

## Resource Consent Application RM210149

**Applicant: Kapiti Coast District Council**

**Proposal: Land use consent application to enable the construction and operation of new buildings and associated car parking. The activities within the building are primarily to facilitate visitors to Kapiti Island, with some retail use sought. Earthworks are required to facilitate structures.**

**Legal Description(s): SEC 2 SO 322370**

**Supplementary submission by Dr Frederick John Davey, 3 Golf Road, Paraparaumu Beach, 021595564, in Response to Memorandum of Counsel on behalf of Applicant dated 20 October 2022.**

### Introduction

I am responding to the Memorandum of Counsel (BuddleFindlay) on behalf of Applicant dated 20 October 2022, resulting from the Hearing on the Kapiti Gateway resource consent before the Panel of Independent Commissioners on 3 and 4 October 2022.

**Protection of Existing Trees.** My supplementary comments refer to the Panel's requests for additional information on the trees to be retained in the vicinity of the Gateway buildings and site. I noted that several large trees along the northern and eastern margin of the site have already been removed ad-hoc by Council staff.



Image 1 shows the Council arborist hacking down a significant part of a mature pohutukawa on the southern bank of the Tikotu stream to allow a larger digger to access the stream as a result of “engineering problems” with the non-notifiable project to replace and modify the stream banks and containing walls. This decision appears to have been made ad-hoc by the project manager at the time i.e. little or no consultation (I

watched it being made). If the Resource Consent was approved and “engineering problems” occurred with the Gateway building and peripherals, then the whole tree could be eliminated.

A true story - About 50 years ago I worked at offices on the Terrace in Wellington. We had a tree in the pavement outside the office. It provided shade and greenery in the summer. However, the council wanted to remove it. We were against this plan. However, one day the Council wanted to bury some new cables under the pavement and a trench was dug that passed directly alongside the tree. We protested but were told there is no problem as the tree still had over 50% of its original roots. About 2 or 3 months later, the Council wanted to bury some more cables under the pavement and dug a trench that ran immediately alongside the other side of the tree. We protested but over night a breeze blew up and the tree gave up the ghost and fell over.

2. The second image is from the KCDC webpage on the Gateway. It shows their vision for the future – few trees and bush on the beach side of the Gateway buildings with sand reaching directly up to the decking. This will form a third channel for frequent westerly strong winds to blow sand from the beach up and onto the road. This happens at present through the beach access track/road and will likely through the widened and cleared stream channel and banks.



Frederick Davey 8/11/2022