77 AND 109 KAPITI ROAD AND 1 BRETT AMBLER WAY, PARAPARAUMU

NEW CENTRAL PARK LIMITED

RESOURCE CONSENT APPLICATION TO THE EXPERT CONSENTING PANEL UNDER THE FAST-TRACK APPROVALS ACT 2024

OCTOBER 2026

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AUTHOR	Stephanie Blick – Principal Planner
REVIEW	Ian Leary – Spencer Holmes
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Drafting Note:

1. *The spelling of 'Kapiti' (without a macron) has been adopted throughout this report to align with the spelling preferred and used by Te Ātiawa ki Whakarongotai.*

1. EXECUTIVE SUMMARY

1.1 PROJECT OVERVIEW

1. New Central Park Limited seeks approvals under the Fast-track Approvals Act 2024 ('FTAA') for the New Central Park project at 77 and 109 Kapiti Road and 1 Brett Ambler Way, Paraparaumu. The Project comprises a comprehensive, masterplanned mixed-use development that will provide an extension to the Paraparaumu Metropolitan Centre, integrating residential development, large format retail ('LFR'), other retail and commercial activities, supporting transport and three waters infrastructure, and a network of open space, wetland restoration and flood management areas.

2. The Project will deliver:

   - 593 residential dwellings across a range of typologies, including apartments, townhouses, courtyard housing, duplexes and standalone dwellings, providing a range of dwelling sizes and housing choices;

   - approximately 20,000m² GFA of LFR activities, together with approximately 3,800m² GFA of other retail, commercial and service activities, providing a substantial extension to the existing Paraparaumu Metropolitan Centre;

   - subdivision and site development to create residential, commercial and LFR development lots and superlots, roads to vest, open space and ecological/flood management areas, together with the bulk earthworks, retaining and site formation required to establish the development;

   - a new Town Centre Link Road connecting Kapiti Road with Ihakara Street, supported by east-west connections associated with Iver Trask Place and Brett Ambler Way, a hierarchy of local roads and private accessways, and a layout that does not preclude the potential future Ihakara Street Extension/Airport Link connection;

   - an integrated multi-modal transport network, including dedicated walking and cycling infrastructure, connections with the wider town centre and Wharemaukū Stream corridor, and provision within the Town Centre Link Road corridor to accommodate potential future scheduled public transport services;

   - the three waters and utility infrastructure required to service the development, including water supply, wastewater and stormwater infrastructure and associated stormwater treatment, attenuation and conveyance measures;

   - a new indigenous wetland complex forming the key component of the ecological offsetting and compensation package for wetland loss associated with the Project, with flood storage functions integrated into its design; and

   - an integrated open space network, incorporating the Wharemaukū Stream generally within its existing alignment, riparian and stream enhancement, indigenous wetland and terrestrial planting, fauna management measures, flood management areas, public and private open spaces, and pedestrian and cycle connections through the Site.

3. The Project provides for the coordinated delivery of urban development, transport infrastructure, ecological restoration, open space and flood management outcomes as part of an integrated extension to the existing Paraparaumu Metropolitan Centre.

1.1.1 APPROVALS SOUGHT

4. The Project requires the following consents and approvals under the FTAA:

   - resource consents under the Resource Management Act 1991 ('RMA') for land use and subdivision activities under the Kapiti Coast District Plan, and regional activities under the Greater Wellington

Natural Resources Plan, including earthworks, discharges, stormwater management, wetland reclamation and works within and adjacent to waterbodies;

- resource consents under the National Environmental Standards for Freshwater 2020 ('NES-F') and National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 ('NES-CS');
- approvals relating to standard freshwater fisheries activities under the Freshwater Fisheries Regulations 1983; and,
- an archaeological authority that would otherwise be sought under the Heritage New Zealand Pouhere Taonga Act 2014.

The reasons for consent are addressed in **Section 9** of the application, with the detailed planning assessment provided in the *Statutory Assessment* in Appendix 2.

1.2 PROJECT BENEFITS

5. The Project will deliver significant economic, social and environmental benefits for Paraparaumu and the wider Kapiti Coast District. These include benefits that can be quantified in economic terms, together with broader benefits arising from increased housing supply, infrastructure investment, improved connectivity and environmental enhancement.

6. The key benefits of the Project include:

- a substantial increase in housing supply and choice, through the delivery of 593 new dwellings across a range of dwelling sizes and typologies within an accessible Metropolitan Centre location;
- significant investment and economic activity, including approximately $527.5million of development investment, substantial construction-related employment and GDP, and ongoing employment and economic activity associated with the retail and commercial components of the Project;
- the provision of approximately 20,000m² of LFR and 3,800m² of other retail and commercial activities, increasing the range of goods and services available within Paraparaumu, supporting the role of the Metropolitan Centre and helping to reduce retail expenditure leakage from the District;
- the efficient development of land already zoned and planned for Metropolitan Centre development, in a location that is largely 'infrastructure ready';
- delivery of the Town Centre Link Road and an integrated walking and cycling network, improving connectivity and permeability through the Site and between Kapiti Road, Ihakara Street, the existing town centre and surrounding areas;
- establishment of a new indigenous wetland complex and associated ecological restoration, forming a key component of the response to residual wetland effects and providing for improved wetland habitat and biodiversity outcomes, alongside complementary flood management and stormwater functions;
- enhancement of the Wharemaukū Stream corridor, including riparian restoration and habitat enhancement, as part of a wider integrated blue-green network; and,
- provision of an extensive network of open spaces, shared paths, walkways and cycle connections, improving recreational and active-mode opportunities and integrating the new development with the wider town centre and stream corridor.

7. Overall, the Project will enable substantial planned growth within the Paraparaumu Metropolitan Centre while delivering the housing, employment, commercial activity, infrastructure, connectivity and environmental improvements necessary to support that growth

1.3 SCOPE OF REFERRED PROJECT

8. On 18 September 2026, the Minister for Infrastructure accepted the referral application for New Central Park under Section 21(1)(c) of the Fast-track Approvals Act 2024 and referred the whole Project to the fast-track approvals process under section 26(2)(a).

9. Table 1 below compares the Project described in the referral decision with the development proposed in this substantive application.

TABLE 1: SCOPE ASSESSMENT

COMPONENT	SCOPE IDENTIFIED IN REFERRAL DECISION	SUBSTANTIVE APPLICATION	WITHIN SCOPE?
PROJECT LOCATION	77 and 109 Kapiti Road, approximately 8 ha of adjoining or nearby KCDC-owned land, and potential works on adjacent properties	Development of 77 and 109 Kapiti Road and 1 Brett Ambler Way, including KCDC-owned land and associated infrastructure works on adjoining properties.	Yes
RESIDENTIAL SUBDIVISION	Approximately 370–470 residential allotments, apartment allotments and associated access lots	The proposed subdivision provides for 370 allotments comprising 358 residential lots (Lots 1–358), five allotments for future residential unit title developments (Lots 401–405) and seven allotments for future mixed-use unit title developments (Lots 501–507), together with associated access arrangements.	Yes
RESIDENTIAL DEVELOPMENT	Approximately 520–620 residential units, including terraces, duplexes, standalone dwellings and apartments	A total of 593 residential units are proposed that comprise: • 219 apartments • 186 townhouses • 135 standalone houses • 32 duplexes • 21 courtyard houses	Yes
COMMERCIAL AND RETAIL DEVELOPMENT	Construction and operation of retail, commercial and service-based developments	Approximately 20,000m² of large format retail and 3,800m² of specialty retail and commercial activities, including drive-through activities	Yes
ROADING AND TRANSPORT	Road reserves, roads, parking, accessways, shared paths and associated infrastructure	Internal Link Road, intersections, accessways, pedestrian and cycle connections and associated transport infrastructure	Yes
THREE WATERS INFRASTRUCTURE	Stormwater, wastewater and potable water infrastructure	Infrastructure servicing, including network connections, upgrades and diversions	Yes
STORMWATER AND FLOOD MANAGEMENT	Stormwater management, flood detention and conveyance, including associated reserves	Stormwater treatment and conveyance, flood storage and associated infrastructure	Yes
EARTHWORKS	Earthworks associated with the development and infrastructure	Bulk earthworks, landform modification and associated construction works	Yes
WETLANDS	Works within and adjacent to natural inland wetlands, including reclamation, restoration, mitigation, offsetting and compensation	Reclamation of existing wetlands and establishment of an indigenous wetland compensation area	Yes
STREAMS	Works within and adjacent to streams, including reclamation, realignment, restoration and enhancement	Retention and enhancement of the Wharemaukū Stream, including riparian planting and in-stream habitat improvements	Yes

TABLE 1: SCOPE ASSESSMENT			
COMPONENT	SCOPE IDENTIFIED IN REFERRAL DECISION	SUBSTANTIVE APPLICATION	WITHIN SCOPE?
OPEN SPACE AND RESERVES	Public and private open spaces, reserves, shared paths and areas for wetland compensation and flood storage	Integrated open space network, wetland compensation area, flood management areas and pedestrian connections	Yes
OTHER ASSOCIATED ACTIVITIES	Infrastructure servicing and other ancillary activities associated with development	Associated construction, infrastructure, landscaping and environmental management activities	Yes

58. The comparison in Table 1 demonstrates that the activities and development proposed in this substantive application are consistent with the scope of the Project referred by the Minister. While the design has been further developed and refined since referral, the nature, scale and location of the proposed activities remain within the parameters of the referred Project.

1.4 STATUTORY CONTEXT AND ASSESSMENT

59. The Project is being considered under the Fast-track Approvals Act 2024 ('FTAA'). The FTAA provides the statutory framework for consideration of the Project and enables the various approvals required under other legislation to be sought and determined through an integrated process.

60. Section 81 and clause 17(1) of Schedule 5 establish the principal decision-making criteria for the resource consent approvals sought. Clause 17(1) requires the Panel to give the greatest weight to the purpose of the FTAA, being to facilitate the delivery of infrastructure and development projects with significant regional or national benefits, while also taking into account the relevant provisions of the RMA and other applicable legislation.

61. While the Project is determined under the FTAA rather than through the conventional RMA consenting process, the relevant national, regional and district planning instruments remain relevant to its assessment. The Project is aligned with the strategic direction of that planning framework, particularly the Metropolitan Centre Zone and associated Structure Plan, which anticipate comprehensive mixed-use development of the Site.

62. The statutory assessment identifies significant district and regional benefits arising from the Project, including the provision of 593 dwellings, approximately 23,800m² of retail and commercial floorspace, substantial investment and employment generation, the delivery of the Town Centre Link Road and supporting infrastructure, additional flood storage, ecological restoration and public open space. These benefits extend beyond the development itself and will support the continued growth and functioning of the Paraparaumu Metropolitan Centre and wider urban area.

63. The assessment also recognises that the Project will result in substantial changes to the existing environment. Adverse effects associated with the Project include the permanent reclamation of approximately 5.33ha of natural inland wetlands, the modification and removal of existing dune landforms, and associated ecological, landscape, natural character and cultural effects. The concerns raised by Te Ātiawa ki Whakarongotai, particularly in relation to dune removal and the Wharemaukū Stream, are acknowledged and remain the subject of ongoing engagement.

64. The Project has been developed through an iterative multidisciplinary design process, with particular consideration given to the practicability of avoiding and minimising effects on existing wetlands and dunes. The residual ecological effects of wetland loss are proposed to be addressed through biodiversity compensation, principally comprising the establishment of approximately 5.44ha of indigenous wetland habitat, together with stream enhancement, indigenous planting, monitoring and long-term management. The ecological assessment predicts no net loss of wetland extent and a net positive outcome for wetland biodiversity values, subject to successful implementation.

65. Other potential effects, including those associated with earthworks and construction, flooding and stormwater, transport, noise, geotechnical hazards, infrastructure servicing and archaeological values,

have been comprehensively assessed. The supporting technical assessments demonstrate that these effects can be appropriately managed through the design of the Project, the proposed mitigation measures, detailed design requirements and consent conditions.

66. The statutory assessment concludes that the Project is generally consistent with the relevant planning framework, while recognising particular policy tensions associated with wetland reclamation and dune modification. These matters have been addressed through the assessment of practicable avoidance options, the proposed environmental management measures and the consideration of the comprehensive urban development outcomes anticipated for the Site.

67. Section 85 of the FTAA establishes the circumstances in which an approval must or may be declined. Subject to the mandatory decline grounds in sections 85(1) and (2), section 85(3) provides that a Panel may decline an approval only where it is satisfied that one or more adverse impacts are sufficiently significant to be out of proportion to the Project's regional or national benefits.

68. Having regard to the nature and extent of the identified adverse impacts, the measures proposed to address those impacts, and the scale and longevity of the Project's district and regional benefits, it is considered that the adverse impacts are not sufficiently significant to be out of proportion to those benefits for the purposes of section 85(3).

69. Overall, the Project is considered to be consistent with the purpose of the FTAA and appropriately addresses the relevant statutory decision-making requirements. The comprehensive development of land already identified for Metropolitan Centre activities, together with the significant housing, economic, infrastructure and environmental benefits proposed, provides strong support for the Project under the FTAA decision-making framework.

2. INTRODUCTION

2.1 PURPOSE

70. This Substantive Application seeks the approvals necessary to enable the comprehensive development of New Central Park at 77 and 109 Kapiti Road and 1 Brett Ambler Way, Paraparaumu, together with associated works on adjoining land, under the Fast-track Approvals Act 2024 ('FTAA'). New Central Park Limited is the authorised person for the Project.

71. New Central Park is a comprehensive, masterplanned mixed-use development providing for the expansion of the Paraparaumu Metropolitan Centre. The Project integrates substantial residential development with large format retail ('LFR'), other retail and commercial activities, new transport and three waters infrastructure, and an extensive network of open space, ecological restoration and flood and stormwater management areas.

72. The Project has been developed as an integrated response to the planned urban role of the Site and its environmental and infrastructure context. In particular, the masterplan responds to the Wharemaukū Stream, existing natural inland wetlands and floodplain, while providing for the transport, infrastructure and open space networks necessary to support comprehensive development of the Site.

73. This application seeks all approvals required under the FTAA to authorise the construction, development and operation of the Project. The approvals sought are identified in Section 2.4, with the detailed reasons for resource consent and applicable activity status addressed in Section 9, and the archaeological approval is addressed in Part 2.

74. The purpose of this Substantive Application is therefore to provide the information and assessments required for the Panel to determine those approvals, including the assessment of the Project's environmental effects and other impacts, its regional and national benefits, the relevant statutory and planning framework, and the proposed measures and conditions for managing the effects of the Project.

2.2 PROJECT OVERVIEW

75. The Project provides for the subdivision, development and use of the Site for residential, LFR, retail, commercial and service activities. It includes new roads and transport connections, three waters infrastructure, and extensive areas of open space, wetland restoration, and ecological enhancement, and flood and stormwater management. The subdivision will create residential and commercial allotments and superlots, road reserves, open space and other allotments necessary to support the development.

76. The application also seeks authorisation for the future development and use of those allotments, including residential buildings and apartments, LFR buildings, other retail and commercial activities, associated car parking, loading, access, landscaping and signage, together with the infrastructure and open space network required to support the development.

77. The Project will be developed progressively in stages, enabling the coordinated delivery of housing, commercial development, infrastructure, transport connections and open space as part of a single integrated masterplanned development

2.3 PROJECT BACKGROUND

2.3.1 PREVIOUS FAST TRACK LISTING

78. The New Central Park project was originally advanced through a Fast-track referral application lodged in May 2024. This scheme sought to deliver an extension to the Paraparaumu Town Centre, comprising a broad mix of residential, commercial, large format retail, tourism and community activities. This included an anticipated yield of approximately 1,800 dwellings, alongside substantial supporting infrastructure such as new arterial roading, stormwater management systems, and the realignment and restoration of the Wharemaukū Stream. The proposal also incorporated the 'Whale Song' public art and tourism attraction, intended to contribute to regional identity, employment, and economic growth.

79. The masterplan included in the previous referral application is illustrated in **Figure 1** below.



FIGURE 1: MASTERPLAN PROVIDED WITH THE PREVIOUS REFERRAL APPLICATION

80. While the previous masterplanned scheme was subsequently listed in Schedule 2 of the FTAA, further detailed design following lodgement identified that the scale and yield anticipated by the initial proposal required reconsideration in light of infrastructure constraints, ecological considerations, and market realities.

81. In response, the developer has undertaken a comprehensive review of the project. This has involved retaining key technical inputs from engineering and ecological specialists, while reassessing the masterplan in light of a refined project vision. The revised approach has been grounded in delivering a more realistic and implementable outcome, informed by updated market demand, economic feasibility, and ongoing stakeholder engagement.

82. The resulting proposal seeks to maintain the core intent of the original development, namely, the delivery of a significant mixed-use town centre extension, while reconsidering the scale and composition of development. In particular, the revised scheme continues to provide for housing supply and ecological restoration and enhancement, alongside an increased retail offering. This includes both large-format retail responding directly to market interest, as well as complementary smaller-scale retail intended to support and activate the town centre environment.

2.3.2 STAGE 1 EARTHWORKS AND SUBDIVISION RESOURCE CONSENTS

83. Prior to the current fast-track process, the Applicant lodged resource consent applications with KCDC and GWRC for earthworks and subdivision associated with an earlier iteration of the Project.

84. Those applications were subject to technical review and requests for further information from both Councils before subsequently being withdrawn. The matters raised through that process have informed the development of the current Project and the technical assessments accompanying this Substantive Application.

85. In particular, the current Project has been developed as a comprehensive proposal encompassing the ultimate development and use of the Site, rather than being limited to the enabling earthworks and subdivision previously sought.

2.3.3 EVOLUTION OF THE WHAREMAUKŪ STREAM PROPOSAL

86. Earlier iterations of New Central Park proposed the partial reclamation and realignment of the Wharemaukū Stream through the proposed wetland and flood management area. That approach formed part of the previous earthworks and subdivision resource consent applications. Refer Figure 2 below that was included in the application.



FIGURE 2: PREVIOUS STREAM AND WETLAND CONCEPT PLAN

87. The Wharemaukū Stream (Te Manga o Wharemaukū) is recognised under the Greater Wellington Operative Natural Resources Plan (NRP) as having a number of significant values and classifications, including:

- Schedule B – Ngā Taonga Nui a Kiwa.
- Schedule C – Sites with Significant Mana Whenua Values, identified for Te Ātiawa ki Whakarongotai.
- Schedule F – Ecosystems and Habitats with Significant Indigenous Biodiversity Values, including threatened or at-risk fish habitat and migratory fish habitat (Schedule F1).
- Category 1 Surface Waterbody.
- River Class 6.

88. During the processing of those applications, KCDC and GWRC raised a range of technical matters relating to the proposed stream works. These resulted in extensive and repeated requests for further information, particularly in relation to sediment generation and management, the establishment and long-term stability of a new channel, flood conveyance, maintenance requirements, and the interaction between the stream and proposed wetland areas. The Natural Resources Plan also presents a significant constraint to reclamation, with reclamation of the Wharemaukū Stream, as a Schedule C waterbody, having prohibited activity status.

89. In response to those matters and further multidisciplinary design work, the current Project avoids reclamation and realignment of the Wharemaukū Stream and retains it generally within its existing alignment. Rather than simply retaining the existing watercourse, the Project provides for its ecological enhancement through indigenous riparian planting and habitat enhancement, with detailed design to be developed in consultation with mana whenua and the relevant technical specialists.

90. The *Interim Cultural Impact Assessment* prepared by Ātiawa ki Whakarongotai Charitable Trust acknowledges this change in approach, but seeks further consideration of opportunities to naturalise the Wharemaukū beyond its existing channelised alignment. In particular, the Trust states that *"the Fast Track process is one of few mechanisms to naturalise the channel of the Wharemauku to its historic alignment, prior to channelisation"* and wishes to discuss this further with the Applicant and Councils.

91. The CIA further acknowledges that such an approach presents additional ecological and hydrological challenges, but considers that, given the scale of the Project and significance of the Wharemaukū, opportunities for further naturalisation should continue to be discussed.

92. The Applicant acknowledges this position. However, having regard to the technical assessments, the matters raised by KCDC and GWRC, and the consenting constraint associated with reclamation of the Schedule C Wharemaukū Stream, the current Project has proceeded on the basis of retaining and enhancing the Stream within its existing alignment.

2.4 APPROVALS SOUGHT AND RELEVANT LEGISLATION

93. This application is made under the FTAA. It seeks the following approvals under section 42(4):

- Section 42(4)(a) – resource consents that would otherwise be applied for under the Resource Management Act 1991 (RMA), including subdivision, land use and regional resource consents; and
- Section 42(4)(i) – an archaeological authority that would otherwise be applied for under the Heritage New Zealand Pouhere Taonga Act 2014.

94. A wildlife approval is being progressed separately and will be applied for directly with the DOC once the proposed wildlife release site has been surveyed.

95. The Project includes standard freshwater fisheries activities, which are addressed as part of this application. No separate approval for a complex freshwater fisheries activity under section 42(4)(j) is sought.

2.5 FAST TRACK APPROVAL ACT PROCEDURAL REQUIREMENTS

2.5.1 PRE-LODGEMENT REQUIREMENTS

96. As a referred project, the Project is not required to repeat the section 11 referral-stage consultation and notification process prior to lodgement of this Substantive Application. That process was undertaken as part of the recent referral application, with formal notification provided to the relevant parties on 18 May 2026 and the statutory response period expiring on 16 June 2026.

97. The feedback received through the referral process has informed the preparation and refinement of the current Project. Engagement has also continued throughout preparation of this Substantive Application, including with KCDC, GWRC, mana whenua and other relevant stakeholders. This engagement and the matters raised are summarised in the *Consultation Summary Report* in Appendix 38.

SECTION 30 – IDENTIFICATION OF EXISTING RESOURCE CONSENTS

98. Section 30 of the FTAA applies where a substantive application for a listed or referred project seeks a resource consent and the authorised person does not hold an existing resource consent for the same activity using some or all of the same natural resource.

99. In accordance with Section 30(2), the Applicant provided written notice to GWRC on 9 September 2026 requesting identification of any existing resource consents of the kind described in section 30(3). GWRC provided its response on 23 September 2026, identifying a number of existing resource consents held by KCDC relating to stream works, stormwater infrastructure and water diversions within or near the Project area. GWRC's response is included in Appendix 39.

100. GWRC noted that the proposed works may affect structures or activities authorised by KCDC's existing consents and recommended engagement with KCDC as the existing consent holder.

101. No works are proposed to the existing culverts along the Wharemaukū Stream. These culverts will remain in place and continue to operate as they currently do. They are not identified as presenting impediments to fish passage, and no alterations are required as part of the Proposal.

102. The existing pipes and culverts located within the development Site are not identified as KCDC-owned infrastructure and are not understood to be the structures authorised under the existing KCDC resource consents identified by GWRC.

103. Irrespective of the precise relationship between these structures and the existing consents, the Applicant considers that the proposed works are not expected to prevent KCDC from continuing to exercise its existing resource consents or result in non-compliance with their conditions.

104. On this basis, the Applicant considers that the proposed works will not compromise KCDC's ability to continue exercising its existing resource consents. The requirements of Section 30 have therefore been satisfied.

2.5.2 SUBSTANTIVE APPLICATION REQUIREMENTS – SECTION 43

105. The Substantive Application complies with the requirements of section 43 of the FTAA, as demonstrated by the detailed assessment in Table 4 of this application. In particular, the application:

- is lodged in the form and manner approved by the Environmental Protection Authority;
- demonstrates that the Project is consistent with the purpose of the FTAA as a development project delivering significant regional benefits;

- does not involve any ineligible activities under section 5 of the FTAA;
- provides the information required for the resource consents and archaeological authority sought; and,
- contains the relevant information required by the FTAA for a Substantive Application, including the applicable information requirements under Schedules 5 and 8.

2.6 STRUCTURE OF THIS SUBSTANTIVE APPLICATION

106. This Substantive Application seeks the approvals identified in Section 1.4 above and has been prepared to address the information and assessment requirements of the FTAA applicable to each approval sought.

107. The remainder of this application is structured as follows:

- Part 1 addresses the resource consents that would otherwise be sought under the RMA, including the relevant District Plan, Natural Resources Plan and national environmental standard requirements, together with the standard freshwater fisheries activities addressed under Schedule 5, clause 9 of the FTAA;
- Part 2 addresses the archaeological authority that would otherwise be sought under the Heritage New Zealand Pouhere Taonga Act 2014.

108. The detailed reasons for each approval, applicable activity status, assessment of environmental effects, assessment against the relevant statutory and planning provisions, and proposed conditions are addressed in the relevant parts of this application and supporting technical assessments.

2.7 AUTHORISED PERSON MAY LODGE SUBSTANTIVE APPLICATION – SECTION 42

109. Section 42(1) of the FTAA provides that the authorised person for a referred project may lodge a substantive application with the Environmental Protection Authority ('EPA').

110. New Central Park Limited is the authorised person for the New Central Park Project and is therefore entitled to lodge this Substantive Application. The Project is a referred project following the Minister's decision to accept the Project for referral to the fast-track approvals process under section 21 of the FTAA.

111. In accordance with section 42(2), this Substantive Application has been prepared to comply with the requirements of section 43 of the FTAA. New Central Park Limited is also eligible to apply for the corresponding approvals under the relevant specified Acts, as required by section 42(3).

112. The approvals sought through this Substantive Application are those identified in Section 2.4 above. The information and assessments required in respect of each approval are addressed in the relevant parts of this application and the supporting technical assessments.

2.8 OWNERS AND OCCUPIERS OF ADJACENT SITES

113. In accordance with clause 5(1)(d) of Schedule 5 of the FTAA, the names and addresses of owners of the Site and adjacent land are set out in Appendix A of the Consultation Summary Report provided in Appendix 38.

114. Clause 5(1)(d)(ii) requires an application to include the full name and address of *"each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry".*

115. In early September 2026, letters were sent to the owners of all adjacent sites, including those on the opposite side of Kapiti Road and the Kapiti Expressway. The letter is attached to the *Consultation*

Summary Report and requested that landowners provide the contact details of any occupiers of their properties.

116. The Applicant considers that reasonable enquiries have been undertaken to identify occupiers of adjacent land. No additional occupiers have been identified through those enquiries beyond those whose details have already been provided. Accordingly, the requirement in clause 5(1)(d)(ii) has been met.

2.9 STATEMENT OF EXPERIENCE

117. The planning assessment and application documentation have been prepared by Stephanie Blick, with Ian Leary undertaking a technical peer review of the application documentation, including the statutory planning assessment and proposed consent conditions. Stephanie and Ian will both be involved in the processing of the Substantive Application, including responding to planning and statutory matters arising through the substantive application process and providing further planning input and advice as required.

2.9.1 STEPHANIE BLICK

118. This application has been prepared by Stephanie Blick, Director and Principal Planner at Scope Planning Limited. Stephanie is an experienced resource management planner and provides planning and consenting advice across a wide range of residential, commercial, infrastructure and large-scale urban development projects.

119. Stephanie has experience working within the Kapiti Coast District and a detailed understanding of the District's planning framework, growth context and consenting environment. She regularly acts for applicants on development projects within the District and has considerable experience engaging with Kapiti Coast District Council, Greater Wellington Regional Council, iwi and other stakeholders on complex resource management matters.

120. Stephanie also has significant direct experience with the fast-track consenting process. She acted as the planner for the applicants for the Ōtaki Māori Racing Club redevelopment, Plimmerton Farm Stage One, and Waikanae North (The Grange) fast-track consent applications under the COVID-19 Recovery (Fast-track Consenting) Act 2020. This included preparation and coordination of the substantive consent applications and supporting planning assessments, engagement with relevant councils and stakeholders, and involvement through the expert consenting panel processes.

121. Her wider experience includes the preparation and management of complex resource consent applications, statutory planning assessments, plan changes and policy matters, and the coordination of multidisciplinary technical teams for large-scale development projects. This experience includes particular expertise in residential and mixed-use development, urban growth, infrastructure, and freshwater and ecological planning matters.

122. Stephanie has been involved in the development and refinement of the current proposal, engagement with Kapiti Coast District Council, Greater Wellington Regional Council, iwi and other stakeholders, and the coordination of the technical assessments supporting this Substantive Application.

2.9.2 IAN LEARY

123. Ian has undertaken a technical peer review of the planning components of this Substantive Application, including the statutory assessment and proposed consent conditions, and will continue to provide planning input through the processing of the application.

124. Ian has experience and qualifications as a surveyor and planner, with over 30 years of work in land development and planning. His experience includes civil design of roading, services and earthworks. Ian holds certification as a hearing commissioner and has sat on numerous resource consent, plan change and designation hearings. He has also recently completed specialist training for fast-track commissioners and expert panel members.

125. Ian has considerable Environment and High Court experience as an expert planning witness. He has worked primarily in the Wellington Region, including the Kapiti Coast District Council area. He is also very familiar with the Greater Wellington Regional Council planning documents and processes, having prepared numerous applications for subdivision and land development projects.

126. Ian is a director of a multidisciplinary surveying, planning and engineering company and has a good understanding of the interrelationships between planning processes and land development design. He has also prepared an application for 61 Molesworth Street under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

2.9.3 CODE OF CONDUCT

127. While this application is not a matter before the Environment Court, Ms Blick and Mr Leary have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and have complied with that Code in relation to their respective contributions to this application.

128. The data, information, facts and assumptions Ms Blick has relied upon are identified in this application and the supporting technical assessments. The reasons for the opinions and conclusions Ms Blick has reached are also set out in this application.

129. Except where Ms Blick expressly states that she is relying on the advice or expertise of others, the matters addressed are within her area of expertise and she has not omitted to consider any material facts known to her that might alter or detract from the opinions expressed.

3. CONFIRMATION OF COMPLIANCE WITH S46(2) SCHED 5, CL5(1)(C)

130. This section is provided in accordance with Schedule 5 Clause 5(1)(c), which requires confirmation that the consent application complies with section 46(2)(a), (b), and (d).

> *(2) A Substantive Application complies with this subsection if—*
>
> *(a) the application complies with—*
>
> *(i) section 42; and*
>
> *(ii) sections 43 and 44; and*
>
> *(b) the application relates solely to a listed project or a referred project; and*
>
> *(c) the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and*
>
> *(d) any fee, charge, or levy payable under regulations in respect of the application is paid.*

131. These matters are addressed in turn below, starting with Section 42 in **Table 3** below.

TABLE 3: SECTION 42 FTAA ASSESSMENT

SUBSECTION	ASSESSMENT
(1) The authorised person for a listed project or a referred project may lodge with the EPA— (a) 1 Substantive Application for the project; or	The authorised person (New Central Park Limited) is lodging one Substantive Application for the project.

TABLE 3: SECTION 42 FTAA ASSESSMENT	
SUBSECTION	ASSESSMENT
(b) in the case of a referred project whose referral application was accepted under section 21(1)(a), 1 Substantive Application for each stage of the project.	
(2) A Substantive Application must— (a) comply with section 43; and (b) if there is more than 1 authorised person for the project, be lodged jointly by every authorised person who is the proposed holder of an approval.	The Substantive Application complies with section 43, as assessed in the following section. Subclause (b) is not applicable as there is one authorised person for the project.
(3) For each approval sought under subsection (4),— (a) the applicant must be eligible to apply for any corresponding approval under a specified Act; or (b) if the Substantive Application is lodged by more than 1 authorised person, the authorised person who is proposed to hold the approval sought under subsection (4) must be a person who would be eligible to apply for any corresponding approval under a specified Act.	the applicant is eligible to apply for the approvals under subsection (4). Subclause (b) is not applicable.
(4) A Substantive Application may seek 1 or more of the following matters (the approvals): (a) a resource consent that would otherwise be applied for under the Resource Management Act 1991 (but see subsection (5)): … (h) a wildlife approval as defined in clause 1 of Schedule 7: (i) an archaeological authority described in section 44(a) or (b) of the Heritage New Zealand Pouhere Taonga Act 2014 that would otherwise be applied for under that Act (but see subsection (9)): … (j) an approval or a dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity:	The Substantive Application is seeking approvals under the following subsections: Section 42(4)(a) – resource consent Section 42(4)(i) – archaeological authority A wildlife approval under section 42(4)(h) is being applied for separately and does not form part of this Substantive Application. The Project includes standard freshwater fisheries activities, but no separate approval for a complex freshwater fisheries activity under section 42(4)(j) is sought.
(5) A Substantive Application that seeks an approval described in subsection (4)(a)— (a) may seek that approval for an activity that is a prohibited activity under the Resource Management Act 1991: (b) must, if section 30(6) applies, be lodged within the time frame specified in that section.	Not applicable, no approvals are sought for prohibited activities under the RMA. The Substantive Application is being lodged within three months of GWRC's response dated 23 September 2026, consistent with the timeframe in section 30(6), to the extent that provision applies. GWRC's response is attached as **Appendix 39**.
(6) A Substantive Application may seek an approval described in subsection (4)(b) only if— (a) the Substantive Application also seeks an approval described in subsection (4)(a) or (d); and (b) the change or cancellation is material to the implementation or delivery of the project.	Not applicable, no approval under subsection (4)(b) is being sought
(7) A Substantive Application may seek an approval described in subsection (4)(c) only if the Substantive Application also seeks an approval described in subsection (4)(a) or (d).	Not applicable, no approval under subsection (4)(c) is being sought
(8) A Substantive Application that seeks an approval described in subsection (4)(f) must comply with section 35(9).	Not applicable, no approval under subsection (4)(f) is being sought
(9) A Substantive Application that seeks an approval described in subsection (4)(i)— (a) may be made only if the application also seeks an approval described in subsection (4)(a) or (d): (b) may include an application under clause 7 of Schedule 8 (application for approval of person to carry out activity).	The Substantive Application is also seeking an approval under subsection 4(a) so the application complies with this subsection. This application seeks approval for a person to carry out an activity under an archaeological authority Information required under clause 5 is provided in appendices 33-36.

TABLE 3: SECTION 42 FTAA ASSESSMENT	
SUBSECTION	ASSESSMENT
(10) A Substantive Application may seek an approval described in subsection (4)(l) if the applicant— …	Not applicable, no approval under subsection (4)(l) is being sought
(11) A Substantive Application may seek an approval described in subsection (4)(n) only if— …	Not applicable, no approval under subsection (4)(n) is being sought
(12) If a Substantive Application is lodged by more than 1 authorised person, the applicant for the purposes of subsections (10) and (11) is the person who is proposed to hold the approval described in subsection (4)(l) or (n), as the case may be.	Not applicable, there is only one authorised person applying
(13) If the authorised person has applied under section 39 for a determination under Section 23 or 24, the Substantive Application must comply with Section 39(5).	Not applicable, no determination is being sought under section 39

179. As shown in **Table 3** above, the application complies with Section 42 and therefore Section 46(2)(a)(i).

180. The relevant matters in Section 43 are addressed in **Table 4** below.

TABLE 4: SECTION 43 FTAA ASSESSMENT	
SUBSECTION	ASSESSMENT
(1)(a) must be lodged in the form and manner approved by the EPA; and	This application is lodged in the form and manner approved by the EPA.
(b) must— (i) explain how the project to which the application relates is consistent with the purpose of this Act; or (ii) for a project referred under section 21(1)(a)— (A) explain how both the stage to which the application relates and the whole project are consistent with the purpose of this Act; and (B) contain information relating to the likelihood that any later stages of the project will be completed; and	This application explains how the Project is consistent with the purpose of the FTAA in the relevant statutory assessment section and complies with (b)(i). Subparagraph (b)(ii) is not applicable as the Project was referred under section 21(1)(c), rather than section 21(1)(a).
(1)(c) must demonstrate that the project does not involve any ineligible activities; and	This application does not include any ineligible activities listed in section 5 of the FTAA as set out in **the bottom of this table.**
(1)(d) must, if the application is lodged by more than 1 authorised person, state the proposed approval to be held by each person; and	Not applicable, there is only one authorised person applying.
(1)(f) must, if the authorised person has applied under section 39 for a determination under section 23 or 24, include a copy of the notice under section 39(4); and	Not applicable, no determination is being sought under section 39.
(1)(g) must, if the application seeks an approval for an activity that is the subject of a determination under section 23, set out the steps taken to secure the agreement referred to in section 5(1)(a); and	Not applicable, no determination is being sought under section 39.
(1)(h) must state whether the application relates to a priority project and, if so, include confirmation that, to the best of the applicant's knowledge, there are no competing applications; and	Not applicable, the Minister has not determined that this is a priority project.
(1)(i) must be made by the deadline specified in the notice under section 28(3)(d); and	The Project is a referred project. This Substantive Application is being lodged within the deadline specified in the Minister's referral decision under section 28(3)(d).
(1)(j) must not lodge a Substantive Application unless any fee, charge, or levy payable under regulations in respect of the application is paid	All relevant fees, charges, or levies payable have been paid.

TABLE 4: SECTION 43 FTAA ASSESSMENT	
SUBSECTION	ASSESSMENT
(2) If a Substantive Application is for a listed project, it must also contain the information required by section 13(4) (other than section 13(4)(b), (f)(ii) and (iii), and (g) which applies— (a) as if the reference in section 13(4)(k) to section 11 were a reference to section 29; and (b) as if the reference in clause 2 of Schedule 11 to section 12(2) were a reference to section 29; and (c) with any other necessary modifications.	Not applicable. The current Project is a referred project under section 21(1)(c), rather than a listed project.
(3) The requirements referred to in subsection (1)(e)(ii) are those set out in— (a) for an approval described in section 42(4)(a) (resource consent), clauses 5 to 9 of Schedule 5: … (h) for an approval described in section 42(4)(h) (wildlife approval), clause 2 of Schedule 7: … (i) for an approval described in section 42(4)(i) (archaeological authority), clause 2 of Schedule 8: … (j) for an approval described in section 42(4)(j) (complex freshwater fisheries activity approval), clause 3 of Schedule 9:	The relevant requirements are those in section 43(3)(a) and (i). This application contains all the information required by clauses 5 to 9 of Schedule 5 and clause 2 of Schedule 8.
(4) The EPA must approve an application form for the purposes of this section and ensure that it is made available on an internet site administered by or on behalf of the EPA.	The application form has been completed through the EPA Portal.
MEANING OF INELIABLE ACTIVITY (SECTION 5) In this Act, Ineligible Activity means any of the following:	
(a) an activity that— (i) would occur on identified Māori land; and (ii) has not been agreed to in writing by the owners of the land or been subject to a determination under section 23:	The Project does not involve activities on identified Māori land. Not applicable.
(b) an activity that— (i) would occur in a customary marine title area; and (ii) has not been agreed to in writing by the customary marine title group:	The Project does not involve activities within a customary marine title area. Not applicable.
(c) an activity that— (i) would occur in a protected customary rights area; and (ii) would have a more than minor adverse effect on the exercise of the protected customary right; and (iii) has not been agreed to in writing by the protected customary rights group:	The Project does not involve activities within a protected customary rights area. Not applicable.
(d) an activity that would occur on either of the following classes of land: (i) Māori customary land: (ii) land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Maori Act 1993:	The Site does not include Māori customary land or land set apart as a Māori reservation. Not applicable.
(e) an aquaculture activity or an activity that is incompatible with aquaculture activities— (i) that would occur within an aquaculture settlement area declared under section 12 of the Maori Commercial Aquaculture Claims Settlement Act 2004 or an area reserved under another Treaty settlement for the aquaculture activities of a particular group; and (ii) for which the applicant who is proposed to hold an approval described in section 42(4)(a) (resource consent) is not authorised to apply for a coastal permit under the Resource Management Act 1991:	The Project does not involve aquaculture activities or activities within an aquaculture settlement area. Not applicable.
(f) an activity— (i) that would require an access arrangement under section 61 or 61B of the Crown Minerals Act 1991; and (ii) that— (A) could not be granted an access arrangement because of section 61(1A) of that Act; or	The Project does not involve activities requiring an access arrangement under the Crown Minerals Act 1991. Not applicable.

TABLE 4: SECTION 43 FTAA ASSESSMENT	
SUBSECTION	ASSESSMENT
(B) would occur in an area for which a permit cannot be granted under that Act:	
(g) an activity that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the Resource Management Act 1991:	The Project does not involve activities prevented by these provisions. Not applicable.
(h) an activity (other than an activity that would require an access arrangement under the Crown Minerals Act 1991) that— (i) would occur on land that is listed in Schedule 4; and (ii) has not been subject to a determination under section 24:	The Site does not include land listed in Schedule 4 of the FTAA. Not applicable.
(i) an activity that— (i) would occur on a national reserve held under the Reserves Act 1977; and (ii) requires approval under that Act; and (iii) has not been subject to a determination under section 24:	The Project involves land classified as local purpose reserve under the Reserves Act 1977. While such land may constitute public conservation land, local purpose reserves are not identified as ineligible land under Schedule 4 of the FTAA. Accordingly, the Project does not involve activities on land listed in Schedule 4, and this provision does not apply.
(j) an activity that— (i) would occur on a reserve held under the Reserves Act 1977 that is vested in someone other than the Crown or a local authority; and (ii) has not been agreed to in writing by the person or persons in whom the reserve is vested:	The Project includes works within local purpose reserves held under the Reserves Act 1977. These reserves are vested in KCDC, being a local authority. Accordingly, the Project does not involve activities on reserves vested in persons other than the Crown or a local authority. Not applicable.
(k) an activity that— (i) would occur on a reserve held under the Reserves Act 1977 that is managed by someone other than the Department of Conservation or a local authority; and (ii) has not been agreed to in writing by the person or persons responsible for managing it:	The Project does not involve activities on reserves managed by persons other than the Department of Conservation or a local authority. Not applicable.
(l) an activity that is— (i) a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act; or (ii) an activity that is described in section 15B of the Resource Management Act 1991 and is a prohibited activity under that Act or regulations made under it; or (iii) an activity that is prohibited by section 15C of the Resource Management Act 1991:	The Project does not involve activities prohibited under these provisions. Not applicable.
(m) a decommissioning-related activity (which is an activity described in section 38(3) or 38C(1) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012):	The Project does not involve decommissioning-related activities. Not applicable.
(n) an ORE infrastructure activity as defined in section 4 of the Offshore Renewable Energy Act 2026 (whether under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or the Resource Management Act 1991) unless the applicant is the holder of a current feasibility permit or commercial permit under the Offshore Renewable Energy Act 2026 in respect of the ORE generation infrastructure activities that comprise all or part of the development.	The Project does not involve offshore renewable energy infrastructure activities. Not applicable.

244. As shown in **Table 4** above, the application complies with section 43, including the requirement under section 43(1)(c) that the Project does not involve any ineligible activities under section 5 of the FTAA. With regard to section 44, the information required by section 43 has been provided in sufficient detail to satisfy the purpose for which it is required. Therefore, the proposal complies with section 46(2)(a)(ii).

245. Although section 43(2) does not apply to the Project as a referred project, **Table 5** below provides an assessment against the information requirements of section 13(4) for completeness, with references to the relevant sections of this Substantive Application and supporting appendices.

TABLE 5: INFORMATION REQUIRED BY SECTION 13(4)	
SUBSECTION	ASSESSMENT
(a) a description of the project and the activities it involves:	The project description is provided in **Section 7** of this Application.
(c) information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24):	A review of the Project against the ineligible activities is provided in **Section 3, Table 4** above.
(d) a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application:	See Section 6 for site description and map of the Project area.
(e) the anticipated commencement and completion dates for construction activities (where relevant)	Anticipated development staging is described in Section 7 and the Draft Development Programme in Appendix 4. Construction will be undertaken progressively, with timing dependent on the granting of approvals, infrastructure delivery and market demand.
(f) a statement of whether the project is planned to proceed in stages and, if so,— (i) an outline of the nature and timing of the stages; and … [Note that (ii) and (iii) are not relevant to the application]	The application seeks consent for the full development. Anticipated staging is outlined in Section 7, the Civil Infrastructure Report in **Appendix 13** and the Draft Development Programme in **Appendix 4**.
(g) a statement of whether a part of the project is proposed as an alternative project in itself and, if so,— (i) a description of that part of the project; and (ii) an explanation of how that part of the project meets the criteria in section 22:	The proposal as described in **Section 7** is for a single project with no alternative projects in itself.
(h) a description of the anticipated and known adverse effects of the project on the environment:	All potential adverse environmental effects are set out in **Section 11** of this application.
(i) a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991:	There are no prohibited activities proposed (refer *Statutory Assessment* in **Appendix 2** which sets out resource consents required).
(j) a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou: (vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:	This information is set out in **Section 3.1** of the *Consultation Summary Report* in **Appendix 38**.
(k) a summary of— (i) the consultation undertaken for the purposes of section 11 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	This information is set out in the *Consultation Summary Report* attached in **Appendix 38.**
(l) a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements:	This information is set out in the *Consultation Summary Report* attached in **Appendix 38**.

TABLE 5: INFORMATION REQUIRED BY SECTION 13(4)	
SUBSECTION	ASSESSMENT
(m) a description of any processes already undertaken under the Public Works Act 1981 in relation to the project:	Not applicable.
(n) a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019:	Not relevant as outlined in **Section 9.6** of the *Consultation Summary Report* in **Appendix 38**.
(s) a description of the applicant's legal interest (if any), or if the referral application is lodged by more than 1 person, the legal interest of any of those persons (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work:	Refer to the description of the Site and land ownership in Section 6, together with the Records of Title in Appendix 1. The Project will also involve works on KCDC-owned land, for which KCDC has provided landowner approval in its letter of support (**Appendix 40**).
(t) an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant:	This information is provided in **sections 9 and 10** of this application with a detailed assessment of the proposal against the District Plan, NES-CS, NRP and NES-F rules and standards provided in the *Statutory Assessment* in **Appendix 2**.
(u) whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application; (ii) if a decision has been made, the outcome of the decision and the reasons for it:	Earlier earthworks and subdivision resource consent applications were lodged with KCDC and GWRC and subsequently withdrawn. These are described in Section 2.3 of this application.
(v) a description of whether and how the project would be affected by climate change and natural hazards:	Natural hazards and climate change effects are addressed by **Section 11** of this Application and assessed in detail in the *Flood Risk Assessment* (**Appendix 15**) and the *Geotechnical Assessment Report* (**Appendix 21**).
(w) if the referral application is lodged by more than 1 person, a statement of each proposed approval to be held by each of those persons	Not applicable.
(x) a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the referral application is lodged by more than 1 person, any of those persons) under a specified Act:	There have been no such compliance or enforcement actions taken against the Applicant.
(y) if the proposed approvals include— (i) an approval described in section 42(4)(a) or (d) (resource consent or designation), the information specified in clause 2 of Schedule 5: … (vi) an approval described in section 42(4)(a) or (d) where the project includes a standard freshwater fisheries activity, or an approval described in section 42(4)(j) (complex freshwater fisheries activity approval), the information specified in clause 2 of Schedule 9:	The information required for the resource consents is provided in Part 1 of this application, including the assessment of environmental effects in **Section 11**, statutory assessments in **Section 12-14**, and supporting Statutory Assessment in Appendix 2. Existing resource consents identified under section 30 are addressed in **Sections 2.4, 9 and 10**, with GWRC's response provided in **Appendix 39**. The Project includes standard freshwater fisheries activities associated with the installation and modification of culverts. No separate complex freshwater fisheries approval is sought under section 42(4)(j). The relevant freshwater fisheries information, including proposed in-stream structures and fish passage considerations, is addressed in **Section 10** of this application and the supporting ecological assessments in **Appendices 27 and 29**.

299. As shown in **Table 5** above, the application complies with the relevant subsections of section 13(4).

300. With regard to Section 46(2)(c), any fee, charge, or levy payable under regulations in respect of the application has been paid.

4. PLANNING CONTEXT

4.1 KAPITI COAST OPERATIVE DISTRICT PLAN

301. The Project Site is located in the Metropolitan Centre Zone and Natural Open Space Zone as illustrated in **Figure 3** below.



FIGURE 3: DISTRICT PLAN ZONING

302. The Site zoning, overlays and notations are set out in **Table 6** below.

TABLE 6: KAPITI DISTRICT PLAN ZONES, OVERLAYS AND NOTATIONS

PLANNING LAYER	DETAILS
Zones	Metropolitan Centre Zone Natural Open Space (Lot 7 DP 342714 and Lot 13 DP 361734)
Precinct	Metropolitan Zone Precinct C (PREC30) and subject to the Metropolitan Centre Zone Structure Plan (Appendix 19)
Designations	NZTA-005 - State Highway Purposes - MacKays to Peka Peka Expressway KCDC-031 – Plantation Reserves
Overlays	Coastal Environment Airport Plan: Runways Height Surfaces (Grass Runway 12/30 Take-off Approach)
Hazards	Flood Hazard – Ponding Flood Hazard – Storage Flood Hazard – Stream Corridor Flood Hazard – Overflow Path
Road Hierarchy	Kapiti Road - Major Community Connector Rimu Road - Centres Route Ihakara Street - Major Community Connector Iver Trask Place - Neighbourhood Access Route

315. The Site also falls within the Metropolitan Centre Zone Structure Plan as included in **Figure 4** below.

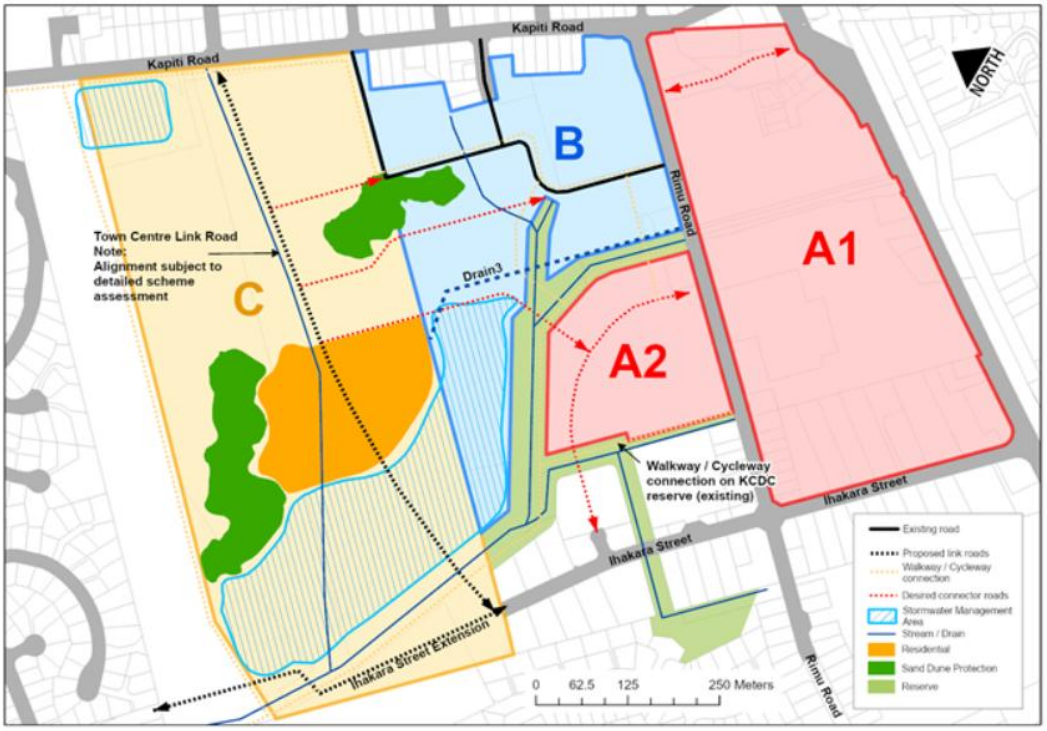


FIGURE 4: METROPOLITAN CENTRE ZONE STRUCTURE PLAN

316. As set out in Appendix 19 of the District Plan, the purpose of the Structure Plan is to:

> *"plan for an integrated Metropolitan Centre Zone within the Paraparaumu Sub-Regional Centre. The Structure Plan, in conjunction with the District Plan policies and rules, sets out the land use activities, transport network, public open space network and stormwater management for the Metropolitan Centre Zone."*

317. The focus of the Structure Plan is to provide strategic planning to achieve the following:

- Retail and commercial areas being located where these activate the following roads/streets:
  - existing State Highway One (Main Road);
  - Rimu Road;
  - the desired connector roads in Precinct A;
- Strengthen the role and function of the existing retail and commercial core (Precinct A) to better provide for the community's retail, social and commercial needs;
- Provide for residential activities to encourage medium density residential development to occur close to the town centre;
- Clustered community facilities (in Precinct B);
- Provide for commercial, limited retail and residential activities (in Precinct C);
- Provide for a large consolidated stormwater management area and if practicable, wetland to provide for ecological and amenity values;
- Recreational opportunities along the Wharemaukū Stream, Drain 3, other stormwater management and wetland areas, and in Precinct B;

- Increased connectivity (the road, cycle and walkway network) throughout the area which does not impede proposed link roads and desired connector roads shown on the Structure Plan; and,

- A link road between the Kapiti Road/Arawhata Road intersection and the Ihakara Street extension that provides a strategic east-west transport and freight connection, alleviates traffic issues on Kapiti Road, and enables connections to desired connector roads.

4.1.1 DESIGNATIONS

318. As noted above, two designations fall over the site. Refer **Figure 5** below for the extents of the NZTA and KCDC designations.



FIGURE 5: NZTA AND KCDC DESIGNATION EXTENTS

NZTA-005 – MACKAYS TO PEKA PEKA EXPRESSWAY

319. Designation NZTA-005 provides for the MacKays to Peka Peka Expressway, with NZTA being the requiring authority.

320. The designation extends beyond the constructed Expressway corridor and overlaps with portions of the western part of the Site, including areas proposed for the wetland complex and western Large Format Retail development.

321. The Applicant has been engaging with NZTA regarding the extent of the designation. NZTA has indicated that the designation boundaries are expected to be reviewed and reduced in the future, as there does not appear to be an ongoing requirement to retain the areas extending into the Site for State Highway purposes.

4.1.2 KCDC-031 – PLANTATION RESERVES

322. Designation KCDC-031 is held by KCDC for Plantation Reserves purposes. It generally extends along the Wharemaukū Stream corridor within the Site.

323. KCDC has provided landowner approval for the proposed development, including works affecting Council-owned land.

4.2 NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION

324. The Wharemaukū Stream (Te Manga o Wharemaukū) is recognised under the Greater Wellington Operative Natural Resources Plan ('NRP') as having the following scheduled values:

- Schedule B Ngā Taonga Nui a Kiwa
- Schedule C Sites with Significant Mana Whenua Values
  - Te Ātiawa ki Whakarongotai.
- Schedule F Ecosystems and Habitats with Significant Indigenous Biodiversity Values
  - Threatened or at risk fish habitat (Schedule F1)
  - Migratory fish habitat (Schedule F1)
- Category 1 Surface Waterbody
- River Class 6

4.3 TE TUPU PAI – GROWING WELL (CENTRAL PARAPARAUMU)

325. Te Tupu Pai – Growing Well is KCDC's long-term growth strategy, which sets out how and where growth is to be accommodated across the district. It provides a strategic framework to manage population growth, housing demand, and urban development over time, with a clear focus on achieving a more compact, efficient, and sustainable urban form by directing growth to appropriate locations supported by infrastructure and services.

326. Within this framework, Central Paraparaumu is identified as the primary centre for the Kapiti Coast District, intended to develop over time into a city centre that provides the scale, facilities, and diversity of activities expected of a metropolitan hub. Refer Figure 6 below.

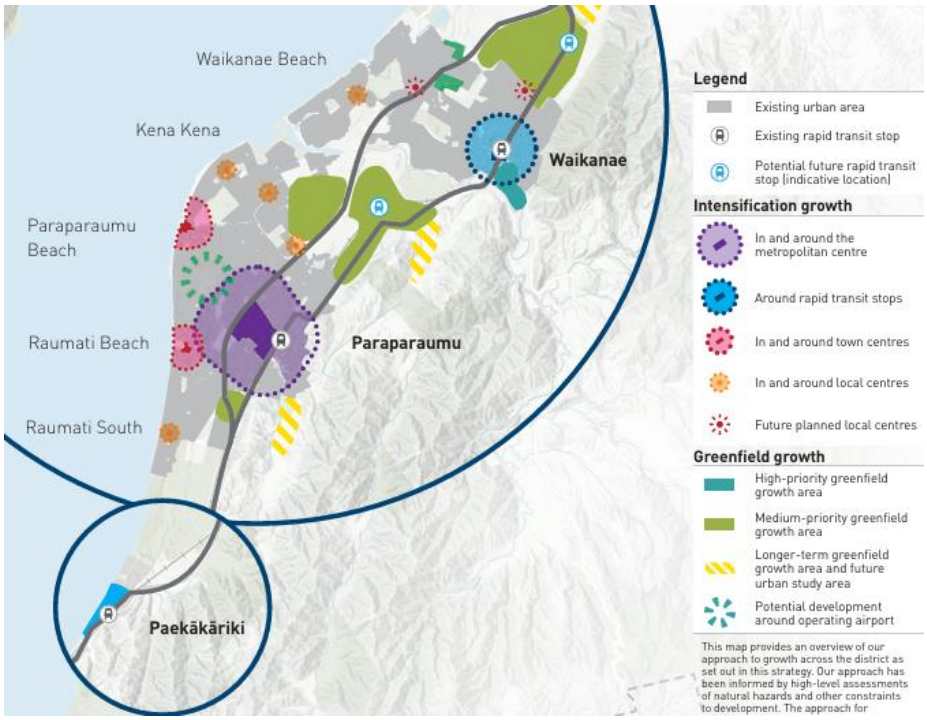


FIGURE 6: GROWTH STRATEGY MAP

327. KCDC's comments on the proposal at the referral stage reinforce the strategic importance of the Site within this growth framework. KCDC identified the Site as being in a key location for future growth, intensification and investment and recognised it as one of the most significant remaining development opportunities within the District. In particular, KCDC noted the opportunity presented by the Site's Metropolitan Centre zoning and location to accommodate substantial residential and commercial development, increase housing supply and choice, support a more compact urban form, and strengthen Central Paraparaumu as the District's primary centre. KCDC also identified opportunities to further increase residential yield and development intensity in order to make efficient use of the Site and supporting infrastructure and maximise the benefits of development in this strategically important location.[1]

4.4 RESOURCE MANAGEMENT REFORM

328. The Government has recently enacted the Planning Act 2026 and Natural Environment Act 2026, which will progressively replace the RMA and establish a new resource management system. The transition to the new system will occur over several years, with the RMA continuing to apply during the transitional period, subject to amendments introduced in stages.

329. The first substantive package of transitional consenting amendments will commence on 30 October 2026. These include new procedural principles under section 18B of the RMA, amendments to section 104 concerning matters excluded from consideration when assessing certain resource consent applications, and changes to notification provisions, including removal of the special circumstances test for public notification.

330. The Proposal is being advanced as a substantive application under the FTAA. The transitional provisions introduced through the Planning Act 2026 include specific arrangements for applications under the FTAA. In particular, clause 19 of Part 3 of Schedule 1 of the FTAA provides transitional arrangements for substantive applications seeking approvals under section 42(4)(a)–(d) that are lodged before commencement of the transition period. These applications must continue to be processed and determined under the FTAA and, in relation to the RMA, as those Acts were in force at the time the application was made.[2]

331. The transition period commences on 30 October 2026, being one month after the Planning Act 2026 received Royal assent.[3] On the basis that this Substantive Application is lodged before 30 October 2026, the transitional provisions preserve the statutory framework applicable to the resource consent approvals at the time of lodgement.

332. Accordingly, while the forthcoming changes to the resource management system are acknowledged, the transitional consenting amendments do not alter the statutory assessment framework adopted for this application.

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[1] Kapiti Coast District Council, Comments on New Central Park referral application, provided under the Fast-track Approvals Act 2024, contained in Combined Comments published by the Ministry for the Environment / Fast-track, 2026 https://www.fasttrack.govt.nz/__data/assets/pdf_file/0018/34812/Combined-comments.pdf?utm_source=chatgpt.com

[2] Planning Act 2026, Schedule 12, Part 3, inserting clause 19 into Part 3 of Schedule 1 of the Fast-track Approvals Act 2024, Substantive applications lodged before transition period. https://www.legislation.govt.nz/act/public/2026/70/en/latest/sections/LMS1628350/

[3] Planning Act 2026, section 2(2) and Schedule 1, clause 3(1). https://www.legislation.govt.nz/act/public/2026/70/en/latest/

PART 1

SUBSTANTIVE APPLICATION FOR RESOURCE CONSENTS UNDER THE RMA

5. INTRODUCTION

333. Part 1 of this Substantive Application addresses the resource consents sought under Section 42(4)(a) of the FTAA to authorise the subdivision, development, construction and operation of the New Central Park Project.

334. Section 43 of the FTAA sets out the requirements for a Substantive Application. In relation to the resource consents sought, Schedule 5 of the FTAA specifies the additional information and assessments required.

335. Accordingly, Part 1 provides the information and assessments relevant to the resource consent component of the Substantive Application and is structured as follows:

- **Section 6 – Site Description:** Schedule 5, clause 5(1)(b), including the location, legal description, ownership and surrounding environment.
- **Section 7 – Description of the Proposed Activity:** Schedule 5, clauses 5(1)(a) and (e), including the proposed subdivision, land use activities, earthworks, buildings, infrastructure and associated works.
- **Section 8 – Proposed Conditions:** Schedule 5, clause 5(1)(k).
- **Section 9 – Resource Consents Required:** Schedule 5, clauses 5(3) and 5(5), identifying the applicable district and regional rules, national environmental standards and activity status. This section also addresses other resource consents for the Project under Schedule 5, clauses 5(1)(f) and (l).
- **Section 10 – Freshwater Fisheries Approvals:** Schedule 5, clause 9, addressing the standard freshwater fisheries activities associated with the proposed culvert works.
- **Section 13 – Assessment of Environmental Effects:** Schedule 5, clauses 5(4), 6 and 7.
- **Section 11 – RMA Part 2 Assessment:** Schedule 5, clause 5(1)(g).
- **Section 12 – Assessment Against RMA Planning Documents:** Schedule 5, clauses 5(1)(h), 5(2) and 5(3).
- **Section 14 – Statutory Assessment:** Assessment against the applicable statutory decision-making criteria under the FTAA and RMA.
- **Section 15 – Conclusion:** Summary of the resource consent assessment and conclusions.

336. It is noted that:

- Schedule 5 Clause 5(1)(j) is not relevant as the project is not in the coastal marine area;
- Schedule 5 Clause 5(6) is not relevant as the land is not in Māori ownership; and
- Schedule 5 Clause 5(7) is not relevant as there is only one authorised person lodging the application.

6. SITE DESCRIPTION – SCHED 5, CL5(1)(B)

337. This section provides a description of the site and surrounding area in accordance with Schedule 5, Clause (5)(1)(b) and (d) of the FTAA.

338. In relation to Schedule 5 Clause (5)(1)(b), note that the site is not within or adjacent to a statutory area, ngā rohe moana o ngā hapū o Ngāti Porou, or a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.

6.1 MAP OF THE SITE

339. In accordance with Clause 5(1)(b) of Schedule 5 of the FTAA, **Figure 8** below provides a map of the site at which the activity is to occur:



FIGURE 7: MAP OF APPLICATION SITE

6.1.1 LEGAL DESCRIPTION AND TITLES

340. New Central Park Limited owns the majority of the Site. As noted, it is a related entity to, and the development vehicle of, The Wellington Company Limited.

341. New Central Park Limited has support from, and commercial arrangements with KCDC to facilitate the delivery of the project. Agreements in place, or currently being progressed, relate to the delivery of the proposed Town Centre Link Road, and Iver Trask extension. These agreements will also provide for the use of KCDC land, as illustrated on the masterplan, for flood storage and wetland offsetting required to support the delivery of this infrastructure.

342. A list of the properties on which works will occur to deliver the Project is provided in **Table 7** below. The Records of Title for these properties are provided in **Appendix 1**.

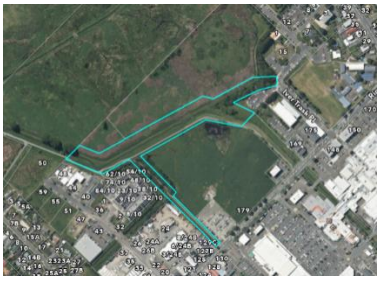
TABLE 7: PROJECT SITE ALLOTMENT DETAILS						
ADDRESS	TITLE & LEGAL DESCRIPTION	AREA	RELEVANT INTERESTS	OWNER	PROPOSED WORKS	PARCEL
109 Kapiti Road	822629 – Section 4 SO 501569	10.4344ha	—	New Central Park Limited	Primary development site *Referral App Ref: Table 1 'project site'*	
77 Kapiti Road (as per address on KCDC Property maps)	822686 – Section 3 SO 501569	17.5925ha	Proclamation 10183039.1 – right (in gross) to drain stormwater over part marked B on SO 501569 in favour of Her Majesty the Queen	New Central Park Limited	Primary development site *Referral App Ref: Table 1 'project site'*	
Addresses vary Sec 1: 175 Rimu Road Sec 2: 1 Brett Ambler Way & 15 Ngahina Street Sec 3: 10 Brett Ambler Way & 12 Ngahina Street Sec 4: 7 Ngahina Street	1068482 - PT SECS 1-4 SO 570550	8.0079ha (total)	Easement Instrument 9714653.3 (right of way)	KCDC	Reshaping and planting as part of wetland / flood storage area. Proposed road and pedestrian connections *Referral App Ref: Table 1 'project site'*	
	636810 – Lot 4 DP 470759	2.809 ha	Subject to the Reserves Act 1977 (Local Purpose Reserve – Drainage); Easement Instrument 9714653.3 (right of way)	KCDC	Reshaping and planting as part of wetland / flood storage area. Road connection crossing. Services connections *Referral App Ref: Table 1 'project site'*	

TABLE 7: PROJECT SITE ALLOTMENT DETAILS						
ADDRESS	TITLE & LEGAL DESCRIPTION	AREA	RELEVANT INTERESTS	OWNER	PROPOSED WORKS	PARCEL
Kapiti Road (road reserve strip)	822685 and 822628 Sections 1 and 2 SO 501569	Sec 1: 2,227m^2 Sec 2: 193m^2		KCDC	Minor physical works *Referral App Ref: Table 2 'other properties where works may be required'*	
Ihakara Street (drainage channel)	175334 Lot 6 DP 342714	2,058m^2		KCDC	Minor physical works *Referral App Ref: Table 2 'other properties where works may be required'*	
Ihakara Street (drainage channel)	175335 and 265124 Lot 7 DP 342714 and Lot 13 DP 361734	Lot 7: 5,615m^2 Lot 13: 1,310m^2	Subject to the Reserves Act 1977 (Local Purpose Reserve – Drainage); Easement	KCDC	Minor physical *Referral App Ref: Table 2 'other properties where works may be required'*	 

In addition to the above, some minor infrastructure trenching works are proposed on NZTA land adjoining the Site as per **Figure 8** below.



FIGURE 8: NZTA LAND WHERE SERVICING WORKS ARE PROPOSED

This allotment was identified in Table 2 of the Referral Application as 'Other Properties Where Physical Works May Be Required'. This allotment is therefore included in the Application Site and the Record of Title included in Appendix 1. The works involve trenching associated with the relocation of an existing wastewater main directly next to the existing path that will then be reinstated. See Figure xx below.

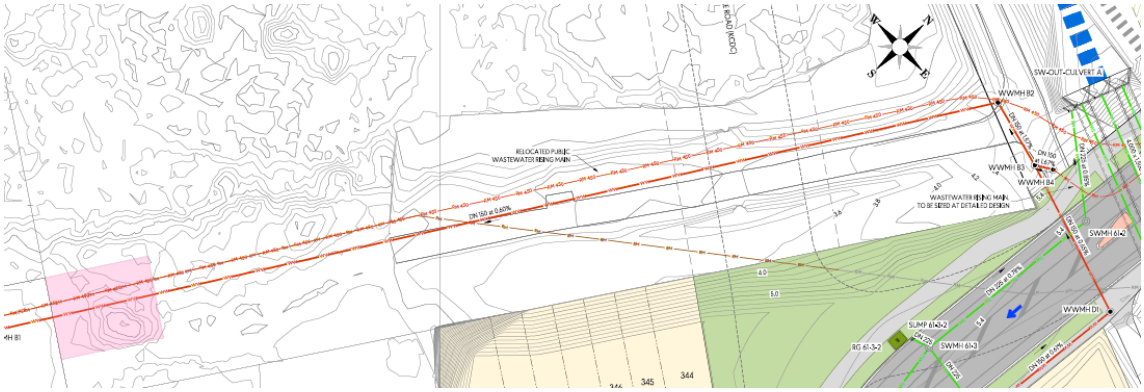


FIGURE 9: PROPOSED INFRASTRUCTURE WORKS ON NZTA LAND

The works are located within the Kapiti Expressway designation but are well removed from the Expressway itself and are not anticipated to prevent or hinder the designated purpose. This is consistent with discussions undertaken with NZTA regarding the proposed works and the extent of the designation.

It is noted that there is an alternative wastewater main alignment is available through adjoining KCDC-owned land, which is also included within the Application Site. This provides flexibility to deliver the required wastewater infrastructure.

6.1.2 FULL LIST OF APPLICATION SITE TITLES

408. Based on the above, the Application Site comprises:

- 109 Kapiti Road – Section 4 SO 501569 (RT 822629).
- 77 Kapiti Road – Section 3 SO 501569 (RT 822686).
- KCDC-owned land at Rimu Road, Brett Ambler Way and Ngahina Street (collectively '1 Brett Ambler Way') – Parts of Sections 1–4 SO 570550 (RT 1068482).

- KCDC-owned drainage reserve – Lot 4 DP 470759 (RT 636810).
- Kapiti Road road reserve strip – Sections 1 and 2 SO 501569 (RTs 822685 and 822628).
- Ihakara Street drainage channel – Lot 6 DP 342714 (RT 175334).
- Ihakara Street drainage channel – Lot 7 DP 342714 and Lot 13 DP 361734 (RTs 175335 and 265124).
- NZTA-owned land associated with the Kapiti Expressway – Section 1 SO 470914.

PUBLIC CONSERVATION LAND

409. Through the pre-lodgement notification process, DOC identified the following properties that are local purpose reserves:

- Lot 4 Deposited Plan 470759;
- Lot 7 Deposited Plan 342714;
- Lot 13 Deposited Plan 361734

410. As set out in the table above, these properties are Local Purpose Reserves owned by Kapiti Coast District Council. As such, they are subject to the Reserves Act 1977 and therefore fall under the definition of 'public conservation land' under the FTAA. Refer definition as follows:

> *public conservation land means land to which either or both of the following apply:*
>
> *(a) the land is held, managed, or administered under the Conservation Act 1987, the National Parks Act 1980, the Reserves Act 1977, or the Wildlife Act 1953:*
>
> *(b) the land is listed in Schedule 4*

411. The proposed works within the reserve parcels are limited to three waters and utility piping and connections, associated earthworks, and some minor path upgrades.

6.1.3 LAND INCLUDED IN PREVIOUS MASTERPLAN PROPOSALS

412. Previous masterplans to develop the Site have included the 'Ngāhina Block', being a small parcel of land adjoining the Wharemaukū Stream and KCDC-owned land. The Ngāhina Block is held within the same Record of Title as a larger parcel of land addressed as 179 Rimu Road, with the two parcels physically separated by the Wharemaukū Stream and existing shared path. See **Figure 10** below illustrating the small land parcel adjoining the stream.



FIGURE 10: NGAHINA BLOCK LAND ADJACENT TO APPLICATION SITE

413. However, NCPL has elected to progress the current application on the basis of land within its ownership, together with adjoining KCDC-owned land, to ensure the proposal can proceed independently without reliance on further landowner agreements, land transfers or other third-party arrangements.

414. Accordingly, the Ngāhina Block has been excluded from the Application Site, with the proposal designed to accommodate its continued separate ownership and use. In particular, the proposed flood management works have been designed to ensure that flooding effects on the Ngāhina Block are not increased and the existing access maintained via the right of way over KCDC-owned land.

415. The Project is therefore able to proceed independently of any future arrangements involving the Ngāhina Block. Notwithstanding this, NCPL may separately progress discussions with the landowners regarding opportunities for its future integration with the wider development. Any such arrangements would be progressed separately and are not necessary for the implementation of the Project as currently proposed.

6.1.4 SITE ACCESS

416. The existing transport environment and access arrangements for the Site are described in detail in Section 3 of the *Integrated Transport Assessment*, prepared by Stantec and provided in **Appendix 22.**

417. The Site is currently largely undeveloped and does not contain an established internal public road network. It is bounded by Kapiti Road to the north, Ihakara Street to the south, and Brett Ambler Way / Iver Trask Place to the east, with the Kapiti Expressway forming the western boundary.

418. Kapiti Road provides access along the northern side of the Site and is classified as a Major Community Connector. Of particular relevance to the future development of the Site, the existing signalised Kapiti Road/Arawhata Road intersection has provision for a fourth leg extending south into the Site.

419. To the south, Ihakara Street currently extends west from Rimu Road and terminates immediately adjacent to the Site. To the east, Iver Trask Place and Brett Ambler Way form part of the existing local road network adjoining the Site and provide connections through to Rimu Road and Kapiti Road.

420. Existing pedestrian and cycling connections are also available around and through the Site, including the Wharemaukū Stream track, Kapiti Road shared path and shared path adjoining the Kapiti Expressway, which connect with the wider town centre and active-mode network. These existing transport connections and the surrounding road network are described further in Sections 3.1 and 3.3 of the *Integrated Transport Assessment*.

6.1.5 SITE INFRASTRUCTURE SERVICING

421. Existing infrastructure servicing the Site is detailed in the *Civil Infrastructure Report* provided in **Appendix 13** and is summarised as follows:

- **Wastewater:** There is an existing 450mm asbestos cement rising wastewater main which runs through the centre of the site at a shallow depth. The rising main runs from the Rata Road pump station southwest of the site and provides a direct connection to the wastewater treatment plant.
- **Water Supply:** There are existing water mains at various locations around the site, which provide a range of connection points which can be utilised to provide redundancy for the proposed development. These include 350mm ID water mains on Rimu Road and Kapiti Road, 150mm ID water mains on Ihakara Road and Iver Trask Place and a 100mm water main on Brett Ambler Way.
- **Stormwater:** There is no established reticulated stormwater pipe network servicing the majority of the Site. Existing stormwater drainage is primarily provided through a series of open artificial drains and drainage channels, which convey surface water runoff through the Site
- **Utilities:** Telecommunications, power and gas networks are available adjacent to the site.

6.1.6 SITE ECOLOGY

422. Bioresearches have been involved in this development since the land was purchased by New Central Park Limited in 2022. This has included undertaking detailed site assessments that culminated in the preparation of an Ecological Assessment and other reports to support the KCDC and GWRC consent applications. As a result, there is already a well-established and robust understanding of the ecological values present across the Site. A significant body of ecological reporting has therefore already been completed, which provides a strong foundation for this application.

423. As further described in sections 2 and 3 of the *Assessment of Ecological Effects* in **Appendix 27**, the ecological values of the Site have been assessed, including assessments of terrestrial habitats, avifauna, lizards, bats, and freshwater habitats. Assessments of existing ecological values were a combination of desktop analysis and on-site field assessments.

424. A desktop review of various online GIS databases was undertaken to determine the extent of ecological protection overlays (e.g., covenants, conservation land, SNAs), 'ecosystem type' classifications, and visualise historical land-use using historical aerial images. Previous ecological reports for the site and faunal databases (including Department of Conservation BIOweb for lizards and bats, iNaturalist, eBird, NZ fish database, eDNA databases) were reviewed.

425. In addition, the Kaitiakitanga Plan for Te Ātiawa Ki Whakarongotai, Ātiawa Ki Whakarongotai Whakarongotai te moana Whakarongotai o te wa, was read and acknowledged prior to the field investigations.

426. Freshwater assessments included the desktop reviews, and on-site ecological valuations and classification of aquatic habitats. Overland flow paths were ground-truthed and classified as to their permanent, intermittent or ephemeral status in accordance with Greater Wellington Regional Council 2021 Guidance. In addition, these watercourses were assessed as to whether they were natural or artificial, using information from both the desktop re-view and site visits. Stream Ecological Valuations (SEVs) were undertaken on representative reaches of the streams. During this initial assessment work engagement was undertaken (including site visits) with both KCDC and GWRC advisors and Te Ātiawa.

427. Potential wetland areas were assessed following the MfE wetland delineation protocols, including vegetation assessments and wetland hydrology to determine whether the areas meet the definition of a 'natural inland wetland' under the National Policy Statement for Freshwater Management ('NPS-FM').

428. The assessment work culminated into the completion of the following reports:

- Bioresearches (2023a) Memorandum: 77 Kapiti Road – Remediation. Memo to The Wellington Company. 19 November 2023. 1 pg.

- Bioresearches (2023b) Memorandum: Kapiti Development Proposed Wetland Hydrology. Memorandum to The Wellington Company. 14 December 2023 4pp.
- Bioresearches (2023b) 77-109 Kapiti Road, Paraparaumu Stream and Wetland Loss Offset Report December 2023. V3 dated 14 December 2023. 47 pp.
- Bioresearches (2024) Memorandum: 77 – 109 Kapiti Road, Paraparaumu S92 Response. Memorandum to The Wellington Company. 11 June 2024. 14 pp.
- Bioresearches (2025a) Memorandum: Bat Survey Dec 2024 – Jan 2025: 77 – 109 Kapiti Road, Paraparaumu. Memorandum to The Wellington Company. 15 April 2025. 6pp.
- Bioresearches (2025b) Memorandum: Lizard Survey April 2025: 77 – 109 Kapiti Road, Paraparaumu. Memorandum to The Wellington Company. 1 May 2025. 5pp.
- Bioresearches (2025c) 77-109 Kapiti Road, Paraparaumu Assessment of Ecological Effects. Report for The Wellington Company. Version 6 Dated 27 May 2025. 95pp.

429. The identified and assessed ecological values of the Site are set out in the *Ecological Effects Assessment* that consolidates the information included in the above reports and is summarised in the following sections.

TERRESTRIAL HABITATS

430. As further described in Section 5 of the *Assessment of Ecological Effects,* terrestrial vegetation units identified onsite can be categorised in to two categories, being exotic grassland and exotic shrubland dominated by either gorse and/or blackberry. Refer **Figure 11** below.

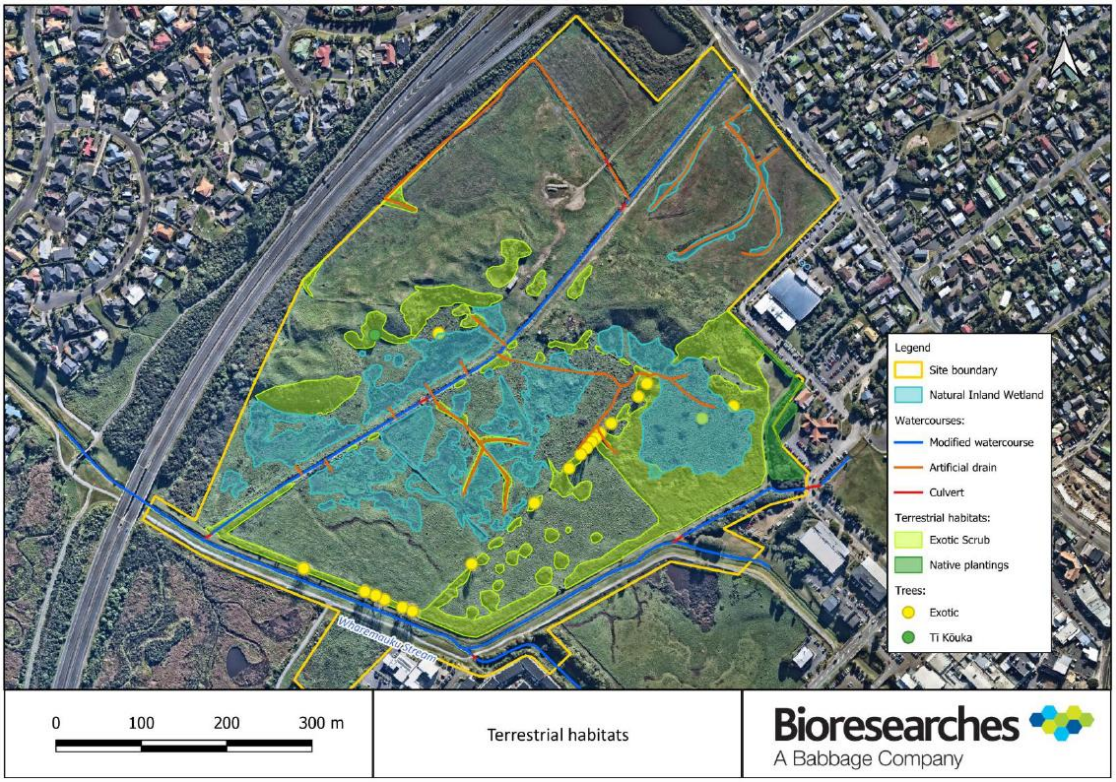


FIGURE 11: TERRESTRIAL VEGETATION TYPES IDENTIFIED WITHIN THE SITE (Source: Ecology Assessment)

431. Areas of exotic grassland are summarised as follows:

- The exotic grassland comprises common exotic pasture species, including ryegrass, white clover, dock, yarrow and cocksfoot.
- Much of the grassland has been recently grazed and/or mown, resulting in relatively limited vegetation biomass across this habitat.
- The grassland is not representative of a naturally occurring habitat type and contains no, or very few, native plant species.
- As a result, the exotic grassland is assessed as having Negligible botanical value.
- In its current mown and grazed state, the grassland provides very limited habitat value for native fauna, although it may occasionally be used by birds such as pūkeko for nesting or foraging.
- While the grassland could potentially provide habitat for New Zealand dotterel (Threatened – Nationally Increasing), the likelihood of its use is considered very low and the species has not been recorded within this habitat.
- Overall, the exotic grassland habitat is assessed as having Negligible ecological value.

432. Areas of exotic shrubland are summarised as follows:

- The exotic scrubland occurs in sporadic patches throughout the site and is predominantly vegetated with blackberry and/or gorse, with blackberry generally occurring in wetter areas and gorse in drier areas.
- Where the scrub is relatively sparse, exotic grassland species are also present, while denser areas generally comprise monocultures of either blackberry or gorse.
- Both blackberry and gorse are identified as pest plants under the Greater Wellington Regional Pest Management Plan, with occasional inkweed and brush wattle seedlings and saplings also present.
- The exotic scrubland is not representative of a naturally occurring habitat type and is therefore assessed as having Negligible botanical value.
- The scrubland may provide some seasonal food for native birds, particularly when blackberry is flowering or fruiting, and may also provide potential nesting habitat for At Risk – Declining pipit.
- The ecological benefit associated with blackberry is limited by the potential for birds feeding on its fruit to disperse its seeds and contribute to the spread of this pest plant.
- The scrubland may also provide potential habitat for native skinks, including northern grass skink, although it is considered highly unlikely to support arboreal lizard species such as geckos.

Overall, taking into account its botanical value and potential habitat for native fauna, the exotic scrubland is assessed as having Low ecological value.

AVIFAUNA (MANU)

433. As further described in Section 5.2 of the *Assessment of Ecological Effects*, the avifauna of the Site and surrounding landscape was assessed through a desktop review of historic bird records within 5 km of the site, together with opportunistic observations undertaken during the site visit. The assessment focused particularly on the potential presence of Threatened and At-Risk species and the significance of bird habitat within the site. The key findings of the assessment are:

- A relatively large number of Threatened and At Risk bird species have been recorded within 5 km of the site, although many of these records are associated with Kapiti Island, Waikanae Estuary Scientific Reserve, and coastal, estuarine or forest habitats that are not present within the site.

- A range of indigenous bird species were observed during the site visit, including kōtare/New Zealand kingfisher, pūkeko, spur-winged plover, rirorirо/grey warbler, welcome swallow and New Zealand pipit, together with a number of introduced species.

- New Zealand pipit (At Risk – Declining) was the only At Risk or Threatened species confirmed on the site during the survey and was observed foraging within the open grassland. The scrubland may also provide potential breeding and nesting habitat for this species.

- New Zealand dabchick (Threatened – Nationally Increasing) and New Zealand dotterel (Threatened – Nationally Increasing) were identified through the desktop assessment as potentially occurring within or immediately adjacent to the site, although neither was confirmed on the site during the survey.

- The proximity of Kapiti Island increases the potential for threatened or at-risk forest birds to occasionally reach the mainland. However, species such as North Island kōkako, kākāriki and North Island saddleback are highly unlikely to use the site due to the absence of suitable mature forest habitat.

- The nearby Waikanae Estuary Scientific Reserve supports a range of estuarine bird species, some of which may occasionally use inland farmland and ponds for roosting or shelter, particularly during high tides or storm events. Shags, spoonbills and oystercatchers may therefore occasionally use the site or adjoining habitats.

- Kārearea/New Zealand falcon (Threatened – Nationally Increasing) has been recorded within 5 km of the site and its presence cannot be ruled out, although it is considered unlikely to use the site for more than occasional foraging.

- North Island kākā (At Risk – Recovering) has also been recorded within 5 km of the site but is considered highly unlikely to use the site due to the absence of suitable mature forest, food and nesting resources.

434. Overall, the Site provides habitat for Not Threatened and At Risk native birds, including potential breeding and nesting habitat for species such as pūkeko and New Zealand pipit. Habitat for Threatened species is limited, with any use of the site by these species expected to be temporary or occasional. The Site is therefore assessed as having Moderate ecological value for avifauna.

HERPETOFAUNA

As further described in Section 5.3 of the *Assessment of Ecological Effects*, the herpetofauna values of the site and surrounding area were assessed through a desktop review of existing records within 5 km of the site, together with a targeted field survey using Artificial Cover Objects (ACOs), opportunistic habitat searches and visual encounter surveys. The assessment considered the potential presence of native lizards, the suitability of habitats within the site and the conservation status of species potentially present. The key findings of the assessment are:

- Five indigenous lizard species have been recorded within 5km of the site, including Ngahere gecko, barking gecko, copper skink, northern grass skink and Raukawa gecko.

- Of these species, Ngahere gecko, barking gecko and copper skink are classified as At Risk – Declining, while northern grass skink and Raukawa gecko are classified as Not Threatened.

- Ngahere gecko has previously been recorded along the northern boundary of the site, while barking gecko, copper skink and northern grass skink have been recorded in similar open farmland habitats within the surrounding area.

- Targeted field surveys involved 192 individual ACO inspections, together with approximately four person-hours of opportunistic habitat searching and visual encounter surveys across areas considered suitable for lizards.

- No native or exotic lizards, or evidence of lizards, were detected during the targeted surveys or previous site visits. No plague skinks, which are classified as an Unwanted Organism under the Biosecurity Act 1993, were detected.

- Despite the absence of detections, the potential presence of native skinks cannot be entirely ruled out, given their cryptic nature and the presence of some suitable habitat within the site.

- If native skinks are present, they are expected to occur at very low densities, with the low likelihood of occurrence likely reflecting the site's historical agricultural use, limited opportunities for recolonisation and predation pressure from introduced mammals.

- Suitable native lizard habitat within the site is largely confined to the exotic scrubland habitat, which may support ground-dwelling skinks but is considered highly unlikely to support native arboreal gecko species.

- Northern grass skink is considered more likely to occur than copper skink, as it is better able to persist within highly modified habitats.

- The proposed works have the potential to disturb any native skinks that may be present within areas of exotic scrubland. As native lizards are protected under the Wildlife Act 1953, a Lizard Management Plan (LMP) has been prepared and accompanies this application.

435. Overall, the site is assessed as having Moderate ecological value for lizards, although this value is specifically associated with the exotic scrubland habitat.

BATS (PEKAPEKA)

As further described in Section 5.4 of the *Assessment of Ecological Effects*, bat values within the site and surrounding area were assessed through a desktop review of Department of Conservation bat records, together with a targeted field survey using five Automatic Bat Monitors (ABMs) deployed across the site between November 2024 and January 2025. The assessment considered the potential presence of New Zealand's two endemic bat species, the long-tailed bat and short-tailed bat, and the suitability of habitat within the site.

The key findings of the assessment are:

- No bats have been recorded within 5km of the site, with the closest record being a long-tailed bat approximately 9.5km northwest of the site on Kapiti Island.

- The closest mainland bat records are more than 20km from the site and are predominantly associated with dense forest environments.

- The five ABMs recorded an average of 36 valid survey nights per monitoring location, providing a substantial survey period under suitable weather conditions.

- No bat activity was detected anywhere within the site during the targeted field survey.

- Short-tailed bats are considered highly unlikely to occur within the site due to their more specific habitat requirements, relatively limited mobility and the absence of nearby records, with the closest known record more than 20 km away.

- While there are some small pockets of mature exotic trees within the site, the site is otherwise highly modified, contains limited mature vegetation and is located within an increasingly urbanised environment.

- Taking into account the absence of bats during the targeted surveys, absence of records within 5 km, limited suitable habitat and modified urban setting, the probability of bats occurring within the site is considered very low.

Overall, the Site is assessed as having Negligible ecological value for bats, and bats are therefore not considered further in the ecological assessment.

WATERCOURSES

436. As further described in Section 5.5.3 of the Assessment of Ecological Effects, the freshwater features within the site comprise the Wharemauku Stream, Watercourse 1, Drains 1-4, and six smaller drains. Several overland flow paths are also present in the southern portion of the site. All watercourses are depicted on Figure 19 of the assessment and provided as **Figure 12** below.

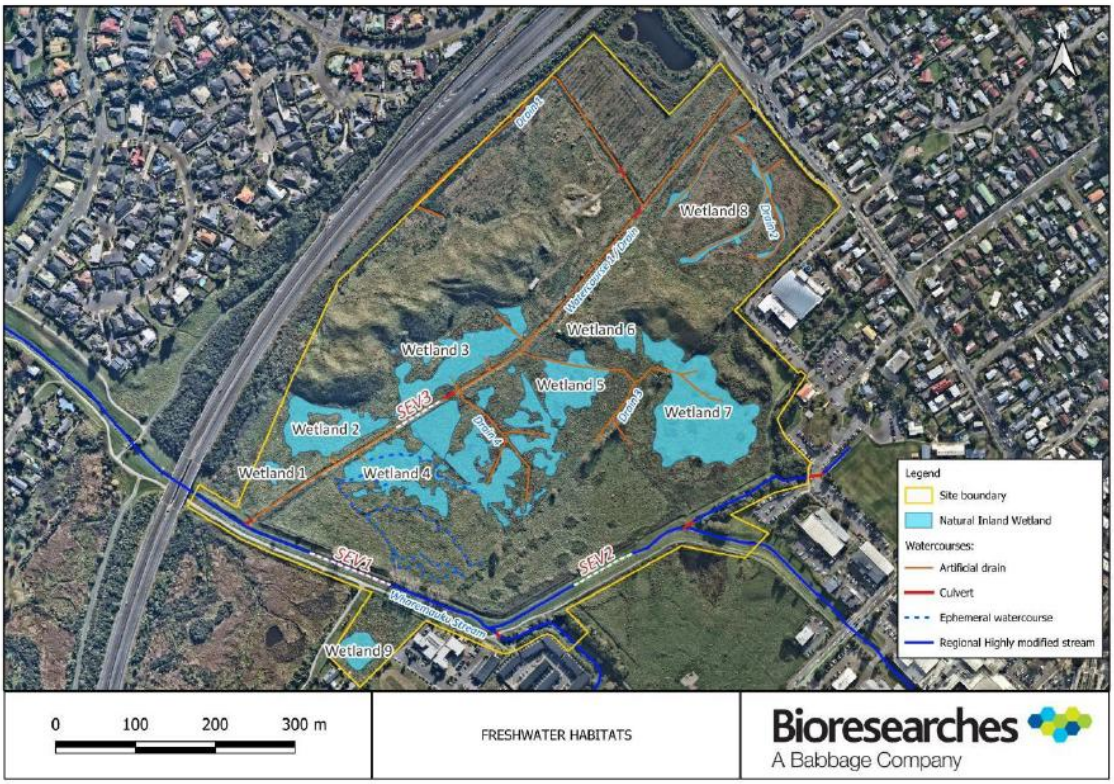


Figure 19. Stream and wetland habitats within the site, and stream ecological valuation assessment areas.

FIGURE 12: ON-SITE FRESHWATER HABITATS (Source: Assessment of Ecological Effects, Bioresearches (2026))

437. Based on correspondence with GWRC ecology advisors, a watercourse classification assessment of the Site was completed in early September that provided a consolidated assessment of desktop and site observations. The assessment included ground-truthing of the watercourses identified within GWRC mapping, including features mapped as natural rivers/streams and within the Regional Highly Modified Streams overlay.

438. Of particular relevance, Drain 3, which occurs in the same general location as a watercourse identified as a natural stream in the GWRC mapping, was found to be a straightened drainage feature with a uniform depth and width and no natural meanders. The feature is also not evident in historical aerial imagery prior to 1998. On this basis, Bioresearches classified Drain 3 as an artificial watercourse rather than a natural stream. The northern-most and southern-most natural rivers/streams shown on the GWRC mapping were also investigated and found not to exist on the Site.

439. These findings are consistent with the earlier assessment undertaken by Boffa Miskell (2022). The watercourses confirmed as being present within the Site have subsequently been grouped and classified according to their physical characteristics, including their size, form and condition, as described further in the Ecological Impact Assessment.

440. A detailed description of all site watercourses is provided in Section 5.5.3 of the *Assessment of Ecological Effects.*

FRESHWATER FISH

441. Freshwater fish values within the Site and surrounding catchment were assessed through a combination of a desktop review of records held in the New Zealand Freshwater Fish Database (NZFFDB) and targeted on-site freshwater fish surveys undertaken in 2023 and 2024.

442. The NZFFDB review identified eight native fish species within the Wharemaukū Stream catchment, together with kōura/freshwater crayfish and freshwater shrimp. The recorded fish community includes shortjaw kōkopu (Threatened – Nationally Vulnerable) and three At Risk – Declining species comprising longfin eel, kōaro and īnanga. Other native species recorded within the catchment include shortfin eel, banded kōkopu and common bully, which are classified as Not Threatened. Kōura/freshwater crayfish and freshwater shrimp have also been recorded within the catchment and are classified as Not Threatened.

443. Targeted on-site fish surveys were undertaken within the Wharemaukū Stream and Watercourse 1, using a combination of overnight trapping and environmental DNA (eDNA) sampling. The survey included:

- overnight trapping undertaken in 2023 and 2024, including the use of Gee's minnow traps and fyke nets within the Wharemaukū Stream;
- targeted trapping within the lower section of Watercourse 1, where sufficient water depth was available;
- targeted brown mudfish surveys in 2024, involving Gee's minnow traps placed at four locations within the Site's drainage network, with survey locations selected to target wetland-associated drainage and other habitat potentially suitable for mudfish, including areas around culverts; and
- three replicate eDNA samples collected at each of two locations within Watercourse 1, including locations downstream of drainage inputs associated with the Site's wetland areas.

444. A separate wider desktop search was also undertaken for brown mudfish (At Risk – Declining), reflecting the species' different habitat requirements and potentially lower detectability. This identified records within approximately 2.5km of the Site, together with additional records further north within similar dune-wetland environments.

445. Brown mudfish can occupy wetlands, drains, forest pools and shallow ephemeral dune swamps, including habitats which may periodically dry out. The Site's pre-development environment is likely to have included shallow dune-wetland habitat potentially suitable for the species; however, this habitat has subsequently been extensively modified through vegetation clearance, drainage and agricultural activities. Given the extent of this historical modification, the ecological assessment considers it unlikely that brown mudfish have persisted within the Site, although their presence cannot be entirely ruled out. As brown mudfish are non-diadromous and do not require connectivity with the sea, the modified or disconnected nature of some drainage features does not, in itself, preclude their potential presence.

WETLANDS

446. As further described in Section 5.5.4 of the *Assessment of Ecological Effects*, the site contains wetland systems which would have most likely originally been separated by the dune system. As described in the assessment, the wetland system in the northern portion of the site was cleared of vegetation in 2018, and most likely at that time also had drains installed. South of the dune system, wetlands are present on both sides of Watercourse 1. These wetlands have been grouped into clusters based upon their features such as permanency of saturation and vegetation types.

447. As described in Section 4.1 of the assessment, these wetlands would have historically been vegetated with kahikatea-dominated swamp forest, which would have graded into wetland habitat near open water areas; with local-ised mānuka-dominated fen habitats also present. However, owing to the site's agricultural history, all wetlands within the site have been cleared of original vegetation and are classified as 'Exotic Wetlands' as they are heavily dominated by exotic species, including water pepper (*FACW*), Mercer grass (*Paspalum distichum; FACW*) and creeping bent (*Agrostis stolonifera; FACW*).

448. All wetlands within the site were dominated by FACW and/or OBL plant species, and consequently were identified using the rapid test; however, one vegetation plot was utilised to confirm if one portion of Wetland 7 met the criteria to be considered part of that wetland. All wetlands contained just one herbaceous vegetative tier, limiting habitat complexity within the wetlands.

449. All wetlands are 'palustrine'; and would most likely have all originally been fens, however increased nutrient inputs have led to the development of more 'swamp-like' characteristics. None of the wetlands have obvious inflows, and it is most likely that the primary driver for the formation of the site's wetlands is the high ground-water table, although some inputs from (very) localised surface runoff and rainfall would occur.

450. All wetlands within the Site are heavily impacted by historic and ongoing stock access and grazing, which has led to pugging, vegetation modification and reduced water quality. Heavy grazing from Canada geese was also occurring in localised areas of wetlands and on the wetland edges. None of the wetlands have an effective riparian buffer; and were primarily surrounded by grassland or exotic scrubland.

451. Specific features pertaining to individual wetlands or wetland clusters is described in Sections 5.5.4.1 to 5.5.4.9 of the Assessment and Table 10 in Section 5.5.4.10 then summarises the ecological value of each of the wetlands.

ECOLOGICAL VALUES SUMMARY

452. Table 11 of the *Assessment of Ecological Effects* summarises the ecological values of the habitats and species identified within and surrounding the site. This table is provided below.

Table 11. Summary of ecological values of habitats and species within and surrounding the site.

Grouping	Species or habitat	Ecological value
Terrestrial Habitat	Exotic grassland	Negligible
	Exotic scrubland	Low
Freshwater Habitat	Wharemauku Stream	Moderate
	Watercourse 1	Negligible (upper reaches) and Low (in lower reaches near Wharemauku Stream).
	Drain 1	Negligible
	Drain 2	Negligible
	Drain 3	Negligible
	Drain 4	Negligible
Wetland Habitat	Wetland 1	Low
	Wetland 2	Moderate
	Wetland 3	Moderate
	Wetland 4	Moderate
	Wetland 5	Moderate
	Wetland 6	Low
	Wetland 7	Moderate
	Wetland 8	Low
	Wetland 9	Low
Fauna	Native fish	Moderate
	Avifauna	Moderate
	Herpetofauna	High
	Bats	Negligible, not considered further.

6.1.7 TOPOGRAPHY AND GEOTECHNICAL CONSIDERATIONS

453. The geotechnical conditions of the Site have been investigated and are described in detail in the *Geotechnical Assessment Report* provided in **Appendix 21.**

454. The investigations identify that the majority of the Site is underlain by a layer of peat generally ranging between approximately 0.2m and 2.0m in thickness, with an isolated area where peat extends to approximately 2.6 m depth. The peat is generally underlain by medium dense sand, with gravels also present beneath parts of the site at variable depths.

455. A prominent dune system extends through the site and is elevated approximately 10m above the surrounding land. The northern sides of the dunes are generally more moderately sloping, with slopes ranging between approximately 10° and 25°, while the southern sides are typically steeper, ranging between approximately 20° and 45°. Some areas of the dunes have previously been cut and currently include near-vertical faces. A vehicle track also extends along the crest of the dunes. Notwithstanding the variable and locally steep topography, the geotechnical investigations identified no obvious evidence of instability within the dune slopes.

456. For seismic design purposes, the site has been classified as Site Subsoil Class D – Deep or Soft Soil Site in accordance with NZS 1170.5:2004. The site is located approximately 2 km from the nearest mapped active fault.

457. The GWRC hazard mapping identifies the site as being subject to a moderate to high combined earthquake hazard. This comprises a low slope failure hazard, moderate ground-shaking hazard and high liquefaction hazard. These geotechnical conditions and identified natural hazards, together with the measures required to appropriately manage them through the design and development of the Project, are addressed in the *Geotechnical Assessment*.

GROUNDWATER

458. The *Hydrological Effects Assessment Report* prepared by Williamson Water & Land Advisory (WWLA), and provided in **Appendix 30,** provides a detailed assessment of the existing groundwater environment across the Site and surrounding catchment.

459. The report sets out that the Site is located within the Waikanae Groundwater Zone and is underlain by a layered groundwater system comprising shallow peat and organic soils, dune sands and deeper alluvial deposits. The shallow groundwater system is characterised by perched groundwater within the peat deposits, while the underlying sands and gravels support a deeper regional groundwater system. Groundwater is generally shallow across the low-lying parts of the Site, typically encountered within approximately 0.2–1.5 m of ground level, contributing to seasonal soil saturation, surface ponding and the existing wetland conditions. Regional groundwater flow is generally towards the west/northwest, with groundwater discharging locally to artificial drains and the Wharemaukū Stream.

460. Importantly, the existing groundwater conditions have been informed by site-specific investigations and monitoring. ENGEO established 11 groundwater monitoring wells across the Site in 2024, with 351 days of continuous groundwater monitoring undertaken between October 2024 and October 2025 (data was obtained from 10 wells). This was supplemented by further groundwater measurements undertaken by Torlesse in June 2026, together with historical borehole information and regional groundwater monitoring data. The continuous monitoring identified relatively limited seasonal groundwater level variation, generally in the order of 0.6m within the shallow peat deposits.

461. Using this information and monitoring data, WWLA developed a three-dimensional numerical groundwater model of the Site, surrounding catchment and underlying aquifer. The model incorporates the site-specific monitoring data, geological investigations and long-term climatic records, and has been used to characterise existing groundwater conditions and assess potential changes during construction and following development. The modelling includes a historical simulation covering approximately 32 years and eight months (January 1994 to August 2026), providing a basis for assessing seasonal and longer-term groundwater behaviour.

462. Further details of the existing groundwater environment, monitoring programme and numerical modelling are provided in Sections 3–5 of the WWLA report provided in **Appendix 30**.

6.1.8 SITE HAZARDS

GEOTECHNICAL HAZARDS

463. The *Geotechnical Assessment Report* prepared by Torlesse Ltd and provided in **Appendix 21** identifies and assesses the geotechnical hazards associated with the Site and proposed development.

464. The principal geotechnical considerations include liquefaction, settlement, lateral spreading, slope stability, groundwater conditions and the presence of peat and organic soils. The report also considers the implications of earthworks and construction activities for neighbouring land and infrastructure.

465. The following provides a summary of the identified hazards and the findings of the assessment:

- **Weak and variable soils:** The Site generally comprises approximately 0.5–1.5m of fibrous peat over organic sands and dune sands, underlain by dense sands and gravels. Peat and highly organic soils present potential settlement and foundation performance issues if left untreated. These materials are proposed to be removed beneath building platforms and road corridors and replaced with engineered fill (refer sections 6.2, 7.1 and 8.2).

- **Liquefaction:** Liquefaction is predicted to occur within discrete soil layers during an Ultimate Limit State (ULS) earthquake, rather than throughout the soil profile. Estimated free-field settlement ranges from approximately 15–45mm, corresponding to MBIE performance levels L1–L2. Liquefaction effects during Serviceability Limit State (SLS) events are expected to be minimal (refer sections 6.3.2 and 8.2).

- **Lateral spreading:** The risk of lateral spreading is assessed as low, having regard to the anticipated ground conditions and proposed engineering measures, including appropriate foundation design and treatment near free faces (refer sections 6.3 and 8.2).

- **Slope stability:** Potential slope stability issues have been assessed in relation to the central stormwater swale, proposed earthworks and temporary cuts adjoining the Kapiti Expressway, and the proposed Lookout. The analyses indicate that the relevant target factors of safety can be achieved, although some localised movement and damage may occur during a major earthquake (refer sections 6.4 and 8.2).

- **Groundwater and dewatering:** Shallow perched groundwater is present across parts of the Site, with particularly high groundwater levels identified near the Expressway. Groundwater conditions will need to be managed during earthworks and infrastructure construction, including through dewatering and subsoil drainage. Settlement effects on neighbouring infrastructure and buildings arising from temporary dewatering are expected to be negligible (refer sections 6.4, 7.3 and 8.1).

- **Long-term settlement:** The potential for settlement associated with peat and organic soils has been assessed. Subject to removal of unsuitable material and replacement with engineered fill, long-term settlement is expected to be minimal. Creep settlement of the remaining organic sands is estimated at approximately 3–5mm over a 50-year design life. (Sections 6.4, 7.4 and 8.2).

- **Active faulting:** The Site is approximately 1.8 km from the Ōhariu Fault and is outside the mapped fault deformation zone. The associated risk is assessed as low. (Section 6.6, Table 17).

466. Overall, Torlesse concludes that, subject to implementation of the recommended engineering measures, the identified geotechnical hazards present a low risk to the land, proposed buildings and infrastructure and are unlikely to be accelerated or worsened by the proposed development. An assessment of the geotechnical hazard effects of the Proposal is provided in **Section 11** of this Application.

FLOOD HAZARD

467. The Site is subject to a number of flood hazards identified on the District Plan flood hazard maps, as illustrated in **Figure 13** below. These include:

- **Flood Storage Area:** Approximately 15.2ha of the Project Area is identified as flood storage, principally across the low-lying southern portion of the Site adjoining the Wharemaukū Stream.
- **Stream Corridor:** Approximately 4.78ha is identified as stream corridor, associated with the Wharemaukū Stream and existing drainage channels.
- **Ponding Area:** Approximately 3.38ha is identified as subject to ponding, including low-lying areas where floodwaters accumulate during storm events.
- **Overflow Paths:** The District Plan also identifies overflow paths associated with the conveyance of floodwaters across the Site.



FIGURE 13: KCDC FLOOD HAZARD MAP (Source: KCDC GIS)

468. *'Flood Storage Area'* is defined in the District Plan as follows:

> *"Land that provides flood water storage either during or after a flood event. Flood storage areas are located on local streams only. They include land that has been identified as flood prone where loss of storage due to mitigation measures, or filling, will cause flooding elsewhere. Any proposal for development of these areas (including filling) will need to provide compensatory storage below set ponding levels."*

469. The existing flood characteristics of the Site and the wider Wharemaukū Stream catchment have been assessed in the *Flood Risk Assessment* prepared by Envelope Engineering, provided in **Appendix 15**.

470. The Site is located approximately midway within the Wharemaukū Stream catchment. The Wharemaukū Stream runs along the southern portion of the Site and conveys runoff from the upstream catchment. During flood events, flows extend beyond the stream channel into adjoining low-lying areas, resulting in extensive flood storage and ponding across the southern part of the Site. Additional stormwater enters the Site from the northeast via the existing stormwater network and is conveyed through existing drainage channels. Localised ponding also occurs within topographical depressions across the Site.

471. KCDC is currently updating its hydraulic modelling for the Wharemaukū catchment. The assessment uses the updated KCDC model supplied in June 2026, refined using site-specific survey and drainage information to assess existing flood conditions for the 10-year and 100-year ARI events, including climate change allowances.

472. The modelling shows that flooding occurs across the lower-lying parts of the Site, with the greatest flood depths and hazards generally associated with the existing drainage channels and the Wharemaukū Stream.

473. The existing flood hazards, the effects of the proposed development on flood conveyance and storage, and the measures incorporated into the Project to manage flood risk within the Site and wider catchment are addressed in detail in the *Flood Risk Assessment*.

6.1.9 LANDSCAPE CHARACTERISTICS

474. The existing landscape character, values and visual context of the Site and surrounding area are described in detail in the *Landscape and Visual Assessment* provided in Appendix 25. The following provides a brief summary of that assessment.

475. As detailed in the assessment, the Site is located within the urbanised coastal environment of Paraparaumu, immediately adjacent to the established town centre. Although within the identified Coastal Environment in the District Plan, it is physically separated from the coastline by established urban development and the Kapiti Expressway. The surrounding environment is highly modified and comprises a mix of residential, commercial, civic, recreational and transport activities, together with remnant dune landforms, waterways and wetlands.

476. The Site itself is currently predominantly open and undeveloped. The wider landscape is generally low lying and relatively flat, with remnant coastal dune formations providing localised variation in elevation. The principal landscape features within and adjoining the Site are the western and eastern dune landforms, Wharemaukū Stream and associated wetland and drainage areas. As further described in the assessment, these features provide some contrast to the surrounding urban environment and retain a connection with the coastal processes and landforms that have shaped the wider Paraparaumu area.

477. Overall, the assessment describes the wider receiving environment as having an *"urban character with remnant coastal landscape characteristics",* rather than a rural or predominantly natural character. It is strongly influenced by established and intensifying urban development, major transport infrastructure and commercial and civic activities. The receiving environment is assessed as having Moderate sensitivity to change, while recognising that the dune landforms and Wharemaukū Stream have greater local sensitivity due to their contribution to landscape and natural character.

6.1.10 LANDSCAPE VALUES

478. As detailed further in the *Landscape and Visual Assessment*, the Site is not identified as an Outstanding Natural Feature or Landscape or Special Amenity Landscape under the District Plan. It is, however, located within the identified Coastal Environment and contains dune landforms, Wharemaukū Stream and wetland features that contribute to its existing landscape and natural character.

479. The principal physical landscape values are associated with the dune landforms and waterways. The western dune is the most prominent topographical feature within the Site and provides spatial definition and some physical and visual separation from the Kapiti Expressway. The smaller eastern dune has a more localised influence. Wharemaukū Stream also forms an identifiable landscape and recreational feature through the otherwise modified urban environment. As noted in the assessment, the landscape value of the dune landforms is principally at the *"local and site scale, rather than as features of wider landscape significance."*

480. The Site's perceptual values principally arise from the contrast between its current open and undeveloped appearance and the surrounding urban environment. These values are influenced by the adjoining town centre, residential and commercial development, civic facilities and the Kapiti Expressway. The LVIA

therefore assesses the Site's perceptual values as Moderate overall, with greater value associated with the dune formations, open space and Wharemaukū Stream than the more modified parts of the Site.

481. The associative values identified in the assessment principally relate to the Site's position within the Paraparaumu urban area and its relationship with the wider coastal environment. The dune formations and Wharemaukū Stream retain connections with the landforms and processes that have shaped the Kapiti coastal environment, while the Site is also associated with the ongoing growth and development of the Paraparaumu town centre. Mana whenua and cultural values are addressed separately through the relevant cultural assessment and engagement undertaken for the Project.

482. The assessment ultimately assesses the dune topography as having Moderate–High sensitivity to change, Wharemaukū Stream as having Moderate sensitivity, and the more modified waterways, drains and wetlands as having Moderate–Low to Low sensitivity. These landscape values and sensitivities provide the basis for the assessment of landscape, natural character and visual effects addressed later in this AEE and in greater detail in the assessment.

6.1.11 CONTAMINATED LAND

483. A *Preliminary Site Investigation* has been prepared by HAIL Environmental Limited and is included as Appendix 31 to this application. As described in Sections 1 and 3 of the *Preliminary Site Investigation*, the Site is largely undeveloped and has historically been used predominantly for pastoral grazing. The central part of the Site, within 77 Kapiti Road, has also accommodated rural residential activities from approximately the 1980s until the early 2020s, a farm education/training facility during the 1980s and 1990s, and a firewood storage operation from the late 1980s until 2015.

484. The historical investigation undertaken as part of the *Preliminary Site Investigation* identified a dwelling and farm training shed within the central part of 77 Kapiti Road by 1985. A hydroponics building was subsequently established immediately north of the farm training building. Kapiti Firewood also operated from areas within 77 and subsequently 109 Kapiti Road. The *Preliminary Site Investigation* records that the firewood activity principally involved the storage of firewood, with some splitting occurring during the later period of occupation, and that fuel was not stored on the Site.

485. The *Preliminary Site Investigation* Site details that the Site is not identified in the Greater Wellington Regional Council's Selected Land Use Register (SLUR) as having been subject to activities included on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL). Notwithstanding this, the PSI has conservatively identified a discrete area associated with the former dwelling and hydroponics building at 77 Kapiti Road as potentially having been subject to HAIL activities.

486. As set out in Section 5.1 of the *Preliminary Site Investigation*, the former weatherboard dwelling was destroyed by fire and may have contained asbestos-containing materials and, given its age, may also have contained lead-based paint. The construction materials used for the former hydroponics building are not known, although anecdotal evidence indicates that some form of "board-like" material may have been used. The September 2026 site inspection identified burnt remains of the former dwelling, including timber beams, corrugated iron, concrete foundations and possible asbestos insulation.

487. On this basis, HAIL Environmental has conservatively identified the area surrounding the former dwelling and hydroponics building as potentially falling within the following HAIL categories:

- *E1 (asbestos products manufacture or disposal, including sites with buildings containing asbestos products known to be in a deteriorated condition); and/or*
- *I (land subject to the accidental or intentional release of a hazardous substance in sufficient quantity that it may pose a risk to human health or the environment).*

488. This discrete area, approximately 4,600 m², is consequently treated as the relevant "piece of land" for the purposes of the NES-CS. No current or former HAIL activities were identified across the remainder of the Site. Refer Section 5.1 and Figure 2 of the *Preliminary Site Investigation.*

489. The contaminants of potential concern within this discrete area are therefore limited principally to lead associated with former lead-based paint and asbestos associated with former building materials. The *Preliminary Site Investigation* identifies inhalation and ingestion of contaminated dust and sediment-laden stormwater runoff during earthworks as the principal potential exposure/transport pathways.

490. As discussed further in Sections 5.4–5.6 of the PSI, the proposed development will involve removal of surface material from this area as part of the wider earthworks. HAIL Environmental concludes that this will likely remove any residual lead and/or asbestos, if present, such that there will be *"no complete contaminant linkages"* in the completed development. On this basis, the PSI concludes that the proposed change of use is highly unlikely to pose a risk to human health and satisfies the permitted activity requirements of Regulation 8(4) of the NES-CS.

491. However, the scale of proposed soil disturbance within the approximately 4,600m² "piece of land" is unlikely to comply with the permitted activity thresholds under Regulation 8(3). In the absence of a Detailed Site Investigation, the *Preliminary Site Investigation* therefore identifies the soil disturbance as requiring discretionary activity consent under Regulation 11 of the NES-CS, limited to that discrete piece of land. HAIL Environmental recommends that soil sampling be undertaken to determine appropriate on-site reuse and/or off-site disposal options for material from this area, with this requirement secured through conditions in the *draft consent conditions*.

6.1.12 CULTURAL VALUES

492. The Site and surrounding Paraparaumu area have longstanding cultural and historical associations for iwi and hapū with interests in the area, including Te Ātiawa ki Whakarongotai, Puketapu ki Paraparaumu Hapū, Ngāti Toa Rangatira and Muaūpoko.

493. Ātiawa ki Whakarongotai Charitable Trust has prepared an *Interim Cultural Impact Assessment*, which identifies the cultural values associated with the Site from the perspective of Te Ātiawa and considers the potential effects of the Proposal on those values. The CIA draws on the Trust's Kaitiakitanga Plan, Whakarongotai o te moana, Whakarongotai o te wā, together with cultural knowledge, historical information and input from the Trust's Taiao Advisory Kōmiti and Board of Trustees.

494. The *Interim Cultural Impact Assessment* describes the relationship of Te Ātiawa with the Site as part of a wider cultural landscape, recognising the interconnected relationships between whenua, wai, wetlands, dunes and the surrounding environment. In particular, the assessment identifies the cultural importance of the existing sand dunes, the Wharemaukū Stream and wetlands, including their relationship with whakapapa, mauri, mahinga kai and the exercise of kaitiakitanga. The assessment also recognises that, notwithstanding historical modification of the Site, these features and their relationships with the wider landscape continue to hold cultural value. The assessment emphasises the importance of maintaining connections with the whenua and wai, and opportunities for restoration, cultural expression and the ongoing exercise of kaitiakitanga.

495. The assessment is included as **Appendix 33** of this application.

6.1.13 ARCHAELOGICAL VALUES

496. An *Archaeological Assessment of Effects* has been prepared by Emily Howitt and is provided in **Appendix 34.** The assessment identifies that the Project Area is located within the wider Kapiti coastal dune landscape, comprising remnant Foxton-age sand dunes and low-lying former wetland areas. This landscape has a well-established association with pre-European Māori activity, particularly temporary or seasonal resource-gathering and shellfish-processing sites located on dune landforms adjoining former wetlands and waterways.

497. One recorded archaeological site, R26/829, is located within the Project Area. The site comprises scattered tuatua and triangle shell, together with fire-cracked rock, and is interpreted as a shell midden. Two additional locations of sparse surface shell may indicate subsurface archaeological deposits. The assessment also identifies numerous archaeological sites in the adjoining M2PP Expressway corridor, including sites recorded on the same dune ridge that extends into the Project Area. This evidence

supports a high probability that further, presently unrecorded archaeological sites will be encountered during earthworks within the remnant dune areas.

498. The assessment concludes that earthworks within the dune landforms have the potential to adversely affect recorded and unrecorded subsurface archaeological features, which are most likely to occur within the upper 500mm of soil. The lower-lying former wetland areas have a lower probability of containing archaeological features. Avoidance of all archaeological sites is not practicable given the extent of proposed earthworks across the dune landforms.

499. An Archaeological Authority is therefore sought as part of this application. Effects will be managed through the *Archaeological Management Plan* provided in **Appendix 35,** including targeted monitoring by a suitably qualified archaeologist of cut earthworks within the sand dune areas; recording, investigation and analysis of archaeological material encountered; and sampling, including radiocarbon dating where appropriate. The assessment concludes that, subject to these measures and the conditions of the Archaeological Authority, archaeological effects will be appropriately managed.

6.1.14 SURROUNDING ENVIRONMENT

500. The Site is located on the western edge of the Paraparaumu town centre and occupies a transitional position between the established town centre and the Kapiti Expressway. The surrounding environment is characterised by a mix of urban and peri-urban elements, including large format retail, commercial activities, transport infrastructure, open space and undeveloped land.

501. The *Urban Design Assessment* attached in **Appendix 5** identifies that the existing town centre environment is predominantly car-oriented, with large-format retail buildings, expansive surface carparking, and limited street-based activation. While the centre performs an important commercial function, it currently lacks a clearly defined urban structure, legible movement network, and strong sense of place. Pedestrian and cycle connections are fragmented, and there is limited integration between different parts of the centre.

502. The Site itself reflects this transitional context. It is largely undeveloped and characterised by open grassland, modified drainage channels, remnant dune landforms, and a realigned and straightened Wharemaukū Stream along its southern boundary. These features contribute to an urban-fringe character, with ecological and hydrological systems that extend beyond the site and into the wider catchment.

503. To the north and east, the Site is bounded by established urban development, including commercial and retail activities along Kapiti Road, as well as civic and community facilities within the wider town centre. To the west, the Kapiti Expressway forms a significant infrastructural edge, generating both visual and aural effects, but also providing a clear boundary to urban expansion. To the south, the Wharemaukū Stream corridor provides an important ecological and open space connection.

504. The *Urban Design Assessment* notes that the wider environment is in transition, with the MCZ Structure Plan anticipating a more compact, mixed-use and connected urban form over time. In this context, the site represents a key opportunity to contribute to the evolution of the town centre by providing improved connectivity, a more coherent urban structure, and enhanced integration between built form and natural systems.

505. Overall, the surrounding environment is characterised by a mix of established urban development, infrastructure and natural features, with the site occupying a strategically important location that plays a significant role in the planned growth and transformation of the Paraparaumu town centre.

SURROUNDING TRANSPORT NETWORK

506. The Site is located immediately west of the established Paraparaumu town centre and is well connected to the existing local and strategic transport network. It is generally bounded by the Kapiti Expressway to the west, Kapiti Road to the north, Ihakara Street to the south, and Brett Ambler Way / Iver Trask Place to the east.

507. The surrounding transport network is detailed in Section 5 of the *Integrated Transport Assessment* and is summarised as follows:

- Kapiti Road adjoins the northern boundary of the Site and is identified as a Major Community Connector in the District Plan. It provides the principal east-west connection between the Paraparaumu town centre, Kapiti Expressway and coastal areas. In the vicinity of the Site it carries approximately 22,000 vehicles per day and has a posted speed limit of 50 km/h. The Kapiti Road / Arawhata Road intersection is signalised and has been configured to enable a future fourth intersection leg extending south into the Site.

- Rimu Road, to the east of the Site, is identified as a Centres Route and performs an important town centre access function, including providing access to Coastlands Shopping Centre and surrounding commercial and civic activities. It carries approximately 13,000 vehicles per day and incorporates footpaths and on-road cycle lanes, together with signal-controlled pedestrian crossing opportunities.

- Ihakara Street extends west from Rimu Road and presently terminates adjacent to the southern part of the Site. It is identified as a Major Community Connector. The District Plan Metropolitan Centre Zone Structure Plan provides for its future extension westward beneath the Kapiti Expressway, creating an additional east-west route between the coast and the Paraparaumu town centre.

- Iver Trask Place and Brett Ambler Way provide access along the eastern side of the Site and connect with the established civic and town centre area, including Council offices, the library, community facilities and Aquatic Centre. Iver Trask Place connects with Rimu Road via a signalised intersection and has a relatively low-speed, pedestrian-oriented character. The MCZ Structure Plan identifies a desired connector road extending Iver Trask Place westward through to the future Town Centre Link Road.

- The Kapiti Expressway (State Highway 1) runs along the western side of the Site and provides the principal strategic north-south road connection through the Kapiti Coast.

- The surrounding network also provides a high level of walking and cycling connectivity. Footpaths are provided on the surrounding roads, while shared paths and cycle facilities extend along Kapiti Road and the Kapiti Expressway. The Wharemaukū Stream shared path passes through the Site and provides an important east-west active mode connection between the town centre and residential areas west of the Expressway.

- The Site is also well served by public transport. Bus stops are located on Kapiti Road and Rimu Road, providing connections to surrounding Paraparaumu suburbs and the wider district. Paraparaumu Railway Station and the associated bus interchange are approximately 1 km east of the Site, providing regular rail services on the Kapiti Line between Waikanae and Wellington.

508. The surrounding transport network therefore reflects the Site's location immediately adjoining the existing Metropolitan Centre, with established connections for vehicles, pedestrians, cyclists and public transport. The District Plan's MCZ Structure Plan also anticipates increased permeability through the Site, including the Town Centre Link Road between Kapiti Road/Arawhata Road and Ihakara Street, together with a connection between that route and Iver Trask Place.

7. DESCRIPTION OF THE PROPOSED ACTIVITY – SCHED 5, CL5(1)(A),(E)

509. This section provides a description of the proposed activity in accordance with Schedule 5, Clause 5(1)(a) and (e).

7.1 PROJECT NAME

510. The name of the Project is 'New Central Park'.

7.2 PROJECT AUTHORISED PERSON

511. The Applicant of this referral application is New Central Park Limited. This entity is a member of The Wellington Company group of companies, where NCPL is the SPV set up specifically to develop the project site.

512. The Wellington Company, together with the project team, have significant experience in developments of this nature and has financing to fund the Project.

513. The Authorised Person confirms that the Project is not proposed as an 'alternative project'.

7.3 PROJECT OVERVIEW

514. New Central Park Limited seeks the necessary approvals under the FTAA to undertake the comprehensive subdivision and mixed-use development of land at 77 and 109 Kapiti Road and 1 Brett Ambler Way, Paraparaumu, together with associated works on adjoining land identified in Section 6 above.

515. The Project will deliver 593 residential units, approximately 20,000m² of LFR and 3,800m² of other retail and commercial activities, supported by new transport and three waters infrastructure, open space, ecological restoration and flood management areas.

516. The Project comprises:

- Creation of residential, apartment, retail and commercial allotments and superlots, roads to vest, reserves and associated access, infrastructure and open space allotments.
- Construction of 593 residential units comprising apartments, townhouses, duplexes, courtyard housing and standalone dwellings, together with LFR, speciality retail, commercial and service activities, including drive-through activities, and associated parking, access, signage and landscaping.
- Bulk earthworks, reclamation of approximately 5.33ha of natural inland wetlands, modification and piping of Watercourse 1, culvert works, enhancement of the Wharemaukū Stream corridor, establishment of an indigenous wetland compensation complex, and associated vegetation clearance and ecological management.
- Construction of the Town Centre Link Road and associated road network, pedestrian and cycle connections, water supply and wastewater infrastructure, stormwater collection, treatment and discharge systems, flood storage and conveyance infrastructure, utility networks, and a temporary groundwater take for construction purposes.

The project overview provided in the *Urban Design Statement* is as follows:

- *The proposal has been driven by a strong vision for a high-performing urban environment, informed by known site-specific constraints and opportunities. The masterplan illustrates an appropriate, supportable and best-practice urban design response, consistent with the objectives*

and policies of the relevant statutory plans relating to urban form and development. It illustrates the potential development of a new mixed-use precinct and residential community which:

- *promotes legibility of key connections to the town centre through mixed uses and higher residential density (and greater building height);*
- *transitions from large building footprints and associated car parking through smaller-scale commercial and speciality retail to medium-density residential and open space;*
- *locates large format retail in highly visible locations and adjacent to high-traffic routes which are challenging for residential use, amenity and access, and adjacent to the aquatic centre, which has a similar scale and built form;*
- *establishes a clear central heart/node which leverages off the attraction of large format retail, speciality retail, food and beverage, higher-density residential and public open space;*
- *promotes residential amenity by using landform (dune) as a buffer to the Kapiti Expressway;*
- *maximises amenity and outlook over wetland areas for the wider public;*
- *promotes gateways and landmarks;*
- *retains and provides for views of Kapiti Island;*
- *meets some of residents' daily convenience needs within walking or cycling distance;*
- *appropriately addresses site interfaces; and*
- *allows for logical and integrated development on adjacent land, particularly the delivery of a strong east-west civic spine and future KCDC facilities.*

Further details of the proposal are outlined in the accompanying technical reports and the remaining sub-sections of Section 7 below.

7.3.1 INDICATIVE DEVELOPMENT PROGRAMME

517. The indicative development programme is provided in Appendix 4 and anticipates the staged delivery of the Project over approximately 10 years, from October 2026 to November 2036. The key milestones are summarised below:

- October 2026 – July 2027: Fast-track consenting process and pre-commencement planning.
- November 2027 – April 2028: First earthworks season, including initial landform modification, stream realignment and wetland formation.
- April – June 2028: Wetland and riparian planting.
- October 2028 – April 2029: Second earthworks season, including completion of bulk earthworks and formation of development platforms.
- 2028–2030: Progressive construction of the Link Road, internal roads and associated infrastructure.
- 2029–2030: Construction of the commercial developments, with anticipated openings from July 2030.
- 2030–2034: Progressive delivery of residential stages, with first residential settlements anticipated in June 2030.
- 2034–2036: Construction and completion of the apartment developments.
- 2028–2036: Ongoing ecological maintenance, monitoring and establishment, with wetland reserve vesting anticipated in 2036 following achievement of compensation targets.

518. The programme is indicative, with the timing and sequencing of individual stages subject to detailed design, construction requirements and market demand.

7.4 DEVELOPMENT OF THE PROJECT

519. The revised project and supporting masterplan are the result of an iterative design and assessment process. This has included feasibility testing, concept design development, and the preparation and lodgement of previous resource consent applications, as well as ongoing engagement with mana whenua, KCDC and GWRC.

520. As noted, an earlier referral application was also progressed and approved; however, following further testing, engagement and refinement, that proposal was not advanced. The current proposal reflects a more refined and deliverable masterplan that has been developed in response to the significant work and technical assessment already undertaken.

521. Through these processes, a detailed understanding of the site's physical characteristics, constraints and opportunities has been developed. This includes consideration of flood hazards, existing drainage networks, ecological values, geotechnical conditions, infrastructure capacity, and the site's relationship to the wider town centre. The work undertaken to respond to RFIs from KCDC and GWRC has further refined this understanding and informed the evolution of the masterplan.

522. The *Urban Design Statement* confirms that the current proposal reflects a comprehensive, multi-disciplinary design response, informed by technical inputs across architecture, planning, engineering, ecology and urban design. The masterplan has been iteratively developed to respond to these inputs, with key structuring elements, including the movement network, open space network and land use distribution carefully integrated to achieve a coherent and functional urban environment.

523. Importantly, the Project has not been developed in isolation. It responds to the existing and anticipated future structure of the Paraparaumu town centre, including the MCZ Structure Plan, and has been shaped by an understanding of how the site can most effectively contribute to the function, vitality and growth of the wider centre.

524. Stormwater management and hydrology have also been important considerations throughout the design process. As outlined in the *Stormwater Management Plan* prepared by Envelope Engineering, the proposed approach has been informed by the Site's existing drainage patterns, shallow groundwater, ground conditions, flood hazards and the receiving environment of the Wharemaukū Stream. These considerations have informed the integration of stormwater treatment, passive soakage, attenuation and flood storage within the development, including the proposed wetland compensation area. The approach has also been informed by the supporting hydrological and ecological assessments, particularly in relation to groundwater recharge, stream baseflows and the hydrological requirements of the proposed wetland habitats. Together, these measures reflect the water-sensitive design approach adopted for the Proposal and the integration of stormwater management with the wider urban design, landscape and ecological outcomes.

525. As a result of this iterative process, the Site, its surrounding environment, and the potential effects of development are well understood.

7.4.1 THE REVISED MASTERPLAN

526. The revised masterplan has been developed to provide a comprehensive mixed-use extension to the Paraparaumu town centre, consistent with the development outcomes anticipated by the Metropolitan Centre Zone and associated Structure Plan. As outlined in the *Urban Design Assessment* prepared by Urban Acumen, the masterplan establishes an integrated framework for residential and commercial development, transport connections, public open space, stormwater management and ecological restoration.

527. The masterplan is structured around a number of key design elements, including:

- A clear hierarchy of streets and connections, anchored by the east–west Link Road and its connections to Kapiti Road and the wider transport network, including the proposed Iver Trask Place extension.. The network is supported by pedestrian and cycle connections, including links to the existing town centre, Wharemaukū Stream corridor and wider shared path network.

- A central community heart incorporating specialty retail, commercial activities, higher-density residential development and public spaces. The arrangement of activities is intended to provide a focal point within the development and strengthen connections with the existing civic and commercial centre.

- A range of residential typologies and densities, with higher-intensity development concentrated around the mixed-use centre and a transition to lower-scale residential development towards the adjoining open spaces and other site interfaces.

- Large format retail located towards Kapiti Road, where visibility and accessibility support these activities, with smaller-scale commercial and retail uses providing a transition to the residential areas.

- An interconnected network of public open spaces, pedestrian and cycle paths, landscaped areas and ecological restoration areas, including the proposed wetland compensation complex and enhancement of the Wharemaukū Stream corridor. These areas also contribute to stormwater management and flood storage.

- The integration of modified landforms, landscaped areas and open spaces within the overall development, including the use of landform to provide separation from the Kapiti Expressway and opportunities for outlook towards the wetland and surrounding landscape.

528. The *Urban Design Assessment* identifies that the arrangement of these elements has been informed by the Site's physical characteristics, infrastructure requirements and surrounding urban context. In particular, the masterplan seeks to balance the development capacity anticipated within the Metropolitan Centre Zone with the need to accommodate transport infrastructure, flood management, stormwater servicing, ecological restoration and appropriate interfaces between different land uses.

529. Further details of the design approach and assessment of the proposed urban form are provided in the *Urban Design Assessment* attached in Appendix 5, together with the supporting architectural, landscape, transport and engineering assessments.

7.5 RESIDENTIAL / MIXED USE DEVELOPMENT

7.5.1 RESIDENTIAL PRECINCTS

530. The residential development has been organised into three precincts, reflecting the different characteristics, interfaces and intended functions of the respective parts of the Site. The precinct structure has been developed through the iterative masterplanning and urban design process and provides the overarching framework for the distribution of residential density, housing typologies, open space and supporting activities across the Site. Refer illustration of the proposed precincts in Figure 14 below.

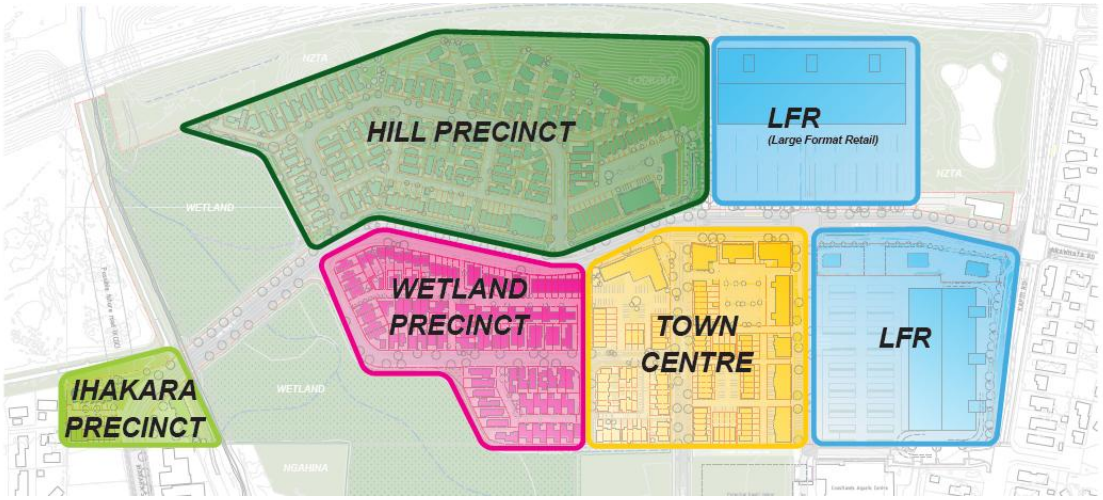


FIGURE 14: RESIDENTIAL PRECINCT PLAN (Source: Architects Design Statement)

531. The four precincts are described in detail below, drawing from the *Urban Design Statement* in **Appendix 5** and the *Architects Design Statement* in **Appendix 6B.**

HILL PRECINCT

532. The Hill Precinct occupies the northern part of the Site, adjoining the Kapiti Expressway, and extends south towards the Link Road and adjoining Wetland and Town Centre Precincts. It is predominantly residential, comprising standalone dwellings and terrace housing, together with some duplex dwellings and apartments towards the eastern interface with the Town Centre Precinct.

533. A key element of the Hill Precinct is the creation of a new landscaped western landform, following the removal of the western sand dune. The reconstructed hill will incorporate planting, pedestrian tracks and a lookout, while providing a landscaped buffer between the Kapiti Expressway and the residential neighbourhood.

534. The residential development includes a broad range of house and townhouse typologies, predominantly two storeys in height, with some three-storey terrace housing. Standalone dwellings generally comprise three- and four-bedroom homes, while the terrace housing provides a mix of two-, three- and four-bedroom accommodation. The architectural designs incorporate varied building forms, rooflines and materials, with housing typologies responding to the modified topography and differing site conditions.

535. The precinct is structured around an internal road and JOAL network, with standalone dwellings generally occupying the hillside areas and terrace housing defining the more compact residential streets and precinct edges. Buildings are orientated towards adjoining streets and open spaces, including the proposed wetland and swale network, providing opportunities for overlooking and passive surveillance.

536. Overall, the Hill Precinct will establish a varied residential neighbourhood that responds to the modified dune landscape, while providing a range of housing choices, landscaped open spaces and connections to the wider development.

WETLAND PRECINCT

537. The Wetland Precinct is located within the southern-central part of the Site and is framed by the proposed wetland compensation area, the central drainage swale and the Link Road. It is predominantly residential, comprising a mix of standalone dwellings, courtyard housing, duplex dwellings and terrace housing, with building forms and layouts designed to respond to the adjoining wetland and open space network.

538. A key feature of the precinct is its relationship with the proposed wetland complex, which will provide opportunities for recreation, pedestrian connections and outlook from adjoining dwellings. The residential layout has been designed to establish an active edge to these spaces, with dwellings orientated towards

the wetland and associated shared path network to provide overlooking and passive surveillance. Some dwellings will be positioned above the adjoining wetland on landscaped embankments, while others incorporate raised living areas or roof terraces to take advantage of views across the wetland.

539. The residential typologies are predominantly two storeys, with two- and three-storey terrace housing located towards the Link Road. Courtyard dwellings and duplex housing are incorporated within the internal blocks, with access provided through a network of local roads and JOALs.

540. Overall, the Wetland Precinct is intended to establish a residential neighbourhood closely integrated with the proposed wetland and open space network, providing a range of housing choices and opportunities for residents to access and overlook the adjoining naturalised landscape.

TOWN CENTRE PRECINCT

541. The Town Centre Precinct is an important component of the overall masterplan, given its location at the interface between the residential development and the large format retail (LFR) area, and its potential to provide a strong physical and functional connection with the existing Paraparaumu Town Centre.

542. The precinct is proposed as a higher-intensity mixed-use area, comprising purpose-designed apartment buildings (Types A3, A4 and A5), mixed-use buildings (Types M1, M2, M3, M4, M7 and M8) and terrace housing. The buildings provide a range of residential accommodation, including one-, two- and three-bedroom apartments, with retail, café, commercial and service activities incorporated at ground level within selected buildings. This mix of activities will provide an active and complementary interface with the adjoining LFR area, while transitioning in built form, scale and activity towards the predominantly residential parts of the Site.

543. Building heights and densities generally increase towards the intersection of the Link Road and Road 03, where the taller apartment and mixed-use buildings establish a focal point within the development. These include Building M1, which accommodates 45 apartments over ten storeys, and Building A4, which is seven storeys and incorporates ground-floor retail and café tenancies. The buildings incorporate a range of architectural forms and materials, with balconies, windows and pedestrian entrances addressing adjoining streets and public spaces.

544. The precinct has been designed around a walkable street and open space network, with residential activity above and alongside commercial uses contributing to street activation, overlooking and passive surveillance. Internal lanes provide access to parking and servicing areas, reducing the prominence of vehicle access along the principal street frontages.

545. The location of the precinct also provides significant opportunities for connectivity with the existing Paraparaumu Town Centre. In particular, the proposed Iver Trask Place extension would provide direct and convenient walking, cycling and vehicle connections between the Site, the LFR area and the existing town centre, supporting the integration of the Project with the wider metropolitan centre.

546. As noted by Lauren White in the Urban Design Assessment, the proposal seeks to establish *"a more street based and human scale retail experience as well as clearly defined and activated outdoor public open spaces."* This reflects the intended role of the Town Centre Precinct in providing a higher-density, mixed-use environment that complements and extends the existing Paraparaumu Town Centre.

IHAKARA PRECINCT

547. The Ihakara Precinct is located along the south-eastern edge of the Site, adjoining the existing residential, commercial and industrial activities along Ihakara Street. The Precinct provides a transition between these established activities and the proposed residential and mixed-use areas within New Central Park. Its layout and built form will respond to the adjoining urban environment while contributing to the wider integration and connectivity of the development.

7.5.2 HOUSING TYPOLOGIES

548. A range of housing typologies is proposed, comprising standalone dwellings, duplexes, courtyard housing, terrace housing and apartments. The mix of housing forms is intended to provide diversity in dwelling size, configuration and price point, accommodating a range of household types and housing needs.

549. There are 593 proposed dwellings that comprise 374 houses, townhouses, duplexes and courtyard houses and 219 apartments as follows:

- Townhouses: 186
- Standalone houses: 135
- Duplexes: 32
- Courtyard houses: 21
- Apartments: 219

550. The standalone, duplex and courtyard dwellings are predominantly located within the Hill and Wetland Precincts, with terrace housing distributed throughout all precincts. Apartments and mixed-use buildings are concentrated within the Town Centre Precinct and adjoining areas, where greater residential intensity can support the proposed commercial activities and wider town centre.

551. The *Urban Design Assessment* identifies the benefits of the proposed housing mix, noting that the development includes:

> *"a wide range of housing typologies and designs, inlcuding detached houses, duplexes, terraces, and apartments which delivers a range of pricepoints and lifestyle options for people overe time."*

552. The various housing typologies have been designed to respond to their respective locations, including the modified hillside, wetland interfaces, internal residential streets and more intensive mixed-use environment. The architectural designs incorporate variation in building footprints, heights, roof forms and materials, together with different arrangements for vehicle access, parking and private outdoor living areas.

553. Development plans, housing typology plans, block plans, architectural plans and associated schedules are provided in appendices 6 – 10.

APARTMENT AND MIXED-USE TYPOLOGIES

554. The residential component includes approximately 219 apartments accommodated within purpose-designed apartment buildings and mixed-use buildings, predominantly located within the Town Centre Precinct and at its interface with the Hill Precinct. Land use consent is sought through this application for the construction and use of these buildings.

555. The apartment buildings comprise a range of building forms and heights, including Buildings A1–A5, while the mixed-use buildings include Types M1–M4, M7 and M8. The mixed-use buildings incorporate residential apartments above ground-floor retail, café, commercial and other activities, providing opportunities for residential and commercial uses to be integrated within the same buildings. The apartments include a mix of one-, two- and three-bedroom configurations, with private balconies or terraces, communal circulation areas and associated parking and servicing facilities.

556. The location and design of the apartments reflect the overall urban design strategy, with greater residential intensity concentrated around key intersections, movement routes and public spaces. The taller buildings are generally located towards the Link Road and Road 03 intersection, where they reinforce the intended town centre focal point, while other apartment buildings provide activation and overlooking of adjoining streets and open spaces.

557. The *Urban Design Assessment* explains that the proposal clusters higher built forms and various uses around a centrally located public open space and along the Link Road and identifies that the mixed-use

buildings provide opportunities for apartments to be integrated with ground-floor commercial activities, contributing to an active street environment and supporting the wider town centre.

Ground Floor Commercial and Retail Tenancies

558. The mixed-use buildings and Apartment Building A4 incorporate a range of ground-floor retail, café and commercial tenancies intended to provide active frontages and contribute to the vibrancy of the Town Centre Precinct. The indicative tenancy sizes vary across the building typologies, providing flexibility to accommodate a range of commercial activities. The proposed tenancy areas are summarised in the **Table 8** below.

TABLE 8: GROUND FLOOR COMMERCIAL AND RETAIL TENANCIES

TYPOLOGY	TENANCY	PROPOSED ACTIVITY	GFA (M²)
Apartment A4	GF-C01	Retail / café	131
A4	GF-C02	Retail	75
A4	GF-C03	Retail	87
A4	GF-C04	Retail	87
A4 SUBTOTAL			**380**
Mixed Use M1	Tenancy 1	Commercial / retail	76.2
M1	Tenancy 2	Commercial / retail	64.6
M1	Tenancy 3	Commercial / retail	82.9
M1 SUBTOTAL			**223.7**
Mixed Use M2	R2	Retail	75.2
M2	R3	Retail	65.8
M2	R4	Retail	65.8
M2 SUBTOTAL			**206.8**
Mixed Use M3	Tenancy 1	Commercial / retail	77.7
M3	Tenancy 2	Commercial / retail	154.6
M3	Tenancy 3	Commercial / retail	77.7
M3 SUBTOTAL			**310**
Mixed Use M7	GF-01	Retail	198
Mixed Use M8	GF-01	Retail	176
M8 (two buildings	GF-02	Retail	176
M8 SUBTOTAL (PER BUILDING)			**352**

Future Unit Title Subdivisions

641. For subdivision purposes, the apartment and mixed-use buildings will initially be contained within larger development allotments or superlots. Unit title subdivision is not sought as part of this application. Instead, subsequent unit title subdivision applications will be progressed once the relevant buildings are sufficiently

advanced and the final unit configurations and associated common property arrangements have been confirmed.

642. This approach enables the buildings themselves, and the effects associated with their development and use, to be assessed and consented through this application, while retaining flexibility to finalise tenure and unit title arrangements at the appropriate stage of development.

7.5.3 HOUSE CONSTRUCTION

643. Land use consent is sought to commence the construction of residential dwellings prior to 224(c) certification. Therefore, as a technicality, resource consent is required for multiple dwellings on one Site.

644. The ability to construct dwellings prior to the issue of title has several advantages, including:

- Allowing housing construction to commence prior to title issuing allows the building process to be undertaken over a wider timeframe than if building was restricted until the issue of title. This is particularly significant from the perspective of building consent processing and resourcing, the availability of building supplies and resourcing and reducing the intensity of residential construction activity within the Site.

- Accelerating the delivery of these homes is also more in keeping with the purpose of the Act.

645. Construction of infrastructure within the development will be sufficiently advanced to adequately service the dwellings. A condition in the *Draft Consent Conditions* will require that a building location certificate is obtained for any dwelling seeking to be constructed prior to section 224c certification. The building location certificate will assist to allay concerns relating to the siting of the building relative to site boundaries.

7.5.4 ACOUSTIC PROTECTION OF DWELLINGS

646. The District Plan includes specific acoustic protection requirements for residential activities within the MCZ and for noise-sensitive activities located in proximity to the Kapiti Expressway. Rule NOISE-R14 requires relevant habitable rooms to achieve specified levels of façade sound insulation and mechanical ventilation, with more stringent sound insulation requirements applying to residential activities within 80m of a State Highway.

647. As the detailed design of individual dwellings and apartment buildings, including façade construction, glazing and ventilation systems, will be confirmed through subsequent design stages, compliance with these requirements will be demonstrated prior to building consent for the relevant building. The KCDC Draft Conditions include conditions that require the necessary certification to be provided by a Licensed Building Practitioner or suitably qualified acoustic engineer, as applicable. This approach is consistent with Marshall Day Acoustics' advice (refer **Appendix 12**) that detailed acoustic design is appropriately undertaken at the detailed design stage once the relevant building information is available.

7.6 LARGE FORMAT RETAIL

7.6.1 DEVELOPMENT FORM AND SCALE

648. The Project provides for approximately 20,000m² GFA of large format retail ('LFR') activities within the northern part of the Site, within lots 601 and 604 on either side of the proposed Town Centre Link Road. The LFR component forms a significant part of the commercial component of the Project and will contribute to the extension of the Paraparaumu Metropolitan Centre across the Site.

649. The LFR development is shown on the *Large Format Retail Plans* attached in **Appendix 10** and establish the proposed location, building footprints, bulk and scale, orientation and relationship of the LFR development with the Town Centre Link Road, adjoining commercial activities and surrounding public realm.

650. While discussions are ongoing with potential future occupiers and/or owners of the LFR sites, no particular LFR occupiers or operators have been confirmed at the time of lodgement. Accordingly, the application does not rely on, or seek consent for, a particular retailer or operator. Rather, the proposed building envelopes, bulk, scale and location establish the development parameters within which future LFR activities can be accommodated.

651. The final architectural treatment of the buildings will be developed within this approved envelope, with the proposed conditions providing for subsequent certification of matters including building elevations, materials and architectural treatment, landscaping and interfaces with the adjoining public realm.

7.6.2 LARGE FORMAT RETAIL ACTIVITY MIX AND ASSESSMENT ENVELOPE

652. Given that the ultimate LFR occupiers are not yet confirmed, the expert assessments supporting this application have adopted appropriate assumptions to enable the potential effects of the LFR component to be assessed without prescribing the ultimate operator mix.

653. For transport purposes, the *Integrated Transport Assessment* has assessed the 20,000m² LFR component on the basis of an indicative mix comprising 12,000 m² GFA of LFR within proposed Lot 601 and, within proposed Lot 604, 4,000 m² GFA of LFR together with a 4,000 m² supermarket. This is an assessment scenario used to test the transport effects of the LFR development rather than a prescribed allocation of particular activities or operators.

654. The ITA has deliberately adopted high trip-generating activities within that envelope. For the general LFR component, the upper end of Stantec's surveyed LFR trip-generation rates has been applied, while the assumed supermarket has been assessed using separate, higher supermarket-specific rates. This provides a conservative basis for assessing the transport effects associated with the future LFR activities.

655. The use of these conservative assumptions is intended to establish an effects envelope within which most reasonably foreseeable LFR operators and activity mixes could be accommodated without generating transport effects greater than those assessed as part of this application. This provides flexibility for the ultimate occupiers to be confirmed following consent, while ensuring that the potential effects of the LFR component have been appropriately assessed. The proposed consent conditions provide a mechanism for the final LFR activity mix and associated transport and servicing requirements to be confirmed against that assessed envelope, with any proposal that materially exceeds it requiring further assessment and, where necessary, a variation to the consent or separate resource consent.

7.6.3 ACCESS AND PARKING

656. The LFR development will be supported by dedicated customer parking and internal circulation areas, integrated with the wider Site movement network described in Section 7.9 below.

657. The Lot 601 LFR area on the western side of the Town Centre Link Road is proposed to have customer access associated with the first signalised intersection on the Link Road south of Kapiti Road. The Lot 604 retail area on the eastern side will be accessible through a combination of connections from the Link Road, the proposed east-west road network and Brett Ambler Way. These arrangements provide for traffic to be distributed between the available connections rather than relying on a single access point.

658. Customer parking will be provided within the LFR development areas as shown on the Architectural and Landscape Plans. The parking areas will incorporate pedestrian connections between the LFR buildings, adjoining activities and the wider walking and cycling network.

7.6.4 LOADING AND SERVICING

659. The LFR layout incorporates dedicated back-of-house servicing areas and rear service corridors to enable loading and servicing activities to occur separately from the principal customer parking and circulation areas.

660. Within Lot 601, service vehicles are proposed to enter from the Link Road via a dedicated service access, circulate to the rear of the LFR building and exit through a separate left-turn-only connection to the Link Road. Within Lot 604, servicing of the principal LFR and assumed supermarket activities is proposed from Brett Ambler Way, with service vehicles circulating through the rear servicing area and exiting via Road 2 towards the Link Road. Vehicle tracking has been undertaken to test these masterplan arrangements.

661. As the ultimate LFR operators are not yet known, the ITA has also considered servicing demands associated with relatively intensive LFR activities. This includes a large home-improvement retail activity and supermarket-type activity, thereby providing a basis for assessing the ability of the proposed layout and transport network to accommodate the anticipated range of service vehicles and delivery demands.

7.6.5 DETAILED DESIGN AND FUTURE OCCUPIERS

662. The proposed approach intentionally establishes the built form and effects envelope for the LFR component while retaining flexibility as to the particular retailers or operators that ultimately occupy the buildings.

663. The proposed *KCDC Consent Conditions* provide mechanisms for the subsequent confirmation and certification of detailed matters once the final LFR activities and operational requirements are known. These include the detailed architectural treatment of the buildings and their public interfaces, landscaping, and final transport, access, loading and servicing arrangements.

664. In particular, a *Large Format Retail – Transport and Servicing Confirmation Report* condition is proposed to confirm that the final LFR activity mix and associated traffic generation, access, loading and servicing requirements remain within the transport envelope assessed in the *Integrated Transport Assessment*. The assessment recognises that, if the eventual activity mix or development parameters materially change such that the assessed transport effects are exceeded, further assessment would be required.

665. This approach allows the final LFR development to respond to future commercial requirements without prematurely prescribing individual occupiers, while ensuring that the scale and form of development and the environmental effects for which consent is sought are appropriately defined and assessed through this application.

7.7 DRIVE THROUGH ACTIVITIES

666. The Proposal includes the establishment of three drive-through food and beverage activities in the northern part of the Site, adjoining the proposed Town Centre Link Road near its intersection with Kapiti Road.

667. The three activities are proposed to occupy a single site, with the building designs identifying a Starbucks café, Popeyes restaurant and Burger King restaurant. Each activity is proposed within a separate, purpose-built, single-storey building, with associated drive-through facilities, vehicle circulation areas, customer parking, pedestrian access and landscaping.

668. The indicative architectural designs illustrate contemporary commercial buildings incorporating glazed frontages, varied façade treatments, parapet detailing and individual branding. Landscaping is proposed along the road frontages and within the parking and circulation areas, including planted strips and individual trees to provide some visual separation between the buildings and adjoining roads.

669. The location alongside the Town Centre Link Road provides convenient access from the surrounding road network and integrates the activities with the wider mixed-use development.

670. The proposed site plan layout and building designs are provided in Appendix 11.

7.7.1 VEHICLE ACCESS, PARKING AND SERVICING

671. Vehicle access to the three drive-through activities will be provided from the Town Centre Link Road via a shared accessway along the southern side of the sites. Each activity will have dedicated drive-through lanes and queuing areas, together with off-street customer parking and pedestrian access to the buildings.

672. The internal circulation arrangements provide for vehicle ordering, collection and queuing within the sites. The *Integrated Transport Assessment* anticipates approximately four to six delivery vehicle visits per day for each activity, predominantly by small and medium rigid trucks. Servicing will be accommodated within the internal circulation and parking areas, with deliveries able to be scheduled outside peak trading periods where necessary.

7.7.2 LANDSCAPING

673. A 3 m wide landscape strip is proposed along the Kapiti Road and Town Centre Link Road frontages to soften the appearance of the buildings and integrate the activities with the wider streetscape. The indicative architectural renders do not reflect the full extent of landscaping proposed. A specific consent condition is proposed requiring detailed landscape plans for the three drive-through activities to be submitted to Council for certification prior to construction, to ensure appropriate planting and landscaping is provided along the road frontages and within the parking and circulation areas.

7.8 LANDSCAPING AND OPEN SPACE

7.8.1 LANDSCAPING AND OPEN SPACE

674. The Proposal incorporates a comprehensive landscape design prepared by DCM Urban Design, which integrates the proposed residential and commercial development with the road network, public open spaces, stormwater infrastructure and the wider Wharemaukū Stream corridor.

675. The proposed landscaping is illustrated in the *Open Space Strategy* and *Landscape Developed Design* prepared by DCM Urban Design, included as **Appendices 26A and 26B**. These plans establish the proposed landscape treatments, planting palettes, pedestrian connections, recreational facilities and fencing arrangements across the Site.

676. As outlined in the *Urban Design Assessment*, the landscape design has been developed alongside the overall masterplan to establish a connected network of streets, reserves and open spaces, while responding to the Site's topography, proposed built form and ecological and flood management requirements.

677. The key landscape components are described below.

7.8.2 STREETSCAPE AND ROAD LANDSCAPING

678. Landscaping is proposed throughout the internal road network, including street trees, planted berms, rain gardens and landscaped areas associated with pedestrian connections and intersections.

679. The proposed street tree strategy provides for a range of indigenous species, with planting selected having regard to the character and function of the different streets, available planting space and the relationship with adjoining residential and commercial development. Street trees and planting have also been selected having regard to the requirements of KCDC's Land Development Minimum Requirements (LDMR), with an emphasis on low-maintenance species that are suited to local growing conditions and will require minimal ongoing maintenance once established. Consideration has also been given to mature tree size, root growth and potential conflicts with underground services, footpaths and road infrastructure.

680. The Town Centre Link Road forms the principal east-west connection through the development and will incorporate street trees and landscaping alongside the proposed pedestrian and cycle facilities. Landscaping along the internal residential streets will provide a more localised character, with street trees and planted areas integrated with parking, vehicle crossings and footpaths.

681. Rain gardens and swales are also incorporated into the road network to provide stormwater treatment and conveyance, with planting selected to accommodate the operational requirements of these devices. Planting within these areas will comprise species suited to periodically wet and dry conditions, with consideration given to their establishment, long-term performance and maintenance requirements.

682. The landscape plans identify different surface treatments for footpaths, vehicle crossings and key pedestrian thresholds, including concrete, exposed aggregate and paving treatments. These will assist in distinguishing pedestrian areas and important connections within the development.

683. The final streetscape design, including planting locations, species selection and integration with underground services, vehicle access and sightlines, will be confirmed through detailed engineering and landscape design in accordance with the *KCDC Draft Conditions*.

7.8.3 PUBLIC RESERVES AND RECREATIONAL OPEN SPACE

684. The Proposal incorporates a network of open spaces and recreational areas distributed throughout the development and connected by the proposed pedestrian and cycle network. These spaces include a central plaza, neighbourhood playgrounds, landscaped reserves and pedestrian connections extending between the residential areas, commercial precincts and the wider wetland and stream corridor.

685. The central plaza is located within the mixed-use Town Centre Precinct and is intended to provide a focal point for the surrounding commercial and residential activities. It is proposed that this plaza form part of the road reserve vested with KCDC The landscape design incorporates hard and soft landscaping, pedestrian areas, seating and opportunities for informal gathering and social interaction. Two playground areas are also proposed, incorporating play equipment, seating, planting and associated pedestrian connections. These spaces will provide local recreational opportunities for residents and visitors and complement the wider open-space network.

686. The smaller reserves and pedestrian links will incorporate a combination of lawn, indigenous planting, trees and pedestrian paths, with seating and other facilities provided where appropriate. The proposed landscape palette includes a range of materials and furniture for use throughout the public realm, including benches, picnic tables, bicycle parking, bollards and different pathway surfaces. Together, these spaces will provide a variety of recreational opportunities, ranging from more formal urban spaces within the Town Centre Precinct to informal walking and passive recreation within the larger landscape areas.

7.8.4 WESTERN HILL / LANDFORM

687. The proposed new western landform adjoining the Kapiti Expressway will establish a landscaped hillside between the Expressway and the residential development. It is proposed that this reserve area be vested with KCDC.

688. The landscape design provides for varied slopes and rounded landform transitions, with indigenous planting intended to establish a naturalistic landscape character and provide a vegetated backdrop to the adjoining development.

689. Pedestrian connections are proposed through the hillside, including a walkway, steps and lookout areas. These will provide recreational opportunities and elevated views towards the surrounding area, including Kapiti Island.

690. Planting will be undertaken using the proposed dune and hill planting palette, with the final planting arrangement coordinated with the earthworks design and requirements for slope stability, establishment and ongoing maintenance.

691. The interfaces between the hillside and adjoining residential properties have also been considered in the landscape design, including the use of retaining structures, planting and fencing where necessary to accommodate changes in ground levels.

7.8.5 WETLAND AND WHAREMAUKŪ STREAM CORRIDOR

692. A substantial component of the proposed open-space network comprises a new indigenous wetland complex area and the Wharemaukū Stream corridor.

693. The proposed wetland complex area is described in detail in the *Draft Ecological Management Plan* in Appendix 29, which sets out the proposed wetland design, habitat types, planting, establishment, monitoring and ongoing management requirements. The *Draft Ecological Management Plan* is the primary document guiding the establishment and management of the wetland, with the landscape plans prepared by DCM Urban Design addressing its integration with the surrounding development, public open spaces and pedestrian network.

694. The *Open Space Strategy* and *Landscape Developed Design* illustrate the proposed pedestrian connections around the wetland and its interfaces with adjoining residential areas and public open spaces. These include pathways and boardwalk sections, together with seating and other landscape features where appropriate. The pathway network will connect with the wider development and Wharemaukū Stream corridor, providing opportunities for walking and passive recreation while maintaining separation from the principal wetland restoration areas.

695. The Wharemaukū Stream corridor will incorporate riparian planting and associated habitat enhancement works, as detailed in the *Ecological Management Plan*. These works will be integrated with the proposed pedestrian connections and adjoining open spaces, with the detailed stream restoration design and management to be addressed through the Wharemaukū Stream Restoration Management Plan required through the *GWRC Consent Conditions*.

696. The landscape design therefore focuses on the treatment of the public open spaces, pathways and interfaces surrounding the wetland and stream corridor, with the ecological restoration works undertaken in accordance with the *Draft Ecological Management Plan* and associated management plans required by the proposed conditions.

7.8.6 RESIDENTIAL ON-LOT LANDSCAPING

697. Landscaping is also proposed within the residential allotments, with the treatment varying according to the dwelling typology, lot configuration and relationship with adjoining streets and open spaces.

698. The *Landscape Developed Design* illustrates indicative on-lot planting arrangements for the proposed standalone houses, duplexes, terraces and other residential typologies. These include planted frontages, private outdoor living areas, hedging, specimen trees and planting along internal boundaries.

699. The landscaping has been designed to provide a balance between private residential amenity and an attractive public street frontage. Front gardens and planted edges will contribute to the streetscape, while planting and fencing around private outdoor living areas will provide separation and privacy where required.

700. The landscape plans also identify arrangements for screening individual bin storage areas where these are visible from public spaces.

701. The final on-lot landscape treatments will be confirmed through the Private On-Lot Landscape Planting Plans required under the proposed KCDC consent conditions. These plans will be prepared for the relevant residential lots and will be generally consistent with the planting palettes and design principles illustrated in the Landscape Developed Design, while allowing for refinement of planting arrangements and species selection through detailed design.

7.8.7 COMMERCIAL AND MIXED-USE LANDSCAPING

702. Landscaping within the commercial and mixed-use areas will be integrated with building frontages, pedestrian areas, car parking, servicing and the adjoining road network.

703. Within the Town Centre Precinct, the landscape treatment will be more urban in character, incorporating paving, street trees, planted areas and public seating to support pedestrian activity and the relationship between buildings and the central plaza.

704. The large format retail area will incorporate landscaping within the car parking areas and along relevant site boundaries, including the Kapiti Road frontage. Planting and landscape screening will be used where appropriate to soften the appearance of parking and servicing areas and improve the interface with adjoining public spaces.

705. The detailed design of these areas will be coordinated with the final architectural and landscape plans for the commercial buildings required to be certified under the *KCDC Draft Conditions*.

7.8.8 FENCING AND BOUNDARY TREATMENTS

706. The proposed fencing strategy has been developed alongside the landscape and architectural design to provide for residential privacy and security while maintaining appropriate visual connections with streets and public open spaces.

707. The *Landscape Developed Design* illustrates a range of boundary treatments, including timber paling and permeable slat fencing, post and mesh fencing, low walls, raised planters and retaining structures.

708. Lower or visually permeable fencing is generally proposed along street frontages and boundaries adjoining public open spaces, wetlands, swales and pedestrian connections to maintain visibility and opportunities for passive surveillance. More solid fencing, generally between 1.5m and 1.8m high, is proposed where privacy and screening are required, particularly along internal and rear residential boundaries.

709. Fencing and retaining structures along the western hillside will be integrated with the landscape design, with visually permeable treatments used where appropriate. Security fencing will also be provided where access needs to be controlled.

710. Final fencing locations, heights and materials will be confirmed through detailed design, generally consistent with the Landscape Developed Design and as required by the proposed landscape conditions in the *KCDC Draft Conditions*.

7.9 SUBDIVISION

711. The proposed subdivision seeks to establish residential, apartment, mixed-use and commercial allotments, together with roads, walkways and reserves to vest with KCDC, jointly owned access lots (JOALs), shared private open spaces and land required for the proposed stormwater and flood.

712. The proposed subdivision is illustrated on the *Scheme Plans* prepared by Spencer Holmes and attached in Appendix 23 with the associated easement and amalgamation schedules provided in Appendix 24.

713. Overall, the subdivision comprises:

- 358 residential allotments (Lots 1–358) to accommodate the proposed standalone houses, duplexes, townhouses and courtyard houses.
- Five allotments (Lots 401–405) intended for future residential unit title development, including apartments and other higher-density residential forms.
- Seven allotments (Lots 501–507) intended for future mixed-use unit title development, accommodating residential and commercial activities.
- Four allotments (Lots 601–604) to accommodate the proposed large format retail, specialty retail and other commercial activities.
- Lots 2000–2015 to vest in KCDC as road, together with the future road stage over Iver Trask Place.

- Lots 901–906 to vest in KCDC as walkways.
- Lots 907–910 to vest in KCDC as reserves. Lots 908 and 910 accommodate the proposed wetland compensation areas, while Lots 907 and 909 accommodate the Wharemaukū Stream corridor and associated wetland buffer areas.
- Jointly owned access lots (JOALs): Lots 1000–1018 to provide shared access to residential and future residential/mixed-use developments. Lots 1004 and 1013 extend over parts of the proposed wetland areas.
- Easements in gross for public access purposes in favour of KCDC over all JOALs (Lots 1000–1018) and Area G within Lot 401.
- Eight easement areas (Areas A–H) providing access between identified residential and future development allotments.
- Land to be held and managed through residents' association arrangements, including private parks and limited areas of the batters adjoining the proposed wetlands, where private access to the shared path is provided from the adjacent residential lots.
- Amalgamation conditions, restrictive covenants, and party wall, overhang and service easements as required to support the proposed development.

7.9.1 RESIDENTIAL, APARTMENT AND MIXED-USE ALLOTMENTS

714. The subdivision includes the creation of 370 residential and future residential/mixed-use development allotments, comprising 358 residential allotments (Lots 1–358), five allotments for future residential unit title developments (Lots 401–405) and seven allotments for future mixed-use unit title developments (Lots 501–507).

715. Lots 1–358 will accommodate the proposed standalone houses, duplexes, townhouses and courtyard houses. These allotments are distributed throughout the residential neighbourhoods and are arranged around the proposed internal road network, shared access lots and open spaces.

716. Lots 401–405 will be subject to future unit title subdivision to enable individual ownership of the apartments within the proposed apartment buildings. Similarly, Lots 501–507 will be subject to future unit title subdivision to enable individual ownership of the residential apartments and commercial units within the proposed mixed-use buildings, together with associated common property.

7.9.2 COMMERCIAL ALLOTMENTS

717. The subdivision establishes four commercial allotments (Lots 601–604) to accommodate the proposed large format retail, specialty retail and other commercial activities.

718. These allotments are located towards Kapiti Road and Brett Ambler Way, with access provided from the proposed internal road network.

7.9.3 ROADS AND WALKWAYS TO VEST

719. The subdivision includes the creation of the Link Road and local roads to provide access to the proposed residential and commercial development. Lots 2000–2015 are proposed to vest in KCDC as road, together with the future road stage over Iver Trask Place.

720. The road network will provide connections throughout the development and to the surrounding transport network, including Kapiti Road and Brett Ambler Way. The roads will accommodate vehicle movements, pedestrian and cycle facilities, parking, landscaping and underground services, as applicable.

721. The subdivision also provides for Lots 901–906 to vest in KCDC as walkways. These allotments form part of the wider pedestrian network, providing connections between the residential neighbourhoods, roads, open spaces and other destinations within the development.

722. In addition to the roads and walkways proposed to vest, public access will be provided over the privately owned JOALs through easements in gross in favour of KCDC, as described below.

7.9.4 JOINTLY OWNED ACCESS LOTS AND PUBLIC ACCESS EASEMENTS

723. The subdivision includes the create of 19 JOALs, being Lots 1000–1018, which will remain in private ownership and be held in undivided shares by the allotments they serve, as detailed in the Spencer Holmes Amalgamation and Shares of Access Lots Schedule in **Appendix 24.**

724. Lots 1004 and 1013 comprise small areas of the proposed wetland batters where private access is provided from adjoining residential lots down to the shared walkway.

725. Easements in gross for public access purposes are proposed over Lots 1000–1018 in favour of KCDC, as detailed in the Easement Schedule in **Appendix 24.**

726. An additional public access easement in gross is proposed over Area G within Lot 401, providing public access through the future residential development allotment.

7.9.5 RESERVES, WETLAND AREAS AND SHARED PRIVATE OPEN SPACE

727. The subdivision also seeks to create of reserves associated with the proposed wetland complex, Wharemaukū Stream corridor, flood management infrastructure and wider open-space network.

728. The subdivision includes the following reserves to vest in KCDC:

- Lot 900 – lookout reserve: The hilltop lookout and planted hillside.
- Lots 901–906 – walkway reserves: Walkways providing pedestrian connections between the residential areas, roads and open spaces.
- Lots 907 and 909 – drainage reserves: The Wharemaukū Stream corridor and wetland buffer areas, including the proposed shared path.
- Lots 908 and 910 – scenic reserves: The proposed wetland compensation areas on either side of the Link Road, comprising the wetland offset area.

729. The subdivision also includes shared private open spaces, including private parks to be held and managed through residents' association arrangements.

730. Lots 1004 and 1013 comprise small areas of the wetland batters where private access is proposed from adjoining residential lots to the shared path. These lots will remain in private ownership, with public access easements in gross in favour of KCDC.

731. In addition to the land proposed to vest, the subdivision includes shared private open spaces intended to be held and managed through residents' association arrangements. These include private parks and land associated with the batters adjoining the proposed wetland areas.

7.9.6 EASEMENTS, AMALGAMATION AND OTHER LEGAL ARRANGEMENTS

732. The subdivision includes the creation of easements, amalgamation conditions and other legal arrangements required to provide access, servicing and ongoing management of the development.

AMALGAMATION ARRANGEMENTS

733. The proposed Amalgamation and Shares of Access Lots Schedule identifies the undivided shareholding arrangements for Lots 1000–1018.

734. The schedule provides for the JOALs to be held in undivided shares by the allotments they serve, including the allocation of multiple shares to certain future residential and mixed-use development allotments.

OTHER EASEMENTS AND COVENANTS

735. The Easement Schedule also identifies Areas I–L as proposed restrictive covenants.

736. Party wall and overhang easements will be established where required to accommodate the proposed attached residential buildings, subject to final design.

737. Service easements will be confirmed following construction and as-built surveying of the relevant infrastructure. Easements may also be limited in height where necessary.

7.9.7 DEVELOPMENT / SUBDIVISION STAGING

738. The subdivision plans identify 38 indicative stages across the Site, providing for the progressive development staging generally as follows:

- **Stages 1–5:** Commercial development areas towards Kapiti Road.
- **Stages 6–8:** Northern residential and mixed-use development areas.
- **Stages 9–20:** Western and central residential neighbourhoods.
- **Stage 21:** Southern section of the Link Road between the proposed wetland areas.
- **Stages 22–23:** Proposed wetland compensation areas.
- **Stages 24–26:** Southern road connection and development adjoining Ihakara Street.
- **Stages 27–37:** Remaining central and eastern residential and mixed-use development areas.
- **Stage 38:** North-western area adjoining the Kapiti Expressway.

739. The staging shown on the subdivision plans is shown as indicative only and is not intended to prescribe the order in which the development must proceed. Stages may be undertaken individually, combined or developed in a different sequence, depending on construction programming, market demand and infrastructure delivery.

740. Each stage will be required to have appropriate legal access and servicing arrangements in place, with the timing of key infrastructure, stormwater and flood management works, and wetland compensation works addressed in the *KCDC Consent Conditions.*

741. The timing and delivery of the proposed Iver Trask connection will be confirmed through further discussions with KCDC, who will largely be responsible for delivering this connection. Accordingly, its construction is not necessarily tied to the indicative subdivision staging shown on the plans. The consent conditions contemplate this and establish conditions around provision of a temporary pedestrian and cycle connection before the full formed connection is completed.

7.9.8 INFORMATION REQUIREMENTS IN AN APPLICATION FOR SUBDIVISION OR RECLAMATION – SCHED 5, CL8

742. Section 43(3)(a), Clause 8 of Schedule 5 sets out the information required for subdivision or reclamation. An assessment of the proposal against the subdivision requirements is provided in **Table 9** below.

TABLE 9: SUBDIVISION INFORMATION REQUIREMENTS (Clause 8 of Schedule 5)

INFORMATION REQUIREMENT	ASSESSMENT
(1)(a) The position of all new boundaries	The proposed subdivision boundaries are shown on the Scheme Plans in **Appendix 23**.
(1)(b) The areas of all new allotments, unless the subdivision involves a cross lease, company lease, or unit plan	The area of each proposed allotment is identified on the Scheme Plans in **Appendix 23.**
(1)(c) The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	The proposed reserves are identified on Scheme Plans in **Appendix 23**. These include Lot 900 (hill lookout), Lots 901–906 (walkway reserves), Lots 907 and 909 (drainage reserves accommodating the Wharemaukū Stream corridor, wetland buffers and shared path), and Lots 908 and 910 (scenic reserves accommodating the proposed wetland compensation areas).
(1)(d) The locations and areas of existing esplanade reserves, esplanade strips, and access strips	The subdivision plans identify the existing property boundaries and adjoining land, including the Wharemaukū Stream corridor. No existing esplanade reserves, esplanade strips or access strips are proposed.
(1)(e) The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991	No separate vesting of a river or lake bed under section 237A of the RMA is proposed. The Wharemaukū Stream corridor is included within the proposed drainage reserve allotments (Lots 907 and 909) to vest in KCDC.
(1)(f) The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991	Not applicable. The Site is not located within the coastal marine area.
(1)(g) The locations and areas of land to be set aside as new roads	Lots 2000–2015 are proposed to vest in KCDC as road, together with the future road stage over Iver Trask Place. The locations, boundaries and areas of the proposed road allotments are shown on the Scheme Plans in **Appendix 23.**

7.10 INFRASTRUCTURE

760. The proposed three waters and utility servicing arrangements have been developed by the Project engineers and are addressed in the *Civil Infrastructure Report*, *Stormwater Management Plan* and *Flood Risk Assessment*, provided in appendices 13-15. Collectively, these assessments together with the *Drainage Plans* in **Appendix 21** and water supply plans in **Appendix 22** illustrate the proposed water supply, wastewater and stormwater servicing of the Project, including the management of stormwater quality and quantity and flood risk, together with the provision of other utility services.

761. The proposed servicing arrangements are summarised in the sections below.

7.10.1 WASTEWATER

762. As detailed in the *Civil Infrastructure Report*, HAL Consulting Limited (HAL) conducted an analysis for KCDC to understand existing capacity constraints in the wastewater network and the impact that the previously proposed development would have on the wastewater network. This modelling was undertaken as part of the previous resource consent process and has been reviewed to determine its applicability to the current development proposal.

763. The HAL report (based on previous development plans) has assumed a peak wastewater flow (PWWF) of 58.9l/s.

764. The current proposal has a lower overall wastewater design demand than the development assessed by HAL in 2024. Based on the proposed land-use there is a reduced number of dwellings, and a reduced

area of commercial buildings. Based on this Envelope have calculated a PWWF of 32.6l/s, significantly less than the previous design.

765. Based on previous communications with KCDC wastewater engineers, it was agreed that the best solution for the wider network was to pump back to the Rata Road pump station.

766. The HAL report identified that the scenario above (pumping to Rata St PS, noted as Option 2 in the report) would result in minor upstream surcharging during heavy rain events with the proposed development added to the existing network. HAL do however note that there is sufficient storage to prevent any unacceptable risk of uncontrolled overflows during the modelled 5yr rain event. Under a future 2043 scenario (modelled with assumed other future developments as well as the earlier 58.9l/s development) HAL noted that while there were no overflows predicted, the level of surcharge is considered to pose an unacceptable risk.

767. Based on this Envelope conclude that the proposed development can be accommodated by the existing network. This conclusion is conservative in the context of the previous HAL modelling, given that the current calculated PWWF of 32.6l/s is substantially lower than the 58.9l/s assessed in that modelling. However, it would be prudent to consider network upgrades, particularly where the network passes through the site, that improve network capacity. Several options are available including additional storage within the proposed new pump station to limit peak flows as well as upgrades to existing pipe infrastructure.

768. Envelope also understand that KCDC are already progressing the design of upgrades for the Rata Road pump station.

769. Based on the modelling, and as further described in the *Civil Infrastructure Report*, the proposed wastewater infrastructure for the development consists of the following:

- Gravity network, falling to a centralised vested pump station in the centre of the site.
- The pump station will pipe wastewater using a rising main to the Rata Road pump station, subject to KCDC gaining landowner approvals for the larger rising main renewal. If these approvals are not granted, there are secondary options to connect into Ihakara Street.
- Lots on the southeast of the link road, will connect directly into the proposed gravity network.
- Lots on the northwest side of the channel will require localised pump stations discharging to the proposed gravity network. A gravity connection has been considered for these areas but is not considered practicable, as it would require wastewater pipelines to pass beneath the channel at significant depth. This would result in deep infrastructure within an area of high groundwater and associated construction, groundwater management and maintenance constraints. The proposed pumped solution avoids the need for these deep channel crossings while allowing the remainder of the development to be serviced through the centralised gravity network. Gravity is not suitable for these lots as the wastewater pipes would need to go under the channel and the depth and potential groundwater issues would be challenging to construct.
- Lots connecting onto Ihakara Street will connect into the proposed gravity network fronting onto these lots.

7.10.2 POTABLE WATER

770. As further described in the *Civil Infrastructure Report*, the proposed wastewater infrastructure for the development consists of the following:

- A 300mm ID water main connecting to the existing 350mm ID water mains on Kapiti Road and Rimu Road.
- 150mm ID water main connections from the proposed 300mm ID water main to existing water mains on Ihakara Street and Iver Trask Place.

- 100mm ID water main connection from the existing 350mm ID water main on Kapiti Road, if this is required by future modelling.

- Dual water mains of varying sizes (typically 100 – 150mm) will be run on opposite sides of the roads to the main reticulation network to provide water supply on both sides of the proposed roads.

On behalf of KCDC, Stantec has undertaken water supply modelling to assess the capacity of the existing network to accommodate the proposed development. As detailed in Section 8.3 of the *Civil Infrastructure Report,* the modelling confirms that the development is expected to have a minor impact on the existing network under both current peak-day and future demand scenarios. The proposed network also provides sufficient pressure, flow and resilience to meet potable water and firefighting requirements.

The modelling identified potential firefighting resilience constraints where only an initial portion of the proposed network is constructed in isolation. However, Envelope outline that the bulk of the proposed water network will be constructed together, providing the connectivity necessary to address this constraint. Final pipe sizing, connections and any associated staging requirements will be confirmed through detailed engineering design in accordance with KCDC requirements and as set out in the *Draft Consent Conditions*.

7.10.3 STORMWATER MANAGEMENT

771. The Proposal includes the construction of a new stormwater management system to service the proposed residential and commercial development and associated road network. A *Stormwater Management Plan* has been prepared by Envelope Engineering and is included in Appendix 14. The assessment outlines the proposed approach to stormwater conveyance, hydraulic neutrality, stormwater treatment, flood management and integration with the proposed wetland compensation complex.

772. The stormwater management strategy has been developed having regard to the Site's existing drainage characteristics, ground conditions, groundwater, flood hazards and the receiving environment of the Wharemaukū Stream. The strategy incorporates Water Sensitive Urban Design principles and has been informed by the supporting flood modelling, hydrological and ecological assessments.

773. The key components of the proposed stormwater management system are outlined below.

STORMWATER CONVEYANCE

774. As outlined in Section 12 of the *Stormwater Management Plan*, a new piped stormwater network will be established to collect and convey runoff from the proposed development.

775. The primary stormwater network will be designed to accommodate flows up to and including the 10% Annual Exceedance Probability (AEP) event (1-in-10-year event). Stormwater will be collected through catchpits located at low points and regular intervals along the proposed roads and conveyed through underground pipes to outlets within the constructed wetland and swale areas.

776. A secondary stormwater network will also be provided to manage runoff during larger rainfall events. This will comprise road corridors and designated overland flow paths, which will convey flows associated with the 1% AEP event (1-in-100-year event) towards the proposed flood management areas.

777. The proposed primary and secondary drainage arrangements are illustrated on the drainage plans in Appendix 19. The final location and sizing of the stormwater infrastructure will be confirmed through detailed design, with the necessary plans and calculations submitted to KCDC and, GWRC in accordance with the Draft Consent Conditions.

HYDRAULIC NEUTRALITY AND STORMWATER ATTENUATION

778. The Project will increase the extent of impervious surfaces across the Site through the construction of buildings, roads, parking areas and other infrastructure. Stormwater attenuation measures are therefore proposed to manage the resulting changes in runoff and achieve hydraulic neutrality.

779. As outlined in Section 11 of the *Stormwater Management Plan*, Envelope Engineering has undertaken hydrological modelling using HEC-HMS to assess pre-development and post-development runoff conditions. The modelling identifies that, without stormwater controls (i.e. mitigation), the development would result in increases in peak stormwater flows of approximately 20%.

780. The proposed attenuation approach primarily comprises soakage devices located within selected development catchments. Soakage has been identified as a feasible solution, particularly following the proposed ground improvement earthworks, which will replace existing low-permeability materials like peat with more permeable sand. The proposed soakage measures will also contribute to groundwater recharge as further set out in the *Hydrology Effects Assessment*.

781. The preliminary design has adopted a factored soakage rate of 1,000mm/hr, based on Envelope Engineering's experience with developments in the surrounding area. The assessment identifies that soakage is likely to be suitable within the southern and central catchments, but less suitable within the commercial catchments adjoining Kapiti Road due to higher groundwater levels.

782. The HEC-HMS modelling demonstrates that hydraulic neutrality of peak flows can be achieved through the proposed attenuation measures for the 2-, 5-, 10- and 100-year rainfall events. The measures have been designed across the development catchments, with soakage provided in selected locations to offset runoff from other areas where individual attenuation devices are not proposed.

783. The final location, sizing and configuration of soakage devices will be confirmed through detailed design, following site-specific soakage testing undertaken after ground improvement works. This will include consideration of seasonal groundwater levels and the required separation between the base of soakage devices and the design groundwater level.

784. The SMP also identifies that alternative attenuation measures may be adopted where soakage is not reasonably practicable, provided that the required hydraulic neutrality outcomes are achieved.

785. This approach is considered appropriate and is consistent with the usual process for the design and approval of stormwater infrastructure for developments of this nature and scale. The *Stormwater Management Plan* establishes the proposed attenuation strategy and demonstrates that hydraulic neutrality can be achieved, while recognising that the final design of individual devices will depend on detailed engineering design. It is not unusual for the precise location, sizing and configuration of stormwater devices to be confirmed through the Engineering Approval process, subject to consent conditions requiring the necessary performance standards to be achieved as is the case in the draft consent conditions included in this application. This provides flexibility in the final design without altering the requirement to achieve hydraulic neutrality.

7.10.4 RAINWATER STORAGE AND RE-USE

786. Section 15.7 of the *Stormwater Management Plan* considers rainwater harvesting as part of the assessment of Water Sensitive Urban Design options. While on-lot rainwater harvesting is identified as potentially suitable, it has not been adopted as a necessary component of the proposed stormwater management strategy, with Envelope Engineering identifying that volumetric control is better achieved through soakage.

787. The assessment further explains that the WWLA hydrological modelling demonstrates that passive soakage through the proposed rain gardens enables post-development baseflows within the Wharemaukū Stream to closely match existing conditions. On this basis, Envelope Engineering concludes that rainwater collection and re-use is not necessary to achieve the proposed stormwater management outcomes.

    Accordingly, the Proposal does not include rainwater storage tanks. Instead, stormwater runoff will be managed through the proposed soakage, attenuation and treatment measures, which have been designed to achieve hydraulic neutrality, maintain groundwater recharge and manage stormwater quality. While the District Plan includes requirements for rainwater storage, the proposed alternative approach achieves the relevant stormwater management outcomes without reliance on individual rainwater tanks.

STORMWATER TREATMENT AND WATER SENSITIVE URBAN DESIGN

788. The proposed stormwater management system incorporates a Water Sensitive Urban Design approach, with measures intended to manage contaminants generated by the development, provide for groundwater recharge and minimise the discharge of untreated stormwater to the receiving environment.

789. As outlined in Section 15 of the *Stormwater Management Plan*, the proposed stormwater treatment approach principally comprises streetscape bioretention rain gardens, passive soakage and restrictions on contaminant-generating building materials.

Bioretention Raingardens

790. Bioretention rain gardens are proposed within the future road network to provide treatment of stormwater runoff from road surfaces. The Stormwater Management Plan identifies Filterra units as the proposed treatment devices, enabling the required treatment efficiency to be achieved within a more confined filter media area. Where standard bioretention devices are used, these will be designed in accordance with Wellington Water's *Water Sensitive Design for Stormwater: Treatment Device Design Guideline* (2019), based on a treatment area equivalent to 2% of the contributing road impervious area.

791. The rain gardens will provide treatment of contaminants associated with road runoff, including suspended solids, metals and nutrients. The *Stormwater Management Plan* identifies anticipated contaminant removal performance based on the Wellington Water design guidelines.

792. Passive soakage through the base of the rain gardens will also be incorporated to provide hydrological control and contribute to groundwater recharge.

Passive Soakage and Groundwater Recharge

793. As outlined in Section 15.11 of the *Stormwater Management Plan*, the proposed stormwater management approach includes passive soakage measures intended to maintain groundwater recharge and support baseflows within the Wharemaukū Stream.

794. The WWLA hydrological modelling detailed in the *Hydrology Effects Assessment* has incorporated retention of the first 20mm of rainfall from road areas through passive soakage associated with the proposed rain gardens. This modelling indicates that the proposed measures will enable post-development stream baseflow conditions to closely match existing conditions.

795. Together, Envelope Engineering and WWLA confirm that soakage is likely to be feasible across the majority of the Site following ground improvement. Where full soakage is not feasible, passive soakage beneath rain gardens is proposed to provide the hydrological control assumed in the WWLA assessment.

796. The final design of the rain gardens and passive soakage arrangements will be confirmed through detailed design, including verification of infiltration performance and consideration of groundwater levels.

Building Material Restrictions

797. The Proposal also includes restrictions on the use of untreated or unsealed copper and zinc building materials, including roofing elements, flashings and downpipes, to reduce the potential for these contaminants to enter the stormwater system. These restrictions are addressed through the proposed consent conditions.

798. FLOOD MANAGEMENT

799. The Proposal includes earthworks, landform modification and dedicated flood storage areas to manage the existing flood hazards affecting the Site and surrounding catchment. The lower-lying areas of the Site currently provide significant flood storage during larger storm events, with flooding also occurring along existing drainage channels and within localised depressions.

800. As outlined in Section 10 of the *Stormwater Management Plan* and detailed in the *Flood Risk Assessment*, the proposed development incorporates approximately 26,000m³ of additional flood storage during the 100-year ARI event. The modelled available flood storage volume increases from approximately 106,000m³ under existing conditions to 132,000m³ following development, notwithstanding the filling of existing low-lying areas to accommodate development.

801. The proposed wetland compensation complex adjoining the Wharemaukū Stream has been designed primarily to provide ecological compensation, while also serving a secondary function of providing flood storage. The arrangement of proposed ground levels, flood storage areas and overland flow paths has been informed by hydraulic modelling of the existing and proposed development scenarios, allowing these functions to be integrated within the overall wetland design. The proposed wetland and adjoining flood management areas will accommodate floodwaters displaced from other parts of the Site, together with flows from the wider catchment.

802. The *Flood Risk Assessment* identifies that the proposed works can accommodate the changes associated with development without materially increasing flood risk on surrounding properties, with reductions in flood levels predicted around Rimu Road, Ihakara Street and parts of the adjoining residential and commercial areas. Some localised increases in flood depths are predicted downstream, although these are generally within the adopted modelling tolerance.

803. The flood management arrangements are supported by the proposed secondary stormwater network, which will direct larger stormwater flows through designated overland flow paths and road corridors towards the flood management areas.

INTEGRATION WITH THE WETLAND COMPLEX

804. As outlined in Section 14 of the *Stormwater Management Plan*, the wetland has been designed to provide a range of wetland habitats while also accommodating flood storage within the wider Wharemaukū Stream catchment. The preliminary wetland design has been informed by the ecological requirements identified by Bioresearches, hydrological modelling undertaken by WWLA and hydraulic assessments prepared by Envelope Engineering. These investigations have informed the proposed wetland levels, surface water supply arrangements, groundwater interactions and anticipated frequency and duration of inundation.

805. The wetland design incorporates different vegetation and habitat zones intended to accommodate varying hydrological conditions, ranging from permanently wet areas through to areas subject to periodic inundation during larger rainfall and flood events.

806. The *Stormwater Management Plan* identifies that post-development groundwater levels are generally predicted to be at or within approximately 0.5m of the proposed finished ground surface across the wetland compensation area. These conditions, together with the proposed surface water inflows, are intended to support the establishment and ongoing functioning of the proposed wetland habitats.

807. The design also incorporates measures to manage sedimentation and reduce the need for intrusive maintenance within established wetland habitats. These include a bund separating the wetland compensation area from the main Wharemaukū Stream channel and a sediment forebay to intercept coarser sediment and gross pollutants before they enter the wetland.

808. Ongoing ecological management, hydrological monitoring and maintenance will be undertaken in accordance with the proposed ecological management and monitoring programme.

7.10.5 FLOOD HAZARD MITIGATION AND MANAGEMENT

809. As outlined in Section 6 above, the development of the Site requires an integrated approach to earthworks, stormwater conveyance and flood storage. Without appropriate mitigation, filling of existing flood storage areas and changes to drainage patterns could displace floodwaters and increase flooding on adjoining land.

810. Accordingly, the Proposal incorporates substantial earthworks and associated stormwater and flood management infrastructure to address these constraints. The proposed approach involves reconfiguring

the existing landform to establish suitable development platforms, roads and infrastructure, while consolidating flood storage within the proposed wetland complex adjoining the Wharemaukū Stream.

811. Proposed flood management measures include:

- Raising and reshaping parts of the Site to accommodate development, with changes to existing flood storage and conveyance accounted for in the overall design.
- Utilising the wetland complex for flood storage to accommodate floodwaters displaced from other parts of the Site and flows from the wider catchment.
- Providing a network of swales and stormwater infrastructure to convey flows through the Site and maintain connections with the wider drainage network.
- Establishing defined drainage and overland flow paths through the proposed road network and open spaces, directing floodwaters towards the proposed flood management areas.
- Establishing development platforms and finished floor levels with appropriate freeboard above modelled flood levels.

812. This approach is consistent with the MCZ Structure Plan, which anticipates a consolidated flood management area as part of the development of the Site, including provision for flood storage, ecological and amenity functions.

7.10.6 FLOOD MODELLING

813. The *Flood Risk Assessment* uses the updated Wharemaukū catchment hydraulic model provided by KCDC in June 2026, which has been refined using site-specific topographical survey information and updates to the existing drainage network.

814. The model has then been modified to represent the proposed development, including the finished ground levels, primary and secondary stormwater networks, swales, culverts, wetland and flood management areas, and changes to land use and surface roughness.

815. The modelling also incorporates flood protection measures for the adjoining Lot 2 DP 470759 (the Ngahina Block), comprising a protection bund and drainage pipes fitted with flap valves. Although the future Airport Link Road does not form part of the Proposal, its potential landform has also been included in the modelling to ensure that the flood management design does not preclude this future connection.

816. The assessment compares existing and proposed development scenarios for the 10-year and 100-year ARI events, including climate change allowances. The assessment considers changes in flood depths, levels, extents, flows, velocities and flood hazard classifications within the Site and surrounding catchment.

Modelled Flood Management Outcomes

817. The modelling demonstrates that the proposed earthworks and flood management infrastructure will substantially change the distribution of flooding across the Site. Floodwaters will be largely directed towards the proposed wetland complex and defined drainage corridors, rather than extending across the proposed residential and commercial development areas.

818. The assessment identifies that:

- The Proposal will not result in a net loss of flood storage, with approximately 26,000m³ of additional modelled flood storage provided during the 100-year ARI event.
- The proposed residential and commercial areas and most of the road network will achieve an H1 flood hazard classification, with isolated areas of H2 hazard at localised low points.

- Higher flood hazards will be concentrated within the proposed wetland and flood management areas, where deeper flooding is anticipated.

- Peak flows along parts of the Wharemaukū Stream adjoining the Site will reduce, together with flood depths in some surrounding areas, including around Rimu Road and Ihakara Street.

- Localised increases in flood depths of approximately 7–21mm are predicted at several downstream locations during the 100-year ARI event. These are within the adopted 25mm modelling tolerance and are not considered by Envelope Engineering to represent a material change in flood conditions.

819. Overall, the modelling indicates that the proposed flood management approach can accommodate the development while maintaining or improving existing flood management functions and avoiding material increases in flood risk to surrounding properties and infrastructure. The FRA identifies some localised changes requiring further investigation, particularly around the Coastlands Aquatic Centre pond.

820. Further modelling will be undertaken at the Engineering Approval stage to confirm the performance of the final design, including ground levels, culverts, and stormwater infrastructure and flood storage arrangements,

DETAILED DESIGN AND IMPLEMENTATION OF STORMWATER MANAGEMENT MEASURES AND DEVICES

821. The stormwater management strategy establishes the proposed approach to stormwater conveyance, attenuation, water quality treatment, flood management and groundwater recharge for the development.

822. As identified in the *Stormwater Management Plan*, further detailed design will be undertaken to confirm the final sizing and configuration of stormwater infrastructure, including verification of soakage performance following ground improvement works, the design of the primary and secondary drainage networks, stormwater treatment devices and associated discharge structures.

823. The detailed design will be undertaken in accordance with the proposed consent conditions and applicable engineering requirements, with the necessary plans and calculations submitted to KCDC and, where required, GWRC through the relevant approval processes.

7.10.7 UTILITIES

824. Envelope has previously engaged with the Telecommunications, Power and Gas Network Utility Operators (Chorus, Scanpower and Firstgas) who have confirmed that they have network adjacent to the site and that this can be extended to serve the proposed development.

825. With respect to electricity, Aurecon has estimated a total demand of approximately 7.2 MVA for the full development. Scanpower, on behalf of Electra, has confirmed that the existing network can currently accommodate approximately 1.0 MVA from Kapiti Road and a further 2.0 MVA from Ihakara Road. Additional network upgrades will therefore be required to accommodate the full development demand. As outlined in the Civil Infrastructure Report, the existing available capacity is sufficient to support initial development, with the timing and extent of subsequent upgrades to be confirmed with the network operator as development progresses.

826. Firstgas has confirmed that its existing network adjacent to the Site can be extended to service the development, with capacity to provide up to 16,000 MJ/hr without significant network upgrades.

827. The alignments, connections and any necessary network upgrades to be confirmed during detailed design in consultation with the relevant network utility operators.

7.11 ACCESS AND TRANSPORT

828. The proposed access and transport arrangements are described in detail in the *Integrated Transport* Assessment prepared by Stantec and provided in **Appendix 22.** The assessment outlines the proposed

connections to the surrounding transport network, internal road hierarchy, walking and cycling infrastructure, public transport provision, parking, servicing, traffic generation, intersection performance and road safety.

7.11.1 SITE ACCESS AND CONNECTIONS

829. The principal vehicle connection through the Site will be provided by the new Town Centre Link Road (Road 1). The Link Road will extend from the existing Kapiti Road/Arawhata Road signalised intersection, where it will form a new fourth arm to the intersection, south through the Site to connect with the existing Ihakara Street termination. The Link Road forms a key component of the Project and will provide access to the development while also providing a new connection through the wider town centre network.

830. The proposed movement network also provides for new east-west connections (being proposed roads 2 and 3) between the Link Road and the existing town centre network at Iver Trask Place and Brett Ambler Way, consistent with the desired connector roads identified in the MCZ Structure Plan.

INTERNAL ROADING NETWORK

831. The Project includes a hierarchy of public roads and private access arrangements designed to provide a legible and connected movement network through the Site. The public roads comprise:

- Road 1 – Town Centre Link Road, which performs the principal movement function through the Site;
- Roads 2 and 3 – Iver Trask Place and Brett Ambler Way extensions, providing east-west connectivity; and
- Roads 4, 5 and 6, which provide access to the residential development areas.

832. These roads are proposed to vest in KCDC. A series of private Jointly Owned Access Lots ('JOALs') are also proposed to provide shared access within the residential areas.

833. The road hierarchy and street typologies have been developed having regard to the MCZ Structure Plan, KCDC's Land Development Minimum Requirements, NZS 4404 and the principles of the One Network Framework. Further detail is provided in Section 9 of the *Integrated Transport Assessment*.

FUTURE IHAKARA EXTENTION / AIRPORT LINK ROAD

834. The MCZ Structure Plan identifies a notional extension of Ihakara Street towards Kiwi Road and the transport network west of the Kapiti Expressway, referred to in the *Integrated Transport Assessment* as the Ihakara Street Extension/Airport Link Road.

835. As described in Section 4.2 of the assessment, the Applicant and KCDC have been discussing options for accommodating this future connection for several years, including potential alignments through the Site. However, the alignment previously preferred by KCDC has proved difficult to accommodate given the environmental constraints associated with the Wharemaukū Stream and proposed wetland restoration and flood management areas.

836. Accordingly, the future connection is being considered through a separate workstream between the Applicant KCDC and NZTA, including investigation of an alignment generally south of the Wharemaukū Stream in line with the indicative alignment in the MCZ Structure Plan. The detailed alignment, design, consenting requirements, delivery arrangements and timing remain to be determined through that separate process.

837. Importantly, the project traffic engineers confirm that the proposed development does not rely on the future Ihakara Street Extension/Airport Link Road to provide access to the Site or accommodate the traffic demands generated by the proposal. The *Integrated Transport Assessment* demonstrates that the

proposed transport network can appropriately accommodate the anticipated traffic demands without this connection.

838. Accordingly, consenting and construction of the Airport Link Road does not form part of the proposal and can appropriately be investigated and delivered through a separate process without compromising the transport outcomes of the proposed development. The proposal has nevertheless been designed so as not to preclude its future establishment, including provision for a future connection to the proposed internal road network.

7.11.2 MULTI-MODAL NETWORK

839. Walking and cycling infrastructure is integrated throughout the proposed movement network. The Town Centre Link Road will include dedicated on-road cycle lanes in both directions, an off-road shared path along its western side and a separate footpath along its eastern side. Roads 2 and 3 will also incorporate shared paths and footpaths, while the local residential roads will provide footpaths on both sides.

840. The proposed network will connect with existing walking and cycling infrastructure surrounding the Site, including along Kapiti Road and the Wharemaukū Stream corridor. Signal-controlled crossings will be provided at the principal signalised intersections, together with additional crossing opportunities along the Link Road.

7.11.3 PUBLIC TRANSPORT

841. The Town Centre Link Road has been designed so as not to preclude the future extension of scheduled bus services through the Site. Provision has been made for two indicative bus stops, one in each direction, located close to the core retail and commercial activities and surrounding residential catchment.

842. The roading plans have been provided to GWRC/Metlink for review, with ongoing engagement anticipated regarding the detailed provision for a potential future bus route, including bus stop locations and associated infrastructure.

7.11.4 VEHICLE PARKING

843. Parking will be provided throughout the development through a combination of on-site parking associated with individual activities and kerbside parking incorporated within relevant road typologies.

844. The LFR and commercial areas will include dedicated customer parking, while residential parking will be provided in association with the individual residential typologies. Further details of the proposed parking arrangements are provided in the assessment.

7.11.5 COMMERCIAL AND LARGE FORMAT RETAIL ACCESS AND SERVICING

845. The proposed commercial and LFR areas have been designed to accommodate customer access, parking, loading and servicing requirements while managing their interaction with the wider movement network.

846. The principal retail areas will be accessed from the Link Road and adjoining east-west road network through a combination of signalised and priority-controlled access points. Outside the principal retail areas, individual direct lot access from the Link Road is generally avoided, with access instead provided from the lower-order road network.

847. The masterplan incorporates dedicated rear servicing corridors for the principal LFR and retail activities, enabling loading and servicing to occur separately from the main customer parking and circulation areas. Vehicle tracking has been undertaken to confirm the ability of the proposed network and service areas to accommodate anticipated service vehicles, with final access, loading and circulation arrangements to be confirmed through detailed design.

848. The final LFR activity mix and associated transport, loading and servicing requirements will also be confirmed in accordance with the proposed *KCDC Consent Conditions.*

7.11.6 RESIDENTIAL ACCESS AND SERVICING

849. Residential development will be accessed from the proposed public road network and private JOALs. The JOALs provide shared access to groups of residential lots and have been designed as lower-speed environments with pedestrians and vehicles sharing the movement space.

850. Residential waste collection will occur through a combination of kerbside collection and on-site collection, depending on the particular residential typology and access arrangement. The proposed roading plans have been provided to Waste Management, a refuse collection contractor operating in the Kapiti Coast District, who has confirmed that the internal roading layout is satisfactory from a refuse collection perspective. Detailed waste collection arrangements for relevant JOAL-served development will be confirmed through the subsequent design process.

7.11.7 INTERSECTION DESIGN AND ROAD SAFETY

851. The proposed intersections have been located and designed having regard to network permeability, traffic efficiency, active-mode movements and road safety. Signalised intersections are proposed where higher traffic volumes and turning demands warrant them, including at the Kapiti Road/Arawhata Road/Link Road intersection and the principal internal Link Road intersection.

852. The road layout has been refined through engagement with KCDC. This has included rationalising an earlier intersection adjacent to the LFR area near Kapiti Road to provide greater separation from the Kapiti Road intersection. Detailed intersection design will continue to be refined through the subsequent engineering design and road safety assessment processes.

7.12 EARTHWORKS

7.12.1 GENERAL EARTHWORKS DETAILS

853. As outlined in Section 3 of the *Infrastructure Report*, Envelope Engineering prepared the earthworks design for a previous iteration of the proposal and was actively involved in the associated resource consent applications to KCDC and GWRC.

854. Bulk earthworks are proposed over a total area of 33ha. The earthworks will provide for the creation of the wetland offset area, creation of building platforms clear of flood levels and with suitable ground conditions, form the roads and facilitate flood storage areas.

855. Plans of the earthworks are provided within Appendix 19 with the proposed methodology set out in the Earthworks and Construction Management Plan (Appendix 16).

856. The proposed earthworks consists of the following:

- Comparing existing surface levels and proposed surface levels, the volume change is 363,000m^3 of cut and 272,000m^3 of fill. When allowing for compaction of the fill material and import of gravels to build the road this approximately balanced. However, to achieve this, additional earthworks are required to remove unsuitable organic soils from under the proposed roads and building areas and replace these soils with sand.

- Top surface strip and unsuitable undercut from lower levels, total volume of 426,000 m^3 and sand volume of 162,000 m^3 to for re-use. A further 162,000m^3 will be sorted and conditioned to allow re-use as fill (a total of 324,000m^3), leaving a net 257,000m^3 of peat.

- Sand cut volume of 307,500 m^3 and fill volume of 674,000m^3 (including sorted undercut material) to finished levels.

- Topsoil and peat respread volume of 87,000 m^3.
- A maximum cut height of 13.5 m which is located within the existing sand dune. The typical cut depth is substantially less than this.
- A maximum fill depth of 10.5 m which is located in the proposed dune location. The typical fill height is substantially less than this.
- The undercut material will be sorted once excavated. Clean sand can be re-used as fill. Sand with minor topsoil/organic content may be able to be re-used subject to geotechnical advice and monitoring. We understand that some cement stabilisation can be incorporated to improve the re-useability of this excavated material.
- There is approximately 170,000 m^3 of potentially unsuitable material that requires further geotechnical review prior to either placement on-site or removal from site. Quantities to be removed will be minimised wherever possible either by treatment or undercut and placement within the site.

857. A maximum cut height of 13.6m is proposed, with a maximum fill depth of 12.5m reforming the dune to a similar elevation, but slightly west of the existing location. The reconstruction of the western dune will include shaping the dune form in an irregular manner and planting with appropriate species from the ' Dune-Land' category under the Kapiti District Endemic Flora Species List (2012).

858. Overall, the proposed earthworks approach reflects a suitable response to the site's geotechnical and topographical constraints. It is anticipated that the final design and management of earthworks can be appropriately addressed through the Fast-track consent application, including the development of supporting management plans to ensure that associated effects are appropriately avoided, remedied, or mitigated.

7.12.2 GEOTECHNICAL CONSIDERATIONS

859. The *Geotechnical Assessment Report* attached in **Appendix 21** has considered the ground conditions across the Site and the geotechnical requirements associated with the proposed bulk earthworks, including the removal and reuse of existing soils, formation of building platforms and roads, and stability of the proposed landforms.

860. As outlined in Sections 7.4 and 7.5 of the *Geotechnical Assessment Report*, the proposed earthworks methodology has been informed by the presence of peat, organic sands and clean dune sands across the Site. In particular:

- **Removal of unsuitable material:** Fibrous peat and unsuitable organic soils will be undercut beneath building platforms, roads and associated infrastructure and replaced with engineered fill. Topsoil and fibrous peat will be used for landscaping and landform construction, including the proposed Lookout adjoining the Expressway, rather than as structural fill.
- **Reuse of excavated material:** The existing dune sands will provide a significant source of engineered fill for the development. Torlesse anticipates that more than 90% of material sourced from the dunes will be suitable for reuse, while clean sands are considered fully reusable. Organic sands may also be reused as engineered fill, subject to their organic content and appropriate treatment or blending with clean sands.
- **Engineered fill and settlement:** The earthworks will establish suitable ground conditions for future buildings and infrastructure. Torlesse recommends trial compaction pads and settlement monitoring platforms to confirm the suitability of different fill materials, appropriate compaction methods and acceptable organic content, with the objective of minimising long-term settlement.
- **Slope stability:** Torlesse has assessed the stability of the proposed stormwater swale, temporary excavations adjoining the Expressway, the reconstructed western landform and the road causeway across the wetland area. The assessments indicate that the relevant stability requirements can be achieved, subject to the recommended engineering measures and detailed design.

- **Groundwater management:** Shallow groundwater will need to be managed during excavation and placement of engineered fill. Temporary groundwater control and subsoil drainage will be incorporated where required, with particular consideration given to areas of elevated perched groundwater adjoining the Expressway.

861. Torlesse recommends that the detailed earthworks methodology be further developed through pre-construction trials, material testing and geotechnical input during construction. This will include confirming the suitability of excavated materials for reuse, the required extent of undercutting, compaction specifications, temporary and permanent batter arrangements, and groundwater control measures.

862. Overall, the geotechnical investigations demonstrate that the proposed earthworks can be undertaken using established engineering methods, with the reuse of suitable material from within the Site forming an important component of the earthworks strategy. A detailed assessment of geotechnical hazards and associated effects is provided in **Section 11** of this Application.

863. The recommendations of Torlesse will be incorporated into the detailed engineering design and construction methodology for the Proposal. This will include further geotechnical investigation where required, confirmation of ground improvement and foundation requirements, pre-construction compaction and settlement trials, and geotechnical testing and monitoring during earthworks. These requirements will be addressed through the proposed consent conditions, with building-specific foundation design undertaken at the relevant building consent stage.

7.12.3 EROSION AND SEDIMENT CONTROL

864. As detailed in the *draft Earthworks and Construction Management Plan* provided in **Appendix 16**, a comprehensive suite of erosion and sediment control measures is proposed to manage sediment generation and discharge during earthworks.

865. The proposed approach includes:

- Staging and sequencing of earthworks to minimise the extent and duration of exposed ground, with completed areas progressively stabilised;
- Use of clean-water diversions to prevent uncontaminated runoff entering active earthworks areas;
- Treatment of sediment-laden runoff through Sediment Retention Ponds (SRPs), Decanting Earth Bunds (DEBs), silt fences and other perimeter controls, with additional controls used where required adjacent to sensitive receiving environments;
- Specific controls for earthworks adjacent to Wharemaukū Stream and the proposed wetland, including progressive stabilisation and limiting the extent of unstabilised works immediately adjacent to the Stream;
- Use of stabilised construction entrances and road-cleaning measures to prevent sediment being tracked onto the surrounding road network;
- Stabilisation of stockpiles and disturbed areas using temporary or permanent measures as works progress; and
- Regular inspection, monitoring and maintenance of erosion and sediment controls, including additional inspections following significant rainfall events.

866. The erosion and sediment control measures will be designed and implemented in accordance with the relevant GWRC erosion and sediment control guidance. The draft ECMP establishes the overall management approach, with final detailed erosion and sediment control plans to be prepared for the relevant stages of works in accordance with the proposed GWRC consent conditions.

Wharemaukū Stream – Construction Water Quality Monitoring

867. As set out in the ESCP, water quality monitoring will be undertaken within the Wharemaukū Stream during construction to assess the effectiveness of the proposed controls and identify any sediment-related effects associated with earthworks.

868. The monitoring =will include baseline monitoring prior to the commencement of earthworks, together with ongoing monitoring at representative locations upstream and downstream of the works. This will enable changes in water quality to be assessed having regard to existing conditions within the Stream, including natural variations associated with rainfall and stream flows.

869. The monitoring programme will provide for:

- Baseline water quality measurements prior to construction, particularly turbidity and other relevant indicators of sediment discharge;
- Regular upstream and downstream monitoring during earthworks, with increased monitoring during higher-risk activities adjacent to the Stream;
- Additional inspections and monitoring following significant rainfall events or where sediment discharges are suspected;
- Monitoring of relevant water quality parameters, including pH where construction activities present a risk of alkaline discharges;
- Investigation and corrective action where monitoring identifies potential construction-related deterioration in water quality; and
- Recording and reporting of monitoring results, incidents and any corrective actions undertaken.

870. The detailed monitoring locations, frequency, parameters and response triggers will be confirmed through the ECMP, having regard to the proposed construction methodology, staging and relevant GWRC requirements.

871. This monitoring will provide an additional means of verifying the effectiveness of erosion and sediment controls throughout construction, with the programme continuing as necessary until the relevant earthworks areas have been stabilised and the risk of sediment discharge has been appropriately managed.

7.12.4 TEMPORARY BORE CONSTRUCTION AND WATER TAKE

872. The construction of a temporary shallow water bore is proposed to contribute towards the water supply required for dust control. The bore will only be used when other sources are not available, with the likely maximum extraction rates from the bore to be in the order of 1L/s.

873. The location of the proposed bore will be confirmed by the contractor, however will be centrally located on the site to avoid any adverse effects on nearby properties. It is anticipated that the bore will be located approximately 300-500m from any other existing bore.

874. The bore will be constructed in accordance with NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock and upon completion of the earthworks on the site, will be decommissioned.

7.13 ECOLOGY

7.13.1 WATERCOURSE AND STREAM WORKS

875. The proposal includes works affecting the artificial drainage network within the Site, together with works in proximity to and associated with crossings of the Wharemaukū Stream. In particular, the proposal includes:

- filling of Drains 1–4;
- piping of approximately 290m of the upper extent of Watercourse 1;
- realignment of the remaining approximately 550m of Watercourse 1 through the Site, comprising:
  - approximately 300m within an open swale; and
  - approximately 250m through the proposed constructed biodiversity wetland within the western part of the Site;
- earthworks and vegetation clearance within 8m of the Wharemaukū Stream; and
- localised works associated with the proposed crossings of the Wharemaukū Stream.

876. As detailed in the Assessment of Ecological Effects, Watercourse 1 has been assessed as an artificial drain.

PROPOSED CULVERTS AND FISH PASSAGE

877. The Proposal includes the construction of new culverts, extension of an existing culvert and removal of several existing drainage structures associated with the Wharemaukū Stream, Watercourse 1, the proposed swale network and wetland complex. The works are required to accommodate the proposed road network, maintain stormwater conveyance and provide hydraulic connectivity between the proposed wetland areas. The location of the proposed culverts is shown on the Culvert Location Plan prepared by Envelope Engineering (refer Appendix 19A).

878. The proposed culvert works are summarised in Table 10 below.

TABLE 10: CULVERT DETAILS

CULVERT / LOCATION	SIZE	PROPOSED WORKS
NCP Land: Existing culvert by pond	900mm diameter	Remove
NCP Land: Existing culvert along track	1,200mm diameter	Remove
NCP Land: Existing culvert along track and drain	1,500mm diameter	Remove
NCP Land: Existing culvert along drain	1,500mm diameter	Remove
NCP Land: Existing culvert at end of drain	Unknown	Remove
Culvert F – Expressway	1,050mm diameter	Retain
Culvert A – Wharemaukū Stream	4.0m × 1.5m box	Construct
Culverts A2 and A3 – Wharemaukū Stream	2.0m × 1.5m box each	Construct
Culvert B – Wetland connection	3.0m × 1.5m box	Construct
Culverts B2 and B3 – Wetland connection	2.0m × 1.5m box each	Construct
Culvert C – Watercourse 1 / swale	2.0m × 1.5m box	Construct

TABLE 10: CULVERT DETAILS		
CULVERT / LOCATION	SIZE	PROPOSED WORKS
Culvert D – Watercourse 1 / swale	1,600mm diameter	Construct
Culvert E – Adjacent to NZTA land	1,050mm diameter	Construct
Culvert H – Existing drainage crossing	1,800mm diameter	Extend existing culvert
Culvert J – Wharemaukū Stream	Twin 1,350mm diameter pipes	Construct
Culvert K – Watercourse 1 / swale	1,050mm diameter	Construct

931. Culverts A, A2 and A3 form a combined crossing of the Wharemaukū Stream approximately 32.5m long, while Culvert J comprises a twin-barrel crossing approximately 34m long. These structures are required to accommodate the proposed road network and maintain stream conveyance. Culverts A and J will incorporate concrete headwalls at their inlets and outlets, with scour protection provided where required.

932. Culverts B comprises twin culvers (B2 and B3) and are located beneath the proposed Link Road between the two areas of the wetland compensation complex. The central 3.0m wide box culvert is intended to provide for fish passage and hydraulic connectivity between the wetland areas, with the adjoining culverts providing additional flow conveyance capacity.

933. Culverts C, D and K are associated with Watercourse 1 (being an artificial drain) and the proposed swale network, while Culvert E is located beneath the proposed bund adjoining the NZTA land. These structures will maintain drainage conveyance beneath the proposed roads and earthworks. Culvert H involves a minor extension of the existing 1,800mm diameter culvert near Brett Ambler Way, with the existing drainage and fish passage functions to be maintained.

934. The proposed culverts have been considered in relation to freshwater fish passage. Culverts A and J are located within the Wharemaukū Stream and are therefore subject to the relevant riverbed and fish passage provisions of the NRP and NES-F. Watercourse 1 has been assessed by the project ecologist as an artificial farm drain rather than a river under the RMA. Accordingly, the riverbed culvert provisions of the NRP and NES-F are not considered to apply to the culverts associated with that watercourse. Culvert B is similarly located within the proposed wetland compensation complex rather than an existing riverbed.

935. Notwithstanding these distinctions, the culverts have been considered against Regulation 42 of the Freshwater Fisheries Regulations 1983 and the relevant provisions of the FTAA. The proposed crossings have generally been designed to not impede fish passage.

936. The final culvert alignments, levels, gradients, embedment, hydraulic performance and inlet and outlet arrangements will be confirmed through detailed design. The associated resource consent requirements are addressed in Section 11 below and Appendix 2 – Statutory Assessment.

7.13.2 WHAREMAUKŪ STREAM ENHANCEMENT

937. As outlined in the Executive Summary, earlier iterations of the Proposal involved the reclamation and realignment of the Wharemaukū Stream through the proposed wetland area. During the processing of those applications, KCDC and GWRC raised extensive technical queries and concerns regarding the proposed diversion, particularly in relation to sediment management, the establishment and stability of the new channel, flood conveyance and ongoing maintenance. These matters were the subject of numerous requests for further information and contributed to the reconsideration of the proposed approach.

938. While the Wharemaukū Stream is currently highly modified and channelised, its appearance should not be taken as an indication that it lacks ecological value. To the contrary, the assessments undertaken by Bioresearches confirm that the stream reach within the Site provides important freshwater habitat. The

Applicant considers that these existing values warrant protection and enhancement, rather than the abandonment of the existing watercourse in favour of a new channel through the proposed wetland.

939. As set out in Section 6.3.7.5 of the *Assessment of Ecological Effects*, the current Proposal retains the Wharemaukū Stream on its existing alignment, with no reclamation or diversion proposed except for proposed culverts for the Town Centre Link Road and Iver Trask Extension. Works affecting the stream itself include those required for the proposed crossings, together with ecological enhancement works and associated earthworks within the adjoining riparian margins.

940. Importantly, the retention of the existing channel does not mean that the stream and proposed wetland will function as separate or disconnected environments. The wetland has been designed to incorporate low-flow channels and hydrological connections with the Wharemaukū Stream, creating an interconnected freshwater environment. The adjoining wetland, riparian restoration and stream enhancement works are intended to function together, providing greater habitat diversity, ecological connectivity and opportunities for freshwater species movement.

941. While this approach does not achieve the realignment of the Wharemaukū Stream through the wetland sought by Te Ātiawa ki Whakarongotai, it seeks to achieve many of the associated ecological and restoration outcomes through a connected wetland and stream system. In this respect, the Proposal represents a balance between retaining and improving the Stream's existing ecological values, maintaining its flood conveyance function and establishing a substantially more naturalised freshwater environment across the southern part of the Site.

942. The proposed enhancement works have the objective of improving freshwater habitat and the ecological function and value of the Stream. As detailed in the Assessment of Ecological Effects, these works will include:

- Extensive indigenous riparian planting to replace existing pasture grasses and weed species and improve shading, temperature regulation, bank stability and aquatic habitat;
- Placement of boulders, root wads and large woody material to increase habitat diversity and provide refuge for freshwater fish and macroinvertebrates;
- Localised channel widening and creation of shallow pools, riffles and cobble habitat to provide greater variation in stream depth, flow and habitat conditions, including opportunities for fish spawning; and
- Targeted planting close to the stream edge to strengthen the connection between terrestrial and aquatic habitats and provide additional bank and in-stream habitat.

943. The majority of the in-stream enhancement works will be concentrated along the true right bank adjoining the proposed biodiversity wetland, with targeted enhancement also undertaken along the true left bank. Riparian planting will accommodate ongoing flood management and channel maintenance, with denser woody vegetation along the true right bank and predominantly lower-growing, disturbance-tolerant species along the true left bank, interspersed with clusters of taller planting. Channel maintenance will also seek to retain variation in the streambed profile, including pools and riffles, where practicable.

944. As outlined in the *Ecological Management Plan*, riparian restoration will be undertaken progressively, including initial establishment of pioneer species followed by enrichment planting. The programme will include ongoing weed and pest management, maintenance, monitoring and replacement planting to support the successful establishment of indigenous vegetation.

945. The detailed design and implementation of the enhancement works will be guided by the *Ecological Management Plan* and further developed through the proposed Wharemaukū Stream Restoration Management Plan, as required by the GWRC Draft Conditions. This will include opportunities for mana whenua input into the final restoration design, species selection and ongoing management.

946. Overall, the Applicant's approach is not to retain the existing channel in its modified state, but to improve its ecological condition and reconnect it with a substantially larger and more diverse freshwater environment. The proposed works seek to achieve meaningful restoration of the Wharemaukū Stream

and its adjoining wetland habitats, while retaining the existing watercourse and its important flood conveyance function.

Consistency with the 2016 Wharemaukū Stream Freshwater Ecological Baseline Study

947. In 2016, Jacobs prepared the *Wharemauku Stream Freshwater Ecological Baseline Study* on behalf of KCDC. The study assessed the ecological condition of the Wharemaukū Stream and identified opportunities to improve freshwater habitat and ecological function. This report is provided in **Appendix 32**.

948. The study recognised that the Stream had been substantially modified through urban development and flood management works, including channel straightening, deepening and vegetation clearance. Nevertheless, it identified that the Stream continued to support indigenous freshwater fish species and retained important ecological values.

949. Of particular relevance, Section 4.4.1 recognises the need to maintain the existing flood channel for flood conveyance while recommending improvements to the low-flow channel through the introduction of pools, riffles, boulders and woody material. The study also recommends indigenous riparian planting, improved maintenance practices and ongoing ecological monitoring.

950. The Proposal is closely aligned with these recommendations. As outlined above, the existing Stream will be retained and enhanced through targeted in-stream habitat improvements and riparian restoration, while maintaining its flood conveyance function. The adjoining biodiversity wetland, including its low-flow channels and connections with the Stream, will further contribute to freshwater habitat diversity and ecological connectivity.

951. Overall, the proposed approach is consistent with the findings and recommendations of the Jacobs study commissioned by KCDC in 2016. Importantly, the study supports the approach of achieving meaningful ecological improvements within the existing channel, rather than requiring realignment of the Stream to achieve restoration outcomes.

FURTHER ENGAGEMENT ON STREAM PROPOSAL

952. The Applicant acknowledges that Te Ātiawa has expressed a preference for greater naturalisation of the Wharemaukū Stream, including consideration of its realignment through the proposed wetland complex. Further engagement with Te Ātiawa, KCDC and GWRC is proposed to discuss the stream enhancement measures and opportunities to strengthen the restoration outcomes.

7.13.3 WETLAND RECLAMATION AND CONSIDERATION OF AVOIDANCE

PROPOSED WETLAND RECLAMATION

953. The Proposal involves the reclamation of nine natural inland wetlands identified across the Site, comprising approximately 5.33ha of predominantly exotic pastoral wetland habitat. The location and extent of these wetlands are shown on Figure 1 of the *Assessment of Ecological Effects* in **Appendix 27.**

954. The existing wetlands are distributed across the low-lying parts of the Site, including areas proposed for residential and commercial development, the internal road network and associated infrastructure, and the southern area proposed for wetland creation and flood storage.

955. The full extent of the existing wetlands has been accounted for as wetland loss. This includes portions located within the proposed new wetland compex, where earthworks are required to establish the finished wetland levels and accommodate the secondary flood storage function. Although these areas will remain within a wetland environment following development, the existing habitats will be modified and have therefore been conservatively treated as fully reclaimed for the purposes of the ecological effects assessment and compensation calculations.

7.13.4 CONSIDERATION OF WETLAND AVOIDANCE

956. Avoidance of adverse effects on natural inland wetlands is the first step of the effects management hierarchy under the NPS-FM, the NES-F and the NRP.

957. Policy 6 of the NPS-FM provides that there is to be no further loss of extent of natural inland wetlands, that their values are protected and their restoration promoted. The effects management hierarchy in clause 3.21 requires that:

> *"adverse effects are avoided where practicable"*

958. Where avoidance is not practicable, the hierarchy provides for the management of effects through minimisation, remediation and, where necessary, aquatic offsetting and compensation. Regulation 45C of the NES-F provides a consenting pathway for certain urban development activities affecting natural inland wetlands, with the relevant requirements including consideration of practicable alternative locations and application of the effects management hierarchy. Similarly, Policy P31 of the NRP requires the avoidance of Schedule F ecosystems and habitats in the first instance, subject to the provisions of that policy, and otherwise establishes an effects management hierarchy that requires adverse effects to be avoided where practicable before progressing to minimisation, remediation, offsetting and compensation.

959. The Project has been subject to a comprehensive masterplanning process involving civil engineering, geotechnical, hydrological, ecological, transport, landscape and urban design considerations. As part of this process, the practicability of retaining the existing wetlands has been considered in the following technical assessments:

- Envelope Engineering – Engineering Wetland and Dune Avoidance Memorandum attached as Appendix 16A
- Urban Acumen – Urban Design Avoidance Assessment, appended to the Urban Design Statement (Appendix 5).

960. These assessments identify several interrelated constraints that have informed the proposed development layout and the extent to which wetland loss can practicably be avoided.

Distribution and Fragmentation of Existing Wetlands

961. A key consideration identified by Envelope is the fragmented distribution of the existing wetlands. Rather than forming a single consolidated area that could readily be retained, the wetlands are dispersed across much of the flatter land within the Site.

962. The majority of the wetland extent occurs within areas identified for residential development on the Metropolitan Centre Zone Structure Plan, with further wetlands located within or adjoining the proposed Link Road, Iver Trask Place extension, Kapiti Road commercial and large format retail area, and land required for drainage and flood management.

963. Refer Figure 15 below that illustrates the existing wetlands in relation to the MCZ Structure Plan and the proposed masterplan development.



FIGURE 15: WETLANDS IN RELATION TO MASTERPLAN AND MCZ STRUCTURE PLAN

964. Envelope identifies that avoiding these wetlands collectively would require the road and development network to be configured around numerous separate wetland areas, while still accommodating the necessary connections, development levels, servicing infrastructure and flood management requirements.

965. Furthermore, the surrounding development will generally require filling and drainage works that may alter the shallow groundwater and surface water conditions supporting retained wetlands. Envelope therefore identifies that physical retention of individual wetland footprints would not necessarily maintain their existing hydrological and ecological functions.

966. Accordingly, avoidance has been considered not only in terms of retaining individual wetland footprints, but also whether those wetlands could continue to function within the developed environment.

Roading and Infrastructure Requirements

967. The proposed road network has been informed by the MCZ Structure Plan, including the Link Road between Kapiti Road and Ihakara Street and connections to Iver Trask Place and Brett Ambler Way. Importantly, the delivery of the Link Road has already been agreed between KCDC and NCPL, with a caveat registered against the Record of Title to secure its provision. The Link Road is therefore an established requirement for the development of the Site, rather than simply a proposed connection identified through the current masterplanning process.

968. Section 3.3.2 of Envelope's memorandum explains that the location and design of these roads are constrained by the required external connection points, intersection arrangements, road geometry, existing ground levels, flood management and servicing requirements.

969. Of particular relevance, Envelope's preliminary assessment identifies that approximately 4.1ha of existing wetland would be affected by construction of the principal road connections alone, including areas directly affected by construction and those affected through severance, fragmentation or associated hydrological changes. This does not include the additional effects associated with adjoining residential and commercial development.

970. In this regard, the construction footprint extends beyond the road carriageways themselves, reflecting the need to excavate unsuitable peat and organic material, establish suitable road formation levels and construct associated batters.

971. While alternative alignments are technically possible, Envelope identifies that relocating individual road sections would have consequential implications for adjoining intersections, development platforms, servicing infrastructure and drainage. Given the fragmented distribution of wetlands across the Site and the wider earthworks and development requirements, alternative road alignments would not necessarily enable the ongoing retention and functioning of existing wetlands or achieve a material reduction in wetland loss when the consequential changes to adjoining development and infrastructure are taken into account.

Residential and Commercial Development

972. The implications of retaining the existing wetlands have also been considered by Urban Acumen in its Urban Design Avoidance Assessment (refer Appendix 1 of the *Urban Design Statement*), particularly in relation to the development outcomes anticipated for Metropolitan Centre Precinct C.

973. The Metropolitan Centre Zone provisions, including MCZ-P1, MCZ-P2 and MCZ-P10, anticipate an integrated and compact urban environment comprising residential, commercial and complementary activities, supported by transport and pedestrian connections.

974. Urban Acumen identifies that the majority of the existing wetlands are located within the area identified for residential development on the Structure Plan. Given their fragmented distribution, retaining these areas would not simply reduce the amount of land available for housing. As explained in the assessment:

> *"It would create multiple undeveloped areas and 'gaps' within the built form"*

975. These gaps would affect the configuration of development blocks, continuity of street frontages, pedestrian connections and the ability to establish a coherent residential neighbourhood.

976. Similarly, Urban Acumen identifies that wetland retention within the Kapiti Road commercial and large format retail area would constrain the ability to accommodate these activities in a location with suitable access, visibility and servicing arrangements. Retention along the Link Road and Iver Trask Place extension would also reduce opportunities for development to address and activate these important movement corridors.

977. The assessment therefore identifies that the consequences of full wetland retention extend beyond development yield and include the overall efficiency, connectivity, safety and functioning of the proposed urban environment.

Earthworks and Ground Conditions

978. The existing ground conditions are a further consideration influencing the practicability of wetland avoidance. As outlined in Envelope's memorandum, geotechnical investigations have identified peat and organic sands beneath much of the low-lying land, which are generally unsuitable for supporting roads and building platforms without ground improvement or removal and replacement with engineered fill.

979. The proposed development requires substantial earthworks to establish suitable development platforms, road levels and flood protection. These works will alter existing ground levels and drainage patterns across much of the Site, with potential implications for groundwater levels and movement.

980. Envelope identifies that retaining isolated wetlands within areas subject to surrounding filling, ground improvement and drainage works would present challenges in maintaining their existing hydrological conditions. In particular, changes to the surrounding surface water and shallow groundwater regimes could affect the frequency, duration and extent of inundation within retained wetlands.

981. Wetland retention would therefore require corresponding changes to surrounding development platforms, drainage and servicing arrangements, with wider implications for the earthworks strategy and development layout.

Flood Management and the Proposed Wetland Area

982. The need to maintain and enhance the flood storage capacity currently provided within the Site, while accommodating the proposed development and ensuring that flood risk is not materially increased on surrounding properties or downstream areas, has also influenced the extent to which existing wetlands can practicably be retained.

983. The MCZ Structure Plan anticipates a consolidated stormwater management area within the southern part of the Site. As outlined in Section 3.3.3 of Envelope's memorandum, this location reflects the need to provide flood storage in hydraulic connection with the Wharemaukū Stream and manage floodwaters affecting the wider development area.

984. Envelope identifies that the flood storage area cannot be considered independently of the wider earthworks and development levels. Its location and design influence the ability to establish flood-free building platforms, accommodate stormwater infrastructure and manage flood conveyance.

985. The Proposal integrates this flood storage function within the new wetland complex, enabling ecological restoration and flood management to be accommodated within a consolidated area adjoining the Wharemaukū Stream.

986. As noted above, portions of the existing wetlands are located within the proposed indigenous wetland area. However, as the earthworks required to establish the wetland and its flood storage function will modify the existing habitats, these areas have been included within the total wetland reclamation extent.

987. This approach is consistent with MCZ-P1(5), which provides for "a large consolidated stormwater management area and, if practicable, wetland to provide for flood storage, ecological values and amenity values". The Proposal achieves this through the establishment of a consolidated indigenous wetland and flood storage area adjoining the Wharemaukū Stream.

Summary of Avoidance Considerations

988. The effects management hierarchy under clause 3.21 of the NPS-FM requires that *"adverse effects are avoided where practicable"*. This recognises that avoidance is not an absolute requirement in all circumstances, but must be considered in terms of what is practicable having regard to the particular characteristics and constraints of a site.

989. The Envelope and Urban Acumen assessments have considered the practicability of retaining the existing wetlands in the context of the Site's physical constraints, the infrastructure required to enable development and the urban form anticipated by the MCZ Structure Plan.

990. The key constraints include the fragmented distribution of the wetlands, the location and construction requirements of the strategic road network, the need to establish suitable development levels and servicing infrastructure, the potential hydrological implications of retaining isolated wetlands, and the requirement to provide flood storage adjoining the Wharemaukū Stream.

991. While individual wetland areas could potentially be retained through changes to the development layout, the technical assessments identify that doing so would have wider implications for the transport network, earthworks, flood management, development configuration and ongoing function of retained wetlands. As Urban Acumen concludes, wetland avoidance would materially constrain the residential and commercial development anticipated by the Structure Plan and adversely affect the integration and performance of the proposed movement network.

992. The distinction between what is technically possible and what is practicable is particularly relevant in this instance. The retention of individual wetland footprints cannot be considered in isolation from the wider development requirements, particularly where surrounding earthworks and drainage changes may compromise their ongoing hydrological function. Accordingly, the fact that some wetland areas could potentially be retained through substantial changes to the development layout does not necessarily mean that avoidance is practicable when the wider consequences are considered.

993. On this basis, the Applicant considers that the Proposal has appropriately applied the first step of the effects management hierarchy. The technical assessments demonstrate that opportunities to avoid wetland loss have been considered through the masterplanning process and that further avoidance is not practicable having regard to the interrelated engineering, infrastructure, hydrological and urban design constraints of the Site, together with the comprehensive development anticipated for Precinct C.

994. The residual adverse effects associated with wetland loss have been addressed through the subsequent steps of the effects management hierarchy, including the proposed wetland compensation measures and associated ecological management and monitoring requirements. These are described below.

7.13.5 ECOLOGICAL COMPENSATION

995. As outlined in the *Assessment of Ecological Effects*, the Project will result in the permanent loss of approximately 5.33ha of natural inland wetlands, comprising nine predominantly exotic pastoral wetlands distributed throughout the Site. These wetlands are generally characterised by pasture grasses and rushes, with relatively limited indigenous vegetation cover, and have been assessed as having low to moderate ecological values.

996. Notwithstanding their modified condition, the loss of these wetlands has been assessed as resulting in moderate to high residual adverse ecological effects. Accordingly, following application of the effects management hierarchy, the Project incorporates a wetland biodiversity compensation package to address these residual effects.

997. As detailed in the *Wetland Residual Effects Analysis Report*, the proposed approach involves biodiversity compensation rather than like-for-like offsetting. This reflects the opportunity to replace the existing fragmented, exotic-dominated pastoral wetlands with a larger, interconnected indigenous wetland complex that will provide greater ecological value and habitat diversity than the existing wetlands.

998. The main component of the compensation package is the creation of approximately 5.44ha of new indigenous wetland habitat within the southern and western parts of the Site, adjoining the Wharemaukū Stream corridor. The proposed wetland complex will be integrated with the wider open space and flood management network, with the wetland providing secondary flood storage and stormwater management functions.

999. The wetland will be formed through earthworks to establish appropriate ground levels, hydrological conditions and a range of wetland habitats. Water supply to the wetland will be supported by the realigned Watercourse 1, together with flows from the eastern part of the Site via a forebay and associated low-flow connection. The design will provide for varying inundation depths and saturation periods to support a diverse range of indigenous wetland vegetation communities.

1000. As detailed in the *Ecological Management Plan*, the proposed wetland will comprise a mosaic of habitat types, including:

- Permanently wet and frequently inundated areas, supporting obligate wetland species and associated aquatic habitats;

- Seasonally saturated marsh and swamp areas, supporting facultative wetland vegetation and providing habitat diversity across the wetland complex;

- Intermittently inundated and transitional areas, providing a gradual transition between wetland and adjoining terrestrial habitats; and

- Indigenous wetland forest, shrubland and riparian vegetation, including vegetation communities representative of the wider ecological district, such as kahikatea-pukatea forest, mānuka fen, reedland and wetland carr habitats.

1001. The proposed wetland complex will be supported by extensive indigenous buffer planting and will connect with the adjoining Wharemaukū Stream riparian corridor. The combination of different wetland habitats, vegetation structures and hydrological conditions is intended to provide improved habitat for indigenous freshwater fish, wetland birds, invertebrates and other indigenous fauna, while improving ecological connectivity through the Site and wider catchment.

1002. The proposed wetland hydrology, including the sources of water supply, anticipated groundwater levels and inundation patterns, and the ability of the proposed hydrological regime to support the establishment and long-term functioning of the intended wetland habitats, has been assessed in the *Hydrology Assessment* accompanying this application. This assessment informs the proposed wetland design and confirms the suitability of the proposed hydrological conditions to support the compensation wetland.

1003. The proposed compensation measures have been assessed using the Biodiversity Compensation Model (BCM), as detailed in the *Wetland Residual Effects Analysis Report*. The modelling predicts that the ecological gains associated with the proposed wetland creation and restoration will exceed the residual ecological losses, achieving no net loss of wetland extent and an overall net positive outcome for wetland biodiversity values.

1004. The creation and establishment of the compensation wetland will be undertaken progressively, in accordance with the *Ecological Management Plan*. This will include initial earthworks and establishment of appropriate wetland hydrology, followed by pioneer planting, subsequent enrichment planting and ongoing maintenance. The planting programme will be supported by weed and pest animal management, monitoring, replacement planting and adaptive management measures to ensure the intended wetland communities and ecological functions are established.

1005. The detailed implementation, monitoring and long-term management of the compensation wetland will be addressed through a final Wetland Management Plan, prepared in accordance with the *Ecological Management Plan*, *Wetland Residual Effects Analysis Report* and proposed GWRC consent conditions. This will include measurable ecological performance targets, monitoring of wetland hydrology and vegetation establishment, and provision for remedial measures where necessary. The compensation wetland will also be subject to ongoing protection and management to secure the intended ecological outcomes over the long term.

1006. Overall, the proposed compensation package will replace the existing fragmented pastoral wetlands with a substantial indigenous wetland complex that provides a greater diversity of habitats, improved ecological connectivity and enhanced wetland function, while also contributing to the wider flood management and open space outcomes of the Project.

7.14 INFORMATION REQUIREMENT IN AN APPLICATION FOR RECLAMATION – SCHED 5, CL8

1007. As the proposal includes both subdivision and reclamation of streams and wetlands, pursuant to Section 43(3)(a), Clause 8 of Schedule 5 sets out the information required for reclamation this is addressed in Table 11 below.

TABLE 11: INFORMATION REQUIREMENTS FOR SUBDVISION AND RECLAMATION	
INFORMATION REQUIRED FOR A SUBDIVISION CONSENT	
(2) In addition to the information required by clause 5, a consent application for a reclamation must include information to show the area to be reclaimed, including the following:	
(a) the location of the area to be reclaimed:	The locations and extents of the existing wetlands proposed to be reclaimed are identified in the Assessment of Ecological Effects (**Appendix 27**), including Figure 19 and Section 6.3.1. The Proposal involves the reclamation of nine existing wetlands, comprising approximately 5.33ha of wetland habitat. The location and extent of the proposed 5.44 ha wetland compensation area are illustrated in the Ecological Management Plan (**Appendix 29**), including Figure 1, with further details of the proposed wetland creation and restoration works provided in Section 5.
(b) if practicable, the position of all new boundaries:	The proposed subdivision boundaries, including those associated with the wetland complex, are illustrated on the proposed scheme plans accompanying the application. It is noted that the wetland offset area is provided in its own allotment with shared paths, infrastructure all located outside of this.
(c) any part of the reclaimed area to be set aside as an esplanade reserve or esplanade strip	No part of the reclaimed wetland areas is proposed to be set aside as an esplanade reserve or esplanade strip.

7.15 CONSENT LAPSE DATE

1015. The proposed lapse period is longer than the five years provided for under section 125(1)(a) of the RMA. The reasons for seeking an extended lapse period include:

- The Proposal involves a comprehensive mixed-use development, together with infrastructure and ecological restoration works. Development will occur progressively over multiple stages, with timing influenced by market demand, infrastructure delivery and construction sequencing. An extended lapse period will allow the various stages to be implemented without the risk of consents lapsing before the relevant works commence. In relation to subdivision, section 125(2) of the RMA provides that a subdivision consent is given effect to when a survey plan is submitted to the territorial authority under section 223. The extended period allows for the progressive submission of survey plans associated with the subdivision stages.

- The scale of the Proposal involves interrelated engineering, design and construction activities, including bulk earthworks, ground improvement, stormwater and flood management infrastructure, servicing upgrades, road construction and establishment of the wetland compensation complex. These works will require careful coordination, with some infrastructure and environmental management measures needing to be implemented ahead of subsequent development stages.

1016. It is also noted that the Maitahi Village Project, which is smaller in scale than the Proposal, has been approved under the Fast-track Approvals Act 2024 with a lapse period of 10 years for certain consents.

1017. Overall, the requested 15-year lapse period is considered appropriate having regard to the scale, complexity and anticipated staging of the Proposal. The extended period will provide flexibility for implementation, while the proposed consent conditions will continue to govern the timing of infrastructure delivery and ecological compensation measures.

8. PROPOSED CONDITIONS – SCHED 5, CL5(1)(K)

1018. This section is provided in accordance with clause 5(1)(k) of Schedule 5 of the FTAA. Conditions of consent are proposed to manage the adverse effects of the Proposal and secure the mitigation, compensation and enhancement measures identified in the supporting technical assessments.

1019. The proposed conditions are provided in Appendix 3 and are separated into district (subdivision and land use) and regional consents.

1020. In preparing the draft conditions, emphasis has been placed on adopting, as far as practicable, the standard conditions, terminology and formatting used by KCDC and GWRC. The intention is to provide a familiar and workable set of conditions that aligns with the Councils' established monitoring and compliance processes, while avoiding unnecessary duplication between the subdivision and land use consents.

1021. The conditions have also been informed by the author's experience with the Plimmerton Farm Stage 1 fast-track consent, which included extensive expert conferencing and conditions relating to wetland offsetting and ecological management. Regard has also been given to the conditions being developed through the Waikanae North fast-track process, particularly those relating to wetland reclamation, ecological management, mana whenua involvement and ongoing monitoring.

1022. The proposed conditions address the following key matters:

Mana whenua involvement

- Opportunities for mana whenua input into ecological restoration and management plans.
- Preparation and implementation of the Kaitiaki Monitoring Strategy.
- Cultural monitoring and involvement in relevant ecological management activities.
- Input into indigenous planting, species selection, wetland restoration and stream enhancement.

Construction and earthworks

- Construction management plans and staging of works.
- Erosion and sediment control, including monitoring and maintenance of control measures.
- Construction noise, vibration, dust and construction traffic management.
- Protection of adjoining properties, infrastructure and receiving environments during construction.
- Geotechnical investigations, ground improvement, engineered fill and construction monitoring.
- Accidental discovery protocols and archaeological management requirements.

Stormwater, flooding and servicing

- Detailed design, construction and certification of water supply, wastewater and stormwater infrastructure.
- Stormwater treatment, attenuation and hydraulic neutrality.
- Flood storage, secondary flow paths, finished ground levels and flood hazard management.
- Verification of soakage performance and groundwater considerations.
- Stormwater discharge requirements, monitoring and maintenance.
- Infrastructure vesting, easements and ongoing maintenance responsibilities.

Transport and access

- Detailed design and construction of the Link Road, Iver Trask Extension and all other internal roads.
- Intersection upgrades, vehicle access arrangements and road safety requirements.
- Pedestrian and cycling connections, including temporary connections where required.
- Road construction certification and associated infrastructure vesting.

Urban design and landscaping

- Detailed architectural and urban design requirements for residential and commercial development.
- Building materials, fencing, lighting, landscaping and streetscape treatment.
- Provision and maintenance of public open spaces, reserves and pedestrian connections.
- Landscape establishment, maintenance and replacement planting.

Wetland compensation and freshwater management

- Establishment of the proposed indigenous wetland compensation complex.
- Detailed wetland design, hydrological requirements, planting and habitat establishment.
- Ecological monitoring, performance targets, reporting and adaptive management.
- Long-term management, maintenance and protection of the wetland compensation area.
- Enhancement and restoration of the Wharemaukū Stream, including in-stream habitat improvements and riparian planting.
- Management of freshwater habitats, fish passage and indigenous freshwater fauna.
- Lizard and avifauna management during vegetation clearance and construction
- Weed and pest animal management.

Operational activities

- Management of operational noise and potential effects between residential and commercial activities.
- Servicing, loading, waste storage and collection arrangements.
- Ongoing management and maintenance of communal facilities and landscaped areas.

Subdivision and staging

- Subdivision staging and timing of infrastructure delivery
- Section 223 and section 224(c) certification requirements.
- Consent notices, easements and other ongoing property requirements.
- Vesting of roads, reserves and public infrastructure.
- Completion of necessary infrastructure and environmental management works prior to relevant subdivision or occupation milestones.

1023. The proposed conditions are expected to be further refined following review by KCDC and GWRC, continued engagement with Te Ātiawa. The Applicant anticipates providing updated condition sets to the Panel Convenor following lodgement, reflecting further technical discussions, engagement and any agreements reached with the relevant parties. The intention is to progressively narrow outstanding matters and provide the Panel with conditions that appropriately manage adverse effects, secure the proposed environmental outcomes and are practical to implement and administer.

9. RESOURCE CONSENTS REQUIRED – SCHED 5, CL5(3)(5)

1024. This section sets out the resource consents required for the proposed activity in accordance with the following clauses in Clause 5(3) and Clause 5(5) of Schedule 5.

1025. The following section summarises the activity status of the proposal with regard to the activities proposed including subdivision, infrastructure, transport, natural hazards, earthworks, and works in and near waterways.

1026. A detailed assessment of the Project against the relevant rules and standards of the District Plan, NRP and NES-F is provided in the *Statutory Assessment* at **Appendix 2**, with a summary of the consent requirements provided in the following sections.

9.1 KAPITI COAST DISTRICT RESOURCE CONSENT REQUIREMENTS

1027. An assessment of the Project against the relevant rules and standards of the District Plan is provided in Table 1 of the *Statutory Assessment* in **Appendix 2** with the consent requirements summarised in the below table.

TABLE 12: KAPITI COAST DISTRICT PLAN CONSENT REQUIREMENTS

RULE	RULE DETAIL	ACTIVITY STATUS
METROPOLITAN CENTRE ZONE		
MCZ-R5 MCZ-R11	Commercial and residential activities in Precinct C that do not comply with the permitted activity standards in Rule MCZ-R5 (non-compliance with residential location, garage recession and building coverage standards).	Restricted Discretionary
MCZ-R7 MCZ-R17	New buildings and structures outside the Dune Protection Area that do not comply with the permitted activity standards in Rule MCZ-R7.	Discretionary
MCZ-R8 MCZ-R12	Construction of roads identified in the Structure Plan that do not comply with the permitted activity standards (non-compliance with applicable Transport chapter standards).	Restricted Discretionary
MCZ-R10 MCZ-R12	Trade supply, home improvement and yard-based retail, food and beverage outlets, convenience retail and service stations in Precinct C that do not comply with the permitted activity standards (potential non-compliance with tenancy GFA limits).	Restricted Discretionary
MCZ-R14 MCZ-R17	Large format retail activities in Precinct C not permitted by MCZ-R10; non-compliance with applicable standards.	Discretionary
MCZ-R15	Earthworks in the Dune Protection Area identified in the Structure Plan that does not comply with the restricted discretionary activity standards.	Discretionary
MCZ-R16	Earthworks in the indicative Stormwater Management Area on the Structure Plan that does not comply with the restricted discretionary activity.	Discretionary

TABLE 12: KAPITI COAST DISTRICT PLAN CONSENT REQUIREMENTS		
RULE	RULE DETAIL	ACTIVITY STATUS
INFRASTRUCTURE		
INF-PNU-R18	New aboveground network utilities within any ponding area which are above ground, other than telecommunications and radiocommunications	Restricted Discretionary
INF-PNU-R19	New underground network utilities, other than telecommunication and radiocommunication, located within the Natural Open Space Zone	Restricted Discretionary
INF-PNU-R22	Any new above ground network utility not provided for under other specifically listed rules	Discretionary
TRANSPORT		
TR-R11	Any activity which is not a permitted, controlled, restricted discretionary or non-complying activity	Discretionary
TR-R15	New roads including where they are to serve a subdivision (including boundary adjustments) that do not meet any one of the controlled activity standards under TR-R9	Discretionary
NATURAL HAZARDS		
NH-FLOOD-R8	Development and earthworks within any flood storage or fill control area.	Controlled
NH-FLOOD-R11	Any activity listed as a controlled or restricted discretionary activity in this section which does not comply with one or more of the associated standards, unless otherwise specified	Restricted Discretionary
NH-FLOOD-R15	Subdivision of land located partly within the river corridor or stream corridor	Discretionary
SUBDIVISION		
SUB-DW-R9	Subdivision (excluding boundary adjustments or subdivision of land where no additional allotments are created) of land with peat or sand soils	Controlled
SUB-DW-R15	Subdivision where any part of the land contains flood storage, ponding, residual ponding or shallow surface flow areas	Discretionary
SUB-DW-R17	Subdivision of land located partly within the river corridor or stream corridor	Discretionary
SUB-WORK-R40 SUB-WORK-R48	Any activity which is listed as a restricted discretionary activity and does not comply with one or more of the associated standards, unless otherwise specifically stated	Discretionary
EARTHWORKS		
EW-R5	Earthworks not complying with one or more of the permitted activity standards in EW-R2 or EW-R3	Restricted Discretionary
SIGNAGE		
SIGN-R15	Freestanding pylon signage associated with the proposed commercial and drive-through activities that does not comply with the permitted activity standards under SIGN-R8.	Discretionary

9.1.1 NATIONAL ENVIRONMENTAL STANDARD FOR ASSESSING AND MANAGING CONTAMINANTS IN SOIL TO PROTECT HUMAN HEALTH

1098. The Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NES-CS') applies to specified activities undertaken on a "piece of land" where an activity or industry described on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL) is being, has been, or is more likely than not to have been undertaken.

1099. A *Preliminary Site Investigation* has been prepared by HAIL Environmental Limited and is included as **Appendix 31.** As set out in Section 5.1 of the assessment, the investigation identified no current or former HAIL activities across the majority of the Site. However, the area surrounding the former dwelling and hydroponics building at 77 Kapiti Road has conservatively been identified as potentially having been subject to:

- HAIL Category E1 – Asbestos products manufacture or disposal including sites with buildings containing asbestos products known to be in a deteriorated condition; and/or
- HAIL Category I – Any other land that has been subject to the accidental or intentional release of a hazardous substance in sufficient quantity that it may pose a risk to human health or the environment.

1100. Accordingly, HAIL Environmental considers this discrete area to constitute a "piece of land" for the purposes of the NES-CS. The relevant area is approximately 4,600m² and comprises the former residential section and hydroponics building area. Importantly, the assessment confirms that *"no current or former HAIL uses were identified on the remainder of the site."*

1101. The proposed development involves both a change in land use and substantial soil disturbance. The NES-CS implications of these activities are addressed separately below.

CHANGE OF USE

1102. The proposed development will change the use of the identified piece of land, including to residential and other urban activities. Section 5.5.1 of the assessment therefore considers the change of use provisions of the NES-CS.

1103. The potential contaminants of concern are lead associated with former lead-based paint and asbestos associated with former building materials. However, the proposed development involves removal of surface material for geotechnical purposes, which is expected to remove any residual lead and/or asbestos, if present. The conceptual site model therefore identifies no complete contaminant linkage between the former activities and future users of the Site.

1104. On this basis, HAIL Environmental concludes in Section 5.5.1 of the PSI that:

> *"the proposed change of use is highly unlikely to pose a risk to human health"*

1105. and therefore meets the permitted activity requirements of Regulation 8(4) of the NES-CS. Accordingly, resource consent is not required under the NES-CS for the proposed change of use.

SOIL DISTURBANCE

1106. Earthworks will, however, involve disturbance of soil within the identified piece of land. Regulation 8(3) provides for soil disturbance as a permitted activity subject to compliance with specified standards, including limits on the volume of soil disturbed and removed.

1107. As set out in Section 5.5.2 of the assessment, the identified piece of land has an area of approximately 4,600 m². This results in a permitted soil disturbance threshold of approximately 230m³ and a permitted off-site soil removal threshold of approximately 46m³.

1108. Given the extent of earthworks required to facilitate the proposed development, the assessment considers that compliance with the Regulation 8(3) permitted activity requirements is unlikely. No Detailed Site Investigation has been undertaken. Consequently, Regulation 10 does not provide a restricted discretionary activity pathway, and resource consent is required under Regulation 11 of the NES-CS as a **Discretionary Activity** for soil disturbance within the identified piece of land. As the PSI states:

> *"consent under the NES-CS will be required as a discretionary activity per Regulation 11, although for the 'piece of land' only."*

1109. The discretionary activity consent requirement is therefore limited to soil disturbance within the approximately 4,600m^2 former dwelling/hydroponics area at 77 Kapiti Road and does not apply to earthworks across the balance of the Site.

1110. To appropriately manage soil disturbed within this area, Section 5.6 of the PSI recommends soil sampling to determine suitable reuse and/or off-site disposal options. It is proposed that this requirement be secured through conditions of consent.

1111. It is also noted that the application Site also includes several smaller KCDC-owned land parcels, principally to accommodate infrastructure servicing connections associated with the Proposal. These areas were not included within the scope of the *Preliminary Site Investigation*. To address the potential for previously unidentified contamination within these areas, a general accidental discovery protocol is proposed through the *Draft Consent Conditions*. This condition will apply to earthworks across the entire Site and will provide for appropriate investigation and management should potentially contaminated material be encountered during construction.

NES-CS SUMMARY

1112. Discretionary Activity resource consent is required under NES-CS Regulation 11 for the disturbance and/or removal of soil from the identified approximately 4,600m^2 "piece of land" at 77 Kapiti Road.

1113. As noted above, a general accidental discovery protocol is also proposed through the *Draft Consent Conditions*.

9.2 GREATER WELLINGTON REGIONAL COUNCIL CONSENT REQUIREMENTS

1114. The Natural Resources Plan (NRP) including Plan Change 1 (PC1), and the National Environmental Standards for Freshwater (NES-F) are the applicable resource management documents for consideration. PC1 to the Natural Resources Plan was notified on 30 October 2023, with submissions closing on 15 December 2023.

1115. An assessment of the Project against the relevant rules and standards of the NRP is provided in Table 4 of the *Statutory Assessment* in **Appendix 2** with the consent requirements summarised in **Table 13** and following sections.

TABLE 13: NATURAL RESOURCES PLAN SUMMARY OF CONSENT REQUIREMENTS

RULE	ACTIVITY STATUS	REASON FOR CONSENT
R101 / R107 – Earthworks and vegetation clearance	Discretionary	The Proposal involves approximately 318,400m² of earthworks, exceeding the permitted activity threshold of 3,000m² per property per 12-month period. Vegetation clearance is also proposed within 5m of a stream, contrary to the applicable permitted activity conditions.
R52A – Operational stormwater discharges	Restricted Discretionary	Stormwater discharges associated with the proposed urban development do not meet Rule R48A, as the associated earthworks exceed 3,000m².

TABLE 13: NATURAL RESOURCES PLAN SUMMARY OF CONSENT REQUIREMENTS		
RULE	ACTIVITY STATUS	REASON FOR CONSENT
R53 – Stormwater discharges to land	Discretionary	Consent is sought for operational stormwater discharges to land that do not meet all the permitted activity conditions of Rule R49, including those relating to trade premises.
R117 – Activities in natural wetlands	Discretionary	The proposed wetland restoration and establishment works, including vegetation management, planting and associated disturbance, will not meet all the permitted activity conditions of Rule R114 and the wetland general conditions.
R118 – Activities in natural wetlands	Non-Complying	The Proposal involves the reclamation of approximately 5.33ha of natural inland wetlands, together with associated land disturbance, excavation, deposition and diversion of water.
R145 – Culverts A and J	Discretionary	The Proposal includes two new culverts that do not meet the permitted activity conditions of Rule R126. Culvert A is a rectangular structure approximately 4.0m wide, 1.5m high and 32.5m long. Culvert J comprises twin 1.35m diameter barrels approximately 34m long. Both exceed the maximum permitted culvert length of 20m and the applicable dimensional limits under Rule R126(i). The associated ancillary structures are also anticipated to exceed the 10m² bed occupation limit under Rule R126(p). In addition, the culverts are located within watercourses identified in Schedule C (mana whenua), contrary to Rule R126(g), and the associated stream works may not meet the riverbed general conditions, including conditions (e) and (l). As the culverts do not meet all the applicable conditions of Rule R126, they do not qualify under Rule R129 and require consent under Rule R145.
R145 – Culvert H extension	Discretionary	The Proposal includes a minor extension to existing Culvert H. For the purposes of this assessment, it is conservatively assumed that the extension will not meet the permitted activity conditions of Rule R122, particularly the limitations on increasing the size of an existing structure under condition (g). Accordingly, consent is sought under Rule R145 on the assumption that the works are within the bed of a river.
R147 – Damming and diversion of water	Discretionary	The Proposal includes diversion of water associated with modifications to the Wharemaukū Stream and Watercourse 1, together with the proposed flood storage function of the wetland complex. The flood storage area does not meet all the permitted activity conditions of Rule R127, including the contributing catchment area threshold and Schedule C restrictions. Consent is sought under Rule R147 on a conservative basis.
R160 – Construction dewatering	Restricted Discretionary	Temporary groundwater dewatering associated with construction is anticipated to exceed the one-month duration permitted under Rule R159.
R166 – Construction bore	Controlled	The Proposal includes the establishment of a temporary construction bore that requires consent under Rule R166.

1150. The relevant rules and conditions under the NRP are assessed in a detailed assessment against the rules and standards provided in **Appendix 2.**

9.2.1 PROPOSED PLAN CHANGE 1 TO THE NRP

1151. Proposed Plan Change 1 to the Natural Resources Plan was notified on 30 October 2023, with submissions closing on 15 December 2023. The rules within Plan Change 1 (PC1) have immediate effect.

1152. PC1 is largely focused on Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua and includes objectives and policies, rules and other methods to manage activities such as earthworks, stormwater discharges including from new urban development, wastewater discharges, and rural land use to achieve water quality and ecological health objectives within these areas.

1153. Where rule changes apply more broadly, they have been considered, however have not been found to be relevant to the Project.

9.2.2 NATIONAL ENVIRONMENTAL STANDARD FOR FRESHWATER

REGULATION 39 – RESTORATION, WETLAND MAINTENANCE, AND BIOSECUTIRY OF NATURAL INLAND WETLANDS

1154. An assessment of the proposed wetland works against the general wetland conditions is provided in Table 6 of **Appendix 2**. Due to some identified infringements, **Discretionary Activity** resource consent is sought under Regulation 70 – Culverts.

REGULATION 45C URBAN DEVELOPMENT

1155. Regulation 45C(1) – (5) provides vegetation clearance, earthworks or land disturbance (including works that result in drainage), and the taking, use, damming or diversion of water within, or within 10m and 100m of a natural inland wetland if it is for the purpose of constructing urban development as a **Restricted Discretionary Activity**.

1156. Clauses 6 and 7 set out particular matters to be considered under this regulation, which are discussed further within Section 5:

> *(6) A resource consent for a restricted discretionary activity under this regulation must not be granted unless the consent authority has first—*
>
> *(a) satisfied itself that the urban development—*
>
> *(i) will contribute to a well-functioning urban environment; and*
>
> *(ii) will provide significant national, regional, or district benefits; and*
>
> *(b) satisfied itself that—*
>
> *(i) there is no practicable alternative location for the activity within the area of the development; or*
>
> *(ii) every other practicable alternative location in the area of the development would have equal or greater adverse effects on a natural inland wetland; and*
>
> *(c) applied the effects management hierarchy.*
>
> *(7) A resource consent for a restricted discretionary activity under this regulation must not be granted if the activity—*
>
> *(a) occurs on land other than land that is identified for urban development in the operative provisions of a regional or district plan; or*
>
> *(b) occurs on land that is zoned in a district plan as general rural, rural production, or rural lifestyle.*

1157. As the proposed works have a status under Regulation 45C they do not need to be assessed under Regulation 52 Non-Complying Activities or Regulation 52 Prohibited Activities.

REGULATION 70 – CULVERTS

1158. An assessment of the proposed culverts against the permitted activity conditions in Regulation 70 is provided in Table 6 of **Appendix 2**. Due to some identified infringements, **Discretionary Activity** resource consent is sought under Regulation 70 – Culverts.

9.3 SUMMARY OF CONSENTS REQUIRED

1159. A summary of the resource consents and discharge permits sought for the Proposal are set out in **Table 14** below.

TABLE 14: SUMMARY OF CONSENTS REQUIRED

RULE / REG	ACTIVITY FOR WHICH CONSENT IS SOUGHT	ACTIVITY STATUS
KAPITI COAST DISTRICT COUNCIL		
MCZ-R11	Commercial and residential activities in Precinct C not meeting permitted activity standards.	Restricted Discretionary
MCZ-R17	Buildings and structures not meeting permitted activity standards.	Discretionary
MCZ-R12	Construction of Structure Plan roads not meeting permitted activity standards.	Restricted Discretionary
MCZ-R12	Retail and commercial activities not meeting permitted activity standards.	Restricted Discretionary
MCZ-R17	Large format retail activities not meeting applicable standards.	Discretionary
MCZ-R15	Earthworks within the Dune Protection Area.	Discretionary
MCZ-R16	Earthworks within the indicative Stormwater Management Area.	Discretionary
INF-PNU-R18	Aboveground network utilities within ponding areas.	Restricted Discretionary
INF-PNU-R19	Underground network utilities within the Natural Open Space Zone.	Restricted Discretionary
INF-PNU-R22	Aboveground network utilities not otherwise provided for.	Discretionary
TR-R11	Transport activities not otherwise provided for under the permitted or other activity rules.	Discretionary
TR-R15	New roads not meeting controlled activity standards.	Discretionary
NH-FLOOD-R8	Development and earthworks within flood storage or fill control areas.	Controlled
NH-FLOOD-R11	Flood hazard activities not meeting applicable standards.	Restricted Discretionary
NH-FLOOD-R15	Subdivision within river or stream corridors.	Discretionary
SUB-DW-R9	Subdivision of land containing peat or sand soils.	Controlled
SUB-DW-R15	Subdivision within identified flood hazard areas.	Discretionary
SUB-DW-R17	Subdivision within river or stream corridors.	Discretionary
SUB-WORK-R48	Subdivision works not meeting restricted discretionary activity standards.	Discretionary
EW-R5	Earthworks not meeting permitted activity standards.	Restricted Discretionary
SIGN-R15	Freestanding pylon signage associated with the proposed commercial and drive-through activities that does not comply with the permitted activity standards under SIGN-R8.	Discretionary
Regulation 11 (NEC-CS)	Soil disturbance within the identified approximately 4,600m² piece of land at 77 Kapiti Road.	Discretionary
GREATER WELLINGTON REGIONAL COUNCIL		
R101 / R107*	Earthworks and associated sediment discharges.	Discretionary
R101 / R107*	Vegetation clearance within 5m of a stream.	Discretionary
R52A	Operational stormwater discharges associated with new urban development.	Restricted Discretionary

TABLE 14: SUMMARY OF CONSENTS REQUIRED		
RULE / REG	ACTIVITY FOR WHICH CONSENT IS SOUGHT	ACTIVITY STATUS
R53	Operational stormwater discharges to land.	Discretionary
R117	Wetland restoration and associated activities.	Discretionary
R118	Reclamation of natural inland wetlands and associated activities.	Non-Complying
R145	Placement of Culverts A and J and associated riverbed works.	Discretionary
R145	Extension of existing Culvert H and associated riverbed works.	Discretionary
R147	Damming and diversion of water, including flood storage.	Discretionary
R160	Construction dewatering.	Restricted Discretionary
R166	Construction of temporary bore.	Controlled
NES-F: Reg 45C(1)–(2)	Vegetation clearance and earthworks within or near natural inland wetlands.	Restricted Discretionary
NES-F: Reg 45C(3)	Earthworks or land disturbance resulting in drainage of natural inland wetlands.	Restricted Discretionary
NES-F: Reg 45C(4)	Taking, use, damming or diversion of water associated with urban development near natural inland wetlands.	Restricted Discretionary
NES-F: Reg 45C(5)	Discharge of water associated with urban development near natural inland wetlands.	Restricted Discretionary
NES-F: Reg 70	Culvert works not meeting permitted activity conditions.	Discretionary

1280. Overall, the Proposal is assessed as a **Non-Complying Activity**, due to the proposed reclamation of natural inland wetlands under Rule R118 of the Natural Resources Plan. While the Proposal also requires consent for a range of Controlled, Restricted Discretionary and Discretionary Activities, these activities are considered together as part of the integrated development.

9.4 DESCRIPTION OF ANY OTHER RESOURCE CONSENTS FOR THE PROJECT – SCHED 5, CL5(1)(F),(L)

1281. This section is provided in accordance with the Schedule 5 Clauses 5(1)(f) and 5(1)(l), as well as Section 30 of the FTAA.

> *5 Information required in consent application*
>
> *(1) For the purposes of section 43(3)(a), a consent application must include the following information: …*
>
> *(f) a description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates;*
>
> *AND …*
>
> *(l) if a notice under section 30(3)(b) or (5) has been received,—*
>
> *(i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and*

(ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.

1282. The resource consents sought through this Substantive Application provide for the proposed residential and commercial development, associated subdivision, infrastructure and environmental works. However, additional unit title subdivision consents will be required to enable individual ownership of the proposed apartments and the mixed-use buildings where unit title ownership is intended. These consents are not sought as part of the current application. It is standard practice for unit title subdivision consents to be applied for separately, once the detailed building designs, individual unit configurations and common property arrangements have been confirmed. The subsequent applications will address the subdivision and titling arrangements for the development authorised through this application. Other than these future unit title subdivision consents, no additional resource consents, notices of requirement or alterations to designations have been identified as necessary for the Project.

1283. In accordance with section 30 of the FTAA, the Applicant has provided notice to Greater Wellington Regional Council (GWRC) of its intention to lodge a Substantive Application. A copy of GWRC's response is provided in Appendix 39.

1284. GWRC's response identified a number of existing resource consents held by KCDC relating to stream works, stormwater infrastructure and water diversions associated with the Wharemauku Stream. As outlined in the assessment of section 30 above, the proposed works are not expected to affect KCDC's ability to continue exercising these consents or result in non-compliance with their conditions. The Applicant has engaged with KCDC regarding the existing and proposed culvert arrangements, including providing plans identifying the new culverts. Accordingly, the requirements of section 30 have been addressed, and the relevant information required under Schedule 5, clause 5(1)(l) has been provided.

10. FRESHWATER FISHERIES APPROVALS – SCHED 5, CL9

1285. The Proposal includes the construction of new culverts and extension of an existing culvert associated with the Wharemaukū Stream, Watercourse 1, the proposed swale, and wetland complex. These structures are required to accommodate the proposed road network, maintain stormwater conveyance and provide hydraulic connectivity between freshwater habitats.

1286. The proposed works have been considered against Regulation 42 of the Freshwater Fisheries Regulations 1983 and the provisions of the FTAA relating to standard freshwater fisheries activities.

1287. Section 4 of the FTAA distinguishes between standard and complex freshwater fisheries activities. The proposed culverts are intended to maintain fish passage and are not designed to permanently block fish movement. Accordingly, where the works fall within the definition of a standard freshwater fisheries activity, they are included as part of the resource consent application under Schedule 5. No separate complex freshwater fisheries activity approval is sought.

1288. Clause 9 of Schedule 5 sets out the information requirements for resource consent applications that include standard freshwater fisheries activities. These requirements relate to the proposed structures, freshwater species and values, surrounding water quality and quantity, and the provision of fish passage.

1289. The following assessment identifies the relevant culvert works and addresses these information requirements. The associated NRP and NES-F resource consent requirements are also identified for completeness, with the detailed rule assessments provided in **Section 9** above and in the *Statutory Assessment* in **Appendix 2**.

10.1 PROPOSED CULVERTS AND APPLICABLE REQUIREMENTS

1290. The locations and indicative dimensions of the proposed culverts are shown on the Culvert Location Plan provided in **Appendix 19A**.

1291. Table 15 below identifies the proposed culverts and summarises the applicable consent requirements under the NRP and NES-F, together with an assessment of whether the works qualify as standard freshwater fisheries activities under the FTAA.

TABLE 15: CULVERT WORKS - STANDARD FRESHWATER FISHERIES ACTIVITY ASSESSMENT

CULVERT	NRP, NES-F AND STANDARD FRESHWATER FISHERIES ACTIVITY ASSESSMENT
A, A2 and A3 – Wharemaukū Stream	Located within the Wharemaukū Stream and therefore the NRP and NES-F apply. Discretionary Activity consent is required under NRP Rule R145, as the proposed crossing does not meet the permitted activity requirements of Rule R126. The central box culvert is specifically designed to provide fish passage, with the adjoining culverts providing additional flow conveyance capacity. **Standard freshwater fisheries activity.**
B, B2 and B3 – Wetland connection	Located beneath the Link Road between areas of the proposed wetland compensation complex. The NRP and NES-F riverbed culvert provisions are not considered to apply, as the structures are not within an existing riverbed. The central box culvert is designed to maintain hydraulic connectivity and provide for fish movement between the proposed wetland habitats. **Standard freshwater fisheries activity.**
C – Watercourse 1 / swale	Located within the proposed swale network associated with Watercourse 1. The NRP and NES-F riverbed culvert provisions are not considered to apply, as Watercourse 1 has been assessed as an artificial farm drain. The existing drain may provide intermittent fish habitat and the proposed swale will convey water. The structure will be designed to not impede fish passage. **Standard freshwater fisheries activity.**
D – Watercourse 1 / swale	Associated with the artificial drain and proposed swale network. The NRP and NES-F riverbed culvert provisions are not considered to apply. The structure will maintain stormwater conveyance beneath the proposed road and will be designed to not impede fish passage. **Standard freshwater fisheries activity.**
E – Adjacent to NZTA land	Located beneath the proposed bund adjoining the NZTA land. The NRP and NES-F riverbed culvert provisions are not considered to apply. The structure will be designed to not impede fish passage. **Standard freshwater fisheries activity.**
H – Existing culvert extension	Involves a minor extension of an existing 1,800mm diameter culvert. Discretionary Activity consent is conservatively sought under NRP Rule R145, assuming the drainage feature constitutes a river and the extension does not comply with Rule R122(g). Existing fish passage will be maintained. **Standard freshwater fisheries activity.**
J – Wharemaukū Stream	Located within the Wharemaukū Stream and therefore the NRP and NES-F apply. Discretionary Activity consent is required under NRP Rule R145, as the proposed twin-barrel culvert does not meet the permitted activity requirements of Rule R126. The culverts will be designed to not impede fish passage. **Standard freshwater fisheries activity.**
K – Watercourse 1 / swale	Located within the upper reaches of the artificial drain and proposed swale network. The NRP and NES-F riverbed culvert provisions are not considered to apply. The crossing primarily maintains stormwater conveyance, with limited upstream aquatic habitat anticipated. The structure will be designed to not impede fish passage. **Standard freshwater fisheries activity.**

10.2 INFORMATION REQUIREMENTS – SCHEDULE 5, CLAUSE 9

1319. Clause 9 of Schedule 5 requires an application that includes standard freshwater fisheries activities to provide information relating to the proposed structures and fish passage arrangements, freshwater species and values, and the water quality and quantity of the surrounding habitat.

1320. The following assessment is based on the Stormwater Management Plan, Flood Risk Assessment and the Ecological Effects Assessment.

TABLE 16: INFORMATION REQUIREMENTS FOR STANDARD FRESHWATER FISHERIES ACTIVITIES – SCHEDULE 5, CLAUSE 9

INFORMATION REQUIREMENT	ASSESSMENT
Clause 9(a)(i) – Description of the type of structure or fish facility	The Proposal includes box culverts and circular pipe culverts associated with the Wharemaukū Stream, proposed wetland complex, Watercourse 1 and swale network. Culverts A and B each comprise a central box culvert with two adjoining box culverts. Culvert J comprises twin circular pipes. Culverts C, D, E and K provide drainage crossings, while Culvert H involves an extension to an existing pipe culvert. The proposed structures are illustrated on Drawing SK-4001.
Clause 9(a)(ii) – Dimensions of the structure or fish facility	Refer culvert dimensions in Section 7.13 above.
Clause 9(a)(iii) – Design of the structure or fish facility	The culverts have been sized at a preliminary level to accommodate the required hydraulic flows. Culverts A and B incorporate central box culverts specifically intended to provide fish passage. Culvert J and the extension to Culvert H will maintain fish movement through the existing drainage network. The SMP identifies a minimum 25% embedment for Culverts A and J to provide for bed substrate within the structures.
Clause 9(a)(iv) – Placement of the structure or fish facility	Culverts A and J are located within the Wharemaukū Stream. Culvert B connects the two areas of the proposed wetland compensation complex beneath the Link Road. Culverts C, D and K are associated with Watercourse 1 and the swale network, Culvert E is located adjoining NZTA land, and Culvert H involves an existing drainage crossing near Brett Ambler Way. The locations are shown on Drawing SK-4001.
Clause 9(a)(v) – Water flows	The culverts will convey flows through the existing and proposed drainage network, including the Wharemaukū Stream, central swale and wetland compensation complex. The SMP and Flood Risk Assessment have considered the hydraulic performance of the proposed infrastructure and its relationship with the wider flood management system. The proposed swale will convey water, including flows associated with Watercourse 1. Detailed design will confirm the hydraulic characteristics of each crossing, including flow depths and velocities under normal and higher-flow conditions.
Clause 9(a)(vi) – Operating regime	The culverts will be permanent, passive structures conveying flows in response to natural and stormwater conditions. They will not require mechanical operation or active flow regulation. The structures will be subject to ongoing inspection and maintenance to maintain hydraulic capacity, structural integrity and fish passage functions.
Clause 9(b) – Freshwater species and values present, particularly threatened, data-deficient and at-risk species	The *Ecological Effects Assessment* prepared by Bioresearches identifies indigenous freshwater fish within the Wharemaukū Stream, including īnanga, shortfin eel, longfin eel, redfin bully and common bully. Freshwater shrimp have also been recorded. Longfin eel and īnanga are identified as At Risk – Declining species. Fish Index of Biotic Integrity ratings were Poor to Very Poor across the surveyed reaches. The assessment also notes that the lower reaches of Watercourse 1 may provide intermittent fish habitat, while aquatic habitat in the upper drainage network is more limited.
Clause 9(c) – Water quality and quantity in the surrounding habitat	The existing freshwater environment is highly modified by historical drainage, channel modification and pastoral land use. The *Ecological Effects Assessment* identifies limited riparian vegetation, modified channel forms and variable water quality. Recorded dissolved oxygen concentrations were approximately 10.4–11.1g/m³ in the Wharemaukū Stream and 4.9g/m³ in the lower reach of Watercourse 1. The SMP and FRA consider the conveyance of flows through the proposed infrastructure.

TABLE 16: INFORMATION REQUIREMENTS FOR STANDARD FRESHWATER FISHERIES ACTIVITIES – SCHEDULE 5, CLAUSE 9	
INFORMATION REQUIREMENT	ASSESSMENT
	Construction-phase effects will be managed through erosion and sediment controls and freshwater works management measures.
Clause 9(d) – How fish passage will be provided for or impeded	The proposed culverts are intended to maintain fish passage between connected aquatic habitats. Culverts A and B incorporate central box culverts specifically designed for fish movement, while Culverts J and H will maintain passage through existing waterways and drainage infrastructure. The culverts associated with Watercourse 1 and the proposed swale will be designed having regard to not impede fish passage

10.3 SUMMARY

1342. The proposed culverts form part of the integrated road, stormwater and freshwater management infrastructure for the Project. The structures are intended to maintain hydraulic connectivity and provide for fish passage where existing or potential aquatic habitat connections are present.

1343. The relevant works are proposed to be treated as standard freshwater fisheries activities under the FTAA. The final applicability of these provisions to Culverts C, D, E and K, together with the outstanding hydraulic and freshwater ecology information identified above, will be confirmed through the updated technical assessments.

1344. No complex freshwater fisheries activity approval is sought.

11. ASSESSMENT OF ENVIRONMENTAL EFFECTS – SCHED 5, CL5(4), CL6 AND CL7

1345. This section is provided in accordance with Clause 5(4), Clause 6 and Clause 7 of Schedule 5 of the FTAA, as well as section 88 and Schedule 4 of the RMA.

11.1 ASSESSMENT OF THE ACTUAL OR POTENTIAL EFFECTS ON THE ENVIRONMENT - SCHED5, CL6(1)(A)

1346. Clause 6(1)(a) requires the following information be provided:

> *(a) an assessment of the actual or potential effects on the environment:*

1347. The effects identified below have been informed by the various technical experts assigned to the project. This subsection addresses positive effects, as specific matters listed in Clause 6 and Clause 7 of Schedule 5 are addressed in later subsections.

11.1.1 HAZARDOUS INSTALLATIONS - SCHED5, CL6(1)(B)

1348. Clause 6(1)(b) requires the following information be provided:

> *(b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use:*

1349. There are no hazardous installations currently on the site, nor are there any proposed as part of the application. This subclause is therefore not relevant to the application.

11.1.2 DESCRIPTION OF CONTAMINANT DISCHARGES AND ALTERNATIVE METHODS – SCHED5, CL6(1)(C)

1350. Clause 6(1)(c) requires the following information be provided:

> *(c) if the activity includes the discharge of any contaminant, a description of—*
>
> *(i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and*
>
> *(ii) any possible alternative methods of discharge, including discharge into any other receiving environment:*

1351. The Project involves the discharge of potentially sediment-laden water during earthworks and construction activities, operational stormwater discharges from roads, buildings and other impervious surfaces, and the diversion and management of floodwaters as part of the proposed flood management measures.

1352. The nature of these discharges, the sensitivity of the receiving environments, potential adverse effects and measures proposed to manage these effects are addressed in the relevant assessments that follow, including the assessments of earthworks and construction effects, stormwater management, water quality and flood hazards. These assessments also address the alternative methods of discharge and management considered through the design process.

1353. The assessments are supported by the Earthworks and Construction Management Plan (Appendix 16), Stormwater Management Plan (Appendix 14) and Flood Risk Assessment (Appendix 15).

1354. The receiving environment includes the Wharemaukū Stream, associated watercourses and wetlands, and the wider downstream freshwater environment. These environments have ecological, hydrological and cultural values and are sensitive to changes in water quality, sediment inputs and flow regimes. The proposed discharge and stormwater management measures have therefore been developed having regard to these sensitivities, including the need to manage sediment during construction and contaminants associated with the operational use of the Site.

1355. Alternative methods of managing stormwater and construction-related discharges have been considered through the design process, including opportunities for on-site treatment, attenuation, discharge to land and discharge to the existing drainage network and receiving watercourses. The proposed approach incorporates erosion and sediment controls during construction, together with a stormwater management system designed to provide treatment and manage runoff from the completed development.

1356. The proposed approach has been informed by the Site's existing drainage patterns, ground conditions, flood storage requirements and the need to integrate stormwater infrastructure with the proposed development and wetland compensation areas. The supporting technical assessments identify the measures proposed to manage discharges and demonstrate how potential adverse effects on the receiving environment will be avoided or minimised.

11.1.3 MITIGATION MEASURES – SCHED5, CL6(1)(D)

1357. Clause 6(1)(d) requires the following information be provided:

> *(d) description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:*

1358. The actual and potential effects of the Project, together with the measures proposed to avoid, remedy, mitigate or otherwise manage those effects, are assessed in detail in the following sections of this AEE. **Table 17** provides a summary of the principal effects identified and the corresponding mitigation, management and compensation measures. Where relevant, these measures have been incorporated into the proposed conditions of consent in Appendix 3, including requirements for management plans, detailed design and ongoing monitoring. Further details are provided in the supporting technical assessments.

TABLE 17: SUMMARY OF ACTUAL AND POTENTIAL EFFECTS AND PROPOSED MITIGATION MEASURES	
ACTUAL OR POTENTIAL EFFECT	PROPOSED MITIGATION, MANAGEMENT OR COMPENSATION MEASURES
Social effects – Changes to the existing use of the Site and surrounding community arising from residential and commercial development.	Additional housing, commercial activities, employment opportunities, public open spaces and walking and cycling connections.
Residential character and amenity – Increased building density, scale and activity, including potential effects on adjoining residential properties.	Building setbacks, height transitions, boundary landscaping and on-lot landscaping requirements, with transitions between higher-density and adjoining residential areas. On-lot landscaping and relevant built-form requirements are addressed through the proposed KCDC conditions.
Internal residential amenity and urban design – Potential effects on privacy, outlook, sunlight access and the quality of residential environments.	Building orientation and separation, private outdoor living areas, on-lot landscaping and interconnected streets, pedestrian connections and open spaces. Relevant landscaping and detailed design requirements are addressed through the proposed KCDC conditions.
Landscape character and values – Permanent changes to the landscape through earthworks, urban development and modification of natural landforms.	Integrated landscape design, enhancement of the Wharemaukū Stream corridor, indigenous wetland establishment and planting within streets, reserves and open spaces. Landscape plans and planting requirements are addressed through the proposed KCDC conditions.
Visual amenity – Changes to views from surrounding roads, properties and public areas through the introduction of buildings, roads and infrastructure.	Landscaping along development edges, street tree planting, building setbacks and landscape treatment of public spaces. Landscape planting requirements are addressed through the proposed KCDC conditions.
Dune modification and removal – Permanent removal and modification of existing dune landforms and loss of their physical form and landscape values.	Regrading of the western dune to establish a new landform along the Kapiti Expressway, incorporating indigenous dune planting and removal of existing exotic vegetation. These measures, together with the wider wetland and open space network, will assist in mitigating landscape and natural character effects, although the permanent loss and modification of the existing dunes cannot be avoided.
Traffic generation and network effects – Additional vehicle movements with potential effects on intersection capacity, delays and road safety.	Link Road and associated intersections, turning lanes, intersection improvements and pedestrian and cycle connections. Road and intersection works are subject to the proposed transport and Engineering Approval conditions.
Vehicle access and manoeuvring – Potential conflicts associated with vehicle crossings, JOALs, turning movements, sightlines and intersection arrangements.	Detailed design of intersections, right-turn bays, crossings, sightlines, JOALs and turning areas through Engineering Approval. The proposed KCDC conditions require confirmation of these matters at detailed design stage.
Earthworks and construction effects – Temporary dust, sediment runoff, construction traffic and disturbance from bulk earthworks, ground improvement and infrastructure works.	Earthworks and Construction Management Plan and Erosion and Sediment Control Plan, including staging, sediment controls, dust suppression and site management. The proposed KCDC and GWRC conditions require final construction and erosion and sediment control plans to be prepared and implemented.
Changes to groundwater conditions – Potential changes to groundwater levels, recharge and stream baseflow from earthworks, ground improvement and drainage.	Groundwater modelling to inform development and wetland levels, passive soakage through rain gardens and construction groundwater management. Relevant groundwater, stormwater and detailed design requirements are addressed through the proposed conditions.
Contaminated land effects – Potential exposure to contaminated soil during earthworks in identified areas.	Targeted soil sampling and controls for excavation, handling, reuse and off-site disposal. The proposed conditions require further soil investigation and appropriate management of disturbed material.
Terrestrial ecological effects – Vegetation removal and modification of existing terrestrial habitats.	Vegetation clearance controls, ecological management and habitat restoration and enhancement planting. Ecological management and restoration measures are addressed through the proposed ecological management conditions.

Effects on avifauna – Potential disturbance, injury or mortality of native birds during clearance and construction.	Avifauna Management Plan, including pre-clearance checks and measures to avoid disturbance of nesting birds. Implementation of the Avifauna Management Plan is provided for through the proposed ecological conditions.
Effects on lizards – Loss of lizard habitat and potential injury or mortality during clearance and earthworks.	Lizard Management Plan, including salvage, relocation and habitat enhancement. Separate DOC wildlife approval following release-site survey. Ecological management requirements are included in the proposed conditions; the wildlife approval is being progressed separately with DOC.
Effects on bats – Potential disturbance or loss of bat habitat from vegetation removal and construction.	Bat surveys did not identify activity on the Site; no specific bat management measures are proposed on the assessment findings.
Effects on freshwater habitats and fauna – Removal and modification of drains and aquatic habitats, potentially affecting fish passage, fauna and water quality.	Fish recovery and relocation, Fish Management Plan, Streamworks Management Plan, fish passage and Wharemaukū Stream restoration and enhancement. The proposed ecological and stream works conditions provide for implementation of the relevant management plans.
Loss of natural inland wetlands – Permanent reclamation of approximately 5.33ha of natural inland wetlands and associated habitat and ecological functions.	Biodiversity compensation through approximately 5.44ha of indigenous wetland habitat, Freshwater Restoration Plan and Wetland Management Plan, with planting, pest control, monitoring and adaptive management. The proposed GWRC conditions require a final Wetland Management Plan, monitoring, maintenance and remedial measures.
Aesthetic and recreational values – Changes to the existing landscape and recreational opportunities.	Public open spaces, landscaped reserves, walking and cycling connections, and access to enhanced stream and wetland corridors.
Historic heritage and archaeological values – Potential disturbance or destruction of archaeological material during earthworks.	Archaeological authority and Archaeological Management Plan, including monitoring, accidental discovery procedures and recording. Archaeological management is addressed through the archaeological authority sought as part of this application.
Stormwater management – Increased runoff and peak flows from additional impervious surfaces and drainage changes.	Stormwater attenuation, bioretention rain gardens, passive soakage and drainage network integration; soakage confirmed by testing and detailed design. Stormwater design, treatment and detailed design requirements are addressed through the proposed conditions.
Water quality effects – Potential sediment-laden construction discharges and increased contaminants in operational runoff.	Erosion and sediment controls, baseline and construction-phase water quality monitoring, rain gardens and proprietary treatment devices where required. The proposed conditions provide for erosion and sediment controls, water quality monitoring and stormwater treatment.
Construction and operational noise – Temporary noise from construction and vehicles, and operational noise from commercial activities and fixed plant.	Construction Noise Management Plan, applicable noise standards, acoustic assessment of commercial plant, and acoustic insulation and ventilation for noise-sensitive activities. The proposed KCDC conditions require a Construction Noise Management Plan and acoustic design requirements for future activities.
Geotechnical hazards – Potential settlement, liquefaction, lateral spreading and instability due to ground conditions and earthworks.	Removal of unsuitable soils, ground improvement, engineered fill, foundation design and geotechnical testing and certification. Geotechnical design, testing and certification requirements are addressed through the proposed conditions.
Flood hazards – Existing Wharemaukū Stream and catchment flooding, with potential changes to flood levels, flow paths and storage.	Approximately 35,000 m³ of additional flood storage integrated with the wetland complex, ground level changes, drainage and flood conveyance, minimum floor levels and detailed hydraulic design. Flood storage, minimum floor levels and further detailed hydraulic design are addressed through the proposed engineering and flood management conditions.
Effects on cultural values – Reclamation of wetlands, modification and removal of dunes and works within the Wharemaukū Stream corridor affect values identified by Te Ātiawa ki Whakarongotai.	Stream enhancement, indigenous wetland creation and restoration, and mana whenua involvement under proposed conditions. Further discussions on stream naturalisation, dune removal and a cultural compensation framework for residual effects, with KCDC/GWRC engagement and refinement of conditions as outlined in the memorandum provided in **Appendix 33A**. Draft conditions already provide for mana whenua involvement in relevant management measures.

11.1.4 VIEWS OF PERSONS AFFECTED – SCHED 5, CL6(1)(E)

1425. Clause 6(1)(e) requires the following information be provided:

> *(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:*

1426. The persons that are potentially affected by the proposal and all those otherwise consulted are set out in the *Consultation Summary Report* attached in **Appendix 38.** This report sets out their views and how these views have been responded to in the application.

11.1.5 NO RESPONSE FROM IWI OR HAPŪ – SCHED 5, CL 6(1)(F)

1427. Clause 6(1)(f) requires the following information be provided:

> *(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision:*

1428. As detailed in the *Consultation Summary Report* in **Appendix 38**, engagement has been undertaken with Puketapu ki Paraparaumu Hapū, through Te Ātiawa ki Whakarongotai Charitable Trust, Ngāti Toa Rangatira and Muaūpoko Tribal Authority.

1429. Puketapu ki Paraparaumu Hapū's involvement has been coordinated through Te Ātiawa ki, which has actively engaged with the Applicant and provided an *Interim Cultural Impact Assessment*. Discussions remain ongoing regarding the matters raised in that assessment.

1430. Ngāti Toa Rangatira has confirmed that it defers to Te Ātiawa in relation to cultural matters associated with the Project, but has requested to remain informed as the Project progresses.

1431. Muaūpoko Tribal Authority was contacted during the pre-referral process and subsequently invited to meet to discuss the Project. Muaūpoko responded in September 2026, expressing an interest in meeting with the Project team and discussing its involvement in the development. While a hui could not be arranged prior to lodgement, a meeting has been scheduled for early November 2026.

1432. Accordingly, none of the iwi or hapū groups consulted has expressly elected not to respond to consultation. Further engagement will continue as the Project progresses through the Fast-track process

11.1.6 MONITORING – SCHED 5, CL 6(1)(G)

1433. Clause 6(1)(g) requires the following information be provided:

> *(g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved:*

1434. Various monitoring measures are proposed depending on the potential adverse effects associated with the activity. These are addressed in the relevant assessments that follow and the supporting technical reports, and are summarised in **Table 18** below. Monitoring will be undertaken by suitably qualified and experienced persons, relevant contractors and specialists, and mana whenua, as appropriate to the activity being monitored.

TABLE 18: SUMMARY OF PROPOSED MONITORING

MONITORING	PROPOSED MONITORING MEASURES AND RESPONSIBILITY
Erosion and sediment control	Weekly inspections of erosion and sediment control measures, inspections before and after trigger rainfall events, and regular site audits until the relevant earthworks areas are stabilised. Monitoring will be undertaken by the contractor and suitably qualified environmental personnel in accordance with the certified ESCP.

TABLE 18: SUMMARY OF PROPOSED MONITORING	
MONITORING	PROPOSED MONITORING MEASURES AND RESPONSIBILITY
Construction water quality	Rainfall-triggered monitoring of discharges from sediment control devices and receiving water quality, including turbidity monitoring and investigation of exceedances. Monitoring and reporting will be undertaken by suitably qualified environmental personnel in accordance with the GWRC conditions.
Chemical treatment	Regular testing and monitoring of chemical treatment systems, including treatment performance, with fortnightly reporting and periodic review where chemical treatment is required. Monitoring will be undertaken by suitably qualified personnel.
Groundwater	Baseline groundwater level monitoring to establish seasonal groundwater conditions and inform the detailed design of soakage systems and dewatering requirements. Monitoring will be undertaken by suitably qualified engineering or groundwater specialists in accordance with the Groundwater Monitoring Plan.
Wetland compensation	Monitoring of the establishment and performance of the proposed compensation wetlands, including wetland extent, vegetation establishment, indigenous species composition, wetland condition, groundwater levels, inundation patterns and pest management. Monitoring will be undertaken by suitably qualified ecologists and other relevant specialists under the Wetland Management Plan.
Wetland compensation performance	Annual monitoring reports and formal performance reviews at years 3, 5, 10 and 15 to assess achievement of the required ecological outcomes and biodiversity compensation targets. Monitoring findings will inform adaptive management and further enhancement measures where required.
Wharemaukū Stream restoration	Annual monitoring of riparian planting, plant survival, canopy cover, habitat condition and weed and pest management for a minimum of five years. Monitoring will be undertaken by suitably qualified ecologists in accordance with the Wharemaukū Stream Restoration Management Plan.
Freshwater fauna and fish passage	Ecological supervision of fish recovery and relocation during streamworks, together with ongoing inspection and maintenance of culverts and other structures to confirm fish passage is maintained. Monitoring will be undertaken by suitably qualified freshwater ecologists and relevant infrastructure maintenance personnel.
Stormwater infrastructure	Regular inspections of stormwater treatment and attenuation devices, including rain gardens, swales, inlets and outlets, sediment accumulation, vegetation condition and device performance. Monitoring will be undertaken by suitably qualified stormwater personnel or the responsible maintenance provider.
Stormwater maintenance reporting	Quarterly maintenance reporting for the first two years following construction, followed by annual reporting in years three and four, in accordance with the proposed GWRC conditions.
Avifauna	Pre-clearance checks for nesting indigenous birds and ecological supervision where active nests are identified. Monitoring will be undertaken by suitably qualified ecologists in accordance with the Bird Management Plan.
Lizards	Pre-clearance surveys, salvage and relocation monitoring, and post-release monitoring and reporting in accordance with the Lizard Management Plan and the separate DOC wildlife approval. Monitoring will be undertaken by suitably qualified herpetologists.
Landscape planting	Monitoring of streetscape and reserve planting establishment, including plant survival, maintenance and replacement planting during the specified maintenance periods. Monitoring will be undertaken by the landscape contractor or suitably qualified landscape personnel.
Geotechnical construction	Observation, testing and certification during earthworks, ground improvement, fill placement and slope stabilisation, including compaction testing and geotechnical completion reporting. Monitoring will be undertaken by a suitably qualified geotechnical professional.
Construction traffic and road condition	Pre- and post-construction road condition surveys, together with road safety audits and inspections associated with road construction. Monitoring will be undertaken by suitably qualified transport and engineering personnel.

TABLE 18: SUMMARY OF PROPOSED MONITORING	
MONITORING	PROPOSED MONITORING MEASURES AND RESPONSIBILITY
Cultural and kaitiaki monitoring	Opportunities for Te Ātiawa and Puketapu Hapū to undertake kaitiaki monitoring during culturally sensitive works, including works affecting wetlands, waterways and archaeological material. Cultural monitoring of wetland and stream restoration outcomes will also be undertaken in accordance with the proposed Cultural Landscape and Kaitiaki Monitoring and Management Strategy, including monitoring of agreed cultural indicators and reporting of findings.

1470. The monitoring requirements identified above have informed the proposed conditions of consent set out in **Appendix 3** of this Application. These conditions establish the relevant monitoring responsibilities, reporting requirements and, where necessary, procedures for responding to monitoring results and implementing additional management measures.

11.1.7 EFFECTS ON PROTECTED CUSTOMARY RIGHTS – SCHED 5, CL 6(1)(H)

1471. Clause 6(1)(h) requires the following information be provided:

> *(h) an assessment of any effects of the activity on the exercise of a protected customary right.*

1472. Protected customary rights are defined in section 4 of the FTAA as:

> *(a) a protected customary rights area as defined in section 9(1) of the Marine and Coastal Area (Takutai Moana) Act 2011; or*
>
> *(b) an area in which a protected customary activity, as defined in section 9 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, is recognised under that Act*

1473. As outlined earlier in this application:

- The Project is not located within or adjacent to any marine and coastal area and therefore will not affect applicant groups with applications for a customary marine title under the Marine and Coastal Area (Takutai Moana) Act 2011.
- The Project is not located within or adjacent to, and will not directly affect, ngā rohe moana o ngā hapū o Ngāti Porou.

1474. There are therefore no effects identified with regard to protected customary rights.

11.1.8 POSITIVE EFFECTS

1475. The *Economic Assessment* provided in **Appendix 37** confirms that the Proposal will provide significant positive economic and urban-development outcomes. It will enable an investment of approximately $527.5million, with direct construction activity estimated to contribute approximately $160.2million in GDP and support approximately 1,000 full-time equivalent jobs. Including indirect supply-chain effects, the total construction-related contribution is estimated at approximately $313.3million in GDP and 1,765 full-time equivalent jobs. The Proposal will also generate ongoing economic activity, with the large-format retail, specialty retail and commercial activities estimated to contribute approximately $48.8 million in GDP per annum once operational.

1476. The Proposal will address identified demand for additional large-format retail floorspace within the District. The assessment identifies an existing shortfall of approximately 6,600m² of large-format retail floorspace, increasing to approximately 18,610m² by 2045. The commercial component is therefore appropriately located as an extension of the Paraparaumu Sub-Regional Centre, rather than as a separate or competing centre. It will broaden the District's retail and service offer, increase local expenditure retention and reduce reliance on travel outside the District for goods and services.

1477. The residential component will provide approximately 593 dwellings in a supply-constrained market, increasing estimated greenfield housing capacity from approximately 6.2 years to 8.7 years. The anticipated average dwelling price of approximately $810,000 is also estimated to be approximately 13% below the average price for new-build housing in the study area. Together with the Site's proximity to existing services, community facilities and more than 11,000 jobs within a 20-minute drive, the Proposal will make a substantial contribution to housing choice, affordability and a well-functioning urban environment.

1478. The *Economic Assessment* also identifies wider flow-on benefits, including an estimated $8.9 million contribution to primary-sector GDP and support for approximately five full-time equivalent jobs. Overall, the Proposal will strengthen the role, scale, vitality and economic self-sufficiency of the Paraparaumu Sub-Regional Centre, while delivering enduring housing, employment and business benefits for the District and wider region.

SOCIAL EFFECTS

1479. The Project will deliver a range of positive social effects, arising from its integrated mixed-use nature, provision of housing, and enhancement of the Paraparaumu town centre as a sub-regional destination.

1480. A key social benefit is the creation of a more vibrant and functional town centre environment. As identified in the *Urban Design Assessment*, the existing centre lacks a clearly defined street-based 'heart' and is dominated by vehicle movement and parking. The Project responds directly to this by establishing a central node or community focal point, supported by a mix of retail, commercial, residential and open space uses. This will support day-to-day interaction, increase activity throughout the day and evening, and enhance opportunities for social and community connection.

1481. The Project also improves access to housing, employment, services and public open space within a highly accessible location. The site is located within close proximity to the train station, town centre, community facilities and public transport routes, enabling convenient access to key destinations. The *Urban Design Assessment* identifies that the development promotes a walkable, legible and well-connected environment, with strong pedestrian and cycle linkages integrated throughout the site and connecting to the wider network. This will support a more inclusive urban environment, particularly for those with limited access to private vehicles, including older persons, younger people and lower-income households.

1482. The residential component will make a meaningful contribution to housing supply and diversity within the district. The proposal includes a range of dwelling typologies, including terrace housing, duplexes and apartments, as well as the potential for a retirement village. The *Urban Design Assessment* confirms that the development seeks to provide a variety of site sizes and housing types, including more affordable options, supporting a diverse and inclusive community. This will improve housing accessibility and enable a broader cross-section of the community to live in close proximity to employment, services and public transport.

1483. The Project will also deliver public open space and recreational opportunities through the establishment of an integrated wetland, stream restoration and open space network. This large area is designed as multifunctional spaces that provide ecological mitigation and offsetting, stormwater management, and publicly accessible amenity. The *Urban Design Assessment* highlights that these features are key structuring elements of the development and will support passive recreation, walking and cycling, and connection to the Wharemaukū Stream corridor. Access to high-quality open space and natural environments is well recognised as contributing positively to physical and mental wellbeing.

1484. The Project also supports social wellbeing through the creation of a safe and legible environment. The *Urban Design Assessment* outlines that the masterplan identifies a clear street-based layout, active frontages, and strong connections between destinations, which together promote passive surveillance and user safety. The integration of a mix of uses across the site will further support activity throughout the day and night, reinforcing perceptions of safety and encouraging use of public spaces.

1485. In addition, the Project will generate both construction and long-term employment opportunities within the district as described in more detail in the *Economic Assessment.*

1486. Overall, the Project will result in positive social outcomes by improving access to housing, services, employment, and open space, strengthening the function of the town centre as a community hub, and creating a more inclusive, accessible and well-functioning urban environment.

11.1.9 EFFECTS ON NEIGHBOURHOOD AND WIDER COMMUNITY – SCHED 5, CL 7(A)

RESIDENTIAL CHARACTER AND AMENITY EFFECTS

1487. The Proposal will result in a clear change to the existing character of the Site. At present, the Site comprises a large area of predominantly undeveloped land within an otherwise established urban environment. While the Site retains some characteristics associated with its former rural use, including open grassed areas, scrub vegetation and dune landforms, it is almost entirely surrounded by established residential, commercial, civic and transport activities. The *Landscape and Visual Impact Assessment* accordingly characterises the Site as undeveloped urban land rather than rural land, noting that its zoning and planned context anticipate its transition to a substantially more intensive urban environment.

1488. That anticipated environment is particularly important when considering effects on character and amenity. The majority of the Site is zoned Metropolitan Centre Zone and is subject to the Metropolitan Centre Zone Structure Plan in Appendix 19 of the District Plan. The Structure Plan expressly anticipates the comprehensive urban development of the Site for a mixture of residential, commercial and retail activities, together with roads, reserves, stormwater management areas and other supporting infrastructure. Accordingly, retention of the Site's existing open and largely undeveloped character is not an outcome anticipated by the District Plan.

1489. This is also consistent with the broader direction of the NPS-UD, including Objective 4 and Policy 6, which recognise that urban environments develop and change over time and that changes to amenity values resulting from urban development are not, of themselves, necessarily adverse effects. In this case, a substantial degree of change is not only foreseeable but expressly contemplated by the zoning and structure plan that applies to the Site.

1490. The *Urban Design Statement* similarly identifies the Proposal as a comprehensive mixed-use extension to the existing Metropolitan Centre, with the distribution of activities deliberately responding to the different Site interfaces. In particular, larger format commercial activities are located in highly visible locations adjacent to high-traffic routes where residential activities would be less compatible, with development transitioning through smaller-scale commercial and speciality retail activities to medium-density residential development and open space. This approach is considered to provide compatible relationships between the proposed residential, commercial and open space activities and the wider Metropolitan Centre. This includes the southern boundary of the Site, where townhouse development is proposed adjacent to existing residential properties on Manawa Street, providing a more compatible residential interface..

1491. The Kapiti Expressway forms the north-western edge, Kapiti Road forms the north-eastern edge, and land associated with the existing town centre, Wharemaukū Stream corridor and KCDC land adjoins much of the southern and eastern boundaries. Commercial/light-industrial development is also established around Ihakara Street and the Site also directly adjoins two residential properties on Manawa Street at its southern end. These properties are zoned High Density Residential, reflecting their proximity to the Metropolitan Centre, although the existing residential development in this area is predominantly single-storey in character. Accordingly, the Site is generally separated from more sensitive residential receiving environments by established transport corridors, commercial activities and open space, with the exception of the small residential interface with the Manawa Street residential properties.

1492. The proposed townhouses adjoining the Manawa Street properties will introduce new development on a currently vacant site. However, this change needs to be considered in the context of the zoning and anticipated development of both sites. The adjoining properties are zoned High Density Residential, while the application Site is zoned Metropolitan Centre, which enables a range of commercial and retail activities and buildings. The existing single-storey residential character of Manawa Street therefore does not necessarily reflect the scale and intensity of development anticipated by the District Plan in this location.

1493. Importantly, the Proposal provides for residential development along this boundary rather than the larger-scale commercial or retail development that could otherwise be established within the Metropolitan Centre

Zone. The proposed townhouses represent a compatible interface with the adjoining residential properties in terms of their scale, built form and activity. The townhouses have also been designed to comply with the relevant development standards intended to manage amenity effects on adjoining properties, including the 4 m setback required from properties within a residential zone. This provides separation between the proposed buildings and adjoining residential properties and assists in managing potential effects relating to building dominance, outlook and privacy.

1494. While the townhouses will change the existing outlook and introduce additional built form along the boundary, their scale, residential use and compliance with the relevant amenity-related development standards will provide an appropriate transition between the Metropolitan Centre and adjoining residential environment. The closest sensitive residential receiving environment along the northern boundary comprises properties on the opposite side of Kapiti Road. These properties are physically separated from the Site by the road corridor and will experience a noticeable change from the existing open outlook as the Site develops. The *Landscape and Visual Impact Assessment* specifically assesses representative residential views from 94 and 51 Kapiti Road and acknowledges that the development will be readily apparent and, for residents, experienced for longer durations than for passing road users. Nevertheless, adverse visual effects from both representative viewpoints were assessed as Very Low, reflecting the existing urban context, the MCZ zoning and the substantially more intensive form of development anticipated for the Site.

1495. The proposed built form along this interface will comprise a large format retail building and smaller drive-through facilities. While the proposed large format retail building has a large building footprint, this form of development is expressly contemplated within Precinct C and is appropriate to the character of the Kapiti Road corridor. Of particular relevance, the large format building proposed along Kapiti Road is substantially lower than the 21m permitted building height enabled in the Metropolitian Centre Zone. The scale of the proposed buildings therefore needs to be considered in the context of the District Plan that anticipates considerably greater building height.

1496. The Proposal also incorporates specific measures to appropriately manage the interface along Kapiti Road. As illustrated in the *Open Space Strategy*, a landscaped interface is proposed along the frontage to soften views of the development and provide an appropriate visual edge to the road corridor. The *Urban Design Statement* specifically identifies this treatment as supporting good visual outcomes along Kapiti Road and softening views from existing residential properties on the opposite side of the road. It also records that the detailed architectural design, including cladding and the manner in which the proposed buildings address Kapiti Road, is to be subject to subsequent design review.

1497. The landscape treatment includes a low landscaped bund/landform and planting strip along the Kapiti Road frontage. These measures are not intended to completely screen the development, which would neither be realistic nor necessary within a Metropolitan Centre, but rather to soften and integrate the larger building forms, car parking and servicing areas within the streetscape. The proposed consent conditions seek to confirm detailed landscape design and implementation of these treatments, together with the subsequent detailed architectural treatment of the large format retail buildings.

1498. In accordance with the Metropolitan Centre Zone provisions, no individual vehicle access points are proposed from Kapiti Road. Access will instead be provided via the proposed signalised intersection and internal road network. While the intersection will alter the existing road environment, a connection to Kapiti Road has long been anticipated by the Structure Plan and forms part of the planned development of Precinct C. Consolidating access in this manner also enables the proposed continuous landscaped frontage to be provided along Kapiti Road.

1499. The commercial properties around Ihakara Street represent a less sensitive receiving environment. Existing development in this area is already commercial/light-industrial in character, while the wider town-centre environment contains substantial retail, commercial, parking and transport infrastructure. The *Urban Design Statement* identifies the wider context as including Coastlands, PAK'nSAVE and other large-format retail development, while the northern Kapiti Road environment is described as having a distinctly “big box” urban grain and character. The introduction of additional commercial and mixed-use development is therefore compatible with the established and anticipated character experienced from these locations.

1500. Overall, while the Proposal will result in a clear change from the Site's existing undeveloped character, this change is anticipated by the Metropolitan Centre zoning and Structure Plan. The proposed scale and intensity of development is appropriate in this context, with the Site generally separated from sensitive residential environments other than the localised interface with existing residential properties on Manawa Street. At this interface, the proposed townhouses provide a more compatible relationship with the adjoining residential activities than the larger-scale commercial development otherwise anticipated within the Metropolitan Centre Zone. Appropriate landscape and design measures incorporated into the Proposal. Overall, adverse effects on the character and amenity of the surrounding environment are acceptable.

INTERNAL RESIDENTIAL AMENITY AND URBAN DESIGN EFFECTS

1501. The Proposal will establish approximately 600 residential units across a range of housing typologies, including apartments, townhouses, duplexes, courtyard housing and standalone dwellings. The residential development has been designed as part of a comprehensive mixed-use masterplan, with consideration given to building form, residential amenity, streets and accessways, open spaces and the relationship with adjoining commercial activities.

1502. An *Urban Design Assessment* has been prepared by Lauren White of Urban Acumen (refer **Appendix 5**), supported by the *Architectural Design Statement* prepared by Athfield Architects and HMOA (refer **Appendix 6B**). These assessments consider the proposed development against the relevant Metropolitan Centre Zone provisions, Structure Plan and District Plan design guidelines. Refer summary of those assessments in the following sections.

Residential Layout, Built Form and Amenity

1503. The residential development is organised into distinct precincts, with the scale and form of housing responding to the Site's topography, surrounding activities and proposed open space network. The Town Centre Precinct accommodates more intensive apartment and mixed-use development, while the Hill and Wetland Precincts provide a range of lower-scale residential typologies. This provides an appropriate transition between commercial activities, higher-density residential development and the surrounding residential neighbourhoods.

1504. The residential layouts and building typologies have been developed with consideration given to sunlight access, privacy, outlook and outdoor living space. Building orientation, window placement, fencing and landscaping assist in managing overlooking while providing opportunities for passive surveillance of streets and shared spaces.

1505. Within the Hill Precinct, housing responds to the proposed landform and takes advantage of views towards Kapiti Island, the coast and surrounding open spaces. The Wetland Precinct has been designed to establish a positive relationship with the proposed wetland complex, with dwellings oriented to provide outlook towards these areas. Private outdoor living spaces are complemented by the extensive network of public open spaces, pedestrian connections and recreational opportunities throughout the Site.

Residential Streets and JOALs

1506. The proposed residential neighbourhoods are structured around a connected network of public roads, pedestrian routes and jointly owned access lots (JOALs). The JOALs are an integral component of the residential layout, creating smaller-scale residential laneways rather than functioning solely as vehicle accessways.

1507. Their relatively intimate scale, together with adjoining dwelling entrances, landscaping and pedestrian connections, will contribute to a distinct residential character. The use of JOALs also enables more compact housing arrangements while reducing the need for individual vehicle crossings along the public street network.

1508. The *Urban Design Assessment* identifies that dwellings have generally been designed to address either a public street or private laneway, with consideration given to pedestrian entrances, overlooking and the

relationship between private and shared spaces. Detailed design of the JOALs, including surface treatments, landscaping and lighting, will further establish their intended residential laneway character.

District Plan Development Standards

1509. The *Urban Design Assessment* considers the Proposal against the relevant Metropolitan Centre Zone development standards, including building height, height in relation to boundary, building orientation, garage placement, outdoor living space, outlook and building setbacks. While the development generally achieves the outcomes sought by these standards, a number of infringements are identified and assessed.

1510. In particular, 56 detached or duplex dwellings have garages located forward of the front building façade, comprising 26 dwellings fronting public roads and 30 fronting private laneways. Ms White acknowledges the potential for these arrangements to affect streetscape amenity but identifies design responses including glazing, canopies, balconies, landscaping and the distribution of affected dwellings throughout the development. The smaller-scale laneway environment also assists in managing these effects.

1511. Within the Town Centre Precinct, the assessment considers building height and height-in-relation-to-boundary infringements, including their implications for sunlight access, outlook and the adjoining public realm. It concludes that the proposed building forms and separation provide appropriate opportunities for sunlight access without unacceptable shading or residential amenity effects.

1512. The assessment also identifies six one-bedroom apartments with Juliet balconies that do not meet the minimum outdoor living space requirements. These are considered acceptable given the limited number of affected units, their size and orientation, and access to nearby public open spaces.

1513. Overall, the *Urban Design Assessment* concludes that the development achieves an appropriate urban design outcome notwithstanding the identified infringements. A detailed compliance schedule is included in Appendix 6A.

Residential Amenity Within the Mixed-Use Environment

1514. The Proposal will introduce residential activities alongside retail, commercial and other town centre activities, consistent with the mixed-use environment anticipated by the Metropolitan Centre Zone. The masterplan manages the relationship between these activities through the distribution of land uses, building orientation and the location of the residential precincts.

1515. Larger format retail activities are generally concentrated towards Kapiti Road and the principal transport corridors, with the Town Centre Precinct providing a transition to the predominantly residential areas.

1516. As required by the District Plan, residential activities will also be protected from noise associated with surrounding activities and transport infrastructure through acoustic insulation and ventilation requirements. The Acoustic Compliance Letter prepared by Marshall Day Acoustics addresses the applicable requirements of Rule NOISE-R14 (refer Appendix 12).

1517. Compliance will be secured through conditions requiring the relevant acoustic treatment and mechanical ventilation standards to be demonstrated during detailed building design, including for noise-sensitive activities located within 80 metres of the Kapiti Expressway. These measures will ensure appropriate internal acoustic amenity while recognising the mixed-use environment anticipated by the District Plan.

Overall Assessment

1518. The *Urban Design Assessment* demonstrates that the Proposal will provide a range of housing choices within a comprehensively designed and connected residential environment, with appropriate consideration given to privacy, sunlight access, outlook, outdoor living space and pedestrian accessibility.

1519. While some District Plan development standard infringements are proposed, these have been specifically considered and addressed through the residential layout, building design and associated landscaping. The proposed conditions will also ensure that appropriate internal acoustic amenity is achieved within the mixed-use environment.

1520. Overall, the Proposal is considered to provide an appropriate level of internal residential amenity and positive urban design outcomes, consistent with the scale and intensity of development anticipated within the Metropolitan Centre Zone and the MCZ Structure Plan.

11.1.10 PHYSICAL EFFECT ON THE LOCALITY, INCLUDING LANDSCAPE AND VISUAL EFFECTS – SCHED 5 CL7(B)

EFFECTS ON LANDSCAPE CHARACTER AND VALUES

1521. A detailed assessment of the proposals effects on landscape character and values is provided in the *Landscape and Visual Assessment* provided in **Appendix 25.** The following provides a summary of the key findings of that assessment.

1522. As further described in the assessment, the Site currently has an open and largely undeveloped character within an otherwise established and intensifying urban environment. Its principal landscape features comprise the western and eastern dune landforms, Wharemaukū Stream, associated waterways and wetlands, and the openness associated with its currently undeveloped state. The assessment recognises that the Proposal will result in a noticeable change to this existing character, but importantly notes that *"the existing undeveloped condition does not represent the anticipated long-term character of the site."*

1523. The Metropolitan Centre zoning and Structure Plan anticipate comprehensive urban development of the Site. Accordingly, the assessment assesses the effects of the change in the context of both the Site's existing landscape values and its anticipated urban environment.

1524. In summary, the assessment finds the following:

Physical landscape character:

- The Proposal will substantially alter the physical character of the Site through earthworks, modification of the existing dune landforms and establishment of a more intensive urban development pattern. The eastern dune will be removed, while the existing western dune will be substantially reworked and replaced by a new western landform extending along the Kapiti Expressway boundary. The LVIA recognises that this will result in the loss and modification of existing dune landform values, with the proposed western landform differing from the existing dune in its extent, shape and profile. However, the new landform will establish a recognisable landscape feature along the Expressway boundary, with its irregular profile, native planting and integration with the wider open-space network intended to provide landscape structure and reinforce the Site's coastal character.

Wharemaukū Stream and freshwater features:

- The Wharemaukū Stream will be retained in its existing alignment, rather than relocated, and enhanced through riparian planting and localised variation in channel depth and substrate. As further described in the assessment, these measures, together with the wider wetland and stormwater network, will *"strengthen ecological and landscape connections and increase the expression of freshwater processes within the site."*

Built form and open space:

- The introduction of residential, commercial and retail development will represent a significant physical change from the existing undeveloped Site. The assessment considers this change in the context of the Metropolitan Centre zoning and anticipated scale of development, together with the relationship between built form, the proposed western landform and the open-space and blue-green network. Public reserves, open spaces, playgrounds, pedestrian connections and landscape planting will establish a new landscape framework through the development.

Perceptual landscape values:

- The Site will transition from an open and largely undeveloped environment to a more enclosed and active urban environment. While this change will be readily apparent, the assessment appropriately distinguishes visibility and magnitude of change from adverse effect. It concludes that the principal adverse perceptual effects arise from modification of the dune landforms rather than from the anticipated transition to urban development itself. The western landform, Wharemaukū Stream, stormwater areas, reserves and connected open spaces will continue to provide visual relief and landscape structure within the developed Site.

Associative values:

- The Site's associative values are principally related to its remnant coastal landforms, Wharemaukū Stream and relationship with the wider Kapiti coastal environment. While these associations will change as development occurs, the assessment finds that the proposed western landform, retention and naturalisation of Wharemaukū Stream and enhancement of wetlands and open spaces will help *"maintain an expression of the site's underlying coastal landscape character within the future development."*

Cumulative effects:

- The Proposal will contribute to the ongoing urbanisation of the wider Paraparaumu town centre environment. However, that change is anticipated by the Metropolitan Centre zoning and Structure Plan and will occur within an environment already substantially modified by urban development and major transport infrastructure. The effects associated with the dune modification are principally localised to the Site.

Construction effects:

- Bulk earthworks and associated dune, stream and wetland works will result in temporary landscape effects during construction. These are assessed as Moderate adverse during the principal earthworks period but will reduce as finished landforms are established, stream and wetland enhancement works are completed, and landscape planting establishes.

1525. Overall, the *Landscape and Visual Effects Assessment* identifies that the greatest adverse landscape effects arise from the removal of the eastern dune and substantial modification of the western dune, with these effects being more pronounced at the Site level than within the wider receiving environment. The assessment identifies localised adverse natural character effects associated with the dune earthworks as Moderate, reducing to Low–Moderate overall following landscape treatment. While the Proposal will result in the loss and modification of existing dune landform values, it also provides for the establishment of a new recognisable western landform and an integrated network of waterways, wetlands, reserves, planting and pedestrian connections, which will contribute positively to the landscape character and amenity of the Site as it urbanises.

1526. Overall, adverse effects on landscape character, values and natural character are assessed as Low–Moderate, reflecting the localised dune effects in the context of the modified receiving environment, the urban development anticipated by the Metropolitan Centre Zone, and the landscape outcomes associated with the proposed open-space and ecological network.

11.1.11 EFFECTS ON VISUAL AMENITY

1527. The potential visual effects of the Project are assessed in detail in the *Landscape and Visual Assessment* at Appendix 25. The assessment considers representative public viewpoints and visually sensitive receptors surrounding the Site, including nearby residents, users of the Wharemaukū Stream corridor, visitors to the Kapiti WW1 Soldiers' Memorial, and users of the surrounding road network. The visual study area extends to approximately 1.75 km to account for the potential visibility of the proposed 38m building.

1528. As further described in the assessment:

- The Project will result in a clear and noticeable change from the Site's existing predominantly open and undeveloped appearance, replacing this with residential and commercial development, roads and associated infrastructure. However, this change will occur within the context of the sites Metropolitan Centre zoning, where comprehensive and more intensive urban development is anticipated by the District Plan and Structure Plan.

- The proposed earthworks will alter the existing dune landforms. Along the western part of the Site, the new western landform, together with associated native planting and landscape treatment, will provide landscape structure, screening and separation between the development and the Kapiti Expressway. Importantly, the assessment does not rely upon this landform or planting providing complete screening of the development.

- The proposed open-space and landscape framework, including enhancement of the Wharemaukū Stream corridor through native riparian planting, will assist in integrating the development into its receiving environment. As planting establishes, the assessment identifies that this will improve the landscape amenity and structure of the stream corridor, while recognising that built development will remain visible.

- For the closest residential and recreational receptors, the magnitude of visible change will be substantial in some locations because built development will replace a predominantly open foreground. The assessment nevertheless assesses residual adverse visual effects from the representative nearby viewpoints as generally Low or Very Low, reflecting the planned Metropolitan Centre context, surrounding urban environment and integrated landscape/open-space framework.

- From the Kapiti Expressway, views will generally be partial and fleeting. The modified dune and new western landform and associated landscape treatment will provide separation between the Expressway and development, with adverse visual effects assessed as Very Low.

- The proposed 38m building will introduce a new vertical element and will be visible from some more distant locations. The assessment specifically assesses its visibility rather than assuming intervening development will screen it. Effects range from Very Low to Low for most more distant viewpoints, with a Low-Moderate adverse effect identified from the Milne Road area west of the Expressway. The assessment concludes that, subject to appropriate articulation of the upper building and integrated treatment of rooftop plant, the building will be read within the wider Paraparaumu urban and Metropolitan Centre context.

- Construction-related visual effects will be greatest for nearby residential and recreational receptors during the main earthworks phase and are assessed as Moderate adverse at the closest locations. These effects will be temporary and will progressively reduce as finished landforms, roads, waterways and landscape planting are established.

1529. Overall, the assessment concludes that, while the Project will result in an evident transition from an open and largely undeveloped Site to a comprehensively developed urban environment, that change is consistent with the planned Metropolitan Centre context. With the proposed landscape and open-space framework, modified dune and new western landform, stream enhancement and identified mitigation measures, the resulting adverse visual effects are generally assessed as Low or Very Low, with a localised Low-Moderate effect associated with views of the proposed 38m building from the west.

11.1.12 SPECIFIC EFFECTS RELATING TO DUNE MODIFICATION AND REMOVAL

1530. As set out in the *Statutory Assessment* in **Appendix 2**, MCZ-R15 provides for earthworks and new buildings and structures within the Dune Protection Area identified in the Structure Plan as a Restricted Discretionary Activity, subject to compliance with the specified standards. The Proposal does not comply with all of these standards and therefore does not qualify for Restricted Discretionary Activity status under MCZ-R15.

1531. Notwithstanding this, the matters of discretion under MCZ-R15 remain relevant to the assessment of the proposed dune modification and removal, as they specifically identify the matters the District Plan considers relevant to earthworks and development within the Dune Protection Area. These matters are:

1. *Effects on ecological values.*

2. *Effects on amenity and landscape values and the extent to which the dune landform and natural character are protected or retained.*

3. *The extent to which earthworks are necessary to facilitate the efficient development of land within Precinct C.*

4. *Effects on the pattern of development within Precinct C, including benefits associated with efficient development of the land.*

5. *Measures to mitigate or offset adverse effects on landscape and amenity values or to address potential soil erosion.*

6. *The profile and surface treatment of any excavated or filled area and the integration of excavated or filled areas with the natural landform.*

7. *The layout of roads, walking and cycling routes and the location of infrastructure services and stormwater management areas.*

8. *The location and finished appearance of any building.*

9. *The matters referred to in Policies MCZ-P1 and MCZ-P2.*

1532. The proposed earthworks will result in substantial modification of the existing dune system. The eastern dune will be removed, while the western dune will be removed with a new landform extending westwards along the Kapiti Expressway boundary. The resulting landform will therefore differ substantially from the existing dune in terms of its extent, shape and profile.

1533. The resulting loss and modification of the existing dune landforms is expressly recognised in the *Landscape and Visual Impact Assessment* prepared by DCM Urban as an adverse landscape and natural character effect.

1534. In relation to the necessity for the earthworks, the assessment concludes that:

> *"Retention of the existing dune landforms in their current extent and configuration would significantly constrain the developable area, urban structure and connections across the site and the ability to achieve the development outcomes anticipated for Precinct C."*

1535. The proposal seeks to introduce a recognisable landform adjoining the Kapiti Expressway. As described by DCM, the proposed western landform is intended to form part of the wider landscape and open-space framework rather than functioning solely as an engineered screening bund. Its form and native planting, together with its relationship with adjoining development and open space, will establish a coherent landscape element along the Expressway edge.

1536. The wider development layout also integrates the modified landform with roads, walking and cycling routes, stormwater and wetland areas, open space and planting. The assessment concludes that the proposed landform design, planting and wider landscape response will *"manage and mitigate the resulting landscape and visual effects and integrate the modified topography into the anticipated urban environment."*

1537. Accordingly, while the proposal will result in a noticeable change to the existing dune landforms, the earthworks are necessary to facilitate the development anticipated for Precinct C and have been designed to establish a new western landform integrated with the wider development and appropriately manage the resulting landscape, amenity and natural character effects. The proposal is therefore considered to appropriately address the matters of discretion under MCZ-R15.

1538. The practicability of retaining the existing dune landforms, including the implications for the development layout, infrastructure, stormwater management and the outcomes anticipated for Precinct C, has been

considered in detail in the District Plan assessment section of this application (Section 13.1.7). That assessment also addresses the relevant District Plan policy framework, including the requirement to protect dune landforms where practicable.

1539. The proposed removal of the existing dune landforms will result in changes to the landscape, natural character and cultural values associated with the Site. While the existing dunes contribute to the character of the Site and its connection to the wider coastal environment, DCM Urban concludes that, having regard to the proposed landscape treatment and anticipated urban environment, the overall adverse landscape effects will be Low–Moderate. Natural character effects associated with the dune earthworks are assessed as Moderate locally, reducing to Low–Moderate overall following mitigation, while residual visual effects range from Very Low to Low–Moderate.

1540. The cultural effects associated with dune removal are also acknowledged. As identified in the *Interim Cultural Impact Assessment*, the dunes form part of a wider ancestral cultural landscape, and their removal remains a concern for mana whenua. The proposed landscape and ecological enhancements will contribute to the wider environmental outcomes for the Site, although these measures do not necessarily address all cultural effects identified by mana whenua.

1541. The practicability of retaining the existing dune landforms has been considered in detail in the earlier dune avoidance assessment in the District Plan assessment in Section 13 below. That assessment addresses the relevant District Plan policy framework, including the requirement to protect dune landforms where practicable, and the engineering, infrastructure and development constraints affecting their retention.

1542. Overall, while the removal of the existing dunes will result in permanent changes to the Site, the proposed landform, indigenous planting and wider landscape and ecological enhancements will appropriately manage the resulting landscape and visual effects. DCM Urban concludes that the adverse landscape and visual effects will be no more than Minor. Having regard to these findings, the assessment of practicable avoidance options and the integrated development outcomes anticipated for Precinct C, the proposed dune earthworks are considered appropriate. The cultural effects identified by mana whenua are acknowledged and remain relevant to the overall consideration of the Proposal.

TRAFFIC GENERATION EFFECTS

1543. The traffic generation and associated effects on the surrounding transport network have been assessed by Stantec in Section 8 of the *Integrated Transport Assessment* provided in Appendix 22. The assessment considers the anticipated traffic demands associated with the full development of the Site, including the proposed residential, commercial and retail activities, and the ability of the proposed and surrounding road network to accommodate those demands.

1544. Of particular relevance, the assessment has been undertaken using KCDC's district-wide KTM4 strategic transport model, supplemented by detailed SIDRA intersection modelling. As outlined in Section 8.1 of the assessment, this modelling approach was directed by KCDC and undertaken by Transport Futures Limited, which operates the KTM4 model on Council's behalf. Stantec notes that this approach mirrors the methodology previously adopted by KCDC to inform the District Plan review and the Metropolitan Centre Zone zoning and MCZ Structure Plan.

Modelling Assumptions and Scenarios

1545. The assessment adopts 2036 as the future assessment year and considers the anticipated traffic demands associated with 100% development of the Site. Importantly, the modelling accounts for the development traffic in place of the land use assumptions previously included for the Site in the KTM4 model, rather than simply adding the proposed development traffic to an existing forecast that already provides for development of the Site.

1546. As Stantec explains in Section 8.1:

> *"the forecast development traffic is therefore not simply added to an existing model assumption that the Site remains undeveloped."*

1547. This is particularly relevant given that the comprehensive development of Precinct C for residential, commercial and retail activities has long been anticipated by the District Plan. The transport demands arising from the Proposal therefore need to be considered in the context of the planned urban development of the Metropolitan Centre, rather than against an assumption that the Site would remain undeveloped.

1548. The *Integrated Transport Assessment* assesses three future traffic scenarios for both the weekday AM and PM peak periods, comprising the 2036 Do Minimum scenario with the Town Centre Link Road in place, full development of the Site with the proposed transport infrastructure, and a further scenario incorporating the future Ihakara Street Extension/Airport Link Road.

1549. The modelling also reflects KCDC's direction regarding the future road network, including the exclusion of the proposed vehicular connection between Road 3 and Iver Trask Place. While this connection forms part of the proposal, KCDC will ultimately be responsible for determining the timing of its delivery, which remains uncertain. Accordingly, a conservative approach has been adopted by excluding this connection from the traffic modelling, rather than assuming it will be available to accommodate development traffic. The modelling therefore demonstrates that the proposed transport network can appropriately accommodate the traffic generated by the Proposal without relying on the completion of the Iver Trask Place connection. The assessment also assumes a connection between Road 2 and Brett Ambler Way, consistent with KCDC's direction regarding the future road network.

Traffic Generation

1550. Section 7 of the assessment sets out the traffic generation assumptions adopted for the proposed residential, commercial and retail activities. These have been informed by recognised industry guidance, including the Trips Database Bureau, NZTA Research Report 453, the Institute of Transportation Engineers Trip Generation Manual and surveys of comparable developments undertaken by Stantec.

1551. As summarised in Table 7-1 of the assessment, the full development of the Site is forecast to generate approximately:

- 1,118 vehicle movements during the weekday AM peak hour; and
- 1,761 vehicle movements during the weekday PM peak hour.

1552. The weekday PM peak is identified as the critical assessment period, reflecting the overlap between commuter, residential and retail traffic demands. Nevertheless, both peak periods have been assessed.

1553. Importantly, not all traffic associated with the commercial and retail activities will represent additional vehicle movements on the surrounding transport network. As explained in Section 7.2 of the ITA, the assessment distinguishes between primary trips and secondary trips, including pass-by and diverted trips. These movements remain relevant to the assessment of access intersections and internal circulation but do not necessarily represent additional traffic across the wider network. This distinction is particularly relevant given the Site's location within the established Paraparaumu town centre.

1554. In relation to the residential component, the assessment adopts a blended generation rate of 0.6 vehicle movements per dwelling during both peak periods, reflecting the proposed mixture of apartments, townhouses, duplexes and standalone dwellings. This is supported by Stantec's surveys of comparable medium-density residential developments, together with the Site's proximity to existing employment, retail, community facilities and public transport.

1555. Table 7-2 of the assessment identifies adopted pass-by proportions of 25% for large format retail, 33% for supermarkets, 35% for small retail and 40% for drive-through activities. These allowances recognise the relationship between the proposed activities and existing travel patterns, rather than treating every retail visit as an entirely new trip on the surrounding network.

The proposed consent conditions require the preparation of a Large Format Retail – Transport and Servicing Confirmation Report to confirm that the final activity and tenant mix remains within the transport effects envelope assessed in the ITA. Where any proposed changes would generate traffic movements or

transport effects exceeding those assessed and authorised by the consent, a variation to the resource consent or a new resource consent would be required, supported by further transport assessment.

Effects on the Surrounding Transport Network

1556. Section 8 of the assessment assesses the performance of the proposed Town Centre Link Road and the surrounding transport network, including the Kapiti Road intersections between the Expressway interchange and Rimu Road, and Rimu Road through to Ihakara Street.

1557. The modelling identifies that the new Town Centre Link Road will accommodate both development-related traffic and a proportion of existing town centre traffic that currently uses Kapiti Road and Rimu Road. Accordingly, the proposed road will serve a wider transport function than simply providing access to the development, consistent with its identification as a strategic connection in the MCZ Structure Plan.

1558. The proposed intersection arrangements have been developed and refined through the transport modelling to accommodate the anticipated traffic demands associated with the full development of the Site, together with wider network traffic. In particular, the design of the Kapiti Road/Arawhata Road/Link Road intersection provides for additional approach lanes on Arawhata Road and the proposed Link Road, together with a dedicated right-turn lane from Kapiti Road into the Site. These arrangements form part of the proposed road design and have been incorporated into the assessment of future network performance.

1559. The results of the SIDRA modelling are summarised in Tables 8-1 and 8-2 of the assessment. Of particular note:

- During the AM peak, the Kapiti Road corridor intersections are forecast to operate at an overall Level of Service (LoS) C or better, with the exception of the Kapiti Road/Arawhata Road/Link Road intersection, which is forecast to operate at LoS D with full development traffic included, compared with LoS C in the Do Minimum scenario.

- During the PM peak, the surrounding Kapiti Road intersections are forecast to continue operating at an overall LoS C or better. The Kapiti Road/Arawhata Road/Link Road intersection is forecast to operate at LoS D, compared with LoS C in the Do Minimum scenario.

- The proposed internal signalised intersections between the Link Road and Roads 2 and 3 are forecast to operate at LoS C during both peak periods.

1560. As explained in Section 8.1.3 of the assessment, an overall LoS D is generally considered acceptable for signalised intersections within a town centre environment, where the need to accommodate pedestrian movements and competing traffic demands can result in increased delays for some individual turning movements.

1561. The assessment identifies increased delays for some movements, particularly at the Kapiti Road/Arawhata Road/Link Road intersection during the PM peak. The overall average intersection delay increases from 33.4 seconds in the Do Minimum scenario to 51.7 seconds with full development traffic included.

1562. The assessment also identifies a maximum modelled 95th percentile queue of approximately 293 m on the western approach to this intersection during the PM peak. Stantec acknowledges that longer queues could occasionally extend towards the adjacent Expressway interchange signals. However, the modelling indicates that these queues are expected to dissipate rather than result in sustained congestion or ongoing interference with the operation of the interchange.

1563. Of particular relevance, Stantec concludes that:

> *"occasional longer queues [...] continue to flush out and do not result in sustained network congestion."*

1564. Accordingly, while some additional delays and longer queues are anticipated during peak periods, particularly once the Site is fully developed, Stantec concludes that the proposed and surrounding

transport network can accommodate these demands while maintaining acceptable overall intersection performance.

Future Ihakara Street Extension/Airport Link Road

1565. The assessment also considers the potential transport implications of the future Ihakara Street Extension/Airport Link Road, which is identified notionally in the MCZ Structure Plan but does not form part of the current proposal.

1566. Importantly, the primary assessment of the Proposal has been undertaken without relying on the future Airport Link Road being constructed. The modelling demonstrates that the proposed Town Centre Link Road and associated intersection improvements can accommodate the anticipated traffic demands of the full development independently of that future connection.

1567. At KCDC's request, Stantec has also modelled a separate scenario incorporating the future Airport Link Road. The results demonstrate that this additional connection would provide wider network benefits by redistributing traffic between the coast and the town centre.

1568. The future Airport Link Road would therefore provide additional transport benefits beyond those delivered by the proposal itself. However, it is not required to address the traffic generation effects of the Proposal or to achieve acceptable network performance.

Traffic Generation Effects Summary

1569. Overall and in summary, the *Integrated Transport Assessment* provides a comprehensive assessment of the traffic generation and network effects associated with the full development of the Site. The modelling has been undertaken using KCDC's preferred methodology, incorporates the anticipated future growth of the wider transport network, and adopts conservative assumptions regarding the potential traffic generation of the commercial and retail activities.

1570. While the Proposal will generate additional vehicle movements and result in increased delays for some individual movements during peak periods, the modelling demonstrates that the proposed Town Centre Link Road, associated intersection improvements and surrounding transport network can appropriately accommodate those demands.

1571. This is consistent with the findings in Section 14 of the *Integrated Transport Assessment*, which concludes that:

> *"each intersection is expected to operate at an acceptable overall Level of Service D or better during both the AM and PM peak periods"*

1572. It is also acknowledged that the proposed development will deliver the long-planned Town Centre Link Road, providing an additional strategic connection through the Metropolitan Centre and improving network permeability and access to the surrounding town centre.

1573. Having regard to the findings of the *Integrated Transport Assessment*, including the proposed intersection improvements and consent conditions requiring confirmation of the final commercial activity mix, the traffic generation and associated network effects are considered acceptable. Importantly, this conclusion does not rely on the future Airport Link Road, which can be progressed separately.

ACCESS EFFECTS

1574. The proposed vehicle access arrangements are described in Sections 6 and 9 of the *Integrated Transport Assessment*, with the proposed road and JOAL typologies detailed in Section 9.2 and the associated vehicle access arrangements addressed in Section 9.4. The assessment and Table 1 of the *Statutory Assessment* also identify the relevant departures from the District Plan transport standards, including those relating to access formation, separation distances, sightlines and landscaping.

1575. The Proposal incorporates a hierarchy of public roads and private access arrangements, with the public road network providing the principal connections through the Site and a series of JOALs providing access to residential lots and communal parking areas. The access arrangements have been developed having regard to the anticipated residential and commercial activities, the intended function of each road and accessway, and the higher-density urban form anticipated within the Metropolitan Centre Zone.

Jointly Owned Access Lots

1576. The Proposal includes a series of private JOALs providing shared vehicle access to rear residential lots, townhouse developments and apartment parking areas. These are described in Section 9.2.4 of the assessment, with the proposed typologies and dimensions identified in the road hierarchy table in Section 9.2.

1577. The JOALs have been designed to reflect their intended function as private residential accessways rather than public roads. As explained by Stantec, the adopted approach is to provide a 4.5m carriageway where six or fewer lots are served and a minimum 5.5 m carriageway where more than six lots are served. This allows for occasional opposing vehicle movements and is consistent with the intent of NZS 4404:2010.

1578. Four JOAL typologies are proposed, reflecting the different residential access requirements across the Site:

- Type 1 (JOALs A, B, C, G, I, J and K): Generally 5.5m carriageways within legal widths ranging from 7m to 10 m, with provision for berms, parking or intermittent landscaping.
- Type 2 (JOALs D, E, F and part of G): 4.5m carriageways within 6m legal widths, principally serving smaller groups of residential lots.
- Type 3 (JOALs H, L and M): 5.8m carriageways within 6m legal widths, providing access to apartment parking areas.
- Type 4 (rear laneways): 5.8m carriageways within 6m legal widths, providing rear access to residential properties.

1579. Regarding carriageway widths, Stantec notes that the proposed 4.5m carriageways are wider than the 2.75–3.0 m carriageways generally anticipated under NZS4404 for smaller private accessways. This additional width provides greater space for vehicle manoeuvring at individual driveways, while also improving separation between pedestrians and vehicles when using the accessways concurrently. For JOALs serving more than six dwellings, the 5.5m carriageway provides for occasional opposing vehicle movements without requiring the wider formation associated with a public road.

1580. Regarding JOAL A, particular consideration has been given to this JOAL, which incorporates an 8 m legal width and a generally 5.5 m trafficable carriageway. Although the number of dwellings served exceeds the threshold ordinarily associated with a private accessway under Council's design guidance, Stantec considers that a public Local Road corridor is unnecessary given the intended function of the JOAL. JOAL A does not provide a wider through-traffic connection and is not required to accommodate the same combination of footpaths, berms, public services and on-street parking as a public road.

1581. Stantec has also considered the anticipated traffic volumes using JOAL A, recognising that some residents have alternative access routes via JOALs B and C. On this basis, the busiest northern section of JOAL A is expected to accommodate movements equivalent to approximately 25 dwellings. Applying the blended residential trip generation rate of 0.6 movements per dwelling per hour, this equates to approximately 15 vehicle movements during the peak hour. Stantec considers this to be low level of activity supports the proposed private laneway arrangement and does not warrant the provision of a public road formation.

1582. For the longer Type 1 JOALs, including JOAL A, intermittent landscaped buildouts are proposed to locally narrow the trafficable carriageway and encourage lower vehicle speeds. As explained by Stantec, these are deliberate design features intended to reinforce the low-speed residential laneway environment, with vehicles yielding to one another at the narrower sections. The proposed arrangement is therefore intended

to manage vehicle speeds rather than provide an unrestricted two-way carriageway along the full length of each JOAL.

1583. With regards to JOAL G, the initial section of JOAL, extending from Road 6, serves nine dwellings and incorporates a 5.5m carriageway. The access subsequently narrows to 4.5m where it serves the remaining six lots. This arrangement reflects the reduction in vehicle movements along the JOAL and is consistent with the adopted approach to accessway widths.

1584. With regards to pedestrian movements, the JOALs are intended to operate as shared pedestrian and vehicle environments, consistent with their private residential access function. Separate footpaths are not proposed within the JOAL corridors. Rather, Stantec considers that the available carriageway widths, low anticipated traffic volumes and proposed traffic-calming measures are intended to provide for pedestrians and vehicles to share the accessways safely.

1585. With regards to vehicle manoeuvring and servicing, the JOALs will principally accommodate residential light vehicles, with occasional delivery and servicing vehicles. Stantec notes that the safe operation of these accessways depends on the available trafficable width, access geometry, turning areas and vehicle tracking, rather than legal width alone. Vehicle tracking undertaken as part of the ITA, including the private waste collection vehicle tracking provided in Appendix B, demonstrates that the proposed access arrangements can accommodate the anticipated servicing movements.

1586. While the proposed JOAL arrangements depart from aspects of Council's preferred accessway dimensions, Stantec considers that the suitability of the proposed widths needs to be assessed having regard to their actual function and anticipated use. In particular, increasing the legal width of a private JOAL to that of a public road would not necessarily improve its safety or operation where the proposed carriageway, passing arrangements and manoeuvring areas are sufficient to accommodate the anticipated movements.

1587. Overall, Stantec considers that the proposed JOAL arrangements are appropriate for the anticipated residential development. The proposed widths and configurations have been developed having regard to the number of dwellings served, anticipated vehicle movements, servicing requirements and the intended low-speed residential environment. Subject to the detailed design requirements secured through the proposed consent conditions, the associated access and safety effects are considered acceptable.

Individual Vehicle Accesses and Manoeuvring

1588. The proposed residential development incorporates a combination of direct vehicle access from public roads and shared access via JOALs. Rear-lane access has been incorporated throughout the development where practicable, although some higher-density residential typologies require direct frontage access.

1589. As identified in Table 6-1 of the *Integrated Transport Assessment*, some individual vehicle accesses will not comply with the formation width, separation distance and sightline requirements under the relevant TR-R3 standards of the District Plan. These departures principally reflect the proposed residential lot configuration and the need to accommodate vehicle access within a compact urban development.

1590. In relation to vehicle manoeuvring, some residential lots will require vehicles to reverse between individual driveways and adjoining public roads. The District Plan expressly contemplates reversing movements onto Neighbourhood Access Routes, recognising their lower traffic volumes and local access function. As outlined by Stantec, the adjoining residential roads are anticipated to accommodate fewer than 100 vehicle movements per hour, such that the potential for conflict between through traffic and vehicles manoeuvring at individual driveways is relatively low.

1591. Requiring on-site turning for every dwelling would also have significant implications for residential lot sizes, building configurations and the efficient use of land within the Metropolitan Centre Zone. In this context, the proposed arrangements are considered appropriate for the anticipated residential typologies.

Access Separation and Sightlines

1592. The *Integrated Transport Assessment* and *Statutory Assessment* identify several departures from the minimum vehicle access separation distances and sightline requirements under TR-R3.

1593. Of particular note, a proposed JOAL access onto Road 2 is located approximately 23m from the signalised Link Road intersection, compared with the 30m separation required under the District Plan. As outlined in Table 6-1 of the ITA, this access has been designed as exit-only to minimise potential turning conflicts with vehicles using the intersection.

1594. Some individual residential accesses may also be unable to achieve the prescribed separation distances or sightlines, particularly where located near intersections or bends in the internal road network.

1595. The draft KCDC consent conditions include requirements for the location and design of vehicle accesses to be confirmed at detailed design stage, including assessment of sightlines against appropriate safe stopping sight distances and provision for necessary design refinements.

1596. The proposed landscaping provisions also restrict fencing within residential front yards to a maximum height of 1.2m (as required in the On-Lot Landscaping Plan consent condition), assisting in maintaining visibility between vehicles and other road users.

1597. These measures are considered to appropriately address potential safety effects associated with the identified access infringements.

Access Landscaping

1598. The *Integrated Transport Assessment* identifies that the Proposal does not achieve the full landscaping separation required under TR-R3 between all non-residential parking or loading areas and adjoining sites.

1599. As explained in Table 6-1 of the assessment, these departures principally relate to the Town Centre Precinct, where commercial and residential activities are intended to be integrated within a higher-density mixed-use environment.

1600. The proposed approach reflects the anticipated urban character of the Metropolitan Centre Zone, with landscaping incorporated throughout the development rather than uniformly along every activity boundary. The final landscaping arrangements will also be subject to detailed design, including the requirement to maintain appropriate visibility at vehicle accesses.

1601. Accordingly, the identified departures are not considered to result in adverse access that are more than minor or safety effects.

Summary of Access Effects

1602. The proposed access arrangements have been developed to accommodate the anticipated residential and commercial activities within the Site, while reflecting the compact urban form and integrated movement network anticipated by the Metropolitan Centre Zone.

1603. Although several departures from the District Plan's prescribed access standards are identified, the *Integrated Transport Assessment* demonstrates that the proposed arrangements have been considered having regard to the function of the adjoining roads and JOALs, anticipated traffic volumes, vehicle manoeuvring requirements and the safety of pedestrians and other road users.

1604. In particular, the proposed JOAL widths are considered appropriate for their intended private residential access function, with the wider carriageways, traffic-calming measures and vehicle tracking providing for the anticipated vehicle movements and servicing requirements.

1605. The draft KCDC consent conditions provide for further confirmation of the detailed access arrangements, including vehicle crossing locations, sightlines, manoeuvring, vehicle tracking and JOAL design.

1606. Having regard to the findings of the assessment and the proposed conditions, the adverse effects associated with vehicle access and manoeuvring are considered acceptable.

EARTHWORKS AND CONSTRUCTION EFFECTS

1607. The Project involves earthworks and construction activity across the Site to enable the proposed comprehensive development. This includes bulk cut and fill, removal and modification of the existing dune landforms and formation of the new western landform, excavation of the proposed wetland and flood storage areas, construction of roads and three waters infrastructure, and works associated with the proposed stream crossings.

1608. Given the scale of these works, construction has the potential to result in temporary adverse effects associated with erosion and sediment generation, dust, noise and vibration, construction traffic, dewatering, works adjacent to waterways and general construction activity.

1609. An Earthworks and Construction Management Plan (ECMP) has been prepared by Envelope Engineering and is provided in Appendix 16. The ECMP has been developed to establish the overarching framework and measures for managing these potential earthworks and construction effects throughout the construction period. As further detailed in the ECMP, the key measures include:

- Staging and progressive stabilisation of earthworks to minimise the extent and duration of exposed ground, including specific controls for works undertaken adjacent to Wharemaukū Stream and within the proposed wetland area;
- Implementation of erosion and sediment controls in accordance with the relevant GWRC guidance, including clean-water diversions, sediment retention ponds, decanting earth bunds, silt fences and additional controls where required adjacent to sensitive receiving environments;
- Management of dust effects through measures including minimising exposed areas, water application, management of haul routes and vehicle speeds, stabilisation of stockpiles and disturbed areas and additional controls where necessary;
- Measures to prevent and manage the tracking of sediment and debris onto the surrounding road network, including stabilised construction entrances and cleaning of public roads where required;
- Regular inspection, monitoring and maintenance of erosion and sediment controls, including inspections following significant rainfall events and ongoing compliance monitoring; and
- Procedures for receiving, investigating and responding to construction-related complaints, with corrective measures implemented where required.
- Implementation of a staged bulk earthworks methodology, including progressive removal of the existing dunes, excavation of the wetland compensation area and placement of unsuitable material within the proposed western landform. Earthworks within the wetland area will proceed incrementally, with a recommended maximum of 2 ha of unstabilised excavation immediately adjoining Wharemaukū Stream;
- Management of groundwater and construction dewatering through staged excavation, bunded collection areas, reuse of water where practicable and appropriate treatment prior to discharge;
- Construction water quality monitoring within Wharemaukū Stream, including upstream and downstream turbidity monitoring, inspections following significant rainfall events and corrective actions where construction-related discharges are identified.

1610. Consideration has been given to the proximity of earthworks to Wharemaukū Stream and the proposed wetland and flood storage areas. The ECMP provides for staged earthworks, progressive stabilisation and specific erosion and sediment controls in these areas to minimise the potential for sediment-laden runoff to enter the Stream or other receiving environments. In particular, the wetland excavation will be undertaken progressively from the western end, with a buffer maintained between the excavation and

Wharemaukū Stream. Temporary stream diversions required for the road crossings will be undertaken in accordance with a detailed methodology, with input from the Project Ecologist.

1611. The draft KCDC and GWRC consent conditions, provided in **Appendix 3**, incorporate the Councils' standard earthworks and construction management conditions, including the preparation and certification of a final ECMP and detailed erosion and sediment control plans prior to the commencement of the relevant works, together with requirements relating to staging, stabilisation, monitoring, maintenance and implementation of construction controls. The final plans will therefore be able to respond to the detailed construction methodology, staging and contractor arrangements once these are confirmed.

1612. Accordingly, the draft ECMP establishes the overall framework for managing earthworks and construction effects, while the proposed consent conditions provide for the subsequent preparation, certification and implementation of the detailed management plans and controls necessary to give effect to that framework.

1613. Overall, while the scale of earthworks and construction will result in temporary disturbance and associated effects, these effects can be appropriately managed through the measures identified in the draft ECMP and the detailed management plans and erosion and sediment controls required by the proposed KCDC and GWRC consent conditions. The staged construction methodology, specific controls for works adjacent to Wharemaukū Stream, and proposed monitoring and response procedures provide further assurance that potential sediment and water quality effects can be appropriately managed. On this basis, adverse earthworks and construction effects are considered to be appropriately managed and acceptable.

Groundwater and Hydrological Effects Associated with Bulk Earthworks

1614. The potential effects of the proposed earthworks and changes to the existing landform on groundwater conditions have been assessed in the *Hydrological Effects Assessment Report* attached in **Appendix 30.**

1615. The assessment identifies that the existing sand dunes provide a higher rate of groundwater recharge than the surrounding peat-dominated areas, reflecting the greater permeability of the dune sands. The proposed earthworks, including modification and removal of the existing dune landforms, together with subsequent urbanisation, will alter existing groundwater recharge patterns and groundwater levels across the Site.

1616. WWLA has undertaken numerical groundwater modelling to assess these changes, taking into account the proposed earthworks, finished ground levels, changes in land cover and the proposed stormwater infiltration measures. The modelling predicts changes to groundwater levels generally corresponding with the proposed cut and fill areas, with the greatest reduction occurring in the area of dune removal. However, groundwater is already relatively deep beneath the existing dunes.

1617. The modelling also predicts a relatively small reduction in groundwater baseflow to the Wharemaukū Stream, averaging approximately 0.12L/s, equivalent to 0.4% of the estimated mean annual low flow. Negligible hydrological effects are predicted on neighbouring wetlands, while groundwater levels within the proposed wetland compensation area are expected to remain sufficiently shallow to support the intended wetland conditions.

Overall, while the proposed earthworks and subsequent development will alter existing groundwater recharge and groundwater levels, WWLA's assessment indicates that the resulting hydrological effects on the surrounding environment will be limited.

Construction Dewatering Effects

1618. The *Hydrological Effects Assessment Report* prepared by WWLA and provided in **Appendix 30** assesses the potential effects of temporary groundwater dewatering associated with the proposed construction works. The assessment is informed by site-specific groundwater monitoring and numerical groundwater modelling, as described in Section 6.4 of the report.

1619. WWLA has modelled the potential groundwater drawdown associated with construction dewatering, adopting a conservative scenario whereby the entire excavation area is assumed to be undertaken

simultaneously. As construction will be undertaken progressively, this represents a worst-case scenario for assessing potential groundwater drawdown.

1620. The modelling predicts that construction dewatering requirements will initially be approximately 0.94 L/s per hectare of excavation, reducing to 0.64 L/s per hectare over the first three months and eventually stabilising at a seasonally variable rate of 0.25–0.55 L/s per hectare. If the entire excavation were undertaken simultaneously, the maximum groundwater discharge is estimated at approximately 13 L/s, although WWLA considers this scenario unrealistic. While temporary groundwater drawdown is predicted within and beyond the Site, WWLA concludes that the resulting effects on neighbouring wetlands and groundwater users will be limited. WWLA also concludes in Section 9 that:

> *"Wetlands on neighbouring properties to the south are predicted to experience negligible hydrological effects from the development, including temporary construction dewatering."*

1621. WWLA explains that the limited portions of these wetlands within the predicted drawdown extent are not reliant on direct interaction with the deeper regional groundwater table. The assessment also concludes that construction-related groundwater drawdown will have *"no material effect on the continued operation of nearby groundwater bores."* The maximum predicted drawdown is approximately 3 m within the Site and 2 m beyond the Site boundary, with the greatest predicted drawdown at a neighbouring bore being 1.9 m.

1622. The proposed consent conditions also require the preparation of a Groundwater Management Plan prior to construction works requiring dewatering, including provision for monitoring and management measures where necessary to verify and respond to groundwater effects.

1623. Overall, based on the conservative modelling undertaken by WWLA, temporary construction dewatering is not anticipated to result in significant adverse hydrological effects on neighbouring wetlands or groundwater users. Accordingly, the potential adverse groundwater effects associated with construction dewatering are considered to be less than minor.

Construction Noise

1624. Construction activities have the potential to generate temporary noise effects, particularly from earthworks, construction plant and heavy vehicle movements. As addressed in the Emission of Noise section below, construction noise will be managed through proposed conditions requiring compliance with the applicable District Plan noise limits and NZS 6803:1999, restrictions on construction hours, and the preparation and certification of a Construction Noise Management Plan ('CNMP') prior to works commencing. These measures will ensure that construction noise is appropriately managed and minimised throughout the works.

CONTAMINATED LAND EFFECTS

1625. A *Preliminary Site Investigation* has been prepared by HAIL Environmental Limited to assess the potential for soil contamination across the Site and the implications of the proposed development for human health and the environment.

1626. As described in the assessment, the Site has historically been used predominantly for pastoral grazing, with more localised rural residential, farm training and firewood storage activities occurring within the central part of the Site. The Site is not recorded on the GWRC Selected Land Use Register as having been subject to a HAIL activity. However, the assessment has conservatively identified an approximately 4,600m^2 area associated with the former dwelling and hydroponics building at 77 Kapiti Road as a "piece of land" for the purposes of the NES-CS. No current or former HAIL activities were identified across the remainder of the Site.

1627. The potential contamination within this discrete area arises principally from the former buildings rather than any identified industrial or intensive land use. In particular, the former dwelling was destroyed by fire and may have contained asbestos-containing materials and, given its age, lead-based paint. The construction of the former hydroponics building is uncertain, although anecdotal evidence indicates that

some form of "board-like" material may have been used. The contaminants of potential concern identified by the assessment are therefore asbestos and lead.

1628. Potential exposure pathways during construction include the inhalation or ingestion of contaminated dust and the mobilisation of contaminated sediment in stormwater runoff. Future users of the development are also identified as potential sensitive receptors if residual contamination were to remain accessible following development.

1629. However, the proposed development involves substantial earthworks within this area, including the removal of surface material. As explained in Section 5.4 of the assessment, these works are expected to remove any residual lead and/or asbestos, if present. HAIL Environmental therefore concludes that, in the completed development:

> *"there will be no complete contaminant linkages."*

1630. Accordingly, the assessment considers that the proposed change of use is highly unlikely to pose a risk to human health.

1631. The principal potential contaminated land effects therefore arise during the earthworks and construction phase, when soil within the identified piece of land will be disturbed. Given the scale of the proposed earthworks, the permitted soil disturbance and removal thresholds under Regulation 8(3) of the NES-CS are unlikely to be met. In the absence of a Detailed Site Investigation, the soil disturbance therefore requires discretionary activity consent under Regulation 11 of the NES-CS.

1632. To manage these effects, HAIL Environmental recommends that soil sampling be undertaken within the identified piece of land to determine appropriate on-site reuse and/or off-site disposal options for excavated material, with this requirement secured through conditions of consent. This will enable the contamination status of excavated material to be confirmed before its reuse or disposal and ensure that material requiring off-site disposal is directed to an appropriately authorised facility. Consent conditions are included in the draft consent conditions to reflect this.

1633. On this basis, and in summary:

- the potential effects associated with contaminated land are localised and manageable;
- the potential source area is confined to a relatively small and specifically identified portion of 77 Kapiti Road; and,
- the contaminants of potential concern are known; and the proposed development itself will remove the principal potential source material from the future exposure environment.

Accordingly, and subject to the recommended soil sampling conditions applying to disturbance, reuse and disposal of soil from this area, adverse effects on human health and the environment associated with contaminated land are considered to be less than minor.

11.1.13 EFFECTS ON ECOSYSTEMS – SCHED 5 CL7(C)

EFFECTS ON TERRESTRICAL ECOSYSTEMS

1634. Terrestrial vegetation identified onsite can be categorised in to two categories; exotic grassland; and exotic shrubland.

1635. The exotic grassland habitat is identified as having negligible botanical value as it contains no or very low incidences of native plant species and is not representative of a naturally occurring habitat type, and has negligible ecological value.

1636. The exotic scrubland is dominated by either gorse and/or blackberry. As it is not representative of any naturally occurring habitat type it has negligible botanic value. The scrubland could provide nesting habitat for At Risk – Declining pipit and may potentially provide habitat for native skinks however it is highly unlikely

to support arboreal lizard species such as geckos. The scrubland could also provide food for native bird species, such as when the blackberry is flowering or fruiting, however birds consuming the blackberry will spread its seeds, contributing to the spread of this pest plant. Based on these factors, the ecological value of the terrestrial vegetation is considered to be low.

1637. While the proposal will see the complete loss of the exotic grassland and exotic scrubland habitats within the site, the *Assessment of Ecological Effects* considers that this will result in a low level of effect.

1638. In addition to the above loss of existing vegetation, the proposal will see approximately 15,600m² of terrestrial riparian planting along the stream and wetland corridor, as well as additional planting on the new western landform. Once established these areas of planting will have a greater ecological value than the exotic grassland and exotic scrubland habitat and will more than adequately replace the lost botanical value. The proposed planting will be of far greater ecological value for native fauna, providing improved shelter and an increase in the availability of food resources, as well as a greater amount of nesting habitat for native birds.

1639. The proposed pest control will reduce fauna predation, increase breeding success and result in increased recruitment of terrestrial fauna species utilising the habitat. Lastly, the connection of the habitat to the wetlands to the south of the site will greatly increase the overall size of contiguous native habitat within the project area.

1640. The Assessment of Ecological Effects considers that these factors will have a positive magnitude of effect and, once the proposed planting has had sufficient time to establish, result in a net gain in terrestrial ecological value across the Site.

1641. Based on the above, it is considered that the adverse effects in respect of the existing terrestrial vegetation within the site are less than minor, with positive effects arising from the proposed restoration, planting and pest management that will occur as part of the proposal.

EFFECTS ON AVIFAUNA

1642. The Site is identified as having moderate ecological values in respect of avifauna (birds). The *Assessment of Ecological Effects* identifies that the Site provides habitat for Not Threatened and At Risk – Declining native bird species, including potential breeding and nesting habitat for some species such as pūkeko. Habitat for threatened species within the Site is limited, with these species considered more likely to occur as temporary visitors or to utilise adjacent wetland habitats.

1643. The proposed works will result in the removal and modification of existing vegetation and habitat within the Site. This has the potential to result in the loss of avifauna habitat and, if vegetation clearance occurs while birds are nesting, injury or mortality to eggs, chicks or nesting birds.

1644. To manage these effects, an *Avifauna Management Plan* has been prepared and is included in the *Ecological Management Plan*. The plan will be implemented for vegetation clearance activities that pose a risk to native avifauna. The plan establishes measures to avoid injury or mortality during the works, including protocols for pre-construction nest checks and, where required, the establishment of nest/chick protection and exclusion zones. The detailed methodology for implementing these measures is set out in the AMP.

1645. In relation to habitat loss, the proposal includes substantial ecological restoration and enhancement within the Site. In particular, the restoration and enhancement of the Wharemaukū Stream and its riparian margins, together with the creation of adjacent wetland habitat and associated indigenous planting, will both replace habitat lost through the proposed works and enhance the overall biodiversity values of the Site for avifauna.

1646. On the basis that the measures contained within the AMP are implemented and the proposed Wharemaukū Stream and wetland restoration is undertaken, the *Assessment of Ecological Effects* assesses the magnitude of effects on avifauna as Low, resulting in an overall Low level of ecological effect, with no further effects management measures considered necessary.

EFFECTS ON LIZARDS

1647. The *Assessment of Ecological Effects* identifies areas of rank grassland, exotic scrub and scattered refugia within the Site as providing potentially suitable habitat for indigenous lizards. In particular, northern grass skink (*Oligosoma polychroma*) and copper skink (*Oligosoma aeneum*) have previously been recorded within 5 km of the Site. Northern grass skink is classified as Nationally and Regionally Not Threatened, while copper skink is classified as Nationally At Risk and Regionally Threatened. Both species are capable of occupying modified environments and, notwithstanding the historically modified nature of the Site, their potential presence could not initially be excluded.

1648. Targeted lizard surveys were undertaken by Bioresearches during March and April/May 2025. A total of 48 artificial cover objects (ACOs) were installed within areas of suitable lizard habitat across the Site on 26 March 2025 and left in place for a settling period of at least four weeks. The ACOs were subsequently inspected on four occasions between 28 April and 1 May 2025, during conditions considered suitable for lizard activity.

1649. The ACO surveys were supplemented by diurnal visual encounter surveys, including searches of vegetation and vegetation edges for basking lizards and active searches of potential refugia such as logs, rocks and other organic and inorganic material. In total, 192 individual ACO inspections were undertaken, together with approximately four person-hours of opportunistic habitat and visual encounter searching. No native or exotic lizards, or evidence of lizards such as scat, were detected, and no lizards had been observed during previous ecological site visits.

1650. Bioresearches considers that, if native skinks are present within the Site, their abundance is likely to be exceedingly low. Nevertheless, given the cryptic nature of native lizards and the presence of potentially suitable habitat, the Assessment of Ecological Effects adopts a precautionary approach and does not entirely exclude the possibility that a small number of native skinks may be present within areas affected by the Project.

1651. The principal potential effects are therefore the disturbance, injury or mortality of any individual native lizards that may be present during vegetation clearance and construction, together with the loss of potential habitat.

1652. To manage these effects, a draft Lizard Management Plan has been prepared and is included in the *Ecological Management Plan* in **Appendix 29**. proposed to be implemented for vegetation clearance activities across the Site. The LMP is proposed to be implemented for vegetation clearance activities across the Site,.

1653. The LMP provides for the management of any lizards encountered during the works, including their relocation to suitable retained or established habitat either within the Site or, where appropriate, at a suitable nearby relocation site.

1654. Having regard to the extensive targeted survey effort, the absence of any lizard detections and the historically modified nature of the Site, together with implementation of the LMP, the Assessment of Ecological Effects assesses the magnitude of effect on indigenous lizards as Low, resulting in an overall Low level of effect. No additional effects management measures are considered necessary.

EFFECTS ON BATS

1655. The *Assessment of Ecological Effects* identifies the potential for indigenous bats to utilise the Site, notwithstanding its highly modified character and generally poor-quality bat habitat. Both long-tailed bats (*Chalinolobus tuberculatus*) and lesser short-tailed bats (*Mystacina tuberculata*) are highly mobile species and have previously been recorded within 25 km of the Site, with the closest records approximately 9 km and 22 km from the Site respectively.

1656. The *Assessment of Ecological Effects* notes that the Site is subject to existing disturbance from noise and artificial lighting and generally provides poor-quality habitat for bats. However, long-tailed bats are known to persist within some urban parks and peri-urban environments. Potential roosting habitat within the Site is largely confined to trees within two shelterbelts and an existing open shed. The wetlands across the

Site also have the potential to support invertebrate prey and therefore provide some potential foraging habitat, although little standing water was observed during summer.

1657. Given the potential for bats to utilise these habitats, Bioresearches undertook a targeted acoustic bat survey over the 2024/2025 summer period. Five Automatic Bat Monitors (ABMs) were positioned within and adjacent to those parts of the Site considered most likely to be used by bats for commuting, foraging or roosting. The monitoring locations targeted the stormwater retention pond, existing shed, wetland habitat, shelterbelts and the Wharemaukū Stream corridor.

1658. The survey used Department of Conservation AR4 acoustic recorders, which were programmed to record from at least one hour before sunset until at least one hour after sunrise. The five monitors were deployed over an extended summer survey period, with recording continuing until individual unit batteries were depleted between late December 2024 and January 2025. This provided a considerably longer monitoring period than the standard two-week survey period. Recorded spectrograms were subsequently processed and individually assessed for bat activity. While suitable habitat for lesser short-tailed bats was not considered to be present within the Site, that species was nevertheless included when validating the acoustic recordings.

1659. Weather conditions were also assessed against Department of Conservation guidance to determine the validity of individual survey nights. Nights affected by unsuitable temperature, rainfall or wind conditions were identified, although data collected during invalid nights were still assessed. Only three nights were considered invalid due to rainfall.

1660. The resulting survey effort was substantial. The five monitoring locations provided between 24 and 44 valid survey nights each, with an average of approximately 36 valid nights of acoustic monitoring per recorder. Despite this extended survey effort across the areas of the Site offering the greatest potential for bat use, no bat passes, or other bat activity were detected at any of the five monitoring locations during the survey period.

1661. Bioresearches acknowledges that bat activity and landscape use can vary seasonally and, accordingly, the absence of detections during the summer survey does not establish that bats could never utilise the Site at another time. However, the ecological value of the Site for bats is constrained by limited habitat connectivity and roosting opportunities, existing disturbance from noise and light, degraded wetland habitat and the presence of introduced mammalian predators, including rats identified during assessment of the acoustic recordings.

1662. The Project will result in modification and removal of some of the existing vegetation and habitats identified as having potential value for bat commuting, foraging or roosting. However, the targeted acoustic surveys provide no evidence that either long-tailed or lesser short-tailed bats currently utilise the Site. In particular, no activity was detected despite monitoring being specifically targeted towards the Site's most suitable potential bat habitats and extending over a substantial number of valid survey nights during the summer activity period.

1663. Accordingly, having regard to the modified and generally poor-quality nature of the existing habitat, the limited connectivity and roosting opportunities available, and particularly the absence of any bat detections during the extensive targeted acoustic survey, Bioresearches has concluded that potential adverse effects of the Project on indigenous bats are considered to be negligible.

EFFECTS ON FRESHWATER

1664. As described in Section 6.3 of the *Assessment of Ecological Effects*, the proposed works will result in the removal and modification of existing freshwater habitats within the Site, including the removal of Drains 1–4, the piping and realignment of Watercourse 1, and the loss of existing natural inland wetlands. The works also have the potential to affect indigenous freshwater fauna, freshwater connectivity and water quality, particularly during construction. The *Assessment of Ecological Effects* assesses these effects having regard to the ecological values of the existing habitats and the magnitude of the proposed works, both before and following implementation of effects management measures.

1665. As detailed in Section 5.5 of the assessment, the freshwater environment within and adjoining the Site comprises the Wharemaukū Stream, Watercourse 1, a series of artificial drains and nine natural inland wetlands. The Wharemaukū Stream and lower reaches of Watercourse 1 have been assessed as having Moderate ecological values, while the remaining artificial drains and much of Watercourse 1 have Negligible ecological values. The natural inland wetlands have Low to Moderate ecological values, reflecting their predominantly exotic vegetation, agricultural modification and varying habitat characteristics.

1666. As outlined in Section 6.3.1.1 of the assessment, approximately 290m of the upper extent of Watercourse 1 will be piped to accommodate the proposed development. The remaining approximately 550m will be realigned through the Site, comprising approximately 300m of open swale and a further 250m flowing through the proposed biodiversity wetland before connecting with the Wharemaukū Stream.

1667. Watercourse 1 has been assessed by Bioresearches as an artificial watercourse. Accordingly, the proposed piping, diversion and transition to wetland habitat will not result in the loss of natural stream extent. Notwithstanding this, the existing watercourse provides aquatic habitat within its lower reaches, and the proposed works will result in the loss or modification of that habitat. Bioresearches has assessed the piping of the upper 290 m of Watercourse 1 as having a High magnitude of effect, while the diversion of the remaining 55 m is assessed as Moderate. The removal of Drains 1–4 is assessed as having a Very High magnitude of effect, reflecting the proportion of existing habitat that will be removed.

1668. The Wharemaukū Stream will be retained on its existing alignment, with no reclamation or diversion of the Stream proposed. This avoids the direct loss of natural stream extent. However, works will be required to establish the proposed crossings, and earthworks and vegetation clearance will occur within close proximity to the Stream, including within 8m of its banks. These activities have the potential to disturb aquatic and riparian habitats, reduce existing riparian buffering and introduce sediment into the receiving environment. Bioresearches has assessed the magnitude of effects associated with works adjacent to the Wharemaukū Stream and its vegetated margins as Moderate.

1669. In considering the effects on freshwater habitats, it is relevant that the existing artificial drains and much of Watercourse 1 have limited ecological function, reflecting their modified channel form, predominantly exotic vegetation and relatively low habitat diversity.

1670. The assessment identifies a range of measures to manage the potential effects on freshwater habitats, including freshwater fauna recovery and relocation, erosion and sediment controls, the maintenance of fish passage and freshwater connectivity, biodiversity compensation for the loss of natural inland wetlands, and restoration and enhancement of the Wharemaukū Stream. These measures are detailed in the *Ecological Management Plan*, and *Wetland Residual Effects Analysis Report*, and are discussed further below.

Freshwater Connectivity

1671. As set out in Section 6.3.2 of the *Assessment of Ecological Effects*, the upper extent of Watercourse 1 currently receives flows from an existing piped network, and the proposed piping of this reach will maintain the connection with the upstream catchment. Similarly, Drains 1–4 originate within the Site and will be removed in their entirety, meaning their removal will not isolate upstream watercourse reaches.

1672. The remaining section of Watercourse 1 will be realigned through the proposed open swale and biodiversity wetland, maintaining a connection between the upstream catchment and the Wharemaukū Stream. The Wharemaukū Stream itself will remain on its existing alignment, maintaining connectivity with its upstream and downstream reaches.

1673. The Project also includes the construction of new culvert crossings associated with the proposed road network and Iver Trask extension. These works will involve localised disturbance of the Wharemaukū Stream and require measures to maintain fish passage and minimise effects on aquatic fauna.

1674. Section 6.3.2 of the assessment identifies that the proposed box culvert crossing of the Wharemaukū Stream should have a minimum width of approximately 3.9m to accommodate the existing channel, which is approximately 3m wide. Bioresearches advises that, provided the culvert is designed in accordance

with the fish passage requirements of Regulation 70 of the NES-F, fish passage through the crossing should remain unimpeded.

As outlined in Section 6.3.7.4 of the assessment, freshwater connectivity will also be maintained and enhanced through the realignment of Watercourse 1, the provision of culverts that do not impede fish passage and the proposed restoration of the Wharemaukū Stream. The establishment of the adjoining biodiversity wetland and riparian restoration areas will provide additional connected aquatic and terrestrial habitats, improving opportunities for indigenous freshwater fauna to move between habitats and contributing to the ecological function of the wider catchment.

Effects on Freshwater Fauna

1675. As set out in Section 6.3.3 of the assessment, the existing artificial drains, Watercourse 1 and natural inland wetlands provide varying levels of habitat for indigenous freshwater fauna. While habitat values within the artificial drains and modified wetlands are generally limited, these features may support shortfin eel and other freshwater fauna. The Wharemaukū Stream provides more substantial aquatic habitat, including habitat for indigenous fish and macroinvertebrates.

1676. The proposed piping, reclamation and modification of aquatic habitats have the potential to result in injury or mortality of indigenous freshwater fauna present within the works areas. Similar effects may arise during construction of the proposed stream crossings, particularly where works involve disturbance of the streambed, dewatering or temporary isolation of aquatic habitats.

1677. Although brown mudfish were not detected during targeted surveys and have not been recorded within the Wharemaukū Stream catchment, the *Ecological Management Plan* identifies that their presence within suitable wetland habitats is possible, albeit unlikely. The proposed freshwater fauna management measures therefore include specific provisions for brown mudfish should they be encountered during the works.

1678. Without the application of effects management measures, Bioresearches has assessed the magnitude and level of potential effects on indigenous freshwater fauna as High.

1679. To manage these effects, a site-specific *Fish Management Plan* has been prepared as Section 4 of the *Draft Ecological Management Plan*. The plan provides for the recovery and relocation of indigenous freshwater fauna prior to works affecting existing aquatic habitats, including Watercourse 1, the artificial drains, wetlands and localised works areas within the Wharemaukū Stream.

1680. The *Fish Management Plan* identifies appropriate relocation areas having regard to the habitat requirements of the species captured. Fish recovered from Watercourse 1 and the artificial drains will generally be relocated to suitable downstream habitat within the Wharemaukū Stream, while fish recovered from wetland habitats will be relocated to suitable wetland habitat immediately south of the Site. Where brown mudfish are encountered, an appropriate relocation location within the same catchment will be identified by the Project Ecologist in collaboration with mana whenua, having regard to the particular habitat requirements of that species.

1681. The *Fish Management Plan* also sets out the methods for fish capture and relocation, including electric fishing, trapping and netting, dewatering and excavation where appropriate, the use of exclusion screens to prevent fish re-entering works areas, and procedures for handling, transportation, biosecurity and animal welfare. Fish recovery and relocation will be undertaken by suitably qualified freshwater ecologists within one week prior to the commencement of works affecting aquatic habitats, subject to the construction methodology and prevailing conditions.

1682. The implementation of these measures will minimise the potential for injury or mortality of indigenous freshwater fauna during construction. Section 6.3.7.2 of the AEcE concludes that implementation of the fish recovery and relocation protocols will reduce the magnitude and overall level of effect on freshwater fauna to Low.

Sedimentation

1683. As set out in Section 6.3.4 of the assessment, the proposed bulk earthworks, vegetation clearance and works within or adjacent to freshwater habitats have the potential to generate sediment that could enter the Wharemaukū Stream and downstream receiving environments. Increased sediment loads can adversely affect aquatic habitat through reduced water clarity, deposition of fine sediment on the streambed, and impacts on the respiratory structures and habitat requirements of fish and macroinvertebrates.

1684. Given the extent of the proposed earthworks and the proximity of works to freshwater habitats, Bioresearches has assessed the potential magnitude of sedimentation effects, in the absence of appropriate management, as High. The principal risk relates to the mobilisation and discharge of fine sediment during construction, particularly during periods of heavy rainfall and works within or adjacent to watercourses.

1685. To minimise these effects, the Project will be undertaken in accordance with an Erosion and Sediment Control Plan (ESCP) and Streamworks Management Plan (SMP), as recommended in Section 6.3.7.3 of the assessment and required under the *Draft Consent Conditions*. These plans will provide for the management of sediment-laden water, appropriate controls during earthworks and streamworks, and measures to minimise sediment entering the downstream receiving environment.

1686. Bioresearches sets out that the potential for sedimentation effects will be greatest during the earthworks and streamworks phases and will reduce as disturbed areas are stabilised and the proposed landscaping and restoration planting becomes established. They conclude that, with the recommended controls in place, the magnitude of sedimentation effects will be reduced to Low, resulting in an overall Very Low to Low level of ecological effect.

Stormwater

1687. Section 6.3.5 of the *Assessment of Ecological Effects* considers the potential effects of stormwater discharges on freshwater habitats and water quality. The development will increase the extent of impervious surfaces within the Site, with stormwater generated from roads, buildings and other developed areas requiring appropriate collection, treatment and discharge.

1688. As outlined in the assessment, stormwater generated within the Site will be treated prior to discharge to the freshwater receiving environment. Treatment will primarily be provided through bioretention rain gardens, with proprietary treatment devices used where spatial constraints require alternative solutions. Detention and retention will also be provided through area-specific measures, including soakpits, tanks and rainwater reuse systems as further described in the *Stormwater Management Plan.*

1689. The proposed stormwater management system will incorporate connections to the wider drainage and flood management network, including the proposed swales and biodiversity wetland. The assessment identifies that discharges to the wetland are intended to be managed so that the stormwater infrastructure does not adversely affect the ecological function of the compensation wetland. Stormwater outlets will also incorporate appropriate scour protection to minimise localised erosion and disturbance of receiving habitats.

1690. These measures are intended to minimise the introduction of contaminants, including nutrients, heavy metals and suspended solids, into the freshwater receiving environment, while managing the potential effects of concentrated stormwater discharges on stream and wetland habitats.

1691. Having regard to the proposed treatment and discharge arrangements, Bioresearches considers that stormwater discharges are not expected to result in degradation of freshwater water quality or habitat quality, including through increased fine sediment deposition or proliferation of periphyton. The assessment assesses the overall magnitude of effects associated with stormwater discharges, including the proposed outlets, as Low.

EFFECTS ON WETLANDS

1692. As described in Section 6.3.1.2 of the *Assessment of Ecological Effects*, the proposed works will result in the permanent loss of nine natural inland wetlands within the Site, comprising approximately 5.33ha of wetland habitat. The existing wetlands have been modified through historic and ongoing agricultural activities and are predominantly vegetated with exotic pasture grasses, rushes and other wetland-tolerant species. Their ecological values have been assessed by Bioresearches as Low to Moderate, reflecting their modified condition, limited indigenous vegetation and relatively low habitat diversity.

1693. Notwithstanding their modified condition, the existing wetlands continue to provide ecological functions, including water storage and filtration, together with habitat for wetland vegetation and fauna. Bioresearches has assessed the complete loss of the existing 5.33ha of wetland habitat as having a Very High magnitude of effect. Section 6.3.7.1 of the assessment identifies that, following consideration of opportunities to avoid, minimise and remedy the effects, the residual level of effect on wetland habitats remains Moderate to High and requires further management through biodiversity offsetting or compensation.

1694. A separate *Wetland Residual Effects Analysis* has therefore been prepared by Bioresearches to assess the residual effects associated with the proposed wetland loss and identify an appropriate compensation response (refer Appendix 28). The report considers the ecological values and functions of the affected wetlands, the opportunities for wetland creation and restoration within the Site, and the anticipated ecological gains associated with the proposed compensation measures.

1695. The proposed approach comprises biodiversity compensation rather than like-for-like biodiversity offsetting. As explained in Section 4 of the analysis, a like-for-like offset would involve recreating the existing exotic-dominated pastoral wetland communities. Bioresearches considers that this would achieve a less favourable ecological outcome than establishing a consolidated indigenous wetland complex supporting a greater diversity of wetland habitats. The proposed approach is therefore described as a 'trade-up' in ecological values, with the residual effects on the existing wetlands addressed through the creation of higher-value indigenous wetland habitat.

1696. The proposed compensation package involves the creation and establishment of approximately 5.44ha of indigenous wetland habitat within the southern and western parts of the Site, adjoining the Wharemaukū Stream corridor. The proposed wetland will incorporate a mosaic of habitat types, including permanently saturated areas, seasonally inundated marshes and swamps, and intermittently wet transitional habitats. These areas will be planted with indigenous species appropriate to the relevant hydrological conditions, with the longer-term intention of establishing wetland communities representative of the wider ecological district, including kahikatea-pukatea forest, mānuka fen, reedland and wetland carr habitats.

1697. As outlined in Section 6.2 of the analysis, the proposed wetland will be hydrologically supported by flows from the realigned Watercourse 1 and the eastern part of the Site, including flows conveyed through a forebay and low-flow connection. The wetland will be designed to accommodate different inundation and saturation periods to support the establishment of the intended indigenous wetland communities. The proposed hydrological regime, including the ability of the proposed design to sustain the intended wetland habitats, is separately addressed in the *Hydrology Assessment* accompanying this application.

1698. The analysis also identifies that the proposed compensation wetland will have a more consolidated form than the existing fragmented wetlands, with a more favourable area-to-perimeter ratio that is expected to reduce the influence of edge effects, including weed invasion, drying winds and adjoining land-use pressures. The establishment of indigenous wetland vegetation and associated riparian planting is expected to improve habitat diversity, ecological connectivity and wetland function.

1699. The proposed compensation package has been assessed using the Biodiversity Compensation Model, as detailed in Section 7 of the analysis. The model compares the ecological losses associated with the removal of the existing wetlands against the anticipated gains arising from the proposed wetland creation and restoration. The assessment predicts that the proposed compensation measures will achieve no net loss of wetland extent and a net positive outcome for wetland biodiversity values, with the modelled ecological gains exceeding the calculated residual impacts.

1700. The proposed wetland creation and restoration measures will be implemented in accordance with the Freshwater Restoration Plan contained in Section 5 of the *Ecological Management Plan*, together with a final *Wetland Management Plan*. These plans provide for the establishment of appropriate wetland contours and hydrological zones, indigenous planting, pest plant and pest animal management, and ongoing maintenance and monitoring. The planting programme will be undertaken in stages, including the establishment of pioneer wetland vegetation and subsequent enrichment planting as the wetland communities develop.

1701. The GWRC consent conditions also set out that the *Wetland Management Plan* must include monitoring of vegetation establishment, wetland condition and pest pressures, together with provision for remedial works where necessary. The proposed consent conditions also include for ecological performance targets, ongoing monitoring and maintenance, and long-term protection and management of the compensation wetland.

1702. Importantly, the proposed restoration and enhancement of the Wharemaukū Stream is not relied upon as part of the wetland biodiversity compensation accounting. Rather, these works are additional to the wetland compensation measures, although the two areas will be physically and ecologically connected through the adjoining riparian and wetland restoration areas.

1703. Overall, Bioresearches concludes that the proposed compensation package will appropriately address the residual effects associated with the loss of the existing natural inland wetlands. The creation of approximately 5.44ha of indigenous wetland habitat will provide a small increase in wetland extent, while the anticipated improvements in vegetation diversity, habitat quality and ecological connectivity are predicted to result in a net positive outcome for wetland biodiversity values, subject to successful establishment and ongoing management of the compensation wetland as required through the *GWRC Draft Conditions*.

Effects on Wetlands on Adjacent Sites

1704. The *Hydrological Effects Assessment* provided in **Appendix 30** has assessed the potential hydrological effects on existing wetlands located on neighbouring properties to the south of the Site. While some groundwater level changes are predicted in the surrounding area, these are generally limited to portions of the neighbouring wetlands that are not dependent on direct interaction with the deeper regional groundwater table and are instead supported by surface water. Accordingly, WWLA predicts negligible hydrological effects on these wetlands, including from temporary groundwater drawdown associated with construction dewatering.

1705. The assessment has also considered the potential implications of climate change, including changes in rainfall, groundwater recharge and groundwater levels. Modelling undertaken using the SSP3-7.0 climate change scenario indicates that the proposed wetland will continue to maintain suitable hydrological conditions, with no significant change predicted in groundwater contributions to the wetland.

1706. Overall, the WWLA assessment outlines that the Project will not result in material adverse hydrological effects on neighbouring wetlands.

SUMMARY OF EFFECTS ON FRESHWATER HABITATS AND VALUES

1707. Table 12 of the *Assessment of Ecological Effects* summarises the magnitude and level of potential effects of the proposed works on freshwater habitats and values prior to the implementation of effects management measures. The assessment identifies effects associated with the loss and modification of freshwater habitats, potential injury and mortality of indigenous freshwater fauna, sedimentation and stormwater discharges. The relevant assessment is reproduced in below.

Table 12. Magnitude of effect and level of effect of the proposed works to freshwater habitats WITHOUT effects management measures

Habitat	Ecological value	Proposed Activity	Magnitude of effect
Wharemauku Stream	Moderate		Moderate
Watercourse 1	Low	Reclamation through piping	High
		Diversion	
Drain 1	Negligible	Reclamation and removal through earthworks and infilling	Very High
Drain 2	Negligible		
Drain 3	Negligible		
Drain 4	Negligible		
Wetland 1	Low		
Wetland 2	Moderate		
Wetland 3	Moderate		
Wetland 4	Moderate		
Wetland 5	Moderate		
Wetland 6	Low		
Wetland 7	Moderate		
Wetland 8	Low		
Wetland 9	Low		
Native fish	Moderate	Potential harm and/or mortality,	High
		Reductions in connectivity and fish passage	Moderate

1708. As outlined above, the principal adverse effects relate to the permanent loss of existing natural inland wetlands, the removal and modification of artificial aquatic habitats, and the potential effects of construction activities on freshwater fauna and the downstream receiving environment. Bioresearches has identified a range of measures to manage these effects, as detailed in Sections 6.3.7.1–6.3.7.5 of the *Assessment of Ecological Effects* and further developed in the *Ecological Management Plan* and *Wetland Residual Effects Analysis*. These measures are summarised below.

Proposed Effects Management for Freshwater Fauna

1709. Potential effects on indigenous freshwater fauna will be managed through implementation of the Fish Management Plan contained in Section 4 of the *Ecological Management Plan*. This provides for the recovery and relocation of indigenous freshwater fauna prior to works affecting existing aquatic habitats, including Watercourse 1, the artificial drains, natural inland wetlands and localised works areas within the Wharemaukū Stream.

1710. The *Fish Management Plan* identifies the methods to be used for fish recovery and relocation, including appropriate capture techniques, isolation of works areas, selection of suitable relocation sites, and procedures for handling, transportation and animal welfare. The plan also includes provisions for adaptive management should unexpected species or circumstances be encountered during the works.

Bioresearches considers that implementation of these measures will substantially reduce the potential for injury or mortality of indigenous freshwater fauna. Section 6.3.7.2 of the assessment concludes that the magnitude and overall level of effect on freshwater fauna will be reduced to Low following implementation of the recommended management measures.

Proposed Effects Management for Wetlands

1711. The residual effects associated with the permanent loss of approximately 5.33ha of existing natural inland wetlands will be addressed through the proposed biodiversity compensation package, involving the creation and establishment of approximately 5.44ha of indigenous wetland habitat within the Site.

1712. As detailed in the *Wetland Residual Effects Analysis*, the proposed compensation approach has been developed to achieve no net loss of wetland extent and a net positive outcome for wetland biodiversity

values. The proposed wetland will incorporate a range of hydrological and vegetation zones, with indigenous planting intended to establish a more diverse and ecologically functional wetland environment than the existing exotic-dominated pastoral wetlands.

The proposed compensation measures will be implemented through the *Freshwater Restoration Plan* contained in the *Ecological Management Plan*, a final Wetland Management Plan, and associated monitoring, maintenance, pest management and adaptive management requirements. Bioresearches considers that these measures will appropriately address the residual adverse effects associated with the proposed wetland loss, with the BCM assessment supporting the anticipated net positive outcome for wetland biodiversity values.

Wetland Hydrology

1713. The hydrological effects of the Project the proposed wetland complex have been assessed in the *Hydrological Effects Assessment Report*, attached in Appendix 30.

1714. The assessment draws on 351 days of continuous groundwater monitoring, together with historical groundwater information and a calibrated numerical groundwater model. The modelling considers existing and post-development groundwater conditions, including seasonal variations, changes to groundwater recharge and drainage, and the ability of the proposed wetland compensation area to maintain suitable hydrological conditions over the longer term.

1715. Of particular relevance, WWLA has assessed the relationship between the proposed wetland formation levels and the underlying groundwater table. Under existing conditions, groundwater within the proposed compensation area is generally encountered approximately 0.6–1.2m below ground level. The proposed earthworks will lower ground levels by approximately 0.5–1.5m across much of this area, bringing the finished wetland surface close to the existing groundwater table.

1716. The proposed wetland will be established over peat deposits, which support shallow and locally perched groundwater conditions. WWLA's modelling predicts that groundwater will remain sufficiently close to the finished wetland surface to maintain the intended wetland hydrology, including during seasonal periods of lower groundwater levels. The proposed swale network will also receive a limited contribution from groundwater baseflow, with the wetland hydrology further supported by drainage from surrounding areas and surface water inputs during rainfall events.

1717. On this basis, WWLA concludes that the proposed wetland compensation area is hydrologically viable over the long term and capable of sustaining the wet conditions necessary to support the proposed wetland habitat. These findings support the proposed wetland compensation approach assessed in the *Ecological Impact Assessment*, including the ability of the proposed wetland to establish and sustain the intended wetland habitat.

Proposed Effects Management for Sedimentation

1718. Potential sedimentation effects will be managed through implementation of an *Erosion and Sediment Control Plan* and *Streamworks Management Plan*, as recommended in Section 6.3.7.3 of the *Assessment of Ecological Effects*. These measures will be particularly important during earthworks and construction activities within or adjacent to Watercourse 1 and the Wharemaukū Stream.

1719. The proposed controls will provide for the management of sediment-laden water, stabilisation of disturbed areas, and regular inspection and maintenance of erosion and sediment control devices. Bioresearches specifically recommends that controls adjacent to freshwater habitats be checked before and immediately following heavy rainfall events to minimise the potential for sediment discharge to the downstream receiving environment.

1720. With these measures in place, Bioresearches concludes that the magnitude of sedimentation effects will be reduced to Low, resulting in an overall Very Low to Low level of ecological effect.

Proposed Effects Management for Freshwater Connectivity Through the Site

1721. Freshwater connectivity will be maintained through the retention of the Wharemaukū Stream on its existing alignment, the provision of culvert crossings designed to maintain fish passage, and the realignment of Watercourse 1 through the proposed open swale and biodiversity wetland.

1722. As outlined in Section 6.3.7.4 of the *Assessment of Ecological Effects*, these measures are intended to maintain existing freshwater connections through the Site, including the connection between the upstream catchment and the Wharemaukū Stream. The proposed wetland and riparian restoration areas will also provide additional connected aquatic and terrestrial habitats, improving opportunities for indigenous freshwater fauna to move between habitats and enhancing the ecological function of the wider freshwater network.

1723. Bioresearches considers that the proposed works will therefore maintain freshwater connectivity and, through the establishment of the interconnected wetland and stream restoration areas, provide opportunities for improved habitat connectivity and ecological function.

Proposed Stream Enhancements

1724. The Project includes restoration and enhancement of the Wharemaukū Stream along its existing alignment, as detailed in Section 6.3.7.5 of the *Assessment of Ecological Effects* and Section 5 of the *Ecological Management Plan*. The proposed works include indigenous riparian planting and targeted in-stream habitat improvements, such as the placement of boulders, root wads and woody material, and the creation of pools and riffles to increase habitat diversity and improve conditions for indigenous freshwater fauna.

1725. The proposed planting will improve shading, bank stability and riparian habitat, while recognising the ongoing flood management and maintenance requirements of the Stream. The specific in-stream enhancement measures will be determined by the Project Ecologist and contractor, with involvement from mana whenua.

1726. Bioresearches concludes that the proposed enhancements will improve the ecological function and habitat values of the Wharemaukū Stream, resulting in an overall Positive level of ecological effect. These improvements will also complement the adjoining biodiversity wetland and wider freshwater restoration works proposed as part of the Project.

SUMMARY OF ECOLOGICAL EFFECTS

1727. Table 14 of the *Assessment of Ecological Effects* summarises the effects of the Project on terrestrial and freshwater habitats and indigenous fauna, including the ecological values of the affected habitats and species, the magnitude and level of potential effects, and the residual effects following implementation of the proposed effects management measures.

1728. The assessment identifies that the existing terrestrial habitats, comprising predominantly exotic grassland and scrubland, have Negligible to Low ecological values. Accordingly, the effects associated with their removal are generally assessed as Very Low to Low. In contrast, indigenous lizards and avifauna have Moderate ecological values, with potential effects prior to management assessed as High for lizards and Moderate for avifauna. The proposed loss of natural inland wetlands also represents a significant adverse effect, while the removal and modification of artificial watercourses and drains generally have lower levels of effect, reflecting their comparatively limited ecological values.

1729. As outlined in the sections above, the Project incorporates a range of measures to manage these effects, including:

- Indigenous terrestrial, wetland and riparian planting, together with ongoing pest plant and pest animal management;
- Implementation of the Lizard Management Plan, including salvage and relocation of indigenous lizards prior to habitat clearance and associated habitat enhancement;

- Management of potential effects on avifauna through pre-clearance nesting bird surveys and measures to avoid or minimise disturbance to active nests;

- Recovery and relocation of indigenous freshwater fauna, together with erosion and sediment controls and measures to maintain freshwater connectivity and fish passage;

- Biodiversity compensation through the creation and restoration of approximately 5.44 ha of indigenous wetland habitat to address the residual effects associated with the loss of existing natural inland wetlands; and

- Restoration and enhancement of the Wharemaukū Stream and its riparian margins, including indigenous planting and targeted in-stream habitat improvements.

1730. Following implementation of the proposed effects management measures, Bioresearches assess the residual effects on indigenous lizards and avifauna as Low. The effects on native fish are assessed as Very Low in Table 14, while the proposed terrestrial planting and habitat enhancement measures are assessed as resulting in a net gain in terrestrial habitat values.

1731. The permanent loss of approximately 5.33 ha of natural inland wetlands remains the most significant residual ecological effect requiring biodiversity compensation. As detailed in the *Wetland Residual Effects Analysis Report*, the proposed compensation package is predicted to achieve no net loss of wetland extent and a net positive outcome for wetland biodiversity values, with the Biodiversity Compensation Model predicting a compensation score 28.5% higher than the impact score, exceeding the recommended 10% net positive target. The restoration and enhancement of the Wharemaukū Stream will provide additional ecological benefits, including improved riparian habitat, in-stream habitat diversity and freshwater connectivity.

1732. Overall, Bioresearches concludes that, following implementation of the proposed ecological management, restoration and biodiversity compensation measures, the Project will result in Low or Very Low residual effects on indigenous fauna, with net gains predicted for terrestrial and wetland biodiversity values and positive ecological outcomes associated with the freshwater restoration works. On this basis, the assessment concludes that no additional ecological effects management measures are necessary, subject to the successful implementation and monitoring of the proposed measures.

11.1.14 EFFECT ON NATURAL AND PHYSICAL RESOURCES THAT HAVE VALUES AS LISTED IN - SCHED 5 CL7(D)

EFFECTS ON AESTHETIC VALUES

1733. The potential effects of the Project on aesthetic values are primarily addressed in the *Landscape and Visual Impact Assessment* and *Urban Design Assessment* accompanying this application. These assessments consider the existing landscape character and visual qualities of the Site, the effects of the proposed development and associated earthworks on those values, and the contribution of the proposed landscaping, wetland restoration, stream enhancement and open spaces to the resulting landscape environment.

EFFECTS ON RECREATIONAL VALUES

1734. The potential effects of the Project on recreational values are addressed in the landscape, urban design and transport assessments accompanying this application.

1735. The majority of the Site is privately owned and does not currently provide for public recreational access, with the exception of the existing shared pedestrian and cycle path along the Wharemaukū Stream, which partially falls within the Site boundaries. While part of the Site is owned by KCDC, this land is not readily accessible to the public and is not currently used for recreational purposes. The existing shared path will be retained and enhanced as part of the Project, including through improvements to the adjoining stream corridor, landscaping and connections to the proposed internal pedestrian and cycle network.

1736. The Project will substantially increase opportunities for public recreation through the provision of an interconnected network of open spaces, pedestrian and cycle routes, and landscaped areas. These will connect with the existing Wharemaukū Stream shared path and surrounding movement network, improving public access and connectivity through an area that is currently largely inaccessible.

1737. In addition, the proposed biodiversity wetland, enhancement of the Wharemaukū Stream corridor and associated open spaces will provide an attractive setting for walking, cycling and informal recreation. The integration of these areas with the wider development will provide opportunities for the public to experience and enjoy the restored natural environment, while also improving the amenity and recreational values of the wider area.

1738. Overall, the Project will have positive effects on recreational values through the retention of the existing shared path, improved public access and the establishment of new recreational spaces and connections.

EFFECTS ON SCIENTIFIC VALUES

1739. The potential effects of the Project on natural and physical resources with scientific values are addressed through the ecological and archaeological assessments accompanying this application. These assessments consider the existing ecological values of the Site, including its freshwater and terrestrial habitats, together with the archaeological information values associated with the remnant dune landforms and potential subsurface archaeological material. T

EFFECTS ON HISTORIC VALUES

1740. An *Archaeological Assessment of Effects* has been prepared by Emily Howitt Archaeology to assess the archaeological values of the Project Area and the potential effects of the Project on those values. Refer **Appendix 34.** The assessment supports both the resource consent applications and the archaeological authority being sought concurrently as part of this substantive application. The archaeological authority is addressed separately in Part 2 of this application.

1741. The assessment sets out that the Project Area forms part of the wider Kapiti coastal dune landscape and contains remnant sand dune landforms and low-lying former wetland areas. Archaeological evidence from the wider Kapiti Coast demonstrates a strong association between archaeological sites and the more stable dune landforms, particularly those adjoining former wetlands. Accordingly, the dune areas within the Site have a relatively high potential to contain archaeological material, while the low-lying former wetland areas have a lower archaeological potential.

1742. One archaeological site, R26/829, is recorded within the Project Area. This comprises a scatter of shell midden on the northern slope of the dune ridge. Two additional locations containing sparse marine shell have also been identified and may indicate further subsurface archaeological deposits. Based on archaeological investigations elsewhere within the same Kapiti dune landscape, there is also a high probability of additional unrecorded archaeological material being encountered during earthworks, most likely comprising shell middens and associated features such as hearths.

1743. The archaeological assessment identifies that these sites are generally expected to have moderate to low archaeological values. While midden and oven sites are common on the Kapiti Coast, they have moderate contextual and information values and can contribute to understanding past settlement, resource use and the relationship between occupation and the surrounding dune and wetland environment.

1744. The proposed earthworks will affect the remnant dune landforms and therefore have the potential to modify or destroy both R26/829 and currently unrecorded archaeological material. Given the extent of earthworks required, the assessment concludes that avoidance of all archaeological sites is not practicable.

1745. To manage these effects, an Archaeological Management Plan (AMP) has been prepared and an archaeological authority is sought as part of this application. The AMP provides for targeted archaeological monitoring of earthworks within the dune areas, specific investigation and recording of R26/829, procedures for any previously unrecorded archaeological material encountered, and protocols relating to kōiwi tangata and taonga tūturu.

1746. The *Archaeological Assessment of Effects* concludes that, while archaeological material will potentially be affected by the proposed earthworks, effects on archaeological values are acceptable provided that archaeological sites encountered are appropriately investigated, recorded and analysed through the proposed archaeological monitoring programme.

1747. On this basis, and having regard to the archaeological authority and associated AMP being sought concurrently with the resource consents, effects on archaeological values are considered to be appropriately managed.

EFFECTS ON CULTURAL VALUES

1748. As noted, an *Interim Cultural Impact Assessment* has been prepared by Te Ātiawa ki Whakarongotai Charitable Trust and is provided in Appendix 33. The assessment identifies the cultural values associated with the Site, the potential effects of the Proposal on those values, and the outcomes Te Ātiawa would like to see achieved through the development.

1749. The assessment recognises the Site as part of a wider cultural landscape with longstanding whakapapa connections to Te Ātiawa. While acknowledging that the Site has been substantially modified through historic land use, drainage and development, Te Ātiawa considers that the remaining dunes, wetlands and waterways continue to hold important cultural and environmental values. The assessment considers these values through the themes of whakapapa, tino rangatiratanga, whenua and wai, recognising the interconnected relationships between these elements of the landscape.

1750. Concerns identified in the CIA relate to the following:

- Dunes: The existing dunes are identified as important features of the cultural landscape, with whakapapa, historical and ecological associations. Their proposed modification and removal is the Trust's principal concern, and the assessment seeks their retention and protection.

- Wharemaukū Stream: The Stream is identified as an important ancestral waterway. The Trust seeks greater consideration of opportunities to restore and naturalise the Stream, including a more natural alignment and improved connections with the proposed wetland areas.

- Wetlands: The assessment raises concerns regarding the reclamation of existing wetlands and their associated cultural and ecological values, including their importance for mahinga kai, rongoā and customary practices. Ātiawa seeks greater consideration of avoidance and enduring outcomes from the proposed wetland restoration and compensation.

- Whakapapa and kaitiakitanga: The assessment identifies concerns regarding the loss of natural features that contribute to the cultural identity of the area and seeks meaningful ongoing involvement in the design, implementation and management of the development, including ecological restoration, monitoring, cultural interpretation and management plans.

1751. The assessment acknowledges the potential community benefits of the Proposal but makes clear that the Trust does not support the development in its current form, primarily because of the proposed dune removal. The Applicant acknowledges this position and the concerns raised in the assessment, including that the cultural effects identified by the Ātiawa have not been fully resolved.

1752. Since receiving the assessment on 30 September 2026, the Applicant has continued discussions with the Ātiawa to better understand the matters raised and identify where further work or changes may be possible. This included a meeting on 16 October 2026 with representatives of Ātiawa and the Applicant, which focused particularly on the dunes and Wharemaukū Stream.

1753. In relation to the Wharemaukū Stream, the Applicant acknowledges the Trust's preference for greater naturalisation, including consideration of a more natural alignment. The current design provides for enhancement of the existing stream corridor, including riparian planting and improvements to its ecological condition, but does not propose the extent of realignment sought by Ātiawa. The Applicant remains open to further discussions with the Trust and the relevant technical specialists regarding opportunities to improve the proposed treatment of the Stream, including its relationship with the adjoining

wetland areas. These discussions will also need to consider the wider engineering, flood management and ecological requirements of the Project.

1754. The Applicant also recognises the concerns raised regarding the reclamation of existing wetlands. As outlined in this application, the practicability of retaining the existing wetlands has been considered through the design process, and the Proposal includes the establishment of a substantial indigenous wetland complex to address the residual ecological effects. While this does not remove the cultural concerns associated with the loss of the existing wetlands, the Draft Consent Conditions include opportunities to involve Ātiawa on the detailed design and implementation of the restoration works. This includes the proposed planting, habitat establishment, monitoring and ongoing management arrangements, and consideration of how cultural values and aspirations can be incorporated into these activities.

1755. In response to the assessment, the Applicant has reviewed the proposed GWRC consent conditions, with an updated set provided to the Trust on 20 October 2026. These include additional provisions intended to provide for greater mana whenua involvement in ecological management, wetland restoration, monitoring and detailed design. The intention is to continue working through these conditions with the Ātiawa to establish an appropriate and workable framework for its involvement as the Project progresses if it is consented.

1756. The proposed modification and removal of the dunes remains the most significant outstanding matter. The Applicant understands the importance the Ātiawa places on these landforms and its position that they should be retained. As outlined in the Engineering Wetland and Dune Avoidance Memorandum prepared by Envelope Engineering and Urban Acumen, the practicability of retaining the dunes has been considered in the context of the wider development, including the earthworks, infrastructure, flood management and urban design requirements. These considerations have informed the current design and the Applicant's position on the practicability of retaining the dunes. However, it is acknowledged that these technical and design considerations do not resolve the cultural concerns identified in the CIA.

1757. Following the meeting on 16 October 2026, the Applicant received a memorandum dated 20 October 2026 from Greg Carlyon of The Catalyst Group (planning consultant on behalf of Ātiawa), which records the discussion and identifies a potential way forward. The memorandum acknowledges the Ātiawa's continuing position regarding dune retention and greater naturalisation of the Wharemaukū Stream, while recognising the technical and design considerations that have informed the current Proposal. It identifies opportunities for further discussions between Ātiawa, the Applicant's technical advisers and the relevant councils, including consideration of further stream naturalisation, measures to address residual cultural effects associated with dune modification and removal, and potential cultural compensation.

1758. Importantly, the memorandum also acknowledges the Applicant's intention to proceed with lodgement of the substantive application on the basis of the current Proposal, with these discussions continuing alongside the fast-track process. The Applicant considers this to be a constructive way forward, allowing the outstanding matters to be explored, with any relevant outcomes of those discussions to be provided to the Panel as the substantive application progresses.

Overall Assessment

1759. The Interim *Cultural Impact Assessment* identifies potential adverse effects on cultural values from the Proposal, particularly in relation to the modification and removal of the existing dunes, reclamation of wetlands and proposed treatment of the Wharemaukū Stream.

1760. While the Applicant considers that the design has appropriately responded to the Site's environmental constraints and the wider objectives of the Project, it is recognised that the measures proposed do not fully address the concerns raised in the CIA, particularly in relation to the dunes.

1761. There are, however, opportunities to continue working through a number of these matters, including the detailed design and management of the proposed wetland complex, further enhancement and potential naturalisation of the Wharemaukū Stream, and provisions for ongoing mana whenua involvement in ecological restoration and monitoring.

1762. Discussions regarding the dunes are also continuing, including consideration of potential measures to address residual cultural effects, as outlined in the 20 October 2026 memorandum from The Catalyst Group.

1763. While agreement has not yet been reached on all matters, recent engagement has been constructive, and there is a commitment on both sides to continue working through the outstanding issues and find a pathway forward. The Applicant remains committed to these discussions as the substantive application progresses, with the aim of achieving outcomes that better respond to the concerns raised by Ātiawa.

11.1.15 DISCHARGE OF CONTAMINANTS INTO THE ENVIRONMENT – SCHED 5 CL7(E)

STORMWATER MANAGEMENT

1764. The potential stormwater effects associated with the Project have been assessed by Envelope Engineering in the *Stormwater Management Plan*, included as **Appendix 14**. The report considers the changes to stormwater runoff arising from the proposed development, including effects on peak flows, groundwater recharge and the receiving environment of the Wharemaukū Stream. The assessment is supported by the *Flood Risk Assessment* (**Appendix 15**) and the *Hydrological Effects Assessment* (**Appendix 30**).

1765. As outlined in the proposal section in Section 7 above, the Project will result in substantial changes to the existing landform, drainage characteristics and extent of impervious surfaces across the Site. Section 15.3 of the plan identifies that the existing impervious area of approximately 3,500m² will increase to approximately 179,000m² following development. Without appropriate stormwater management measures, these changes have the potential to increase stormwater runoff and peak flows, with associated effects on downstream drainage systems and the Wharemaukū Stream.

1766. Section 11 of the plan assesses the potential changes in runoff using HEC-HMS modelling of pre-development and post-development conditions. Envelope Engineering identifies that, without mitigation, the proposed development would result in increases in peak stormwater flows of approximately 20%. To address this, the Project incorporates stormwater attenuation measures, principally comprising soakage devices within selected development catchments.

1767. The proposed attenuation measures have been incorporated into the hydrological modelling to determine whether peak flows can be maintained at or below pre-development levels. Section 11.2 of the SMP confirms that "*The HEC-HMS model results show that hydraulic neutrality of peak flows can be achieved with stormwater control measures*"

1768. The SMP identifies that the proposed measures are sufficient to attenuate peak flows across the 2-, 5-, 10- and 100-year rainfall events for the fully developed site, subject to the modelling assumptions and allowances identified in the report. The proposed approach provides for soakage within selected catchments to offset runoff from other areas where individual attenuation devices are not proposed.

1769. The feasibility of soakage has been considered having regard to the proposed ground improvement works and anticipated groundwater conditions. The replacement of existing low-permeability peat and organic materials with more permeable sand is expected to improve infiltration characteristics across parts of the Site. However, the plan also recognises that soakage may be less suitable in areas with higher groundwater levels, particularly the commercial catchments adjoining Kapiti Road.

1770. The final sizing and configuration of soakage devices will be confirmed through detailed design, following site-specific testing after ground improvement works. Where soakage is not reasonably practicable, alternative attenuation measures will be adopted, provided that they achieve the hydraulic neutrality outcomes required by the Draft Consent Conditions. This is considered to be an appropriate approach for a development of this nature and scale. The Stormwater Management Plan establishes a technically assessed attenuation strategy and demonstrates that hydraulic neutrality can be achieved, while allowing the final engineering design to respond to verified ground conditions. The proposed consent conditions provide an appropriate mechanism for ensuring that the required performance standards are achieved.

1771. In addition to peak stormwater flows, the proposed changes in landform and impervious surfaces have the potential to alter the existing water balance, including infiltration, groundwater recharge and the

contribution of groundwater to baseflows within the Wharemaukū Stream. These matters are particularly relevant given the relationship between the existing shallow groundwater system, the Wharemaukū Stream and the proposed wetland compensation complex.

1772. The plan recognises that achieving hydraulic neutrality in peak flows alone does not necessarily address the wider hydrological implications of development. Accordingly, the proposed stormwater management strategy incorporates passive soakage measures intended to maintain groundwater recharge and support stream baseflows.

1773. As outlined in Section 15.11 of the plan, the WWLA hydrological modelling has incorporated retention of the first 20mm of rainfall from road areas through passive soakage associated with the proposed rain gardens. This allows rainfall that would otherwise be conveyed directly into the stormwater network to infiltrate into the underlying ground. Envelope Engineering notes that *"The WWLA analysis shows that the passive raingardens allow the development to closely match base flow conditions".*

1774. The plan also identifies that earlier hydrological modelling, undertaken before the passive recharge measures were incorporated, indicated differences between pre-development and post-development stream baseflows. This demonstrates the importance of the proposed passive soakage measures in managing the hydrological effects of the development.

1775. The proposed stormwater system therefore addresses both peak stormwater discharge rates and the need to maintain groundwater recharge and stream baseflow conditions. The final design of the rain gardens and passive soakage arrangements will be subject to verification of infiltration performance and consideration of groundwater levels to ensure that the hydrological outcomes assumed in the WWLA assessment can be achieved.

1776. The proposed stormwater management strategy also incorporates approximately 26,000 m^3 of additional flood storage capacity, integrated with the proposed wetland compensation complex adjoining the Wharemaukū Stream. As outlined in Section 10 of the Stormwater Management Plan, the supporting Flood Risk Assessment demonstrates that the proposed earthworks and flood storage arrangements can accommodate the changes associated with development without exacerbating flood risk on surrounding properties. The modelling also predicts reductions in flood levels in areas to the south of the Site.

1777. Overall, having regard to the findings of the *Stormwater Management Plan* and supporting technical assessments, the proposed stormwater management measures are considered to provide an appropriate means of managing the changes in runoff arising from the Project. Subject to implementation of the proposed attenuation and passive soakage measures, verification through detailed design and compliance with the proposed consent conditions, adverse effects associated with increased peak stormwater flows, groundwater recharge and Wharemaukū Stream baseflows can be appropriately managed.

WATER QUALITY EFFECTS

During Construction

1778. The proposed earthworks and construction activities have the potential to affect water quality within the Wharemaukū Stream and downstream receiving environments, particularly through sediment-laden runoff from exposed soils, stockpiles, construction accessways and works undertaken near watercourses. Other potential contaminants include fuels, oils, concrete washwater and other construction-related substances.

1779. As detailed in the draft ECMP, a range of erosion and sediment control measures will be implemented throughout construction. These include staged earthworks, clean-water diversions, sediment retention ponds, decanting earth bunds, silt fences, stabilised construction entrances and progressive stabilisation of disturbed areas. Additional controls will be implemented where works are undertaken near the Wharemaukū Stream and other sensitive receiving environments.

1780. The erosion and sediment control measures will be designed and implemented in accordance with the relevant GWRC guidance, with detailed plans prepared for each stage of earthworks. Regular inspections,

maintenance and monitoring will be undertaken, including following significant rainfall events, to ensure that the controls remain effective throughout construction.

1781. Importantly, the Proposal also includes a programme of water quality monitoring within the Wharemaukū Stream during construction. As outlined in the ECMP, this will include baseline monitoring prior to earthworks, together with ongoing monitoring at representative upstream and downstream locations. The purpose is to identify any deterioration in water quality attributable to construction activities, while accounting for existing conditions and natural variations associated with rainfall and stream flows.

1782. The monitoring programme will include:

Baseline water quality measurements, particularly turbidity and other relevant indicators of sediment discharge;

- Regular upstream and downstream monitoring during earthworks, with increased monitoring during higher-risk activities near the Stream;
- Additional monitoring following significant rainfall events or suspected sediment discharges;
- Monitoring of other relevant parameters, including pH where there is a risk of alkaline discharges;
- Investigation and corrective action where monitoring identifies potential construction-related deterioration in water quality; and
- Recording and reporting of monitoring results, incidents and corrective actions.

1783. The detailed monitoring locations, frequency, parameters and response triggers will be confirmed through the ECMP and relevant consent conditions. The use of upstream and downstream monitoring will assist in distinguishing construction-related effects from natural variations in stream water quality, while providing an opportunity to identify and respond to any issues as works progress. Monitoring will continue as necessary until the relevant earthworks areas have been stabilised and the risk of sediment discharge has been appropriately managed.

1784. Accordingly, while temporary sediment-related effects may occur during construction, the combination of erosion and sediment controls, staged earthworks and ongoing stream monitoring is expected to appropriately manage and minimise adverse construction-related water quality effects.

Operational Water Quality Effects

1785. The Proposal will result in a change in land use from predominantly pastoral land to a mixed-use urban development, incorporating residential, commercial and retail activities, roads, parking areas and associated infrastructure. This will change the nature of stormwater runoff generated within the Site, including the types and concentrations of contaminants potentially entering downstream receiving environments.

1786. Stormwater from urban environments can contain suspended sediments, heavy metals (particularly copper and zinc), hydrocarbons and nutrients associated with vehicle movements, road surfaces, building materials and other urban activities. However, the existing pastoral use of the Site also generates potential sediment and nutrient inputs associated with grazing and surface runoff. Accordingly, the change in land use will alter the nature of contaminant sources rather than necessarily increasing all contaminant types.

1787. The *Stormwater Management Plan* sets out the proposed approach to managing operational stormwater runoff, including the use of bioretention rain gardens to provide water quality treatment prior to discharge. These systems treat runoff through sedimentation, filtration, adsorption and biological processes, assisting in the removal of suspended sediments, metals and nutrients.

1788. Based on the Wellington Water stormwater design guidance and the treatment efficiencies identified in the SMP, bioretention rain gardens designed and constructed in accordance with the relevant guidelines are expected to achieve the following indicative contaminant removal efficiencies:

- Total zinc – 90%
- Total copper – 90%
- Total suspended solids – 90%
- Total nitrogen – 40%
- Total phosphorus – 60%

1789. These values represent indicative treatment performance rather than guaranteed removal rates. The effectiveness of the proposed devices will depend on their detailed design, contributing catchments, hydraulic loading, filter media and ongoing maintenance. These matters will be addressed through the detailed design and approval processes required by the proposed consent conditions.

1790. The development will also establish an indigenous wetland complex, a vegetated central swale and enhanced riparian margins along the Wharemaukū Stream. These areas will provide wider ecological and water quality benefits through indigenous planting, soil stabilisation and the establishment of vegetated freshwater environments.

1791. Importantly, the proposed wetland complex is primarily intended to provide ecological compensation for the loss of existing wetlands and will have a secondary function of flood storage. It is not relied upon as the primary treatment mechanism for urban stormwater runoff from the development, with contaminant treatment instead provided through the proposed stormwater management infrastructure. This will assist in protecting the ecological functions of the wetland.

1792. Overall, the proposed bioretention treatment system, together with the removal of existing pastoral contaminant sources, establishment of vegetated freshwater environments and ongoing maintenance of stormwater infrastructure, provides an appropriate approach to managing operational water quality effects. Subject to detailed design, implementation and maintenance, adverse effects on the Wharemaukū Stream and downstream receiving environments are expected to be appropriately managed and minimised.

11.1.16 EMISSION OF NOISE – SCHED 5 CL7(F)

1793. The land use and activities proposed as part of the Project are generally anticipated within the MCZ, including the proposed commercial, large format retail and residential activities. The District Plan therefore anticipates the potential for noise to arise from these activities and contains specific standards to manage both noise generated by activities within the Zone and the relationship between noise-generating and noise-sensitive activities.

1794. In particular, permitted activity noise limits applying to non-residential activities and fixed plant are established through Rule NOISE-R4, construction noise is managed through Rule NOISE-R10 and Rule NOISE-R14 establishes acoustic insulation and ventilation requirements for residential activities, including more stringent requirements for residential activities in proximity to the State Highway. These provisions establish the acoustic outcomes expected for development of the type proposed within the MCZ. This is confirmed by Marshall Day Acoustics, who has reviewed the appropriate pathway for addressing noise associated with the Project as set out in the *Acoustic Letter* attached as Appendix 12.

1795. The relevant potential noise effects associated with the Project comprise construction noise, operational noise associated with the proposed commercial and large format retail activities, and the exposure of future residential activities to noise, including noise from the Kapiti Expressway. Marshall Day has identified these same three matters as those requiring consideration.

1796. Marshall Day has not recommended that a detailed acoustic assessment of these matters be undertaken as part of the substantive application. Rather, its advice is that the applicable acoustic outcomes are already clearly established by the District Plan and that the detailed acoustic assessment and design required to demonstrate compliance is most appropriately undertaken once detailed building designs, plant specifications and construction methodologies are available. As Marshall Day explains:

"All three of these matters are normally addressed by well established engineering methods, and must be assessed by review of detailed design of buildings, and by review of construction methodologies. The appropriate time to carry out these acoustic designs is at the detailed design stage of the project."

1797. Importantly, Marshall Day also concludes that:

"There is no outstanding uncertainty around the level of noise protection that is appropriate for and from this development, as these matters are all well-defined in the operative District Plan."

1798. Accordingly, Marshall Day considers that:

"there is no benefit in providing an acoustic report to consider these matters at the stage of obtaining consent for the project"

1799. Consistent with this advice, the *KCDC Draft Conditions* include noise conditions that set out requirements to ensure compliance with the relevant District Plan noise standards.

1800. In relation to construction noise, the proposed conditions require the following:

- Construction work and heavy vehicle movements to generally occur between 7:30am and 6:00pm Monday to Saturday, with no noisy work on Sundays or public holidays.
- The access road between Kapiti Road and the main Site must also be maintained in a smooth condition and free from potholes or defects that could generate unnecessary truck noise.
- Construction noise is required to comply with specified limits when measured and assessed at occupied buildings on other sites in accordance with NZS 6803:1999.
- The preparation and lodgement of a Construction Noise Management Plan (CNMP) prior to construction commencing. The purpose of the CNMP is expressly to identify the best practicable option to minimise noise effects and ensure compliance with the applicable Project noise requirements. Among other matters, it must address activity-specific working hours, acoustic barriers, minimum separation distances, communication with neighbouring occupiers, measures to ensure contractors are aware of their obligations to minimise noise, and procedures for responding to concerns and complaints. Construction must thereafter be undertaken in accordance with the certified CNMP.

1801. In relation to operational noise, commercial and large format retail activities, including associated fixed plant, the proposed conditions instead require the final commercial activities and plant to be designed and assessed against the applicable noise limits once that information is available. In addition to the proposed conditions, the draft landscape plans for the LFR sites include 2m high close boarded acoustic fencing set behind a planted bund along the Kapiti Road frontage.

1802. With respect to acoustic treatment of future residential activities, the *KCDC Draft Conditions* require any new or altered habitable room within a dwelling to comply with the acoustic treatment and mechanical ventilation requirements of Rule NOISE-R14. Compliance must be demonstrated through the pathways contemplated by that rule, including either confirmation by a Licensed Building Practitioner that the specified construction and ventilation requirements are met, or an acoustic design certificate prepared by a suitably qualified acoustic engineer confirming that the required acoustic performance will be achieved. The necessary documentation must be provided to KCDC prior to the issue of building consent for the relevant dwelling. This ensures that the assessment is undertaken against the actual building design, including its façade, glazing and ventilation arrangements.

1803. Proposed conditions also seek to apply to noise-sensitive activities in proximity to the Kapiti Expressway. Any new or altered habitable room within a building housing a noise-sensitive activity within 80m of the edge of the closest Expressway carriageway must be designed and constructed to comply with the applicable acoustic treatment and mechanical ventilation requirements of Rule NOISE-R14. Compliance

must again be demonstrated through the specified certification pathway prior to the issue of building consent.

1804. The proposed conditions therefore establish both the acoustic standards that must be achieved and the mechanisms for demonstrating compliance when the detailed information necessary to undertake those assessments is available.

1805. Overall, the proposed activities are anticipated within the MCZ and the District Plan establishes specific standards to manage the associated noise effects. Having regard to those standards, Marshall Day's advice and the proposed conditions, potential construction and operational noise effects, together with effects associated with the exposure of future noise-sensitive activities to the receiving acoustic environment, can be appropriately managed and mitigated.

11.1.17 NATURAL HAZARDS OR HAZARD INSTALLATIONS – SCHED 5 CL7(G)

GEOTECHNICAL HAZARD EFFECTS

1806. The potential geotechnical hazard effects of the Proposal have been assessed by Torlesse Ltd in the *Geotechnical Assessment Report* (refer **Appendix 21**). The assessment draws on previous geotechnical investigations undertaken across the Site, together with supplementary investigations completed in 2026, and considers the suitability of the Site for the proposed subdivision, earthworks and development.

1807. As outlined in Section 6.2 and Table 13 of the report, Torlesse identifies low to moderate geotechnical risks associated with the existing ground conditions, including weak and variable soils, shallow groundwater, liquefaction, lateral spreading and slope instability. The report assesses the potential consequences of these hazards and identifies the engineering measures required to manage them.

1808. The following findings are noted:

- **Liquefaction and lateral spreading:** Torlesse has undertaken detailed liquefaction analyses using cone penetration testing data from across the Site. Under Serviceability Limit State (SLS) earthquake conditions, liquefaction effects are expected to be minimal, with estimated surface settlement of less than 10mm. Under Ultimate Limit State (ULS) conditions, liquefaction is predicted within discrete soil layers rather than throughout the soil profile, with estimated free-field settlement of approximately 15–45mm. The risk of lateral spreading is assessed as low. Torlesse considers that these risks can be appropriately managed through the removal of unsuitable soils, placement of engineered fill and specifically designed foundations where required (refer Section 6.3).

- **Slope stability:** Torlesse has assessed the stability of the proposed stormwater swale, temporary excavations adjoining the Kapiti Expressway, the proposed Lookout landform and the road causeway crossing the wetland area. The analyses indicate that the relevant target factors of safety can be achieved. While some localised movement may occur during a significant ULS earthquake, Torlesse considers that any resulting damage would generally be capable of repair. Appropriate batter design, surface protection and other engineering measures will be incorporated into the detailed design (refer Section 6.4).

- **Settlement:** The Site contains fibrous peat and organic sands, which have the potential to result in settlement if left untreated. The proposed earthworks will involve removing unsuitable peat and organic soils beneath building platforms and roads and replacing these materials with engineered fill. Torlesse anticipates that primary consolidation settlement will be negligible following this treatment, with long-term creep settlement estimated at approximately 3–5 mm over the 50-year design life. Trial compaction pads and settlement monitoring platforms are recommended to confirm the performance of the proposed fill materials (Sections 6.5 and 7.5).

- **Groundwater and effects on adjoining properties:** Shallow perched groundwater is present across parts of the Site, with higher groundwater levels identified near the Expressway. Torlesse has considered the potential effects of temporary groundwater lowering during construction, drawing on groundwater modelling undertaken by WWLA. The modelling identifies potential groundwater

lowering of up to 2.2 m near the Site boundaries, reducing with distance from the Site. Having regard to the characteristics of the underlying soils, Torlesse concludes that the risk of settlement affecting neighbouring buildings and infrastructure, including the Expressway, Kapiti Road and Kapiti Aquatic Centre, is expected to be negligible (Section 6.5.2).

- **Ground improvement and foundation design:** Section 7 of the report identifies the engineering measures required to support the proposed development, including removal of unsuitable soils, construction of engineered building platforms, appropriate foundation design, subsoil drainage and geotechnical testing and monitoring during construction. Torlesse considers that suitable foundation solutions are available for the proposed residential and commercial buildings, with building-specific design to be undertaken as the development progresses.

1809. Torlesse has also assessed the relevant geotechnical hazards against the National Policy Statement for Natural Hazards 2025 (NPS-NH). As set out in Section 6.6 and Table 17 of the report, the residual risks associated with landslips, active faults and liquefaction (including lateral spreading) are assessed as low, taking account of the recommended engineering measures. Torlesse concludes that these risks are not significant under the NPS-NH risk framework.

1810. In its overall conclusions (Section 8), Torlesse states:

> *"In our opinion, subject to the recommendations in this report being implemented, the geotechnical hazards identified present a low risk to the land, proposed structures and infrastructure, and are unlikely to be accelerated or worsened by the proposed works."*

1811. Relying on Torlesse's assessment, it is considered that the identified geotechnical hazards can be appropriately managed through the proposed earthworks, ground improvement, detailed engineering design and construction monitoring. The recommended measures will be incorporated into the detailed design and secured through the proposed consent conditions.

1812. Accordingly, the residual geotechnical hazard effects of the Proposal are assessed as low, and the development is not expected to materially increase geotechnical risks to adjoining land or infrastructure.

FLOOD HAZARD EFFECTS

1813. As outlined in Section 7 above, the Site is subject to existing flood hazards associated with the Wharemaukū Stream and wider catchment drainage network. The Proposal involves earthworks and changes to the existing landform, including filling within identified flood storage areas. These works have the potential to affect flood storage, flood conveyance and flood levels both within the Site and on surrounding land.

1814. The *Flood Risk Assessment* provided in **Appendix 15** assesses these effects using the updated KCDC Wharemaukū catchment hydraulic model, refined with site-specific survey and drainage information. The assessment compares existing and proposed development scenarios for the 10-year and 100-year ARI events, including climate change allowances.

The following matters are noted from the assessment:

- **Flood storage:** The proposed earthworks will change the distribution of flood storage across the Site, with existing low-lying areas raised to accommodate development and additional storage provided within the proposed wetland and flood management areas. The modelling demonstrates that there will be no net loss of flood storage, with approximately 26,000 m³ of additional flood storage provided during the 100-year ARI event compared with pre-development conditions. The increased flood depths within the proposed wetland complex are anticipated, given its proposed secondary function of flood storage.

- **Flood levels and depths:** The modelling identifies that flood depths generally remain unchanged or reduce in areas surrounding the Site, including reductions around Rimu Road and Ihakara Street. Some localised increases of approximately 7-21mm are identified at downstream checkpoints during the 100-year ARI event however Envelope note that these are within the adopted model

tolerance of 25mm and are not considered to represent discernible or material changes in flood conditions. The assessment also identifies some localised changes within the Coastlands Aquatic Centre pond.

- **Flood extent:** The proposed earthworks and drainage infrastructure will redirect floodwaters towards the proposed swales and wetland complex. As a result, the proposed residential and commercial development areas will be located outside the flood extents. The modelling does not identify any discernible increases in flood extent beyond the Site, with reductions identified in some surrounding areas, particularly around the Rimu Road and Ihakara Street intersection.

- **Flood flows:** The modelling identifies reductions in peak flows along parts of the Wharemaukū Stream adjoining the Site. At cross-section CS-03, peak flows reduce from 37.3 m³/s to 28.6 m³/s during the 10-year ARI event and from 52.4 m³/s to 29.4 m³/s during the 100-year ARI event. These reductions reflect the additional flood storage provided within the wetland complex.

- **Flood velocities:** Flood velocities generally reduce along parts of the Wharemaukū Stream adjoining the Site. Within the proposed wetland, velocities are generally between 0.1m/s and 0.6m/s, with higher velocities concentrated within the defined drainage channels and swales. Some localised increases are identified in association with the reconfigured drainage network and wetland connections.

- **Flood hazard:** The proposed residential and commercial areas and most of the internal road network are expected to achieve an H1 flood hazard classification, with isolated areas of H2 hazard at localised low points during the 100-year ARI event. Higher hazard classifications will be concentrated within the proposed wetland and flood management areas, where deeper flooding is expected. The FRA identifies no material changes in flood hazard classification outside the Site.

1815. The *Flood Risk Assessment* also considers flood risk having regard to the NPS-NH. The assessment incorporates climate change projections to 2130 and considers the likelihood and consequences of flooding, including residual risks associated with the exceedance of design thresholds. Envelope concludes that, with the proposed mitigation in place, the residential and commercial development areas will be subject to a low level of natural hazard risk.

1816. In addition, sensitivity testing has been undertaken to consider the performance of the proposed flood management system under changes in rainfall, pipe blockage, sedimentation and channel roughness. These matters inform the proposed design requirements and recommended building freeboard. The assessment recommends that building levels generally be established at least 500 mm above the adjacent modelled 100-year ARI flood level, with building levels able to be determined in accordance with Building Code requirements where adjacent flooding is less than 100 mm deep and a suitable overland flow path is provided.

1817. Envelope recommends that further flood modelling be undertaken at the Engineering Approval stage to reconfirm the final design. This will incorporate the detailed ground levels, roads, culverts, stormwater infrastructure and flood storage arrangements, together with revalidating the assumptions for the proposed wetland vegetation and hydraulic roughness. The updated modelling will also confirm the localised flood effects identified in Coastlands Aquatic Centre pond and demonstrate that the flood management mitigations relied upon in the assessment are maintained.

1818. Overall, the assessment concludes that the proposed development will increase flood storage capacity within the Site and generally maintain or reduce flood levels and depths in surrounding areas. While the distribution of flooding within the Site will change, the proposed flood management measures will accommodate these changes within the wetland and swale.

1819. Having regard to the findings of the FRA, I consider that the Proposal can appropriately manage the existing flood hazards and avoid material increases in flood risk to surrounding properties and infrastructure. The proposed *KCDC Consent Conditions* include requirements for updated flood modelling at the Engineering Approval stage to confirm the performance of the final design, including flood storage, conveyance and effects on surrounding land. Subject to these requirements, the adverse flood hazard effects of the Proposal are assessed as less than minor.

11.1.18 CLIMATE CHANGE MITIGATION AND ADAPTATION

1820. Section 22(2)(a) of the FTAA identifies a range of potential benefits of a project, including supporting climate change mitigation through reducing or removing greenhouse gas emissions (section 22(2)(a)(vii)), and supporting climate change adaptation and reducing risks arising from natural hazards (section 22(2)(a)(viii)). While these provisions relate to the referral criteria under the Act, they provide relevant context for considering how the Proposal responds to climate change and contributes to climate change mitigation and adaptation outcomes.

1821. The Proposal has considered the effects of climate change through the assessment of flood hazards, stormwater management and hydrological conditions, together with the location and form of the proposed development. The following matters are noted.

CLIMATE CHANGE ADAPTATION

1822. The *Flood Risk Assessment* has expressly considered the effects of climate change on flood risk within and surrounding the Site. The assessment uses the updated KCDC Wharemaukū catchment hydraulic model and incorporates climate change projections to 2130, including future rainfall and coastal boundary conditions. The modelling therefore considers the performance of the proposed development and associated flood management measures under future climatic conditions.

1823. The assessment demonstrates that the proposed earthworks, wetland complex, swales and associated flood management infrastructure can accommodate the changes in flood flows associated with the development, including under the modelled future climate conditions. Approximately 26,000 m³ of additional flood storage is provided during the 100-year ARI event, with flood levels and depths generally maintained or reduced on surrounding land. The proposed residential and commercial development areas will be established outside the modelled flood extents, with appropriate building levels and freeboard incorporated into the design.

1824. The *Flood Risk Assessment* also includes sensitivity testing to consider the performance of the proposed flood management system under increased rainfall, pipe blockage, sedimentation and changes in channel roughness. These assessments inform the recommended design requirements, including building freeboard and the need to maintain the proposed flood storage and conveyance functions. Further modelling at the Engineering Approval stage will confirm the performance of the final design, including the proposed wetland vegetation and associated hydraulic roughness assumptions.

1825. The *Hydrological Effects Assessment* has also considered the potential effects of climate change on groundwater recharge, groundwater levels and stream baseflows. The assessment tested an SSP3-7.0 climate change scenario, which predicted a small increase in overall groundwater recharge, although not of sufficient magnitude to materially alter the flow regime. WWLA concludes that there is no indication that the proposed development would exacerbate the effects of climate change on stream baseflows or result in groundwater inundation or dewatering of the proposed wetland compensation area.

1826. The proposed stormwater management system also incorporates measures to maintain hydraulic neutrality and support groundwater recharge, including attenuation devices and passive soakage associated with the proposed rain gardens. These measures are intended to manage changes in runoff associated with urban development while maintaining groundwater recharge and supporting baseflows within the Wharemaukū Stream. Together with the proposed flood storage and wetland areas, they provide an integrated approach to managing stormwater and freshwater environments under future climatic conditions.

11.1.19 CLIMATE CHANGE MITIGATION

1827. The location and form of the proposed development are also relevant to climate change mitigation. The Site is zoned Metropolitan Centre and is identified for comprehensive urban development under the MCZ Structure Plan. The Proposal will accommodate a substantial number of residential dwellings alongside retail, commercial and other activities within an established urban centre, supporting a more compact urban form and efficient use of land and infrastructure.

1828. The proposed mix of residential densities and typologies, including apartments and townhouses, together with commercial activities and access to existing services and facilities, provides opportunities to reduce the need for longer-distance travel. The development will also establish an integrated network of pedestrian and cycling connections, including connections to the surrounding urban area, while the Link Road will accommodate public transport. These features will provide residents, workers and visitors with alternatives to private vehicle travel and support greater accessibility between housing, employment, shopping and community facilities.

1829. The location of the development within the Metropolitan Centre Zone is particularly relevant in this regard. Accommodating additional housing and commercial activities within an existing urban centre, rather than in more dispersed locations, provides opportunities to reduce reliance on private vehicles and associated transport emissions. This is consistent with the direction of the NPS-UD, including Objective 8 and Policy 1, which seek urban environments that support reductions in greenhouse gas emissions and are resilient to the effects of climate change. While the Project will generate additional vehicle movements, its location and integrated design are considered to support these wider climate change mitigation outcomes.

OVERALL ASSESSMENT

1830. Overall, the Project has considered both climate change adaptation and mitigation through its location, design and supporting technical assessments. The flood modelling demonstrates that the proposed development can accommodate future flood conditions without materially increasing flood risk on surrounding properties, subject to the detailed design measures identified in the *Flood Risk Assessment.* The hydrological assessment also indicates that the Project will not exacerbate climate change-related effects on groundwater or Wharemaukū Stream baseflows.

1831. In addition, the comprehensive mixed-use development of land within the Metropolitan Centre Zone, together with the provision of walking, cycling and public transport connections, will support a more compact and accessible urban environment with opportunities to reduce reliance on private vehicles. Accordingly, the Proposal is considered to contribute to the climate change mitigation and adaptation outcomes identified in sections 22(2)(a)(vii) and (viii) of the FTAA, while appropriately managing the potential effects of climate change on the development and surrounding environment.

11.1.20 ASSESSMENT OF ACTUAL OR POTENTIAL EFFECTS CONCLUSION

1832. The assessment of environmental effects has considered the potential effects of the Proposal on the surrounding environment, having regard to the technical assessments prepared in support of the application, the existing characteristics of the Site and the nature and scale of development anticipated within the Metropolitan Centre Zone.

1833. The Proposal will result in substantial changes to the existing environment, including the establishment of residential, retail and commercial activities, new roads and infrastructure, modification of the existing landform and the reclamation of natural inland wetlands. These changes have been considered through an integrated design process involving planning, engineering, transport, ecology, hydrology, landscape and urban design specialists, with measures incorporated into the Proposal to avoid, minimise, remedy or otherwise manage the resulting effects.

1834. The key findings of the assessment are summarised as follows:

Ecological effects and wetland compensation:

- The Proposal will result in adverse ecological effects associated with the permanent loss of approximately 5.33ha of natural inland wetlands. The practicability of avoiding and minimising this loss has been considered through the design process, having regard to the distribution of wetlands across the Site and the infrastructure, flood management and development requirements associated with the comprehensive development of the Metropolitan Centre. The residual effects are proposed to be addressed through biodiversity compensation, principally comprising the establishment of approximately 5.44ha of indigenous wetland habitat. Bioresearches predicts that the proposed compensation will achieve no net loss of wetland extent and a net positive outcome

for wetland biodiversity values, subject to the successful implementation and ongoing management of the proposed measures.

Landscape and visual effects:

- The Proposal will result in the removal of the existing dune landforms and associated changes to the landscape character of the Site. These effects have been assessed in the context of the existing modified environment, the urban development anticipated by the District Plan and the proposed landscape response, including the establishment of a new western landform, indigenous planting and an integrated open space network. DCM Urban concludes that the enduring adverse landscape and visual effects will be no more than minor, subject to the proposed mitigation measures.

Cultural effects:

- The cultural effects associated with the loss of the existing dunes, wetlands and proposed treatment of the Wharemaukū Stream are acknowledged. The *Interim Cultural Impact Assessment* prepared by Te Ātiawa identifies concerns that have not been fully resolved through the current design, particularly in relation to dune removal. While the Applicant has considered the practicability of retaining these features, it is recognised that the technical and design considerations do not necessarily resolve the cultural effects identified by Ātiawa. Engagement is continuing, including consideration of further stream enhancement, mana whenua involvement in ecological restoration and monitoring, and potential measures to address residual cultural effects.

Freshwater and hydrological effects:

1835. The Proposal incorporates restoration and enhancement of the Wharemaukū Stream, establishment of the indigenous wetland complex, riparian planting, freshwater fauna management and measures to maintain groundwater recharge and stream baseflows. The ecological and hydrological assessments indicate that, following implementation of the proposed management and restoration measures, residual effects on indigenous fauna will generally be Low or Very Low, with positive outcomes anticipated for terrestrial and wetland biodiversity values.

Stormwater and flood hazard effects:

- The engineering assessments demonstrate that the proposed stormwater and flood management measures can appropriately manage the changes in runoff and flood storage associated with development. The Proposal will provide additional flood storage within the wetland complex and associated flood management areas, with flood levels generally maintained or reduced on surrounding land. The proposed attenuation, passive soakage and stormwater treatment measures will also assist in managing peak flows, groundwater recharge and water quality. These outcomes will be confirmed through detailed design and the requirements of the proposed consent conditions, including further flood modelling.

Transport and urban design effects:

- The transport assessment demonstrates that the proposed road network and surrounding intersections can accommodate the anticipated traffic demands associated with the development, subject to the proposed intersection upgrades and transport measures. The Town Centre Link Road, internal street network and pedestrian and cycling connections will improve connectivity through the Site and with the wider Paraparaumu Metropolitan Centre. The urban design assessment also identifies positive outcomes associated with the integrated development layout, range of housing typologies, street network and provision of public and private open spaces.

Other environmental effects:

- Other potential effects, including those associated with construction activities, earthworks, noise, geotechnical hazards, infrastructure servicing, contaminated land and archaeological values, have been assessed in the supporting technical reports. These effects are considered capable of being

appropriately managed through the proposed design, construction management measures, detailed engineering requirements and consent conditions.

1836. Overall, the assessment demonstrates that the majority of potential adverse environmental effects can be appropriately avoided, minimised or managed through the design of the Proposal and the recommended mitigation measures. The permanent loss of existing wetlands and dunes represents a significant change to the Site, with the wetland effects addressed through the proposed biodiversity compensation package and the landscape and visual effects managed through the proposed landform and landscape treatment. The outstanding cultural concerns identified by Ātiawa are acknowledged and remain the subject of ongoing engagement.

1837. Having regard to the findings of the technical assessments, the environmental management measures incorporated into the Proposal and the proposed consent conditions, it is considered that the adverse environmental effects of the Project can be appropriately managed, while recognising the residual effects and outstanding cultural matters identified above. The Proposal will also deliver substantial positive effects through the comprehensive development of land already identified for Metropolitan Centre activities, including additional housing, employment, improved transport connectivity, infrastructure, open space and ecological restoration. These effects and benefits are considered further in the statutory assessment in the following sections.

12. ASSESSMENT AGAINST PART 2 OF THE RMA – SCHED 5, CL5(1)(G)

1838. An assessment against sections 5, 6 and 7 of the RMA is provided in this section in accordance with the Clause (5)(1)(g) Schedule 5 of the FTAA, as well as Section 104(1) of the RMA.

12.1 RMA SECTION 5

1839. The purpose of the RMA as expressed in section 5 is to promote the sustainable management of natural and physical resources, with 'sustainable management' defined in section 5(2) as:

1840. In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—

(a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and

(c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.

1841. Overall, and based on the technical assessments accompanying this application, the Proposal meets the purpose and principles of the RMA. In particular:

- The Proposal provides for the comprehensive development of land already zoned and identified for urban development within the Paraparaumu Metropolitan Centre. It will deliver substantial additional housing, retail and commercial activities, employment opportunities, infrastructure and public open space, contributing to the social and economic wellbeing of the District. The development also represents an efficient use of land within an established urban environment, consistent with the outcomes anticipated by the Metropolitan Centre Zone and associated Structure Plan.

- The Proposal has been developed through an integrated design process, having regard to the Site's physical and environmental constraints, including the Wharemaukū Stream, existing wetlands, dune landforms and floodplain. While the Proposal will result in adverse effects, particularly through wetland loss and dune modification, the practicability of avoiding and

minimising these effects has been considered. The Proposal incorporates ecological compensation, stream enhancement, stormwater and flood management measures, and other mitigation and management requirements to address adverse environmental effects.

- The cultural effects identified by Te Ātiawa ki Whakarongotai, particularly in relation to dune modification and the Wharemaukū Stream, are acknowledged. Engagement is continuing regarding these matters and opportunities to address residual cultural effects. The relevant cultural considerations are addressed further in the assessment of section 6 and elsewhere in this application.

1842. Overall, having regard to the substantial social and economic benefits of the Proposal, its alignment with the planned development of the Metropolitan Centre, and the measures proposed to manage adverse environmental effects, it is considered that the Proposal is consistent with the sustainable management purpose of section 5 of the RMA.

12.2 RMA SECTION 6

1843. Section 6 of the RMA identifies matters deemed to be of national importance. In achieving the purpose of the RMA, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for these listed matters of national importance. Matters relevant to the Site are assessed in the following sections.

12.2.1 SECTION 6(A)

1844. The Proposal is considered to represent appropriate subdivision, use and development in terms of section 6(a), having regard to the following:

- The Site forms part of an already substantially modified coastal environment and is predominantly zoned Metropolitan Centre, with comprehensive urban development anticipated by the District Plan and Metropolitan Centre Zone Structure Plan

- The Proposal will result in the removal of the eastern dune and the modification and removal of the existing western dune. While a new dune-influenced landform will be established and planted with appropriate indigenous species, it is acknowledged that this will not replace all of the natural character values associated with the existing landforms. The practicability of retaining the dunes has been considered through the accompanying engineering and urban design assessments;

- Wharemaukū Stream will be retained generally within its existing alignment, with continuous flow maintained within the main channel and enhancement through indigenous riparian planting and localised variation in channel depth and substrate;

- The Proposal will result in the reclamation of approximately 5.34ha of existing natural inland wetlands. The practicability of avoiding and minimising this loss has been assessed, with the residual ecological effects proposed to be addressed through the establishment of a new indigenous wetland complex and associated long-term management measures;

- The proposed wetland complex, stormwater management areas and Wharemaukū Stream corridor will form part of an integrated blue-green network, providing opportunities for ecological and landscape enhancement and improved connections through the Site;

- The Proposal incorporates indigenous planting, riparian enhancement, open space and stormwater management measures that will contribute to the natural character and ecological values of the future urban environment; and,

- The adverse effects on natural character have been assessed in the *Landscape and Visual Impact Assessment*, including the effects associated with dune modification and removal. These effects have been considered alongside the proposed landscape enhancements, ecological restoration and compensation measures, and the urban development outcomes anticipated for the Site

12.2.2 SECTION 6(B)

1845. Section 6(c) of the RMA requires the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna as a matter of national importance.

1846. The *Assessment of Ecological Effects* prepared by Bioresearches identifies that the Site has been substantially modified by historic agricultural and horticultural activities and is predominantly vegetated in pasture. The assessment identifies the terrestrial habitats as having negligible to low ecological value and notes that the Site is not identified in the District Plan as an SNA or otherwise identified as an area of significant indigenous vegetation.

1847. The assessment nevertheless identifies ecological values associated with indigenous fauna and freshwater habitats, including avifauna, potential lizard habitat, the Wharemaukū Stream and natural inland wetlands. It assesses the effects of the Project on these values and identifies a package of effects management measures, including fauna management, wetland creation and restoration, and enhancement of the Wharemaukū Stream and associated riparian habitat.

1848. Relying on the findings of the *Assessment of Ecological Effects*, and subject to implementation of the effects management measures identified in that assessment, I consider that the Project appropriately recognises and provides for the matters in section 6(c) of the RMA.

12.2.3 SECTION 6(D)

1849. Section 6(d) of the RMA seeks to maintain and enhance public access to and along the coastal marine area, lakes and rivers.

1850. The Wharemaukū Stream extends along the southern part of the Site and forms part of the wider open space and recreational network within Paraparaumu. Public access to and along the Stream is therefore relevant to the consideration of Section 6(d).

1851. Importantly in terms of section 6(d), the Project will maintain and enhance opportunities for public access to and along the Wharemaukū Stream corridor. The proposed pedestrian and cycling network will integrate the Stream corridor with the wider development and provide connections between the Town Centre, Kapiti Road, Ihakara Street and surrounding areas. This will improve accessibility to the Stream corridor and its integration with the wider public open space and movement network.

1852. Importantly in terms of section 6(d), the Project will maintain and enhance opportunities for public access along and to the Wharemaukū Stream. The proposed pedestrian and cycling network will integrate the Stream corridor with the wider development and provide connections between the Town Centre, Kapiti Road, Ihakara Street and surrounding areas. This will increase the accessibility and legibility of the Stream corridor as part of the wider public open space and movement network.

1853. Accordingly, the Project seeks to respond positively to its location within the identified Coastal Environment and will maintain and enhance public access to and along the Wharemaukū Stream. It is therefore considered that the Project appropriately recognises and provides for the matter identified in Section 6(d) of the RMA.

12.2.4 SECTION 6(E)

1854. Section 6(e) of the RMA requires that the relationship of Māori and their culture and traditions with their ancestral lands, water, Sites, Wahi tapu, and other taonga be recognised and provided for.

1855. The Applicant has undertaken engagement with Te Ātiawa, including through the preparation of an *Interim Cultural Impact Assessment*. The assessment identifies the cultural values associated with the Site and the interconnected relationships between the Wharemaukū Stream, wetlands, dune landforms and wider landscape. It also identifies adverse cultural effects associated with the Proposal, particularly the proposed modification and removal of the dunes, reclamation of wetlands and treatment of the Wharemaukū Stream.

1856. The Proposal includes the retention and proposed enhancement of the Wharemaukū Stream, establishment of an indigenous wetland complex, and provision for mana whenua involvement in ecological restoration, monitoring and management. However, the Applicant acknowledges that these measures do not fully address the cultural concerns identified in the assessment, particularly in relation to the loss of the existing dune landforms.

1857. Engagement with Te Ātiawa is continuing, including consideration of opportunities for further stream naturalisation and measures to address residual cultural effects associated with dune modification and removal. These discussions will continue alongside the fast-track process, with any further agreed measures or proposed conditions to be provided to the Panel.

1858. Overall, the cultural values and effects identified by Te Ātiawa have been considered in the development and assessment of the Proposal. While some matters remain unresolved, the Applicant is committed to continuing engagement and identifying appropriate measures to respond to these effects. The cultural effects of the Proposal are addressed in further detail elsewhere in this application and in the accompanying CIA.

12.2.5 SECTION 6(H)

1859. Section 6(h) of the RMA requires the management of significant risks from natural hazards.

1860. The Site is subject to identified flood hazards associated with the Wharemaukū Stream and wider catchment, together with geotechnical hazards associated with weak and variable soils, shallow groundwater, liquefaction, lateral spreading and slope instability.

1861. The *Flood Risk Assessment* in **Appendix 15** demonstrates that the proposed earthworks, flood storage areas and stormwater management infrastructure have been designed to manage flood risk within and beyond the Site, including taking account of climate change. The *Geotechnical Assessment Report* in **Appendix 21** identifies low to moderate existing geotechnical risks, which can be appropriately managed through ground improvement, removal of unsuitable soils, engineered fill, appropriate foundation design and slope stability measures.

1862. Subject to implementation of the recommended engineering measures and proposed consent conditions, the technical assessments conclude that the identified natural hazards can be appropriately managed without materially increasing risks to the proposed development, adjoining land or infrastructure. Accordingly, the Proposal is considered to appropriately recognise and provide for Section 6(h) of the RMA.

12.3 RMA SECTION 7

1863. Section 7 lists other matters which all persons exercising functions and powers under the RMA must have particular regard to. Matters relevant to the Site and proposal are assessed below.

SECTION 7(A)

1864. Section 7(a) requires particular regard to be had to kaitiakitanga. The Applicant has engaged with Te Ātiawa through the development of the Proposal. The *Interim Cultural Impact Assessment* identifies the importance of the relationship between mana whenua and the Site's natural features, particularly the Wharemaukū Stream, wetlands and dune landforms, and the role of kaitiakitanga in their protection and management.

1865. The Proposal incorporates measures intended to support the ongoing management and enhancement of freshwater and ecological values, including the proposed indigenous wetland complex, enhancement of the Wharemaukū Stream corridor and long-term ecological management and monitoring. The proposed conditions also provide opportunities for mana whenua involvement in the implementation of relevant ecological and cultural management measures.

1866. While the Applicant acknowledges that some cultural concerns remain unresolved, particularly regarding the modification and removal of the dunes, ongoing engagement with Te Ātiawa is intended to further consider how kaitiakitanga can be recognised and provided for through the Project.

12.3.1 SECTION 7(B)

1867. Section 7(b) relates to whether a proposal involves the efficient use and development of natural and physical resources.

1868. The Proposal represents an efficient use and development of a large, strategically located site within the Metropolitan Centre Zone and in close proximity to the Paraparaumu town centre, public transport and existing infrastructure. It provides for a comprehensive mix of residential, commercial and retail activities, together with an integrated transport, open space network. The Proposal will enable a presently underutilised urban land resource to accommodate substantial housing and employment-generating activities in a manner envisaged in the District Plan.

12.3.2 SECTION 7(C)

1869. Section 7(c) of the RMA requires particular regard to be had to the maintenance and enhancement of amenity values.

1870. The Site is currently largely undeveloped and provides an area of openness within the surrounding urban environment. However, as identified in the *Landscape and Visual Impact Assessment*, its existing amenity values are influenced by its highly modified character, limited indigenous vegetation, modified waterways and wetlands, and the surrounding urban development and Kapiti Expressway. The assessment describes the receiving environment as having an overall urban character with remnant coastal landscape characteristics.

1871. Importantly, the existing open character of the Site does not represent its anticipated long-term character. The Site is located within the Metropolitan Centre Zone and is subject to the Metropolitan Centre Zone Structure Plan, which anticipates comprehensive urban development comprising residential, commercial, open space, transport and stormwater functions.

1872. The Project will result in a substantial change in the amenity and character of the Site as it transitions to an urban environment. However, the proposal incorporates a comprehensive landscape and open space framework, including recreational reserves and public open spaces, extensive landscape planting, pedestrian and cycle connections, retention and enhancement of the Wharemaukū Stream corridor, constructed wetland areas, and a connected blue-green network. The assessment identifies that these elements will contribute to recreation, landscape amenity, accessibility and the overall identity of the development.

1873. The layout and built form have also been developed to provide an integrated mixed-use extension to the Paraparaumu Metropolitan Centre, with the proposed street, open space and active-mode networks providing connectivity between residential areas, the Town Centre, Kapiti Road, Ihakara Street and the Wharemaukū Stream corridor.

1874. Overall, while the Project will materially change the existing amenity of the Site, that change is consistent with its planned urban context and will establish a high-quality urban environment with enhanced landscape, recreational, ecological and accessibility attributes. Accordingly, the Project appropriately maintains and enhances amenity values in accordance with section 7(c) of the RMA.

12.3.3 SECTIONS 7(D), (F) AND (G)

1875. Sections 7(d), (f) and (g) of the RMA relate to the intrinsic values of ecosystems, the quality of the environment, and the finite characteristics of natural and physical resources respectively.

1876. These matters are particularly relevant to the freshwater and ecological values of the Site. As detailed in the *Assessment of Ecological Effects*, the Site has been substantially modified through historic agricultural

and horticultural activities, with ecological values varying considerably across the Site. Terrestrial habitats are assessed as having negligible to low ecological value, while higher values are associated with the Wharemaukū Stream, natural inland wetlands and indigenous fauna.

1877. The Project will result in modification of the existing environment, including the loss of existing wetland habitat and modification of artificial watercourses. The assessment has applied the effects management hierarchy to the identified ecological effects. Measures incorporated into the Project include the retention and naturalisation of the Wharemaukū Stream, creation and restoration of indigenous wetland habitat, extensive indigenous riparian and terrestrial planting, and specific management measures for indigenous fauna. The Wharemaukū Stream will retain its upstream and downstream connectivity and is not proposed to be diverted or reclaimed.

1878. The assessment concludes that, following implementation of the proposed effects management measures, the residual effects on the ecological values assessed are generally Low, Very Low or result in a net gain, with the proposed wetland creation and restoration package specifically intended to address the significant effects arising from the loss of existing natural inland wetlands.

1879. Overall, the Project appropriately recognises the intrinsic values of ecosystems and the finite nature of the natural resources affected by the development. Together with the wider landscape, stormwater and open space measures incorporated into the Project, the proposed ecological restoration and enhancement will also contribute positively to the quality of the future environment. Accordingly, appropriate regard has been had to the matters in sections 7(d), (f) and (g) of the RMA.

12.3.4 SECTION 7(I)

1880. Section 7(i) of the RMA requires particular regard to be had to the effects of climate change. The Proposal has considered these effects through the Flood Risk Assessment, which incorporates climate change projections to 2130, including the SSP5-8.5 scenario.

1881. The Proposal incorporates approximately 26,000m³ of additional flood storage, together with integrated stormwater infrastructure, defined flood conveyance corridors and appropriate building platform levels. Higher flood hazard areas are largely accommodated within the proposed wetland and flood management areas, reducing the exposure of residential and commercial development to future flood events.

1882. The *Flood Risk Assessment* also demonstrates that flood levels and flows on surrounding land will generally be maintained or reduced, with further modelling required at the detailed design stage. Accordingly, the Proposal is considered to have had particular regard to the effects of climate change and incorporates measures to improve the long-term resilience of the Site and surrounding environment.

13. ASSESSMENT AGAINST RMA PLANNING DOCUMENTS – SCHED 5 CL5(1)(H), CL5(2), CL5(3)

1883. This section is provided in accordance with the Clauses 5(1)(h), 5(2) and 5(3) and clause 2(1) of Schedule 5 of the FTAA, as well as Section 104(1)(b) of the RMA which require an assessment of relevant provisions within:

- A national environmental standard;
- Other regulations made under the Resource Management Act 1991;
- A national policy statement;
- A New Zealand Coastal Policy Statement;
- a regional policy statement or proposed regional policy statement;

- a plan or proposed plan; and
- a planning document recognised by a relevant iwi authority and lodged with a local authority.

1884. For this proposal, the following documents are relevant:

- The New Zealand Coastal Policy Statement (NZCPS);
- National Policy Statement on Urban Development 2020 (NPS-UD);
- National Policy Statement for Freshwater Management 2020 (NPS-FM);
- National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB);
- National Policy Statement for Natural Hazards 2025 (NPS-NH);
- National Environmental Standard for Freshwater 2020 (NES-F);
- National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NES-CS);
- Regional Policy Statement for the Wellington Region 2013 (RPS);
- Natural Resources Plan (NRP);
- Kapiti Coast District Plan ('the District Plan')

A detailed assessment of the Proposal against the relevant provisions of the above documents is provided in the *Statutory Assessment* in **Appendix 2**. A summary of that assessment is provided in the following sections.

13.1 NEW ZEALAND COASTAL POLICY STATEMENT (NZCPS)

1885. The New Zealand Coastal Policy Statement 2010 (NZCPS), as amended in 2025, is relevant to the Proposal as the Site is located within the identified Coastal Environment. The provisions of particular relevance are Objectives 1, 2 and 6 and Policies 6, 13, 14 and 15, which address activities within the coastal environment, preservation and restoration of natural character, and protection of natural features and landscapes.

1886. The Landscape and Visual Impact Assessment prepared by DCM Urban (Appendix 25) considers these provisions and identifies the following matters:

- The Site is located within an established urban environment, separated from the coastline by existing development and the Kapiti Expressway. While the Site contains remnant dune landforms, wetlands and waterways, its landscape and natural character have been modified by previous land uses and surrounding urban development.
- The Metropolitan Centre Zone and associated Structure Plan expressly anticipate comprehensive urban development of the Site, including residential, commercial, transport, stormwater and open-space activities.
- The Proposal will remove the smaller eastern dune and substantially modify the western dune. While this will alter existing natural character values, a realigned and planted landform will be established along the Kapiti Expressway boundary, retaining an identifiable elevated landscape feature and providing visual relief and separation from the Expressway.
- The Wharemaukū Stream will be retained generally within its existing alignment and enhanced through indigenous riparian planting and habitat improvements. The proposed indigenous wetland

complex, associated planting and interconnected open-space network will also contribute to landscape and natural character outcomes across the Site.

- The Site is not identified as an Outstanding Natural Feature or Landscape. The LVIA recognises the effects of dune modification while identifying opportunities to establish an integrated landscape framework that responds to the planned urban character of the Metropolitan Centre.

1887. Overall, the Proposal is considered to appropriately manage effects on the coastal environment while providing for the comprehensive urban development anticipated for the Site. Although the modification and removal of the existing dunes will result in adverse effects on natural character, the proposed landform, indigenous planting, stream enhancement and wetland restoration measures provide a coordinated landscape response relevant to the objectives and policies of the NZCPS.

13.2 NATIONAL POLICY STATEMENT FOR URBAN DEVELOPMENT 2022 (NPS-UD)

1888. The NPS-UD came into effect on 20 August 2020 and replaced the National Policy Statement on Urban Development Capacity 2016. The NPS-UD applies to:

> *All local authorities that have all or part of an urban environment within their district or region (i.e. tier 1, 2 and 3 local authorities); and,*
>
> *Planning decisions by any local authority that affect an urban environment.*

1889. The NPS-UD applies to both regional and territorial authorities. The Wellington urban environment is identified as a Tier 1 urban environment. GWRC has given effect to the NPS-UD through changes to the Regional Policy Statement, while Kapiti Coast District Council has partially implemented the NPS-UD through Plan Change 2, with further implementation occurring through its wider growth and planning framework.

1890. A detailed assessment of the Project against the objectives and policies of the NPS-UD is provided in Table 7 of the *Statutory Assessment,* with an overarching assessment provided below.

1891. The *Economic Assessment* provided in Appendix 37 identifies the Project as a comprehensive and strategic use of a key live-zoned site within the Paraparaumu town centre. The Site is adjacent to Coastlands, the existing large format retail area, the aquatic centre and Council offices, and represents one of the few remaining opportunities to expand the District's primary centre in a coordinated manner. The Economic Assessment considers that a comprehensive masterplanned approach is important to avoid fragmented or suboptimal development of the Site and the consequential loss of potential economic, social and urban form benefits.

1892. The Project will deliver a mixed-use development comprising approximately 593 dwellings, 20,000m² of large format retail and 3,800m² of ground-floor commercial and specialty retail floorspace. The Economic Assessment considers that co-locating housing, employment, retail and services in this location will enhance accessibility, support agglomeration economies and improve the overall performance and efficiency of the Paraparaumu town centre.

1893. From a housing perspective, the Proposal represents a significant addition to supply within a capacity-constrained market. The Economic Assessment estimates annual greenfield demand of approximately 236 dwellings, including the NPS-UD medium-term demand buffer, and identifies only approximately 6.2 years of existing and pipeline greenfield capacity. This is assessed as insufficient to meet the medium-term requirements of Policy 2 of the NPS-UD. The addition of the Project would increase available greenfield capacity to approximately 8.7 years, making a material contribution towards addressing that shortfall.

1894. The Proposal will also provide a diverse range of housing typologies, including standalone, courtyard, duplex, terrace and apartment housing. This is responsive to recent changes in the Kapiti housing market, where the *Economic Assessment* identifies increasing demand for more diverse and efficient housing

forms. The proposed dwellings are expected to have an average sale price of approximately $810,000, compared with an average of approximately $930,000 for recently constructed dwellings across the District. The Economic Assessment therefore considers the Project to be positioned toward the more affordable end of the new-build market and to improve housing accessibility and market efficiency. This is particularly relevant to Objective 2 and the NPS-UD's direction to support competitive land and development markets.

1895. The commercial component similarly contributes to a well-functioning urban environment. The Economic Assessment identifies an existing undersupply of LFR floorspace of approximately 6,600m², with effective demand projected to increase substantially over the medium to long term. It considers the proposed 20,000m² of LFR to be broadly aligned with this demand trajectory and appropriate having regard to typical development lead times. Importantly, the proposed retail activities are assessed as an expansion of the existing Paraparaumu town centre rather than the establishment of a competing centre. The Proposal will broaden the range of retail and services available, reduce expenditure leakage, support agglomeration benefits and consolidate commercial activity in a highly accessible location.

1896. The mixed-use nature of the Proposal is also important in NPS-UD terms. The combination of substantial residential development with employment, retail and services, together with the proposed walking and cycling network, open spaces and connections to the surrounding urban area, will enable residents to access a range of everyday needs within or in close proximity to the development. The Project therefore supports the accessibility, housing choice and employment outcomes associated with a well-functioning urban environment.

1897. A further important benefit of the Proposal is that it enables substantial urban development within an established Metropolitan Centre in a location that is already zoned and planned for urban development and is effectively 'infrastructure ready'. The infrastructure assessments demonstrate that the proposed development can be serviced through existing network capacity and infrastructure delivered as part of the Proposal, without relying on major off-site downstream infrastructure upgrades to enable the proposed growth. As with any development of this scale, delivery will occur progressively, with infrastructure provision coordinated with the relevant stages of development. This represents an efficient use of existing urban infrastructure and provides greater certainty that the proposed housing and commercial development can be delivered without being dependent on wider network upgrades or substantial off-site infrastructure investment by KCDC.

1898. The *Economic Assessment* also identifies substantial wider economic benefits. The approximately $527.5 million investment is estimated to generate approximately $160.2million in direct construction GDP and 1,000 FTE jobs, increasing to approximately $313.3million in GDP and 1,765 FTE jobs when indirect supply-chain effects are included. Once operational, the retail and commercial component is estimated to contribute approximately $48.8 million in GDP per annum.

1899. The Project also responds to Objective 4 of the NPS-UD by enabling the urban environment to develop and change over time in response to the diverse and changing needs of people, communities and future generations. In particular, it provides a substantial increase in housing capacity and diversity alongside additional employment, retail and service opportunities on a strategically located site that is already zoned and anticipated for comprehensive urban development.

1900. Overall, relying in particular on the findings of the *Economic Assessment*, the Proposal will make a significant contribution to achieving the outcomes sought by the NPS-UD. It will increase housing supply and choice, contribute materially towards addressing the identified medium-term greenfield capacity shortfall, provide comparatively affordable new-build housing, expand and strengthen the existing Paraparaumu town centre, and integrate housing, employment, services and amenities in a highly accessible location. These outcomes support a well-functioning urban environment and a competitive land and development market, consistent with the objectives and policies of the NPS-UD.

1901. This conclusion is also consistent with the overall conclusion reached by the Project urban designer in the assessment of the NPS-UD contained in the *Urban Design Statement*:

In conclusion, the proposed land uses and spatial structure are considered to offer a positive contribution to the existing town centre and the wider district, successfully accommodating growth and promoting a well-functioning urban environment.

13.3 NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT 2020 (NPS-FM)

1902. The National Policy Statement for Freshwater Management ('NPS-FM') provides direction on managing activities that affect the health of freshwater. The NPS-FM is premised on the fundamental concept of Te Mana o te Wai, which recognises that protecting the health of freshwater is fundamental to the health and wellbeing of the wider environment. Te Mana o te Wai establishes a hierarchy of obligations that prioritises the health and wellbeing of water bodies and freshwater ecosystems, followed by the health needs of people and then the ability of people and communities to provide for their social, economic and cultural wellbeing.

1903. A detailed assessment of the relevant objective and policies of the NPS-FM is provided in **Table 9** of the *Statutory Assessment*. Overall, it is considered that the Project is consistent with the relevant direction of the NPS-FM for the following reasons:

- The freshwater environment within the Site has been substantially modified by historic drainage and agricultural activities. It comprises the Wharemaukū Stream, an artificial central drain and other smaller drains, together with nine natural inland wetlands totalling approximately 5.33ha. The existing wetlands are predominantly exotic pastoral wetlands with low to moderate ecological values. Notwithstanding their modified condition, the proposed loss of these wetlands has been assessed as resulting in moderate to high residual adverse ecological effects.

- The proposal has applied the effects management hierarchy in the NPS-FM, including consideration of the practicability of avoiding and minimising wetland loss. The existing wetlands are dispersed throughout the Site, and their retention has implications for the proposed road network, earthworks, flood management, servicing infrastructure and the integrated urban form anticipated by the Metropolitan Centre Zone. An assessment of wetland avoidance is provided separately in **Section xx** of this Application, supported by the engineering and urban design avoidance memoranda. That assessment considers the practicability of retaining the existing wetlands, including the wider consequences of alternative development configurations, and explains the approach taken to the avoidance and minimisation steps of the effects management hierarchy.

- The Project incorporates ecological compensation for the residual wetland effects through the creation of approximately 5.44ha of indigenous wetland habitat within the Site. The proposed wetland complex will comprise a mosaic of shallow water, marsh, swamp and seasonally inundated habitats, integrated with the Wharemaukū Stream corridor and wider flood storage area. The proposed wetland creation exceeds the extent of wetland loss and is intended to achieve no overall net loss of wetland extent. The *Wetland Residual Effects Analysis Report* also predicts a net gain in ecological values, with the Biodiversity Compensation Model identifying a compensation score approximately 28.5% higher than the impact score.

- The proposed wetland complex will be subject to ongoing ecological management, monitoring, maintenance and adaptive management to support its successful establishment and the achievement of the predicted ecological outcomes. These measures are incorporated into the draft *Ecological Management Plan* and draft consent conditions.

- Loss of stream extent has been avoided. The Wharemaukū Stream will be retained on its existing alignment and enhanced through naturalisation, indigenous riparian planting and habitat improvements. Direct effects on the stream have been minimised, with works primarily associated with crossings and earthworks in proximity to the Stream.

- Watercourse 1 has been assessed as an artificial watercourse. Approximately 290m of its upper extent will be piped, while the remaining approximately 550m will be realigned through an open

planted swale and the proposed constructed biodiversity wetland, maintaining hydrological connectivity between the upper catchment and the Wharemaukū Stream.

- Potential effects on indigenous freshwater fauna, including mortality, habitat disturbance and effects on fish passage and connectivity, will be managed through the proposed freshwater restoration measures, construction management and native fish recovery and relocation protocols set out in the *GWRC Draft Conditions*.

- The proposal incorporates an integrated approach to freshwater management, with stormwater treatment, attenuation, flood storage and ecological restoration considered together as part of the wider masterplan. The proposed stormwater and flood management infrastructure has been designed having regard to anticipated climate change effects and the need to manage runoff and potential effects on the Wharemaukū Stream and downstream receiving environments. Erosion and sediment controls will also be implemented during construction to minimise adverse effects on freshwater ecosystems.

- The Project will contribute to the social and economic wellbeing of the Kapiti Coast community through the provision of approximately 600 dwellings, retail and commercial activities, employment opportunities, public open space and supporting infrastructure within an area specifically zoned for metropolitan centre development. These benefits are relevant to Policy 15 of the NPS-FM, although they are not relied upon as a substitute for appropriately managing adverse effects on freshwater ecosystems.

Overall, while the Project will result in the loss of existing natural inland wetlands, those effects have been expressly assessed through the effects management hierarchy, including the separate consideration of practicable avoidance and minimisation measures. The proposed ecological compensation is intended to achieve no overall net loss of wetland extent and a net gain in ecological values. When considered alongside the retention and enhancement of the Wharemaukū Stream, improved riparian habitat, management of indigenous freshwater fauna and integrated stormwater and flood management, the Project is considered to appropriately respond to the freshwater ecosystem health outcomes sought by the NPS-FM, subject to the decision-maker being satisfied that the relevant requirements of the effects management hierarchy have been met.

13.4 NATIONAL POLICY STATEMENT OF INDIGENOUS BIODIVERSITY 2023 (NPS-IB)

1904. The NPS-IB provides direction on the protection, maintenance and restoration of terrestrial indigenous biodiversity, with the objective of ensuring there is at least no overall loss of indigenous biodiversity while recognising the social, economic and cultural wellbeing of people and communities.

1905. While the NPS-IB has some application to natural inland wetlands, particularly in relation to restoration and increasing indigenous vegetation cover, the management of adverse effects on natural inland wetlands is principally addressed under the NPS-FM, as assessed separately above.

1906. A detailed assessment of the relevant objective and policies of the NPS-IB is provided in Table 9 of the *Statutory Assessment*. Overall, the Project is considered consistent with the relevant direction of the NPS-IB for the following reasons:

- The Site is predominantly modified exotic grassland and scrubland, with negligible to low terrestrial ecological values. No Significant Natural Areas ('SNAs') are identified within the Site, and the specific provisions relating to the protection of SNAs are therefore not applicable.

- The Project incorporates indigenous planting associated with the Wharemaukū Stream corridor, constructed wetland margins, open space areas and proposed hill landform. This will increase indigenous vegetation cover, improve habitat quality and ecological connectivity, and is expected to achieve a net gain in terrestrial ecological values, consistent with Policies 13 and 14.

- The Site has moderate ecological value for avifauna, including habitat for New Zealand pipit. Potential effects during vegetation clearance will be managed through the proposed Avifauna Management Plan, including breeding-season restrictions where practicable and pre-clearance nesting surveys. Residual effects are assessed as Low.

- Extensive targeted surveys detected no lizards or bats within the Site. Notwithstanding this, a precautionary approach is proposed for lizards through the implementation of a Lizard Management Plan, including salvage and relocation measures where required. No specific bat management measures are considered necessary.

- Engagement has been undertaken with Te Ātiawa ki Whakarongotai, with opportunities for ongoing involvement in the detailed design, implementation and monitoring of ecological restoration measures, recognising the role of tangata whenua as kaitiaki.

- The proposed ecological management framework includes species-specific management plans, monitoring, maintenance and adaptive management to support the establishment and long-term functioning of indigenous habitats.

- The Project will provide substantial housing, retail and commercial development within the Metropolitan Centre Zone, alongside ecological restoration and enhancement measures, consistent with Policy 10 of the NPS-IB.

1907. Overall, the Project will replace areas of highly modified exotic vegetation with a connected network of indigenous planting and habitats. The proposed restoration and management measures are expected to appropriately manage adverse effects on indigenous terrestrial biodiversity and achieve a net gain in terrestrial ecological values. Accordingly, the Project is considered consistent with the relevant direction of the NPS-IB.

13.5 NATIONAL POLICY STATEMENT FOR NATURAL HAZARDS 2025 (NPS-NH)

1908. The National Policy Statement for Natural Hazards 2025 (NPS-NH) establishes a consistent, risk-based approach to managing natural hazard risks associated with subdivision, use and development. A detailed assessment against the objective and policies of the NPS-NH is provided in Table 10 of the Statutory Assessment.

1909. The *Geotechnical Assessment Report* prepared by Torlesse and the *Flood Risk Assessment* have assessed the natural hazard risks associated with the Proposal, including the proposed mitigation measures. The following is noted:

- **Geotechnical risks:** Torlesse has assessed the risks associated with landslips, active faults and liquefaction (including lateral spreading) using the NPS-NH risk matrix. Subject to the recommended engineering measures, all residual risks are assessed as low.

- **Geotechnical mitigation:** The proposed earthworks, removal of unsuitable soils, engineered fill, foundation design and construction monitoring will appropriately manage the identified risks. Torlesse also concludes that the proposed works are unlikely to worsen geotechnical hazards on adjoining land or infrastructure.

- **Flood risk:** The *Flood Risk Assessment* adopts the NPS-NH risk-based framework and identifies generally low residual flood risk within the proposed residential and commercial development areas. Higher flood hazard areas are concentrated within the proposed wetland and flood management areas.

- **Flood mitigation:** The Proposal incorporates reconfigured drainage networks, defined flood conveyance corridors, appropriate building levels and approximately 26,000 m³ of additional flood storage during the 1% AEP event.

- **Effects on surrounding properties:** The *Flood Risk Assessment* identifies no material change in off-site flood hazard classifications. The *Geotechnical Assessment Report* also identifies negligible risk of settlement affecting neighbouring assets from temporary dewatering.

- **Climate change:** The *Flood Risk Assessment* considers climate change projections to 2130, including the SSP5-8.5 scenario, extending beyond the 100-year assessment period required by the NPS-NH.

- **Further investigations and detailed design:** Both assessments rely on site-specific investigations and modelling, with further geotechnical investigations, detailed engineering design, flood modelling and construction monitoring proposed through consent conditions to address residual uncertainties.

1910. Overall, the *Geotechnical Assessment Report* and *Flood Risk Assessment* demonstrate that the identified natural hazard risks can be appropriately managed through the proposed mitigation measures and consent conditions. The Proposal is therefore considered consistent with the objective and policies of the NPS-NH.

13.6 NATIONAL POLICY STATEMENT FOR INFRASTRUCTURE 2025 (NPS-I)

1911. The National Policy Statement for Infrastructure 2025 (NPS-I) recognises the importance of infrastructure in supporting urban development, economic and social wellbeing, and community resilience. A detailed assessment of the Proposal against the relevant objectives and policies of the NPS-I is provided in Table 11 of the *Statutory Assessment*.

1912. The Proposal is considered consistent with the relevant objectives and policies of the NPS-I for the following reasons:

The proposed transport, water supply, wastewater, stormwater and flood management infrastructure will enable comprehensive residential and commercial development within the Metropolitan Centre Zone, consistent with the District Plan Structure Plan.

The location and configuration of the infrastructure have been informed by the Site's physical and environmental constraints, including existing wetlands, Wharemaukū Stream, topography, flood hazards and connections to surrounding infrastructure networks.

The proposed Link Road, internal transport connections and three-waters infrastructure have been developed through an integrated design process involving engineering, transport, hydrology, ecology and urban design considerations.

The Proposal provides for the coordinated delivery of infrastructure alongside residential and commercial development, with detailed design, construction and ongoing management requirements addressed through the proposed conditions of consent.

1913. Overall, the infrastructure components of the Proposal are considered consistent with the relevant objectives and policies of the NPS-I. The Proposal provides for the coordinated delivery of infrastructure necessary to support the planned urban development of the Site, while incorporating measures to manage associated adverse environmental effects.

13.7 NATIONAL ENVIRONMENTAL STANDARDS FOR FRESHWATER REGULATIONS 2020 (NPS-F)

1914. The Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NPS-F) regulates activities that pose a risk to the health of freshwater and freshwater ecosystems. The regulation has effect from September 3 2020 and as such, all resource consents must consider the provisions of the NES.

1915. The NES includes provisions for rivers and wetlands as well as farming activities. The resource consent application will include seeking consent under the NES for urban development that includes wetland reclamation, earthworks and diversion of water within 100m and 10m of a wetland and for a culvert within a watercourse.

13.7.1 REGULATION 45C – URBAN DEVELOPMENT

1916. Under Regulation 45C, for a resource consent for urban development that affects natural inland wetlands, the decision maker must be satisfied that –

(a) satisfied itself that the urban development—

(i) will contribute to a well-functioning urban environment; and

(ii) will provide significant national, regional, or district benefits; and

(b) satisfied itself that—

(i) there is no practicable alternative location for the activity within the area of the development; or

(ii) every other practicable alternative location in the area of the development would have equal or greater adverse effects on a natural inland wetland; and

(c) applied the effects management hierarchy.

1917. The above matters are also repeated as matters of discretion under Regulation 45C(11). Each of the above matters is addressed below.

WELL-FUNCTIONING URBAN ENVIRONMENT

Refer also assessment of Project against Policy 1 of the NPS-UD in the Statutory Assessment.

1918. At its core, the Project will deliver a well-functioning urban environment. The Proposal provides for the comprehensive development of a large and strategically located site adjoining the existing Paraparaumu Metropolitan Centre, delivering a substantial range of new housing alongside retail and commercial activities, an integrated transport network, public open space and ecological enhancement.

1919. Importantly, the Project does not represent an isolated residential development. Rather, it provides for a mixed-use extension to the existing Paraparaumu urban area and Metropolitan Centre, with the different components of the development planned comprehensively to support one another and integrate with the surrounding urban environment.

1920. The Site is strategically located immediately adjoining the Paraparaumu Metropolitan Centre and within the existing Paraparaumu urban area. The Project will enable a significant amount of additional residential and business development in a location where residents will have convenient access to existing employment, retail, community facilities, services and transport infrastructure. In this respect, the Proposal represents an efficient and logical extension of the existing urban environment rather than dispersed or isolated urban growth.

1921. The Proposal will provide 593 new residential units across a diverse range of housing typologies, comprising 219 apartments, 186 townhouses, 135 standalone houses, 32 duplexes and 21 courtyard homes. The dwelling mix includes one- through five-bedroom homes, providing opportunities to accommodate households with differing needs, preferences and means. The *Economic Assessment* also identifies that the Project will make a material contribution to addressing the District's identified housing capacity constraints, increasing estimated greenfield housing capacity from approximately 6.2 years to 8.7 years.

1922. The proposed residential development is integrated with a substantial range of retail and commercial activities. Approximately 20,000m² of large format retail and 3,800m² of commercial and specialty retail

floorspace is proposed. This mix of activities will provide opportunities for residents to access employment, goods and services within or close to the development, reducing the need to travel elsewhere to meet everyday needs.

1923. The Project will strengthen and extend the function of the existing Paraparaumu Metropolitan Centre. Rather than establishing a competing or disconnected centre, the *Economic Assessment* considers the development to represent an expansion of the existing centre, broadening the range of retail and services available and supporting greater expenditure retention, agglomeration benefits and local economic self-sufficiency.

1924. The Proposal incorporates a connected movement network designed to accommodate a range of transport modes. This includes the new Link Road between Kapiti Road/Arawhata Road and Ihakara Street, the extension of Iver Trask Place, dedicated cycling infrastructure, pedestrian and shared-path connections, and connections to the surrounding street network. Collectively, these connections will improve permeability through the Site and provide residents, workers and visitors with a range of options for accessing the development and the wider Paraparaumu urban area.

1925. The Site's location also provides access to the wider public transport network, including the Paraparaumu railway station and existing bus services. The Link Road has been designed to be capable of accommodating future bus services should the public transport network be extended through the Site. The combination of increased residential densities, employment and commercial activities within an accessible urban location supports greater use of public and active transport and provides opportunities to reduce reliance on private vehicle travel over time.

1926. A comprehensive network of public and private open spaces, landscaped areas and pedestrian and cycling connections is integrated throughout the development. These spaces will provide opportunities for recreation, movement, social interaction and amenity, while also providing visual relief within the more intensively developed parts of the Site. The open space network will connect the residential and commercial areas with the Wharemaukū Stream and wetland environments and assist in establishing a strong and distinctive sense of place.

1927. The Project has also been designed in response to the Site's freshwater and ecological environment. While development will necessarily involve substantial modification of the presently largely undeveloped Site, the Wharemaukū Stream will be retained on its existing alignment and enhanced through naturalisation, riparian planting and habitat improvements. The Project also incorporates substantial indigenous wetland creation and restoration and associated riparian and terrestrial planting. The *Assessment of Ecological Effects* identifies that, following implementation of the proposed effects management measures, the Project will result in positive ecological outcomes across a range of terrestrial and freshwater habitats.

1928. The Proposal has been designed in response to the flood hazard affecting the Site. The Site presently performs an important flood conveyance and storage function within the wider Wharemaukū catchment. The proposed earthworks, stormwater infrastructure, stream and wetland works and development platforms have therefore been designed together to enable urban development while appropriately managing flood risk within the Site and beyond its boundaries.

1929. The Proposal will also significantly transform the landscape and amenity of the Site. The Site is presently characterised predominantly by modified pasture and exotic vegetation, remnant dune landforms, wetlands and waterways within an established urban setting. The landscape strategy will establish a substantially more structured network of streets, open spaces, planted corridors and ecological areas. This will enable the increased intensity of development to be accommodated while providing appropriate levels of amenity for residents and users of the development and an integrated interface with the surrounding urban environment.

1930. Ongoing engagement with mana whenua will be provided for through the proposed consent conditions, particularly in relation to freshwater, ecological and landscape matters. This includes opportunities for mana whenua involvement in the detailed design, implementation and monitoring of the Wharemaukū Stream enhancement works and proposed wetland compensation area, including opportunities to incorporate mātauranga Māori and cultural values into the restoration and ongoing management of these environments.

1931. The comprehensive nature of the development is particularly important to its contribution to a well-functioning urban environment. Housing, business activities, transport infrastructure, open space, stormwater management, ecological enhancement and landscape outcomes have not been planned as separate components. Rather, they form part of an integrated masterplanned development which seeks to ensure that increased development capacity is accompanied by the infrastructure, accessibility, amenity and environmental outcomes necessary to support it.

1932. The Project will therefore contribute to a well-functioning urban environment by:

- providing 593 dwellings across a diverse range of housing typologies and sizes, materially increasing housing supply and choice within Paraparaumu;
- providing approximately 23,800m² of retail and commercial floorspace, supporting additional employment, retail and service opportunities;
- locating substantial additional development immediately adjoining the existing Paraparaumu Metropolitan Centre and within the established urban area;
- enabling residents to access employment, shops, services, community facilities and open space within or close to the development;
- providing a connected and permeable transport network accommodating vehicles, walking and cycling and integrating with the surrounding transport network;
- supporting access to existing and future public transport and providing opportunities to reduce reliance on private vehicles;
- establishing an integrated network of public open space, landscaping, pedestrian and cycling connections and blue-green corridors;
- retaining and enhancing the Wharemaukū Stream and providing substantial wetland, riparian and terrestrial ecological restoration;
- integrating stormwater and flood management into the overall development and improving resilience to natural hazards and the effects of climate change; and
- providing for ongoing mana whenua involvement and opportunities for cultural values and mātauranga Māori to inform detailed design and ecological enhancement.

1933. Overall, the Project represents a substantial, comprehensively planned mixed-use extension of Paraparaumu's existing urban environment. It will materially increase both housing and business development capacity in a highly accessible location while simultaneously delivering the transport connections, open space, ecological enhancement, infrastructure and hazard-management measures necessary to support that growth.

1934. For these reasons, and having regard to the conclusions of the *Economic Assessment* and *Urban Design Statement* and other specialist assessments supporting the application, the Proposal is considered to make a significant positive contribution to achieving the well-functioning urban environment envisaged by Objective 1 and Policy 1 of the NPS-UD.

SIGNIFICANT NATIONAL REGIONAL OR DISTRICT BENEFITS

1935. To avoid repetition, the Proposal will deliver the benefits of urban development that are consistent with the outcomes identified within well-functioning urban environments as described above and in Section 13.1 below. For completeness, some of the Proposal's benefits are set out below.

Economic Benefits

1936. The *Economic Assessment* identifies significant economic benefits arising from the construction and operation of the Project. The approximately $527.5 million investment is estimated to generate $160.2 million in direct GDP and 1,000 FTE jobs during construction, increasing to approximately $313.3 million in GDP and 1,765 FTE jobs when indirect effects are included.

1937. Once operational, the retail and commercial components are estimated to contribute approximately $48.8 million in GDP annually, alongside benefits associated with increased employment, reduced expenditure leakage and strengthening the role and function of the Paraparaumu Metropolitan Centre.

1938. The Project will also deliver 593 new dwellings, increasing estimated greenfield housing capacity within the District from approximately 6.2 years to 8.7 years. Collectively, these outcomes represent significant economic, employment and housing benefits at the district and regional level.

Housing Benefits

1939. With respect to the housing supply benefits of the Project, the *Economic Assessment* identifies the following:

- The Project will deliver 593 new dwellings, comprising a diverse mix of apartments, townhouses, courtyard homes, duplexes and standalone houses, substantially increasing housing choice within Paraparaumu.
- The proposed dwellings are expected to have an average sale price of approximately $810,000, compared with approximately $930,000 for recently constructed dwellings across the District, positioning the development toward the more affordable end of the new-build market.
- The *Economic Assessment* identifies approximately 6.2 years of existing and pipeline greenfield housing capacity within the District. The Project would increase this to approximately 8.7 years, making a material contribution towards meeting medium-term housing demand.
- The mix of higher-density and smaller housing typologies responds to changing household needs and demand for a broader range of housing options, while enabling more efficient use of a strategically located site adjoining the Paraparaumu Metropolitan Centre.
- The scale of the Project will increase housing supply and competition within the local market and improve access to housing in a location close to employment, retail, services, public transport and other amenities.

1940. The housing outcomes provided above present clear and tangible regional and district benefits.

Social Benefits

1941. Social benefits will include the following significant district benefits:

- The Proposal will provide approximately 593 new homes across a range of housing typologies and densities, materially increasing housing supply and choice within Paraparaumu and providing for the needs of a broad demographic.
- The Project will provide a comprehensively planned mixed-use extension to the Paraparaumu Metropolitan Centre, integrating residential development with retail, commercial, employment and community activities. This will provide residents with convenient access to employment, goods and services and contribute to the vitality and function of the wider town centre.
- The Proposal will improve connectivity and accessibility within this part of Paraparaumu through the new Link Road between Kapiti Road/Arawhata Road and Ihakara Street, the extension of Iver Trask Place, and a network of walking and cycling connections. These connections will improve

movement through the Site and connectivity between surrounding residential areas, the Metropolitan Centre and the wider transport network.

- The development will provide an extensive and integrated open space network, including landscaped public spaces, pedestrian and cycling connections and blue-green corridors associated with the Wharemaukū Stream and wetland areas. These spaces will provide opportunities for recreation, social interaction and community use and contribute positively to the health and wellbeing of future residents and the wider community.

- The enhancement of the Wharemaukū Stream will improve the quality and amenity of these areas and provide opportunities for the community to experience and engage with the Site's freshwater and ecological environments.

- The substantial residential, retail and commercial components of the Project will generate employment opportunities during both construction and operation, while increasing the range of employment, retail and service opportunities available within Paraparaumu.

- The integration of housing, employment, services, open space and transport connections within a single comprehensively planned development will support the establishment of a diverse, accessible and connected community, with positive effects on social wellbeing for future residents and the wider Kapiti Coast community.

Environmental Restoration and Enhancement

1942. The Project will deliver significant environmental restoration and enhancement benefits as part of the comprehensive development of the Site. These include the retention and enhancement of the Wharemaukū Stream, creation and restoration of indigenous wetland habitat, extensive indigenous riparian and terrestrial planting, and improved habitat for indigenous fauna.

1943. The *Assessment of Ecological Effects* identifies that, following implementation of the proposed effects management measures, the Project will result in net gains in wetland and terrestrial habitat values, alongside improvements to the ecological function and habitat quality of the Wharemaukū Stream corridor.

1944. These outcomes will substantially improve the ecological quality and biodiversity values of a presently highly modified site and represent a significant environmental benefit at the district level.

Enhanced Connectivity and Multi-Modal Transport

1945. The Proposal will establish a connected public roading and active transport network through the Site, including the new Link Road connecting Kapiti Road/Arawhata Road with Ihakara Street. This will improve connectivity through the Site and integrate the proposed residential, retail, commercial and open space areas with the surrounding Paraparaumu urban area.

1946. The Proposal also provides for the extension of Iver Trask Place, initially for pedestrian and cycle access with provision for a future vehicle connection, together with connections to Brett Ambler Way and the wider street network. These connections will improve permeability and provide convenient walking and cycling access between the Site, the adjoining Metropolitan Centre and surrounding neighbourhoods.

1947. The Site is also located close to the Paraparaumu railway station and existing bus network. The concentration of new housing, employment, retail and other activities in this accessible location will support public and active transport and reduce reliance on private vehicle travel.

1948. Overall, the transport network forms an integral part of the comprehensive development of the Site and will improve accessibility and connectivity between housing, employment, services and the Paraparaumu Metropolitan Centre.

Flood Hazard Mitigation

1949. The Proposal will provide flood hazard mitigation benefits through an integrated approach to earthworks, stormwater management, flood storage and the establishment of the proposed wetland compensation area. The *Flood Risk Assessment* identifies the following:

- The Proposal will provide approximately 26,000m³ of additional flood storage during the 1% AEP event, increasing the overall flood storage capacity within the Site.
- The proposed earthworks, development platforms, drainage infrastructure and flood storage areas have been designed together to maintain flood conveyance through the Site and manage flood levels during significant storm events.
- Flood modelling indicates that flood levels and flows on surrounding land will generally be maintained or reduced, with no material change in off-site flood hazard classifications.
- The flood management system has been assessed against future climate change scenarios to 2130, providing for the management of increased rainfall and flood risks over the longer term.

1950. The integrated flood management approach will improve the resilience of the Site to significant storm events while providing additional flood storage capacity within the wider Wharemaukū Stream catchment. These measures represent a positive outcome of the Proposal, with benefits extending beyond the development itself.

BENEFITS OF REGIONALLY SIGNIFICANT INFRASTRUCTURE

1951. Objective 10 of the RPS seeks to ensure that the social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected. Policy 7 of the RPS also seeks to recognize the social, economic, cultural and environmental benefits of regionally significant infrastructure, Policy 8 of the RPS seeks to protect regionally significant infrastructure, and Policy 39 seeks to recognise the benefits from renewable energy and regionally significant infrastructure.

1952. There is an inherent acknowledgement in the RPS that regionally significant infrastructure can provide benefits both within and outside of the region. This includes, among other things, the social, economic, cultural and environmental benefits of energy generated from regionally significant infrastructure.

1953. The Project includes the new and extended regionally significant infrastructure including water supply, wastewater, stormwater, power and roading infrastructure. The provision and extension of this infrastructure will enable the comprehensive urban development of the Site and support the delivery of additional housing, business and employment opportunities adjoining the Paraparaumu Metropolitan Centre. Accordingly, the benefits associated with the provision, use and development of regionally significant infrastructure are an important positive effect of the Project and are consistent with the direction of the RPS to recognise and provide for those benefits.

NO OTHER PRACTICABLE LOCATION

1954. As above, under Regulation 45C(6)(b) a council must not granted consent unless it has -

> *(b) satisfied itself that—*
>
> *(i) there is no practicable alternative location for the activity within the area of the development; or*
>
> *(ii) every other practicable alternative location in the area of the development would have equal or greater adverse effects on a natural inland wetland;*

1955. The High Court in *Tauranga Environmental Protection Society v Tauranga City Council [2021] NZHC 1201* referred to a Supreme Court judgment that found that 'practicable' must take its meaning from the context.[4] The High Court in *Tauranga* confirmed that cost is a factor in assessing 'practicability'.

1956. In this case, the relevant activity is not simply the provision of residential or commercial development that could theoretically occur elsewhere in Kapiti. The Project is a comprehensively planned mixed-use extension of the Paraparaumu Metropolitan Centre, comprising residential, retail, commercial and community activities together with the transport, three waters, open space and ecological infrastructure necessary to support that development.

1957. The Site is uniquely positioned for this purpose. It comprises the only remaining large, substantially undeveloped area within and adjoining the established Paraparaumu town centre, surrounded by existing urban development and strategically located between Kapiti Road, Arawhata Road, Ihakara Street and the Kapiti Expressway. In practical terms, development of the Site represents the 'filling of a gap' within the existing urban environment, rather than the outward expansion of Paraparaumu into a new greenfield location.

1958. The location of the Project is also fundamental to the benefits it will deliver. Development of the Site enables an increase in housing and business capacity immediately adjoining the Metropolitan Centre and in proximity to existing employment, retail and community services, the Paraparaumu railway station and existing public transport. It also enables new transport connections through the Site, including the Link Road between Kapiti Road/Arawhata Road and Ihakara Street and connections to Iver Trask Place and the surrounding street network.

1959. Relocating the Project elsewhere would therefore result in a materially different development and would not achieve the same integrated urban development outcomes. An alternative site elsewhere in the District would not fill this substantial undeveloped gap within the existing town centre, would not provide the same opportunity to integrate with and extend the Metropolitan Centre, and would not provide the same transport, accessibility and connectivity benefits.

1960. Further, the natural inland wetlands are dispersed extensively across the Site, rather than being confined to discrete areas that can simply be designed around. As a result, the Site cannot be practicably developed in a manner that gives effect to the planned urban form and Metropolitan Town Centre Structure Plan outcomes without reclamation of some wetlands. The reclamation sought through this application is therefore integral to enabling the development of the Site, including the proposed residential, commercial, transport and infrastructure components.

1961. The masterplanning process has sought to avoid and minimise wetland loss where practicable. However, given the extent and distribution of wetlands across the Site, complete avoidance would materially constrain the development footprint, sever connectivity between development areas and prevent the Site from being developed in the integrated manner anticipated by the Structure Plan.

1962. Accordingly, there is no practicable alternative location for the Project within the area of the development that would achieve its purpose and deliver the same combination of residential, commercial, transport, infrastructure and wider urban development benefits. The requirements of Regulation 45C(6)(b)(i) are therefore considered to be satisfied.

EFFECTS MANAGEMENT HIERARCHY

1963. Regulation 45C(6)(c) requires the consent authority to be satisfied that the effects management hierarchy has been applied. As outlined above, the practicability of avoiding and minimising wetland loss has been considered through the engineering and urban design avoidance assessments, having regard to the Site's physical constraints and the development outcomes anticipated for the Metropolitan Centre Zone.

[4] Wellington International Airport Ltd v New Zealand Air Line Pilots Assoc IUOW Inc [2017] NZSC 199, [2018] 1 NZLR 780

1964. The Proposal will result in the loss of approximately 5.33ha of natural inland wetlands, comprising nine predominantly exotic pastoral wetlands assessed as having low to moderate ecological values. The *Wetland Residual Effects Analysis* considers the management of these residual effects, including the suitability of aquatic offsetting and compensation.

1965. Aquatic offsetting was considered but determined not to be appropriate, as the proposed restoration would not provide a like-for-like replacement of the existing exotic wetland communities. Bioresearches considers that recreating these communities would deliver inferior ecological outcomes compared with establishing a diverse indigenous wetland complex. Accordingly, a 'trading up' compensation approach is proposed, involving the creation of approximately 5.44ha of indigenous wetland habitat within the Site, adjoining the Wharemaukū Stream.

1966. The proposed compensation has been assessed against the 13 principles of aquatic biodiversity compensation in Appendix 7 of the NPS-FM, as detailed in Table 6 of the Bioresearches report. In particular:

- Additionality: The proposed wetland creation, restoration and enhancement activities are additional to works that would otherwise be undertaken, funded or required, and would not occur in the absence of the Project.

- Ecological equivalence and trading up: While the compensation is not like-for-like, it will replace the wetland extent lost with a larger area of indigenous wetland habitat, providing greater vegetation diversity, habitat quality and ecological function. Bioresearches also considers that the affected wetlands are not irreplaceable or particularly vulnerable.

- Location and landscape context: The compensation will occur within the same Site, close to the affected wetlands, and will contribute to a larger interconnected wetland and riparian habitat network adjoining the Wharemaukū Stream.

- Time lags and uncertainty: The BCM incorporates allowances for time lags and uncertainty associated with wetland establishment. Bioresearches considers that the proposed restoration methods are well established, with herbaceous wetland vegetation expected to establish relatively quickly and longer-term development of shrub and tree habitats.

- Permanence and management: The proposed wetland will be subject to ongoing protection, planting, pest management, monitoring and adaptive management requirements, secured through the proposed *GWRC Consent Conditions*.

1967. The proposed compensation has been quantified using the Biodiversity Compensation Model (BCM), which predicts ecological gains exceeding the calculated impact score by 28.5%, above the recommended 10% minimum for a net positive outcome. Bioresearches concludes that the compensation will achieve no net loss of wetland extent and ecological values, together with a net positive outcome for wetland biodiversity.

1968. Overall, having regard to the avoidance assessments and the conclusions of Bioresearches, it is considered that the effects management hierarchy has been appropriately applied. The proposed compensation provides a quantified and managed response to the residual wetland loss, with the predicted ecological gains and proposed long-term management measures supporting the conclusion that Regulation 45C(6)(c) is satisfied.

REGULATION 45C SUMMARY

The assessment provided in the application and accompanying technical reports confirms that the Project:

- will contribute to a well-functioning urban environment; and

- will provide significant regional, or district benefits;

- there is no practicable alternative location for the activity within the area of the development; and,

- has applied the effects management hierarchy.

1969. Therefore, there are no impediments to the granting of consent under Regulation 45C.

13.8 REGIONAL POLICY STATEMENT FOR THE WELLINGTON REGION (RPS)

1970. A detailed assessment of the Proposal against the relevant objectives and policies of the RPS including Change 1, is provided in Table 7 of the *Statutory Assessment*. The key matters are summarised below:

- Integrated management: The Proposal adopts an integrated approach to urban development, infrastructure, freshwater management and ecological restoration, including through the proposed wetland and enhanced Wharemaukū Stream corridor.

- Urban development and regional form: The Proposal will provide approximately 600 dwellings and substantial commercial and retail development within the Metropolitan Centre Zone, supporting a compact urban form, housing capacity and improved transport connectivity.

- Natural inland wetlands: The Proposal will result in the loss of approximately 5.33ha of existing wetlands. Policy 40A is relevant, providing a pathway for considering wetland loss associated with urban development, subject to the applicable requirements and effects management hierarchy. The practicability of avoidance has been assessed, with on-site wetland compensation proposed to address residual effects. The Biodiversity Compensation Model identifies a net positive outcome.

- Freshwater and indigenous biodiversity: The Proposal includes enhancement of the Wharemaukū Stream, establishment of an indigenous wetland complex, riparian planting and ecological management measures. These will contribute to an interconnected network of freshwater habitats and open spaces.

- Coastal environment and natural character: The proposed dune removal and modification will result in adverse effects on existing landscape and natural character values. These effects, including the practicability of retaining the dunes and the proposed landscape response, are assessed separately in this Application.

- Climate change and natural hazards: The Proposal incorporates flood storage, stormwater attenuation and suitable development levels, with the supporting modelling demonstrating hydraulic neutrality. The compact mixed-use development and provision of active transport connections also support the RPS direction on climate change mitigation.

- Infrastructure and transport: The Proposal integrates infrastructure and transport provision with the proposed development, including new road, pedestrian and cycling connections. The development is designed to be infrastructure-ready without reliance on Council-funded off-site upgrades.

- Mana whenua and cultural values: Engagement with Te Ātiawa has informed the consideration of cultural effects associated with the Proposal, particularly in relation to the existing wetlands, dunes and Wharemaukū Stream. The proposed consent conditions provide for continued mana whenua involvement in the detailed design, implementation and monitoring of relevant ecological restoration and enhancement measures.

1971. Overall, the Proposal supports the RPS direction towards compact urban development, integrated infrastructure provision, climate resilience and freshwater restoration. The key policy considerations relate to the loss of existing wetlands and mana whenua. On balance, it is considered that Proposal to be generally consistent with the relevant objectives and policies of the RPS, while recognising the adverse effects on existing wetland values and cultural values.

13.9 NATURAL RESOURCES PLAN FOR THE WELLINGTON REGION (NRP)

1972. A detailed assessment of the Proposal against the relevant objectives and policies of the NRP is provided in **Table 4** of the *Statutory Assessment*. The key matters arising from that assessment are summarised below:

- **Integrated management of natural resources (Objectives O1–O4 and Policy P1):** The Proposal adopts an integrated approach to land development, freshwater management, stormwater, flood storage and ecological restoration. In particular, the proposed wetland complex, enhanced Wharemaukū Stream corridor and associated open-space network have been designed as interconnected components of the development.

- **Beneficial use and development (Objectives O7–O8 and Policies P6–P9):** The Proposal enables urban development while providing for the restoration and enhancement of freshwater environments and improved public access and recreational opportunities along the Wharemaukū Stream and through the Site.

- **Natural character (Objective O14 and Policy P24):** The Proposal will modify the existing environment, including through earthworks and the loss of existing wetlands. However, the proposed restoration and enhancement of the Wharemaukū Stream, establishment of a new wetland complex and associated indigenous planting will contribute to the natural character of the resulting freshwater environment.

- **Natural wetlands (Objective O22 and Policies P34, P35 and P110):** The Proposal will result in the loss of approximately 5.33ha of existing natural inland wetlands. Objective O22 seeks to protect the extent and significant values of natural wetlands and restore their condition, and Policy P110, directs the avoidance of wetland loss unless a specified exception applies. The Proposal relies on the applicable consenting pathway for urban development and the effects management hierarchy, supported by the wetland avoidance assessments and proposed on-site wetland compensation. The proposed wetland complex is intended to provide improved ecological values and functions, with the Biodiversity Compensation Model identifying a net positive outcome. Policy P35 also recognises the benefits of wetland restoration and the construction of wetlands for environmental purposes. The wetland loss, practicability of avoidance and proposed compensation measures are addressed in detail separately in this Application.

- **Indigenous biodiversity and freshwater ecology (Objectives O23 and O28 and Policies P32–P33 and P42–P44):** The Proposal includes measures to manage effects on freshwater habitats, indigenous fish and other ecological values. These include fish relocation, fish passage, riparian restoration, indigenous planting and ecological management and monitoring. The Wharemaukū Stream will be retained and enhanced, with measures proposed to manage effects on its ecological values.

- **Mana whenua values (Objectives O12–O13 and Policies P18–P21 and P47–P49):** The NRP recognises the relationship of mana whenua with freshwater environments, including the Wharemaukū Stream, which is identified in Schedule C as a site with significant mana whenua values.

- **Natural hazards and flood management (Objectives O15–O16 and Policies P25–P29):** The Proposal incorporates substantial flood management measures, including compensatory flood storage, stormwater attenuation and suitable development levels. The proposed works have been designed to achieve hydraulic neutrality and manage flood risk within and beyond the Site, including taking account of climate change.

- **Water quality, earthworks and stormwater (Objectives O17–O18, O34, O37–O38 and Policies P65–P66 and P83–P84):** Construction-related sediment and discharge effects will be managed through erosion and sediment control measures. Operational stormwater management incorporates treatment and attenuation measures, with the wider design reflecting water-sensitive urban design principles and seeking to protect downstream receiving environments.

- **Groundwater and dewatering (Objective O43 and Policies P132, P133 and P137):** The proposed groundwater take is temporary and associated with construction activities. The proposed bore and any associated groundwater management will be subject to measures to avoid adverse effects on surrounding land, structures and groundwater resources.

1973. Overall, the NRP assessment identifies the loss of existing natural inland wetlands as a key policy consideration, particularly under Objective O22 and Policy P110. The Proposal has been supported by specific technical assessments addressing the practicability of avoiding wetland loss, the application of the effects management hierarchy and the proposed compensation measures. More broadly, the Proposal incorporates substantial freshwater restoration, flood management and stormwater treatment measures that respond to the integrated management, water quality and ecological outcomes sought by the NRP.

13.10 KAPITI COAST OPERATIVE DISTRICT PLAN

13.10.1 OBJECTIVES AND POLICIES

1974. A detailed assessment of the proposal against the relevant objectives and policies of the Kapiti Coast District Plan is provided in Table 2 of the *Statutory Assessment*. Overall, the Project is considered to be generally consistent with the relevant policy direction for the following reasons:

- **Mana whenua and cultural values:** Engagement has been undertaken with Te Ātiawa ki Whakarongotai in relation to the Project, including the proposed modification of the dune landforms, wetlands and Wharemaukū Stream. The Project has implications for cultural values associated with these features, which are considered separately in this Application. The proposed consent conditions also provide opportunities for ongoing mana whenua involvement in ecological restoration and management.

- **Metropolitan Centre Zone and urban development:** The Project provides for the comprehensive development of Precinct C as an integrated extension of the Paraparaumu Sub-Regional Centre, consistent with MCZ-P1, MCZ-P2 and MCZ-P6–P10. The proposed mix of residential, retail and commercial activities, supported by public open space and infrastructure, responds to the intended role and function of the Metropolitan Centre and the development outcomes anticipated by the Structure Plan.

- **Housing and economic development:** The Project will deliver approximately 600 dwellings across a range of typologies, together with large format retail and other commercial activities. This will increase housing choice and development capacity, support the growth and vitality of the Paraparaumu Sub-Regional Centre and contribute to the District's economic wellbeing, consistent with DO-O12, DO-O15, DO-O16 and the relevant MCZ policies.

- **Urban form and design:** As outlined in the *Urban Design Assessment* and *Architectural Design Statement*, the Project establishes a compact and integrated urban environment comprising distinct residential and mixed-use precincts, a connected street network and a hierarchy of public spaces. The distribution of building typologies and densities responds to the intended function of Precinct C and provides for a high-quality relationship between buildings, streets and open spaces.

- **Transport and connectivity:** The proposed Link Road, Iver Trask Place extension and wider internal street network will improve connectivity through the Site and with the surrounding town centre. The development incorporates pedestrian and cycling connections, provision for public transport and an integrated network of streets and public spaces, consistent with MCZ-P9 and the relevant transport objectives and policies.

- **Ecology and biodiversity:** While the Project will result in the loss of existing natural inland wetlands, it incorporates an ecological compensation and restoration package, including a new indigenous wetland complex, enhancement of the Wharemaukū Stream corridor and extensive indigenous planting.

- **Landscape, natural character and dunes:** The proposal will modify the existing dune landforms, resulting in adverse effects on their landscape and natural character values. The practicability of retaining the dunes has been considered alongside the engineering requirements and urban development outcomes anticipated for the Site. The proposed landscape response includes a new landform along the Kapiti Expressway boundary, indigenous planting and an integrated network of open spaces and restored habitats. These matters are assessed further below, particularly in relation to CE-P3, CE-P4 and CE-P7, while the effects of dune removal on cultural values are addressed separately in this Application.

- **Open space and amenity:** The proposal provides a connected network of public open spaces, recreational areas, pedestrian and cycling routes and landscaped corridors associated with the Wharemaukū Stream and proposed wetland. These features will improve public access and recreational opportunities within a Site that currently has limited formal public access, consistent with the relevant open space, amenity and community objectives and policies.

- **Infrastructure and servicing:** The project is an 'infrastructure-ready' development, with all necessary water supply, wastewater, stormwater, transport and other servicing infrastructure incorporated into the Proposal. Importantly, the development does not rely on off-site KCDC infrastructure upgrades to proceed, with the required infrastructure to be delivered or funded by the Applicant rather than relying on ratepayer-funded upgrades. This approach supports the efficient and timely delivery of development within the Metropolitan Centre Zone while avoiding additional infrastructure funding demands on KCDC or the community.

- **Natural hazards:** The proposal incorporates substantial flood management measures, including a dedicated flood storage area adjoining the Wharemaukū Stream, stormwater attenuation and the establishment of suitable development levels. The *Flood Risk Assessment* confirms that the proposed works will provide equivalent compensatory flood storage and achieve hydraulic neutrality, avoiding increased flood risk to surrounding properties and downstream areas. Climate change has also been accounted for in the flood modelling and design.

1975. Overall, the Project will enable the comprehensive development of land specifically identified for the expansion of the Paraparaumu Metropolitan Centre. While some existing environmental features will be modified or removed, the Project incorporates measures to manage those effects alongside the delivery of the urban development, infrastructure, open space and ecological outcomes anticipated by the District Plan. The particular issues associated with dune modification and alignment with the Metropolitan Centre Zone Structure Plan are considered further below.

13.10.2 ALIGNMENT WITH THE METROPOLITIAN CENTRE ZONE STRUCTURE PLAN AND ASSOCIATED POLICIES

1976. The MCZ Structure Plan in Appendix 19 provides the framework for the development of Precinct C, including the anticipated land uses, road connections, stormwater management areas, open spaces and dune protection area. MCZ-P1 and MCZ-P2 seek to enable the comprehensive development of Precinct C in a manner that reinforces the role and function of the Paraparaumu Sub-Regional Centre, including through a mix of commercial and residential activities, improved connectivity and integrated stormwater management.

1977. The Proposal has been developed having regard to the Structure Plan and generally provides for the principal land use, transport, stormwater and open-space outcomes anticipated for Precinct C. The detailed layout has been refined through the masterplanning process to respond to the Site's physical constraints, infrastructure requirements and the proposed mix of activities.

1978. The *Landscape and Visual Effects Assessment* states the following with respect to alignment with the Structure Plan:

> *The proposal generally reflects the outcomes sought by the Metropolitan Centre Zone Structure Plan through an integrated mix of residential, commercial and retail development supported by a connected road, pedestrian, cycling and open-space network. The layout provides stormwater management areas, wetlands, recreational spaces and connections along Wharemaukū Stream,*

contributing to ecological, amenity and recreational values. The proposal also establishes links through the site and to the surrounding Town Centre.

The dune system will be modified. A realigned landform extending from the former southern extent of the western dune along the Kapiti Expressway boundary will provide an identifiable landscape element and buffer along the Expressway edge and will incorporate native planting as part of the wider landscape response.

Overall, the proposal is considered to generally align with the intended land use, movement, open-space, stormwater and landscape framework established by the Structure Plan. The Structure Plan expressly anticipates that development may adapt over time, while the relevant provisions recognise that effects on the dune system are to be avoided to the extent practicable having regard to the development outcomes anticipated for Precinct C. The proposal responds to this framework while recognising that some existing landscape elements, particularly the dune landforms, will be modified to enable the comprehensive development of the site.

1979. In terms of the proposed road network, the principal internal roads generally follow the alignments anticipated by the MCZ Structure Plan, providing connections between Kapiti Road, Ihakara Street and the wider Metropolitan Centre. The detailed road layout has been refined to accommodate the proposed development configuration, intersection requirements, stormwater management areas and pedestrian and cycling connections. These refinements do not materially alter the overall connectivity outcomes anticipated by the MCZ Structure Plan.

1980. The MCZ Structure Plan also anticipates the extension of Ihakara Street through to the Airport. As noted, separate discussions are being progressed with NZTA regarding delivery of this connection, generally following the alignment identified in the MCZ Structure Plan that is predominantly within NZTA-owned land. While this extension forms part of a separate workstream, the Proposal has been designed to accommodate the anticipated connection and does not preclude its future delivery.

1981. The proposed modification of the existing dune landforms represents a departure from the dune protection area identified in the Structure Plan. However, as discussed separately below, MCZ-P2(3)(d) and MCZ-R15 expressly contemplate the potential modification of the dunes, having regard to the development outcomes anticipated for Precinct C and the management of resulting effects. Accordingly, the dune modification needs to be considered within that specific policy framework rather than as a departure from the Structure Plan in isolation.

STORMWATER, FLOOD MANAGEMENT AND WETLAND RESTORATION

1982. The proposal closely aligns with the Structure Plan in relation to stormwater and flood management, with the proposed wetland restoration and flood management area located adjoining the Wharemaukū Stream, in the same general location identified on the MCZ Structure Plan.

1983. This approach is expressly anticipated by MCZ-P1, which provides for consolidated stormwater management areas and, where practicable, wetlands that contribute to flood storage, ecological and amenity values. MCZ-P2(3) similarly seeks stormwater management that also supports ecological and recreational values where practicable.

1984. The proposed wetland and flood management area will adjoin the Wharemaukū Stream, which is itself proposed to be enhanced. Together with the central swale, indigenous planting and open-space connections, these areas will form an interconnected network of ecological, landscape and recreational spaces across the Site. This represents a strong alignment with both the location and integrated outcomes anticipated by the MCZ Structure Plan.

BUILDING DESIGN AND DEVELOPMENT STANDARDS

1985. The proposal includes a number of infringements of the permitted activity standards applying to buildings and residential activities within the Metropolitan Centre Zone. These are identified in the rules assessment in **Table 1** of the *Statutory Assessment* and addressed in detail in the *Urban Design Assessment*.

1986. As outlined in the *Urban Design Assessment*, the residential and mixed-use development has been organised into three distinct design precincts, being the Hill Precinct, Wetland Precinct and Town Centre Precinct. Each has a different built form and design response, reflecting its intended function and relationship with the surrounding streets, activities and landscape features.

1987. The Town Centre Precinct accommodates the more intensive mixed-use and apartment development, including taller buildings and a greater concentration of activity around the principal streets. The Hill and Wetland Precincts provide predominantly residential environments, with a range of housing typologies arranged to respond to the proposed landforms, open spaces and wetland areas.

1988. This distinction is relevant to the assessment of the permitted activity standards. For example, MCZ-R5 anticipates residential activities within developments containing commercial activities being located above ground-floor level or separated from street frontages by commercial activities. While the Proposal is being considered as a comprehensive mixed-use development, the Hill and Wetland Precincts are intended to function as residential neighbourhoods rather than extensions of the commercial core. Requiring continuous ground-floor commercial activity throughout these areas would not necessarily be consistent with their intended function or result in a better urban design outcome.

1989. Other infringements relate to building height, height in relation to boundary, building coverage, setbacks, outdoor living space and various building design requirements. These largely arise from the proposed building typologies and the comprehensive approach to the design of the development. In particular, the taller buildings within the Town Centre Precinct are intended to reinforce the more intensive mixed-use environment, while the residential typologies within the Hill and Wetland Precincts respond to their respective landscape settings and residential functions.

1990. The *Urban Design Assessment* provides the design rationale for these departures, including consideration of the proposed building forms, street interfaces, residential amenity and relationship between different activities. While the permitted activity standards provide a starting point for assessing development within the Zone, the relevant objectives and policies also anticipate substantial intensification, a range of residential and commercial activities and an integrated urban form.

1991. Based on the assessments undertaken by Urban Acumen, it is considered that the identified building infringements do not undermine the overall alignment of the Proposal with the Metropolitan Centre Zone objectives and policies. The development has been designed as a comprehensive masterplan, with a deliberate distribution of building heights, densities and activities across the Site. This approach supports the outcomes sought by MCZ-P1, MCZ-P2 and the associated policies relating to housing, intensification, urban design and connectivity.

1992. Overall, it is considered that the Proposal is generally consistent with the MCZ Structure Plan and associated objectives and policies. It provides for the principal road connections in generally the anticipated alignments, does not preclude the future Ihakara Street extension, establishes a mix of residential and commercial activities and incorporates the stormwater management and open-space network anticipated for Precinct C. While the Proposal does not replicate every element of the MCZ Structure Plan or achieve full compliance with all building standards, these departures have been considered through the supporting technical assessments and, in my opinion, do not detract from the overall development outcomes anticipated for the Metropolitan Centre.

DUNE REMOVAL

1993. The proposed removal and modification of the existing dune landforms requires particular consideration under the District Plan, which contains both general provisions relating to the protection of dunes within the coastal environment and specific provisions addressing the 'dune protection area' notated on MCZ Structure Plan.

1994. The District Plan identifies a relatively extensive Coastal Environment, which extends across substantial parts of the Kapiti Coast's existing and planned urban areas. Its extent is not limited to the immediate coastal margin, but includes much of the lower-lying coastal plain, including the Site and surrounding Metropolitan Centre Zone. Refer Figure 15 below that shows the extent of mapped Coastal Environment relevant to Paraparaumu. Accordingly, the coastal environment provisions apply across a range of

environments, including established urban areas and locations where the District Plan expressly anticipates further development.

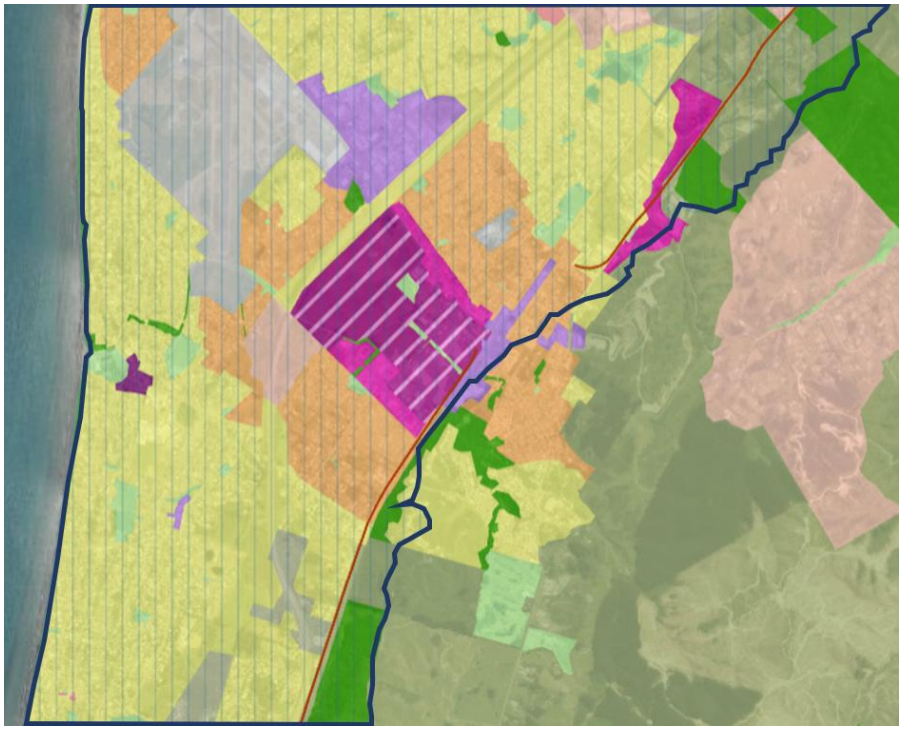


FIGURE 15: EXTENT OF COASTAL ENVIRONMENT AT PARAPARAUMU (SITE – PINK MCZ ZONE)

1995. The principal coastal environment provisions relevant to dune removal are DO-O4, CE-P3, CE-P4 and CE-P7. In particular:

- DO-O4(5) seeks to ensure that inappropriate development does not result in further loss of coastal dunes within the mapped Coastal Environment.
- CE-P3 seeks to preserve natural character within the coastal environment and protect it from inappropriate subdivision, use and development. This includes avoiding significant adverse effects on natural character outside areas of outstanding natural character, and avoiding, remedying or mitigating other adverse effects. CE-P3(3) also provides for reinstating dunes that function as natural buffers where practicable.
- CE-P4 promotes restoration of natural character where practicable, including through the creation and enhancement of indigenous habitats, rehabilitation of dunes and other natural coastal features, and restoration and protection of riparian margins.
- CE-P7 that states that *"Natural dune systems will be protected and enhanced (including through restoration) and natural dune function will be enabled where practicable."*

1996. These provisions establish a policy direction towards the protection and enhancement of coastal dunes and natural character. The proposed removal and modification of the existing dunes will result in the loss of existing landscape and natural character values and therefore gives rise to tension with this policy direction, particularly CE-P7. However, DO-O4 and CE-P3 are expressly concerned with inappropriate development, and their application needs to be considered in the context of the Site's existing environment, its MCZ zoning and the more specific provisions applying to the dune system within Precinct C.

1997. Of particular relevance is MCZ-P2(3)(d), which specifically addresses the dune system within Precinct C and requires that:

"adverse effects on the landscape and amenity values of the dune system will be avoided to the extent practicable having regard to the development outcomes provided for in Precinct C and, where adverse effects cannot be avoided, they will be mitigated or offset by environmental enhancements within Precinct C that are commensurate with the scale of the adverse effects."

1998. Importantly, MCZ-P2(3)(d) does not require the absolute retention of the existing dune landforms. Rather, it expressly qualifies the requirement to avoid adverse effects on landscape and amenity values by reference to what is practicable, having regard to the development outcomes anticipated for Precinct C. Where avoidance is not practicable, the policy provides for mitigation or offsetting through environmental enhancements within the Precinct that are commensurate with the scale of those effects.

1999. This qualification needs to be read in the context of MCZ-P2 as a whole, which anticipates Precinct C accommodating development that reinforces the sub-regional status, vitality and functioning of the Metropolitan Centre. In particular, the policy provides for improved transport connections between precincts, commercial and residential activities, higher-density housing and stormwater management infrastructure.

2000. The District Plan manages development within the Dune Protection Area identified in the MCZ Structure Plan through Rule MCZ-R15. This rule provides for earthworks, new buildings and structures, and additions and alterations to existing buildings and structures as restricted discretionary activities, subject to buildings, structures and activities complying with the relevant MCZ rules and standards. While the Proposal triggers discretionary activity status due to non-compliance with some of those standards, the underlying rule framework is important. Rather than prohibiting development or requiring the complete retention of the dunes, MCZ-R15 provides for earthworks and built development within the Dune Protection Area as a restricted discretionary activity, subject to assessment of their effects.

2001. The matters of discretion under MCZ-R15 expressly provide for consideration of, among other things:

- *The extent to which earthworks are necessary to facilitate the efficient development of land within Precinct C;*
- *Effects on the pattern of development within Precinct C, including benefits associated with efficient development of the land;*
- *Measures to mitigate or offset adverse effects on landscape and amenity values;*
- *The profile and surface treatment of excavated or filled areas and their integration with the natural landform; and*
- *The layout of roads, walking and cycling routes, infrastructure services and stormwater management areas.*

2002. The wording of both the rule and its matters of discretion demonstrates that the District Plan does not contemplate absolute protection of the existing dune landforms in the Metropolitan Centre Zone. Rather, it establishes a framework for assessing dune modification in the context of the wider development outcomes anticipated for Precinct C, consistent with the approach set out in MCZ-P2(3)(d). The practicability of retaining the dunes should therefore be assessed in the context of the development anticipated for the Site, rather than simply whether the landforms could physically remain in place.

2003. The engineering and urban design avoidance assessments have considered these matters in detail (refer appendices 5 and 16A). The Envelope assessment identifies the relationship between the existing dunes, ground conditions, the earthworks required to establish suitable development levels, the proposed road network and the management of unsuitable material. The Urban Acumen assessment identifies the implications of dune retention for the proposed urban structure, including the continuity of the street network, development capacity, the arrangement of residential and commercial activities and the ability to establish a connected and coherent neighbourhood.

2004. While alternative development configurations could enable some or all of the dunes to be retained, the assessments identify that this would have wider consequences for the transport network, earthworks, infrastructure requirements and urban design outcomes. These are directly relevant to the assessment required by MCZ-P2(3)(d) and the matters of discretion under MCZ-R15. The question is therefore not

simply whether the dunes could be retained, but whether their retention is practicable having regard to the development outcomes expressly provided for within Precinct C.

2005. Where adverse effects cannot practicably be avoided, MCZ-P2(3)(d) requires mitigation or offsetting through environmental enhancements within Precinct C that are commensurate with the scale of those effects. The proposed landscape response includes the establishment of a new landform along the Kapiti Expressway boundary, indigenous planting and an interconnected network of open spaces, wetlands and enhancement of the Wharemauku Stream. As outlined in the *Landscape and Visual Effects Assessment*, these measures will change the existing landscape character of the Site, while establishing a more extensive and integrated landscape framework within the developed Metropolitan Centre.

2006. The new landform is not a direct replacement for the existing dunes, and their removal and modification will result in the loss of existing landscape and natural character values. Nevertheless, the proposed environmental enhancements are relevant to the mitigation and offsetting pathway expressly contemplated by MCZ-P2(3)(d), as well as CE-P4 and the matters of discretion under MCZ-R15 concerning landscape treatment and the integration of modified landforms. The extent to which those enhancements are commensurate with the residual landscape and amenity effects is informed by the *Landscape and Visual Effects Assessment*.

2007. In relation to CE-P3, the existing dunes are located within an urban environment that has been modified by surrounding development and the Kapiti Expressway. Nevertheless, they remain identifiable natural landforms, and their removal and modification will result in adverse effects on existing natural character values. The *Landscape and Visual Effects Assessment* provides the technical basis for considering those effects and the proposed landscape response. The direction under CE-P3(2) to avoid significant adverse effects on natural character, where applicable, must also be considered separately from the more flexible approach to landscape and amenity effects under MCZ-P2(3)(d).

2008. In relation to CE-P7, the proposed dune modification will not achieve the retention and protection of the existing natural dune system. This represents a departure from the general direction of that policy. However, CE-P7 needs to be considered alongside MCZ-P2(3)(d) and MCZ-R15, which provide specific direction for managing adverse effects on the dune system within Precinct C. These provisions expressly recognise that dune retention must be considered in the context of the development outcomes anticipated for the Metropolitan Centre, including efficient land development, transport connections and infrastructure requirements. They do not remove the need to assess effects under CE-P7, but provide important context for evaluating the overall consistency of the Proposal with the District Plan.

2009. The effects of dune removal on cultural values are a separate consideration and are not necessarily addressed by the landscape enhancements proposed under MCZ-P2(3)(d). Those effects are considered separately in this Application.

2010. Overall, the proposed dune removal and modification will result in adverse effects on existing landscape and natural character values and does not fully achieve the general direction of the coastal environment provisions towards protecting and enhancing natural dune systems. However, the District Plan also specifically anticipates development within the Dune Protection Area and provides a framework for considering the practicability of avoiding adverse effects on the dunes, having regard to the development outcomes anticipated for Precinct C. it is considered that the the engineering and urban design avoidance assessments demonstrate that full retention of the dunes would materially compromise those outcomes, while the proposed landscape enhancements provide a response to the landscape and amenity effects consistent with the approach contemplated by MCZ-P2(3)(d) and MCZ-R15.

2011. On balance, it is considered that the Proposal can be supported under the specific management framework established for Precinct C, notwithstanding the tension with the broader coastal environment provisions. Of particular significance is that MCZ-R15 expressly provides for earthworks and built development within the Dune Protection Area as restricted discretionary activities, rather than non-complying or prohibited activities. This, together with the express practicability qualification in MCZ-P2(3)(d), demonstrates that the District Plan anticipates the potential modification of the dunes where justified in the context of the development outcomes provided for within Precinct C, subject to appropriate management of the resulting effects.

SUMMARY OF ALIGNMENT WITH MCZ STRUCTURE PLAN

2012. Overall, the Proposal is considered to be generally consistent with the objectives and policies of the Metropolitan Centre Zone for the following reasons:

- The Proposal will reinforce the role and function of the Paraparaumu Metropolitan Centre through a substantial mix of residential, commercial and retail activities.
- The Proposal generally achieves the anticipated land use, transport, stormwater and open-space outcomes for Precinct C.
- The proposed wetland compensation, stream enhancement, flood management and open-space network will provide interconnected ecological, landscape and recreational benefits.
- The proposed built form and distribution of activities support the intensification and mixed-use outcomes anticipated by the Zone, notwithstanding identified development standard infringements.
- While the removal and modification of the dunes creates tension with the coastal environment provisions, the specific framework under MCZ-P2(3)(d) and MCZ-R15 recognises that dune modification may be appropriate where retention is not practicable having regard to the development outcomes anticipated for Precinct C.

2013. On balance, the Proposal is considered to strongly align with and deliver the key development outcomes anticipated for Precinct C, including a comprehensive mix of residential and commercial activities, improved transport connectivity, integrated stormwater and flood management, and an interconnected network of open spaces and ecological enhancements. The proposed development gives effect to the overall intent of the Metropolitan Centre Zone Structure Plan, with the detailed design responding to the Site's physical constraints and the specific policy framework applying to dune modification.

14. FTAA STATUTORY ASSESSMENT

14.1 SECTION 81 AND CLAUSE 17(1) OF SCHEDULE 5

2014. Section 81(3)(a) of the FTAA directs the decision maker to consider Clauses 17-22 of Schedule 5 for resource consent approvals. Clause 17(1) of Schedule 5 of the FTAA sets out criteria and other matters for assessment of consent applications as follows:

> *(1) For the purposes of section 81, when considering a consent application, including conditions in accordance with clauses 18 and 19, the panel must take into account, giving the greatest weight to paragraph (a),—*
>
> *(a) the purpose of this Act; and*
>
> *(b) the provisions of Parts 2, 3, 6, and 8 to 10 of the Resource Management Act 1991 that direct decision making on an application for a resource consent (but excluding section 104D of that Act); and*
>
> *(c) the relevant provisions of any other legislation that directs decision making under the Resource Management Act 1991.*

2015. The following assessment addresses each of these matters, drawing on the assessment of environmental effects, statutory assessment and technical reports accompanying the application. Particular emphasis is placed on the purpose of the FTAA, reflecting the weighting expressly required by clause 17(1).

14.1.1 CLAUSE 17(1)(A) – PURPOSE OF THE FTAA

2016. Section 3 of the FTAA establishes its purpose as follows:

> *"The purpose of this Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits."*

2017. The purpose of the FTAA is the primary consideration under clause 17(1). Accordingly, the assessment below considers the nature, scale and significance of the benefits arising from the Project, including its contribution to housing supply, economic development, employment, infrastructure, transport connectivity, environmental restoration and the long-term development of the Paraparaumu Metropolitan Centre.

2018. The Project represents a substantial investment in the comprehensive development of approximately 36ha of strategically located land within the Metropolitan Centre Zone. The Site is identified for urban development through the District Plan and associated MCZ Structure Plan, but remains largely undeveloped. The Project provides an opportunity to realise the planned development potential of this land through an integrated approach to residential, commercial and retail development, transport infrastructure, servicing, flood management, ecological restoration and open space.

2019. The significance of the Project is not limited to the scale of the proposed development. Its location immediately adjoining the existing Paraparaumu town centre means that the benefits will contribute directly to the growth, accessibility and functioning of the District's principal commercial centre, while also addressing identified housing capacity constraints and providing infrastructure and transport connections that support the wider urban area.

HOUSING SUPPLY AND CHOICE

2020. The Project will deliver approximately 593 new residential dwellings, comprising 219 apartments, 186 townhouses, 135 standalone dwellings, 32 duplexes and 21 courtyard homes. This represents a substantial addition to the District's housing supply and will provide a range of housing types and sizes to accommodate different household needs, preferences and circumstances.

2021. The *Economic Assessment* identifies that the Kapiti Coast housing market is experiencing increasing demand for more diverse housing typologies, including smaller dwellings and more intensive residential development. The proposed mix responds to this demand by providing a range of housing options within a single comprehensively planned development.

2022. The *Economic Assessment* also identifies constraints on the availability of greenfield housing capacity within the District. Based on an estimated annual demand of approximately 236 dwellings, including the NPS-UD medium-term demand buffer, existing and pipeline greenfield capacity is estimated to provide approximately 6.2 years of supply. The addition of the Project would increase this to approximately 8.7 years.

2023. KCDC has also expressed support for the proposed residential development in its letter dated 22 October 2026 and provided in Appendix 40. The Council identifies that the District is forecast to accommodate more than 22,000 additional residents over the next 30 years and states:

> *"Council supports the medium / high density development proposed, particularly given its location within the metropolitan centre zone, and proximity to key employment areas and public transport infrastructure."*

2024. The Council's support reinforces the importance of delivering additional housing capacity in this location, particularly given its proximity to existing employment, services and public transport, and the role of the Metropolitan Centre in accommodating future growth.

2025. The Project will therefore make a material contribution towards addressing the identified housing capacity shortfall. This is particularly important given the scale of the development, its location within an established

urban centre and the ability to deliver a range of housing typologies alongside the necessary infrastructure and supporting services.

2026. The *Economic Assessment* also identifies potential housing affordability benefits. The proposed dwellings are expected to have an average sale price of approximately $810,000, compared with approximately $930,000 for recently constructed dwellings across the District. While the Project is not proposed as an affordable housing development, its dwelling mix and anticipated price positioning will broaden the range of new-build housing options available within the local market.

2027. The additional housing supply will also support the continued growth and functioning of the Paraparaumu Metropolitan Centre. The concentration of new residents within walking and cycling distance of existing and proposed employment, retail, commercial and community facilities will increase the population supporting these activities and contribute to the vitality of the wider town centre.

2028. Overall, the housing component represents a significant district and regional benefit through its contribution to housing supply, housing choice, market competition and the more efficient use of land already identified for urban development.

ECONOMIC DEVELOPMENT AND EMPLOYMENT

2029. The Project will deliver substantial economic benefits through both its construction and ongoing operation. The *Economic Assessment* identifies an estimated total development investment of approximately $527.5 million.

2030. During construction, the Project is estimated to generate approximately $160.2 million in direct GDP and support approximately 1,000 full-time equivalent jobs. When indirect supply-chain effects are included, the estimated economic contribution increases to approximately $313.3 million in GDP and 1,765 full-time equivalent jobs.

2031. These benefits will arise across a range of industries, including construction, engineering, professional services, transport, materials supply and other activities supporting the delivery of the development. Given the scale and anticipated staging of the Project, the construction programme will provide sustained economic activity and employment opportunities over an extended period.

2032. Once operational, the retail and commercial components are estimated to contribute approximately $48.8 million in GDP annually. The Project will also support ongoing employment within the proposed retail, commercial and service activities, together with indirect economic benefits arising from increased household expenditure and activity within the wider town centre.

2033. The economic benefits are particularly relevant in the context of the Project's location. Rather than establishing a separate commercial centre, the Proposal will extend and strengthen the existing Paraparaumu Metropolitan Centre, supporting the concentration of business activity in a location already identified for that purpose.

2034. The Project will also provide a substantial increase in the District's rating base and generate additional economic activity through the occupation of new dwellings and the establishment of commercial and retail activities. While these benefits have not all been separately quantified, they form part of the wider economic contribution associated with the development.

2035. Overall, the scale of investment, construction activity, employment generation and ongoing economic contribution represents a significant benefit to the Kapiti Coast District and wider Wellington Region.

RETAIL AND COMMERCIAL DEVELOPMENT

2036. The Project includes approximately 20,000m² of large format retail floorspace and 3,800m² of other retail and commercial floorspace, including specialty retail and associated commercial activities.

2037. The *Economic Assessment* identifies an existing undersupply of large format retail floorspace within the District of approximately 6,600m², with demand expected to increase over the medium to long term. The

proposed retail provision is considered broadly aligned with this demand trajectory, having regard to the scale of anticipated growth and typical development lead times.

2038. The Project will broaden the range of retail and commercial activities available within Paraparaumu, including opportunities for businesses that may not presently be accommodated within the existing town centre. This will improve consumer choice, support local employment and assist in reducing expenditure leakage to other centres.

2039. The location of the proposed retail and commercial activities is an important aspect of these benefits. The Project will provide an integrated extension of the existing Metropolitan Centre, rather than dispersing commercial activity to an alternative location. This supports the role and function of Paraparaumu as the District's principal centre and provides opportunities for agglomeration benefits through the concentration of complementary activities.

2040. The integration of retail and commercial activities with the proposed residential development will also enable residents to access a greater range of employment, goods and services within or close to the Site, supporting the establishment of a well-functioning urban environment.

2041. The commercial component therefore provides significant economic and urban development benefits, both in its own right and through its contribution to the wider functioning and growth of the Paraparaumu Metropolitan Centre.

EFFICIENT USE OF URBAN LAND AND INFRASTRUCTURE

2042. A further important benefit of the Project is the efficient use of a large, strategically located site that is already zoned and planned for comprehensive urban development.

2043. The Site is situated between Kapiti Road, Arawhata Road, Ihakara Street and the Kapiti Expressway, immediately adjoining the existing Metropolitan Centre. Its development represents the completion of a substantial undeveloped area within the existing urban environment, rather than the outward expansion of Paraparaumu into a new growth area.

2044. The Metropolitan Centre Zone and associated Structure Plan have long anticipated the comprehensive development of Precinct C, including residential and commercial activities, new transport connections, stormwater management, open space and associated infrastructure. The Project will give effect to many of these anticipated development outcomes through a coordinated masterplanned approach.

2045. The comprehensive nature of the Proposal is particularly important. The development has been planned as an integrated urban environment, with the location and configuration of residential and commercial activities considered alongside transport, three waters infrastructure, flood management, ecological restoration and open space.

2046. This approach enables infrastructure and development to be delivered in a coordinated manner, rather than through fragmented development of individual land parcels. It also provides opportunities to establish an integrated street network, manage stormwater and flood risk comprehensively, and provide open space and ecological restoration at a scale that would be difficult to achieve through separate developments.

2047. The supporting infrastructure assessments demonstrate that the Project can be serviced through existing network capacity and infrastructure delivered or funded as part of the development, subject to the identified detailed design and staging requirements. This will enable substantial additional housing and business capacity without relying on major Council-funded off-site infrastructure upgrades as a prerequisite to development.

2048. The Project therefore represents an efficient use of land and infrastructure already identified for urban development and provides greater certainty around the coordinated delivery of housing, commercial activities and supporting infrastructure.

TRANSPORT CONNECTIVITY AND ACCESSIBILITY

2049. The Project will deliver significant improvements to transport connectivity through this part of Paraparaumu, including the establishment of the new Town Centre Link Road connecting Kapiti Road/Arawhata Road with Ihakara Street.

2050. The Link Road will provide an additional connection through a substantial area of land that presently has limited public accessibility. It will serve the proposed development while also contributing to the wider movement network by improving connectivity between the surrounding streets and providing an alternative route through this part of the Metropolitan Centre.

2051. The strategic importance of the Link Road is also recognised by KCDC in its letter of support. Council confirms that the Link Road has been identified in the Regional Land Transport Plan since 2015 and describes it as:

> *"a critical piece of infrastructure to support wider growth in the area."*

2052. Council also confirms that it is separately progressing an agreement with the developer to co-fund the earthworks and construction of the Link Road. While detailed design matters remain under discussion, Council's recognition of the Link Road's strategic importance and proposed financial contribution demonstrate the wider transport and growth benefits associated with its delivery.

2053. The Proposal also incorporates the extension of Iver Trask Place, connections to Brett Ambler Way and an integrated internal street network. These connections will improve access between the proposed residential, retail and commercial areas and the wider Paraparaumu urban environment.

2054. Pedestrian and cycling infrastructure forms an important component of the transport network. The Proposal incorporates dedicated cycling facilities, shared paths, footpaths and pedestrian connections throughout the development, including connections to surrounding streets, public open spaces and the Wharemaukū Stream corridor.

2055. The Site is also located close to the Paraparaumu railway station and existing bus services. The proposed Link Road has been designed to accommodate future bus services should the public transport network be extended through the development.

2056. The concentration of additional housing, employment, retail and services within an accessible urban location, together with the proposed active transport network, will provide opportunities for residents, workers and visitors to undertake a greater proportion of trips by walking, cycling and public transport.

2057. These improvements represent benefits extending beyond the development itself. The new connections will increase permeability through the Site, improve accessibility to the Metropolitan Centre and support the longer-term development of a more connected urban transport network.

FLOOD MANAGEMENT AND CLIMATE RESILIENCE

2058. The Project will deliver flood management infrastructure as part of the comprehensive development of the Site. This is particularly important given the Site's existing flood storage and conveyance functions within the wider Wharemaukū Stream catchment.

2059. The proposed earthworks, drainage infrastructure, development platforms, flood conveyance corridors and wetland complex have been designed together to manage flood risk while enabling urban development.

2060. The *Flood Risk Assessment* identifies that the Proposal will provide approximately 26,000m³ of additional flood storage during the 1% AEP event. This additional storage will be provided principally through the proposed wetland and flood management areas adjoining the Wharemaukū Stream.

2061. The flood modelling indicates that flood levels and flows on surrounding land will generally be maintained or reduced, with no material change in off-site flood hazard classifications. Further modelling and detailed design requirements are proposed through the consent conditions to confirm these outcomes and address identified localised effects.

2062. The flood management system has also been assessed having regard to future climate change scenarios extending to 2130. Higher flood hazard areas are largely accommodated within the proposed wetland and flood management areas, while the proposed residential and commercial development will be established on appropriately designed building platforms.

2063. The Project therefore provides an integrated response to flood management that will improve the resilience of the developed Site and provide additional flood storage within the wider catchment.

2064. The incorporation of flood storage, stormwater attenuation, water-sensitive urban design and defined flood conveyance corridors also demonstrates the benefits of coordinating infrastructure and land development at a comprehensive scale.

ECOLOGICAL RESTORATION AND ENHANCEMENT

2065. While the Project will result in the permanent loss of approximately 5.33 ha of natural inland wetlands, representing a significant adverse ecological effect, the Project also incorporates ecological restoration and enhancement, including the establishment of an indigenous wetland complex as biodiversity compensation for that loss, enhancement of the Wharemaukū Stream corridor, extensive indigenous planting and management measures for indigenous fauna.

2066. The proposed wetland complex will comprise approximately 5.44ha of indigenous wetland habitat, incorporating a range of shallow water, marsh, swamp and seasonally inundated habitats. It will adjoin the Wharemaukū Stream and form part of a wider network of indigenous wetland, riparian and terrestrial habitats.

2067. The wetland complex is principally proposed as biodiversity compensation for the loss of approximately 5.33ha of existing natural inland wetlands. The *Wetland Residual Effects Analysis* predicts that the proposed compensation will achieve no net loss of wetland extent and a net positive outcome for wetland biodiversity values, subject to successful establishment and ongoing management.

2068. The Biodiversity Compensation Model identifies predicted ecological gains exceeding the calculated impact score by approximately 28.5%, above the recommended 10% minimum for a net positive outcome.

2069. The Proposal will also enhance the Wharemaukū Stream corridor through indigenous riparian planting and habitat improvements, while retaining the Stream on its existing alignment and maintaining upstream and downstream connectivity.

2070. Extensive indigenous planting is proposed throughout the development, including within the wetland margins, stream corridor, open space areas and new western landform. These measures will increase indigenous vegetation cover and improve habitat quality and ecological connectivity within the Site.

2071. The *Assessment of Ecological Effects* predicts a net gain in terrestrial ecological values following implementation of the proposed restoration and management measures. The ecological management framework also provides for monitoring, maintenance, pest and weed management and adaptive management to support the long-term establishment of the proposed habitats.

2072. While these outcomes must be considered alongside the adverse effects associated with the loss of existing wetlands and other environmental features, the Project will establish an extensive indigenous habitat network within an area presently dominated by modified pasture and exotic vegetation.

2073. The ecological restoration and enhancement measures therefore represent an important component of the Project's environmental outcomes, with benefits for indigenous biodiversity, habitat connectivity and the long-term management of the Wharemaukū Stream corridor.

OPEN SPACE, RECREATION AND COMMUNITY BENEFITS

2074. The Project will provide a network of public and private open spaces, recreational areas, landscaped corridors and pedestrian and cycling connections throughout the development.

2075. These spaces will serve the future residential and commercial activities while also improving opportunities for the wider community to access and move through an area that presently has limited formal public access.

2076. The open space network will connect the proposed residential precincts, Town Centre, Wharemaukū Stream corridor and wetland complex, providing opportunities for recreation, walking, cycling, social interaction and engagement with the Site's freshwater and ecological environments.

2077. The integration of open space with the proposed transport and ecological networks is an important aspect of the Proposal. Rather than providing isolated recreational areas, the development will establish a connected network of streets, public spaces, planted corridors and freshwater environments that contributes to the amenity and accessibility of the wider urban area.

2078. The Project will also support the establishment of a more diverse residential community by providing housing options alongside employment, retail, services, recreation and transport connections within a single comprehensively planned development.

2079. These outcomes will contribute to the social wellbeing of future residents and the wider Kapiti Coast community, while supporting the long-term vitality and functioning of the Paraparaumu Metropolitan Centre.

OVERALL ASSESSMENT OF THE PURPOSE OF THE FTAA

2080. The benefits outlined above demonstrate that the Project is substantially more than a residential or commercial development considered in isolation. It represents a comprehensive urban development project that will deliver additional housing, business capacity, employment, transport infrastructure, flood management, ecological restoration and public open space within an established Metropolitan Centre.

2081. The Project will deliver approximately 593 dwellings, 23,800m² of retail and commercial floorspace and an estimated $527.5 million in development investment. It will materially increase housing supply and choice, strengthen the role and function of the Paraparaumu Metropolitan Centre, generate substantial construction and operational economic activity, and deliver infrastructure and transport connections that support the wider urban area.

2082. The scale of these benefits is significant in the context of the Kapiti Coast District and the wider Wellington Region. In particular, the Project will contribute towards addressing identified housing capacity constraints, provide substantial employment and economic activity, and enable the coordinated development of land already identified for metropolitan centre activities.

2083. The Project will also deliver long-term environmental and community benefits through additional flood storage, enhanced transport connectivity, public open space, ecological restoration and the establishment of an integrated urban environment.

2084. These benefits are not considered in isolation from the adverse environmental effects of the Proposal. As detailed in the assessment of environmental effects, the Project will result in the permanent loss of existing natural inland wetlands, modification and removal of dune landforms and associated effects on ecological, landscape, natural character and cultural values. The proposed biodiversity compensation, landscape treatment, environmental management measures and consent conditions are intended to address those effects, although some cultural concerns remain unresolved.

2085. Notwithstanding these adverse effects, the Project will deliver substantial benefits at a district and regional level. Based on the assessments included in this application and accompanying technical reports, the nature, scale and significance of those benefits demonstrate that the Project is consistent with the purpose of the FTAA.

2086. Given the express direction in clause 17(1) to afford the greatest weight to the purpose of the FTAA, the Project's contribution to that purpose is a particularly important consideration in the Panel's assessment of the resource consent approvals sought.

14.1.2 CLAUSE 17(1)(B) – RELEVANT PROVISIONS OF THE RMA

2087. Clause 17(1)(b) requires the Panel to take into account the provisions of Parts 2, 3, 6 and 8–10 of the RMA that direct decision-making on an application for resource consent, excluding section 104D.

2088. The relevant provisions are addressed throughout this application, including in the assessment of environmental effects, the assessment of RMA Part 2, the statutory assessment and the proposed consent conditions. The principal matters are summarised below.

PART 2 – PURPOSE AND PRINCIPLES

2089. Part 2 of the RMA establishes the purpose and principles of the Act, including sustainable management under section 5, matters of national importance under section 6, other matters under section 7 and the principles of the Treaty of Waitangi under section 8.

2090. A detailed assessment of the Proposal against Part 2 is provided in **Section 12** of this application.

2091. The assessment recognises the substantial social and economic benefits associated with the comprehensive development of the Site, together with the need to appropriately manage adverse effects on freshwater environments, indigenous biodiversity, landscape and natural character values, cultural values and natural hazards.

2092. Particular consideration has been given to the loss of natural inland wetlands, modification of the dune landforms and the relationship of mana whenua with the Site and Wharemaukū Stream. These matters have informed the technical assessments, consideration of alternatives, proposed environmental management measures and ongoing engagement with Te Ātiawa ki Whakarongotai.

2093. The Proposal also incorporates ecological restoration, flood management, open space and infrastructure measures intended to support the sustainable management of the Site as it transitions to an urban environment.

2094. For the reasons set out in the separate Part 2 assessment, the Proposal is considered to appropriately respond to the relevant purpose and principles of the RMA, while recognising the residual adverse effects and outstanding cultural matters identified in the application.

PART 3 – DUTIES AND RESTRICTIONS

2095. Part 3 of the RMA establishes restrictions on the use of land, subdivision, activities in the beds of rivers and lakes, the taking and use of water, and discharges of contaminants, together with other relevant restrictions.

2096. The Proposal requires resource consent for a range of activities regulated under Part 3, including land use and subdivision, earthworks, works affecting freshwater environments, the taking and diversion of water and the discharge of contaminants.

2097. The activities requiring resource consent, relevant planning rules and applicable activity classifications are identified in **Section 9** of this application and the *Statutory Assessment* in **Appendix 2**.

2098. The application seeks the necessary resource consents for the proposed activities and includes the information and assessments required to enable the Panel to determine those approvals. Accordingly, the relevant restrictions under Part 3 are addressed through the resource consent applications before the Panel.

PART 6 – RESOURCE CONSENTS AND DECISION-MAKING

2099. Part 6 of the RMA contains the principal provisions governing applications for resource consent and their determination. The relevant decision-making provisions include sections 104, 105, 106, 106A and 107, together with provisions relating to the duration and conditions of resource consents where applicable.

Section 104 – Consideration of Applications

2100. Section 104(1)(a) requires consideration of the actual and potential effects on the environment of allowing the activity. An assessment of environmental effects is provided in Section 11 of this application, supported by the specialist technical assessments.

2101. The assessment addresses ecological, freshwater, hydrological, flood hazard, stormwater, landscape, visual, cultural, transport, urban design, construction, noise, geotechnical, servicing, contamination and archaeological effects.

2102. The assessment identifies that the majority of adverse effects can be appropriately managed through the design of the Proposal, the recommended mitigation and compensation measures, and the proposed consent conditions. The significant residual effects associated with wetland loss, dune modification and cultural values are also expressly acknowledged.

2103. Section 104(1)(b) requires consideration of the relevant provisions of national environmental standards, national policy statements, regional policy statements and operative and proposed plans. A detailed assessment of the Proposal against the relevant planning documents is provided in Appendix 2 and summarised in Section 13 of this application.

2104. Particular consideration has been given to the NPS-FM, NES-F and relevant regional planning provisions concerning natural inland wetlands and the effects management hierarchy, together with the District Plan provisions relating to the Metropolitan Centre Zone, coastal environment and dune landforms.

2105. The assessment concludes that the Project is generally consistent with the relevant planning framework, while recognising the particular policy tensions arising from wetland reclamation and dune modification. These matters are addressed through the detailed avoidance assessments, proposed ecological compensation, landscape measures and consideration of the specific development outcomes anticipated for Precinct C.

2106. Section 104(1)(c) provides for consideration of any other matter considered relevant and reasonably necessary to determine the application. Relevant matters include the comprehensive planning history of the Site, its Metropolitan Centre zoning and Structure Plan, the findings of the specialist technical assessments, and the engagement undertaken with relevant authorities and mana whenua. Other relevant planning documents include Te Tupu Pai (the Kapiti Coast Growth Strategy), the Wellington–Horowhenua Future Development Strategy and its Implementation Plan, and the Wellington Regional Land Transport Plan. These documents provide further context for the planned growth of Paraparaumu, the role of the Metropolitan Centre and the delivery of strategic transport infrastructure.

Section 105 – Matters Relevant to Discharge Permits

2107. Section 105(1) requires the consent authority, when considering an application for a discharge permit, to have regard to the nature of the discharge and the sensitivity of the receiving environment, the applicant's reasons for the proposed choice, and any possible alternative methods of discharge, including discharge into another receiving environment.

2108. The Proposal involves construction and operational discharges associated with the comprehensive development of the Site, including sediment-laden stormwater during earthworks and stormwater

containing contaminants associated with urban land use, such as copper, zinc and suspended sediment. The nature of these discharges and the sensitivity of the receiving freshwater environment are addressed in Section 14 and the supporting technical assessments.

2109. During construction, discharges will be managed through the erosion and sediment control measures set out in the Draft ECMP, together with proposed monitoring and oversight requirements. Operational stormwater will be managed through the proposed *Stormwater Management Plan*, including bioretention rain gardens and associated treatment and attenuation infrastructure. Any discharges associated with potentially contaminated land will be managed through the relevant NES-CS requirements and a Contaminated Site Management Plan.

2110. The proposed discharge arrangements are necessary to enable the development of the Site for the residential, retail and commercial activities anticipated by its Metropolitan Centre zoning. The proposed methods have been developed through an iterative design process, having regard to the Site's physical constraints, flood management requirements, receiving environment and the need to integrate stormwater management with the wider development.

2111. Alternative stormwater management approaches have been considered through the design process, with the proposed combination of treatment, attenuation, soakage and controlled discharge considered appropriate for the Site. Having regard to these matters, the proposed discharge arrangements are considered acceptable under section 105.

Section 106 – Subdivision and Natural Hazards

2112. Section 106 is relevant to the subdivision component of the Proposal, particularly in relation to natural hazards and the provision of legal and physical access. Section 106(1) enables subdivision consent to be refused, or granted subject to conditions, where there is a significant risk from natural hazards or insufficient provision for legal and physical access. Section 106(1A) requires consideration of the likelihood of natural hazards, the potential for material damage and whether the subsequent use of the land would accelerate or worsen that damage.

2113. The Geotechnical Assessment and Flood Risk Assessment demonstrate that the identified natural hazard risks can be appropriately managed through the proposed earthworks, infrastructure, building platform levels, detailed design and consent conditions.

2114. In relation to geotechnical hazards, Torlesse has undertaken a specific assessment against section 106 in Section 6.2 and Table 13 of the *Geotechnical Assessment Report*. This identifies low to moderate existing risks associated with weak and variable soils, shallow groundwater, liquefaction, lateral spreading and slope instability.

2115. Torlesse has considered the likelihood and potential consequences of these hazards, including the risk of material damage to the proposed allotments, future buildings and infrastructure, and adjoining land. The assessment confirms that liquefaction and lateral spreading risks can be managed through appropriate ground improvement and foundation design, slope stability requirements can be achieved, and settlement risks can be minimised through the removal of unsuitable soils and placement of engineered fill.

2116. Torlesse concludes in Section 8 that, subject to implementation of the recommended engineering measures, the identified geotechnical hazards present a low risk to the land, proposed structures and infrastructure and are unlikely to be accelerated or worsened by the proposed works.

2117. Flood hazards have also been assessed through the *Flood Risk Assessment*, which considers the proposed development levels, flood storage and conveyance arrangements, and potential effects on surrounding land. The assessment identifies that flood risks can be appropriately managed through the proposed design and further detailed design and modelling requirements.

2118. Relying on the findings of Torlesse and the other natural hazard assessments accompanying the application, it is considered that the subdivision will not give rise to a significant risk from natural hazards that would warrant refusal of consent under section 106(1)(a).

2119. In terms of section 106(1)(c), sufficient provision has been made for legal and physical access to each allotment through the proposed road network and associated access arrangements.

2120. Accordingly, the technical assessments do not identify grounds under section 106 that would prevent the granting of subdivision consent, subject to the recommended engineering and consent requirements.

Section 106A – Land Use and Natural Hazards

2121. Section 106A enables the consent authority to refuse a land use consent, or grant consent subject to conditions, where there is a significant risk from natural hazards. The assessment must consider the likelihood of natural hazards, potential material damage to land or structures, whether the proposed use would accelerate or worsen that damage, and potential adverse effects on people's health and safety.

2122. The potential natural hazard risks associated with the proposed land use activities are assessed in Section 11 of this application. As outlined above, Torlesse has assessed the geotechnical hazards affecting the Site, including liquefaction, lateral spreading, slope instability, settlement and groundwater conditions.

2123. Torlesse concludes that the identified hazards can be appropriately managed through ground improvement, engineered fill, specific foundation design and associated construction monitoring. Section 6.6 and Table 17 of the *Geotechnical Assessment Report* assess the residual risks associated with landslips, active faults and liquefaction, including lateral spreading, as low, taking account of the recommended engineering measures.

2124. The Flood Risk Assessment also considers the potential consequences of flood hazards for the proposed development and surrounding land, including the proposed development levels and flood management measures. These measures are intended to ensure that the development can be established and occupied without creating unacceptable flood risks.

2125. Relying on the geotechnical and flood hazard assessments, it is considered that the proposed land use activities will not result in a significant risk from natural hazards, including material damage to land or structures or unacceptable risks to the health and safety of people. Accordingly, subject to implementation of the recommended measures through detailed design and consent conditions, there are no grounds under section 106A that would warrant refusal of land use consent.

Section 107 – Restrictions on Granting Discharge Permits

2126. Section 107 establishes restrictions on the granting of discharge permits where, after reasonable mixing, the discharge is likely to result in specified adverse effects in the receiving waters, including conspicuous oil or grease films, scums, foams or suspended materials; conspicuous changes in colour or visual clarity; objectionable odour; freshwater becoming unsuitable for consumption by farm animals; or significant adverse effects on aquatic life. The section also provides for specified exceptions.

2127. The proposed construction and operational discharges will be managed through the erosion and sediment control measures set out in the Draft ECMP and the operational stormwater treatment measures detailed in the *Stormwater Management Plan*. These measures are intended to minimise the discharge of sediment and other contaminants to the receiving environment.

2128. During construction, erosion and sediment controls will be implemented and maintained in accordance with the relevant GWRC guidance. The Proposal also includes water quality monitoring within the Wharemaukū Stream, including baseline and upstream/downstream monitoring, to identify any construction-related deterioration in water quality and enable corrective action where required.

2129. Operational stormwater will be treated through the proposed bioretention rain gardens and associated stormwater infrastructure prior to discharge. The stormwater management system has been designed to provide treatment of contaminants associated with urban land use, including suspended sediment, copper and zinc.

2130. Having regard to these measures, the proposed discharges are not anticipated, after reasonable mixing, to result in the effects specified in section 107(1)(c)–(g), including significant adverse effects on aquatic life. Accordingly, section 107 is not considered to preclude the granting of the discharge permits sought.

Consent Conditions

2131. The proposed consent conditions address the management of construction and operational effects, infrastructure delivery, subdivision staging, ecological restoration and compensation, landscape treatment, monitoring and other measures necessary to support the implementation of the Proposal.

Section 104D – Non-Complying Activities

2132. Section 104D is expressly excluded from consideration under clause 17(1)(b). While the Proposal has an overall non-complying activity status, the conventional gateway tests under section 104D do not apply to the Panel's decision under the FTAA. Accordingly, the Proposal is not required to satisfy either of those tests, although its environmental effects and the relevant objectives and policies of the applicable planning instruments remain matters for consideration under clause 17(1).

Overall Assessment

2133. Overall, the relevant Part 6 matters have been addressed through the assessments accompanying the application, and the proposed conditions provide a framework for managing the identified effects and implementing the required environmental and infrastructure measures. In particular, the technical assessments demonstrate that the proposed subdivision and land use activities can be undertaken without significant natural hazard risks, and that the proposed discharge arrangements can be appropriately managed having regard to sections 105 and 107 of the RMA.

PARTS 8–10 – OTHER RELEVANT RMA PROVISIONS

2134. Parts 8–10 of the RMA contain provisions relating to designations, heritage orders, subdivision and other matters relevant to the administration and implementation of resource consents.

Section 176(1)(b) – Works Within Designations

2135. As outlined in Section 7 above, portions of the Site are subject to designations held by NZTA and KCDC. Accordingly, written approval under section 176(1)(b) of the RMA may be required for works within these designated areas where they would prevent or hinder the designated purposes.

2136. In relation to NZTA-005, the Applicant has engaged with NZTA regarding the extent of the designation and the proposed works within it. NZTA has indicated that the designation boundaries are expected to be reduced in the future, as there does not appear to be an ongoing requirement to retain the areas extending into the Site for State Highway purposes. On this basis, the Applicant does not anticipate any significant difficulties obtaining the necessary approval for works within the designation.

2137. The Proposal also includes minor wastewater infrastructure works on NZTA-owned land, involving trenching to relocate an existing wastewater main adjacent to an existing path, which will be reinstated following completion of the works. These works are located within the Expressway designation but are well removed from the Expressway itself and are not anticipated to prevent or hinder its designated purpose. This is consistent with the discussions undertaken with NZTA. An alternative wastewater main alignment through adjoining KCDC-owned land is also included within the Application Site, should any issues arise with obtaining the necessary approval for the works on NZTA land.

2138. The potential flood effects on NZTA land have also been assessed in Section 9.6 of the *Flood Risk Assessment* in Appendix 15. The assessment identifies small increases in flood depth within the existing flood management and mass planting areas during the 10-year and 100-year ARI events. Envelope concludes that:

> *"These are considered acceptable, as the purpose of this area (from consent documentation) is for flood management and planting."*

2139. The assessment further confirms that the increases are minor, with negligible changes in effects, including no anticipated increase in maintenance requirements and no mapped changes in flood velocity. Accordingly, the flood modelling does not identify any material adverse effects on the function of NZTA's existing flood management areas or the operation of the Expressway.

2140. Having regard to the limited wastewater works, the proposed construction management measures, the findings of the Flood Risk Assessment and the engagement undertaken with NZTA, the Applicant does not anticipate that the Proposal will prevent or hinder the designated purpose. Notwithstanding, if further engagement with NZTA confirms section 176(1)(b) is required, it will be obtained prior to undertaking the relevant works.

2141. In relation to the KCDC designation, KCDC has been closely involved in the development of the Proposal and has provided landowner approval for works affecting Council-owned land. While this approval is separate from any approval required under section 176(1)(b), it provides confidence that the necessary requiring authority approvals can be obtained.

2142. Any approvals required under section 176(1)(b) will be obtained prior to undertaking the relevant works. Having regard to the discussions undertaken with both requiring authorities, the limited nature of the works affecting the KCDC designations and the anticipated future reduction of the NZTA designation boundaries, the Applicant does not consider that these approvals will present a material impediment to the implementation or delivery of the Project.

2143. Part 10 – Subdivision

2144. The subdivision component of the Project is also subject to the relevant provisions of Part 10, including the requirements for subdivision approval, survey plans, certification and the creation or vesting of roads, reserves and other land and infrastructure.

2145. The proposed subdivision scheme plans identify the intended allotments, roads, reserves and access arrangements, with the detailed survey and certification requirements to be addressed through the subdivision consent conditions and subsequent implementation stages.

2146. The proposed conditions also provide for the staged delivery of infrastructure, completion of subdivision works and certification requirements necessary to ensure that the development can proceed in an orderly and coordinated manner.

2147. To the extent that other provisions within Parts 8–10 are relevant to the implementation of the Project, these will continue to apply in accordance with the RMA and the approvals granted under the FTAA.

OVERALL ASSESSMENT OF CLAUSE 17(1)(B)

2148. The application provides a comprehensive assessment of the relevant RMA decision-making provisions, supported by the technical reports, statutory assessment and proposed consent conditions.

2149. The Proposal will result in substantial changes to the existing environment, including significant effects associated with wetland reclamation and dune modification. However, the assessments demonstrate that the Project has been designed having regard to the relevant RMA requirements, with measures proposed to manage adverse effects and provide for the coordinated development of the Site.

2150. For the reasons set out in the relevant sections of the application, it is considered that the matters identified in clause 17(1)(b) have been appropriately addressed.

14.1.3 CLAUSE 17(1)(C) – OTHER RELEVANT LEGISLATION

2151. Clause 17(1)(c) requires the Panel to take into account the relevant provisions of any other legislation that directs decision-making under the RMA.

2152. Parts 8–10 of the RMA contain provisions relating to designations, heritage orders, subdivision and other matters relevant to the administration and implementation of resource consents.

Section 176(1)(b) – Works Within Designations

2153. As outlined in Section 6 above, portions of the Site are subject to designations held by NZTA and KCDC. Accordingly, written approval under section 176(1)(b) of the RMA may be required for works within these designated areas where they would prevent or hinder the designated purposes.

2154. In relation to NZTA-005, the Applicant has engaged with NZTA regarding the extent of the designation and the proposed works within it. NZTA has indicated that the designation boundaries are expected to be reduced in the future, as there does not appear to be an ongoing requirement to retain the areas extending into the Site for State Highway purposes. On this basis, the Applicant does not anticipate any significant difficulties obtaining the necessary approval for works within the designation.

2155. In relation to the KCDC designation, KCDC has been closely involved in the development of the Proposal and has provided landowner approval for works affecting Council-owned land. While this approval is separate from any approval required under section 176(1)(b), it provides confidence that the necessary requiring authority approvals can be obtained.

2156. Any approvals required under section 176(1)(b) will be obtained prior to undertaking the relevant works. Having regard to the discussions undertaken with both requiring authorities, the limited nature of the works affecting the KCDC designations and the anticipated future reduction of the NZTA designation boundaries, the Applicant does not consider that these approvals will present a material impediment to the implementation or delivery of the Project.

Part 10 – Subdivision

2157. The subdivision component of the Project is also subject to the relevant provisions of Part 10, including the requirements for subdivision approval, survey plans, certification and the creation or vesting of roads, reserves and other land and infrastructure.

2158. The proposed subdivision scheme plans identify the intended allotments, roads, reserves and access arrangements, with the detailed survey and certification requirements to be addressed through the subdivision consent conditions and subsequent implementation stages.

2159. The proposed conditions also provide for the staged delivery of infrastructure, completion of subdivision works and certification requirements necessary to ensure that the development can proceed in an orderly and coordinated manner.

2160. To the extent that other provisions within Parts 8–10 are relevant to the implementation of the Project, these will continue to apply in accordance with the RMA and the approvals granted under the FTAA.

14.1.4 SECTION 81(2)(AAB) – GOVERNMENT POLICY STATEMENTS

2161. Section 81(2)(aab) of the FTAA requires the Panel to consider any relevant Government policy statement issued under the Act.

2162. Section 10A of the FTAA provides for Government policy statements identifying the Government's policies concerning the regional or national benefits of particular types of infrastructure or development projects.

2163. The Government Policy Statement on Housing and Urban Development 2025 provides relevant national policy context for the housing and urban development outcomes of the Project. Its vision is that: *"Everyone in New Zealand lives in a home and within a community that meets their needs and aspirations."*

2164. The Project aligns with this vision through the provision of approximately 593 new homes within a comprehensively planned mixed-use extension to the Paraparaumu Metropolitan Centre. The development will provide a diverse range of housing typologies and sizes, increasing housing supply and choice within an established and accessible urban location.

2165. The Project will also support the establishment of a well-functioning community through the integration of housing with employment, retail, services, transport connections, public open space and recreational opportunities.

2166. The location of the development is particularly relevant. The Site is already zoned for comprehensive urban development and is situated immediately adjoining the existing Metropolitan Centre, providing opportunities for new residents to access a substantial range of existing and proposed services and facilities.

2167. The Project will also make a material contribution towards addressing the District's identified housing capacity constraints, with the Economic Assessment identifying an increase in estimated greenfield housing capacity from approximately 6.2 years to 8.7 years.

2168. The proposed housing outcomes are supported by substantial investment in infrastructure, transport connectivity, flood management and public open space, enabling the additional residential development to be accommodated within a comprehensively planned urban environment.

2169. Overall, the Project is consistent with the wider Government policy direction towards increasing housing supply, improving housing choice and enabling the development of accessible and well-serviced communities.

14.1.5 OVERALL CONCLUSION

2170. Clause 17(1) establishes a decision-making framework that gives the greatest weight to the purpose of the FTAA, while also requiring consideration of the relevant RMA provisions and other applicable legislation.

2171. The assessment above demonstrates that the Project will deliver substantial regional and district benefits through increased housing supply and choice, significant investment and employment generation, expansion of the Paraparaumu Metropolitan Centre, improved transport connectivity, infrastructure provision, flood management, ecological restoration and public open space.

2172. The Project will enable the comprehensive development of a large, strategically located site that has long been identified for urban development. Its integrated design will allow residential, retail and commercial activities to be delivered alongside the infrastructure and environmental management measures necessary to support that development.

2173. The relevant RMA decision-making provisions have been addressed through the assessment of environmental effects, statutory assessment, supporting technical reports and proposed consent conditions. These assessments recognise the adverse effects associated with the Project, particularly the loss of natural inland wetlands, dune modification and outstanding cultural concerns, and identify the measures proposed to manage those effects.

2174. It is considered that the Project will make a significant contribution to the purpose of the FTAA through the delivery of substantial and enduring regional and district benefits. Having regard to the greatest weight required to be given to that purpose under clause 17(1), together with the other relevant statutory considerations, the Project is considered to be strongly supported by the decision-making framework established under the FTAA.

15. PART A CONCLUSION

2175. This Substantive Application seeks resource consents under the FTAA to enable the comprehensive development of New Central Park at 77 and 109 Kapiti Road and 1 Brett Ambler Way, Paraparaumu, together with associated works on adjoining land. The Project will deliver a significant mixed-use extension to the Paraparaumu Metropolitan Centre, incorporating residential, retail and commercial development, transport and three waters infrastructure, open space, ecological restoration and flood management.

2176. The Project will provide 593 residential dwellings across a range of housing typologies, approximately 23,800m² of retail and commercial floorspace, and the new Town Centre Link Road connecting Kapiti Road with Ihakara Street. It will also establish an integrated network of streets, pedestrian and cycling connections, public open spaces and supporting infrastructure. These outcomes will enable the comprehensive development of land that has long been identified for urban development under the Metropolitan Centre Zone and associated Structure Plan.

2177. The assessment of environmental effects in Section 11, supported by the specialist technical assessments, demonstrates that the majority of potential adverse effects can be appropriately managed through the design of the Proposal, mitigation measures, detailed engineering requirements and proposed consent conditions. Particular consideration has been given to freshwater ecology, hydrology, stormwater and flooding, transport, landscape and visual amenity, cultural values, natural hazards and construction-related effects.

2178. The Project will nevertheless result in significant adverse ecological effects through the permanent reclamation of approximately 5.33ha of natural inland wetlands, together with the removal and modification of existing dune landforms and associated effects on landscape, natural character and cultural values. The practicability of avoiding and minimising these effects has been considered through the design process and supporting technical assessments, having regard to the physical constraints of the Site and the infrastructure, flood management and urban development outcomes anticipated for Precinct C.

2179. The residual ecological effects of wetland loss are proposed to be addressed through biodiversity compensation, principally comprising the establishment of approximately 5.44ha of indigenous wetland habitat, together with associated restoration, monitoring and long-term management measures. The ecological assessments predict that these measures will achieve no net loss of wetland extent and a net positive outcome for wetland biodiversity values, subject to successful implementation. The Proposal also incorporates enhancement of the Wharemaukū Stream corridor, indigenous planting and an integrated open space and ecological network.

2180. The cultural effects identified by Te Ātiawa ki Whakarongotai are acknowledged, particularly in relation to the loss of existing dunes, wetland reclamation and opportunities for further restoration of the Wharemaukū Stream. These matters have informed the development of the Proposal and remain the subject of ongoing engagement. It is recognised that the proposed ecological and landscape measures do not necessarily resolve all cultural effects identified by mana whenua.

2181. The statutory assessments in Sections 11, 12 and 14, together with the detailed assessment in **Appendix 2,** demonstrate that the Proposal has been considered against the relevant RMA provisions, national policy statements, national environmental standards, regional and district planning provisions, and the decision-making criteria under the FTAA. While the Proposal gives rise to particular policy tensions associated with wetland reclamation and dune removal, these matters have been expressly addressed, including through the assessment of practicable avoidance options and the proposed environmental management measures.

2182. Importantly, the Project will deliver substantial and enduring benefits for the Kapiti Coast District and wider Wellington Region. These include a significant increase in housing supply and choice, substantial development investment and employment opportunities, additional retail and commercial capacity, improved transport connectivity, flood management infrastructure, ecological restoration and enhanced public access and recreational opportunities. The comprehensive nature of the Project will enable these outcomes to be delivered in a coordinated manner within an established urban centre.

2183. The purpose of the FTAA is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. Clause 17(1) of Schedule 5 requires the greatest weight to be given to that purpose when considering resource consent applications. Having regard to the nature, scale and significance of the benefits identified above, the Project is considered to be consistent with the purpose of the FTAA.

2184. Section 85(3) of the FTAA provides that, subject to the mandatory decline grounds, the Panel may decline an approval only where it is satisfied that one or more adverse impacts are sufficiently significant to be out

of proportion to the Project's regional or national benefits. While the Project will result in significant adverse effects, particularly through wetland reclamation and dune removal, these effects have been considered alongside the proposed mitigation and compensation measures and the substantial benefits associated with the Project. In my opinion, the identified adverse impacts are not sufficiently significant to be out of proportion to those benefits.

2185. Overall, having regard to the assessment of environmental effects, the relevant statutory and planning framework, the proposed consent conditions and the significant regional benefits of the Project, it is considered that the Proposal has been appropriately assessed against the relevant requirements of the FTAA and that the resource consents sought can be granted, subject to appropriate conditions of consent.

PART 2

APPLICATION FOR ARCHAEOLOGICAL AUTHORITY

16. INTRODUCTION

2186. An Archaeological Assessment has been undertaken for the Site and is provided in **Appendix 34**. An Archaeological Management Plan has also been prepared and is provided in **Appendix 35.**

16.1 INFORMATION REQUIREMENTS

2187. The following table identifies how the substantive application addresses the information requirements for an archaeological authority under clause 2(1) of Schedule 8 of the FTAA.

TABLE 1: ARCHAELOGICAL AUTHORITY INFORMATION REQUIREMENTS		
CLAUSE	INFORMATION REQUIREMENT	ASSESSMENT / REFERENCE
2(1)(a)	Legal description of the land.	The legal descriptions of the land comprising the Project Site are provided in Section 6 – Site Description of the Substantive Application. The Project Area is also identified in Appendix 34 – Archaeological Assessment of Effects, Section 1.1 and Figure 2.
2(1)(b)	Name of the landowner, where the applicant is not the owner.	The registered owners of the relevant land parcels are identified in Section 6 – Site Description of the Substantive Application, including land owned by Kāpiti Coast District Council.
2(1)(c)	Proof of landowner consent, where provided.	The relevant landownership arrangements are identified in Section 6 of the Substantive Application. Refer also KCDC letter in Appendix 39 that provides landowner approval.
2(1)(d)	Confirmation of compliance with sections 42, 43 and 44 of the FTAA.	Compliance with the relevant statutory requirements is addressed in Section 3 – Fast-track Eligibility and Statutory Requirements of the Substantive Application, together with Part 2 – Archaeological Authority Application.

2(1)(d)	Confirmation that the application relates solely to a listed or referred project.	New Central Park is a listed project under Schedule 2 of the FTAA. The application relates solely to that project, as addressed in Section 3 of the Substantive Application.
2(1)(d)	Payment of prescribed fees, charges or levies.	Any prescribed fees, charges or levies payable in respect of the application will be paid through the EPA lodgement process.
2(1)(e)	Description and location of each archaeological site.	Appendix 34 – Archaeological Assessment of Effects, Section 5.4.2 and Figure 10, identifies recorded archaeological site R26/829, comprising a shell midden scatter, and considers the potential for additional archaeological sites. Appendix 35 – Archaeological Site Management Plan, Section 4 and Figure 3, identifies the proposed archaeological monitoring areas.

2213.

17. FAST TRACK APPROVALS ACT 2024

2214. Pursuant to section 42(4)(i) of the FTAA, the Applicant is seeking an Archaeological Authority under the HNZPTA. This Part 3 of this Application has been informed by:

- Section 43(3)(i) of the FTAA which requires that the requirements of Schedule 8, clause 2 is met for an Archaeological Authority; and
- Section 81(1)(3)(j) of the FTAA which directs the decision maker to consider Clauses 4 and 5 of Schedule 8 for an Archaeological Authority.

2215. Heritage New Zealand Pouhere Taonga (HNZPT) is an administering agency and have a fast track procedure in place as part of the FTAA process. An Archaeological Authority application submission will be via the EPA portal as part of the FTAA process. HNZPT is responsible for their organisation's specific Act (Heritage New Zealand Pouhere Taonga Act 2014 in relation to Archaeological Authorities) via EPA's project approval process.

18. SITE DETAILS

2216. While provided in Part 1 above, please also see application site details below.

RECORD OF TITLE IDENTIFIER	LEGAL DESCRIPTION	REGISTERED OWNER
822686	Section 3 SO 501569	New Central Park Limited
822629	Section 4 SO 501569	New Central Park Limited
636810	Lot 4 DP 470759	Kāpiti Coast District Council
175334	Lot 6 DP 342714	Kāpiti Coast District Council
1068482	Sections 1–4 SO 570550	Kāpiti Coast District Council
175335	Lot 7 DP 342714	Kāpiti Coast District Council
265124	Lot 13 DP 361734	Kāpiti Coast District Council
822685	Section 1 SO 501569	Kāpiti Coast District Council
822628	Section 2 SO 501569	Kāpiti Coast District Council

19. PROPOSAL

2247. The proposed activity is described in detail in Section 7 of this Application. In summary, the Project involves the comprehensive redevelopment of the Site to establish a mixed-use development comprising residential, commercial and retail activities, supported by an integrated road network, servicing infrastructure, public open spaces and ecological restoration areas.

2248. The Project includes:

- Subdivision and development of the Site to accommodate approximately 593 residential units, together with large-format retail, specialty retail and other commercial activities.
- Construction of the internal road network, intersections, pedestrian and cycle connections, and associated infrastructure.
- Bulk earthworks, including modification and removal of existing dune landforms to establish suitable development platforms, roads, servicing infrastructure and flood management areas.
- Modification and realignment of existing drainage features, construction of stormwater management infrastructure and establishment of flood storage areas.
- Creation of an indigenous wetland complex and associated ecological restoration, riparian planting and open space areas.

2249. The proposed earthworks will extend across substantial areas of the Site, including the remnant dune landforms where archaeological material is considered most likely to be encountered.

2250. An *Archaeological Authority* is therefore sought to authorise the modification or destruction of recorded archaeological site R26/829 and any previously unrecorded archaeological sites that may be encountered during the works.

20. ARCHAEOLOGICAL VALUES

2251. A detailed assessment of the archaeological values of the Site is provided in Section 7 of the *Archaeological Assessment* in **Appendix 34.**

2252. The assessment identifies one recorded archaeological site within the Project Area, R26/829, and considers that there is a high probability of further archaeological sites being encountered during earthworks, particularly within the remnant dune landforms.

2253. The most likely archaeological features are shell middens and ovens or fire hearths associated with pre-European Māori occupation and use of the area.

2254. The *Archaeological Assessment* evaluates the potential archaeological values of these features having regard to their condition, rarity, contextual value, information potential, amenity value and cultural associations.

Sites	*Value*	*Assessment*
Midden/oven (R26/829 and unrecorded)	*Condition*	*R26/829 is at least partially visible on the ground surface, but these deposits are likely to be largely below the topsoil layer. Condition Value: Variable, but likely well preserved in most cases.*
	Rarity/ Uniqueness	*Middens and ovens are very common on the Kapiti Coast. Rarity/Uniqueness Value: Low.*
	Contextual Value	***Any archaeological sites within the Project Area would primarily be of local significance. Shell midden sites are the most common archaeological site type identified in the NZ archaeological record. However, when considered on a regional scale, a group of sites can provide significant information on the past settlement, economy, and environment of that region, in this case the Kapiti Coast.***

		Contextual Value: Moderate.
	Information Potential	***Shell midden sites are the most likely archaeological site type to be found in the Project Area. Kapiti Coast middens typically have moderate scientific values, providing information on site type, nature, location, extent, relationship with environment, how that environment may have changed, relationship with other sites and age. There is some potential for high scientific value middens.*** *Information Potential: Moderate.*
	Amenity Value	***Visually, the type of archaeological sites likely to be located within the Project Area are not impressive or distinctive. Archaeological sites are currently not visible to the public and, if present, are located on private land. Any archaeological sites identified during development are likely to be destroyed or significantly modified.*** *Amenity value: Low.*
	Cultural Associations	*Archaeological sites will hold Māori cultural values.*

2255. Overall, the assessment identifies that archaeological sites within the Project Area are likely to have variable condition, low rarity and amenity values, and moderate contextual and information values. The assessment also recognises that archaeological sites will hold Māori cultural values.

2256. While midden and oven sites are relatively common within the Kapiti Coast, their investigation can provide information on the nature and extent of historical occupation, settlement patterns, resource use and the relationship between archaeological sites and the surrounding environment.

21. ARCHAEOLOGICAL EFFECTS ASSESSMENT

2257. Section 8 of the *Archaeological Assessment* considers the potential effects of the Project on archaeological values.

2258. The assessment identifies that one archaeological site has been recorded within the Project Area (R26/829) and that there is a high probability of further archaeological sites being exposed during earthworks within the remnant dune landscape.

2259. Archaeological features are most likely to occur within the upper 500 mm of soil, meaning that excavation within the dune landforms has the potential to modify or destroy archaeological material.

2260. The *Archaeological Assessment* considers that avoiding all potential archaeological sites is not practicable given the extent of earthworks required across the Site, including the modification of existing dune landforms.

2261. The assessment therefore recommends that:

1. The assessment therefore recommends that:*An Archaeological Authority should be sought from HNZPT to cover the earthworks for the Project Area.*

2. *An Archaeological Management Plan should be developed to outline the archaeological monitoring strategy. This will be required for the Archaeological Authority application.*

3. *All cut earthworks within the sand dune areas of the Project Area should be monitored by an archaeologist.*

4. *All archaeological sites that are uncovered must be recorded by an archaeologist. Samples may need to be taken for analysis and radiocarbon dating.*

5. *Archaeological sites that are uncovered during the works will hold Māori cultural values, and mana whenua should be consulted regarding the Archaeological Authority application and this assessment report.*

2262. The assessment then concludes that:

> *Overall, effects on archaeological sites within the Project Area are considered acceptable provided that any archaeological sites encountered during earthworks are adequately recorded and analysed by an archaeologist through targeted archaeological monitoring. It is a legal requirement that New Central Park Ltd applied for an Archaeological Authority to cover the entirety of the development area, and that an Archaeological Management Plan is prepared by and approved by HNZPT ahead of the physical works.*

22. ARCHAELOGICAL MANAGEMENT PLAN

2263. An *Archaeological Management Plan* has been prepared and is provided in Appendix 35.

2264. The Plan establishes the procedures for managing archaeological effects during construction, including:

- Targeted archaeological monitoring of cut earthworks within the dune areas.
- Procedures for identifying, recording and investigating archaeological sites or material encountered during works.
- Sampling and analysis of archaeological material, including radiocarbon dating where appropriate.
- Procedures for managing archaeological discoveries and associated construction activities.
- Protocols for engagement with mana whenua regarding archaeological sites and material of Māori origin.
- Reporting and recording requirements associated with the Archaeological Authority.

2265. Implementation of the *Archaeological Management Plan* will ensure that archaeological material encountered during construction is appropriately investigated and recorded, and that relevant information is recovered before sites are modified or destroyed.

22.1 IWI ENGAGEMENT

2266. The project archaeologist has provided the Archaeological Management Plan to Muaūpoko, Ngāti Toa Rangatira and Te Ātiawa for their consideration.

2267. The Plan includes procedures for mana whenua involvement where archaeological sites or material of Māori origin are encountered during construction. This recognises that archaeological material may hold cultural values in addition to its archaeological and scientific values.

2268. The Archaeological Authority and associated management procedures will provide a framework for the identification, investigation and management of archaeological material, including opportunities for mana whenua involvement in accordance with the Archaeological Management Plan.

23. OVERALL ASSESSMENT

2269. Archaeological effects of the Project relate to the potential modification or destruction of recorded and presently unrecorded archaeological sites during earthworks. While these effects cannot be entirely avoided, the *Archaeological Assessment* concludes that they can be appropriately managed through archaeological monitoring, investigation, recording and analysis.

2270. The proposed *Archaeological Management Plan* provides the framework for undertaking these activities and for managing discoveries during construction, including engagement with mana whenua.

2271. Accordingly, subject to the conditions of the Archaeological Authority and implementation of the *Archaeological Management Plan*, the archaeological effects of the Project are considered acceptable.

24. CONCLUSION

2272. An Archaeological Authority is required because the proposed earthworks have the potential to modify or destroy recorded archaeological site R26/829 and presently unrecorded archaeological sites within the Project Area.

2273. The Archaeological Authority is sought as part of this Substantive Application under the FTAA.

2274. The application is supported by the *Archaeological Assessment* in Appendix 34 and the *Archaeological Management Plan* in Appendix 35. These documents identify the archaeological values of the Project Area, assess the potential effects of the proposed works and establish procedures for archaeological monitoring, investigation, recording and analysis.

2275. The *Archaeological Management Plan* has also been provided to Muaūpoko, Ngāti Toa Rangatira and Te Ātiawa as part of the Applicant's engagement regarding archaeological matters.

2276. The *Archaeological Assessment* concludes that the potential effects on archaeological values are acceptable, provided that appropriate archaeological monitoring and investigation are undertaken. The proposed Archaeological Management Plan establishes the measures necessary to achieve this outcome.

2277. On the basis of the conclusions reached in the *Archaeological Assessment*, the proposed management measures and the matters relevant to an Archaeological Authority under Schedule 8 of the FTAA, it is considered appropriate to grant the Archaeological Authority, subject to conditions requiring implementation of the Archaeological Management Plan.