

OIR: 2324/893

10 May 2024

[REDACTED]
[REDACTED]

Tēnā koe [REDACTED]

Request for Information under the Local Government Official Information and Meetings Act 1987 (the Act) (the LGOIMA)

Thank you for your email of **16 April 2024** requesting the following information. The request was made to Councillor Handford who passed on your correspondence to be answered by Council staff.

1. *The Jacobs Report does not meet the statutory requirements of the NZCPS (NZ Coastal Statement Policy). Therefore, why is it being used for the purposes of district planning?*

To clarify, Council has not progressed a district plan change that uses the Jacobs Report. I can confirm that where future changes to the Operative Kapiti Coast District Plan 2021, such as the planned coastal plan change, are progressed:

- Any evidence (including but not limited to coastal science) used will be tested through public submissions, and a hearing of those submissions by an independent hearings panel.
- Submissions on any proposed changes are open to the public, and I encourage you to participate in that process when the time comes to do so to raise any concerns you may have.

Regarding your query around the Jacobs report, and compliance with the statutory requirements of the New Zealand Coastal Policy Statement (NZCPS), I would like to clarify that the NZCPS, Policy 24 requires that coastal hazards:¹

- *“Identify areas in the coastal environment that are potentially affected by coastal hazards (including tsunami), giving priority to the identification of areas at high risk of being affected. Hazard risks, over at least 100 years, are to be assessed” “taking into account national guidance and the best available information on the likely effects of climate change on the region or district”.*

¹ This is only a partial quote from Policy 24. For the full text of Policy 24 please see:

<https://www.doc.govt.nz/about-us/science-publications/conservation-publications/marine-and-coastal/new-zealand-coastal-policy-statement/new-zealand-coastal-policy-statement-2010/>

Please note that any information provided in response to your request may be published on the Council website, with your personal details removed.

- The national guidance for coastal matters is set by the Ministry for the Environment (MfE) and the Department of Conservation (DoC).

On the basis of my comments around the NZCPS, I can confirm that:

- The Jacobs Report was independently peer reviewed by experts in Beca and Greater Wellington Regional Council. Those peer reviews are appended to the end of [the Jacobs Report](#).
- Criticisms formally raised around Jacobs work were shared with the MfE and DoC, who have supported the approach taken by Jacobs. You can read this correspondence on the [Takutai Kapiti Documents page](#) (look under the heading “Kāpiti Coast District Council clarification request to Central Government”).
- Since the Jacob’s Report was released, there have been updates to international and central government guidance. The MfE and DoC have [confirmed expectations around use of SSP5-8.5](#), and as a result of the updated advice from the Ministry an [addendum](#) to the Kāpiti Coast Coastal Hazards Susceptibility and Vulnerability Assessment has been released. This provides the most current advice, and should now be referred to.

2. Does it sit well with you that CAP is using science that the IPCC says is implausible, and how will you inform residents in the community that elected you, that they are all adversely affected and may have to leave their homes?

The science that CAP is using, as recently updated by the [addendum](#) to the Kāpiti Coast Coastal Hazards Susceptibility and Vulnerability Assessment, follows guidance provided by DoC and MfE. I am not aware of the IPCC making any statements about the science that CAP is using.

However, Council forwarded concerns raised by the Coastal Ratepayers United, related to the IPCC, to central government for comment and the MfE clarified that:

“The critique of the Jacobs Addendum incorrectly quotes IPCC AR6 as referring to SSP5-8.5 as “implausible”. Instead, the AR6 report describes high-end scenarios like SSP5-8.5 as having become ‘considerably less likely since AR5 but cannot be ruled out’. They caution their use to being for exploring ‘high-end risks of climate change’ (See Box 3.3 and FAQ 3.3, Chapter 3, WGIII of the IPCC (2022))”.

This statement is included within the response letter from MfE on the [Takutai Kapiti Documents page](#) (look under the heading “Kāpiti Coast District Council clarification request to Central Government”).

To clarify, the science that CAP is using is to support making recommendations to the Council on coastal adaptation. Council has not yet received these recommendations, and has made no decisions that would require people to leave their homes.

Council is expecting to receive the CAPs Report and recommendations in June 2024. Following this, Council expects to undertake further consideration and engagement with the community before decisions are made.

3. Does it concern you that there is a district-wide placement of hazard notices (with reference to Jacob's) on ALL Kapiti residents' LIM reports WITHOUT COMMUNITY CONSULTATION?

I confirm that Council has added the following note on all LIMs since February 2022:

“Coastal Erosion and Inundation Hazards

Council holds a set of reports prepared by environmental engineering consultancy Jacobs NZ Ltd covering susceptibility and vulnerability assessments of the coastal areas of the District based on a range of sea level rise scenarios over periods of 30, 50 and 100 years. The Council intends using these reports to inform future district plan work which will consider any necessary changes to land use and subdivision controls in areas which may be affected. Various parties have raised concerns regarding the approach taken in those reports. Those concerns will be addressed during consideration of the submissions received during the plan change process. The information on coastal hazards that the Council holds is available on the following link: www.kapiticoast.govt.nz/coastal-science”

To clarify, Council included this note on all LIMs to ensure compliance with statutory obligations for LIMs in the Local Government Official Information and Meetings Act 1987 (LGOIMA). There was significant community discussion and media interest in the addition of coastal hazard information at this time, as illustrated in the article [Council endeavour to map coastal hazards on Kāpiti Coast riles residents group | Stuff](#)

I can confirm that community consultation on the contents of LIMs **is not** required by that Act; however, given concerns raised at that time, the specific wording of this note was informed by useful feedback from the Group: Coastal Ratepayers United.

Ngā mihi,



Kris Pervan

Group Manager Strategy and Growth
Te Kaihautū Rautaki me te Tupu