

18 December 2024

Darren Edwards
Chief Executive
Kāpiti Coast District Council

By email: Darren.Edwards@kapiticoast.govt.nz

Tēnā koe Darren

Thank you for your letter dated 30 October 2024 providing an update on Council's coastal adaptation project (the Taukai Kāpiti Project). Apologies for the delay in getting back to you.

In your letter, you sought feedback on several matters in the Coastal Advisory Panel's findings relating to the New Zealand Coastal Policy Statement (NZCPS). I appreciate that you are grappling with some tricky coastal hazards issues in your district.

Specifically, you asked for feedback on your obligations under the NZCPS to "take a 100-year perspective" on coastal hazards planning.

Policy 24 of the NZCPS requires councils to assess coastal hazard risks, over at least 100 years. It gives guidance as to what needs to be considered in assessing these risks, including taking into account national guidance (which the Department of Conservation (DOC) and the Ministry for the Environment have issued) and the best available information on likely effects of climate change.

Policy 25 sets out the policy response in areas potentially affected by coastal hazards over at least the next 100 years. Plans must give effect to the NZCPS, which does not enable any Council to modify the 100-year timeframe when identifying hazard risk and responding to this policy directive.

How the council designs plan provisions and identifies hazard risk (over that 100-year period) within the District Plan is a statutory planning matter for the council to determine based on your specific circumstances, within the NZCPS and RMA context.

We cannot advise on specific questions about your suggested coastal hazard zoning modelled on relative sea level rise (RSLR), or staging an approach to reflect a future Kāpiti Coastal Adaptation Plan. However, we can say that the "100-year perspective" applies to those processes.

You suggest the "100-year perspective" creates uncertainty and inconsistencies. The purpose of the 100-year timeframe is to acknowledge and explore this uncertainty, and is consistent with timeframes used by the Intergovernmental Panel on Climate Change (IPCC) and the precautionary approach (Policy 3 of the NZCPS).

You may be aware that as part of its RMA Reform package, the Government is reviewing natural hazard policy and will be issuing new national direction on natural hazards. The new natural hazards NPS will provide direction to councils on how to identify natural hazards, assess the risk they pose, and respond to that risk through planning controls. You are likely to hear more about this work from the Minister responsible for RMA reform and the Ministry for the Environment (MfE) in 2025.

My staff have discussed the issues you have raised with staff at MfE who support this response.

If you wish to discuss these matters further, please contact Karen Bell (Senior Policy Advisor RMA) at kbell@doc.govt.nz.

Nāku noa, nā

A handwritten signature in blue ink that reads "pnelson".

Penny Nelson
Director-General of Conservation
Department of Conservation | Te Papa Atawhai