

DDPR_feedback_0117s		
	Name	James White
	Organisation	
	Email	[REDACTED]
	Response Date	Aug 31 22
	Notes	
Q1	Select the chapter you want to provide feedback on	
Q2	In general, to what extent do you support the contents of this chapter?	
Q3	Objective/Policy/Rule/Standard reference:	
Q4	Feedback/Comments	
Q5	Objective/Policy/Rule/Standard reference:	
Q6	Feedback/Comments	
Q7	Objective/Policy/Rule/Standard reference:	
Q8	Feedback/Comments	
Q9	Objective/Policy/Rule/Standard reference:	
Q10	Feedback/Comments	
Q11	supporting documents?	
	0	
Q12	If you need more space, or have any other general comments, please leave them here	
	<p>Tēnā koe We hereby submit        feedback to the draft Waitaki District Plan relating to our property at 9        Kakaunui Bay Road, Kakanui. Please find attached our feedback submission        document setting out the basis of the feedback. We trust all the required        information is enclosed, but please do not hesitate to contact me for any        matter. We look forward to your considered response in due course. Ngā mihi        nui James &amp; Lucianne White</p>	

# DRAFT DISTRICT PLAN FEEDBACK

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August 2022

**To:** Draft District Plan Feedback  
Waitaki District Council  
Private Bag 50058  
Ōamaru 9444

**Submitter:** James & Lucianne White

**Location:** 9 Kakaunui Bay Road, Kakanui, Ōamaru

**Legal Descriptions:** Lot 2 Deposited Plan 518350 and Allotment 9-11, 14-21 Block I and Allotment 1-7, 16-22 Block II Deposited Plan 15 (812038)

**Operative District Plan:** Rural General Zone  
Significant Coastal Landscape  
High Class Soils

**Draft District Plan:** General Rural Zone  
Coastal Area of Degraded Natural Character  
Coastal Environment  
Coastal Protection  
Coastal Erosion Line  
Outstanding Natural Feature (ONF060)  
Sites of Significance to Māori (SASM024)  
Highly Productive Land - Class 3  
Liquefaction – B  
Coastal Inundation Hazard  
Tsunami Hazard Area



James & Lucianne White

**Addresses for Service:**  
James & Lucianne White  
9 Kakaunui Bay Road  
RD 4 O  
Ōamaru 9495

By email: [REDACTED]

## **FEEDBACK ON DRAFT WAITAKI DISTRICT PLAN**

### **Feedback and Outcome Sought:**

This feedback relates to the land located at 9 Kakaunui Bay Road, Kakanui, Ōamaru, being legally described as Lot 2 Deposited Plan 518350 and Allotment 9-11, 14-21 Block I and Allotment 1-7, 16-22 Block II Deposited Plan 15 (812038).

The feedback and outcomes sought are as follows:

#### ***Outcome 1: Amend Outstanding Natural Feature Overlay slightly***

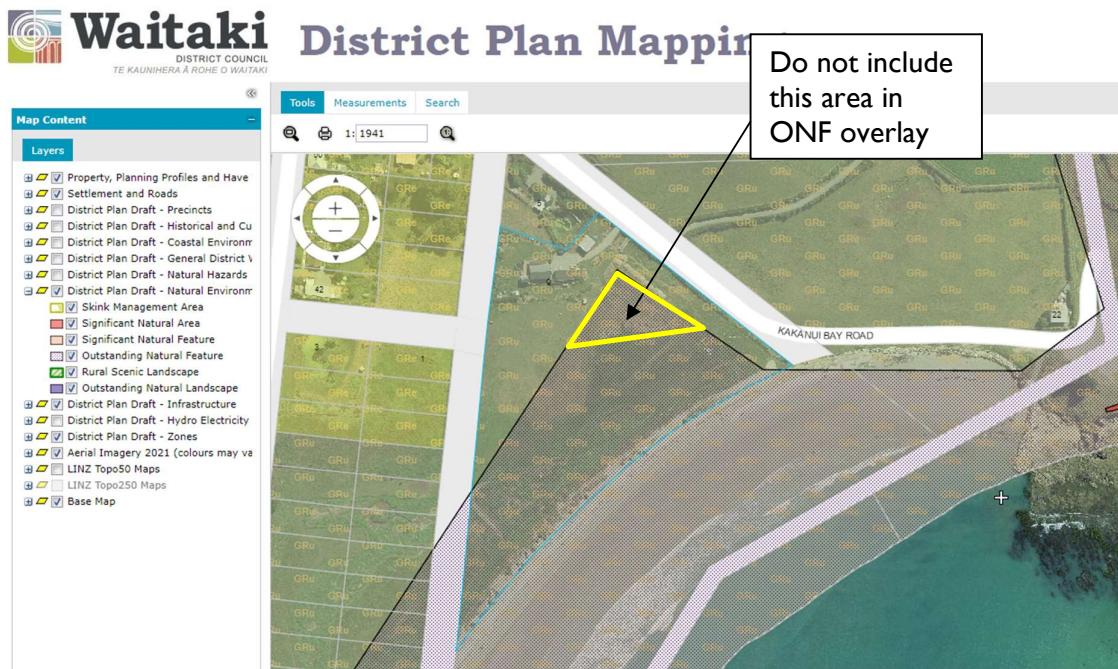
The Draft District Plan shows our land as being subject to a 'Outstanding Natural Feature ONF060' overlay.

Generally, we have no issue with the Outstanding Natural Feature overlay (although see comments below re Historic Values) and support protection of the coastal environment in this location but seek that a small area of the Outstanding Natural Feature overlay be amended. The small area requested to be removed is shown in Figure 1 below and amounts to a small triangular area of approximately 1000m<sup>2</sup>.

This area is low lying with a slight north-westerly aspect, looking away from the coast towards our dwelling. This small area forms part of our amenity living area associated with our dwelling, and we have enhanced this area with native plantings, a small bike track and camping bays for family, friends and visitors. There is a low but definitive ridge between this area and the beach running parallel with the beach, which forms a natural boundary along which the ONF overlay should naturally run. Once the native plantings are established, they will effectively screen our amenity area and buildings from the coast, enhancing the natural character of the coastline and aesthetic values as experienced by the public walking along the gravel bar above the beach (which is part of our property but we gladly allow).

#### **Historic Values**

Please note that the draft District Plan Schedule of Outstanding Natural Features (SCHED7, pages 31-32) showing the ONF060 information table refers to there being no known historic values associated with the Kakanui River Mouth. That is not so. There is an extensive known history where Kakanui was the site of a large Meat Processing Factory, and the Kakanui Harbour was established in the 1860s-1870s. We suggest you consult Heritage New Zealand regarding the appropriateness of including such information in the ONF060 information table.



**Figure 1:** Screenshot of draft District Plan mapping showing the subject land and surrounding zoning and environment, as well as the area of Outstanding Natural Feature overlay sought to be removed by this feedback (yellow border).



**Figure 2:** Photograph looking southwards across our property (from within private property) showing the approximate Outstanding Natural Feature overlay (black line) with the area sought to be removed by this feedback (yellow border).



**Figure 3:** Photograph looking southwards across our property showing the approximate Outstanding Natural Feature overlay (black line) with the area sought to be removed by this feedback (yellow border).



**Figure 4:** Photograph looking westwards across our property showing the approximate Outstanding Natural Feature overlay (black line) with the area sought to be removed by this feedback (yellow border).

## **Outcome 2: Amend Coastal Erosion Line**

The Draft District Plan shows the land as being subject to a ‘Coastal Erosion’ overlay.

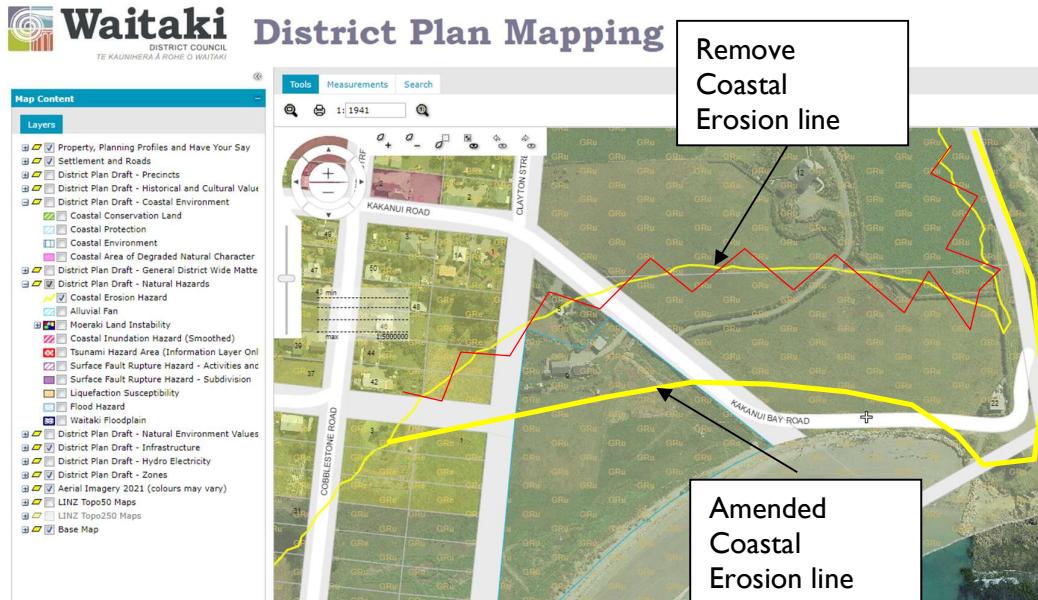
This feedback seeks that the Coastal Erosion overlay be amended as shown in Figure 4 below.

It is not good enough to simply draw a line and expect landowners to assess whether it is correct or not, potentially incurring significant cost to prove the line wrong. As regulator, the onus is on Council to properly investigate and get the line as accurate as possible before incorporating it into the District Plan.

Generally, there appears to be no background report or evidence relating to the line drawn along the coastline. The Council needs to explain how the line was drawn and release all information it holds on coastal erosion in the area so that landowners can understand and assess their property against it.

It is submitted that the Coastal Erosion overlay needs to be reviewed in terms of the underlying geology, topography, and the complex interaction between the two headlands at Kakanui, the stone dune system and the Kakanui River. We are aware that a Geological Report pertaining to the area was commissioned by our neighbour and we are confident we can source it and provide it to Council as part of an overall assessment of the Coastal Erosion risk.

Should Council not move the line as shown in Figure 4, it is requested that Council commission an independent expert consultant to ground truth and report on the Coastal Erosion overlay as it applies to our property.



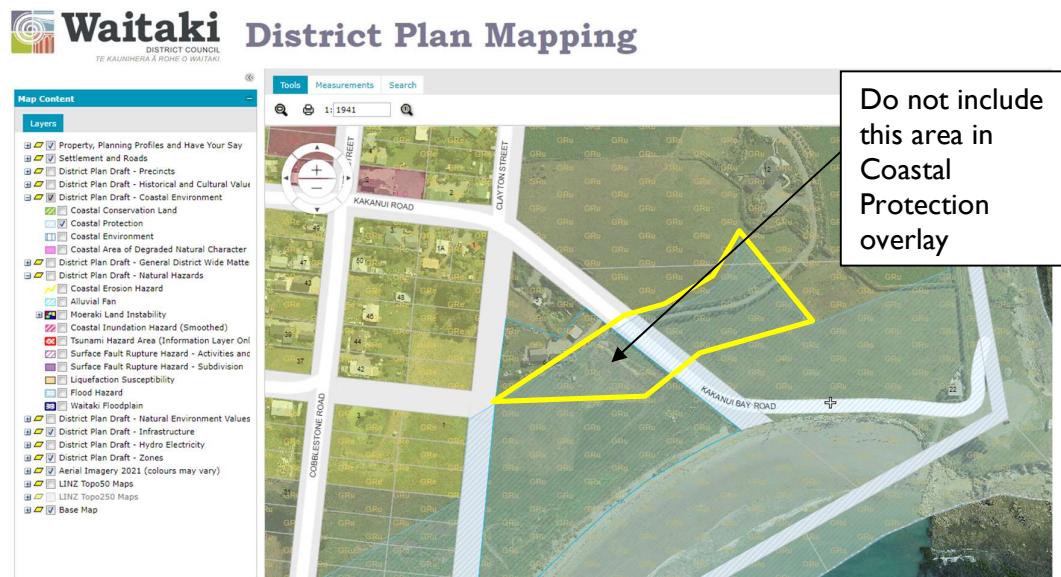
**Figure 4:** Screenshot of draft District Plan mapping showing the subject land and surrounding zoning and environment, as well as the amendments to the Coastal Erosion overlay sought by this feedback (yellow border).

### **Outcome 3: Amend Coastal Protection Overlay**

The Draft District Plan shows the land as being subject to a ‘Coastal Protection’ overlay.

This feedback seeks that the Coastal Protection overlay be amended as shown in Figure 5 below.

As described above, the area we wish to removed from the Coastal Protection overlay is low lying with a slight north-westerly aspect, looking away from the coast towards our dwelling. This small area forms part of our amenity living area associated with our dwelling, and we have enhanced this area with native plantings, a small bike track and camping bays for family, friends and visitors. There is a low but definitive ridge between this area and the beach running parallel with the beach, which forms a natural boundary along which the Coastal Protection overlay should naturally run. Once the native plantings are established, they will effectively screen our amenity area and buildings from the coast, enhancing the natural character of the coastline and aesthetic values as experienced by the public walking along the gravel bar above the beach (which is part of our property but we gladly allow).



**Figure 5:** Screenshot of draft District Plan mapping showing the subject land and surrounding zoning and environment, as well as the area of Coastal Protection overlay sought to be removed by this feedback (yellow border).

### **Outcome 4: Amend Coastal Inundation Hazard (Smoothed) Overlay**

The Draft District Plan shows the land as being subject to a ‘Coastal Inundation Hazard (Smoothed)’ overlay.

This feedback seeks that the Coastal Inundation Hazard (Smoothed) overlay be removed from the property entirely.

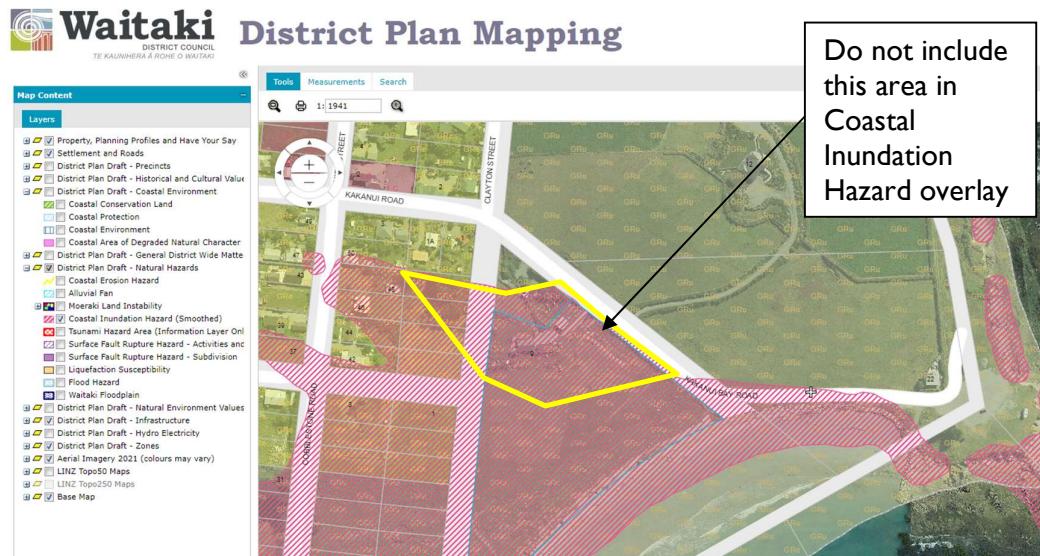
There is a low but definitive ridge running parallel with the beach, which forms a natural barrier to flooding and inundation from the coast. In addition, an existing drainage channel runs along

the landward side of the stone dune system, connecting with the Kakanui Estuary at the southern end of our property (Figure 7). This drainage channel is important, not just for our property, but for a number of residential properties in the Kakanui Township to the west, where a low lying swale extends into this area (bypassing our dwelling). A further drainage channel exists down Cobblestone Road. Both drainage channels are crucial for directing both stormwater and coastal inundation water away from properties and assets in the subject area. However, the channels have not been maintained and are in states of disrepair, creating flooding risk now, let alone in the future. A review of the drainage system in the area is sought urgently as part of this process.

As stated above, it is not good enough to simply draw a line and expect landowners to assess whether it is correct or not, potentially incurring significant cost to prove the line wrong. As regulator, the onus is on Council to properly investigate and get the line as accurate as possible before incorporating it into the District Plan.

We are not aware of any background report or evidence relating to the coastal inundation area. The Council needs to explain to the affected Kakanui Community how the line was drawn and release all information it holds so that landowners can understand and assess their property against it.

It is submitted that the Coastal Inundation area needs to be reviewed in terms of the underlying geology, topography, and the complex interaction between the two headlands at Kakanui, the stone dune system and the Kakanui River. Should Council not amend the area as shown in Figure 6, it is requested that Council commission an independent expert consultant to ground truth and report on the Coastal Erosion overlay as it applies to our property.



**Figure 6:** Screenshot of draft District Plan mapping showing the subject land and surrounding zoning and environment, as well as the area of Coastal Inundation Hazard (Smoothed) overlay sought to be amended by this feedback (yellow border).



**Figure 7:** Aerial photo and annotation showing the existing important drainage network that assists in directing both stormwater and coastal inundation water away from properties and assets in the subject area.

### Conclusion:

We request that Council give favourable consideration to this feedback and we are happy to work alongside Council and supply further information if required.

We look forward to your response in due course.

Regards

A handwritten signature in black ink, appearing to read "White".

James & Lucianne White