

Waikanae North Developments Project (WNDP) – Invitation to Comment under Fast -Track Approvals Act 2024 (FTAA24)

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2. We will email you draft conditions of consent for your comment			
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Comments

Introduction and Summary

Thank you for the opportunity to comment on the updated conditions for the Waikanae North Development (WND and Applicant) Project application (the Project) for various consents/approvals under the FTAA2024. We are the owners/occupiers of [REDACTED], PekaPeka.

We have reviewed the updated conditions and consider:

- the changes make no substantive difference or mitigations to the issues we have raised in our previous response;
- that WND updated conditions take little or no account of issues raised by neighbours who are largely negative to the development in its current form and reflect the applicants lack of consideration of the existing PekaPeka eco-system.

For the avoidance of doubt we summarise our concerns about the WND project below:

- is inconsistent, disproportionate and significantly adverse to the existing local eco-system and seeks to destroy/erode the character of the site including the existing Rural Dunes Precinct (Special Designation Area) which covers virtually all of the site;
- the urban configuration lacks the adoption of new homes development sustainability and technology choices in critical areas of fresh water, waste-water and climate change resilience, and as a consequence the proposed land use has significant adverse effects in these areas;

- adopts highly contestable assumptions and presents information and conclusions which lack robustness, are unproven and non-persuasive to justify the benefits presented including traffic mitigations, regional economic benefits and contributions to housing supply and affordable housing; and
- does not demonstrate a design philosophy which could create a more imaginative and sustainable rural residential solution for this unique Kapiti location.

Examination and analysis of the SA demonstrates that the cumulative impact of the adverse effects are significant and mitigations weak or minor, while the regional and national benefits are low or moderate, and therefore the extent of the adverse effects are out of proportion to the benefits. As set out in the FTAA, the SA should be declined by the Panel, or significant additional conditions applied before acceptance is justified.

We also take the opportunity to comment on responses by the Applicant dated 11 August 2026 to our previous comments (references relate to the Applicant's Response).

P6 Density and minimum size of lot: we disagree with the Applicant's response argument. The number of lots (and lot size) has been maximised to increase the Applicant's yield and economics and totally disregards the interface with surrounding rural environment – it does not achieve an appropriate outcome.

P7 Consistency with Rural Dunes Precinct and SAL provisions: the Applicant acknowledges the destruction of the rural sand dunes and SAL with no mitigation. Protection of the ridge lines is a marginal concession.

P11 Carbon and sustainability conditions: the Applicant response is weak with no analysis of carbon sequestration while the local centre may or may not materialise or be economic to sustain itself. Respectfully the Minister of Climate Change presents no analysis to support his comment.

6.2 Economics: The Applicant seeks to confuse matters. The essence of the Frontier (non-partisan economics review) was that, irrespective of some aspects of computation referred to by Bal Mathieson, significant aspects of the economic and impact on housing supply were critically flawed. Given that the economic and housing benefits assumed by the Applicant are central and foundational to the FTAA framework, then it follows that the Applicant's analysis is weak, unconvincing and inconclusive.

Ee2 Scale of economic benefits relied on: the Applicant simply restates its own numbers and implies that annualization isn't appropriate and a dilution of the benefits, when in fact it is the choice of the Applicant to spread the development over 10 – 15 years and causes the dilution. In our comments we referenced the annual economic benefits against the district's annual GDP and determined that the economic benefit to the district was around 1%. An alternative could have been to take the gross GDP claimed by the Applicant over the development time frame (10 – 15 years) and divide by the forecast district GDP over the equivalent timeframe – which would yield a similar percentage contribution, and would remain immaterial.

The Applicant suggests our comments are not accepted on the basis that the commentators' have no claimed economic expertise. While it doesn't take any great numeric or reasoning skills

to analyse the Applicant's economic argument and uncover the flaws, we can advise that our backgrounds include degrees in finance, economics and maths, and +30 years experience working in the financial sector, investment case analysis, infrastructure development and governance.

Further, the FTAA legislation does not refer to or imply that benefits should be assessed based on or have regard to previous FTAA precedents, but rather that it is for the Panel to assess the merits of the proposal based on the information presented and their own independent critical reasoning and analysis.

A central tenant of the FTAA is that the adverse effects are assessed against the economic benefits, and deeper analysis of the Applicant's attributed economic benefits shows a very low threshold compared to the significant adverse effects.

Ee3 Housing Affordability: The Applicant has repeated the work of its own paid consultant. Our own limited analysis and that contained in the Frontier report demonstrate significant weaknesses in the Applicant's assessments.

EE5 Ministerial support for housing supply, affordability and construction sector outcomes: respectfully the relevant Ministers simply repeat the Applicant's commentary.

Finally we would note significant recent criticism by Councils such as Auckland and Queenstown Councils of housing FTAA applications and by the Housing Minister Chris Bishop that some housing proposals should be going through the normal RMA process.



For Kevin and Karen Baker

27 August 2026