Submission in relation to application RM 210149

(Kapiti Gateway Project and associated new carpark areas)

By   Clare Holden, Michael Wilson and Mikclare Investments Limited.

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We are not trade competitors for the purposes of section 308B of the Resource Management Act 1991.

We oppose the application in full.

We seek that the application be declined.

We wish to be heard at the hearing and will be represented by Counsel.

We may call expert witnesses in the areas of planning and/or landscape values.

We are aware of the requirement to send a copy of our submission to the Applicant.

The reasons for our submission are as follows:

The overall proposal

a) The overall proposal does not comply with section 104D of the Resource Management Act because the combined adverse effects of the proposal will be more than minor and the overall proposal is contrary to the objectives and policies of the District Plan.

b) The overall proposal is contrary to section 6(a) of the Resource Management Act and contrary to the New Zealand Coastal Policy Statement and the objectives and policies of the Wellington Regional Coastal Plan and the Kapiti District Plan.

c) The proposal fails to preserve the natural character of the coastal environment and would be an inappropriate use and development of the coastal environment.

d) The gateway structure does not need to be located in the reserve and could instead have been located over the road in an appropriate environment.

e) The Application material contains material inaccuracies.

f) The Application should have been publicly notified since the adverse effects on the environment would clearly be more than minor.

g) The Council has failed to properly consult with the community and tangata whenua.

We oppose the carparking part of the proposal for the following reasons:

h) The proposed removal of most of the width of a large section of the grassed foredune reserve, to create a car park is contrary to section 6(a) of the Resource Management Act and contrary to the New Zealand Coastal Policy Statement and the objectives and policies of the Wellington Regional Coastal Plan and the Kapiti District Plan.
i) The proposed destruction of the foredune is an inappropriate (and unnecessary) use and development of the coastal environment and fails to preserve the natural character of the coastal environment.
j) This part of the proposal fails to preserve the natural character of the foredune reserve area.
k) The proposal will detract from the current high landscape values of the fore dune.
l) We are directly impacted by the proposed work because our outlook over the beach and sea will no longer be over a grassed dune but will instead be over a car park and rock wall. This is a significant reduction to the natural character of the coastal environment which we currently enjoy.
m) The proposed earthworks will significantly reduce the level of protection provided by the foredune from storm surges.
n) These earthworks are proposed in an area which the District Council's coastal hazard consultants have provisionally identified as an area which is likely to be subject to erosion and inundation.
o) Within the context of climate change and sea level rise, the proposal will increase the risk of inundation to properties (including ours) on the east side of Marine Parade during storm surges. (Unlike residential areas along Manly Street, Marine Parade is not protected by an extensive area of dunes, nor is there a sea wall of any type).
p) The proposal will increase the level of erosion and inundation risk to Marine Parade Road.
q) The proposed car park is in an identified flooding area and the increased asphalt area will increase the level of flooding to the road during storm surges and high intensity rainfall when the stormwater capacity is exceeded.
r) The proposed car park and associated earthworks fail to maintain and enhance the amenity values of the area.
s) The nearby car parks are heavily used by campervans and this car park will be the same. This increase in overnight use will detract from amenity values.

We oppose the gateway building proposal for the following reasons:

a) The proposed removal of a grassed reserve area to be occupied by large building is contrary to section 6(a) of the Resource Management Act and contrary to the New Zealand Coastal Policy Statement and the objectives and policies of the Wellington Regional Coastal Plan and the Kapiti District Plan.
b) The proposed building is an inappropriate (and unnecessary) use and development of the coastal environment and fails to preserve the natural character of the coastal environment.
c) This part of the proposal will detract from the natural character of the foredune reserve area.

d) The proposal will significantly detract from the current high landscape values of this residual foredune and reserve.

e) The proposal fails to maintain or enhance the amenity values of this part of the reserve.

f) The Council has failed to adequately consider appropriate alternatives including the use of the existing boating club or the use of land which was owned by the Council on the eastern side of the road.

g) The Council has not demonstrated any economic or community necessity for this project.

h) The proposed building would be located in an area of the coastal environment which the Council has provisionally identified as being at risk of coastal erosion and inundation within the context of projected sea level rise. The Council is intending to restrict development in such areas by way of amendments to the District Plan, yet is seeking to allow a high value development on this site for its own purposes. While the proposed building may be relocatable, the reality is that the Council will in the future come under pressure to protect the building and the site. If approved, this development will create an unfortunate precedent.

Michael Wilson … ……………………………………………28 June 2022

Clare Holden ……………………………………………… 28 June 2022

As occupiers and for an on behalf of Mikclare Investments Limited as owner