

# Further submission in support of, or in opposition to, submission on notified proposed plan change



## About preparing a further submission on a proposed plan change

### You must use the prescribed form

- [Clause 8](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires further submissions to be on the prescribed form.
- The prescribed form is set out in [Form 6](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 6. While you do not have to use this template, your submission must be in accordance with Form 6.

### Certain persons may make further submissions

- Under clause 8, Schedule 1 of the RMA the following persons may make a further submission, in the prescribed form, on a proposed plan to the relevant local authority:
  - any person representing a relevant aspect of the public interest
  - any person that has an interest in the proposed policy statement or plan greater than the interest that the general public has
  - the local authority itself.
- You will need to explain why you meet one of these categories (space is provided in the form for this below).

### Your further submission and contact details will be made publicly available

- [Section 352](#) of the RMA allows you to choose your email to be your address for service. If you select this option, you can also request your postal address be withheld from being publicly available. To choose this option please tick the relevant boxes below.

### Note to person making the submission

- A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority (Kāpiti Coast District Council).

### Reasons why a further submission may be struck out

Please note that your further submission (or part of your further submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the further submission (or part of the further submission):

- it is frivolous or vexatious
- it discloses no reasonable or relevant case
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further
- it contains offensive language
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## To Kāpiti Coast District Council

Further Submission in Support of (or Opposition to) a Submission on Proposed Plan Change to the Operative Kapiti Coast District Plan 2021

Plan Change Number: 2

Plan Change Name: Intensification

## Further submitter details

<b>Full name of person making further submission:</b> Toka Tū Ake EQC
<b>Contact person (name and designation, if applicable):</b> Jo Horrocks
<b>Postal address (or alternative method of service under section 352 of the RMA):</b>
<b>Telephone:</b>
<b>Electronic address for service of person making further submission (i.e. email):</b> resilience@eqc.govt.nz
<b>I would like my address for service to be my email</b> <i>[select box if applicable]</i> <input checked="" type="checkbox"/>
<b>I have selected email as my address for service, and I would also like my postal address withheld from being publicly available</b> <i>[select box if applicable]</i> <input type="checkbox"/>

### **State whether you are** *[select appropriate box]*

a person representing a relevant aspect of the public interest.	<input type="checkbox"/>
<i>In this case, also please specify the grounds for saying that you come within this category</i>	
a person who has an interest in the proposal that is greater than the interest the general public has.	<input checked="" type="checkbox"/>
<i>In this case, also please explain the grounds for saying that you come within this category</i>	
Toka Tū Ake EQC is a Crown Entity responsible for providing insurance to residential property owners against the impact of natural hazards. We also invest in and facilitate research and education about natural hazards, and methods of reducing or preventing natural hazard damage. The contingent liability associated with natural hazard risk in New Zealand is high and is carried, in large part, by Toka Tū Ake on behalf of the Crown. Toka Tū Ake therefore has a strong interest in reducing risk from, and building resilience to, natural hazards in New Zealand.	
the local authority for the relevant area.	<input type="checkbox"/>

### Scope of further submission

<input type="checkbox"/> I support	<input type="checkbox"/> oppose	<input checked="" type="checkbox"/> the submission of:
<b>Original Submitter's Name and Address for Service:</b> Kāinga Ora Homes and Communities developmentplanning@kaingaora.govt.nz		
<b>Submission number of original submission:</b> S122		

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. While it is not a requirement, it would be helpful if you could state the submission point number as listed in the summary of decisions requested document.*

**SUPPORT.** - S122.15.

- All qualifying matters be identified by District Plan overlays, with supporting overlay provisions contained within Part 2 General District-Wide section of the District Plan.

**OPPOSE.** - S122.71.

- Remove reference to flood hazard mapping within the chapter and identify all flood hazard mapping as a non-statutory document. Consequential amendments will be required to remove and amend references to the flood hazard mapping.

### **The reasons for my support (or opposition) are:**

<i>[give reasons]</i>
S122.15. Toka Tū Ake supports the use of qualifying matters to limit development and building in areas subject to natural hazard risk. We support the use of regulatory overlay maps to spatially identify areas at risk and limit inconsistency when applying rules limiting development in these areas.
S122.71. Accurate and risk-based regulatory hazard map overlays are an important tool in Kapiti Plan Change 2 to limit subdivision and development within areas subject to identified natural hazard risk. Removing part or all of these regulatory overlays, opens the possibility that rules controlling development in flood-prone areas will be inconsistently applied, exposing people and their properties to unnecessary flood risk.
Toka Tū Ake encourages the use and expansion of regulatory flood-hazard maps based on up-to date science and modelling. We are of the opinion that Kāinga Ora's submission that flood maps should be removed from the plan should be disallowed.

### **I seek that**

The whole of submission S122.15 be allowed, and The whole of submission S122.71 be disallowed.
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I support <input checked="" type="checkbox"/>	oppose <input type="checkbox"/>	the submission of:
<b>Original Submitter's Name and Address for Service:</b>		
Waka Kotahi		
<b>Submission number of original submission:</b> S053		

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. While it is not a requirement, it would be helpful if you could state the submission point number as listed in the summary of decisions requested document.*

**SUPPORT-** S053.18. - Rezoning 160-222 Main Road and 39 Rongomau Lane, Paraparaumu

- Request further site-specific assessments to justify the need for additional greenfield zoned land in this location (after the additional capacity provided by the intensification provisions), assess accessibility to active and public transport, hazards, infrastructure requirements (including stormwater) and any reverse sensitivity issues.

**The reasons for my support (or opposition) are:**

[give reasons]

S053.18.

Toka Tū Ake agrees that greenfield development in areas subject to natural hazard risk, in this case flooding, should only be undertaken where such development is strictly necessary, and where the hazard risk has been fully investigated and reduced to minimum levels for residents. Further site-specific investigation of stormwater constraints in new greenfield residential developments in areas at risk of flooding is recommended to minimise any risk posed by excess stormwater runoff and flooding.

**I seek that**

The whole of submission S053.16. be allowed

I support	<input checked="" type="checkbox"/>	oppose	<input type="checkbox"/>	the submission of:
<b>Original Submitter's Name and Address for Service:</b>				
Greater Wellington Regional Council				
<b>Submission number of original submission:</b> S097				

*Clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal. While it is not a requirement, it would be helpful if you could state the submission point number as listed in the summary of decisions requested document.*

**SUPPORT** - S097.21 - Rezoning Waikanae

- Remove General Residential Zone from river corridors, and amend to a more appropriate zoning, such as open space.

**SUPPORT** - S097.22 - Flood Hazard Overlays

- Ensure the most recent flood hazard maps are used as qualifying matters in the District Plan.

**The reasons for my support (or opposition) are:**

[give reasons]

S097.21  
 Toka Tū Ake considers that intensification and development should only occur in areas at minimal risk from natural hazards, and as such we support removal of residential zones from areas at higher risk. In this case, river and stream corridors pose higher flood hazard to life and property than ponding areas, as the flow rate and depth of water in a flood event is higher, and residential areas should not be zoned in areas which contain stream corridors.

S097.22  
 Toka Tū Ake encourages the use and expansion of regulatory flood-hazard maps based on up-to date modelling. If newer, more accurate estimates of flood extents are available, we support the Kapiti District Plan updating their regulatory flood overlays to reflect that research.

**I seek that**

The whole of submission S097.04 be allowed,

The whole of submission S097.21 be allowed, and

The whole of submission S097.22 be allowed.

**Hearing Submissions** [select appropriate box]

I wish to be heard in support of my further submission.	<input type="checkbox"/>
I do not wish to be heard in support of my further submission.	<input checked="" type="checkbox"/>
<i>If you wish to be heard, please tick one of the following</i>	
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input type="checkbox"/>
If others make a similar submission, I will not consider presenting a joint case with them at a hearing.	<input checked="" type="checkbox"/>



18/11/2022

Signature of person making a further submission  
(or person authorised to sign on behalf  
of person making further submission)

Date

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

Email your further submission to <a href="mailto:district.planning@kapiticoast.govt.nz">district.planning@kapiticoast.govt.nz</a> or post/deliver to:  Attn: District Planning Team Kāpiti Coast District Council 175 Rimu Road Paraparaumu 5032	For office use only
	Further submission No: S101.FS.1

**From:** [Tabitha Bushell](#)  
**To:** [Mailbox - District Planning](#)  
**Subject:** EQC further submission on Plan Change 2  
**Date:** Friday, 25 November 2022 9:40:23 am  
**Attachments:** [image001.png](#)  
[EQC further submission on KCDC Proposed District Plan.pdf](#)

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Kia ora Koutou,

Attached is Toka Tū Ake EQC's further submission on the Kapiti Coast Proposed plan Change 2, which I am sending on behalf of Jo Horrocks, Chief Resilience & Research Officer.

Please do not hesitate to contact us regarding this submission, but please direct all emails to [resilience@eqc.govt.nz](mailto:resilience@eqc.govt.nz).

Sincere apologies for the late submission.

Ngā mihi,

**Tabitha Bushell**

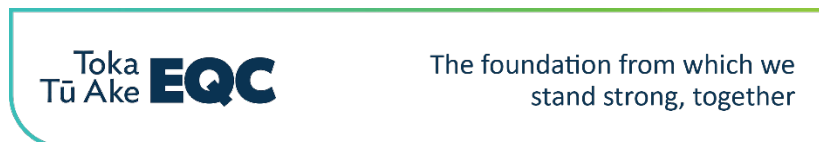
**Advisor, Risk Reduction & Resilience | Kaitohutohu Whakaiti Mōrea me te Manahau**

Toka Tū Ake | EQC

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[EQC's Resilience Strategy for Natural Hazard Risk Reduction](#)

[EQC Resilience and Research Programme](#)



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