

To Kāpiti Coast District Council

Further Submission in Opposition to a Submission on Proposed Plan Change to the Operative Kapiti Coast District Plan 2021

Plan Change Number: PC2

Plan Change Name: Proposed Plan Change 2

Full name of person making further submission: William Glen Turner Wiggs

Postal address: [REDACTED]

Telephone: 04 905 8238

Email: glen@wiggsy.com

I would like my address for service to be my email. Yes

I have selected email as my address for service, and I would also like my postal address withheld from being publicly available: Yes

I would like my address for service to be my email.

I have selected email as my address for service, and I would also like my postal address withheld from being publicly available.

I am a person who has an interest in the proposal that is greater than the interest the general public has as I am a resident at Waikanae Beach and will be directly affected by the intended planning change.

Scope of further submission: I oppose the submission of: Kainga Ora

Email: developmentplanning@kaingaora.govt.nz

Submission number of original submission: S122

I seek that part of the original submission be disallowed - The recommendation in S122.112 as it pertains to Waikanae Beach.

Submission

I oppose the recommendation in S122.112 to amend the Local Centre building height to enable building heights of up to 18 metres (5 storeys) in Waikanae Beach in the area marked 'Height Variation Control' on the Waikanae Beach map contained in Appendix 4 of the submission (the area). In the Decision Requested column this request has been interpreted as 45 storeys which I presume is a typo error.

Natural Hazards

1. The recommendation does not take into account inundation caused by natural hazards to which the vast majority of the area is subjected to. Many of the properties in the area have been subject to inundation from rainfall from December 2021 to September 2022. This is not surprising as most of the area prior to 1920 was either a lake, river or swamp. The river

was diverted in 1920 and the lake drained in 1921 by W H Field to enable the area to be subdivided and sections sold in 1923 and 1925.

The present-day consequence is that the former swamp, river, stream, lakes and low-lying areas are prone to flooding. Fig 1 is a photograph of our neighbour's property taken in August 2022. The water covers all their front lawn and driveway. This has been a common occurrence since the rains in December 2021 with flooding most of the time.

Fig 1– Flooding at 40 Ngapaki St August 2022



Coastal Hazards

2. The recommendation also does not take into account coastal hazards and in particular Policy 25(b) of the New Zealand Coastal Policy Statement 2010 (NZCPS) which reads -

' In areas potentially affected by coastal hazards over the next 100 years:

...

(b) avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards'

The KCDC website has a Coastal Inundation Mapping Tool which is used to measure the impact of inundation depending on the level of sea level rise. I have utilised the tool to estimate the inundation of roads and properties in the area.

At the lowest inundation level of 0.4 RSLR the following streets and/or adjacent properties would be inundated:

- Road at bottom of Te Moana Rd
- Properties at cnr Taiata St and Tutere St
- Waimea Rd and properties
- Lavinia Grove properties

At the inundation level of 0.65m RSLR the following streets and properties would be inundated:

- All the above plus
- Ngapaki St properties between Hemara and Rauparaha Sts
- Street and properties at the bottom of Rauparaha St
- Street and properties at Tutere St between Raupahara and Rangihiroa Sts
- Street and properties at eastern end of Hemara St
- Street and properties in Hohira St
- One or two properties in Henare St
- Street and more properties in Waimea Rd

At the inundation level of 0.85m RSLR the following streets and properties would be inundated:

- All the above plus
- Te Moana Rd and properties near junction blocking access and most of lower Te Moana Rd and properties
- All East West roads except Taiata St making access impossible plus properties
- Most of Tutere St and properties
- Both ends of Ngapaki St and properties

At the inundation level of 1.25m RSLR

- All the above plus
- The junction at Te Moana Rd and Raupahara Sts, and properties, would be inundated making access to the area impossible
- All streets and 80 % of houses would be inundated except Kawau Grove, Flaxmere St, Huiawa St and Taiata St. Taiata St properties on the south side would be inundated

At the inundation level of 1.65m RSLR

All streets and 90% of properties would be inundated except Flaxmere St and Kawau Grove, but ingress and egress would be impossible.

The estimated rate of inundation on properties in the area is as follows -

0.4m RSLR	5%
0.65m RSLR	10%

0.85m RSLR	20%
1.25m RSLR	80%
1.65m RSLR	90%

The area would be adversely affected at low levels of inundation and severely affected at higher levels. At 1.25m RSLR most roads and all key junctions would be inundated making ingress and egress impossible. Additionally, an estimated 80% of properties would be inundated. It would be a major disaster. Even inundation at the 0.85m level would make the area uninhabitable.

Policy 25 (a) of the NZCPS is directly applicable –

‘Policy 25 Subdivision, use, and development in areas of coastal hazard risk

In areas potentially affected by coastal hazards over at least the next 100 years:

(a) avoid increasing the risk of social, environmental and economic harm from coastal hazards;’

The proposal to allow buildings 18 metres high would increase the risk of social, environmental and economic harm both to housing and roading caused by inundation.

Recent Government Report

3. On 11 October 2022 the Associate Minister of Local Government Hon Kieran McAnulty released a report entitled *‘Vulnerable Communities Exposed to Flood Hazard’* (*‘Vulnerable Communities Exposed to Flood Hazard’* (<https://www.dia.govt.nz/diawebsite.nsf/Files/Proactive-releases/%24file/Vulnerable-Communities-Exposed-to-Flooding-Report-2022.pdf>). It lists 44 communities that are exposed to the natural hazard of flooding which include *‘Kapiti Coast (Waikanae to Paekakariki)’* and *‘Otaki/Otaki Beach’*. This should be taken into account in the District Plan. To allow 18 metre buildings in an area recognised by a government agency as being exposed to flooding would be reckless.

Discussion

4. The submission by Kainga Ora to recommend 18 metre high buildings appears to be based on a study undertaken at a desk in Wellington or Auckland. Basic research would have revealed that there are flooding problems currently in the area caused by natural hazards and the Jacobs Report makes it clear that the area is threatened by inundation from coastal hazards. None of the problems have been considered. Indeed, a scan of the submission reveals that the word ‘inundation’ is not mentioned anywhere. The words ‘flood’ and/or ‘flooding’ appear seven times but in support of the contention that flooding should be excluded from the District Plan and should be covered by a non-statutory document (ID 54 of their submission). Inundation/flooding is a serious problem and ignoring a problem, particularly a serious problem, does not solve it.

I request that the recommendation in S122.112 as it pertains to Waikanae Beach in the submission by Kainga Ora be dismissed.

Additionally, I have read the submission by John Tocker and fully support it.

W G T Wiggs

From: [Glen Wiggs](#)
To: [Mailbox - District Planning](#)
Subject: PC2 - Further Submission
Date: Thursday, 24 November 2022 12:51:15 pm
Attachments: [Submission Wiggs pdf.pdf](#)

I attach my further submission opposing the submission of Kainga Ora in part.

Would please acknowledge receipt

Regards

W G T Wiggs