

**TO: Kapiti Coast District Council:**

**SUBMISSION ON PROPOSED PLAN CHANGE 2 TO THE OPERATIVE KAPITI COAST DISTRICT PLAN 2021.**

Full Name of Submitter: Gordon Shroff

Contact Person (name and designation if applicable):

Postal Address (or alternative method of service under section 352 of the RMA:

[REDACTED]

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027 4758003

Electronic address for service of submitter (ie email):

Gordon.shroff@icloud.com

I would like my address for service to be my email **YES/** (delete one)

I have selected email as my address for service, and I would also like my postal address withheld from being publicly available **YES/** (delete one)

For office use only
Submission No:
17


**SCOPE OF SUBMISSION**

**My submission relates to:**

- 1 The need for an enlarged Coastal Qualifying Matter Precinct.
- 2 The need for Beach Residential Qualifying Matter Precincts.

**My submission is that:**

1.The landward (eastern) boundary of the Coastal Qualifying Matter Precincts for the District (marked PRECx3) should be amended to be the landward boundary of the area shown as the Adaptation Zones, which the Kapiti Coast District Council recently determined and published on its Takakutai Kapiti Coastal Hazard Susceptibility Assessment maps.

(<https://maps.kapiticoast.govt.nz/portal/apps/storymaps/stories/dbc000c7263f4d63b8978047ed0e826b>)

2. Further or alternatively that the existing Beach Residential Precincts become Beach Residential Qualifying Matter Precincts under PC2 and that accordingly:
  - a. Residential Intensification Precinct B PRECx2 be removed from all Beach Residential Qualifying Matter Precincts; and
  - b. All existing Beach Residential Precinct plan provisions continue to apply to the Beach Residential Qualifying Matter Precincts.

3.Such further or other consequential relief as is required to give effect to the submissions above.

## The Reasons for My submissions

In essence my submission is that the KDC is being overly zealous if not reckless in seeking to apply the MDRS provisions to low lying coastal areas in Kapiti. The Council has failed to adopt a coherent precautionary approach towards all known and scientifically documented hazards, particularly inundation arising from interlinked Sea Level rise, geomorphic subsidence and groundwater rise. The Draft PC2 draws a spurious and impausible distinction between the impacts of coastal erosion and inundation from a variety of causes and proposes to address the latter by invalid use of Building Act provisions.

My submission seeks to remedy these serious flaws in the PC2 proposals, drawing on the following points:

Part 2 of the RMA, in particular sections 5, 6(a) and (h), 7(c) and(i) supports the submissions made above.

The submissions are consistent with Council's ability to exclude areas to which the MDRS provisions apply under Section 77G of the RMA.

The submissions are consistent with Section 77L of the RMA.

The submissions are consistent with the New Zealand Coastal Policy Statement, in particular Policy 25 (a),(b),(c) and (d) and current District Plan Coastal Environment area as noted in the District Plan maps, whereas the application of MDRS zoning in the area subject to coastal hazards, including increases in the risk of inundation due to climate change, is contrary to Policy 25 (a),(b),(c) and (d).

The submissions are consistent with the National Adaptation Plan process.

The submissions are consistent with the National Policy Statement for Freshwater Management particularly in relation to wetland, flood and stormwater management. The submissions are consistent with other non-statutory documents produced in consultation with the community by the Council and previous decisions of the Council and the following research papers

Inadequacy Revealed and the Transition to Adaptation as Risk Management in New Zealand, Judy Lawrence, Sylvia Allan and Larissa Clarke; POLICY AND PRACTICE REVIEWS published: 19 November 2021, doi: 10.3389/fclim.2021.734726

Judy Lawrence, Sylvia Allan, Larissa Clarke (2021). Using current legislative settings for managing the transition to a dynamic adaptive planning regime in New Zealand. Wellington: Resilience to Nature's Challenges National Science Challenge - Enabling Coastal Adaptation Programme

## HEARING SUBMISSIONS

I/We wish to be heard in support of our submission **NO**

If others make a similar submission I will consider presenting a joint case with them **YES/** (delete one)

Signature of Submitter **Gordon Shroff**

Dated:**11 Sept 2022**

**Note A signature is not required if you make your submission by electronic means.**

Trade Competition [select the appropriate wording]

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could / I could not gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission, please complete the following:

I am / I am not directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

**From:** [gordon shroff](#)  
**To:** [Mailbox - District Planning](#)  
**Subject:** Submission on Proposed Plan Change 2 to the Operative KCDC Plan 2021  
**Date:** Sunday, 11 September 2022 3:23:41 pm  
**Attachments:** [PC2 Submission V2.PD.docx](#)

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Attached is my submission on the above topic. Email confirmation of receipt would be appreciated.