture plantations sits uncomfortably, I would have thought, with the aim of sustaining or enhancing biodiversity. And a form of forestry which aims to produce more firewood than timber would seem to sit uncomfortably with Council's objectives and policies regarding the broader question of global change and associated issues.

LANDSCAPE CHARACTER AND HERITAGE

I am pleased to see the recognition given on page 7 to the fact that "The values of rural amenity and character are often correlated with the primary production use of the land. Landscape, character and heritage issues and impacts should be considered in conjunction with the retention of the productive potential of rural land and sustainable activities, including food production, ecological regeneration and, where suitable, energy generation."

In the case of our own property, while the most obvious landscape feature is the backdrop of forested hills it is clear, from many people that visit the area, that the reverse view looking towards the coast and Kapiti Island with the neatly ordered farmland in the foreground affords them at least as much pleasure as the view up to the hills. The contribution which man's activity has made to the overall amenity of the landscape is significant and it is pleasing to see recognition in the document of the importance of keeping this in mind as the issues of landscape, character and heritage are considered.

Suggested Approaches for District Plan

I agree that identification of the landscape, character and heritage values is important so that those features which are valued can be widely known and adequately protected. Accurate identification of the areas possessing those values will also assist in removing the uncertainties which currently attach to some landscapes where inadequate definition leaves status uncertain. At present there are some rather obvious anomalies. Part of our own property is designated as outstanding landscape for reasons which defy rational analysis.

I do have concerns about some of the suggestions that subdivision and planting forms should follow natural land forms. While this should rightly be a consideration I do not believe it should be considered an overriding requirement. As an example, woodlots are often planted for multiple purposes. One of these may well be to provide wind break protection for more exposed elevated parts of natural ridges. To suggest, as the illustration on page 15 shows (drawn from the Rural Subdivision Design Guide), that best practice will mean that most woodlots should completely cover the landform is fine. But to take a further step and suggest that applying such guidelines should become a formal part of the District Plan with its regulatory focus is a step too far I think. Incorporating landscape and character design guides in the District Plan risks replacing the potential disarray of individual tastes with the boring mediocrity of the rule maker's uniformity.

I support the suggested approach of better ensuring access to public landscape. But such a move must be undertaken with care when the landscape is privately owned. In the case of significant landforms at the interface between the foothills and the Taranuas proper it is often the case that the foothills area is privately owned and the Taranuas is part of the public estate. Care is required to ensure that the private owners still are able to manage the public access to their land so as to protect the productive activity in which they are engaged.

FOOD AND RURAL PRODUCTIVITY

General Comments

The issues identified in the document are significant. The focus on resilience rather than immediate self-sufficiency is important. We need to remember that the concentration of productive effort into specialised production units has been the major contributor to the growth in New Zealand and World production and thereby the ability to feed the increasing world population. The paper is to be applauded in its recognition of the impact which today's changing economic environment may have on present structures of production and distribution. However, its focus seems too narrowly set on looking for initiatives which the Plan can generate to improve local resilience while largely ignoring the contribution of those best able to implement the modifications to forms of production in the District, namely the landowners and individual members of the Community who are directly involved in production.

While the focus of this particular paper is on productive capacity within the District a major influence and impediment for the individual rural landholder is the mixed messages which come from Council in the form of diverse goals for landscape protection or enhancement, biodiversity protection, ecological concerns or visual amenity concerns. These messages, and the regulatory framework which accompanies them, often impact on rural landholders in ways which actually undermine their ability to respond to the evolving economic environment and inhibit, or even prohibit, their ability to build resilience into their productive efforts.

In making planning policy in this area it is important that Council recognise both the resource which experienced rural producers represent and the rights which these landholders have to make productive use of the land resources they own. The paper points out that land buried under the concrete and tarmac of an urban area is not easily reclaimed for future food production if that should become necessary. Grazing land which has been allowed to lie dormant for some time can be relatively easily reactivated to more productive use if the opportunity or need arises.
There is a need for more explicit recognition in the Plan framework for the right of the rural landholders to continue their productive enterprise, to modify it as the economic environment changes and to be enlisted in the wider efforts to safeguard the environment of the District. There seems to be a perception in some quarters of the community and the Council that rural landholders do not care about the environment whereas the reality is that these landholders are often those most aware of their long term dependence on the quality of the environment as a major factor influencing the success of their productive enterprise.

A simple example will serve to illustrate the point. Where a landholder wishes to modify their grazing enterprise by planting woodlots in suitable marginal areas they are free to do so except that if they choose to establish productive woodlots of indigenous species they must register that fact with Council or else be likely to be prohibited from harvesting the crop when it matures. If the trees are exotics no such rule applies. The actual incentive created by a policy aimed at protecting indigenous species is to plant only exotic species of trees in farm woodlots and thus avoid the need to involve the Council. But the farmer who nevertheless establishes a woodlot of indigenous species is likely to find themselves prohibited from pruning the trees or exercising other silviculture management practices under another rule supposedly aimed at protecting indigenous trees.

The landowners are those who are best placed to come up with the ideas and expertise to maintain the productive resilience of the District. Council should focus rather on creating an environment in which the landowners are able to exercise that judgement.

Rural residential clusters have some appeal but raise in more concentrated form the issues which Council and developers already wrestle with, namely how to assure an adequate supply of potable water and effective non-polluting disposal of human waste in rural areas where these services are not normally offered by Council. It may be that Council needs to look at this policy in the context of identifying areas where Council services can be economically extended to service such a cluster. To the extent that proposals are located in areas of highly productive soil types much of which is in reasonably close proximity to Otaki it may be possible to apply this approach to overcome a common rural subdivision problem.

Many urban people have an emotional attachment to the idea of being able to grow their own vegetables, keep their own bees and poultry (even pigs). But the reality that often quickly sets in is that the garden becomes a weedy eyesore, a bee sting is still as painful in town as in the country, poultry close by are still noisy and most pigs kept in such an environment are still smelly and attract flies. The small vegetable plot in an urban setting can be attractive and a pleasant outlet for leisure time activity but the professional producer of both fruit and vegetables knows much more about how to produce good quality produce with minimal residues. The professional farmer knows more about good husbandry and animal health than the urban dweller or lifestyle block owner. Council need to be careful about the extent that it taps into the emotive dreams and should instead concentrate on ensuring that the regulatory framework put in place is conducive for productive enterprise rather than encouraging the dreams.

In its approach to rural residential development Council should recognise a need to cater for people's need for privacy and peace and quiet while making it possible for the minority who actually want to make a productive unit out of their lifestyle to do so. This can best be achieved by allowing Lots of varied sizes in rural subdivisions and ensuring that regulatory inhibitions are limited to matters of true need not just to serve the purposes of emotive idealism.

Waikanae appears to have been excluded. There is no mention of any heritage sites in Waikanae – refer to page 16 of landscape, character document. Nothing on the preservation of the early timber mills in the Reikorangi Valley. No mention of this historic significance of the railway on the development of the coast – particularly that of the local Maori gifts to allow the establishment of railway.

The Kapiti Coast Museum in Elizabeth Street, Waikanae is a community asset operated by a group of volunteers concerned with the preservation of local and social history together with the Museum's unique section on telephonic history. Housed in a decommissioned Post Office now over 100 years old; this well preserved building representing a past era, was in its heyday the centre of Parata Village – the original Waikanae commercial development. Over the past two years the Museum's image has benefited from an increased patronage, particularly from school groups. To allow these larger parties to be accommodated a lot of the former display materials has had to be stored in a particularly inaccessible ceiling space over the main building. The access to this is via a ladder through a ceiling hatch. We consider that the work of Ontrack improving the rail system, to some degree gives the Museum a greater presence and a more public image.

But this could be enhanced by making the remnants of the original village into a special conservation and cultural area, a precinct representing the historic nature of Parata Village. This could include St Lules Anglican Church, the Senior Citizens Hall, the Memorial Hall, the park and Museum and with some form of conservation or preservation order on the remaining village buildings - the Malenga Auto Services garage, the East Side Food Market and Relish cafe.

Hindering a further accessibility to this historic and cultural area is the woeful lack of pedestrian linkages to the main shopping area.

We consider then that the District Plan should address these concerns by:

1. Creating criteria which would guide and encourage development of a "Historic and Cultural Parata Village Area"
2. Allow for ancillary character buildings to be located adjacent to the Museum for storage, display and teaching purposes.
3. Provide safe readily available foot access across SH1 with particular regard to children, the elderly and infirm.

1. I believe you have summarised the issues accurately.
2. I think they are on the right track. I believe that partnership with private landowners with ecological restoration is of vital importance. The Waikanae river flood plain should be considered as a special zone.
Ref No | Name/Organisation | SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS
--- | --- | ---
140054 | The New Zealand Anglican Church Pension Board | BIODIVERSITY
Thank you for providing The New Zealand Anglican Church Pension Board (hereafter the Board) with the opportunity to provide feedback on the various discussion documents which have been released for public consultation. The Board owns an investment property at the eastern end of Hadfield Road, off State Highway 1 near Peka Peka.

In general, the Board is concerned that the discussion documents take a protection oriented view of how sustainable management should be applied to the Kapiti Coast.

The Board considers that the documents fail to consider the practical implications of the suggested directions and fails to recognise the benefits and value that economic activity and development generate for the Kapiti Coast and its communities.

An example of the protection-oriented approach taken in the documents is the statement that environmental offsetting is ‘dubious’ and a ‘risk to biodiversity’. This view appears at odds with good practice developing elsewhere in the country (that builds on international experience), which is seeking to use environmental ‘offsets’ as a mechanism to enable development to occur while achieving no net loss in biodiversity.

The Board is of the view that many of the directions signalled in the discussion documents have the potential to increase Council activity e.g. surveying, reviewing and analysing, or to generate significant direct cost for landowners. One example of this latter is the commentary on page 7 of the Biodiversity discussion document which suggests that in relation to bush remnants landowners should exclude stock, fence the areas and maintain pest and weed control plans. If such requirements are imposed on landowners without some form of incentive or compensation these will be very costly.

The Board strongly encourages the Council to pursue the incentive based mechanisms listed on page 13 as a priority over regulation and restrictive District Plan rules.

Likewise, in relation to the management of landscape values, the Board encourages the Council to pursue flexible approaches, such as design guidelines, which we think could be helpful, rather than rigid rules which overly emphasise protection.

The Board considers that the Biodiversity discussion document presents an unduly negative view of plantation forestry which the discussion document refers to as “threatening biodiversity”. It makes no mention of the potential benefits of plantation forestry, not only in terms of economic development, but also greenhouse gas sequestration and other environmental benefits. The document mentions that native vegetation can develop under plantation forests. But rather than seeing this as a positive outcome, the document focuses solely on the negative impacts that can occur at harvesting. Council should recognise that in many cases the biodiversity values identified in the discussion documents only exist because of production forestry. In our case the land was mostly grassy pasture land and slip prone before being planted in pines. Native bush is now regenerating rapidly in areas already harvested. The temporary flattening of native bush during harvesting is just that, temporary. It is not destroyed by harvesting and recovers rapidly.

Conditions and restrictions should be considered at the time of afforestation, not years and investment dollars later at the time of harvesting. The Board therefore encourages Council not to impose regulatory barriers which may act as a disincentive to the activity that allows the biodiversity values to (re)establish.

Another good example of biodiversity in pine forests is in a 10 year survey of New Zealand birds “The Bird Distribution Atlas Of New Zealand” produced in 2007 which shows multiple species of birds were even more prominent in pine forests than in native.

The Board again thanks the Council for providing this early opportunity to provide feedback, and encourages the Council to release a non-statutory draft of the new District Plan so that parties can comment on the detail of the provision in an informal setting.

The Board would welcome the opportunity to meet Council staff to discuss its concerns about the discussion documents and its ideas about how the sustainable use of its property can be ensured in the long term.

140056 | Anonymous | BIODIVERSITY
Biodiversity improvement on private land will be hampered if there is obvious or potential cost or economic loss to the landowner. By this I mean that it is likely that landowners will resist improving biodiversity if they perceive that they are going to have to pay unreasonably for it. Examples might be: reduced capital value, increased compliance cost (e.g. having to pay for a permit for regular work), increased land management cost (e.g. pest, weed control).

Make sure that the objectives of council and landowners are as well aligned as possible to make it happen more quickly.

140057 | Ian Jensen | BIODIVERSITY
I submitted extensively on the pertinent discussion papers that pre ran the existing District Plan, I consider that despite some short comings, the current District Plan is a quantum leap forward from the previous planning regime, has resulted in some very positive effects.

I have lived on my Rural Lifestyle Block for nearly 22 years, have more than 50 years experience of the land and adjoining properties that lay more than 1 km to the south and more than 0.3km to the north from SH1 to the beach.

I have more than 1ha of wetlands on my property and as such I am well conversant with the enormous effort and financial input that is required to even maintain them at status quo.

I have evidence that in the wider sphere the wetlands on our land are now of a greater area, have increased biodiversity values and attributes from those of which were current when we purchased the land.

These have resulted directly from our efforts and financial input, considering the efforts here that were self motivated by our decision to purchase the land more than 23 years ago.

We have extensive plans for an increase in the biodiversity when the necessary approvals are gained with the potential, documented more than 5 years ago of other additional areas for consideration.

I am appreciative that Council have obligations under the RMA to carry out such reviews, I find however that within the discussion document, while there are considerable positive considerations, there are also contradictions and suggested actions if not carefully considered may have potentially negative aspects and outcomes.

Locally development generally has been the saving grace of the local biodiversity, with out it very significant areas potentially could still be with out protective covenants, despite the claims of some, significant major wetland areas were placed under covenant at time of subdivision.
The resultant subdivisions have then allowed owners to proactively enhance individual properties and in some cases place additional covenants, this proves that Subdivision and development can have very positive effects.

"The District Plan sets a regulatory framework, guiding what can and cannot be done". While this is true in its own right, it is also met in part with the Rural Subdivisions Design Guide where acceptance of that guide is needed by both Council officers and the community, there is significant input still required to provide additional guiding frame works to facilitate additional issues around biodiversity, provide information as too how issues can be dealt with and done, work with landowners to meet the landowners aspirations so that the result is one that the landowners can embrace for the future as this is pivotal for the ongoing care and maintenance, if land owners are not able to embrace the result there is the potential for a very negative outcome that not only has negative results on that land but can over flow to adjacent land as well.

4) “Additional objective to identify areas suitable for restoration”

Looking collectively, all of the District is or has areas suitable for restoration, even areas where Council have approved the works of extensive community assets, so then should private areas be subject to a more stringent regime which appears in this discussion document.

5) (3 Issues, Challenges and Trends page 5) "We rely on ecosystems, not only for our health and well-being, but for our existence, - ecosystems being sustainable and resilient are integral to maintaining a sustainable community - food and raw products that feed into commerce - the food, products and services, can be categorised as ecosystems - Ecosystems services are the benefits people obtain, e.g. fresh water and productive soils.”

Contradiction. "Threat ecosystem destruction from farmland" (productive soils) "Much degradation to increase supply of mostly provisioning services, food and products", (the food, products and services).

6) (page 7)

Photo, "Development creeping towards a valued wetland".

In this case there is no further threat of the development shown closing in on the wetland, due to major infrastructure and the wetland drainage system that separates them. The opposite margin is supporting proposals for eco hamlet type development with appropriate margins and buffers.

7) (4 National and regional Context page 9) "Ongoing loss of biodiversity from private lands ".

Equally there are losses occurring from public lands.

8) (5 District Plan Considerations, page 10) "District Plan Rules" - recommendation - "combined with competent enforcement"

This should be combined with competent assistance, then it is likely the need for competent enforcement will be mitigated or reduced to an acceptable level, there will be the potential for landowners to take a more positive role, the environment will benefit earlier and the cost to the community will be reduced.

9) (page 11)

"Andrews pond - was the best manuka sphagnum bog in the District - raised water levels killed the manuka and sphagnum"

Is it not possible that the manuka and sphagnum were a product of lowered water levels occurring in the first instance over a considerable period of time, now to some degree water levels have been restored in this once predominant lowland/wetland forest coastal strip, so are we now seeing a return environment in terms of water levels closer to that of several hundred years ago.

10) (page 13)

Make the completed assessments of the Landscape ecologist readily available so that during this process they can be discussed and integrated in the District Plan update. "Greater incentives for management to enhance biodiversity - fencing - covalenting - planting - pest & weed control" While the above are noted this needs to be extended to water table levels, how they can be maintained as a minimum or increased to predominate levels that will allow an increase in the biodiversity, without which the decline in biodiversity particularly in wetlands will continue. There are recent expert reports that bear this testament.

11 Ecological sites should be fenced to exclude stock - pest animals and weeds should be controlled to a minimum standard - vegetated buffers

Additional buffers in some areas will exaggerate the management issues in the future, management needs to be balanced to that which is actively achievable. There is little point to have additional buffers that then place the original ecological site in jeopardy which has occurred locally.

12) (page 15)

"Placement and width of buffers - District Plan should provide support to maintain them"

With a dwindling purse this is a huge test on the community to provide here.

13) "Clustering of rural dwellings - plan change 79 - this covers a specific area – could be expanded to all rural areas"

This is further evidence of the positive effects of subdivision and development, where the health and well being of both the community and the environment can be integrated with a positive outcome.
### Submission Content on All or Specific Discussion Documents

- Relief from buildings and all the urban clutter associated with populated areas. Very desirable, as natural vegetation, birds and water are all desirable and a pleasure to have about us.
- My point here is to highlight the fact that despite these good objectives Council has repeatedly refused to take advantage of an opportunity to purchase Tower Lake, to preserve it as a community asset and maintain and make improvements, over time.
- The Lake is a unique feature being close to the heart of Paraparaumu, with a high public exposure and access, opposite the developing new Airport with the expected increasing number of viewers.
- To repeat, plans are one thing, action is another. Without action, all the planning is a waste of time and pointless grandstanding.

### Natural Hazards and Managed Retreat

- Dr Judith Aitken (late)

I am a councillor on the Greater Wellington Regional Council (Wellington ward) and note that that Council has made a submission that covers all the recently published KCDC discussion documents.

I agree with and support the overall content of GWRC's submission on Natural Hazards and Managed Retreat, and the issues raised in respect to such matters as residual risk.

However, there are some additional matters I would like to raise from a longtime resident's perspective, with an active interest in erosion and coastal hazard management. My own house is one developed section back from the dunes in front of Stonewall Grove, and two family members are resident in Rauparaha Street and Campion Street.

I look forward to participating in and actively encouraging ongoing liaison between our two Councils on the important issues raised in your discussion documents, and congratulate you on their overall quality and timeliness.

I agree with the statement made in respect to your intent to work towards a managed transition to improved resilience in the face of climate change, while at the same time preparing for the worst possible impacts.

Notwithstanding that in the community there remains some residual flat earth denial of the increasing risks of adverse effects from climate change, I regard your approach as prudent and appropriate, given your duties and responsibilities for protecting and promoting the wellbeing of the people of Kapiti Coast.

#### p.6 re sea level rise

- In my view, the community’s anxiety levels in respect to the increasing rate of sea level rise are far too low.
- I suggest that during the period of community engagement indicated elsewhere in the document, you ensure that facts about this Kapiti Coast risk are effectively publicised.

#### p.7 re definition and discussion of “managed retreat”

- The final point on this page is somewhat disingenuous in commenting that “the option of retreat will...need to be considered as existing coastal protection structures reach the end of their lifetimes” although on p 8 you do strengthen this somewhat by signalling that new hazard zones and additional controls over development may be necessitated, and by commenting (rightly, in my view) that “many people underestimate the damage or danger created by floods”.
- You rightly reinforce this point on p12 in the section entitled “perception of risk”. The question then becomes how best to sharpen up popular understanding about and preparedness for these risks.

#### p.8 Decision making criteria/principles

- The four principles/criteria set out on this page provide a useful basis for decision making.
- However, I would like to see the KCDC taking some more specific action in relation to the first principle “providing certainty” where you state that all parties engaged in the sale or purchase of properties at risk should do so “in full knowledge of the risk and rules”.
- For instance, I understand that at present LIM reports to do NOT explicitly define or limit the KCDC’s actual or potential liability for rectifying, paying for, or otherwise remedying or relieving property owners whose properties are, maybe or suffer adversely from significant hazards/risks.

#### p.11 Useful diagram showing the differences between regional and district plans

- Is it your view that this is an appropriate and sustainable balance of responsibility and rule definition?
- Is it within the future capacity of KCDC to manage and enforce the rules summarised in this diagram?

#### p.14 re Environment Canterbury’s approach to overriding existing use rights for existing dwellings

- Clearly this is likely to be the one of the more politically divisive and contentious matters KCDC should consider in future.
- I strongly urge you to actively consider and promote this step, adapted as appropriate for the Kapiti Coast while retaining the essential provision for overriding existing users’ rights.

#### p.15 re the support required by the KCDC in respect to Regional Plans requiring the removal of existing buildings

- I suggest that this be addressed as a matter or urgency so that all necessary forward financial, legal and other planning is well in hand.
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<th>Ref No</th>
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<th>SUBMISSION CONTENT ON ALL OR SPECIFIC DISCUSSION DOCUMENTS</th>
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<tr>
<td>140063</td>
<td>Paraparaumu/Raumati Community Board (date)</td>
<td>I look forward to this high priority matter being one of active discussion between the two councils over the coming triennium. The new GWRC committee arrangements should facilitate proactive crosssectoral engagement on such issues as what constitutes an appropriate and effective &quot;trigger&quot; for relocation, what should be the requirements to provide access for relocation, and the availability of alternative building sites. I endorse the repeated statements made to this effect eg in the second to last paragraph on p. 15. p.16 Diagram of concepts etc I was uncertain about the utility of the presentation of the diagram on p 16, and had to seek advice from a KCDC planner on what the numbers 1-5 represented (for example, they could be regarded as years or priority rankings).</td>
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**GENERAL COMMENTS**

At our meeting on Tuesday the 23rd of November, the Paraparaumu / Raumati Community Board discussed the approach that they would like to submit into the District Plan major Review. Our Community Board wishes to engage with elected Councillors/ Mayor, senior officials on a different level than perhaps may have occurred in the past. We request that Council staff establish a workshop / series of workshops to engage constructively with all the Community Boards at the same time. The purpose of the workshop would be for all 3 parties to establish the high level strategic planning assumptions that need to be determined and agreed prior to any creation of a new District Plan. When you read the current documents, it is clear that all the planning assumptions that lead to their creation are either outdated or need to be significantly tested for ongoing relevance. As an example, some of the major external opportunities that now need to be analysed in great detail for the District Plan, are the Expressway, the Airport and the new rail corridor to name just a few.

It is imagined that if the workshops can establish the correct planning assumptions then a new high level Vision for Kapiti for the next 10 to 20 years may also be able to be better determined. That Vision and those assumptions would then enable all parties to identify what type of environment do we want Kapiti to become in the future. Once this level of activity has advanced, our Board would then strongly recommend to Council that a similar process is undertaken with key sectors in the community across Kapiti, e.g. IW1, Educationalists, industry sectors, Chamber of Commerce, Nature Coast, Developers, NZTA, Kiwi Rail, Sir Noel Robinson, Resident Groups etc. That would then give the community the chance to critique what Council has determined, identify gaps in our thinking and would start a longer term buy into the future Vision. Once the Vision and assumptions are clearly understood across the community, then the Board considers great progress would be made on the new District Plan as wherever possible the community has been engaged and hopefully would have bought into the process going forward.

This Strategic approach to the District Plan does not preclude individual detailed submissions on specific topics being produced, and our Board is pleased to also submit as an attachment to our submission a detailed submission from Councillor Gurunathan on an opportunity to enhance Food production through the market environments within Kapiti.

**GLOBAL CHANGE: ISSUES AND PRESSURES**

The Paraparaumu Raumati Community Board supports the statement in the discussion document 'Global Change: Issues and Pressures' on page 15 which states:

"The District Plan should allow for farmers markets and street fairs to be easily established to maximize opportunities for a local food economy. These also encourage social interaction to build social capital and resilience as well. The District Plan should also enable food to be grown in urban areas including on public land as community gardens."

**FOOD AND RURAL PRODUCTIVITY**

The Board supports the further reference in the discussion document 'Food & Rural Productivity' which concludes on page 18 by advocating new concepts including "Incentives for farmers' markets" and highlighting the need to remove "unnecessary barriers to farmers markets". The Board also supports the statement on page 11 which says: "From an economic development perspective, the additional value that services such food processing can bring to food production in the District is worth considering. If Kapiti is not only able to produce raw food but also able to turn it into chutneys, meatballs, vege chips and other things that households like to eat, this would increase the number and variety of jobs available locally, while at the same time providing greater resilience in the event that processed foods become more difficult to get from elsewhere in the world".

The Board would like to make these observations:

- Firstly, District Plan changes should not only be made to encourage and promote farmers markets but as stated earlier in the global change discussion document also include "street fairs".
- Secondly, the Board makes specific reference to the successful Paraparaumu Beach Saturday Market where there are a range of wares being sold including fresh produce and locally prepared foods. This market is not only a privately managed business but a proven producer of social capital.
- Thirdly, feedback from the market stallholders and the managers indicate that one of the barriers to the market's increased economic and social viability are the unduly heavyhanded regulations on the food sector and the enforcement of the associated bylaws.
- While the Board views food hygiene and the provision of safe foods as a legitimate health and safety issue there is a need for a common sense approach to its enforcement.

The Board believes that the sustainability of local food production should be better linked through the District Plan to the advantages of encouraging local food processing and the sale of such food through local outlets including farmers and street markets. Such markets are known to be avenues for innovation and the testing of products for mass markets. The market has over recent years started to reflect demographic changes with an increase in the diversity of cultures and the resulting experiment in exotic foods being sold. This must be encouraged.

The Community Plan has outlined 16 leadership areas which includes "Exploring the Local Food Economy". The Board believes Council should develop a policy on the promotion of farmers and street markets rather than, as its happening now, where other council regulations and requirements are used to 'control' them. This new policy on farmers' and street markets should be developed as part of council's successful policy on developing and invigorating town centres.