

Submission on notified proposal for plan change



About preparing a submission on a proposed plan change

You must use the prescribed form

- [Clause 6](#), Schedule 1 of the Resource Management Act 1991 (RMA) requires submissions to be on the prescribed form.
- The prescribed form is set out in [Form 5](#), Schedule 1 of the Resource Management (Forms, Fees, and Procedure) Regulations 2003.
- This template is based on Form 5. While you do not have to use this template, your submission must be in accordance with Form 5.

Your submission and contact details will be made publicly available

- In accordance with [clause 7](#) of Schedule 1 of the RMA, the Council will make a summary of your submission publicly available. The contact details you provide will also be made publicly available, because under [clause 8A](#) of Schedule 1 of the RMA any further submission supporting or opposing your submission must be forwarded to you by the submitter (as well as being sent to Council).
- [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.

Reasons why a submission may be struck out

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

Submission on Proposed Plan Change 2 to the Operative Kapiti Coast District Plan 2021

Submitter details

Full name of Submitter: Toka Tū Ake EQC
Contact person (name and designation, if applicable): Jo Horrocks
Postal address (or alternative method of service under section 352 of the RMA): PO Box 311, Wellington 6140
Telephone:
Electronic address for service of submitter (i.e. email): resilience@eqc.govt.nz

I would like my address for service to be my email [select box if applicable] Yes



I have selected email as my address for service, and I would also like my postal address withheld from being publicly available [select box if applicable]



Scope of submission

The specific provisions of the proposed plan change that my submission relates to are:
[give details]

1. 20.11 – Definitions Chapter – Qualifying Matter Areas
2. 19.0 – District Plan Maps – Hazards and Risks

Continue on a separate sheet if necessary

Submission

My submission is: [include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

20.11 – Definitions Chapter – Qualifying Matter Areas – **Amend**

19.0 – District Plan Maps – Hazards and Risks – **Amend**

The Kapiti Coast is at risk from numerous natural hazards including fault rupture, flooding and coastal erosion, which are provided for in this plan change; and tsunami and liquefaction, which are not. We support the use of qualifying matters to avoid residential intensification in flood hazard and fault avoidance zones in Proposed Plan Change 2. We also support the creation of the Coastal Qualifying Matter Precinct to avoid intensification of land at risk of coastal erosion until further environmental plans can be made.

However, the Kapiti Coast is a low-lying district with multiple coastal communities, and these are at risk of inundation by tsunami. While the west coast of the North Island has less tsunami risk than the east coast because it is not near a subduction zone, nowhere in New Zealand is free of tsunami risk, and there are multiple potential sources of tsunami in the South Taranaki Bight and Cook Strait. These sources include offshore faults, submarine landslides, and volcanic activity from Taranaki maunga. These sources may create tsunami which could reach the Kapiti Coast in less than 30 minutes and may have little warning¹. With no official warning likely in a locally sourced tsunami event, people on the Kapiti Coast would need to rely on natural warnings and knowing what to do i.e. the best route to use to evacuate, and how. Research into evacuation rates in Aotearoa New Zealand² found that in 2015 around one third of people did not intend to evacuate or evacuate fast enough, and a similar response occurred in Kaikoura in 2016. This could lead to many deaths and injuries if a major tsunami were to occur. Evacuation modelling by GNS Science indicates that there are Kapiti Coast settlements from which it may take 30 minutes to an hour for a person to evacuate to outside the tsunami hazard zone at average walking speed³ (Figure 1). While relying on warnings is one aspect of managing the tsunami risk, it should not be the only option due to:

1. the lack of official warnings if a locally sourced event occurs;
2. the amount of education, planning and exercising required with communities so they understand when and how to evacuate;
3. the expected rate of evacuations i.e. ~30% may not self-evacuate; and
4. the time it may take some communities to evacuate to a safe area.

¹ Wang X, Lukovic B, Mueller C, Heron DW, Power WL. 2021. Tsunami travel time estimates for local sources for Porirua and Kapiti Coast suburbs. Lower Hutt (NZ): GNS Science. 39 p. (GNS Science Report; 2020/06). doi:10.21420/RAVV-9Q93

² Dhellemmes et al, 2021. Tsunami awareness and preparedness in Aotearoa New Zealand: The evolution of community understanding. International Journal of Disaster Risk Reduction 65.

³ Heron DW, Lukovic B, Wang X, Power WL. 2019. Evacuation time estimates for local source tsunami for Porirua and Kapiti suburbs. Lower Hutt (NZ): GNS Science. 192 p. (GNS Science Report; 2019/79). doi:10.21420/YH6M-D367.

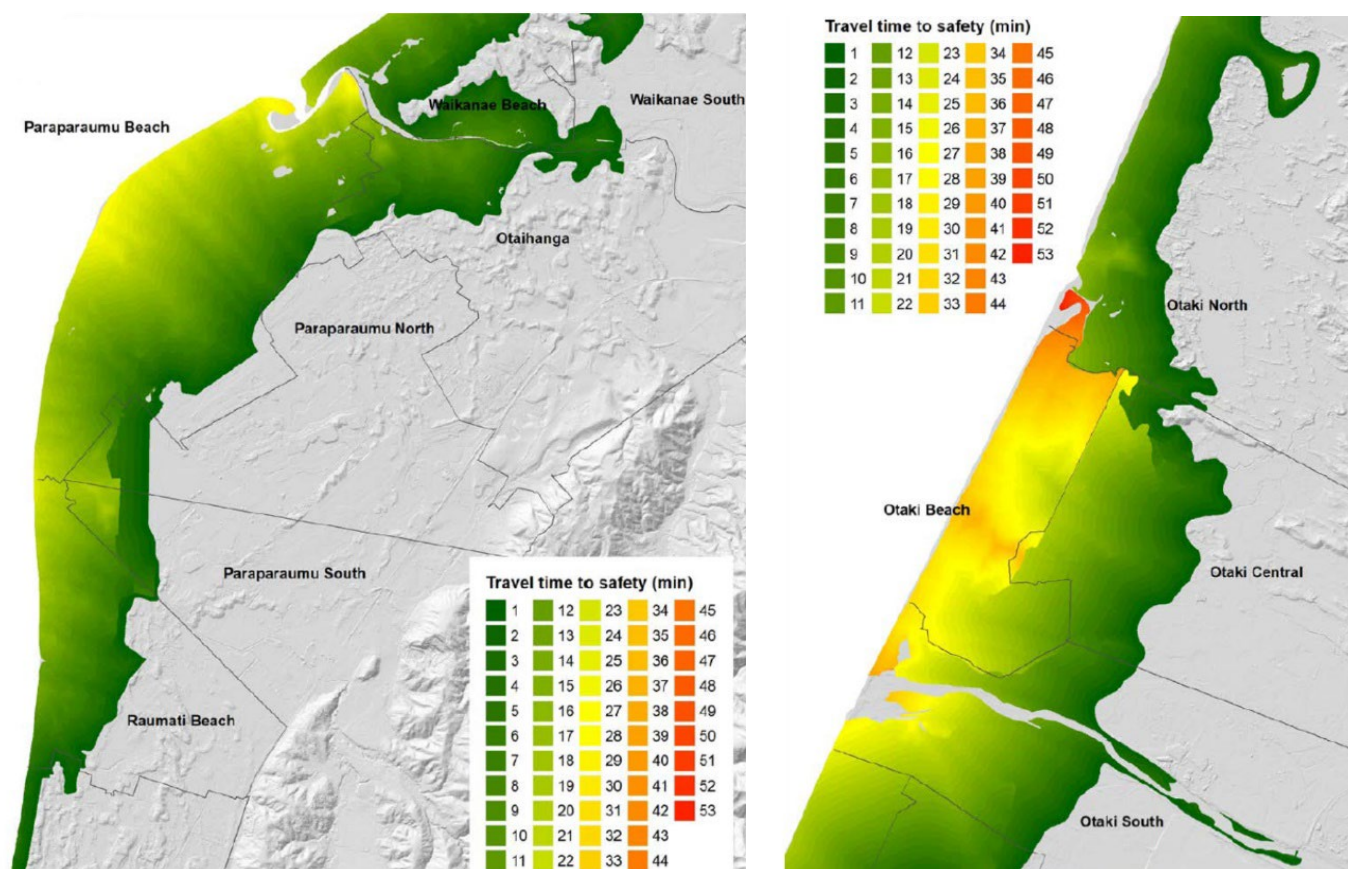


Figure 1. Modelled evacuation time for select areas of the Kapiti Coast. Local source tsunami may reach the coast within ten minutes (Heron et al, 2019)

Continue on a separate sheet if necessary

I seek the following decision from the Kāpiti Coast District Council: [give precise details]

In response to the concerns outlined above, Toka Tū Ake EQC seek the following decisions:

1. Add liquefaction hazard to the list of qualifying matter areas.
2. Add Greater Wellington liquefaction hazard maps as a district overlay.
3. Add provisions to the District Plan to restrict Buildings of Importance Category (BIC) 3⁴ or higher in areas at highest risk of tsunami inundation and in those areas which are more difficult to evacuate.

If you have any questions about this submission, please do not hesitate to contact us via email.

Continue on a separate sheet if necessary

⁴ BIC 3 includes structures that, as a whole, may contain people in crowds or contents of high value to the community or pose risks to people in crowds. These include emergency medical and healthcare facilities, educational facilities, buildings where more than 300 people can congregate in one area, airport terminals, principal railway stations, facilities containing hazardous materials, power generating, water treatment and wastewater facilities, and structures with an occupancy load greater than 5000.

Hearing Submissions [select appropriate box]

I wish to be heard in support of my submission.	<input type="checkbox"/>
I do not wish to be heard in support of my submission.	<input checked="" type="checkbox"/>
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"/>



15/09/2022

Signature of Submitter
(or person authorised to sign on behalf of submitter)

Date

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

Trade Competition [select the appropriate wording]

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ / I could not ☒ gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission, please complete the following:

I am ☐ / I am not ☒ directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

Email your submission to district.planning@kapiticoast.govt.nz or post/deliver to:

Attn: District Planning Team
Kāpiti Coast District Council
175 Rimu Road
Paraparaumu 5032

For office use only
Submission No: