

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



28 JAN 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0026255

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act (FTAA) on the following applications:

- Out of Scope [REDACTED]
- [REDACTED]
- Otaihanga Retirement Village, FTAA-2511-1149
- Out of Scope [REDACTED]
- [REDACTED]
- [REDACTED]

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

[REDACTED]

Out of Scope

Otaihanga Retirement Village, FTAA-2511-1149

This proposal is to construct and establish a retirement village on the Kāpiti Coast, in the Wellington region over a seven-year development period. The development will include approximately 250 independent living units, a main building with approximately 40 assisted living suites, 40 care suites and a range of residential amenities.

According to the economic assessment provided by the applicant, the proposal is estimated to have a \$132 million net present value and provide the equivalent of 68 direct full-time jobs for the duration of the development period. The project will also provide the equivalent of 112 indirect and induced full time equivalent jobs for during this development period.

The primary long-term benefit of this proposal is the provision of additional housing which is critical for a growing economy. Given that this application would provide a significant boost in the housing supply, it could also be assessed under increasing the supply of housing, address housing needs, or contribute to a well-functioning urban environment (s22(2)(a)(iii) of the Fast-track Approvals Act).

Out of Scope

Out of Scope



Out of Scope

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis
Minister for Economic Growth



ĀTIAWA KI WHAKARONGOTAI CHARITABLE TRUST

To: Fast-track Referrals team
From: Ātiawa ki Whakarongotai Charitable Trust
Date: 5/02/2026

Tēnā koe,

This letter provides comment from Ātiawa ki Whakarongotai Charitable Trust in relation to the referral application for CRM:0139008931 Otaihanga Retirement Village (the application).

Ātiawa ki Whakarongotai Charitable Trust represents the interests of Te Ātiawa ki Whakarongotai for the purposes of resource management and resource consent processes within our rohe. Our comments are provided in our capacity as mana whenua, guided by our responsibilities of kaitiakitanga, and informed by our Kaitiakitanga Plan, which sets out our values, priorities, and expectations in relation to the management of land, water, and natural resources.

This letter provides high-level comments on the referral application and is structured under a small number of key themes relevant to our role as mana whenua.

1. Regional or national significance

We do not consider that the application demonstrates that the proposed development is of regional or national significance.

While the application refers to housing supply and economic benefits, these benefits appear to be primarily local and private in nature and have not been shown to deliver outcomes that are significant at a regional or national scale. From a mana whenua perspective, the proposal does not address any regionally or nationally significant issues relating to environmental restoration, climate resilience, or the protection and enhancement of culturally significant landscapes or ecosystems.

Accordingly, we do not consider that the project, as currently described, meets the threshold intended for referral under the Fast-track Approvals Act.

2. Wetlands and freshwater values

The site contains natural wetlands that are of significance within our rohe and form part of the wider freshwater and ecological system connected to the Waikanae River catchment.

Natural wetlands are taonga. They hold ecological, cultural, and spiritual values and are integral to the exercise of kaitiakitanga by Ātiawa ki Whakarongotai. The proposed reclamation and modification of wetlands raises serious concerns for us, particularly given that:

- Wetland reclamation in this location is currently identified as a prohibited activity under the relevant freshwater regulations; and
- The application relies on offsetting approaches that appear to prioritise stormwater and flood management functions rather than the restoration or replacement of equivalent cultural and ecological wetland values.

From our perspective, constructed or engineered wetlands designed primarily for infrastructure purposes do not adequately compensate for the loss of existing natural wetlands or the associated cultural values, mauri, and whakapapa connections.

The application does not demonstrate how adverse effects on wetlands will be avoided, and we are not satisfied that the proposed mitigation or offsetting approach aligns with our Kaitiakitanga Plan or with tikanga-based approaches to freshwater management.

3. Engagement with Ātiawa ki Whakarongotai

Engagement with Ātiawa ki Whakarongotai Charitable Trust to date has been very limited.

We have had some engagement with the applicant in relation to the plan change component of the proposal. However, there has been little meaningful engagement with us regarding the resource consent aspects of the project, including the impacts on wetlands, freshwater systems, and cultural values.

This level of engagement has not enabled us to:

- Fully understand the proposal and its effects;
- Provide informed input at an early stage; or
- Participate in the shaping of the proposal in a way that reflects our role as mana whenua and kaitiaki.

Early, clear, and ongoing engagement is essential for equitable and effective consultation, particularly for a project of this scale and with potentially significant impacts on taonga.

4. Our expectations should the proposal proceed

Given the scale of the proposal and the severity of potential impacts, particularly in relation to on-site wetlands and freshwater values, if the project proceeds beyond the referral stage we set out the following expectations for any substantive application process:

a. Cultural Impact Assessment (CIA)

We require the opportunity to prepare a Cultural Impact Assessment that is led by Ātiawa ki Whakarongotai Charitable Trust and grounded in our Kaitiakitanga Plan, mātauranga Māori, and tikanga.

b. Co-creation of consent conditions

We expect to be involved in the co-creation of consent conditions, particularly those relating to wetlands, freshwater management, monitoring, restoration, and ongoing site management.

c. Partnership agreement

We require a formal partnership agreement to establish the terms under which Ātiawa ki Whakarongotai Charitable Trust will engage with the applicant. This should address matters such as governance, information sharing, resourcing, monitoring, and long-term involvement in environmental outcomes on the site.

d. Early and informed engagement

Throughout any future stages of the project, we require early, transparent, and well-resourced engagement to ensure that consultation is informed, meaningful, and equitable.

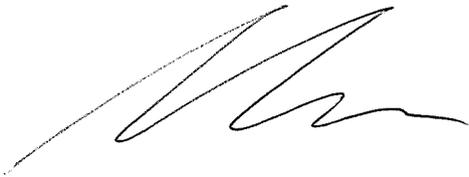
5. Closing

Ātiawa ki Whakarongotai holds enduring responsibilities as kaitiaki within this rohe. Any development proposal must demonstrate respect for these responsibilities and must align with the values and expectations set out in our Kaitiakitanga Plan.

At this stage, we do not consider that the referral application adequately addresses the cultural, environmental, and engagement matters that are fundamental to our role as mana whenua.

We also do not consider this proposal to have regional or national significance.

Nāku noa, nā



Richard Evans

Kaiwhakahaere Matua

Richard.Evans@teatiawakikapiti.co.nz

Ātiawa ki Whakarongotai Charitable Trust

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Otaihanga Retirement Village
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Department of Conservation (DOC)		
*First name	Bridgette		
*Last name	Munro		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz;		

2. Please provide your comments on this application
Comments follow overleaf.

Manager's signoff

Jenni Fitzgerald

10th February 2026

Director-General of Conservation s17 comments

Project name	Otaihanga Retirement Village
Applicant name	Summerset Villages (Paraparaumu) Limited
Application number	FTAA-2511-1149
Project summary details	<p>The Otaihanga Retirement Village project is to construct and establish a retirement village on approximately 12.6 hectares of land at 73 Ratanui Road in Paraparaumu, Kāpiti, in the Wellington region. The project includes:</p> <ul style="list-style-type: none"> • approximately 250 independent living units consisting of cottages and villas, • a central main building comprising of approximately 40 assisted living suites and 40 care suites, • a range of resident amenities such as a bowling green, pickleball court, pétanque court, • internal circulation and parking provision, • extensive site landscaping including a restoration of wetlands on the site and utilisation of stormwater management wetlands, and • earthworks to construct infrastructure and upgrades to the roading network required to serve the Development. <p>The Applicant seeks resource consent approvals under the Resource Management Act 1991 ('RMA'), wildlife approval under the Wildlife Act 1953 - to relocate any lizards if these are identified through monitoring or during the construction phase, and archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014. No other approvals under specified Acts are sought as part of the application.</p>

1 General comment

- 1.1.1 As the project includes an approval under a specified Act for which DOC is the administering agency, the Applicant was required to undertake pre-lodgement consultation in accordance with section 11(e) of the Fast-track Approvals Act 2024 ('FTAA'). DOC and the Applicant met on the 30th of October 2025. DOC provided written feedback to the Applicant on the 28th of November 2025.
- 1.1.2 While DOC does not have sufficient information to determine the level of any actual and potential environmental effects, DOC considers that it is likely that with the appropriate design and conditions, effects can be managed to appropriate levels.
- 1.1.3 DOC is not aware of any reason that the project should not be referred.

2 Minister's decision on referral application

- 2.1.1 FTAA sections 21 and 22 set out matters to be considered in determining whether a referral application should be accepted.
- 2.1.2 DOC notes that other agencies are better placed to comment on most matters. Comments below are limited to sections where DOC has specific interests or information relevant to the Minister's decision.
- 2.1.3 DOC has considered the criteria in section 22 and has not identified anything it considers the Minister should take into account that has not already been acknowledged by the Applicant in its referral application.
- 2.1.4 DOC has the following comments on sections 21(3) and (4), and section 22:

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	DOC has considered section 5(1) (f), (h), (i), (j) and (k). DOC has not identified any aspect of the project that would be ineligible under these sections.
21(3)(c)	Is there adequate information to inform a decision	<p>While DOC considers the information adequate in terms of a referral decision, DOC notes that the Ecology Memo provided with the referral application includes a summary of the ecological baseline and a preliminary assessment of ecological effects, however, no detailed ecological information was included.</p> <p>With regard to wetlands, DOC notes that for a survey of the wetland values of the area to be sufficient, the survey should be conducted when the wetland area is drying or has just dried. In this respect, it is considered that early to mid-summer surveys will likely best assist in accurately assessing the flora of the area. Further, DOC considers that to understand the zonation of the wetlands on the site and due to their size, smaller plot sizes (i.e. 0.5 x 0.5m) are required. Qualitative data and description of the pasture should also be provided so as to confirm that it is no longer an inland dune, with dune hollows / slacks. DOC considers that if the site is found to have representative components of ephemeral wetlands, dune hollows, dune slacks or inland dunes, then appropriate protection will be required. A restoration plan with maintenance and monitoring should form part of the substantive application.</p> <p>In summary, if the project is referred, detailed ecological surveys (including for aquatic fauna, avifauna, lizards, ornate snails, wetlands, streams and</p>

Section	Criteria	Comments
		other ecological values) should be done with methodologies and results provided in the substantive application. This will inform what wildlife approvals will be required for the project. It is noted that there are records of inanga (At-risk, Declining), giant bully (Naturally Uncommon) and long-fin eel (At-risk, Declining) within the vicinity of the site.
21(4)	Are there any other reasons not specified	DOC has not identified any other reasons why the project should not be referred.
21(5)(a)	Is the project inconsistent with: <ul style="list-style-type: none"> • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011. 	DOC has not identified any inconsistency with any relevant settlement or other obligation. Relevant Treaty Settlement Acts are: <ul style="list-style-type: none"> • Ngāti Toa Rangatira Claims Settlement Act 2014
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	DOC has not identified any reason why the wildlife approval identified should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	<p>Due to the scale of the project, DOC considers the project may have significant adverse effects on the ecological values anticipated to be present (noting that while highly modified, there are features such as wetlands on the site and records of inanga (At-risk, Declining), giant bully (Naturally Uncommon) and long-fin eel (At-risk, Declining) within the vicinity of the site).</p> <p>Based on our knowledge of the existing environment and species expected to occur on the site, our understanding of the project, and our experience of the kinds of design measures and conditions that could be implemented, DOC considers that once more detailed information is available, it would be possible to achieve a project with the imposition of conditions (that are appropriate, enforceable, include best management practice, and apply the relevant ecological management plans, where required), that does not have significant adverse effects on the environment.</p>

Section	Criteria	Comments
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	<p>DOC has not identified any issues with the Applicant's compliance history under the Wildlife Act 1953.</p> <p>It is noted that there are four abatement notices on record under the Resource Management Act 1991 in relation to other developments undertaken by the Applicant. A summary of these, together with two other formal warnings received have been set out within the Referral information (attachment 15) provided by the Applicant.</p>
21(5)(g)	Would a substantive application have any competing applications	No competing applications relating to wildlife approvals have been identified.
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	A Wildlife Act approval would generally take approximately three-four months to process, which is not significantly longer than the FTAA process is expected to take. However, there may be benefits for the Applicant in terms of consideration being combined with RMA approvals (rather than being advanced by a separate process) and given the different decision-making framework under the FTAA.
22(2)(a)(ix)	Will this project address significant environmental issues?	<p>No.</p> <p>The Referral Information records that the project will focus on resilience, biodiversity enhancement and sustainability. Key elements are noted as including a stormwater management system designed to achieve hydraulic neutrality and provide on-site treatment, improved biodiversity and carbon sequestration through planting and wetland restoration, and the use of energy-efficient design features to reduce overall energy consumption and associated greenhouse gas emissions. While notable, DOC does not consider these measures to address significant environmental issues.</p>
22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	<p>The following Statutory Planning documents are relevant to the project:</p> <ul style="list-style-type: none"> • Conservation General Policy 2005 • Wellington Conservation Management Strategy 2019 <p>The project is not inconsistent with the relevant statutory planning provisions. However, in preparing their substantive application the Applicant should consider:</p>

Section	Criteria	Comments
		<ul style="list-style-type: none"> • Conserving healthy freshwater ecosystems downstream of the site within the Waikanae River catchment; • Managing threatened and at-risk species that may be found on the site to ensure their persistence and disturbance is minimised; • Protecting freshwater ecosystems, fisheries, fish habitat and fish passage on site. <p>The project is likely inconsistent with the Operative Kapiti Coast District Plan 2021 as it is not currently zoned for residential development. DOC is aware that the Applicant is progressing a private plan change (Private Plan Change 4) which seeks to change the zoning of the site from 'Rural Lifestyle' to 'General Residential'.</p>
22(b)	Any other matters the Minister may consider as relevant?	There are wetlands located on the site, and the site is located in the Waikanae River catchment, which is a Nga Awa restoration site. The site will need to be managed so that it does not affect the Waikanae Estuary Scientific Reserve. Effects on the catchment, and in particular, the reserve should be considered further in the substantive application.

3 Other considerations

- 3.1.1 DOC has provided input to a number of fast-track projects to date where additional conservation approvals that would have been available under the FTAA have not been included in a substantive application. In some cases, it has been necessary for applicants to seek additional approvals via normal processing. This can result in inefficiencies, additional costs and undermining of the benefits of the 'one stop shop' approach of the FTAA.
- 3.1.2 DOC considers the Applicant should consider whether it should seek to include additional approvals that may be required for the project, and suggests the Minister consider whether further information should be sought from the applicant under section 20 before making their referral decision, to ensure all approvals in scope of the FTAA and necessary to implement the project are included in any referral notice.
- 3.1.3 DOC recommends consideration of whether any culverts to be installed as part of the project might require a complex freshwater fisheries activity approval, as highlighted to the Applicant in the Consultation Summary provided to the Applicant as part of pre-lodgement consultation.

UNCLASSIFIED

4 Matters for the Minister to specify (s27)

4.1.1 None identified.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 10th of February 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

By Fast-track Portal

4 February 2026

GW File No: PRE260019
EPA File No: FTAA-2511-1149

Minister for Infrastructure
C/O Whitney Nelson
Fast-track Applications
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Wellington 6140

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Te Aro, Wellington 6011
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Tēnā Koe

Comments on a referral application under section 17 of the Fast-track Approvals Act 2024: Otaihanga Retirement Village

Thank you for your letter dated 12 January 2026 inviting the Wellington Regional Council (Greater Wellington) to provide comments on the referral application under section 17 of the Fast-track Approvals Act 2024 (the Act) for the Otaihanga Retirement Village project (the application).

This letter sets out our comments on the application. Greater Wellington's comments are structured to address the matters that the Minister may consider when deciding on a referral application under section 22(2) of the Act (see Section 2 of this letter), and the matters that local authorities must comment on under section 17(3) of the Act (see Section 3 of this letter).

Before providing any comments on the proposal, Greater Wellington wishes to acknowledge mana whenua within the rohe where the project is located, including Te Ātiawa ki Whakarongotai Charitable Trust and Te Rūnanga o Toa Rangatira Incorporated. We understand that mana whenua will have been invited by the Minister to comment on the referral application and consider that the Minister should have particular regard to any comments provided by them in relation to this application. We also consider that the Minister should have particular regard to any iwi planning documents prepared by them that may be relevant to the application.

1. Summary

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. This purpose is reflected in the criteria for accepting a referral application under section 22 of the Act.

In summary, **Greater Wellington do not consider that the information contained in the application establishes that the project will have significant regional or national benefits**, when considered alongside the matters that may be considered when deciding on a referral application set out under section 22 of the Act. In particular:

- While the identified housing supply and economic benefits are not trivial, the information contained in the application does not establish the regional or national significance of the housing supply and economic benefits of the project;
- The project will not deliver any other regionally or nationally significant benefits (such as regionally significant infrastructure, climate change mitigation or adaptation measures, or addressing significant environmental issues);
- The project is not well aligned with regional planning documents. In particular:
 - The project is not identified as a priority development site or planned greenfield site in the [Future Development Strategy](#) for the region;
 - While the project is not inconsistent with the [Regional Policy Statement for the Wellington Region \(RPS\)](#), there are several matters that would need to be addressed by any substantive application to demonstrate that the project is consistent with the RPS;
 - The project, as described in the application, is unlikely to be consistent with objectives and policies for natural wetlands set out in the [Natural Resources Plan for the Wellington Region](#);
 - The project will not contribute to achieving Strategic Objective 1 (people in the Wellington Region have access to good, affordable travel choices) or Strategic Objective 2 (transport and land use are integrated to support compact urban form, liveable places and a strong regional economy) in the [Wellington Regional Land Transport Plan](#);
 - The [Wellington Regional Public Transport Plan](#) (and Long-term Plan) does not provide for any additional level of public transport service to support the development.

2. Comments on criteria for assessing a referral application (FTAA section 22(2))

This section sets out our comments on the application in relation to the matters that may be considered when deciding on a referral application under section 22(2) of the Act.

Section 22(2)(a)(i): Whether the project has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list

The project is not identified as a priority project in any regional planning document, including *Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054* (the regional Future Development Strategy).

Section 22(2)(a)(ii): Whether the project will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure

The project will not deliver any new regionally significant infrastructure (as defined in the Regional Policy Statement for the Wellington Region).

Section 22(2)(a)(iii): Whether the project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)

The application states that the project will increase the supply of housing by delivering 250 independent living units, 40 full-time care units, and 40 assisted living suites across the 12.56-hectare site. To provide regional context for this, we note that the 2023 regional Housing and Business Development Capacity Assessment¹ identifies that the region requires the development of an additional 99,302 residential units (with 13,888 of these being required in the Kāpiti Coast District) to meet estimated demand out to 2051. While we acknowledge that the project's contribution to housing supply is not trivial, the information contained in the application does not establish whether the project's contribution towards housing supply would be regionally or nationally significant.

With respect to Policy 1 of the National Policy Statement on Urban Development 2020 (NPS-UD), we do not consider that the project will contribute to a well-functioning urban environment. This is because the project is not located in an area that meets the definition of an urban environment as set out in the NPS-UD, as the site is located within a rural zone in the

¹ See: <https://wrlc.org.nz/assets/Documents/Documents/2025/09/HBA3-Draft-full-report-with-COVER-updated-16.02.24.pdf>

Operative Kāpiti Coast District Plan 2021.

Section 22(2)(a)(iv): Whether the project will deliver significant economic benefits

The application includes an Economic Impact Assessment (EIA)² that estimates the total additional gross economic output into the Wellington regional economy that would be facilitated by the project. The EIA estimates that:

- The total value added by the project to the Wellington regional economy will be \$132.1m over 7 years;
- The project would contribute around 319 full time equivalent jobs during the peak construction year³.

The EIA does not provide any analysis to demonstrate that the benefits of the project are significant in a regional context. In particular, the EIA does not identify how the estimated benefits relate to regional economic activity over the same period, and whether the economic benefits of the project are significant in this context. The EIA also does not identify the extent to which parts of the region will benefit economically.

While we acknowledge that the quantum of estimated economic benefits identified in the EIA are not trivial, we do not consider that the EIA demonstrates that the economic benefits of the project are significant in a regional or national context.

Section 22(2)(a)(v): Whether the project will support primary industries, including aquaculture

Not relevant to the project.

Section 22(2)(a)(vi): Whether the project will support development of natural resources, including minerals and petroleum

Not relevant to the project.

Section 22(2)(a)(vii): Whether the project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions

The application states that the project will incorporate “design, location, and operational efficiencies that contribute to the reduction of greenhouse gas emissions”. Key measures are identified as being the efficient use of existing infrastructure, low emissions building design and construction practices, landscaping and wetland restoration, and optimising the use of existing housing capacity.

² Property Economics (November 2025). *Summerset Otaihangā Project Fast-track Application Economic Impact Assessment*.

³ Property Economics (November 2025), p.16

While we acknowledge that design, location, and operational measures proposed for the project may result in a more emissions efficient development, they do not, of themselves, result in the reduction or removal of greenhouse gas emissions. Based on the information included in the application, aside from measures to mitigate its own effects, the project does not appear to involve any quantified or discernible reduction or removal of greenhouse gas emissions.

Section 22(2)(a)(viii): Whether the project will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards

The application identifies that the project will incorporate measures to address the risks to the project from natural hazards, with specific reference to flooding and liquefaction.

With respect to flooding, Greater Wellington's publicly available flood hazard model shows part of the project to be located within the 1% Annual Exceedance Probability (AEP) flood hazard (see Figure 1). The measures proposed by the applicant include hydraulic neutrality and on-site flood risk management. While these measures may result in any additional natural hazard risk associated with the development of the site being appropriately mitigated so that natural hazard risk is not increased, on their own they are unlikely to result in the overall reduction of risk arising from natural hazards. The application does not appear to include measures that would reduce natural hazard risk compared to the status quo.

On this basis, apart from measures to mitigate the project's own effects on natural hazard risk, we do not consider that the project would support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards.



Figure 1: Greater Wellington flood hazard model for Kāpiti, showing 1% AEP flood hazard (in green). Source: <https://experience.arcgis.com/experience/9729c62312a849749455ec862169a76f/page/Flood-hazard-areas>

Section 22(2)(a)(ix): Whether the project will address significant environmental issues

We are not aware of any significant environmental issues at the site that would be addressed by the project.

Section 22(2)(a)(ixa): Whether the project will promote competition in the grocery industry

Not relevant to the project.

Section 22(2)(a)(x): Whether the project is consistent with local or regional planning documents, including spatial strategies

The following regional statutory planning documents prepared under the Resource Management Act 1991 (RMA) are relevant to the application:

- Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054⁴
- Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1

⁴ See: <https://www.gw.govt.nz/assets/Documents/2025/08/1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf>

Appeals Version, September 2025)⁵

- Natural Resources Plan for the Wellington Region 2023⁶

In addition to this, the following regional strategic planning documents are also relevant to the proposal:

- Wellington Regional Land Transport Plan 2021: 2024 Mid-term Review⁷
- Wellington Regional Public Transport Plan 2025-2035⁸

The following sections provide an analysis of whether the application is consistent with these documents.

Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054

The site is on the boundary of the Paraparaumu urban area and is not in an area identified as priority development area in the Future Development Strategy (FDS) for the region.⁹ The site is also not identified as a planned greenfield site in the FDS.¹⁰ For context, over its 30-year life, the FDS envisaged 82% of all housing development to occur in existing urban areas, with 18% of housing development occurring in greenfield sites.

Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1 Appeals Version, September 2025)

There are several objectives and policies in the Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1 Appeals Version, September 2025) (RPS) that are relevant to the proposal. Overall, the project is not inconsistent with the RPS, however, further analysis against a number of objectives and policies would be required in a future application to assess consistency, particularly the following objectives and policies:

- Policy CC.9 (Reducing greenhouse gas emissions associated with subdivision, use or development): The proposal will not contribute positively to the Regional Land Transport Plan's strategic objectives (see further discussion below).
- Policy 40A (Loss of extent and values of natural inland wetlands): The proposed reclamation of natural inland wetlands is inconsistent with this policy. Policy 40A(c)(ii) requires that any loss of extent or values as a result of use and development in natural inland wetlands that is necessary for is necessary for the purpose of urban development

⁵ See: <https://www.gw.govt.nz/assets/Plans-policies-by-laws/RPS/RPS-Change-1-Appeals-Version-Sep-2025.pdf>

⁶ See: <https://www.gw.govt.nz/assets/Documents/2023/07/CORRECT-Natural-Resource-Plan-Operative-Version-2023-incl-maps-compressed.pdf>

⁷ See: <https://www.gw.govt.nz/assets/Documents/2024/07/Wellington-Regional-Land-Transport-Plan-2021-2024-Mid-Term-Review-2.pdf>

⁸ See: <https://www.gw.govt.nz/assets/Documents/2025/06/Wellington-Regional-Public-Transport-Plan-2025-web.pdf>

⁹ 1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf, Diagram 9, p.36.

¹⁰ 1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf, pp. 40-41.

that contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development 2020) does not occur on land that is zoned in a district plan as general rural, rural production, or rural lifestyle. The land is currently located in the rural lifestyle zone, and while a private plan change to change the zoning of the land has been publicly notified, it has not been heard or decided on.

- Policy 42 (Effects on freshwater and receiving environments from urban development): This policy applies to regional resource consents which relate to urban development, where the regional plan requirements or standards are not met. This policy requires a number of matters to be considered when considering an application for a regional resource consent. While the project proposes offsetting, any future application would be required to include detail illustrating how these matters have been considered.

Natural Resources Plan for the Wellington Region 2023 (NRP)

The Natural Resources Plan for the Wellington Region 2023 (NRP) is the region’s combined regional plan and regional coastal plan.

Based on the information contained in the application, the project is likely to require the following regional resource consents under the NRP:

Activity	Regional resource consents that may be required
Earthworks and the associated discharge of sediment and/or flocculant.	Land use consent and discharge permit under the NRP.
Vegetation clearance; land disturbance; earthworks; reclamation; taking, use, damming, or diversion of water; or discharge of water within or near a natural wetland/natural inland wetland	Land use consent, water permit, and discharge permit under the NRP. Regulations in the National Environmental Standards for Freshwater (NES-F) will also apply to the project. We note that wetland reclamation for the project is a prohibited activity under regulation 53 of the NES-F, because the site is in a rural zone under the Operative Kapiti Coast District Plan 2023.
Placement or construction of a river crossing structure, including any associated disturbance of the river bed, deposition on the river bed, diversion of water, discharge of sediment to water, and temporary damming of water.	Land use consent, water permit, and discharge permit under the NRP.
Discharge of stormwater into water, or onto into land where it may enter a surface water body or	Discharge permit under the NRP.

Activity	Regional resource consents that may be required
coastal water.	

Several objectives and policies in the NRP are relevant to these activities. An analysis of the application against the relevant objectives and policies of Natural Resources Plan for the Wellington Region 2023 (NRP) is set out in **Attachment 1**.

In summary, the project is unlikely to be consistent with several objectives and policies of the NRP. In particular:

- We consider that further engagement with mana whenua is necessary in order to ensure that the project is consistent the NRP’s objective to recognise kaitiakitanga and the active participation of mana whenua in decision-making (O13);
- The proposed reclamation of natural wetlands would be contrary to the objectives of the NRP that seek that the extent and values of natural wetlands are maintained or increased (Objective O22), unless the loss is appropriately offset (Policy P31).
- While the project considers offsetting, it is unlikely that the proposed approach to offsetting will be consistent with the policies and principles for offsetting set out in the NRP (Policy P31 and Schedule G2). The project proposes to use new stormwater and flood management wetlands to offset natural wetland loss. However, because these are likely to be engineered to provide for stormwater and flood management, it is unlikely that they will function as an equivalent replacement to the loss of existing natural wetlands.

In other matters, including bulk earthworks, stormwater management, and flooding, the application may be in accordance with provisions. We consider that sufficient information on these matters must be included in any future substantive application.

Wellington Regional Land Transport Plan

The proposal will not contribute positively to the Regional Land Transport Plan’s strategic objectives 1 (*People in the Wellington Region have access to good, affordable travel choices*) or 2 (*Transport and land use are integrated to support compact urban form, liveable places and a strong regional economy*) of the Regional Land Transport Plan 2021. The proposal is also inconsistent with Policy 2.3 of the Regional Land Transport Plan 2021- ‘*Ensure district plans consider how to facilitate and support housing and business development that enables better travel choices, including public transport nodes and corridors, to minimise dependence on private vehicles*’.

The key reason is that the location of the proposed retirement village does not provide future residents with access to good travel choice. Residents will be reliant on private vehicles (or, if

available, a shuttle service run by the retirement development) to access the shopping and services. Specifically:

- The closest bus stop is at least 700m away (further than the 400-500m that is considered an attractive easy walking distance to a bus stop for most people). (This is route 262, which runs between Paraparaumu Station and Paraparaumu Beach along Mazengarb Road at an approximately half-hourly frequency.)
- For the reasons set out above, it is unlikely that there will be a high use of the existing bus route by future residents at the site. This is a point acknowledged by the Integrated Transport Assessment (at p. 21).
- The site is not proximate to any retail, hospitality, health or social services. The closest retail and hospitality is located at Paraparaumu Beach or Paraparaumu Town Centre, while the closest health and social services are located at Paraparaumu Town Centre. As noted, the site is not readily connected to such services via public transport.
- The environment is not conducive to walking, particularly by those who are mobility-impaired, including due to: the higher speeds along the rural section of Ratanui Road, a footpath on one side only, and lack of safe crossings.
- Mazengarb Road is an extremely busy road, particularly at peak times. Pedestrian refuge crossing points (both existing at Mazengarb Rd and proposed as part of this application) are unlikely to be sufficient for mobility-impaired pedestrians.
- Potential for a new bus service along Ratanui Road in future is limited, regardless of demand from this site, by the very low-density rural lifestyle character of land use to north-east and south-east of the site.

Locations that are accessible to existing services and facilities, including public transport services, should be a key strategic consideration for future residential development, particularly intensive developments like this one where residents are less likely to be able to drive and are more dependent on walking and public transport.

Wellington Regional Public Transport Plan 2025-2035

Metlink is currently unable to commit to providing a public transport service for the retirement village due to funding constraints outlined in the [2024–2034 Long Term Plan](#), as well as the size and location of the development.

However, the Draft ITA outlines how the subdivision has been designed to connect with current active and public transport connections. As noted in the Draft ITA, ‘the Metlink Route 262 bus service travels along Mazengarb Road providing a connection between Paraparaumu

Beach and the Paraparaumu town centre. The service runs half hourly in each direction on weekdays, with more frequent buses during peak commuter times. Buses run hourly in each direction on weekends.’ (pg.8)

The Draft ITA notes that ‘the nearest bus route is on Mazengarb Road [on route 262] approximately 700m to the west of the Site. Given this distance and the limited frequency of the bus service on Mazengarb Road, it is considered that the bus service uptake from the development of the Site would be relatively low unless the frequency is increased to at least every 15 minutes. However, development of the Site will be able to be connected to the existing path network, as outlined above, to ensure that the Site is accessible by public transport.’ (pg.21)

Route 262 is designated as a ‘connector’ (PT4) service in the [Regional Public Transport Plan 2025-2035](#) “...these services provide coverage and enable access to essential services including education, employment and social. These are less frequent services provided across wider and less densely populated areas”. (pg.30)

We consider even with the Site being developed that this level of service would still be appropriate. It would still provide residents with the ability to connect with rail services at Paraparaumu Station should they need to access services outside of the Paraparaumu/Paraparaumu beach area.

The current service aligns with the [Regional Public Transport Plan 2025-2035](#)'s network design policy "...to provide feeder and connector services to primary public transport hubs and the rail network where the provision of a direct ‘point-to-point’ service is not feasible. Our policy is not to duplicate services through the provision of additional bus routes where high-capacity, frequent rail services are already available." (p.32)

We do note that not all residents in the eventual retirement village would be able to walk the 700m to and from the bus stop due to potential mobility issues. However, this is an issue that the developers may need to address through providing a potential shuttle service for their residents to use to access essential services in either Paraparaumu/Paraparaumu beach area rather than relying on Metlink altering existing bus routes or providing a new service.

3. Mandatory comments for local authorities (FTAA section 17(3))

This section sets out the comments that Greater Wellington is required to provide as a local authority under section 17(3) of the FTAA.

Section 17(3)(a): any applications that have been lodged with the local authority that would be competing applications if a substantive application for the project were lodged

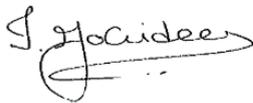
We have not identified any existing resource consent applications lodged with Greater Wellington that would be competing applications if a substantive application for the project were lodged.

Section 17(3)(b): in relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), any existing resource consents of the kind referred to in section 30(3)(a)

We have not identified any existing resource consents on or adjacent to the site of the kind referred to in section 30(3)(a) of the FTAA.

Please contact Katherine Greenaway at s 9(2)(a) should you have any questions about Greater Wellington's comments on the referral application.

Nāku noa, nā



Fathima Iftikar
Acting Group Manager Environment

Attachment 1: Natural Resources Plan for the Wellington Region

The following table provides comments on the consistency of the project with the relevant objectives and policies of Natural Resources Plan for the Wellington Region 2023 (NRP).

Natural Resources Plan for the Wellington Region 2023 (NRP)	
Relevant provision(s)	Consistency of the project with the provision
Objectives O12, O13 Policies P18, P20, P21	<p>These objectives and policies recognise the cultural relationship between Māori and air, land and water, recognise and provision for kaitiakitanga, and recognise the need to maintain the mauri of fresh and coastal waters.</p> <p>The applicant carried out engagement with mana whenua (Te Atiawa Ki Kapiti and Ngāti Toa Rangatira) in 2024 regarding zoning changes. Greater Wellington emphasises the importance of engaging with mana whenua in all stages of the proposal. Greater Wellington defers to the cultural impact assessment/s carried out by mana whenua. We consider ongoing engagement between the applicant and mana whenua is necessary to demonstrate that these provisions are met for any future substantive application.</p>
Objective O14	<p>This objective relates to ensuring the natural character of natural wetlands is preserved and protected from inappropriate use and development.</p> <p>The applicant proposes to reclaim on-site wetlands. The applicant considers reclamation is required to enable the construction of building platforms. It is not clear whether alternative approaches that avoid the loss have been considered.</p> <p>Loss of natural wetlands is not consistent with Objective O14, unless the loss is appropriately offset.</p>
Objective O15	<p>This objective relates to managing hazard risk on people and the environment.</p> <p>Parts of the site are subject to flooding risk. The applicant proposes to manage these via compensatory flood storage areas to manage flood risk up to a 1% AEP event. Provided the applicant continues to engage with Greater Wellington and can demonstrate flood hazards have been managed to an adequate level, they may be generally consistent with this objective.</p>
Objectives O17, O18, O19 Policies P9, P30, P31	<p>These objectives and policies relate to maintaining and improving the quality of surface water bodies, including for recreation and Māori customary use, with the aim of improving overall aquatic ecosystem health.</p> <p>The receiving environment of the site is the Waikanae River. The site is part of the Waikanae River catchment. Waikanae River is recognised as having</p>

Natural Resources Plan for the Wellington Region 2023 (NRP)	
Relevant provision(s)	Consistency of the project with the provision
	<p>significant indigenous biodiversity. In order for the proposal to be consistent with these provisions in relation to the Waikanae River, the applicant must propose adequate erosion and sediment controls suitable for the subject site to prevent sediment-laden discharge, and an adequate stormwater management system to prevent discharge of contaminants.</p> <p>The applicant proposes restoration of wetland areas not being reclaimed, as well as potential restoration of an on-site stream (although acknowledges limited ecological benefits from stream restoration). Restoration would improve the quality of these surface water bodies in question, and would at least maintain, and potentially improve, surface water quality for these waterbodies on site, in accordance with these provisions.</p>
<p>Objective O21 and O22 Policy P31</p>	<p>These objectives and policy relate to establishing, maintaining, and restoring natural wetlands, and maintaining or increasing the extent and value of natural wetlands.</p> <p>The applicant proposes to reclaim natural wetlands as part of the development. The applicant considers that proposed restoration could result in net gain for the indigenous biodiversity values of on-site natural wetlands. The applicant proposes to create a wetland to provide stormwater treatment, provide flood management, and to off-set reclamation. A wetland created for stormwater treatment and/or flood management does not provide for offsetting of lost ecological values due to reclamation. If the applicant intends on creating wetlands to provide services for the development, these must be in <i>addition</i> to the wetlands created or enhanced to offset wetland reclamation.</p> <p>These provisions seek that, if there is to be a loss of wetland extent or values, this must be offset so that there is no net loss, or a net gain .It is not certain that there will be a net gain on the basis that the proposed method of offsetting includes wetlands that are constructed for other purposes (to mitigate stormwater and flood hazard effects).</p>
<p>Objective O33, O37 Policy P107</p>	<p>This objective and policy seek that earthworks will use good management practise to minimise the risk of accelerated soil erosion, control silt and sediment runoff, and ensure the site is stabilised and relate to minimising the adverse effects on soil and water from land use activities.</p> <p>The applicant proposes to undertake bulk earthworks. The applicant has identified that staging, progressive stabilisation, and erosion and sediment controls are required to carry out works on-site. Provided the applicant continue to engage with Greater Wellington, the application will likely be consistent with these provisions. In particular, the applicant will need to</p>

Natural Resources Plan for the Wellington Region 2023 (NRP)	
Relevant provision(s)	Consistency of the project with the provision
	consider the presence of on-site waterbodies and need to protect these from sediment discharge during works.
Objective O38 Policies P83, P84	<p>These provisions relate to reducing the adverse effects of stormwater discharges and urban land uses over time and promotes discharges to land.</p> <p>The applicant has proposed stormwater management including infiltration and a stormwater treatment wetland. Provided the applicant demonstrates these management devices provide adequate treatment and hydrological control, the application will likely be consistent with this objective.</p>
Policy P65	<p>This policy relates to requirements under the National Policy Statement for Freshwater Management (NES-FM) with regard to discharge consents.</p> <p>The application must be consistent with the NES-FM to be consistent with this policy.</p>



Comments on a referral application under the Fast Track Approvals Act 2024

Otaihanga Retirement Village

Contact Details	
Organisation Name	Heritage New Zealand Pouhere Taonga (HNZPT)
Contact person	Ben Henson
Contact Number	+64 (04) 470 8053
Email	fasttrack@heritage.org.nz

General Comments

1. Summerset Villages (Paraparaumu) Limited (Applicant) has lodged an application for referral of the Otaihanga Retirement Village (project) under the Fast-track Approvals Act 2024 (the FTA Act).
2. In accordance with section 17(1)(c) of the FTA Act, Heritage New Zealand Pouhere Taonga (HNZPT) has been invited to comment on the referral application as the administering agency for the Heritage New Zealand Pouhere Taonga Act 2014.
3. HNZPT has been provided application documents that are relevant to the archaeological authority application and the resource consent application, insofar as it affects historic heritage. These have been assessed and HNZPT comments as follows:

Consultation and Engagement

4. A meeting was held with the applicant on 15 October 2025 to discuss the project and the future fast track application.

Archaeological Authority Application

5. The Applicant has provided a high-level archaeological assessment for a proposed private plan change that identifies no recorded archaeological sites within the project area, but the history and general nature of the project area indicate a risk of archaeological material, particularly midden, being encountered. Further detailed archaeological assessment will be required once development plans have been prepared for the Otaihanga Retirement Village. The additional assessment will determine the level of potential effects, and to recommend appropriate archaeological management and mitigation measures for the development. An archaeological authority should be in place for any earthworks, but the exact nature of any effects and mitigation is not known yet and will be based on further assessment.

Effects on Archaeological Values



6. In order to mitigate the adverse effects on archaeological values, a suite of conditions will be required. The conditions will be determined by subsequent assessment once the development details are known.
7. This has been discussed with the Applicant and will continue through the application process.

Resource Consent Application

8. The Applicant is also applying for a resource consent application which will generate adverse effects on historic heritage.
9. There are no Kāpiti Coast District Council scheduled sites or New Zealand Heritage List/Rārangi Kōrero sites on the subject property.

Effects on Historic Heritage Values

10. HNZPT will continue discussions with the Applicant in order to develop alternatives or conditions that will avoid, remedy, or mitigate any adverse effects on the historic heritage values.

Conclusion

11. If the project is referred, HNZPT anticipates further engagement with the Applicant to ensure all relevant documentation is provided with a substantive application, including:
 - A fulsome archaeological assessment;
 - Appropriate methodologies and strategies proposed;
 - Appropriate draft management plan and research strategy;
 - Evidence of appropriate consultation with tangata whenua; and
 - Appropriate proposed conditions.

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Otaihanga Retirement Village project
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
*Portfolio	Seniors		
*First name	Hon Casey		
*Last name	Costello		
Contact person (if different from above)			
*Contact phone number	+64 4 817 6827	Alternative	
*Email	c.costello@ministers.govt.nz		

2. Please provide your comments on this application
My comments are attached below.

Minister's signoff



Hon Casey Costello

Minister for Seniors

Date 29/1/2026.

Hon Casey Costello

Minister of Customs
Minister for Seniors
Associate Minister of Health
Associate Minister of Immigration
Associate Minister of Police



29 JAN 2026

Hon Chris Bishop,
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application: Otaihanga Retirement Village project, FTAA-2511-1149

Dear Chris,

Thank you for the opportunity to comment as Minister for Seniors on this application for referral under the Fast-track Approvals Act 2024 (the Act). I have considered whether this application is likely to 'increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)', under s22(2)(a)(iii) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

The following aspects of the project are likely to meet this criterion:

- The construction of a retirement village with approximately 250 independent living units, 40 assisted living suites, and 40 care suites.

Based on this information, the project is suitable for referral to the fast-track process. If the application is referred, I would welcome the opportunity to comment on the project in more detail.

Sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'C' followed by a horizontal line.

Hon Casey Costello

Minister for Seniors