APPENDIX 2
STATUTORY ASSESSMENT

CONTENTS

1.	KAPITI COAST DISTRICT COUNCIL RULES AND STANDARDS	2
2.	KAPITI COAST DISTRICT PLAN OBJECTIVES AND POLICIES	21
3.	NATURAL RESOURCES PLAN RULES AND STANDARDS	47
4.	NATURAL RESOURCES PLAN OBJECTIVES AND POLICIES	59
5.	NATIONAL ENVIRONMENTAL STANDARD FOR FRESHWATER REGULATIONS	76
6.	REGIONAL POLICY STATEMENT FOR THE WE OBJECTIVES AND POLICIES	82
7.	NATIONAL POLICY STATEMENT FOR URBAN DEVELOPMENT	99
8.	NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY	102
9.	NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT	104
10.	NATIONAL POLICY STATEMENT FOR NATURAL HAZARDS 2025	109
11.	NATIONAL POLICY STATEMENT FOR INFRASTRUCTURE 2025 (NPS-I)	110

1. KAPITI COAST DISTRICT COUNCIL RULES AND STANDARDS

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
METROPOLITAN CENTRE ZONE		
MCZ-R1 - Permitted	**Any activity that is a permitted activity under the rules in this chapter** Standards 1. Hours of operation for any activity adjoining or facing the Residential Zones shall be limited to between 7.00am and 11.00pm, 7 days a week. 2. The activity must not cause offensive or objectionable odour, dust or smoke at or beyond the boundary of the site on which it is occurring. 3. Light level from the activity must not exceed 10 lux, measured 1.5 metres inside the boundary of any adjoining Rural or Residential Zone. 4. Subject sites must be maintained so that they are clear of all rubbish, except waste materials which are temporarily stored pending disposal elsewhere, and all materials (including goods, machinery, vehicles, boxes, crates, pallets and waste material) must be stored in a neat and tidy manner. 5. Activities adjoining the Residential Zones and storage areas containing refuse, by-products or raw materials (unless fronting a service lane) must be screened by a 2 metre high close-boarded fence or shrubs or trees of an equivalent height.	The Proposal is intended to comply with the applicable permitted activity standards in MCZ-R1. While the final operators and tenants of the LFR and ground-floor commercial tenancies within the mixed-use and apartment buildings are not yet known, the operators of the three proposed drive-through activities have been identified. Irrespective of the final operators, the Applicant commits to compliance with the relevant operational standards of MCZ-R1, which will be secured through the Draft Consent Conditions. In particular: • Hours of operation for activities adjoining or facing Residential Zones will be limited to between 7.00am and 11.00pm; • Activities will comply with the specified odour, dust and smoke standard; • Lighting will comply with the applicable 10 lux limit at adjoining Residential or Rural Zone boundaries; • Sites and outdoor storage areas will be maintained in a neat and tidy condition; and • Screening will be provided where required by Standard 5. Accordingly, the Proposal will comply with MCZ-R1, subject to the proposed consent conditions.
MZC-R2 – Permitted	**Any activity which is not specified as a permitted, controlled, restricted discretionary, discretionary, non-complying activity in the rules in this chapter.** Standards: The activity complies with all permitted activity standards in this chapter.	**All proposed activities are provided for in the chapter and has therefore been assessed under the applicable rules and standards.**
MCZ-R5 – Permitted	**Commercial and Residential Activities in Precinct C** Standards: 1. Where residential activities (excluding visitor accommodation that is not temporary residential rental accommodation) are incorporated into a development that includes commercial activities they must be located above ground floor level or separated from all street frontages by commercial activities. 2. Residential activities (other than those incorporated into a development that includes retail or commercial activities) must meet the following standards (excluding visitor accommodation that is not temporary residential rental accommodation): a. comprise at least one residential unit (as measured by the residential unit measurement criteria); b. a ground floor habitable room must face the street in any residential building that fronts the street; c. residential buildings that front a street must have a main pedestrian 'front door' accessed from the street; d. garages, irrespective of access, must be recessed a minimum 1.0 metre behind the front façade of a residential buildings (irrespective of whether the front façade fronts a street, a common lane, a rear boundary, etc.);	**Does not comply – technical and specific infringements** For the purposes of this application, the Project as a whole has been treated as a single comprehensive development comprising a number of distinct neighbourhoods and activity areas, including residential, mixed-use, commercial and large format retail components. On this basis, because the overall development includes commercial activities, the ground-floor residential activities within the residential neighbourhoods do not comply with Standard 1, which requires residential activities incorporated into a development containing commercial activities to be located above ground-floor level or separated from all street frontages by commercial activities. This is considered a technical consequence of applying Standard 1 across the comprehensive development as a whole. The residential neighbourhoods are spatially and functionally distinct components of the wider development and are intentionally designed as residential areas rather than mixed-use development. The appropriateness of this arrangement, including the relationship between the residential neighbourhoods and the commercial and

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	e. the maximum height (above original ground level) of a front boundary fence, or any fence within the front yard, shall be 0.8 metres; f. building coverage must not exceed 50%. 3. Compliance with FC-Table 1	mixed-use components of the Project, is addressed in the Urban Design Statement. The proposal provides for a range of residential and commercial activities across Precinct C, consistent with the broader land use outcomes anticipated for the Metropolitan Centre. For completeness, the standalone residential typologies have also been assessed against the residential development standards in Standard 2. The proposal generally complies with these standards, including the requirements relating to residential units, habitable rooms addressing the street, pedestrian entrances and front boundary fencing. However: • some residential typologies do not achieve the 1.0 m garage recession required by Standard 2(d); and • some residential typologies exceed the maximum 50% building coverage specified by Standard 2(f). • The applicable financial contribution requirements under Standard 3 will be addressed through the KCDC financial contribution conditions included in the proposed conditions of consent. Accordingly, the proposed residential activities in Precinct C require **Restricted Discretionary** resource consent under MCZ-R11 being: *Any activity which is listed as a permitted activity or a controlled activity and does not comply with one of more of the associated standards, unless otherwise specifically stated.*
MCZ-R7 - Permitted	**Except within the Dune Protection Area identified on the Structure Plan in Appendix 19, new buildings and structures and additions and alterations to existing buildings and structures** Standards: 1. Height Buildings and structures must not exceed 21 metres in height. 2. Height in relation to boundary a. Buildings and structures must not project beyond a 60° recession plane measured from a point 8 metres vertically above ground level along all boundaries, as shown on the following diagram. 3. Outdoor living space Except as provided for under Rule MCZ-R3, a residential unit at ground floor level must have an outdoor living space that is at least 20 square metres and that comprises ground floor, balcony, patio, or roof terrace space that: a. where located at ground level, has no dimension less than 3 metres; and b. where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.8 metres; and c. is accessible from the residential unit; and d. may be: i. grouped cumulatively by area in 1 communally accessible location; or ii. located directly adjacent to the unit; and e. is free of buildings, parking spaces, and servicing and manoeuvring areas.	**Does not comply** The proposal has been assessed against the applicable building and development standards in MCZ-R7. Given the scale of the Project and the range of residential, mixed-use and commercial typologies proposed, compliance varies across the different development areas and building types. Detailed compliance is set out in the *Compliance Schedule* in **Appendix 6A** and assessed in the *Urban Design Statement.* In summary: • **Height:** Does not comply. Three buildings exceed the maximum permitted height of 21m: - Building M1 – 36.5m (15.5m infringement). - Building A4 – 29m (8m infringement). - Building A2 – 21.5m (0.5m infringement). • **Height in relation to boundary:** Does not comply. Three mixed-use buildings (M1, M3 and M8) infringe the recession plane requirements, together with apartment building A2 in relation to A1. The detached houses, duplexes and terrace houses within the residential precincts comply. • **Outdoor living space:** Does not comply. Six one-bedroom apartments within the Town Centre Precinct do not achieve the minimum outdoor living space requirements, with Juliet balconies proposed. All other residential units comply, including two three-bedroom apartments within M2 and M4 that achieve the required area through two balconies per unit.

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	RULE DETAIL	COMPLIANCE / COMMER
	4. Outdoor living space for residential units above ground level (i.e. above commercial units) a. is at least 8 square metres and has a minimum dimension of 1.8 metres; and b. is accessible from the residential unit; and c. may be: i. grouped cumulatively by area in 1 communally accessible location, in which case it may be located at ground level; or ii. located directly adjacent to the unit. 5. Outlook Space An outlook space must be provided for each residential unit as specified in this standard: a. An outlook space must be provided from habitable room windows as shown in the diagram below: b. The minimum dimensions for a required outlook space are as follows: i. a principal living room must have an outlook space with a minimum dimension of 4 metres in depth and 4 metres in width; and ii. all other habitable rooms must have an outlook space with a minimum dimension of 1 metre in depth and 1 metre in width. c. The width of the outlook space is measured from the centre point of the largest window on the building face to which it applies. d. Outlook spaces may be over driveways and footpaths within the site or over a public street or other public open space. e. Outlook spaces may overlap where they are on the same wall plane in the case of a multi-storey building. f. Outlook spaces may be under or over a balcony. g. Outlook spaces required from different rooms within the same building may overlap. h. Outlook spaces must: i. be clear and unobstructed by buildings; and ii. not extend over an outlook space or outdoor living space required by another dwelling. .... 10. Other Standards – commercial façade glazing In Precinct C, buildings for commercial uses must contain at least 50% of the ground level road boundary façade and facades on desired connector roads as active frontages, including pedestrian entrances and clear glass with views to activities in the building. 11. Other standards – front yard landscaping Any building or structure which is setback 2 or more metres from the road boundary must provide (or, in respect of existing trees, retain) at least one specimen tree capable of growing to 5 metres in height within 10 years of planting for every 10 metres of site frontage. Any landscaping provided in accordance with this standard must be included in the landscaping car park requirement. 12. Other standards – lighting All buildings, other than temporary or accessory storage buildings, must be lit with exterior lighting at pedestrian entrance areas at a minimum of 10 lux. 13. Other standards – verandahs In Precinct A, Precinct B, and Precinct C along frontage to main pedestrian routes, verandahs shall be provided to the following standards, except in situations where the adjoining buildings on both sides do not have a verandah (excluding roads fronting the Wharemauku Stream reserve where all buildings must provide a	• **Outlook space:** Complies. All residential units achieve the required outlook spaces from habitable room windows. • **Commercial façade glazing / active frontage:** Compliance is to be confirmed through detailed design. The proposed Town Centre buildings incorporate ground-floor commercial activities, glazing and pedestrian entrances addressing the principal streets and public spaces and have been designed to comply with this standard. The final façade design for the mixed-use and large format retail buildings will be subject to the proposed detailed design certification process, including confirmation of compliance with the minimum 50% active frontage requirement. • **Front yard landscaping:** Compliance is to be confirmed through detailed design. The proposed landscape plans incorporate trees, planted setbacks and landscaped buffers. Urban Acumen confirms that the landscaping requirements can readily be achieved within the large format retail precinct, including along Kāpiti Road. The final detailed landscape plans will confirm the required specimen-tree provision for applicable frontages. To avoid compliance issues in the future detailed design process, the mixed-use buildings have been assumed to not comply with this standard. • **Lighting:** Compliance is assumed, as all buildings will incorporate external lighting and/or security lighting at pedestrian entrances. It is anticipated that this lighting will achieve the minimum 10 lux requirement. • **Verandahs:** Generally complies where applicable. All M buildings incorporate verandahs with a minimum depth of 3m. Building A1 is set back more than 3m and incorporates upper-floor balconies providing a verandah effect. Verandahs are not proposed within the large format retail or residential precincts, where Urban Acumen does not consider the requirement applicable. However, this represents a technical infringement to this standard. • **Building setbacks – Precinct C:** Does not comply. Buildings M1 and A4 incorporate setbacks outside the prescribed less-than-2m or greater-than-10m requirements. Buildings within the large format retail precinct are also set back from the road boundary to accommodate parking, vehicle circulation and landscaping. The residential precincts generally incorporate landscaped front yards of approximately 1.5m. • **Maximum block length:** Does not fully comply. The large format retail precinct generally complies with the maximum 150m block length requirement, although minor infringements are identified. The Town Centre Precinct complies through the provision of a pedestrian right-of-way through the block. The residential precincts incorporate public routes and rights-of-way to provide pedestrian permeability. • **Vehicle access to Kāpiti Road:** Complies. No vehicle entrances to car parking or loading areas are proposed directly from Kāpiti Road, with vehicle access provided through the internal

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	verandah) and where the building is set back from the frontage by more than 3 metres: a. The verandah shall have a minimum depth of 3 metres; and b. The verandah shall be at least 0.5 metres behind the kerb face. 14. Verandahs must extend along the entire frontage of the building and shall adjoin existing verandahs on adjacent buildings. 15. Verandahs must have exterior lighting at pedestrian entrance areas at a minimum of 10 lux. ….. 18. In Precinct C, buildings and structures shall be set back less than 2 metres from the legal road boundary or main internal pedestrian route edge, or shall be set back more than 10 metres where the setback is not used for vehicle access and parking. Any setback less than 2 metres must be entirely paved for pedestrian circulation (except for ancillary landscaping). This rule does not apply to ancillary buildings and structures; that is buildings and structures used for a purpose which is secondary to the main use of the subject site, provided that the ancillary buildings are located to the rear of the main building on the subject site. 19. The maximum block length of the development shall be 150 metres. For the purposes of this standard, the maximum block length shall also apply to any internal roading proposed. 2.0 No vehicle entrances to car parking or loading areas shall be located: b. on Kāpiti Road in Precinct C.	road network. The existing Brett Ambler Way access to Kapiti Road is proposed to be utilised for servicing movements associated with the LFR fronting Kapiti Road. Accordingly, the Proposal does not fully comply with MCZ-R7, with identified infringements relating to building height, height in relation to boundary, outdoor living space, building setbacks and maximum block length. Therefore, **Discretionary Activity** resource consent is required under Rule MCZ-R17: *Discretionary - MCZ-R17- 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.*
MCZ-R8 – Permitted	**Construction of roads (including necessary earthworks) identified in the Structure Plan in Appendix 19.** Standards – N/A Note: All roads and associated infrastructure must be constructed to the standards specified in the Transport chapter and comply with the NH-FLOOD rules when located in a flood hazard area.	**Does Not Comply** The proposal includes construction of the Town Centre Link Road and other roads and connections generally anticipated by the Metropolitan Centre Zone Structure Plan. MCZ-R8 provides for the construction of roads identified on the Structure Plan as a permitted activity, subject to all roads and associated infrastructure being constructed in accordance with the applicable standards of the Transport chapter. As assessed in the *Integrated Transport Assessment*, the proposed roading and access arrangements do not achieve full compliance with all applicable Transport chapter standards. Identified infringements include aspects of vehicle access width, separation of vehicle crossings from intersections, sight-distance requirements, and the provision of dedicated cycle facilities on all new roads. Accordingly, the proposed road construction does not qualify as a permitted activity under MCZ-R8. **Restricted Discretionary Activity** resource consent is therefore required under Rule MCZ-R12, being: *Any activity which is listed as a permitted activity or a controlled activity and does not comply with one of more of the associated standards, unless otherwise specifically stated.*
MCZ-R10 – Permitted	**Trade supply retail, home improvement retail, yard based retail, food and beverage outlets, retail outlets selling convenience goods but not comparison goods and service stations in Precinct C.** Measurement criteria apply to activities under this rule Standards 1. Food and beverage outlets shall have a maximum gross floor area (including any outdoor seating areas) of 300m2. 2. Retail outlets selling convenience goods but not comparison goods shall have a maximum gross floor area or retail display area of 150m2. Measurement Criteria:	**Does not comply** The three proposed drive-through food and beverage outlets have indicative building floor areas of approximately 200m² for Starbucks and 250m² for Burger King and Popeyes. The proposed apartment and mixed-use buildings also incorporate ground-floor retail and commercial tenancies. The architectural plans identify individual tenancy areas ranging from approximately 64.6m² to 198m². While these are individually below the 300m² maximum GFA for food and beverage outlets, several

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	When measuring gross floor area, include: covered yards and areas covered by a roof but not enclosed by walls Exclude: a. uncovered stairways; b. floor space in terraces (open or roofed), external balconies, breezeways or porches; c. roof car parking, lift towers and machinery rooms on the roof having a floor area of not more than 200m²; d. car parking areas; and e. floor space of interior balconies and mezzanines not used by the public.	exceed the 150m² maximum applicable to convenience retail activities. The final tenant mix and configuration of the retail and commercial spaces have not yet been confirmed. Accordingly, flexibility is sought to accommodate different food and beverage and retail activities, including the potential amalgamation of adjoining tenancies, which may result in the permitted GFA thresholds being exceeded. The overall scale and distribution of retail and commercial activities have been assessed as part of the proposed development envelope. Accordingly, **Restricted Discretionary Activity** resource consent is required under Rule MCZ-R12, being: *Any activity which is listed as a permitted activity or a controlled activity and does not comply with one of more of the associated standards, unless otherwise specifically stated.*
MCZ-R14 – Restricted Discretionary Activity	**Large Format retail activities in Precinct C that are not permitted by MCZ-R10.** Standards 1. The building for the retail activity must meet the permitted activity standards for buildings in Precinct C in MCZ-R7. 2. The activity must be consistent with the Structure Plan in Appendix 19. **3.** Department Stores shall be limited to one department store, which may include grocery and other retailing, within a single premise which must have a minimum gross floor area of 3,000m² and the store or brand must not be in the District. *Matters of Discretion:* *Location, layout, size and design of the proposed development.* *The relevant matters in the Centres Design Guide in Appendix 25 and the Land Development Minimum Requirements.* *Visual, character, amenity, historic heritage and streetscape effects.* *Traffic and transport effects.* *Effects on the vitality and viability of the Metropolitan Centre Zone*	**Does not comply** The proposal includes large format retail activities within Precinct C that are provided for as a Restricted Discretionary Activity under MCZ-R14. The proposed LFR development does not fully comply with the permitted building standards in MCZ-R7, including the identified building and development standard infringements. Accordingly, Standard 1 is not met. The proposal is generally consistent with the overall outcomes sought by the Structure Plan, including the provision of commercial and retail activities within Precinct C, the Town Centre Link Road and an integrated movement and open space network. However, the proposal departs from aspects of the indicative Structure Plan, including the configuration of development and modification of the identified dune landforms. On that basis, compliance with Standard 2 is not relied upon. No department store is proposed and Standard 3 is not applicable. Accordingly, **Discretionary Activity** resource consent is required under Rule MCZ-R17 being: *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.*
MCZ-R15 – Restricted Discretionary	**Earthworks, new buildings and structures and additions and alterations to existing buildings and structure in the Dune Protection Area identified in the Structure Plan in Appendix 19.** 1. The activity must comply with the following standards listed in the following permitted activity rules: MCZ-R1 (Standards 1 to 5 inclusive) MCZ-R5 (Standards 1 to 4 inclusive) MCZ-R6 (Standard 1) MCZ-R7 (Standards 1 to 5 inclusive, 10 to 16 inclusive and 18 to 20 inclusive) MCZ-R9 (Standard 1)	**Does not comply** The proposal includes earthworks, buildings and structures within the Dune Protection Area identified in the Structure Plan. As assessed above, the proposal does not comply with all of the applicable standards referenced by MCZ-R15, including relevant standards in MCZ-R5 and MCZ-R7. Accordingly, **Discretionary Activity** resource consent is required under Rule MCZ-R17 being: *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.*

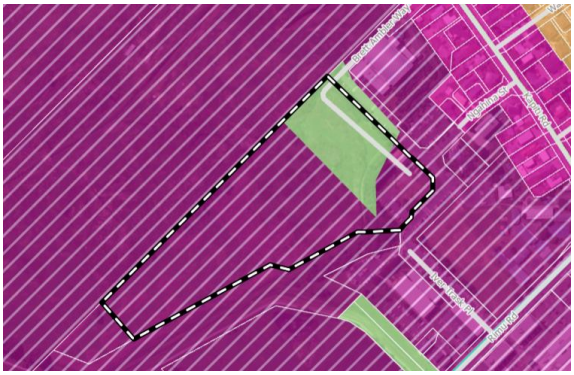
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RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
MCZ-R16 – Restricted Discretionary	**Buildings and structures or earthworks in the indicative Stormwater Management Area on the Metropolitan Centre Structure Plan.** Standards 1. All buildings and structures must comply with the standards in MCZ-R7	**Does not comply** The proposal includes buildings, structures and earthworks within the indicative Stormwater Management Area identified on the Metropolitan Centre Structure Plan. As assessed under MCZ-R7 above, the proposed buildings and structures do not comply with all of the applicable permitted activity standards referenced by MCZ-R16. Accordingly, Standard 1 is not met. The proposed development of this area, including the integrated stormwater, flood management and wetland response, is assessed in the relevant technical reports accompanying the application. Accordingly, **Discretionary Activity** resource consent is required under Rule MCZ-R17 being: *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.*
OPEN SPACE ZONE A small portion of the KCDC-owned land at 1 Brett Ambler Way is zoned Open Space. Earthworks and a short section of the proposed Iver Trask Place extension (Road 3) are located within this area. No buildings or other built development are proposed within the Open Space Zone. Neither earthworks nor the construction of a road are specifically regulated activities under the Open Space Zone provisions. Accordingly, these activities fall within OSZ-R2, which provides for activities not otherwise specified in the Open Space Zone rules as permitted activities, subject to compliance with the relevant permitted activity standards. The earthworks and proposed road extension are separately assessed against the relevant district-wide Earthworks, Transport and Infrastructure provisions below. No additional resource consent is required under the Open Space Zone provisions. 		
SUBDIVISION – DISTRICT WIDE		
SUB-DW-R1 – Controlled	Subdivision to create an allotment for network utility purposes (including allotments required for renewable electricity generation activities). 1. There shall be no minimum area requirements for allotments for network utility purposes of network utility providers. 2. Each allotment must have inalienable legal and physical access to a legal road.	**Complies** Resource consent requirement for a **Controlled Activity** under SUB-DW-R1.
SUB-DW-R7 – Restricted Discretionary	Subdivision where any part of the land contains flood storage, ponding, residual ponding or shallow surface flow areas. Standards: 1. Each vacant allotment shall have a building area located outside any river or stream corridor, overflow path or residual overflow path. 2. The building area for each vacant allotment shall be located above the estimated 1% AEP flood event level. 3. Formed vehicle access does not adversely affect the 1% AEP flood hazard risk on other properties in the same flood catchment. 4. Compliance with all other relevant subdivision rules and standards in other chapters.	**Does not comply** Compliance is not achieved with standard (4). Resource consent requirement for a **Discretionary Activity** under SUB-DW-R15.

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RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
SUB-DW-R9 – Controlled	Subdivision (excluding boundary adjustments or subdivision of land where no additional allotments are created) of land with peat or sand soils. Standards: 1. Geotechnical information must be provided by a suitably qualified and experienced person (to building consent level) on liquefaction risk. Notification: Public and limited notification of an application for resource consent under this rule is precluded.	**Complies** The Geotechnical Assessment Report prepared by Torlesse Ltd (**Appendix 17**) provides a site-specific liquefaction assessment. Section 6.1 and Table 12 confirm that the assessment meets the Level C requirements of the MBIE liquefaction guidance. Resource consent requirement for a **Controlled Activity** under SUB-DW-R9.
SUB-DW-R17 – Discretionary	Subdivision of land located partly within the river corridor or stream corridor where each allotment has building areas which are: 1. located outside any river or stream corridor, overflow path or residual overflow path; and 2. located above the estimated 1% AEP flood event level. 3. formed vehicle access which does not adversely affect the flood hazard risk on other properties in the same flood catchment.	Resource consent requirement for a **Discretionary Activity** under Rule SUB-DW-R17.
SUBDIVISION IN WORKING ZONES		
SUB-WORK-R39 – Controlled	Except as provided for under Rule SUB-WORK-R33, the subdivision of land within the Metropolitan Centre Zone structure plan area that is consistent with the structure plan in Appendix 19. Standards: 1. Each allotment must have legal and physical access to a legal road. 2. Each allotment, including any balance area must be able to accommodate a building which complies with the permitted activity standards in Rule MCZ-R7. 3. Each allotment must have a flood free building area above the estimated 1% Annual Exceedence Probability flood event. 4. Public roads, public water supply, wastewater and stormwater systems must be available to serve the subdivision. 5. A development plan showing indicative buildings (excluding minor buildings) and landscaping must be provided. 6. The maximum block length of the development shall be 150 metres. For the purposes of this standard, the maximum block length shall also apply to any internal roading proposed. 7. For sites adjoining Residential Zones, development must meet the permitted activity standards of the adjoining Residential Zone for building separation, setbacks and screening. 8. The Esplanade Reserve and Esplanade Strip provisions of SUB-DW-Table 1 must be complied with. 9. Compliance with FC-Table 1.	**Does not comply** The proposed subdivision is generally consistent with the overall outcomes and intent of the Metropolitan Centre Structure Plan, including the establishment of the Town Centre Link Road, an integrated movement network, provision for residential and commercial development within Precinct C, and provision for stormwater management and open space. However, the proposed subdivision does not replicate all elements of the indicative Structure Plan, including the detailed configuration of development, modification of the identified dune landforms and configuration of the stormwater management area. Accordingly, the proposal does not rely on the controlled activity pathway under SUB-WORK-R39. In addition, the subdivision does not comply with all of the associated standards, including Standard 2, as some proposed development does not comply with the permitted building standards in MCZ-R7. Accordingly, the proposal must be assessed against SUB-WORK-R40. Refer assessment below.
SUB-WORK-R40 – Restricted Discretionary	Any subdivision of land in the Metropolitan Centre Zone which is not a controlled activity under SUB-WORK-R33 or SUB-WORK-R39. 1. Each allotment must have legal and physical access to a legal road. 2. Each allotment, including any balance area, must be able to accommodate a building (excluding minor buildings) which complies with the permitted activity standards in MCZ-R7 (except for standard 1), and the restricted discretionary activity standard for height under Rule MCZ-R13. 3. Public roads, public water supply, wastewater and stormwater systems must be available to serve the subdivision. 4. A development plan showing indicative buildings (excluding minor buildings) and landscaping must be provided. 5. The Esplanade Reserve and Esplanade Strip provisions of SUB-DW-Table 1 must be complied with.	**Does not comply** The subdivision generally complies with the applicable standards, with legal and physical access provided to proposed allotments, public infrastructure available to serve the development, and a comprehensive development plan showing the proposed buildings and landscaping provided as part of the application. However, the subdivision does not comply with all of the applicable standards. In particular, some proposed buildings infringe the standards in MCZ-R7, such that not all allotments are demonstrated to be capable of accommodating a building complying with the relevant MCZ-R7 standards (excluding the permitted height standard). Accordingly, **Discretionary Activity** resource consent is required under SUB-WORK-R48: *Any activity which is listed as a restricted discretionary activity and does not comply with one or*

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		more of the associated standards, unless otherwise specifically stated.
NOISE		
NOISE-R3 – Permitted	Noise from activities located within the Local Centre, Town Centre, Metropolitan Centre and Hospital Zones. Standards 1. Excluding the activities provided for in Rules NOISE-R8 to NOISE-R15, noise emission levels (excluding fixed plant) must comply with the limits in NOISE-Table 3. 2. Compliance locations in Rural Zones shall be at the notional boundary of any residential unit (excluding visitor accommodation which is not temporary residential rental accommodation). 3. Noise measurements must be undertaken in accordance with the procedures set out in NZS6801:2008 Acoustics - Measurement of Environmental Sound and must be assessed in accordance with NZS6802:2008 Acoustics – Environmental Noise. 4. The following activities are exempt from standard 1 above: a) any residential activity (excluding visitor accommodation which is not temporary residential rental accommodation) including non-commercial private gatherings, spontaneous social activities and non-commercial children's play; b) any warning device used by emergency services for emergency purposes; c) noise from fixed plant that is used solely for emergency purposes. Examples of such equipment are alarms, standby generator sets that are used to supply electricity only at times of electrical supply failure, or for plant used only during life threatening situations such as smoke fans or sprinkler pumps and is not used to generate power for the national grid; and d) vehicles on public roads or trains on rail lines, including at railway yards, railway sidings or stations and level crossing warning devices.	**Will Comply** Activities within the Metropolitan Centre Zone will be operated and managed to comply with the applicable noise limits in NOISE-Table 3. Compliance will be determined in accordance with NZS 6801:2008 and NZS 6802:2008.
NOISE-R4 – Permitted	Noise from fixed plant located within the Local Centre, Town Centre, Metropolitan Centre and Hospital Zones. Standards 1. Excluding the activities provided for in Rules NOISE-R8 to NOISE-R15, noise emission levels must comply with the limits in NOISE-Table 4. 2. Compliance locations in Rural Zones shall be at the notional boundary of any residential unit excluding visitor accommodation which is not temporary residential rental accommodation). 3. Noise measurements must be undertaken in accordance with the procedures set out in NZS6801:2008 Acoustics - Measurement of Environmental Sound and must be assessed in accordance with NZS6802:2008 Acoustics – Environmental Noise. 4. The following activities are exempt from standard 1 above: a. any residential activity (excluding visitor accommodation which is not temporary residential rental accommodation) including non-commercial private gatherings, spontaneous social activities and non-commercial children's play; b. any warning device used by emergency services for emergency purposes; c. noise from fixed plant that is used solely for emergency purposes. Examples of such equipment are alarms, standby generator sets that are used to supply electricity only at times of electrical supply failure, or for plant used only during life threatening situations such as smoke fans or sprinkler pumps and is not used to generate power for the national grid; and	**Will Comply** Noise from fixed plant associated with activities within the Metropolitan Centre Zone will be designed and operated to comply with the applicable noise limits in NOISE-Table 4. Compliance will be determined in accordance with NZS 6801:2008 and NZS 6802:2008.

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RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
	d. vehicles on public roads or trains on rail lines, including at railway yards, railway sidings or stations and level crossing warning devices.	
NOISE-R10 – Permitted	Noise from activities associated with construction or demolition. Standards 1. Construction noise must be measured and assessed in accordance with, and must comply with, NZS 6803:1999 Acoustics – Construction Noise.	**Will Comply** Construction noise will be measured and assessed in accordance with, and will comply with, NZS 6803:1999 Acoustics – Construction Noise. Compliance is secured through the proposed construction noise conditions, including specified construction noise limits and the requirement for a certified Construction Noise Management Plan.
NOISE-R14 – Permitted	Noise sensitive activities Standards 1. Any new or altered habitable room within a building that houses any noise sensitive activity (including rooms used for hospital recovery; but excluding rooms used for visitor accommodation, which is not temporary residential rental accommodation, outside of residential zones) on a subject site within any of the following: a. the area between the air noise boundary and the outer control boundary of the Kāpiti Coast Airport; b. Hospital Zone; c. any Centres Zone; d. General Industrial Zone; e. within 100m of the boundary of a designation for rail corridor purposes; and f. greater than 40m, and not greater than 80m, from the nearest edge of the carriageway of transportation noise effect route; must be protected from noise arising from outside the building by ensuring the external sound insulation level of the room achieves a performance standard of not less than D2m,nT,w + Ctr > 30 dB. Compliance with standard 1 above shall be achieved by either: i. a statement by Licensed Building Practitioner that the construction of the external building elements of the new or altered habitable room conform with NOISE-Table 8 and that ventilation of these rooms conforms with the requirements of standard 4 below; or ii. constructing the habitable room in accordance with an acoustic design certificate prepared by an acoustic engineer acceptable to Council that describes the proposed design of the building that will achieve compliance with the specified performance standard for sound insulation with a ventilation system installed as required under standard 4 below; or iii. providing an acoustic design certificate prepared by an acoustic engineer acceptable to Council stating the outdoor free-field noise level at the most affected exterior wall of the building containing the habitable room will be unlikely to exceed; 55 dB LAeq(1hr) for rail traffic noise 57 dB LAeq(24hr) for road traffic noise. 2. Any new or altered habitable room within a building that houses any noise sensitive activity (including rooms used for hospital recovery; but excluding rooms used for visitor accommodation, which is not temporary residential rental accommodation, outside of residential zones) on a subject site within 40m of the nearest edge of the carriageway of any formed State Highway, or any transport corridor designated for State Highway purposes that has yet to be formed, must be protected from noise arising from outside the building by ensuring the external sound insulation level of the room achieves a performance standard of not less than D2m,nT,w + Ctr > 35 dB. Compliance with standard 2) above shall be achieved by either: a. constructing the habitable room in accordance with an acoustic design certificate prepared by an acoustic engineer acceptable	**Will Comply** New habitable rooms will be designed and constructed to achieve the applicable external sound insulation requirements of NOISE-R14. Compliance will be demonstrated through one of the methods specified in NOISE-R14, including the required ventilation provisions where applicable. These requirements are set out in the *KCDC Draft Conditions.*

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
	to Council that describes the proposed design of the building that will achieve compliance with the specified performance standards for sound insulation with a ventilation system installed as required under standard 4 below; or b. providing an acoustic design certificate prepared by an acoustic engineer acceptable to Council stating the outdoor noise level at the most affected exterior of the building containing the habitable room will be unlikely to exceed: 57 dB LAeq(24hr) for road traffic noise. 3. For any designated corridor that has yet to be formed, the location of the nearest edge of the carriageway shall be deemed to be as indicated on the drawings referenced in the designation conditions or an approved Outline Plan, whichever is the latest, or 5m inside the designation boundary if there are no such drawings or approved Outline Plan. 4. Where habitable rooms required to be insulated under standards 1 or 2 contain operable windows, a ventilation system must also be installed. This ventilation system must: a. achieve the requirements of Section G4 – Ventilation of the New Zealand Building Code 2011, and, while meeting this minimum requirement, the sound of the system must not exceed 30 dB LAeq(30s) when measured 1m away from any grille or diffuser; and b. provide ventilation at incremental rates controlled by the occupant up to a high air flow setting that provides at least 6 air changes per hour, and, while meeting this requirement, the sound of the system must not exceed 35 dB LAeq(30s) when measured 1m away from any grille or diffuser; and c. provide cooling that is controlled by the occupant and can maintain the temperature at no greater than 25oC; and d. result in air pressure inside the habitable room that is no more than 10Pa above ambient external air pressure. Note: for the purposes of this rule, the term 'altered habitable room' means any habitable room that is (or is proposed to be) expanded in floor area by 10% or more, or involves the fitting of new or replacement windows in external walls with an area more than 5% of the floor area of the room.	
INFRASTRUCTURE		
INF-PNU-R5 – Permitted	The development and installation of any new network utility, except for electricity transmission lines above 110kV; or gas distribution and transmission pipelines at a pressure exceeding 2000 kilopascals, provided that they are not located within: 1. an ecological site; 2. a well-defined fault avoidance area; 3. a well-defined extension fault avoidance area; 4. an open space (conservation and scenic) zone; 5. an outstanding natural features and landscapes; 6. a river corridor; 7. a stream corridor; 8. a ponding area; 9. a shallow surface flow area; 10. an overflow path; 11. a residual overflow path; or 12. a site containing a historic heritage area, building, structure or place identified in Schedules 7, 8 or 9; unless otherwise provided for under permitted activity Rules INF-PNU-R6, INF- PNU-R8, INF-PNU-R9, INF-PNU-R10, INF-PNU-R11 and INF-PNU-R12.	**Does not comply** The Proposal includes the installation of new network utilities within areas mapped as Stream Corridor and Ponding Area under the District Plan. Therefore, compliance with clauses 7) and 8) of this standard are not achieved. However, the proposed flood management works will establish a dedicated flood storage area, where no network utilities are proposed. Accordingly, while some network utilities will be located within the mapped hazard areas, these will be accommodated outside the proposed flood storage area. Resource consent is therefore required for a **Restricted Discretionary Activity** under Rule INF-PNU-R13.

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
INF-PNU-R18 – Restricted Discretionary Activity	New aboveground network utilities within any ponding area, shallow surface flow area, overflow path or residual overflow path, which are above ground, other than telecommunications and radiocommunications. Standards: 1. Must comply with the relevant permitted and controlled activity standards for the network utility.	Consent requirement based on existing mapped flooding areas. Resource consent requirement for a **Discretionary Activity** under Rule INF-PNU-R22.
INF-MENU-R28 – Permitted	Any new and relocated residential buildings on land where potable public water supply is available. Standards: 1. All new or relocated residential buildings where potable public water supply is available to a residential building must be fitted with one of the following: a. rainwater storage tanks with a minimum capacity of 10,000 litres for the supply of non- potable water for outdoor uses and indoor toilets; or b. rainwater storage tanks with a minimum capacity of 4,000 litres for the supply of non-potable water for outdoor areas and indoor toilets, and a greywater re-use system for outdoor irrigation. The greywater re-use system shall re-use all water from bathrooms (excluding toilets) and laundry washing machines. 2. The greywater re-use system must be installed so that: a. there is automatic diversion to sewer to cover heavy rainfall and ponding; b. there are safe setback distances from property boundaries and private bores; c. the device uses water from a single residential building only; d. the irrigation shall be sub-surface and suited to the soil type and slopes; e. the greywater is not stored in any way, or treated other than primary screening or filtration; f. the diversion device has a switching or selection facility so that greywater can be easily diverted back to sewer; g. some form of non-storage surge attenuation is installed as part of the diversion system;	**Does not comply** The Proposal does not incorporate the rainwater storage tanks required by Rule INF-MENU-R28. Instead, stormwater runoff will be managed through the integrated stormwater management system described in the *Stormwater Management Plan*. The plan identifies that the development can achieve hydraulic neutrality through a combination of stormwater attenuation and soakage measures, supported by bioretention rain gardens and the wider flood management system. The proposed approach also incorporates passive infiltration where practicable to support groundwater recharge and maintain stream baseflows. Resource consent is therefore required for a **Restricted Discretionary Activity** under Rule INF-MENU-R35.
TRANSPORT		
TR-R2 – Permitted	**Vehicle movements** Standards: 1. Up to 200 vpd in the Working Zones, except: a. where all public vehicle access is onto strategic arterial routes or major community connector routes any activity must not generate more than 100 vpd. This excludes Precincts A1, A2 and C which are managed in standards 1 b) and 1 c) below; b. any activity in Precincts A1 and A2 in the Metropolitan Centre Zone must not generate more than 200 vehicle movements in any hour; c. any activity in Precinct C in the Metropolitan Centre Zone must not generate more than 50 vehicle movements in any hour; d. any retail activity within the Ihakara Street West Precinct and Ihakara Street East Precinct with frontage to Ihakara Street or Trieste Way must not generate more than 100 vehicle movements in any hour; and e. any traffic generated by an activity permitted under GIZ-R5 (on the site at LOT 2 DP 441854 (Milne Drive, Paraparaumu) must not generate more than 50 vehicles per peak hour. 2. In all other zones, any activity must not generate more than 100 vpd, except extractive industries that are provided for as a restricted discretionary activity under EW-EXT-R13. 3. Standards 1 and 2 above shall not apply to temporary events or regular markets.	**Consent Triggered** Vehicle movements associated with the proposed activities exceed thresholds. Therefore, refer assessment against Restricted Discretionary rule TR-R10 below.

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
TR-R10 – Restricted Discretionary	**Vehicle movements that do not meet the permitted activity standards under TR-R2 (therefore deemed a major traffic activity(ies)).** Standards: 1. Any activity in Precinct B or Precinct C shall not generate more than 200 vehicle movements in any hour. 2. A Transport Assessment and a Travel Plan must be prepared by a suitably qualified person and submitted to Council with the application for resource consent.	**Does not comply** The full development will exceed the permitted threshold of 200 vehicle movements in any hour and is therefore classified as a Major Traffic Activity. The ITA assesses the full development as generating approximately 1,118 vehicle movements in the weekday AM peak and 1,736 vehicle movements in the PM peak. Also, the Integrated Transport Assessment notes that the total LFR activities will generate 400vph. The assessment prepared by Stantec accompanies the application and provides a detailed assessment of the transport effects of the proposal. As the final commercial and retail tenants are not yet known, a Travel Plan for these activities cannot be finalised at this stage. The ITA therefore recommends that a Travel Plan be prepared as a condition of consent and submitted to KCDC for certification. Accordingly, the proposal does not comply with TR-R10 and **Discretionary Activity** resource consent is required under Rule TR-R11 being: *Any activity which is not a permitted, controlled, restricted discretionary or non-complying activity.*
TR-R3 – Permitted	**Site access and loading** 1. Access - every site must provide either: a. vehicular access over land or by mutual right of way or service lane for parking and/or loading and shall be in accordance with TR-Diagram - 2; or b. for sites with no carparking or loading spaces, pedestrian access over land or by mutual right of way with a minimum 1.8 metre legal width may be provided as an alternative to vehicle access. 2. Vehicle access and pedestrian access - all vehicle accesses and pedestrian accesses must be designed, constructed and maintained to ensure that: a. they are able to be used in all weather conditions; b. they have no adverse impact on the roadside drainage system; and c. surface water and detritus (including gravel and silt) does not migrate onto the highway pavement. 3. Vehicle access - all vehicle accesses must meet the following: a. be a minimum of 3.5 metres wide, except for as set out in TR-Table 1. b. be a maximum of 9 metres wide, except in the Beach Residential Zone at Waikanae Beach where the maximum shall be 6.0 metres wide. 4. Vehicle access - sites containing non-residential activities and which provide more than 6 carparks, shall provide two-way vehicle accesses which must be a minimum of 6 metres wide. 5. Vehicle access to/from a state highway - sites that only have vehicle access via a state highway must only have one crossing point and shall be in accordance with Diagrams TR-Diagram - 1 and TR- Diagram - 2. 6. Vehicle access spacing - at intersections (except on strategic arterial routes) carrying traffic volumes of 1,000 vehicles or more in any peak hour, or at which traffic signals are operating, no part of a crossing point must be located within 30 metres of an intersection or within 60 metres on the departure side of an urban state highway intersection. 7. Vehicle access spacing - Where a site is located near an intersection having volumes less than 1,000 vehicles in any peak hour; the minimum distance between the crossing point and the roadway edge or kerb line must be: a. 9 metres measured from the intersecting point of the kerb lines or road edge lines or 4.5 metres from the tangent point of the kerb lines or road edge whichever is greater; and	**Does not comply** As further described in the *Integrated Transport Assessment* the following standards are not complied with: • Standard 3 – vehicle access width: some individual residential vehicle crossings may be less than the minimum 3.5 m width, particularly for narrower frontage lots and where adjoining dwellings are served by conjoined driveways. • Standard 6 – access separation from intersections: one proposed JOAL access to Road 2 is located approximately 23m from the Link Road signalised intersection, rather than the required 30m. The access is proposed to operate as exit-only to minimise turning movements and potential conflicts. • Standard 7 – access separation at lower-volume intersections: the final location of individual residential crossings has not yet been established and some lots adjoining intersections, particularly those with frontages of 12m or less, may be unable to achieve the required separation distances. • Standard 9 – sight distance: some individual residential crossings, particularly those near bends or intersections, may be unable to achieve the required sight distance. Conditions are proposed requiring detailed design to maximise sightlines and ensure appropriate visibility for anticipated operating speeds, including controls on fencing and landscaping within sightline splays. • Standard 14 – landscaping adjoining non-residential parking/loading areas: in some locations, particularly within the Town Centre area, parking and loading areas associated with non-residential activities are not separated from adjoining residential activities or sites by the required 2 m depth of landscaping.

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
	b. 12 metres where a "Stop" or "Give Way" control exists on the roadway measured from the intersecting point of the kerb lines or road edge lines. 8. Vehicle access spacing for major traffic activities - no crossing point must be located closer to any intersection than the distance specified in TR-Table 2 - Access Distance Dimensions. Distances are measured in metres (m) to the intersecting kerb line. 9. Vehicle access spacing sight distances – the required minimum sight distance between the vehicle access and the road must be in accordance with TR-Diagram - 3 and TR-Table 3 – Sight Distance Dimensions} (where m = metres) 10. Vehicle access spacing for state highways – the minimum distance between vehicle accesses on the same side of the road must be 7.5 metres for residential activities (excluding visitor accommodation that is not temporary residential rental accommodation) and 15 metres for all other activities. 11. The minimum separation distances between vehicle access to/from a state highway/rural road and an intersection on that state highway/rural road, between a vehicle access to/from a local road and the intersection of that local road with a state highway/rural road and between vehicle accesses to/from a state highway/rural road must meet the provided distances in TR-Table 4 - Access Distance Dimensions for State Highways and Rural Roads (where m = metres, km/h = kilometres per hour, and vpd = vehicles per day) 12. Manoeuvring – a. Private residential access - unless the driveway accesses directly from a Neighbourhood Access Route, sufficient manoeuvring space must be provided on-site to ensure no reversing onto the road is necessary. Note: for clarification see the Transport Network Hierarchy . b. Commercial properties – must ensure that all buildings and parking areas are designed so that sufficient manoeuvring space is provided on-site to ensure no reversing onto the road is necessary. 13. Loading spaces - every property in all Working Zones, the layout of loading spaces must comply with the 90 percentile design two-axled truck as defined by the Ministry of Transport and shall be designed in accordance with TR-Diagram - 7 . 14. Landscaping - for all non-residential activities, any parking, loading or trade vehicle storage area must be separated from adjoining sites by a minimum depth of 2 metres of landscaping. 15. Landscaping - all landscaping adjoining the road	• Standard 15 – landscaping and access visibility: as the final location of some individual residential vehicle crossings has not yet been established, compliance with the required sight distances cannot be demonstrated in all locations. Conditions are proposed to ensure landscaping and boundary treatments do not obstruct required sightline splays. Based on the above, **Discretionary Activity** resource consent is required under Rule TR-R11 being: *Any activity which is not a permitted, controlled, restricted discretionary or non-complying activity.*
TR-R4 – Permitted	**Design and layout of vehicle parking for all activities.** Standards: 1. All parking must be formed, marked out and maintained for use in all weathers. 2. Surface water originating from the parking area must be managed without adversely impacting other properties either upstream of downstream of the development subject site. 3. Vehicles using the parking area must only use the formed vehicle access point (crossing point) to enter and exit the vehicle parking areas.	**Complies** The proposed parking areas will be formed, marked and maintained for all-weather use. Surface water from parking areas will be managed through the proposed stormwater system, and vehicles will enter and exit parking areas via formed vehicle access points. The *Integrated Transport Assessment* identifies no infringements of the standards in TR-R4.
TR-R5 – Permitted	**Parking layout and design for all activities except residential activities. Visitor accommodation that is not temporary residential rental accommodation is included in this rule.** Standards: 1. All parking must be sealed or otherwise maintained to have a dust free surface, at all times, and shall comply with car parking dimension standards in TR-Diagram - 8 of this chapter. 2. All parking must be formed, marked out and maintained for use in all weathers. 3. When a parking area is required to accommodate three or more vehicles, parking spaces together with access and turning spaces	**Will comply** Parking associated with the proposed non-residential activities will be formed and sealed to an all-weather, dust-free surface and designed to comply with the parking dimensions in TR-Diagram 8. Parking, access and manoeuvring areas will be designed so vehicles can enter and exit in a forward direction without reversing to or from a legal road. Landscaping will be provided around commercial parking areas, including appropriate treatment of parking located within front yards. As the final detailed layout of the commercial and LFR areas will be confirmed through subsequent detailed design, the

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
	must be designed so as to ensure that vehicles are not required to reverse either on to or off legal road. 4. In the case where parking areas adjoin a Residential Zone, either a 2-metre high fully enclosed screen must be erected or a strip of minimum width of 5 metres adjoining the Residential Zone must be landscaped as follows: a. where a carparking area incorporates more than 5 carparks, 1m² of landscaping is required per carpark and must incorporate one tree capable of growing to 5 metres in height along every 10 metres of the carpark's street frontage; b. the amount of landscaping will be considered as a total, and street frontage landscaping and any landscaping/open space provided in terms of the Open Space and Recreational Zone section, and the Natural Environment Values section will be taken into account when assessing the 1m² of landscaping per carpark; c. planting must be completed within 12 months of commencement of the activity; d. the landscaping must be maintained in healthy condition and clear of litter; e. vehicle crossing points and pedestrian areas within public carparks must have illumination consistent with the Crime Prevention Through Environmental Design (CPTED) Guidelines (Appendix 6). 5. In the case where parking areas are located within the front yard of a subject site, a 2-metre wide strip must be formed along the front yard (except for vehicle crossings) of any carparking area which shall be landscaped to create a visual and physical barrier between the carpark area and the road. 6. Design for any critical access conditions, such as a ramp included as part of a parking building, must accommodate a 99 percentile design motor car in accordance with TR-Diagram - 6 of this Chapter.	*Integrated Transport Assessment* recommends a condition of consent requiring the parking areas within the commercial area to comply with TR-R5. Standard 6 does not apply as no parking buildings are proposed. Accordingly, no infringement of TR-R5 is sought.
TR-R6 – Permitted	**Heavy trade vehicle access** Standards: 1. Heavy trade vehicle accesses, including those for milk tankers and stock trucks, must be designed and constructed to carry the volume and weight of traffic likely to use the access and shall be designed in accordance with TR-Diagram - 4. 2. The surface of a heavy trade vehicle access must be constructed to the same standard as the adjoining road carriageway. This requirement must be deemed to have been complied with if the first 12 metres of the vehicle access, measured from the near edge of the carriageway, is so constructed. 3. Heavy trade vehicle accesses must be designed and constructed so that no heavy trade vehicle has to cross the road carriageway centre line when making a left turn.	**Will comply** Heavy trade vehicle access associated with the proposed commercial and LFR activities will be designed and constructed to accommodate the anticipated service vehicle demands, including the volume, weight and turning requirements of vehicles expected to use those activities. The final servicing arrangements will be confirmed through the proposed *Large Format Retail – Transport and Servicing Confirmation Report* condition, which will confirm the preferred servicing access and egress routes and demonstrate that service vehicles can safely enter, manoeuvre within and exit the Site in accordance with the applicable standards. Accordingly, no infringement of TR-R6 is sought.
TR-R9 – Controlled Activity	**New roads including where they are to serve a subdivision (including boundary adjustments).** Standards: 1. All roads in the Centres Zones must have foot paths on both sides of the road carriageway. 2. Cycle paths must be provided either as on-street cycle lanes, off-street shared paths or off-street dedicated cycle paths.	**Does not comply** The proposed new road network provides footpaths on both sides of the road carriageway, consistent with Standard 2 of TR-R9. The proposal also provides an extensive cycle network, including on-road cycle lanes and a shared path along the Town Centre Link Road, shared paths along Roads 2 and 3, and additional off-road shared paths and trails connecting through the Site and to the wider walking and cycling network. However, dedicated cycle paths are not provided on the lower-order local residential roads, where cyclists are instead proposed to share the carriageway. The *Integrated Transport Assessment* identifies this as an infringement of Standard 2 of TR-R9, while noting that

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
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		shared carriageway use on these lower-volume roads is consistent with the road typologies anticipated by the Council's LDMR and NZS 4404. Accordingly, the proposed new roads do not meet all of the controlled activity standards under TR-R9 and **Discretionary Activity** resource consent is required under Rule TR-R15 being: *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.*
NATURAL HAZARDS		
NH-FLOOD-R2 – Permitted	**Any building or structure in any zone.** Standards 1. Separation from waterbodies a. Buildings (excluding minor buildings) shall not be sited within the river corridor or stream corridor (unless they are permitted activities under NH-FLOOD-R7): i. For the stream corridor and other waterbodies, including ephemeral and intermittent rivers or streams (except lakes) the minimum setback for any building or structure (other than a bridge or culvert structure for which a resource consent is required from the Regional Council) from the natural banks of any waterbody greater than 3 metres wide shall be 10 metres; ii. For streams/drains less than 3 metres wide, the minimum setback must be 5 metres where the average width of the stream or waterbody is measured as an average within the site. 2. Buildings (excluding minor buildings) must not be sited within 5 metres of a lake.	**Does not comply** – Restricted Discretionary Activity under NH-FLOOD-R9. The Proposal includes buildings, structures and associated infrastructure within areas identified as stream corridors under the District Plan, including works associated with the proposed road network and stormwater infrastructure. Accordingly, **Restricted Discretionary Activity** resource consent is required under NH-FLOOD-R9 for non-compliance with the applicable standards of NH-FLOOD-R2.
NH-FLOOD-R3 – Permitted	**New or relocated buildings (excluding minor buildings) in ponding, residual ponding and shallow surface flow areas.** Standards 1. The building floor level of any new or relocated building (excluding minor buildings) in the ponding, shallow surface flow or residual ponding area shall be constructed above the 1% AEP flood event level.	**Does not comply – technical infringement** The Proposal includes new buildings within areas mapped as Ponding under the District Plan. However, the proposed flood management works will establish a dedicated flood storage area adjoining the Wharemaukū Stream. This will effectively redistribute the mapped flood hazard areas, with flood storage accommodated within a defined area where no buildings are proposed. The proposed building platforms will be located outside the resulting flood storage area, with finished floor levels established above the modelled 1% AEP flood level. Accordingly, while buildings are proposed within the currently mapped flood hazard areas, the flood management measures will ensure that the development is appropriately located and protected from flooding. Given the existing District Plan flood hazard mapping, resource consent is sought as a **Restricted Discretionary Activity** under Rule NH-FLOOD-R9.
NH-FLOOD-R4 - Permitted	**Earthworks except where associated with the matters listed below:** **1. the maintenance of a watercourse or stormwater control;** **2. activities permitted under NH-FLOOD-R6;** **3. maintenance activities within the legal road;** **4. private farm tracks which are ancillary to permitted farming activities and are not within an outstanding natural features and landscapes;** **5. residual ponding areas where the earthworks permitted activity standards for the relevant zone are complied with (see EW-Earthworks for rules on earthworks);**	**Does not comply** The Proposal involves earthworks within areas mapped as Ponding Area and Stream Corridor. The works within the Stream Corridor will also be undertaken by the Applicant. The earthworks are necessary to establish development platforms, accommodate infrastructure and implement the proposed flood management measures, including a dedicated flood storage area where no buildings are proposed.

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	RULE DETAIL	COMPLIANCE / COMMER
	6. earthworks subject to NH-FLOOD-R8 (i.e. within a flood storage or fill control area); **7. extractive industries (see NH-FLOOD-R7);** **8. the removal or replacement of underground fuel storage tanks; and** **9. "earthworks" as defined in and regulated by the NESCF.** Standards 1. In an overflow path or residual overflow path (excluding fill which is addressed in NH-FLOOD-R10), earthworks: a. shall not involve the disturbance of more than 10m3 of land in any 10 year period; b. shall not alter the original ground level by more than 0.5 metres, measured vertically; and c. shall not impede the flow of floodwaters. 2. In ponding areas (excluding residual ponding areas) and shallow surface flow areas, earthworks: a. shall not involve the disturbance of more than 20m3 (volume) of land in any 10 year period; and b. shall not alter the original ground level by more than 1.0 metre, measured vertically. 3. In a stream corridor or river corridor (excluding fill which is addressed in NH-FLOOD-R15), earthworks: a. shall not exceed 10m3 in any 10 year period. This standard applies whether in relation to a particular work or as a total or cumulative; and b. must be carried out by Wellington Regional Council, Kāpiti Coast District Council, the Department of Conservation or their nominated contractors.	Resource consent is required for a **Discretionary Activity** under Rule NH-FLOOD-R15 as follows: *In any a stream corridor, or river corridor, fill earthworks, or earthworks that do not comply with one or more of the permitted activity standards in NH-FLOOD-R4.*
NH-FLOOD-R5 - Permitted	**Fences in any flood hazard area** Standards **1.** Fences in the river corridor, stream corridor, an overflow path or residual overflow path shall be post and wire and shall not impede the free flow of flood waters.	**Does not comply** Fencing is proposed within areas mapped as Ponding Area and Stream Corridor. However, no fencing is proposed within the new flood storage area established through the proposed flood management works. **Restricted Discretionary Activity** resource consent is required under NH-FLOOD-R9 as follows: *Any activity listed as a permitted or controlled activity listed in Rules NH-FLOOD-R1 to NH-FLOOD-R8 which does not comply with one or more of the associated standards, unless otherwise specified.*
NH-FLOOD-R6 - Permitted	**Flood protection, erosion control and natural hazard mitigation measures including associated structures in the Open Space or Natural Open Space Zones (but not the Private Recreation and Leisure Precinct), and the stream or river corridor.** Standards 1. All works must be carried out by Wellington Regional Council, Kāpiti Coast District Council, the Department of Conservation or their nominated contractors.	**Does not comply** The proposed earthworks associated with the flood protection works within the small portion of the site zoned Open Space will be undertaken by the Consent Holder. **Restricted Discretionary Activity** resource consent is required under NH-FLOOD-R9 as follows: *Any activity listed as a permitted or controlled activity listed in Rules NH-FLOOD-R1 to NH-FLOOD-R8 which does not comply with one or more of the associated standards, unless otherwise specified.*
NH-FLOOD-R8 – Controlled	**Development and earthworks within any flood storage or fill control area.** **The following are excluded from this rule:** • **earthworks managed under the NESCF** • **extractive industries (see EW-EXT)** • **earthworks associated with the removal and replacement of underground fuel storage tanks.** Standards	**Complies** The Proposal involves development and earthworks within areas mapped as Flood Storage under the District Plan. As detailed in the *Flood Risk Assessment*, the proposed flood management measures include the establishment of a dedicated flood storage area. The assessment confirms that the proposed works provide equivalent compensatory flood storage and

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
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	1. Equivalent compensatory storage or another solution to achieve hydraulic neutrality shall be created. 2. Development proposals shall be accompanied by sufficient hydraulic modelling of relevant streams to fully test consequences of the activity. 3. The building floor level of any new or relocated building (excluding minor buildings) shall be constructed above the 1% AEP flood event level.	achieve hydraulic neutrality, supported by detailed hydraulic modelling. Proposed building floor levels will also be established above the modelled 1% AEP flood level. Accordingly, the Proposal complies with Standards 1–3, and resource consent is required as a **Controlled Activity** under Rule NH-FLOOD-R8.
NH-FLOOD-R11 – Restricted Discretionary	**In a ponding or shallow surface flow area, earthworks which do not comply with one or more of the permitted activity standards under NH-FLOOD-R4.** **The following are excluded from this rule:** • **earthworks managed under the NESCF** • **extractive industries (see EW-EXT)** • **earthworks associated with the removal and replacement of underground fuel storage tanks.** No standards	**Consent required** The Proposal involves earthworks within mapped Ponding Areas that exceed the permitted limits under NH-FLOOD-R4. **Restricted Discretionary Activity** resource consent required under this Rule NH-FLOOD-R11.
EARTHWORKS		
EW-R1	**Earthworks not otherwise provided for in this chapter.** Standards: 1. The activity complies with all permitted activity standards in this chapter.	**Does not comply** Refer assessment below against the other rules and standards of the earthworks chapter.
EW-R2	**Earthworks, excluding those listed in EW-R3, in all areas except areas subject to flood hazards, outstanding natural features and landscapes, ecological sites, geological features, areas of outstanding natural character, areas of high natural character.** Standards 1. Earthworks must not be undertaken: a. on slopes of more than 28 degrees; or b. within 20 metres of a waterbody, including wetlands and coastal water. 2. In all other areas except as provided for in Standard 3, earthworks must not: a. disturb more than 50m³ (volume) of land per subject site in residential zones, working zones, natural open space zones and open space zones (excluding the Private Recreation and Leisure Precinct) within a 5 year period; b. disturb more than 100m3 (volume) of land per subject site in rural zones within a 5 year period; and c. alter the original ground level by more than 1 metre, measured vertically. This standard applies whether in relation to a particular earthwork or as a total of cumulative earthworks within the specified period. 3. Not applicable – applies to telecommunication facilities. Standards 1 and 2 under this rule do not apply, to: 4. earthworks associated with farm and forestry tracks permitted under GRUZ-R4, RPROZ-R4, RLZ-R4 and FUZ-R4; ….. drilling bores; installing and maintaining services such as water pipes and troughs; or where a more specific earthworks provision is provided for in the zone or precinct methods; earthworks required to effect a subdivision of land in the Ōtaki South Precinct under SUB-WORK-R45. 5. Any earthworks must ensure that: a. Surface runoff from the subject site is isolated from other subject sites and existing infrastructure; and	**Does not comply** Does not comply with Standards 1(b) and 2. This rule applies to earthworks outside the mapped flood hazard areas and excludes earthworks within the Dune Protection Area identified in the MCZ Structure Plan, which are subject to specific MCZ earthworks provisions. The Proposal involves earthworks exceeding the permitted volume and ground level alteration limits under Standard 2, including works within 20m of waterbodies and wetlands, contrary to Standard 1(b). The ECMP sets out measures to manage surface runoff, minimise sediment discharges to waterbodies and the stormwater network, and maintain erosion and sediment controls throughout construction, consistent with Standard 5. Accidental discovery protocols consistent with Standard 6 are also included in the proposed consent conditions. Resource consent is therefore required for non-compliance with Standards 1(b) and 2. Therefore, **Restricted Discretionary** resource consent require under Rule EW-R5 being: *Earthworks not complying with one or more of the permitted activity standards in EW-R2 or EW-R3.* Matters of discretion are limited to: 1. *The degree of compliance with the Kāpiti Coast District Council Land Development Minimum Requirements.* 2. *The effects on water collection areas.* 3. *The degree of compliance with any applicable Environmental Management Plan or Structure Plan applicable to the development.* 4. *Ecological effects.* 5. *Visual and amenity effects.*

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	**RULE DETAIL**	**COMPLIANCE / COMMER**
	b. The potential for silt and sediment to enter the stormwater system or waterbodies in surface runoff from the subject site, is minimised; and c. Erosion and sediment control measures are installed and maintained for the duration of the construction period, where necessary. 6. Accidental Discovery Protocol (HH-Table 1) to be followed for any accidental discovery of a waahi tapu or other cultural site. a. Accidental Discovery Protocol – should a waahi tapu of other cultural site be unearthed during earthworks the contractor and/or owner must:- i. cease operations; ii. inform local iwi; iii. inform Heritage New Zealand and apply for the appropriate authority if required; iv. take appropriate action, after discussion with Heritage New Zealand, Council and Iwi to remedy damage and/or restore the site.	
EW-R3	**Earthworks in all areas associated with:** **1. road maintenance activities within the legal road.** **2. maintenance of access ways, including walkways and cycle ways not within legal road.** **3. activities permitted under NH-FLOOD-R4, NH-FLOOD-R6, and NH-FLOOD-R7 except within outstanding natural features and landscapes in the Coastal Environment.** **4. the construction of telecommunication and radio communication facilities, and their maintenance, renewal and minor upgrading within the legal road.** **5. maintenance of farm tracks permitted under GRUZ-R4, RPROZ-R5, RLZ-R5 and FUZ-R5.** **6. approved building (excluding minor buildings) developments, subject to a building consent, where the earthworks do not extend more than 2 metres beyond the foundation line of the building.** Standards: 1. Any earthworks must ensure that: a. surface runoff from the subject site is isolated from other subject sites and existing infrastructure; and b. the potential for silt and sediment to enter the stormwater system or waterbodies in surface runoff from the subject site, is minimised; and c. erosion and sediment control measures are installed and maintained for the duration of the construction period, where necessary. 2. Archaeological Discovery Protocol to be followed for any accidental discovery of a waahi tapu or other cultural site. a. Accidental Discovery Protocol – should a waahi tapu or other cultural site be unearthed during Earthworks the contractor and/or owner must:- i. cease operations; ii. inform local iwi; iii. inform Heritage New Zealand and apply for the appropriate authority if required; iv. take appropriate action, after discussion with Heritage New Zealand, the Council and Iwi to remedy damage and/or restore the site.	**Does not comply** The proposed earthworks are associated with the development of the Site, including formation of development platforms, roads and accessways, servicing, stormwater and flood management infrastructure, wetland works and open space areas. These works do not fall within the activities specified in EW-R3 and therefore do not qualify as a permitted activity under this rule. On this basis, **Restricted Discretionary Activity** resource consent is required under Rule EW-R5 being: *Earthworks not complying with one or more of the permitted activity standards in EW-R2 or EW-R3.* Refer matters of discretion under Rule EW-R2 above.
SIGNS		
SIGN-R8	**Signs in the Working Zones** **General Permitted Activity Standards for Signs in the Working Zones.**	**Does Not Comply**

TABLE 1: DISTRICT PLAN RULE AND STANDARD ASSESSMENT		
RULE	RULE DETAIL	COMPLIANCE / COMMER
	1. The maximum total area of signage per business premises/tenancy shall not exceed 5m^2 excluding sale of property/for lease signs, community purpose event/charity event signs, election signs and moveable footpath signs. 2. In addition to the signage provisions set out in standard 1 above, subject sites may have a maximum of 1 free-standing sign per road frontage provided that: a) each free-standing sign must not exceed 6 metres in height (above original ground level); b) each free-standing sign must not exceed 5m^2 in area; and c) lettering and symbols on each free-standing sign are limited to: i. name and logo of the subject site or business complex (if relevant); and ii. names and logos of businesses operating from the subject site; and iii. hours of operation. The following sign-specific standards listed in SIGN-Table 2 apply: ….	The proposed large format retail, mixed-use and drive-through activities will require signage. The District Plan provides a comprehensive framework for managing signage within the Working Zones, including standards relating to signage area, height, location and design, together with specific requirements for different sign types under SIGN-Table 2. The majority of signage associated with the development is anticipated to comply with these permitted activity standards. However, the proposed freestanding pylon signage, including the multi-brand pylon serving the drive-through activities, is anticipated to exceed the permitted standards under SIGN-R8. Accordingly, resource consent is sought for the proposed pylon signage as a discretionary activity under SIGN-R15. The final signage arrangements for individual commercial and retail tenancies cannot be fully determined at this stage, as the future occupants and their specific signage requirements are not yet known. With the exception of the pylon signage authorised by this consent, all future signage will be required to comply with the applicable permitted activity standards under SIGN-R8 and SIGN-Table 2, or obtain any separate resource consent required. The proposed KCDC conditions for the large format retail, mixed-use and drive-through developments already require final signage details to be submitted as part of the detailed design process. These requirements provide for Council oversight of the final location, dimensions, height, design and illumination of signage associated with the respective activities, while the District Plan standards will continue to apply to signage not specifically authorised by this consent. **Discretionary Activity** resource consent required under Rule SIGN-R15.

COASTAL ENVIRONMENT RULES AND STANDARDS

Coastal Environment Chapter – Not applicable

The Site is located within the mapped Coastal Environment. However, the rules and retained District Plan 1999 provisions do not impose any additional resource consent requirements on the Proposal, for the following reasons:

- CE-R1 and CE-R2: These rules apply to specified activities within areas of outstanding or high natural character in the General Residential, Rural, Natural Open Space and Open Space Zones. There are no mapped areas of outstanding or high natural character on the Site.
- District Plan 1999 – C.9 Coastal Environment: The retained policies primarily address development within areas susceptible to coastal erosion and sea level rise, including restrictions on buildings and coastal protection works. These provisions do not establish separate activity rules or standards applicable to the Proposal.
- District Plan 1999 – C.15 Natural Hazards: The retained objective and policies address flood and erosion hazards, including the role of natural features such as dunes in providing hazard protection. These provisions do not establish separate resource consent requirements. Flood hazards affecting the Site are addressed through the applicable Natural Hazards Chapter rules.
- District Plan 1999 – D.1.2.1(iii), Coastal Building Line Restriction: This standard applies to buildings within the specifically mapped 20m coastal building line restriction at Paraparaumu, Raumati and Paekākāriki. The NCP Site is located inland of these coastal frontage areas and is not subject to this restriction.
- District Plan 1999 – D.1.2.1(iv), Relocatable Buildings: This standard applies to buildings within the specifically mapped relocatable building area extending inland from the coastal building line. The Site is not located within this area.
- District Plan 1999 – D.1.1 Residential Zone Rules: The retained permitted and discretionary activity rules relate to the associated coastal building restrictions and relocatable building requirements. As neither restriction applies to the Site, these rules do not trigger any additional resource consent requirements.

Accordingly, while the Site is located within the wider Coastal Environment, no resource consent is required under the Coastal Environment Chapter or the retained District Plan 1999 provisions. Relevant coastal environment objectives and policies are considered separately in the statutory assessment.

2. KAPITI COAST DISTRICT PLAN OBJECTIVES AND POLICIES

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
METROPOLITAN TOWN CENTRE ZONE OBJECTIVES AND POLICIES	
MCZ-P1 METROPOLITAN CENTRE ZONE The Metropolitan Centre Zone will be developed for a range of activities which recognises its importance as the core of the Paraparaumu Sub-Regional Centre. This zone will be developed in a way which achieves an integrated and compact core, ensures all precincts are well connected through pedestrian and transport networks, and provides for a broad range of mutually compatible activities that are integrated with public transport, and that provide a strong community focal point. The following land uses will be provided for in the Metropolitan Centre Zone consistent with the Metropolitan Centre Zone Structure Plan in Appendix 19: 1. retail and commercial activities (excluding industrial activities) in Precinct A that contribute to a vibrant and vital centre and will activate the following streets: a) existing State Highway One (Main Road); b) Rimu Road; c) the desired connector roads in Precinct A; 2. residential activities (excluding visitor accommodation that is not temporary residential rental accommodation in Precinct B); 3. clustered community facilities, including civic offices, community centres, community libraries, displays of information to the public, courthouses, and public toilets in Precinct B; 4. commercial (excluding industrial), limited retail and residential activities in Precinct C which do not adversely affect the role, function and vitality of Precinct A; 5. a large consolidated stormwater management area and, if practicable, wetland to provide for flood storage, ecological values and amenity values; and 6. recreational opportunities along the Wharemauku Stream, Drain 3, other stormwater management and wetland areas, and in Precinct B.	Specifically regarding clause 4) the *Economic Assessment* states the following: *The proposed 20,000m² LFR component responds to identified district-wide demand, with the assessment identifying an existing shortage of approximately 6,600m² of LFR floorspace, increasing to approximately 18,610m² by 2045.* *The proposed 3,800m² convenience retail and service component will broaden the range of activities within the development and wider Metropolitan Centre. The commercial development represents an expansion of the existing Paraparaumu town centre rather than the establishment of a separate or competing centre. It will increase the diversity of retail and service activities, support agglomeration benefits and contribute to the overall vitality and functionality of the Metropolitan Centre.* *The proposed convenience retail and service activities are not of a scale likely to support a material concentration of comparison retail and are therefore not expected to materially detract from the role, function or vitality of Precinct A. The proposal also retains opportunities for future town centre retail and commercial development within Precinct A2. On this basis, the proposal is considered consistent with MCZ-P1(4) from an economic perspective.* As further described in the *Urban Design Statement,* the proposal is consistent with the land uses and urban form anticipated for Precinct C, comprising large format retail/commercial and specialty retail activities, medium and higher density residential development, and multifunctional open spaces incorporating wetlands, stormwater management and passive recreation. The distribution of these activities provides an integrated and compact urban form that connects with Rimu Road and the civic precinct, Kāpiti Road and Ihakara Street, supported by a legible movement network and active mode connections, including separated cycle facilities along the Link Road. Higher density residential development and activity are concentrated around a defined community focal point, while the arrangement of residential, commercial and open space uses provides for compatible interfaces between activities. Importantly, the *Urban Design Statement* concludes that the proposal *"complements the wider Metropolitan Centre while maintaining the role and function of Precinct A as its primary retail and commercial core."* The consolidated stormwater and wetland area also performs multiple functions, providing flood storage and ecological enhancement alongside amenity, passive recreation and connections with the Wharemaukū Stream and wider open space network.
MCZ-P2 - METROPOLITAN CENTRE ZONE PRECINCTS Subdivision, use and development in the Metropolitan Centre Zone will be undertaken in accordance with the Metropolitan Centre Zone Structure Plan in Appendix 19 and consistent with the relevant matters in the Centres Design Guide in Appendix 25, in a manner that reinforces the following specific management principles for each precinct: 1. Precinct A Manage Precinct A to maintain and reinforce its purpose as the primary retail and commercial core within the District and to improve amenity values and functional diversity. Manage Precinct A1 to enhance existing retail and commercial development, while managing Precinct A2 to enable development for retail, commercial and residential activities (excluding industrial activities) and to reinforce the amenity and function of the existing retail and commercial core. Precinct A will be developed in the following manner:	The *Economic Assessment* states the following with respect to this policy: *The proposed LFR component responds to identified district-wide demand. Existing LFR provision is estimated to be approximately 6,600m² below current demand, with the combined shortfall and additional demand increasing to approximately 18,610m² by 2045. The proposed 20,000m² of LFR therefore broadly aligns with estimated medium to long-term demand (refer Section 6).* *LFR is also considered to be well suited to Precinct C given its Kapiti Road frontage, while retaining Precinct A2 for future town centre retail and commercial development that can better integrate with Coastlands and the existing centre. This is consistent with the Structure Plan approach, which allows development to adapt over time, including provision for more intensive uses and the future sleeving of commercial development.* *The proposed 3,800m² convenience retail and service component will complement the LFR and residential components of the development and broaden the range of activities within the Metropolitan Centre. Within the context of the wider Paraparaumu Sub-Regional Centre, its scale and nature are not expected to result in significant adverse effects on the vitality or viability of the Metropolitan Centre, including Coastlands or future retail development within Precinct A2.*

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
a) accessibility to active or public transport, transport circulation and integration within the surrounding Metropolitan Centre precincts and the rail interchange, is improved; b) diversity and choice in terms of the shopping and social experience for the wider Kapiti Coast community is created, and a variety of commercial and entertainment activities is enabled (excluding industrial activities); c) the extent and diversity of employment is retained and increased; d) retail and commercial activities (excluding industrial activities) adjoining Rimu Road are provided for where these provide an active edge, and where activities remain compatible with the role of Precinct A as the primary commercial core of the Metropolitan Centre; e) enable apartment and mixed use activities to occur alongside the eastern edge of the green network of the Wharemauku Stream in a manner that enhances the recreational values of stream margins; f) amenity values for pedestrians that utilise the adjoining public realm are improved; and g) building development adjoining Rimu Road will have active frontages and avoid blank facades. 2. Precinct B Manage Precinct B to consolidate its role as the community and civic focal point for the District. Precinct B will be developed in the following manner: a) accessibility to active or public transport, transport circulation and integration within the surrounding Metropolitan Centre precincts will be provided, while reinforcing the development of Rimu Road as the Metropolitan Centre's Main Street; b) community uses and civic facilities will be consolidated in the Iver Trask Place and Ngahina Street areas; and c) substantial stormwater management facilities will be provided where these also provide ecological and recreational values. 3. Precinct C Manage Precinct C to provide development areas, some being subject to the resolution of stormwater management, to reinforce the sub-regional status and the vitality and functioning of the Metropolitan Centre. Precinct C shall be developed to provide strong connections within the Metropolitan Centre Zone and to accommodate development that is compatible with and complementary to the balance of the Centre and reinforces the role and function of the Sub-Regional Centre. Precinct C will be developed in the following manner: a) accessibility to active or public transport, transport circulation and integration within the surrounding Metropolitan Centre precincts will be provided for; b) adverse effects that would otherwise decrease the efficiency and effectiveness of Kāpiti Road as a transport corridor, including for public transport, will be managed; c) amenity values of Kāpiti Road will be maintained or enhanced; d) 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	*The proposal also provides approximately 593 dwellings, including a significant proportion of terrace housing and apartments. This substantially increases residential living opportunities within the Metropolitan Centre and supports the higher-density residential outcome anticipated within Precinct C.* *On this basis, the proposal is considered to support the relevant Precinct C provisions of MCZ-P2 from an economic perspective.* And the *Landscape and Visual Impact Assessment* states the following with respect to this policy: *The proposal generally reflects the outcomes anticipated by the Metropolitan Centre Zone Structure Plan through a mix of residential, commercial and retail activities supported by an integrated road, pedestrian, open-space and stormwater network. Within Precinct C, the proposal provides for higher density residential and commercial development together with strong connections through the wider Metropolitan Centre. Landscape treatment, open spaces and planting along movement corridors will assist in maintaining amenity, including along Kapiti Road.* *The proposal will modify the existing dune system, including removal of the eastern dune and modification of the western dune. The 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.* *Consistent with MCZ-P2(d), where effects on the dune system cannot practicably be avoided, the proposal responds through the design and planting of a new realigned landform along the Kāpiti Expressway boundary and wider environmental enhancements across the site. These include retention and naturalisation of the Wharemaukū Stream in its existing alignment, enhancement of the wetland system, extensive native planting and the establishment of an integrated blue-green and open-space network providing ecological, recreational and landscape benefits..* *Overall, the proposal responds to the intended mixed-use, connected and landscape character of the Metropolitan Centre Zone.* As further described in the *Urban Design Statement*, the proposal responds comprehensively to the outcomes sought for Precinct C and will reinforce the sub-regional status, vitality and functioning of the Metropolitan Centre. In particular: • Active and public transport accessibility, circulation and integration: The Link Road and local road network connect to Kāpiti Road and the wider town centre network. Dedicated cycle facilities, a connected shared path network and provision for future public transport movements and stops provide strong multimodal connections within the site and to the wider Metropolitan Centre. • Efficiency and effectiveness of Kāpiti Road: As assessed in the ITA, access from Kāpiti Road is consolidated through appropriately designed intersections, including signalisation where required, with no individual vehicle accesses along the frontage. This manages effects on the function of Kāpiti Road as a key transport and public transport corridor. • Amenity values of Kāpiti Road: A landscaped interface along Kāpiti Road will soften views of the development and provide an appropriate transition from the road and residential development to the north. The detailed design and appearance of the adjoining LFR buildings will also be subject to subsequent design review. • Effects on the dune system: The *Urban Design Statement* and *Landscape and Visual Impact Assessment* identify that retention of the dune system in its entirety is not practicable while achieving the development outcomes anticipated for Precinct C. Effects are minimised through the proposed landscape response, including the establishment of a new western landform along the Kāpiti Expressway boundary, incorporating an irregular dune-influenced profile, indigenous planting, a shared trail and lookout. While this will not retain the existing dune landform or fully replace its associated values, it will provide topographic variation, visual buffering and a recognisable landscape feature within the developed Site. • Complementary activities and the role of Precinct A: The distribution of commercial, residential and open space activities complements the wider

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
mitigated or offset by environmental enhancements within Precinct C that are commensurate with the scale of the adverse effects. e) the establishment of complementary activities, including commercial and residential activities (excluding industrial and retail activities), will be provided for where activities remain compatible with the role and function of Precinct A as the primary retail and commercial core of the Metropolitan Centre Zone; f) allowance for retail activities will be limited in type and scale, to ensure adverse effects on the vitality and viability of the Metropolitan Centre will not be significant; g) higher density residential activities will be enabled in conjunction with commercial activities (excluding industrial and retail activities); and h) stormwater management will be provided to address stormwater concerns and, where practicable, will also support ecological and recreational values.	Metropolitan Centre while, as described in the Urban Design Statement, "maintaining the primacy of Precinct A" as the primary retail and commercial core. • Retail activities: Retail is predominantly limited to approximately 20,000 m² of LFR, with only approximately 3,800 m² of specialty retail/commercial floorspace. The Economic Assessment concludes that the integrated mix of uses "enhances accessibility, supports agglomeration economies, and improves the overall performance and efficiency of the primary centre". The retail offer is therefore targeted in type and scale and complementary to the established role of Precinct A. • Higher density residential activities: Approximately 593 dwellings are proposed across a range of typologies, including detached and courtyard housing, duplexes, townhouses and apartments. Higher density development is concentrated around central activity areas and within easy walking distance of the wider Metropolitan Centre and public transport network. • Stormwater, ecological and recreational values: A large consolidated wetland and flood management area provides flood storage and stormwater management, supported by swales and rain gardens. As addressed in the engineering and Ecological Impact Assessment s, these areas also provide biodiversity enhancement and form part of the publicly accessible open space and trail network. Overall, the proposal responds directly to each of the development outcomes identified by MCZ-P2 and provides the integrated mix of land uses, transport connections, environmental management and open space anticipated for Precinct C.
MCZ-P3 - HOSPITAL ZONE AND PRECINCT B OF THE METROPOLITAN CENTRE ZONE Subdivision, use and development in the Hospital Zone and Precinct B of the Metropolitan Centre Zone will provide for community, civic, cultural, education, health and recreation uses, facilities and services which serve the local community and District. The Hospital Zone will have a civic focus and will provide for a network of facilities which meet the needs of the community now, and into the future. Subdivision, use and development in the Hospital Zone and Precinct B of the Metropolitan Centre Zone will be undertaken in accordance with the following principles: 1. retail and commercial activities (excluding industrial activities) will only be provided for where they are limited in scale and are ancillary to community, civic, cultural, education, health or recreation uses; 2. the co-location, sharing and efficient use of facilities and associated infrastructure will be supported; 3. design will be high quality and contribute to a high level of amenity; 4. development and landmarks will be appropriate to and reflect the natural, cultural and historical identity of the District; 5. public spaces will provide places where people can safely meet, play and interact; 6. viewshafts of key landforms, including remnant dunes and Kāpiti Island, will be maintained and framed by streets and buildings (excluding minor buildings); 7. buildings (excluding minor buildings) will have active frontages, including frequent entrances and windows and architectural details, which are appropriate to the use of the building; 8. streets and development will be designed at a high quality pedestrian scale to create a slow street traffic environment; 9. public spaces will provide for the clear and easy movement of people;	The proposal does not otherwise involve subdivision, land use or development within Precinct B. Its relevance to MCZ-P3 is limited to the proposed extension of the road network to provide the Iver Trask Road connection through Precinct B. The connection will improve integration between Precinct B, the application site and the wider Metropolitan Centre, providing a clear and convenient movement connection consistent with the policy's emphasis on accessibility, connectivity and the efficient use of infrastructure. The road connection does not introduce activities or built development that would compromise the community, civic and related functions anticipated within Precinct B. The proposal is therefore consistent with MCZ-P3 insofar as that policy is relevant to the proposed Iver Trask Road connection.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
10. development will be undertaken in accordance with the Crime Prevention Through Environmental Design Guidelines in Appendix 6; 11. access through and around facilities, buildings and public spaces will be clear and convenient for all visitors and workers; and 12. universal design principles will be adopted in buildings (excluding minor buildings), infrastructure and streets.	
MCZ-P4 - CENTRES HIERARCHY The role, function, distribution, size and design of each centre is managed according to a centres hierarchy to ensure they can collectively meet community needs, and enable employment, goods and services to be accessed efficiently and equitably by the community. Development, use and subdivision within each centre will be of a type, scale, intensity and design appropriate to the position of that centre in the hierarchy. Centres include a range of activities that are compatible with and support their functioning, including community and civic activities, educational and cultural activities, and appropriate residential activities. The hierarchy of centres within the District is as follows: 1. Paraparaumu Sub-Regional Centre (encompassing the Metropolitan Centre Zone and the Mixed Use Zone); 2. Town Centres; and 3. Local Centres.	The *Economic Assessment* states the following with respect to this policy: *The proposal provides for a significant amount of residential, retail and commercial development within the Paraparaumu Sub-Regional Centre. The scale and mix of development are broadly aligned with estimated demand, including identified demand for additional housing and LFR floorspace over the medium to long term (refer Sections 5 and 6).* *Additionally, the proposal would improve access to housing, employment, goods and services within the surrounding area. It is also expected to contribute towards retaining more expenditure within the District and reducing reliance on travel to larger centres outside the District for a wider range of goods and services.* *On this basis, the proposal is considered to support and strengthen the role and function of the Paraparaumu Sub-Regional Centre within the District's centres hierarchy and is consistent with MCZ-P4 from an economic perspective.* Consistent with this assessment, the proposed mix and intensity of residential, LFR, specialty retail and commercial activities is appropriate to Paraparaumu's position as the District's highest-order centre. The proposal consolidates these activities within the existing Sub-Regional Centre and, as described in the *Urban Design Statement*, provides an integrated urban form and movement network that connects with and complements the wider Metropolitan Centre. Overall, the proposal will support and strengthen the role and function of the Paraparaumu Sub-Regional Centre and is therefore consistent with MCZ-P4.
MCZ-P5 - ACTIVITIES IN THE WORKING ZONES Business activities are the primary land use and function of the Working Zones. The location, scale, size and design of subdivision, use and development in the Working Zones will be undertaken with regard to the following principles: 1. local and on-site amenity values are maintained and enhanced where practicable, while recognising that these values develop and change over time in response to the diverse and changing needs of people, communities and future generations; 2. local built identity and character values are considered; 3. connectivity and access within and to the Working Zones is enhanced; 4. opportunities for transport choice and efficiency are maximised, including integration with public and community transport; 5. built form is compatible with the planned built character of the Zone; 6. facilities are integrated within the centre or other Working Zones; and 7. temporary events will be enabled in centres where they are consistent with the scale, role and function of the centre.	The proposal is consistent with the principles applying to development within the Working Zones. In particular: • The proposal incorporates substantial landscaping, streetscape planting and an integrated wetland and open space network. These features provide amenity within the development and manage interfaces between residential, commercial and LFR activities and surrounding areas. • As described in the Urban Design Statement, the proposal establishes a coherent urban structure and hierarchy of built form, with higher intensity development focused around the central activity areas and appropriate transitions to surrounding development. The landscape response also retains and reinterprets elements of the site's dune character. • The Link Road and local road network provide new connections through the site and to Kāpiti Road, Rimu Road/Iver Trask Road and the wider Metropolitan Centre. A connected pedestrian and cycle network is integrated throughout the development. • Dedicated cycle facilities, shared paths and pedestrian connections provide alternatives to private vehicle travel. The internal road network has also been designed to accommodate public transport movements and future bus stops, supporting integration with the wider public transport network. • The proposed mix and intensity of commercial, LFR and medium and higher density residential development is consistent with the urban scale and form anticipated within the Metropolitan Centre Zone and Precinct C in particular. • Residential, commercial, retail, open space and transport activities are integrated within a comprehensive masterplan and connected to the wider Metropolitan Centre, rather than operating as an isolated development. Principle (7), relating to temporary events, is not relevant to the proposal. Overall, the proposal provides an integrated mixed-use development that maintains amenity, enhances connectivity and transport choice, and provides

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	a built form appropriate to the planned character and function of the Metropolitan Centre Zone. It is therefore consistent with MCZ-P5.
MCZ-P6 INTENSIFICATION OF CENTRES The growth and development of centres will be provided for in a manner which contributes to their vibrancy, vitality, efficiency and amenity values. Subdivision, use and development which increases the concentration of business activities within a centre will be provided for where it: 1. does not undermine the role, function and viability of other higher or similar centres; 2. is consistent with the identified role and function of the centre; 3. increases the range of compatible and complementary land uses and activities within the centre; 4. supports a high level of access and connectivity within the centres and between the centres, recreational and residential areas; 5. contributes to a high amenity environment and provides a strong sense of place; and 6. supports increased residential living opportunities, where appropriate.	The *Economic Assessment* states the following with respect to this Policy: *The proposal is considered to represent an expansion of the existing Paraparaumu centre rather than a separate competing centre. The LFR component responds to identified district-wide demand and broadly aligns with estimated medium to long-term demand (refer Section 6). Additionally, the proposed 3,800m² convenience retail and service component will broaden the range of activities available within the development and wider centre and is expected to complement Coastlands and future retail development within Precinct A2.* *The proposal also increases the range of activities within the centre through the provision of LFR, convenience retail and service activities, and residential development. The residential component provides approximately 604 dwellings, including a significant proportion of terrace housing and apartments, increasing residential living opportunities within the centre and providing additional support for existing and proposed businesses and services.* *Given the complementary role of the proposed activities and the identified demand for additional LFR floorspace, the proposal is not expected to materially undermine the role, function or viability of other centres. On this basis, the proposal is considered consistent with MCZ-P6 from an economic perspective.* As further discussed in the *Urban Design Statement*, the proposal aligns with Policy MCZ-P6 by delivering a compact, mixed-use and well-connected extension to the metropolitan centre that reinforces its vibrancy, vitality and functionality. The integration of commercial, residential and open space uses, together with a legible movement network and a strong community focal point, contributes to a high amenity environment and a distinctive sense of place. Overall, the proposal supports intensification in a manner that is consistent with the role of the centre, enhances its efficiency and accessibility, and delivers a coherent and well-functioning urban outcome.
MCZ-P7 - HOUSING IN CENTRES Medium and high-density residential development will be enabled in centres where this: 1. Contributes towards accommodating anticipated growth in the District; 2. Offers a range of housing types, price, size and tenure that is accessible to people of all ages including the aging population and a range of 'lifestyles', cultures and abilities.	As further described in the *Urban Design Statement*, the proposal directly responds to MCZ-P7 by providing substantial medium and high-density residential development within the Metropolitan Centre. The approximately 604 dwellings will make a material contribution to accommodating anticipated residential growth in the District. A broad range of dwelling types and sizes is proposed, including apartments, townhouses, duplexes, courtyard housing and standalone dwellings, ranging from one to five bedrooms. This provides for different household sizes, ages, lifestyles and housing needs. The *Economic Assessment* also identifies that the proposal will serve a currently underrepresented market segment, including low to middle-income households, and provide *"comparatively affordable new housing in the Kāpiti Coast and the wider region".* As identified in the *Urban Design Statement*, this housing is integrated within a walkable, mixed-use environment, with access to open space, outlook and a well-connected movement network. Overall, the proposal will contribute significantly to housing supply and diversity within the Metropolitan Centre and is consistent with MCZ-P7.
MCZ-P8 - URBAN FORM AND DESIGN OF CENTRES Subdivision, use and development in centres must be undertaken in a manner that achieves efficient integration with necessary infrastructure, reinforces the District's consolidated urban form and sense of place, and provides for a high quality interface between built form and public space. A higher density of urban built form will be enabled in the Metropolitan Centre Zone, including buildings up to 15-storeys, where development fulfils the intent of the Centres Design Guide in Appendix 25.	As further described in the *Urban Design Statement*, the proposal provides an integrated and efficient extension of the District's primary centre, with the proposed movement network connecting new residential, commercial and open space activities to the existing urban area and necessary transport infrastructure. The proposed built form provides a deliberate range of densities and housing typologies. Approximately 37.5% of dwellings are apartments in buildings of varying heights up to 10 storeys, with the balance comprising terraces, duplexes and detached dwellings. Higher density development is focused around the community heart, reinforcing its legibility and supporting a compact urban form, while building heights have been informed by shading, parking and wider urban design considerations. As identified in the *Urban Design Statement,* the predominance of terrace housing "supports efficient intensification while enabling the delivery of a

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	cohesive, human-scaled environment", while the spatial structure retains the ability to accommodate further higher density development if future demand arises. The integrated street, open space and landscape network also provides a high-quality interface between built development and public spaces. Overall, the proposal reinforces the consolidated urban form of the Metropolitan Centre, provides for substantial residential intensification appropriate to the Zone, and achieves an integrated and high-quality urban environment consistent with MCZ-P8.
MCZ-P9 CONNECTIVITY TO AND WITHIN CENTRES Subdivision, use and development will be designed and located to enhance connectivity and access to public transport, shops and services and centres in general accordance with the following principles: 1. effective and efficient transport routes and facilities will connect new developments with the surrounding context; 2. public spaces and streets will be designed to support a mix of land uses and activities; 3. the provision of transport routes and nodes will be designed to integrate with adjoining land uses; 4. opportunities for active modes and integration with public transport routes will be provided for where it is appropriate; 5. missing transport links will be completed; 6. high traffic-generating activities and busy roads which divide centres or act as a physical barrier to the connectivity of a centre will be managed to avoid, remedy or mitigate adverse effects; and 7. landmarks and transport nodes will be linked with well-defined pedestrian pathways where appropriate.	As further described in the *Urban Design Statement*, connectivity is a key organising principle of the proposal and the development responds directly to the principles in MCZ-P9. The Link Road and Roads 2 and 3 provide effective connections between the development and the wider Metropolitan Centre, including Kāpiti Road, Iver Trask Place, the civic precinct and ultimately the railway station. Provision is also made to future-proof the potential Ihakara Street/Airport Link. The internal network provides a permeable and legible system of local streets and paths connecting residential areas with retail, services, open space and community destinations. The streets have been designed to reflect their movement and place functions and integrate with adjoining land uses. The Link Road accommodates wider town centre traffic, a future bus route, separated cycle facilities and shared paths, with bus stops located close to higher density residential and core activity areas. Road 3 provides a lower-speed, higher-amenity connection towards Iver Trask Place, including a shared path separated from vehicle crossings. The proposal also assists in completing missing links within the wider network. The Link Road provides an additional town centre connector/distributor, while the masterplan safeguards opportunities for future road and active-mode connections through adjoining KCDC land. A comprehensive walking and cycling network connects these routes with key destinations and transport nodes. Overall, the proposal provides an integrated multimodal network that improves connectivity within and beyond the Metropolitan Centre, supports public transport and active modes, completes and safeguards strategic connections, and integrates transport infrastructure with the proposed land uses. It is therefore consistent with MCZ-P9.
MCZ-P10 - PARAPARAUMU SUB-REGIONAL CENTRE Subdivision, use and development will contribute to a vibrant, well-connected and safe sub-regional centre at Paraparaumu which includes a wide mix of activities and has a high level of amenity. Subdivision, use and development in the Paraparaumu Sub-Regional Centre will be managed under two zones, supported by specific precinct areas, to ensure that: 1. the greatest intensity of building and activity occurs in the Metropolitan Centre Zone as part of Precincts A, B and C; and 2. the Mixed Use Zone at Kapiti Road and the Ihakara Street East and Ihakara Street West Precincts provides for peripheral centre activities and creates a buffer for more sensitive activities in adjoining zones.	The proposal will contribute to a vibrant, well-connected and high-amenity Paraparaumu Sub-Regional Centre through a substantial mix of residential, retail, commercial, open space and recreational activities, supported by an integrated transport and active-mode network. Importantly, the proposal locates this significant intensity of development within the Metropolitan Centre Zone and Precinct C, consistent with the policy direction that the greatest intensity of building and activity within the Sub-Regional Centre occurs within Precincts A, B and C. The proposed dwellings, including higher density apartments, together with LFR, specialty retail/commercial activities and associated public spaces, will reinforce the scale, diversity and function of the Metropolitan Centre. The *Economic Assessment* identifies the Site as *"one of the few remaining opportunities to expand the district's primary centre in a coordinated and efficient manner"* and concludes that the integrated mix of housing, employment, retail and services will enhance accessibility and improve the overall performance and efficiency of the primary centre. Importantly, it characterises the commercial component as an *"expansion of the Paraparaumu town centre, rather than a competing centre",* which will strengthen its role, scale and functionality by increasing its diversity, accessibility and critical mass. Overall, the proposal will strengthen the role of the Paraparaumu Sub-Regional Centre by concentrating substantial mixed-use development within the Metropolitan Centre Zone, consistent with MCZ-P10.
DISTRICT OBJECTIVES	
DO-01 TĀNGATA WHENUA	The Applicant has engaged with Te Ātiawa and Puketapu Hapū to understand their values and interests in the Site. Te Ātiawa is also engaging directly with

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
To work in partnership with the tāngata whenua of the District in order to maintain kaitiakitanga of the District's resources and ensure that decisions affecting the natural environment in the District are made in accordance with the principles of Te Tiriti o Waitangi (Treaty of Waitangi).	KCDC and GWRC, as well as the Applicant, regarding the Wharemaukū Stream and opportunities for further restoration. The proposed consent conditions provide opportunities for ongoing mana whenua involvement in ecological restoration and monitoring, supporting the exercise of kaitiakitanga.
DO-O2 ECOLOGY AND BIODIVERSITY To improve indigenous biological diversity and ecological resilience through: 1. protecting areas of significant indigenous vegetation, and significant habitats of indigenous fauna; 2. encouraging restoration of the ecological integrity of indigenous ecosystems; 3. enhancing the health of terrestrial and aquatic ecosystems; and 4. enhancing the mauri of waterbodies.	The proposal is consistent with this objective. The *Ecological Impact Assessment* does not identify any areas of significant indigenous vegetation or significant habitats of indigenous fauna affected by the proposal. While existing pastoral wetlands will be reclaimed, the proposed wetland compensation and extensive indigenous wetland and riparian restoration are anticipated to result in an overall net biodiversity gain. The restoration and enhancement of the Wharemaukū Stream corridor, together with the proposed ecological management measures, will improve the ecological integrity and resilience of terrestrial and aquatic habitats. Mana whenua involvement in the ecological works will also assist in recognising and enhancing the mauri of the Stream and associated wetland environment.
DO-03 DEVELOPMENT MANAGEMENT To maintain a consolidated urban form within existing urban areas and a limited number of identified growth areas which can be efficiently serviced and integrated with existing townships, delivering: 1. urban areas which maximise the efficient end use of energy and integration with infrastructure; 2. a variety of living and working areas in a manner which reinforces the function and vitality of centres; 3. an urban environment that enables more people to live in, and more businesses and community services to be located in, parts of the urban environment: a) that are in or near a Centre Zone or other area with many employment opportunities; or b) that are well serviced by existing or planned public or active transport; or c) where there is high demand for housing or for business land relative to other areas within the urban environment; while accommodating identified qualifying matters that constrain development; 4. resilient communities where development does not result in an increase in risk to life or severity of damage to property from natural hazard events; 5. higher residential densities in locations that are close to centres and public open spaces, with good access to public transport; 6. management of development in areas of special character or amenity in a manner that has regard to those special values; 7. sustainable natural processes including freshwater systems, areas characterised by the productive potential of the land, ecological integrity, identified landscapes and features, and other places of significant natural amenity; 8. an adequate supply of housing and areas for business/employment to meet the needs of the District's anticipated population which is provided at a rate and in a manner that can be sustained within the finite carrying capacity of the District; 9. management of the location and effects of potentially incompatible land uses including any interface between such uses; and 10. urban environments that support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.	The *Landscape and Visual Impact Assessment* states the following with respect to alignment of the proposal with this objective: *The proposal is located within the Metropolitan Centre Zone and represents an anticipated extension and intensification of the existing Paraparaumu urban environment. The mixed-use development provides for higher density residential, commercial and retail activities in close proximity to the town centre, supported by an integrated road, pedestrian, open-space and stormwater network.* *The proposal also responds to the site's natural and landscape features through the proposed treatment of landform, retention and naturalisation of the Wharemaukū Stream in its existing alignment, offsetting and compensation of wetlands, and provision of connected open spaces and planting. Overall, it is considered that the proposal supports urban form while recognising and managing the landscape and amenity values of the site.* The proposal is strongly aligned with DO-O3. It provides for substantial residential and business growth within an existing Metropolitan Centre Zone, thereby consolidating development within the existing Paraparaumu urban area rather than promoting outward urban expansion. The proposal provides 593 dwellings alongside LFR, specialty retail/commercial and employment activities within the District's primary centre. The *Economic Assessment* identifies the Site as *"one of the few remaining opportunities to expand the district's primary centre in a coordinated and efficient manner",* with the integrated mix of housing, employment, retail and services enhancing accessibility and the overall performance and efficiency of the centre. This directly supports the objective's directions to provide a variety of living and working environments, reinforce the vitality of centres, and locate additional people and businesses close to employment and services. The location and form of development also support efficient integration with existing and planned infrastructure and transport networks. Higher density housing is provided within the Metropolitan Centre and close to public open space, employment, retail and services, with the proposed Link Road, public transport provision and comprehensive pedestrian and cycle network supporting transport choice and reduced reliance on private vehicles. The proposal also makes a significant contribution to identified housing and business demand. The *Economic Assessment* identifies an existing shortage of medium-term greenfield residential capacity and concludes that the proposal would increase remaining capacity from approximately 6.2 years to 8.7 years. It similarly identifies an existing and projected demand for additional LFR floorspace, with the proposed LFR provision broadly aligning with projected medium to long-term demand. Potential interfaces between residential, commercial and higher traffic-generating activities have been addressed through the comprehensive masterplan, including the distribution of land uses, road hierarchy, landscaping and open space network. Natural hazard, stormwater and ecological considerations are similarly integrated into the development through flood storage and stormwater management, the retention and naturalisation of the

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	Wharemaukū Stream, wetland offsetting and compensation, and the connected open space network. Overall, the proposal represents the type of consolidated, integrated mixed-use growth expressly sought by DO-O3: accommodating substantial additional housing, business and employment activity within the District's primary centre, while integrating development with infrastructure, transport, open space and the site's natural systems.
DO-O20 - WELL-FUNCTIONING URBAN ENVIRONMENTS A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	As addressed in detail in the NPS-UD assessment in Section 8, the proposal will contribute to a well-functioning urban environment. In summary, it provides substantial additional housing capacity and a diverse range of housing typologies within the Metropolitan Centre, alongside employment, retail and commercial activities, public open space and recreational opportunities. The proposal provides good accessibility between housing, employment, services and amenities through an integrated movement network that supports walking, cycling and public transport. The mix and distribution of activities, together with the proposed open space, wetland and landscape network, will support a compact, connected and high-amenity urban environment. For the reasons set out in the NPS-UD assessment, the proposal will enable people and communities to provide for their social, economic and cultural wellbeing, and their health and safety, now and into the future, and is consistent with DO-O20.
DO-O4 – COASTAL ENVIRONMENT To have a coastal environment where: 1. areas of outstanding natural character and high natural character, outstanding natural features and landscapes, areas of significant indigenous vegetation, and significant habitats of indigenous fauna are identified and protected; 2. areas of outstanding natural character and high natural character are restored where degraded; 3. the effects of inappropriate subdivision, use and development are avoided, remedied, or mitigated; 4. public access to and along the coast to facilitate active and passive recreational use is maintained and enhanced while managing inappropriate vehicle access; and 5. Inappropriate development does not result in further loss of coastal dunes in the area mapped as the coastal environment.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The site is not identified as an Outstanding Natural Feature or Landscape; however, the Wharemauku Stream, wetlands and the existing dune landforms do contribute to the landscape and coastal character of the receiving environment. The proposal will modify some of these features, including removing the eastern dune and reshaping the western dune. The eastern dune has a relatively small and localised influence on the wider receiving environment, while the more prominent western dune modified, with a realigned landform extending from the former southern extent of the dune along the Kāpiti Expressway boundary.. The Wharemauku Stream, wetlands and associated planting will also be enhanced as part of the wider open space and reserve network.* *Overall, while there will be a loss of part of the existing dune system, the proposal retains and enhances other key natural character features and provides mitigation through landform design, native planting and restoration of waterways and wetlands.* While the proposal will result in the loss and modification of existing dune landforms, this needs to be considered in the context of the Site's Metropolitan Centre zoning and the substantial urban development expressly anticipated within Precinct C. As addressed in the *Landscape and Visual Impact Assessment*, the eastern dune has a relatively small and localised influence, while elements of the more prominent western dune landform are reinterpreted through the proposed landform adjoining the Kāpiti Expressway. Native planting, wetland enhancement and restoration of the Wharemaukū Stream provide further mitigation and enhancement of natural character across the Site. Importantly, clause (5) seeks to prevent further dune loss arising from "inappropriate development", rather than directing that all existing dune landforms within the Coastal Environment be retained irrespective of the planned urban outcomes for the Site. In this case, the proposal is a comprehensive development of Metropolitan Centre-zoned land, with effects on the dune system managed through the overall landscape, ecological and open space response. For the reasons set out above, the development is not considered inappropriate in this location. Overall, although dune loss will occur, the proposal appropriately manages those effects while retaining and enhancing other important natural character features of the Site and is considered consistent with DO-O4.
DO-O5 - NATURAL HAZARDS To ensure the safety and resilience of people and communities by avoiding exposure to increased levels of risk from natural hazards,	The geotechnical and flood hazards associated with the Proposal have been assessed by Torlesse Ltd and Envelope Engineering, respectively. The *Geotechnical Assessment* confirms that, subject to the recommended ground improvement, foundation design and construction measures, the

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
while recognising the importance of natural processes and systems.	identified geotechnical hazards present a low risk to the proposed development and adjoining land and infrastructure, and are unlikely to be worsened by the Proposal. The *Flood Risk Assessment* identifies extensive existing flooding associated with the Wharemaukū Stream and wider drainage network. The Proposal incorporates earthworks, reconfigured drainage networks and consolidated flood storage within the proposed wetland and flood management areas. Modelling indicates that approximately 26,000m³ of additional flood storage will be provided, with flood levels generally maintained or reduced on surrounding land and low flood hazard risk within the proposed development areas. The proposed KCDC Consent Conditions require further modelling at the Engineering Approval stage to confirm the final design and effects on surrounding land. Overall, the Proposal is considered to appropriately manage natural hazard risks without increasing risks to people, property or surrounding infrastructure, consistent with DO-O5.
DO-08 STRONG COMMUNITIES To support a cohesive and inclusive community where people: 1. have easy access and connectivity to quality and attractive public places and local social and community services and facilities; 2. have increased access to locally produced food, energy and other products and resources; 3. have improved health outcomes through opportunities for active living or access to health services; and 4. have a strong sense of safety and security in public and private spaces.	The proposal is consistent with DO-O8. The comprehensive open space and movement network provides convenient access to a range of public spaces, including the central plaza, neighbourhood play spaces, wetland and stream corridors and recreational trails. The connected pedestrian, shared path and cycle network supports active living and provides safe, convenient connections between residential areas, shops, services, public transport and the wider Metropolitan Centre. The mix of residential, commercial and recreational activities also creates opportunities for day-to-day needs to be met locally. Safety and security are supported through the legible street network, active frontages, passive surveillance of streets and public spaces, and well-defined pedestrian and cycle routes. Overall, the proposal will provide a connected, active and high-amenity environment that supports community wellbeing and is consistent with DO-O8.
DO-O9 - LANDSCAPES, FEATURES AND LANDFORMS To protect the District's identified outstanding natural features and landscapes from inappropriate subdivision, use and development; and 1. maintain or enhance the landscape values of special amenity landscapes and identified significant landforms; and 2. avoid, remedy or mitigate adverse effects of earthworks on natural features and landforms.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The site is not identified as an Outstanding Natural Feature or Landscape or Special Amenity Landscape; however, the existing dune landforms contribute to the site's landscape character. The proposal will remove the smaller eastern dune and modify the more prominent western dune, with a realigned landform extending from the former southern extent of the dune along the Kapiti Expressway boundary. While the eastern dune has a relatively localised influence on the wider receiving environment, the new landform will be reformed as a recognisable landform adjacent to the Kapiti Expressway. It will be planted with native vegetation to help integrate the earthworks with the natural and landscape character of the wider site. Overall, the proposal will attempt to manage the effects of earthworks on the site's natural landforms through landform design and landscape mitigation where practical.* The proposal is considered consistent with DO-O9. While the existing dune landforms contribute to the Site's landscape character and will be modified, the effects of the associated earthworks are addressed through the proposed landform design and landscape mitigation. In particular, the more prominent western dune is reinterpreted through a new landform adjoining the Kāpiti Expressway, with native planting assisting its integration into the wider landscape. The smaller eastern dune has a more localised influence on the receiving environment. Overall, adverse effects on natural landforms have been mitigated where practicable through landform design and planting, consistent with DO-O9.
DO-O10 - CONTAMINATED LAND To prevent or mitigate any adverse environmental effects, including risks to human health and the environment, arising from past, present or future activities involving contaminated land.	The proposal is consistent with this objective. The *Preliminary Site Investigation* identifies potential sources of contamination associated with the historical use of the site and recommends further investigation and appropriate management during development. These recommendations have been incorporated into the draft consent conditions and will ensure that potential risks to human health and the environment are appropriately managed.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
DO-011 CHARACTER AND AMENITY VALUES To recognise the unique character and amenity values of the District's distinct communities, while providing for character and amenity values to develop and change over time in response to the diverse and changing needs of people, communities and future generations, resulting in: 1. residential areas characterised by the presence of mature vegetation, a variety of built forms and building densities, the retention of landforms, and the recognition of unique community identities; 2. vibrant, lively metropolitan and town centres supported by higher density residential and mixed use areas; 3. local centres, village communities and employment areas characterised by high levels of amenity, accessibility and convenience; 4. productive rural areas, characterised by openness, natural landforms, areas and corridors of indigenous vegetation, and primary production activities; and 5. well managed interfaces between different types of land use areas (e.g. between living, working and rural areas) and between potentially conflicting land uses, so as to minimise adverse effects.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The proposal will change the site from an open, undeveloped landscape to a more intensive urban environment; however, this change is expected within the Metropolitan Centre zoning and Structure Plan, which anticipate higher density residential and mixed-use development. The proposed open-space network, planting, pedestrian connections and wider landscape framework will provide amenity and help establish a distinct urban character. While the eastern dune will be removed, the new western landform, Wharemauku Stream, wetlands and associated landscape treatment will increase amenity and natural landscape values across the site. Overall, the proposal will allow the site's character and amenity values to evolve in a manner consistent with the anticipated Metropolitan Centre environment.* The proposal is considered consistent with DO-O11. While the Site will change substantially from its existing undeveloped character, this change is expressly anticipated by the Metropolitan Centre zoning and Structure Plan, which provide for higher density residential and mixed-use development. As described in the *Urban Design Statement,* the proposal establishes a varied and distinctive urban environment through a range of building typologies and densities, a landscaped street and open space network, and a defined *"community heart"* with higher density housing, active edges and public spaces. Existing landscape characteristics are also reflected through the proposed elevated western landform, views and connections towards Kāpiti Island, enhancement of the Wharemaukū Stream and wetlands, and integration of swales and rain gardens within the public realm. Interfaces between potentially conflicting activities are managed through the distribution of land uses, landform and landscaping, including the interface between LFR activities, Kāpiti Road and nearby residential areas. Overall, the proposal provides for the Site's character and amenity to evolve in a manner consistent with the higher density, mixed-use environment anticipated for the Metropolitan Centre.
DO-012 HOUSING CHOICE AND AVAILABILITY To meet diverse community needs by increasing the amount of housing that: 1. is of densities, locations, types, attributes, size and tenure that meets the social and economic wellbeing needs of households in suitable urban and rural locations; 2. is affordable and adequate for lower income households; and 3. can respond to the changing needs of residents, regardless of age, mobility, health or lifestyle preference; while enhancing the amenity of living environments and contributing to the sustainability of communities and compatibility with the goals of environmental sustainability, in particular resource, water and energy efficiency.	The proposal is consistent with DO-O12. It provides approximately 604 additional dwellings within the Metropolitan Centre across a diverse range of typologies, including detached houses, duplexes, terraces and apartments, providing different dwelling sizes, price points and lifestyle options to respond to a range of household needs. The higher residential density and central location provide convenient access to employment, shops, services, open space and transport choices. The *Economic Assessment* also identifies that the proposal will meet the needs of currently underrepresented market segments, including low to middle-income households, and provide comparatively affordable new housing within Kāpiti Coast and the wider region. The proposal also supports environmental sustainability through a compact mixed-use urban form, provision for walking, cycling and public transport, nature-based stormwater management, wetland restoration and rainwater tanks for dwellings/buildings. Overall, the proposal will materially increase housing supply and choice while providing a high-amenity and more sustainable living environment, consistent with DO-O12.
DO-013 INFRASTRUCTURE To recognise the importance and national, regional and local benefits of infrastructure and ensure the efficient development, maintenance and operation of an adequate level of social and physical infrastructure and services throughout the District that: 1. meets the needs of the community and the region; and 2. builds stronger community resilience, while avoiding, remedying or mitigating adverse effects on the environment.	The proposal is consistent with DO-O13. The development is supported by transport, three-waters, and other network infrastructure necessary to service the proposed residential and commercial activities. The proposed Link Road and wider road network will also provide broader connectivity benefits within the Metropolitan Centre, including provision for public transport and active modes. Stormwater and flood management infrastructure is integrated with the wetland and open space network, providing flood storage, water quality, ecological and amenity benefits and contributing to community resilience. Overall, the proposal provides the infrastructure necessary to support substantial planned growth within the Metropolitan Centre, while integrating infrastructure with the wider urban and natural environment and managing associated adverse effects.
DO-014 ACCESS AND TRANSPORT To ensure that the transport system in the District:	The *Integrated Transport Assessment* states the following with respect to this objective:

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
1. integrates with land use and urban form and maximises accessibility; 2. improves the efficiency of travel and maximises mode choice to enable people to act sustainably as well as improving the resilience and health of communities; 3. contributes to a strong economy; 4. avoids, remedies or mitigates adverse effects on land uses; 5. does not have its function and operation unreasonably compromised by other activities; 6. is safe, fit for purpose, cost effective and provides good connectivity for all communities; and 7. provides for the integrated movement of people, goods and services.	*Each of these overarching objectives are captured in the respective Transport Policies 1-7, for which an assessment of the proposals alignment against each is described in the transport policies.* The proposal is considered consistent with DO-O14. As detailed in the *Integrated Transport Assessment*, the proposed transport network is integrated with the land use and urban form and provides strong connections to Kāpiti Road, Iver Trask Place and the wider Metropolitan Centre. The Link Road and local road network accommodate vehicle and servicing demands while providing dedicated cycle facilities, shared paths, pedestrian connections and provision for public transport. The ITA demonstrates that anticipated traffic demands can be accommodated, with Safe System principles informing the design. Overall, the proposal provides a safe, connected and multimodal transport network that supports accessibility, mode choice and the integrated movement of people, goods and services.
DO-015 ECONOMIC VITALITY To promote sustainable and on-going economic development of the local economy, including the rural sector, with improved number and quality of jobs and investment through: 1. a. encouraging business activities in appropriate locations within the District, principally through differentiating and managing various types of business activities both on the basis of the activity, and the potential local and strategic effects of their operation; b. reinforcing a compact, well designed and sustainable regional form supported by an integrated transport network; c. enabling opportunities to make the economy more resilient and diverse; d. providing opportunities for the growth of a low carbon economy, including clean technology; e. minimising reverse sensitivity effects on business activities, including primary production activities ; and f. enhancing the amenity of Working Zones; while: 2. a. ensuring that economic growth and development is able to be efficiently serviced by infrastructure; b. encouraging commercial consolidation and the co-location of community services and facilities primarily within the Paraparaumu Sub-Regional Centre and Town Centres; and c. managing contamination, pollution, odour, noise and glare, associated with business activities, including primary production activities.	The proposal is consistent with DO-O15. It provides substantial new residential, retail and commercial development within the Paraparaumu Sub-Regional Centre, consolidating business activity in an appropriate location and supporting a compact urban form integrated with the transport network. As identified in the *Economic Assessment*, the proposal will support employment and economic activity, respond to identified demand for additional LFR and housing, improve access to goods and services, and help retain expenditure within the District. The mix of housing, employment, retail and services will also increase the diversity and resilience of the local economy. The development is supported by the necessary infrastructure, while the masterplan, landscaping and distribution of land uses manage interfaces between business and residential activities. Overall, the proposal will strengthen the economic role and function of the Paraparaumu Sub-Regional Centre and is consistent with DO-O15.
DO-O16 - CENTRES To have vibrant, safe and economically sustainable centres that function as key employment and economic nodes and as a focus for social and community life, as public transport and local service hubs, and as places for living, entertainment and recreation that: 1. provide the primary focus for commercial (excluding industrial), retail and community activities within the District; 2. support community cohesion and a sense of place; 3. reinforce a compact, well designed and sustainable District and regional form, through promoting and reinforcing a close proximity and good accessibility between living, business and employment areas; 4. encourage economic opportunities and business activities in a manner which promotes a) the Paraparaumu Sub-Regional Centre as the principal commercial, retail, cultural, civic and tourist centre for the District, to be developed in a manner that:	The Proposal is consistent with DO-O16. It will strengthen the Paraparaumu Sub-Regional Centre through a substantial mix of residential, retail, commercial, community and recreational activities within Precinct C, supporting its role as the District's principal centre. As described in the *Urban Design Statement*, the proposal establishes a clear *"community heart"* supporting social interaction and sense of place, together with a well-connected multimodal network linking the development with the wider Metropolitan Centre and community facilities. The proposal also provides substantial higher density living, including six apartment buildings, some up to 10 storeys, alongside a broader range of housing typologies. The proposed retail and commercial activities complement the wider centre, while the scale and nature of retail within Precinct C has been appropriately managed as addressed in the *Economic Assessment*. Overall, the proposal provides the integrated mix of activities, higher density housing, connectivity and quality urban environment expressly anticipated for the Paraparaumu Sub-Regional Centre and is consistent with DO-O16.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
i. achieves an integrated and compact Metropolitan Centre Zone, linking all Precincts through a well-connected pedestrian and transport networks offering a choice of efficient routes and a quality built environment; ii. provides for a broad range of mutually compatible activities that are integrated with pedestrian and public transport; iii. is supported by opportunities for higher density residential living; iv. consolidates community activities within Precinct B; and v. provides for commercial (excluding industrial) and retail activities in Precincts A1, A2 and C, with some restrictions on the scale and nature of retail activities in Precinct C b) the District's town centres at a scale and form that provides the urban focus for the commercial (excluding industrial), tourism, education, entertainment, community and civic activities as well as opportunities for higher density residential living, where these meet the needs of the surrounding township community; and c) District's local centres to provide for commercial activities (excluding industrial activities), within a residential context, to primarily serve the local convenience, community and commercial needs of the surrounding residential community. 5. provide for higher density urban built character and high-quality development, including: a) buildings up to 15-storeys within the Metropolitan Centre Zone; b) buildings up to 6-storeys within: i. the Town Centre Zone; ii. the Ihakara Street West, Ihakara Street East and Kapiti Road precincts of the Mixed Use Zone; iii. the Local Centre Zone at Paekākāriki; and c) buildings up to 4-storeys within the Local Centre Zone.	
DO-017 OPEN SPACES / ACTIVE COMMUNITIES To have a rich and diverse network of open space areas that: 1. is developed, used and maintained in a manner that does not give rise to significant adverse effects on the natural and physical environment; 2. protects the District's cultural, ecological and amenity values, while allowing for the enhancement of the quality of open space areas; 3. supports the identity, health, cohesion and resilience of the District's communities; and 4. ensures that the present and future recreational and open space needs of the District are met.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The proposal incorporates a connected network of open spaces, recreational reserves, playgrounds and walkways, integrated with Wharemauku Stream, wetlands and the wider reserve and green space network. These spaces will improve accessibility and recreational opportunities while contributing to landscape amenity, ecological enhancement and provide the development with a defined identity for the development. Native planting, naturalisation and enhancement of the Wharemaukū Stream corridor, wetland areas and associated landscape treatment will further support a varied, high-amenity and well-connected open-space framework.* The proposal is consistent with DO-O17. As described in the *Landscape and Visual Impact Assessment*, it provides a connected and diverse network of open spaces, recreational reserves, playgrounds and walkways integrated with the Wharemaukū Stream, wetlands and wider green space network. These spaces provide accessible opportunities for recreation and active living while supporting community identity and cohesion. Native planting, wetland enhancement and naturalisation of the Wharemaukū Stream corridor will also enhance ecological and landscape values and contribute to a high-amenity open space network. Overall, the proposal will materially increase the quantity, quality and accessibility of open space within this part of the Metropolitan Centre and

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	support the present and future recreational needs of the community, consistent with DO-O17.
DO-O18 RENEWABLE ENERGY, ENERGY EFFICIENCY AND CONSERVATION Increase the development and use of energy from renewable sources, including on-site systems, and efficiency and conservation of energy use while avoiding, remedying or mitigating adverse effects on the environment.	The proposal is consistent with this objective. The compact, higher-density urban form and site layout support efficient use of land and infrastructure and reduce reliance on private vehicle travel through strong walking and cycling connections and proximity to the Metropolitan Centre and public transport. The proposal also incorporates rainwater tanks for residential development, supporting more efficient use and conservation of resources.
DO-O19 - HOUSING BOTTOM LINES To achieve sufficient development capacity as required by the National Policy Statement on Urban Development 2020 by meeting housing bottom lines of: 1. 5,477 additional residential units over the short-medium term (2021–2031); and 2. 8,411 additional residential units over the long term (2031–2051).	The proposal is consistent with DO-O19. It will provide approximately 604 additional dwellings within the Metropolitan Centre, making a material contribution towards the District's identified short-medium and long-term housing requirements. As identified in the *Economic Assessment*, the proposal will also increase available greenfield housing capacity and help address an identified shortage of medium-term capacity. The range of dwelling typologies and densities will further support delivery across different segments of the housing market.
BUSINESS ACTIVITIES	
BA-P1 - MANAGEMENT OF BUSINESS ACTIVITIES Business activities within the District will be managed to enable consolidated, efficient and integrated business areas within identified zones and precinct areas, to: 1. provide the community with convenient access to goods and services, and opportunities for employment and social interaction; 2. ensure an adequate supply of land to meet commercial and industrial demands so as to encourage economic growth and development; 3. integrate with the provision of strategic and community infrastructure, including the transport network; 4. limit development where environmental constraints or servicing capacity inadequacies exist, unless these issues can be adequately addressed; and 5. manage the effects of the distribution of business activities, through: a) providing for a range of retail and commercial activities (excluding industrial activities) to meet the community's social and economic needs, principally within identified centres, and primarily at the Paraparaumu Sub-Regional Centre within the Metropolitan Centre Zone and the Town Centre Zone, with more localised needs provided for within the Local Centre Zone; b) providing for a range of industrial activities, principally in the General Industrial Zone, where their scale and extent of effects can be appropriately catered for, whilst meeting the District's economic needs.	The proposal is consistent with BA-P1. It consolidates substantial new retail and commercial activity within the Paraparaumu Sub-Regional Centre and Metropolitan Centre Zone, being the location specifically identified by the policy as the primary focus for such activities. The proposed LFR and specialty retail/commercial activities will increase access to goods, services and employment and respond to identified demand for additional commercial floorspace. These activities form part of an integrated mixed-use development supported by the proposed transport, three-waters and other infrastructure networks. As addressed in the *Economic Assessment*, the proposal will strengthen the role and function of the Paraparaumu Sub-Regional Centre rather than establish a competing centre.
BA-P3 - CONSOLIDATION OF BUSINESS ACTIVITIES Business activities will be managed to consolidate activities in centres and other Working Zones in accordance with the following principles: 1. retail activity will be primarily focused within the Metropolitan Centre Zone, Town Centre Zone and Local Centre Zone, and otherwise managed to avoid the dispersal of business activity which would be detrimental to the efficient operation, function, viability and sustainability of the District's centres; 2. commercial activities (excluding retail and industrial activities), including offices, will be consolidated in the Metropolitan Centre Zone, Mixed Use Zone, Town Centre Zone and Local Centre Zone, and will be only provided for in	The proposal is consistent with BA-P3. The proposed retail and commercial activities are located within the Metropolitan Centre Zone, directly supporting the policy direction to consolidate these activities within established centres rather than disperse them elsewhere in the District. The proposal makes efficient use of Metropolitan Centre-zoned land and integrates new business activities with substantial residential development, existing and proposed infrastructure, and the wider transport network. As addressed in the *Economic Assessment*, the commercial component represents an expansion of the Paraparaumu town centre, rather than a competing centre, strengthening its diversity, accessibility and critical mass.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
the General Industrial Zone where they are ancillary to industrial activities and otherwise managed to avoid detrimental effects on the efficient operation, function, viability and sustainability of the District's centres; 3. industrial activities will be primarily located in the General Industrial Zone; 4. providing for a range of business activities to be undertaken in the Airport Zone where: a) they remain compatible with aircraft operations; b) they avoid reverse sensitivity effects on industrial activities undertaken at the Airport; c) retail activities are limited in type and scale to ensure that the Airport Mixed Use Precinct is complementary to the role and function of the Sub-Regional Centre; and d) do not adversely affect the Centres Hierarchy and the role and function of individual centres; and development within existing Working Zones will be encouraged to make efficient use of buildings, land and existing investment in public infrastructure, utilities, transport and other facilities.	
URBAN AND ENVIRONMENTAL DESIGN AND INCENTIVES	
UEDI – P1: URBAN DESIGN Quality urban design outcomes will be promoted so that public and private places and spaces: 1. are liveable and safe; 2. enhance the local economy, environment and community; 3. are sustainable, enduring and resilient; 4. provide a strong sense of place reflecting cultural values and distinct community identities; 5. are enjoyable, comfortable, welcoming and provide a diversity of experiences; and 6. are easy to move around and through, by encouraging a well-connected and integrated transport network; 7. at all levels of urban design, from macro (urban structure and subdivision) to micro (building details and materials) scale.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The proposed mixed-use development has an integrated network of streets, pedestrian connections and open-spaces that support accessibility, recreation and a high level of amenity. The layout incorporates residential, commercial and retail activities alongside reserves, waterways, planting and public spaces, helping to create a varied and legible urban environment. The proposed landscape response, including the open-space network, Wharemaukū Stream and wetland enhancements, new landform and landscape treatment, will contribute to a strong sense of place and support the long-term quality and amenity of the development.* The *Urban Design Statement* similarly demonstrates that the proposal has been comprehensively designed at both the broader urban structure and individual precinct scales. The development establishes a legible and connected movement network, concentrates greater density and mixed-use activity around the Town Centre, provides a range of housing typologies, and integrates development with streets, open spaces, the central swale and restored Wharemaukū Stream corridor. Walking and cycling connections are provided throughout the site and connect with the surrounding transport network and wider Metropolitan Centre.
UEDI- P2: SAFETY CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN Development, use and subdivision will be consistent with the Subdivision and Development Principles and Requirements 2012 and Crime Prevention through Environmental Design (CPTED) Guidelines to enhance safety and security of residents and visitors.	The proposal is consistent with UEDI-P1. As described in the *Landscape and Visual Impact Assessment* and *Urban Design Statement,* the proposal adopts a comprehensive design approach integrating built form, streets, open spaces, landscape and movement networks. A clear community heart, active frontages and a diverse range of public spaces will support a liveable, safe and welcoming environment. The connected street, pedestrian and cycle network provides legible and convenient movement through the development and connects with the wider Metropolitan Centre. The Wharemaukū Stream and wetland enhancements, landscaped open space network, planting and reinterpreted dune landform contribute to a distinctive sense of place and long-term amenity and resilience.
URBAN FORM AND DEVELOPMENT	
UFD-P14 - URBAN BUILT FORM Provide for heights and densities of urban built form that enable more people to live in, and more businesses and community services to be located in, the District's urban environments, by:	The proposal is consistent with UFD-P14. It provides substantial intensification within the Metropolitan Centre Zone, being the location where the District Plan expressly anticipates and enables the greatest building heights and densities, including buildings up to 15 storeys. Approximately 604 dwellings are proposed across a range of typologies and densities, including detached and courtyard housing, duplexes, townhouses

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
1. enabling the greatest building heights and densities in the Metropolitan Centre Zone, including buildings up to 15-storeys; 2. enabling greater building heights and densities in the following areas: a) building heights up to 10-storeys in the High Density Residential Zone and Mixed Use Zone adjacent to the Metropolitan Centre Zone; b) building heights up to 6-storeys in: i. the Town Centre Zone (except for the Ōtaki Main Street Town Centre Zone); ii. the High Density Residential Zone located within a walkable catchment of the train stations at Paekākāriki, Paraparaumu and Waikanae; iii. the High Density Residential Zone adjacent to the Town Centre Zones at Waikanae, Paraparaumu Beach; c) building heights up to 4-storeys in: i. The Local Centre Zone; ii. The General Residential Zone adjacent to the Town Centre Zones at Ōtaki and Raumati Beach; iii. The General Residential Zone adjacent to the Local Centre Zone; 3. enabling a variety of building heights and densities in the General Residential Zone, including buildings up to 3-storeys; while accommodating identified qualifying matters that constrain development.	and six apartment buildings, some reaching approximately 10 storeys. This residential intensification is integrated with retail, commercial, employment and community activities, enabling significantly more people and businesses to locate within the District's primary centre and close to existing services, employment and transport infrastructure. As described in the *Urban Design Statement*, the proposed building heights and densities represent a deliberate response to urban design, staging and market considerations. Higher density development is concentrated around the community heart and key movement corridors, reinforcing the legibility and vitality of the centre, while the predominance of terrace housing supports *"efficient intensification while enabling the delivery of a cohesive, human-scaled environment."* Importantly, the spatial structure also retains the ability to accommodate further higher-density development over time should demand arise. While the proposal does not utilise the full 15-storey height enabled within the Metropolitan Centre Zone, UFD-P14 enables rather than requires development to that height. The proposal nevertheless delivers a significant increase in residential and business density and makes efficient use of centrally located Metropolitan Centre land.
UFD-P1 – GROWTH MANAGEMENT New urban development for residential activities will only be located within existing urban areas, identified growth areas, and areas that can be efficiently serviced and integrated with existing urban areas, and will be undertaken in a manner which: 1. supports the District's consolidated urban form; 2. maintains the integrity of the urban edge north of Waikanae and Ōtaki; 3. manages residential densities by: a) providing for a variety of housing types and densities in the residential zones; b) enabling increased housing densities: i. in, and within a walkable catchment of the Metropolitan Centre Zone; ii. within a walkable catchment of the train stations at Paekākāriki, Paraparaumu and Waikanae; and iii. in and adjacent to the Town Centre Zone and Local Centre Zone; while accommodating identified qualifying matters that constrain development; 4. avoids urban expansion that would compromise the distinctiveness of existing settlements and unique character values in the rural environment between and around settlements; 5. can be sustained within and makes efficient use of existing capacity of public services and infrastructure (including additional infrastructure), or is integrated with the planned capacity of public services and infrastructure and the likely availability of additional infrastructure; 6. promotes the efficient use of energy and water;	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The proposal is located within the existing Paraparaumu urban area and Metropolitan Centre Zone, where further residential and mixed-use development is anticipated. It will support a consolidated urban form by providing increased residential density close to the town centre, employment opportunities, parks reserves and other open space areas and public transport connections. The development will also integrate with the surrounding urban area through new roads, pedestrian and cycling connections, and open-space and stormwater networks. Overall, it is considered that the proposal is consistent with the planned growth and intensification of the Metropolitan Centre and supports the efficient use of land and existing infrastructure.* The proposal is consistent with UFD-P1. It provides substantial new residential development within the existing Paraparaumu urban area and Metropolitan Centre Zone, directly supporting the District's consolidated urban form and the policy direction to enable increased housing densities in and within walking distance of the Metropolitan Centre and Paraparaumu railway station. Approximately 604 dwellings are proposed across a range of typologies and densities, including detached and courtyard housing, duplexes, townhouses and apartments. This provides housing choice while making efficient use of centrally located urban land close to employment, retail, services, open space and public transport. The development is integrated with existing and proposed infrastructure through the new road and active-mode network and comprehensive three-waters servicing. The compact mixed-use form, provision for walking, cycling and public transport, nature-based stormwater management and rainwater storage also support more efficient use of transport, energy and water resources. The provisions relating to the urban edges of Waikanae and Ōtaki and rural settlement character are not relevant to the Site.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
7. manages reverse sensitivity effects on existing lawfully established non-residential activities.	
UFD-P2 HOUSING CHOICE An increased mix of housing forms, types, sizes and tenures will be encouraged within parts of the District where increased variety and densities of housing are able to cater for changing demographics, while encouraging high quality development. This will include provision for: smaller household sizes, typologies and residential units; 1. the housing and care needs of the ageing population; 2. supported living accommodation; 3. papakāinga; 4. shared and group accommodation, including community housing and multi-generational living; 5. transitional and emergency housing; 6. minor residential units; and 7. a range of allotment sizes and land tenure arrangements to facilitate these typologies.	The proposal is consistent with UFD-P2. It provides a substantial increase in housing choice within the Metropolitan Centre, comprising approximately 604 dwellings across a broad range of typologies and sizes, including apartments, townhouses, duplexes, courtyard housing and detached dwellings. The proposed dwellings range from one to five bedrooms, with a significant proportion comprising apartments and terraced housing. This provides for smaller households as well as families and a range of household compositions, lifestyles and changing demographic needs. The variety of dwelling forms and allotment arrangements also provides opportunities for different price points and tenure arrangements. As identified in the *Economic Assessment*, the proposal will help meet the needs of currently underrepresented market segments, including low to middle-income households, and provide comparatively affordable new housing within Kāpiti Coast and the wider region. Overall, the proposal will materially increase both the supply and diversity of housing in a highly accessible Metropolitan Centre location, while providing a high-quality living environment.
UFD-P3 - MANAGING INTENSIFICATION The effects of residential intensification on character and amenity values will be assessed where provided for in the District Plan, while recognising that character and amenity values may develop and change over time in response to the diverse and changing needs of people, communities and future generations.	The Proposal is consistent with UFD-P3. It will result in a substantial change from the Site's existing undeveloped character through the introduction of medium and higher density residential development; however, this change is expressly anticipated within the Metropolitan Centre Zone, where significant intensification is enabled. As addressed in the *Urban Design Statement* and *Landscape and Visual Impact Assessment*, amenity is maintained through a varied built form, landscaped streets, open spaces, planting, pedestrian connections and appropriate transitions between residential, commercial and LFR activities. Higher density development is focused around the community heart and key movement corridors, supporting a coherent and high-amenity urban environment. Overall, the resulting change in character and amenity is consistent with the planned evolution and intensification of the Metropolitan Centre anticipated by UFD-P3.
UFD-P4 - RESIDENTIAL DENSITY The density of subdivision and development will be managed through area-specific provisions to achieve an appropriate range of housing types, density and built form across the District.	The Proposal is consistent with UFD-P4. It provides approximately 604 dwellings across a range of housing types and densities, including detached and courtyard housing, duplexes, townhouses and apartments. The distribution of density responds to the Site's Metropolitan Centre Zone and Precinct C provisions, with higher density development concentrated around the community heart and key movement corridors and lower-scale housing providing transitions across the Site. This provides a varied built form while achieving the substantial residential intensification anticipated within the Metropolitan Centre.
UFD-P7 ACCESSIBILITY Subdivision, land use and development will be undertaken in a manner which enables all urban residences to have access to public open space within a distance of 400 metres.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The proposal will provide a well-connected network of public open spaces, reserves and walkways with public open space accessible within 400 m of the residential areas throughout the development. These connections will support walking, passive recreation and movement through the site, while significantly improving public access compared with the existing situation where there is currently no formal public access across the site.* The proposal is considered consistent with UFD-P7. As confirmed in the Landscape and Visual Impact Assessment, all residential areas will have access to public open space within 400m through the proposed network of reserves, open spaces and walkways. The connected open space network will support walking, passive recreation and movement throughout the development, while significantly improving public access compared with the existing Site, where no formal public access is currently available.
UFD-P8 - PARKS AND NEW DEVELOPMENT	The Proposal is consistent with UFD-P8. It provides a network of new publicly accessible open spaces, including neighbourhood play spaces, the central

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
1. New publicly accessible local parks which are of a size, shape and location that meet the open space and recreational needs of the Community will be provided within new subdivisions; and 2. New parks or upgrades to parks will be provided for to accommodate open space and recreational demand created by infill housing.	plaza, recreational reserves and the wider wetland and Wharemaukū Stream open space network. These spaces are distributed throughout the development and connected by pedestrian and shared path networks, providing accessible opportunities for play, passive recreation and community interaction to meet the needs generated by the proposed residential development.
UFD-P10 - CYCLEWAY, WALKWAY AND BRIDLEWAY NETWORK Council will ensure the continued development and maintenance of a public cycleway, walkway and bridleway network as part of the wider open space network in co-operation with relevant stakeholders, linking residential areas with open space, schools, commercial and community facilities, public transport nodes and important natural areas.	The Proposal is consistent with UFD-P10. It provides a comprehensive pedestrian and cycle network linking residential areas with the proposed open spaces, retail and commercial activities, community facilities and public transport. Shared paths, separated cycle facilities and recreational trails are integrated throughout the development, including along the Link Road, the Iver Trask Place connection and through the wetland and Wharemaukū Stream open space network. These connections also integrate with the wider active-mode network and provide for future connections beyond the Site.
UFD-P11 AMENITY VALUES 1. New subdivision, land use and development within reserves and areas identified in the District Plan as having significant scenic, ecological, cultural, scientific and national importance will provide for the amenity values of these areas, including (but not limited to) values associated with: a) a sense of openness and visual relief from more intensive urban areas; b) indigenous vegetation (excluding planted vegetation); c) significant landforms; and d) natural character. 2. New subdivision, use and development of land outside of the areas identified in (1.) above will be undertaken in a manner that considers effects on the amenity values of those areas while recognising that the District's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations.	The *Landscape and Visual Impact Assessment* states the following with respect to this objective: *The existing open and undeveloped character of the site will change; however, the change is anticipated by the Metropolitan Centre zoning and Structure Plan. The design provides amenity through the the proposed western landform, retention and naturalisation of the Wharemaukū Stream, enhancement of the wetland areas, and a connected network of open spaces, reserves and extensive landscape planting., While the eastern dune will be removed, the proposal will enhance the existing landscape features and introduce native planting, green spaces and natural character within the future urban environment. Overall, the amenity values will evolve with the anticipated development of the site.* The proposal is considered consistent with UFD-P11. While the existing open and undeveloped character of the Site will change, this is anticipated by the Metropolitan Centre zoning and Structure Plan, which provide for substantial urban development. As identified in the *Landscape and Visual Impact Assessment*, amenity is maintained and enhanced through the proposed western landform, naturalisation of the Wharemaukū Stream, wetland enhancement, extensive native planting and a connected network of open spaces and reserves. While the eastern dune will be removed, these measures will retain and enhance natural character and landscape values within the future urban environment.
FLOOD HAZARDS	
NH-FLOOD-P10 - FLOOD AND EROSION FREE BUILDING AREAS All new allotments must have flood and erosion-free building (excluding minor buildings) areas based on 1% AEP flood modelling.	The *Flood Risk Assessment* confirms that the proposed residential and commercial development areas will generally be located outside the modelled 1% AEP flood extent, with an H1 flood hazard classification achieved across the proposed development areas. The Proposal incorporates earthworks, reconfigured drainage networks and consolidated flood storage to establish suitable building areas. Finished floor levels included in the KCDC Draft Conditions incorporate appropriate freeboard above the modelled 1% AEP flood levels, with final levels and flood management arrangements confirmed through detailed design and the proposed conditions. The Proposal is therefore considered consistent with NH-FLOOD-P10.
NH-FLOOD-P11 - FLOOD RISK LEVELS A higher level of control on subdivision, use and development will be applied within river corridors, stream corridors, overflow paths and residual overflow path areas. A generally lesser level of restriction on subdivision, use and development will be applied in ponding, residual ponding, shallow surface flow, flood storage and fill control areas.	The Site is subject to several flood hazard overlays, including stream corridors, overflow paths, ponding and flood storage areas. The Proposal has been designed to respond to these existing hazards through substantial earthworks, reconfigured drainage networks and consolidated flood storage within the proposed wetland and flood management areas adjoining the Wharemaukū Stream. The *Flood Risk Assessment* demonstrates that the proposed development will generally maintain or reduce flood levels on surrounding land, with higher flood hazards concentrated within the proposed wetland and drainage corridors rather than residential and commercial development areas.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	The proposed KCDC Consent Conditions require further modelling at the Engineering Approval stage to confirm the final design and its effects on surrounding land. The Proposal is therefore considered consistent with NH-FLOOD-P11.
NH-FLOOD-P12 HIGH HAZARD FLOOD AREAS Development in the river corridor, stream corridor, overflow path, and residual overflow path areas will be avoided unless the 1% AEP hazard can be mitigated on-site to avoid damage to property or harm to people, and the following criteria are met: 1. no increase in flood flow or level on adjoining sites or other parts of the floodplain; 2. no reduction in storage capacity on-site; and 3. all flow corridors or overflow paths are kept clear to allow flood waters to flow freely at all times.	The Proposal involves development within identified stream corridors and overflow paths. These hazards will be managed through substantial earthworks, reconfigured drainage networks and the provision of consolidated flood storage within the proposed wetland and flood management areas adjoining the Wharemaukū Stream. The *Flood Risk Assessment* demonstrates that the Proposal will provide approximately 26,000m³ of additional flood storage during the 100-year ARI event, with flood levels and flows generally maintained or reduced on surrounding land. The proposed swales, culverts and drainage corridors will maintain flood conveyance through the Site, while higher flood hazards will be concentrated away from the proposed residential and commercial development areas. The proposed KCDC consent conditions require updated modelling at the Engineering Approval stage to confirm that the final design maintains flood storage and conveyance as set out in the current modelling. Subject to these requirements, the Proposal is considered generally consistent with NH-FLOOD-P12.
NH-FLOOD-P13 - PONDING, RESIDUAL PONDING, SHALLOW SURFACE FLOW, FLOOD STORAGE AND FILL CONTROL AREAS When assessing applications for subdivision, use or development within a ponding, residual ponding, shallow surface flow, flood storage or fill control area, consider the following: 1. the effects of the development on existing flood mitigation structures; 2. the effects of the development on the flood hazard – in particular flood levels and flow; 3. whether the development redirects floodwater onto adjoining sites or other parts of the floodplain; 4. whether access to the subject site will adversely affect the flood hazard; 5. the extent to which buildings (excluding minor buildings) can be located on areas of the site not subject to flooding; and 6. whether any subdivision or development will or may result in damage to property or harm to people.	The Proposal involves development within identified ponding and flood storage areas. The proposed earthworks, drainage infrastructure and consolidated flood storage areas have been designed to manage existing flood hazards while accommodating the proposed development. The *Flood Risk Assessment* demonstrates that the Proposal will provide approximately 26,000m³ of flood storage during the 1% AEP event, with flood levels and flows generally maintained or reduced on surrounding land. Floodwaters will be directed towards the proposed wetland, swales and flood management areas, rather than adjoining properties or proposed development areas. The proposed road network and associated culverts and drainage infrastructure have been incorporated into the hydraulic modelling to assess their effects on flood conveyance. The residential and commercial development areas will generally achieve an H1 flood hazard classification, with appropriate building levels and freeboard to manage risks to people and property. The proposed *KCDC Consent Conditions* require updated modelling at the Engineering Approval stage to confirm the final design and address any localised changes in flood levels, including around the Coastlands Aquatic Centre pond. Subject to these requirements, the Proposal is considered generally consistent with NH-FLOOD-P13
TRANSPORT	
TR-P1 - INTEGRATED TRANSPORT AND URBAN FORM Development and subdivision will be integrated with and consistent with the transport network hierarchy in TR-Table 7, and undertaken in a manner and at a rate to ensure: 1. the transport network is capable of serving the projected demand safely and efficiently; 2. the location of development is appropriate, including providing for the co-location of compatible developments and land use and transport networks to reduce unnecessary travel; 3. travel time and distance to services are minimised for all modes of travel; 4. development is consistent with Council's Land Development Minimum Requirements; and 5. enhanced community connectivity is achieved, resulting in more efficient travel patterns from the community.	The *Integrated Transport Assessment* states the following with respect to this policy: *The proposed new transport infrastructure comprising the town centre Link Road and other roading links have been developed to a standard which aligns with NZS4404 and the LDMR, and which will fully accommodate the anticipated demands generated by both the Site's new future activities and background traffic. The improved access and permeability function that the new roading links will provide for all travel modes will serve to enhance connectivity to, through, and within the town centre.* The proposal is consistent with TR-P1. As confirmed in the assessment, the proposed road network has been designed in accordance with NZS4404 and the LDMR and is capable of accommodating anticipated development and background traffic demands. The mixed-use nature of the Project co-locates residential, retail, commercial and recreational activities, reducing the need for longer trips. The Link Road and associated connections will also improve access and permeability for all modes, enhancing connectivity within and through the Paraparaumu town centre.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
TR-P2 - SUSTAINABLE TRANSPORT AND MAXIMISING MODE CHOICE Development and subdivision will be integrated with a transport system that offers a wide range of travel mode choices, which connects residents to essential community services, centres and social infrastructure, through: 1. well-integrated and connected communities; 2. development that is conducive to active modes of travel, particularly walkable communities which reduce demand for vehicular travel, particularly by private vehicle; 3. land use that is integrated with the transport network; 4. improved public transport services to the District; 5. travel plans and transport assessments for major traffic activities as part of an application for consent for new developments; 6. consistency with the Council's Land Development Minimum Requirements; and 7. development that ensures adequate access and space for all modes, including pedestrians, people with mobility problems, cyclists, public transport and private car travel.	The *Integrated Transport Assessment* states the following with respect to this policy: *Again, the proposed new roading infrastructure aligns with the LDMR and supports active mode access and travel through the provision of dedicated walking and cycling infrastructure, which in turn connects with the existing wider active mode network to deliver efficient links to a range of civic and retail amenities, as well as key public transport nodes.* The Proposal is consistent with TR-P2. As confirmed in the assessment, the proposed transport network provides dedicated walking and cycling infrastructure which connects with the wider active mode network, town centre amenities and key public transport nodes. The mixed-use layout integrates land use and transport and supports convenient walking and cycling between residential, commercial, retail and recreational activities. The network also provides for vehicle access and has been designed to accommodate potential future bus services, providing for a range of travel choices across the Site.
TR-P3 - AN EFFICIENT AND ECONOMIC TRANSPORT NETWORK The development, operation, maintenance and upgrading of the transport network will increase the economic vitality of the District by: 1. promoting reliable access to basic social, civic and day to day services (such as health services, schools and local shopping facilities) consistent with the transport network hierarchy maps, District Plan Maps; 2. promoting timely and reliable access of freight and goods for processing and markets, without compromising the amenity of living and other sensitive activities; and 3. promoting reliable access of workers to employment, with a priority placed on local employment access but a recognition of links with regional employment.	The *Integrated Transport Assessment* states the following with respect to this policy: *The new town centre Link Road (and provision for future Iver Trask Place extension) will serve to improve reliability of access to the town centre and its existing / future amenities for shopping, recreational and commuting trips, as well as supporting associated servicing and deliveries for town centre development.* The Proposal is consistent with TR-P3. As confirmed in the assessment, the Link Road and provision for the future Iver Trask Place extension will improve access to and through the town centre for shopping, recreation and commuting, while also supporting servicing and deliveries. The Project will also establish substantial new retail, commercial and employment activity within the Metropolitan Centre, improving access to local services and employment opportunities.
TR-P4 - EFFECTS OF TRANSPORT ON LAND USE/DEVELOPMENT The potential adverse effects of development, operation, maintenance and upgrading of the transport network on land use and development will be avoided, remedied or mitigated by: 1. ensuring that new habitable buildings and future noise sensitive activities within close proximity to roads identified as a transportation noise effect route and the rail corridor as identified on the District Plan Maps are protected from the adverse effects of road traffic and rail noise; 2. avoiding the significant adverse effects of earthworks associated with the transport network; 3. ensuring that development of the transport network will: a) minimise degradation of amenity values; b) avoid unacceptable levels of noise and vibration, including from strategic arterial routes; c) minimise disruption or destruction of plant and wildlife habitats; d) seek to avoid adverse effects on historic heritage, and where avoidance is not practicable, any adverse effects are remedied or mitigated; e) minimise community severance and other social effects;	The *Integrated Transport Assessment* states the following with respect to this policy: *The District Plan includes specific noise and acoustic insulation standards applying to development within the Metropolitan Centre Zone, including additional requirements for noise-sensitive activities located within 80 m of the State Highway. An acoustic assessment letter provided with the application confirms that the proposed development can be designed to comply with these requirements, with the necessary acoustic treatment and ventilation measures able to be incorporated at the detailed building design and building consent stage. Compliance with the relevant District Plan standards will therefore ensure that State Highway noise effects on future noise-sensitive activities within the Site are appropriately managed.* *The potential impacts of community severance within the Site, particularly in relation to the Town Centre Link Road, have been addressed through the provision of frequent crossing opportunities supporting connectivity across the development. The proposed active mode network will also provide safe and convenient walking and cycling connections throughout the Site.* The Proposal is consistent with TR-P4. As confirmed in the ITA, potential transport noise effects on future noise-sensitive activities can be appropriately managed through compliance with the relevant District Plan acoustic standards and detailed building design. The transport network has also been designed to minimise severance and effects on pedestrian and cyclist safety through frequent crossing opportunities and a connected active mode network. Other effects associated with the construction and operation of the transport network, including earthworks, ecological, stormwater and heritage effects, are

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
f) minimise loss of productive land and loss of private property; g) minimise pollution of water resources (e.g., stormwater quality and quantity, increased siltation of waterbodies due to road construction, disruption of waterbodies through the use of culverts and piping which can affect fish migration); h) avoid unacceptable levels of emissions to air; and i) minimise adverse effects on pedestrian and cyclist safety and amenity including availability and safety of walkways, footpaths, cycle lanes, tracks, level and impacts of weather protection (including shade).	addressed through the corresponding technical assessments and proposed mitigation measures.
TR-P5 - EFFECTS OF LAND USE ON TRANSPORT The potential adverse effects on the transport network from development and subdivision will be avoided, remedied or mitigated by identifying both the key existing transport routes and proposed transport routes likely to be required long term as part of the District's transport network and having regard to these when considering applications for subdivision or development.	The *Integrated Transport Assessment* states the following with respect to this policy: *The proposed new roading links have been designed to align with the transport movement network identified in the MCZ Structure Plan, noting these have long been planned to supplement the existing roading network that gives provides access to the town centre.* The Proposal is consistent with TR-P5. As confirmed in the assessment, the proposed road network responds to the long-term transport connections identified in the MCZ Structure Plan, including the Town Centre Link Road and provision for the future Iver Trask Place connection. The ITA confirms that the network can accommodate the anticipated traffic demands associated with the Project, while improving access and connectivity within and through the town centre.
TR-P6 - SAFETY The safety of all transport users will be enhanced during the development, operation, maintenance and upgrading of the transport network, by: 1. implementing the principles set out in Appendix 6 - Crime Prevention Through Environmental Design (CPTED) Guidelines; 2. requiring that all developments provide for safe vehicular and pedestrian access, and have adequate visibility (sight lines); 3. requiring all developments to have safe connections to the wider transport network; and 4. requiring adequate visibility and sight lines for level crossings.	The *Integrated Transport Assessment* states the following with respect to this policy: *The proposed new roading links have been carefully designed to ensure they deliver safe and efficient movement for all modes, including in respect of CPTED and appropriate visibility sight lines.* The Proposal is consistent with TR-P6. As confirmed in the assessment, the proposed transport network has been designed to provide safe and efficient movement for all modes, including appropriate visibility and sight lines and consideration of CPTED principles. Safe pedestrian and cycling facilities, crossing opportunities and connections to the wider transport network are incorporated throughout the development
TR-P7 - CYCLING, WALKING AND BRIDLEWAY LINKS AND SAFETY Subdivision, use and development will be as far as practicable, located and designed to make walking, cycling and the use of bridleways safer, more enjoyable and convenient in accordance with the Crime Prevention Through Environmental Design (CPTED) Guidelines set out in Appendix 6 and the following principles: 1. new street linkages will provide safe pedestrian access to shops and services and public transport nodes; 2. subdivision and development will: a) enable cycle and pedestrian routes, both on and off road, which offer good continuity; b) avoid large blocks that severe connectivity; and c) consider opportunities to provide bridleways in suitable locations; and 3. development will provide for convenient cycle parking facilities in centres; and 4. pedestrian and cycle routes will have well designed and built facilities including surface conditions, lighting, signage and passive surveillance from adjacent development.	The *Integrated Transport Assessment* states the following with respect to this policy: *….the proposed new roading infrastructure has been developed to provide a high-level of amenity for active mode users, with dedicated walking and cycling infrastructure that will support and encourage these modes over private car travel for convenient short trips, including a shared path along Iver Trask Place that will link to the current town centre (ahead of any vehicular connection) to support connectivity.* The Proposal is consistent with TR-P7 as tje proposed transport network provides dedicated and connected walking and cycling infrastructure throughout the Site, including links to the existing town centre and public transport. The layout supports good route continuity and permeability, with development providing passive surveillance of pedestrian and cycle routes. Cycle parking is also provided within the Parks and Playgrounds Plans, with suitable space available within individual residential lots and developments. Overall, the Project provides a safe, convenient, and well-connected environment for walking and cycling.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
TR-PARK-P8A - CYCLE PARKING All new subdivision and development shall provide for safe, sufficient, and appropriately located on-site cycle parking facilities.	The Proposal is consistent with this policy as cycle parking across the development. The Parks and Playgrounds Plans identify cycle parking facilities within the principal public open space and recreation areas, while the proposed residential lots and developments provide sufficient space for secure cycle storage to be accommodated within individual properties.
INFRASTRUCTURE	
INF-GEN-P1 - RECOGNITION The national, regional or local importance and benefits of sustainable, secure and efficient provision of the following infrastructure will be recognised: 1. facilities for the generation of electricity; 2. activities, buildings, structures, lines and masts associated with the operation, maintenance and upgrade of the national grid, local electricity distribution and transmission networks, and connections between local community suppliers and the electricity distribution and transmission networks; 3. pipelines and gas facilities used for the transmission and distribution of natural and manufactured gas or petroleum; 4. road and rail networks as mapped in the Regional Land Transport Strategy or Regional Land Transport Plan and Council's transport network hierarchy; 5. telecommunication and radio communication facilities; and 6. public or community infrastructure associated with water supply, sanitation and waste facilities, the stormwater network and drainage, provided these services are developed within a water conservation framework and minimise environmental impacts.	The Proposal is consistent with this policy for the following reasons: • The Proposal provides for the extension of the local transport network to support the planned growth and intensification of the Metropolitan Centre; • The proposed Link Road will provide an important strategic connection through the area, improving connectivity between the existing transport network and providing for the longer-term integration of the site with the wider transport network; • The proposed extensions to Ihakara Street, Iver Trask Place and Brett Ambler Way are anticipated by the Metropolitan Centre Zone Structure Plan and will contribute to the establishment of the planned, connected transport network for the wider centre; • The development includes new and upgraded water supply, wastewater and stormwater infrastructure necessary to efficiently service the development; and • Stormwater infrastructure has been integrated with the wider stormwater, flood management and ecological design for the site to minimise environmental effects while providing for the efficient servicing of the development.
INF-GEN-P3 - PROTECTING THE MAURI OF NATURAL SYSTEMS Natural systems are recognised as taonga and will be protected from any adverse environmental effects arising from the establishment, operation, maintenance and upgrading of infrastructure that affect the mauri of these systems in accordance with local tikanga.	The *Interim Cultural Impact Assessment* identifies the importance of natural systems as taonga and the interconnected relationship between whenua, wai and ecological systems. The proposal has sought to respond to these values through the integrated design of infrastructure, stormwater and ecological systems, including restoration and enhancement of the Wharemaukū Stream corridor, creation of indigenous wetland habitat and stormwater treatment. The proposed conditions provide for ongoing partnership with Ātiawa ki Whakarongotai in the detailed design, implementation and monitoring of the ecological works. This will provide an important mechanism for local tikanga and mātauranga Māori to inform these works and the protection and enhancement of mauri. The concerns identified in the CIA, including in relation to effects on natural systems, will continue to be addressed through ongoing engagement and refinement of conditions.
INF-GEN-P4 - MANAGING ADVERSE EFFECTS Any adverse environmental effects arising from the establishment, operation, maintenance and upgrading of infrastructure will be avoided, remedied or mitigated as far as reasonably practicable by: 1. ensuring significant adverse effects are avoided, remedied or mitigated through route, subject site and method selection; 2. minimising the effects of infrastructure on the amenity values of the surrounding area and areas of outstanding or high natural character, in particular visual effects with respect to scale, and the sensitivity of the environment in which they are located; 3. considering all water bodies to be valued assets and protecting the mauri of fresh and coastal water resources; 4. where appropriate, ensuring opportunities to enhance indigenous biodiversity as part of infrastructure design are identified and implemented;	The Proposal is consistent with this policy for the following reasons: • Infrastructure has been integrated into the overall site design to avoid or minimise adverse environmental effects as far as reasonably practicable; • Infrastructure will predominantly be located within road corridors and has been designed to minimise effects on the amenity values of the surrounding area; • Consideration has been given to the relationship of infrastructure with the Wharemaukū Stream, wetland offset area and wider stormwater system, including through the proposed stormwater management and flood storage measures; • The proposal incorporates ecological enhancement, including naturalisation and planting of the Wharemaukū Stream corridor and establishment and enhancement of wetland habitat; • Monitoring, maintenance and adaptive management measures are proposed where appropriate to ensure the ongoing performance of infrastructure and associated environmental measures; and • Where residual ecological effects cannot be avoided or otherwise mitigated, appropriate offsetting and compensation measures are proposed.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
5. requiring adaptive management measures (including monitoring and remediation) where uncertainty may exist around impacts over time; 6. considering the use of offsetting measures or environmental compensation (including measures or compensation which benefit the local environment and community affected) where a 'residual effect' cannot be avoided, remedied or mitigated; and **7.** ensuring the above considerations are provided to accomplish best practice at the time of application and construction.	
INF-GEN-P5 - INFRASTRUCTURE IN ROAD CORRIDORS The use of roads as infrastructure corridors will be encouraged.	The Proposal makes use of proposed road corridors for the provision of infrastructure servicing the development, including three waters and utility infrastructure.
INF-GEN-P7 - INFRASTRUCTURE AND GROWTH MANAGEMENT Subdivision, use and development of land for urban growth and intensification will be focused on certain areas (i.e. in existing urban areas). Subdivision, use and development will be avoided in areas where it: 1. is unable to be efficiently integrated with existing infrastructure, or be serviced by new infrastructure in an efficient and cost-effective manner; 2. does not promote the efficient end use of energy, including energy use associated with private vehicular transport, and efficient use of water; 3. does not align with Council's infrastructure asset management planning; 4. would lead to inefficient or unduly high operation and maintenance costs for public infrastructure; 5. is unable to make the most efficient use of the transport network; and **6.** would lead to further growth pressures and demand for infrastructure investment ahead of the community's or infrastructure provider's ability to fund, or its desired funding programme.	The Proposal represents significant urban growth within an existing urban area and is expressly anticipated in the MCZ. The development will integrate with and extend existing three waters, transport and utility infrastructure, with new infrastructure provided as necessary to service the development. The proposal also makes efficient use of the existing transport network and its highly accessible location adjoining the existing Paraparaumu Metropolitan Centre. Overall, the proposal represents a coordinated and efficient approach to infrastructure provision that supports planned urban growth.
INF-GEN-P8 - DEVELOPMENT STAGING Where subdivision or development is proposed that requires additional or earlier community investment in infrastructure than is set out in the Council's Long Term Plan, Infrastructure Strategy and Annual Plan, the Council will either: 1. require the staging of the proposal to fit with existing capacity through any consent application process; or 2. provide the opportunity for the 'forward' provision of an agreed proportion of the infrastructure upgrade works by a developer, provided that: a) those works do not trigger additional community and network utility operator investment demands; and b) those works are consistent with the Council's Asset Management Plan; or **3.** for additional unplanned works that are not set out in the Council's Long Term Plan and Infrastructure Strategy, require the payment of a financial contribution in accordance with the Financial Contributions chapter of this Plan.	The Proposal will be implemented in stages, allowing construction and infrastructure delivery to be coordinated with development demand. The servicing assessments identify the infrastructure required to support the development, including upgrades to the existing wastewater, water supply, electricity and transport networks. Some of these works remain subject to detailed design, confirmation of network capacity and delivery arrangements. The proposed staging arrangements and consent conditions will ensure that the infrastructure required to service each stage is provided before that stage is occupied or brought into use.
INF-GEN-P11 QUALITY OF INFRASTRUCTURE DESIGN AND SERVICES Development and subdivision, and the provision of associated Infrastructure will be undertaken in accordance with the Council's Land Development Minimum Requirements.	The Proposal is consistent with INF-GEN-P1 as the proposed infrastructure will be designed and constructed in accordance with the relevant requirements of the Council's Land Development Minimum Requirements (LDMR). The *KCDC Draft Conditions* include Council's standard infrastructure conditions, which reference the relevant sections of the LDMR and require detailed engineering

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	plans to be submitted to Council for approval prior to construction. This will ensure that the detailed design and construction of infrastructure servicing the development complies with the applicable LDMR requirements.
INF-PNU-P13 - DEVELOPMENT, USE, MAINTENANCE, REPLACEMENT AND UPGRADING The development, use, maintenance, replacement and upgrading of network utilities will be enabled while ensuring that adverse environmental effects are minimised. When considering measures to avoid, remedy or mitigate adverse environmental effects from the development, use, maintenance, replacement and upgrading of network utilities, decision-makers must consider the constraints on achieving those measures imposed by the technical and operational requirements of the network.	The Proposal includes new network utilities necessary to service the development. These utilities have been integrated into the overall development design, with adverse environmental effects associated with their construction and operation appropriately avoided or minimised through their location, design and proposed conditions of consent.
INF-PNU-P14 - PLACE NETWORK UTILITIES UNDERGROUND Unless otherwise technically or operationally, impracticable, new network utility infrastructure will be placed underground. Where undergrounding is technically or operationally impracticable, any new aboveground network utility infrastructure will be well designed and resilient to identified natural hazards.	New network utility infrastructure required to service the development will generally be located underground. Where any infrastructure is required above ground for technical or operational reasons, it will be appropriately designed and located to minimise adverse effects and provide for resilience.
SUBDIVISION IN WORKING ZONES	
DO-19 HOUSING BOTTOM LINES To achieve sufficient development capacity as required by the National Policy Statement on Urban Development 2020 by meeting housing bottom lines of: 1. 6,123 additional residential units over the short-medium term (2021 – 2031); and 2. 10,063 additional residential units over the long term (2031-2051).	The Proposal will make a significant contribution to housing development capacity within the District through the provision of approximately 604 additional residential units within the Paraparaumu Metropolitan Centre.
EARTHWORKS	
EW-P1 EARTHWORKS Earthworks activities excluding extractive industries, the removal and replacement of underground storage tanks, and earthworks defined in and regulated by the NESPF will: 1. be managed to protect geological features identified in Schedule 6 from disturbance; and 2. be sympathetically located and of a scale that protects the values of outstanding natural features and landscapes identified in Schedule 4; and 3. avoid or mitigate erosion and off-site silt and sediment runoff to the Council's reticulated stormwater system and waterbodies; and 4. be managed to ensure adverse effects on natural landforms, residential amenity values and rural character values are remedied or mitigated.	The Proposal is consistent with this policy. The project retains identified landscape features and the application is accompanied by *Infrastructure Report* that outlines the following principles that will be further developed to manage potential effects associated with earthworks: • Minimise the extent of earthworks as much as is practicable. • Minimise the amount of area open at one time and the time that these areas are left un-stabilised. • Apply additional protection (e.g. silt fences) and work methodologies around sensitive receiving environments (near stream corridors etc). • Progressive stabilisation of disturbed areas as soon as practicable. • Installation of perimeter controls for the diversion of clean water around the earthworks extent and separate this from sediment-laden water within the site. • Install treatment devices to maximise the efficiency of sediment removal within treatment devices. • Review and revise the effectiveness of erosion and sediment controls on a regular basis to ensure that they are still effective and applicable to the current site conditions. The *Landscape and Visual Impact Assessment* also states the following with respect to this policy: *The proposal involves earthworks, associated with the modification of the dune landforms and preparation of the site for urban development. The eastern dune will be removed, while the more prominent western dune will be modified with a new identifiable landform providing a buffer between the site and the Kapiti Expressway. Adverse landscape and amenity effects associated with the earthworks will be mitigated through a well-considered landform design and*

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	native planting, which will assist in integrating the reshaped dune into the future urban environment. The site is not identified as an Outstanding Natural Feature or Landscape, and erosion and sediment effects associated with the earthworks will be addressed through the relevant engineering and construction controls.
NOISE	
NOISE-P1 - MANAGING AMENITY Noise resulting from land use and development (including fixed plant) will be managed or minimised to achieve an appropriate level of amenity in each zone while acknowledging the primary activities and character in each zone.	The proposed residential, retail and commercial activities are expressly anticipated within the MCZ. The District Plan establishes noise standards that reflect the level of amenity appropriate within the Zone, while recognising its intended activities and character. The proposal will be required to comply with the applicable permitted activity noise standards, including those relating to general operational noise, fixed plant and the acoustic treatment of noise-sensitive activities. Compliance with these standards is proposed to be addressed through consent conditions. Accordingly, noise generated by the proposal will be appropriately managed and the proposal is consistent with NOISE-P1.
NOISE-P4 - NOISE FROM THE TRANSPORT NETWORK All noise sensitive activities in close proximity to a transportation noise effect route or the designated rail corridor must be protected by the building owner from adverse effects of noise through the adoption of acoustic mitigation measures.	The Proposal includes noise sensitive activities in proximity to Kapiti Expressway. As outlined above, the proposed dwellings will be designed and constructed to comply with the applicable acoustic insulation and ventilation requirements of NOISE-R14, with compliance secured through conditions of consent. These measures will ensure that future occupants are appropriately protected from transport noise. Accordingly, the proposal is consistent with NOISE-P4.
COASTAL ENVIRONMENT	
CE-P1 - Coastal Environment Characteristics Recognise the extent and characteristics of the coastal environment including: 1. areas or landforms dominated by coastal vegetation or habitat of indigenous coastal species; 2. landform affected by active coastal processes, excluding tsunami; 3. elements or features, including coastal escarpments, that contribute to the natural character, landscape, visual quality or amenity value of the coast; and **4.** Sites, structures, places or areas of historic heritage value adjacent to, or connected with, the coast, which derive their heritage value from a coastal location.	The *Landscape and Visual Impact Assessment* states the following with respect to this policy: *The site is located within the Coastal Environment, although it is physically separated from the coastline by residential urban development and the Kapiti Expressway. Existing vegetation within the site is predominantly exotic grass and scrub, including gorse and blackberry, with limited native vegetation. The main features that inform the site's coastal character are the western and eastern dune landforms, Wharemauku Stream and associated wetlands.* *The proposal will remove the eastern dune and modify the western dune, with a realigned landform extending from the former southern extent of the dune along the Kāpiti Expressway boundary. The proposed western landform will incorporate native planting as part of the wider landscape response. The Wharemaukū Stream will be retained in its existing alignment and naturalised and enhanced through native riparian planting and greater variation in channel depth and substrate, alongside enhancement of the associated wetland network.* *Overall, while the proposal will modify the existing dune landforms, the effects of this change are addressed through the proposed landform design and landscape treatment, together with enhancement of the Wharemaukū Stream corridor, wetland system and wider blue-green network.* The Proposal is consistent with CE-P1. As identified in the *Landscape and Visual Impact Assessment*, the coastal characteristics of the Site have informed the design response, particularly the treatment of the dune landforms, Wharemaukū Stream and associated wetlands. While the existing dune landforms will be modified, the proposed landscape treatment, together with the naturalisation and enhancement of the stream, wetlands and wider blue-green network, appropriately recognises and responds to the Site's coastal environment characteristics.
CE-P3 – Preservation of Natural Character Preserve natural character in the coastal environment, and protect it from inappropriate subdivision, use and development, including by: 1. avoiding adverse effects of activities on natural character in areas of outstanding natural character; 2. avoiding significant adverse effects, and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment;	The *Landscape and Visual Impact Assessment* states the following with respect to this policy: *As mentioned previously, the proposal will modify the dune landforms, waterways and wetlands. The smaller eastern dune will be removed, however, its landscape impact on the receiving environment is relatively localised. The more prominent and visible western dune will substantially modified, with a realigned landform extending from the former southern extent of the dune along the Kāpiti Expressway boundary. reinforce its natural character and maintain its presence as a landscape buffer adjacent to the Kapiti Expressway.*

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
3. reinstating dunes which function as natural buffers where practicable; 4. providing managed public access ways to the beach and foreshore and limiting damage to dunes from unmanaged access; 5. regulating encroachment of permanent structures and private uses onto the beach or public land; 6. removing existing unnecessary structures and associated waste materials from the beach; and **7.** retaining a natural beach and foreshore including a dry sand beach where practicable.	*Wharemauku Stream and the wetland network will also be modified and enhanced through restoration and planting. Overall, while some existing natural character will be lost or altered, the proposal will retain and enhance some key features and provide mitigation where possible.* The Proposal is consistent with CE-P3. The Site does not contain outstanding natural character, and the *Landscape and Visual Impact Assessment* expressly recognises the adverse effects arising from the loss and modification of the existing dune landforms. These effects are addressed through the design and planting of the new western landform and the wider landscape response, including enhancement of the Wharemaukū Stream corridor, wetland system and blue-green network. Overall, the Project appropriately avoids, remedies or mitigates adverse effects on natural character within this modified coastal environment.
CE-P4 – Restore Natural Character Promote restoration of the natural character of the coastal environment where practicable, by: 1. creating or enhancing indigenous habitats and ecosystems, using local genetic stock; 2. encouraging natural regeneration of indigenous species, while effectively managing weed and animal pests; 3. rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarshes; 4. restoring and protecting riparian and intertidal margins; 5. removing redundant coastal structures and materials that do not have heritage or amenity values; or **6.** redesign of structures that interfere with ecosystem processes.	The *Landscape and Visual Impact Assessment* states the following with respect to this policy: *The proposal includes a number of measures that will assist in restoring the natural values and character within the site. While the existing western dune will be modified, the proposed realigned landform along the Kāpiti Expressway boundary will incorporate native planting as part of the wider landscape response.* *The Wharemaukū Stream will be retained in its existing alignment and naturalised and enhanced through native riparian planting and greater variation in channel depth and substrate. The associated riparian margins and wetland areas will also be enhanced through restoration and native planting. . These measures will help improve biodiversity and increase native vegetation, contributing to a more consistent greenspace network through the development.* The Proposal is considered consistent with CE-P4. While the existing dunes will be modified, the development incorporates a range of measures to restore and enhance natural character across the Site. In particular, the Wharemaukū Stream will be retained in its existing alignment and naturalised through native riparian planting and improvements to channel depth and substrate. Riparian areas will also be restored and enhanced through native planting, while the proposed western landform will incorporate indigenous vegetation as part of the wider landscape response. Overall, these measures will increase native vegetation, enhance aquatic and terrestrial habitat and strengthen the connected green network across the Site, providing meaningful restoration of natural character alongside the planned urban development.
CE-P5 – Amenity and Public Access Maintain and enhance amenity values in the coastal environment, such as open space and scenic values, and provide opportunities for recreation and the enjoyment of the coast, including the enjoyment of a high tide dry beach by the public. Public access to and along the coast will be maintained and enhanced while minimising any significant adverse effects on the public's use and enjoyment of the coast.	The *Landscape and Visual Impact Assessment* states the following with respect to this policy: *The proposal will enhance public access and recreational opportunities with a connected network of open spaces, walkways and cycle connections along Wharemauku Stream, wetlands and other landscape areas. The proposed planting, reserves and greenspaces network will also increase visual amenity and provide areas of open space within the future urban environment. While the site is physically separated from the coastline by the Kapiti Expressway and residential urban development, the proposal will improve public access within this part of the wider coastal environment.* The Proposal is consistent with CE-P5. As identified in the *Landscape and Visual Impact Assessment*, the Project incorporates restoration and enhancement measures, including native planting of the new western landform and the naturalisation and enhancement of the Wharemaukū Stream and its riparian margins. The restoration and planting of the wetland and wider blue-green network will further increase indigenous vegetation and habitat values across the Site, contributing positively to the natural character of the coastal environment.

TABLE 2: DISTRICT PLAN OBJECTIVES AND POLICIES	
PROVISION	COMMENT
CE-P7 - Natural Dunes Natural dune systems will be protected and enhanced (including through restoration) and natural dune function will be enabled where practicable.	The *Landscape and Visual Impact Assessment* states the following with respect to this policy: *The proposal will remove the smaller eastern dune and regrade the western dune into a realigned, planted landform following the Kāpiti Expressway boundary. Although the landform's original profile will change, the design retains a substantive topographical component within the site's future landscape character.* *Retention of both dunes in their existing footprints has been considered through the master planning process and assessed in detail in Appendix A of the Urban Design Statement prepared by Urban Acumen. Retention of the dunes would materially restrict the planned link road and internal connections, fragment development blocks and reduce opportunities for active interfaces and coordinated public open spaces within Precinct C. The proposed design addresses these spatial constraints while retaining a planted landform along the Expressway edge, rather than removing all topographical variation. In my assessment, this represents a reasonable landscape-led response to the competing outcomes identified for the Metropolitan Centre by providing effective urban connectivity and development alongside the maintenance of recognisable local landscape structure.* *The eastern dune has a relatively confined visual influence within the wider receiving environment. The new western landform will maintain a recognisable green edge adjoining the Expressway, with shaped slopes and native species suited to the site's conditions. The replacement of extensive gorse and exotic scrub with sustained indigenous planting will improve vegetation quality, seasonal interest and amenity, while the wider stream and wetland enhancements reinforce the coastal landscape character of the completed development.* The *Landscape and Visual Impact Assessment* acknowledges the loss and modification of existing dune landform values, assessing the resulting localised adverse natural character effects as Moderate, reducing to Low–Moderate overall following landscape treatment. These effects are more pronounced at the Site level than within the wider receiving environment. The assessment also identifies the contribution of the proposed western landform and wider landscape framework to the character and amenity of the developed Site. The Proposal is consistent with CE-P7 when read alongside the more specific direction in MCZ-P2 for Precinct C. While the existing dune system cannot be protected in its current form, the policy framework expressly recognises that avoidance is required to the extent practicable having regard to the development outcomes provided for in Precinct C, with mitigation or offsetting where effects cannot be avoided. As identified in the *Landscape and Visual Impact Assessment*, retaining the dunes in their current configuration would materially constrain the comprehensive development and urban structure anticipated for the Site. The proposed new western landform, native dune planting and wider environmental enhancements provide an appropriate response to the unavoidable modification and loss of the existing dunes. As identified in the *Landscape and Visual Impact Assessment*, the existing dune system is already modified and fragmented, including through severance of the western dune by the Kapiti Expressway and adjoining drain. The *Interim Cultural Impact Assessment* identifies the significance of the dune system to Ātiawa ki Whakarongotai and the values and relationships associated with these landforms. Ātiawa opposes the removal of the dunes and does not consider that their loss can be adequately mitigated or offset. This position is acknowledged and will remain a matter for ongoing engagement with Ātiawa. Notwithstanding this unresolved matter, from a landscape, natural character and planning perspective, the proposed response is considered consistent with CE-P7 when the policy framework is read as a whole.

3. NATURAL RESOURCES PLAN RULES AND STANDARDS

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT

RMA SECTION	RULE / ACTIVITY	RULE DETAIL AND COMMENT	
		LAND DISTURBANCE	
9 AND 15	**R101 (Permitted)** **R107 (Discretionary)**	Under Rule R99 of the NRP, the use of land, and the associated discharge of sediment-laden runoff stormwater into water, or onto or into land where it may enter water, from earthworks of up to a total contiguous area up to of 3,000m^2 per property per 12-month period is a Permitted Activity, provided that conditions are met. **Comment:** The Proposal will exceed 3,000m^2 in area per 12-month period. Therefore, the earthworks and associated discharges of sediment laden stormwater to land where it may enter water requires consent for a Discretionary Activity under Rule R101. For completeness and while not applicable, the project engineer has confirmed that the proposed earthworks will comply with the conditions of Rule R99. Therefore, **Discretionary Activity** consent is required under Rule R101.	
		VEGETATION CLEARANCE	
9	**R104 (Permitted)** **R107 (Discretionary)**	Vegetation clearance rules in the NRP apply to erosion prone land (being land with a pre-existing slope that exceeds 20 degrees). Under Rule R100, vegetation clearance on erosion prone land is a Permitted Activity provided that the conditions are met. **Comment:** As vegetation clearance will be undertaken within 5m of a stream, the proposal does not comply with clause (c) of Rule R100 of the NRP and Discretionary Activity resource consent is required under Rule R101. All other conditions of R100 will be complied with. The Applicant and its consultants will confirm in the resource consent application that the site works will be undertaken to ensure compliance with the relevant 'uses of beds of lakes and rivers general conditions' in Section 5.5.4 of the NRP. Therefore, **Discretionary Activity** consent is required under R101.	
		DISCHARGE OF STORMWATER (OPERATIONAL)	
9	**R49 (Permitted)** **R50 (Restricted Discretionary)**	The proposal includes the discharge of stormwater to a new piped network that will discharge to the existing reticulated network. Under Rule R48A of the NRP, the discharge of stormwater into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, from: a) a new urban subdivision or development associated with earthworks up to a total area of 3,000m^2 per property per 12-month period, or b) a new urban subdivision or development in an area where a stormwater management strategy in accordance with Schedule N (stormwater strategy) applies is a permitted activity provided the following condition is met: c) the discharge shall comply with the conditions of Rule R48 except condition R48(c). is a Permitted Activity provided that conditions are met. **Comment:** The new development includes associated earthworks that exceed 3,000m^2 and therefore the Proposal is unable to comply with the above rule. In relation to the R48 conditions, refer assessment below.	
		• The discharge does not originate from industrial or trade premises where hazardous substances are stored;	**Will not comply.** Future land uses will include trade premises.
		• The discharge is from a contaminated site;	**Will comply**
		• The discharge will not contain wastewater;	**Will comply**
		• The total concentration of total suspended solids in the discharge shall exceed: 100g/m3 where the discharge enters any other fresh or coastal water	**Will comply**
		• The discharge will not cause any erosion of the channel or banks of the receiving coastal marine area;	**Will comply**
		• The discharge will not give rise to the following effects beyond the zone of reasonable mixing:	**Will comply**
		• The production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials; or	**Will comply**
		• Any conspicuous change in the colour or visual clarity, or	**Will comply**
		• Any emission of objectionable odour, or	**Will comply**

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT			
RMA SECTION	RULE / ACTIVITY	RULE DETAIL AND COMMENT	
		• Any significant adverse effects on aquatic life.	Will comply
		Under Rule R52A of the NRP-AV, the discharge of stormwater from a new subdivision or development into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule R48A is a Restricted Discretionary Activity. The matters to which Council have restricted its discretion are as follows: *Measures to minimise the adverse effects of stormwater discharges in accordance with Policy P73, including the extent to which water sensitive urban design measures are employed;* *Measures to manage runoff volumes and peak flows in accordance with Policy P79; and,* *Requirements of any relevant local authority stormwater network discharge consent.* Therefore, **Restricted Discretionary Activity** consent is required under Rule R52A.	
		DISCHARGE OF STORMWATER TO LAND	
9	R49 (Permitted) R53 (Discretionary)	It is not clear in the Summary of Decisions documentation whether the 'stormwater to land' provisions apply in addition to the provisions related to stormwater discharge associated with new urban development. For completeness, assessment against the stormwater to land provisions is provided below. **Comment:** Under Rule R49 of the PNRP-AV, the discharge of stormwater onto or into land, including where contaminants may enter groundwater, from an individual property is a permitted activity provided that conditions are met. Condition (a) requires that the discharge is not from, onto or into SLUR Category III land contaminated land. The proposed operational stormwater discharges will comply with all of the conditions of Rule R49 except the clause relating to discharges from trade premises. Under Rule R53, the discharge of stormwater, including stormwater that may be contaminated by wastewater, into water or onto or into land where it may enter water, that is not permitted by Rules R48, R48A or R49, or controlled by Rule R50, or a restricted discretionary activity under Rules R51, R52 or R52A is a Discretionary Activity. Therefore, **Discretionary Activity** consent is required under Rule R53.	
		WETLANDS	
5.4.2 ACTIVITIES IN WETLANDS GENERAL CONDITIONS Wetland general conditions for activities in natural wetlands and outstanding natural wetlands are that:			
a)	the vegetation and the bed of the natural wetland or outstanding natural wetland shall not be disturbed to a depth or an extent greater than that required to undertake the activity, and		Will comply
b)	there shall be no discharge of contaminants (including but not limited to oil, petrol, diesel, paint, solvent, heavy metals and other toxicants) to water or the bed, except where this is the result of the disturbance of sediment and other materials already existing in the water or bed, and		Will comply
c)	no cleaning or refuelling of machinery or equipment, or storage of fuel shall take place in, or within 10m of, a natural wetland or outstanding natural wetland, or at any location where fuel can enter a water body, and		Will comply
d)	all machinery, equipment and materials used for the activity shall be removed from the natural wetland or outstanding natural wetland every night and on completion of the activity. This includes any excess material from the construction operation, any materials used during construction of any structure but not part of that structure, and any material removed or demolished from any structure, and		Will comply
e)	structures are designed, installed and maintained, and activities are carried out in a manner to ensure that fish passage is maintained at all times, unless a temporary restriction of no more than 48 hours is required for construction or maintenance activities, and		**Will not comply**. While it has been determined highly unlikely that fish passage is currently enabled in some of the wetlands to be reclaimed, fish passage will not be provided in some of the reclamation works.
f)	in any part of the natural wetland or outstanding natural wetland with inanga spawning habitat identified in Schedule F1b (inanga spawning), no bed disturbance, diversions of water or sediment discharge shall occur between 1 January and 31 May, except that material accumulated at the outlet of a stormwater discharge pipe may be removed between 1 January and 1 March, so long as there is no associated trimming or removal of vegetation (including weeds) on the bed or banks, and		**Will comply.** While the Wharemauku Stream is identified in Schedule F1, none of the on-site wetlands are listed.
g)	the diversion of water shall not be for longer than the time required to undertake the activity, and any diversion of water required to undertake the activity must be for fewer than 14		**Will not comply.** The wetland offset and restoration works will likely be longer than 14 days.

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT			
RMA SECTION	**RULE / ACTIVITY**	**RULE DETAIL AND COMMENT**	
		consecutive days, and must occur prior to the disturbance of the bed of the natural wetland or outstanding natural wetland, and	
		h) the following setback conditions apply to plantation forestry activities as covered by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017:	**Not applicable**
9	**R114 (Permitted)**	**Planting and pest plant control in natural wetlands and outstanding natural wetlands** The deliberate introduction or planting of a plant, and the removal or control of pest plants in the bed of a natural wetland, or outstanding natural wetland including any associated: (a) disturbance of a river or lake bed, or foreshore or seabed, that forms part of a natural wetland or outstanding natural wetland, and (b) deposition in, on, or under a river or lake bed, or foreshore or seabed, that forms part of a natural wetland or outstanding natural wetland, and (c) damage to part of the foreshore or seabed that forms part of a natural wetland or outstanding natural wetland, and (d) diversion of water, and (e) discharge of sediment to water is a Permitted Activity provided the following conditions are met:	
		(f) only indigenous wetland species typical of the area and wetland type are deliberately introduced or planted, and	**Will comply.** This requirement is specified in the *Ecology Assessment* and *Wetland Offset Plan.*
		(g) only plant species that are not typical of the area and wetland type are deliberately removed or controlled, and	**Will not comply** Some wetland species that are typical of the area may be removed so compliance is not likely with this standard.
		(h) only agrichemicals approved by the Environmental Protection Authority for use into and over water are used and the conditions of Rule R37 are met, and	**Will comply.** This requirement is specified in the *Ecology Assessment* and *Wetland Offset Plan*
		(i) agrichemicals are not applied by aerial spraying, and	**Will comply.** This requirement is specified in the *Ecology Assessment* and *Wetland Offset Plan*
		(j) only hand-held machinery is used in any area of the natural wetland or outstanding natural wetland, and	**Will not comply.** It is likely that the wetland offsetting works will require other earthworking machinery. So compliance with this standard is not likely.
		(k) the activity shall comply with the wetland general conditions for activities in natural wetlands and outstanding natural wetlands specified above in Section 5.4.2.	**Will not comply** Refer assessment above.
		Due to non-compliances with the standards, **Discretionary Activity** consent is required under Rule R117.	
9	**R116 (Controlled)**	**Restoration of natural wetlands and outstanding natural wetlands** Relates to livestock access for the purpose of restoration only. **Not applicable.**	
9	**R117 (Discretionary)**	**Activities in natural wetlands** The following activities in a natural wetland except for those stipulated in and carried out in accordance with a wetland restoration management plan under Rule R116 or Regulation 39 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020: a) the placement of structures, and b) the discharge of water or contaminants not permitted by Rule R91, where the adverse effects on aquatic life are no more than minor, and c) the clearance of indigenous wetland vegetation, (excluding the removal of pest plants under Rule R114 and the removal of plants for Māori customary use or for the use of an individual under R115, and vegetation clearance regulated by Regulations 43, 44, 45, 46, 47 and 54 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020), activities not meeting the conditions of Rules R113, R114 or R115, including any associated: d) disturbance of a river or lake bed, or foreshore or seabed that forms part of a natural wetland, and	

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT		
RMA SECTION	**RULE / ACTIVITY**	**RULE DETAIL AND COMMENT**
		e) deposition in, on, or under a river or lake bed, or foreshore or seabed that forms part of a natural wetland, and f) damage to a part of the foreshore or seabed that forms part of a natural wetland, and g) diversion of water, and h) discharge of sediment to water are discretionary activities. are **Discretionary Activities**. The notes section of this rule states the following: *Rule R117(a) prevails over Regulation 42 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 for activities occurring in the bed a natural wetland, but that regulation applies to activities within specified setbacks from the bed of a natural wetland.* *Regulations 45 and 54 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 prevail over Rule R117(a) in respect of vegetation clearance, earthworks or land disturbance or taking, use, damming, diversion or discharge of water associated with the placement of a new structure in the bed of a natural wetland.* *Rule R117(c) prevails over Regulations 40, 41, 42 and 51 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020, for activities occurring in the bed of a natural wetland, but those regulations apply to activities within specified setbacks from the bed of a natural wetland. Regulation 54 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 prevails over Rule 117(c).* **Comment:** The advice notes were included via hearings decisions and appeal mediation prior to the 2022 amendments to the NES-F. Therefore, it is not clear how this rule relates to Regulation 42C of the NES-F. For the avoidance of doubt and for completeness, the Proposal has been assessed against this rule and the applicable NES-F wetland regulations. Therefore, **Discretionary Activity** resource consent is sought under Rule R117.
9	**R118** **(Non-Complying)**	**Activities in natural wetlands** The following activities, in a natural wetland except for those stipulated in and carried out in accordance with a wetland restoration management plan under Rule R116 or Regulation 39 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020: a) take, use, damming or diverting water into, within, or from the natural wetland, or the take and use of water within 50m of the natural wetland, and b) land disturbance including excavation and deposition, and c) reclamation of a natural wetland, including any associated: d) disturbance of a river or lake bed, or foreshore or seabed that forms part of a natural wetland, and e) deposition in, on, or under a river or lake bed, or foreshore or seabed that forms part of a natural wetland, and f) damage to a part of the foreshore or seabed that forms part of a natural wetland, and g) diversion of water, and h) discharge of sediment to water are non-complying activities The notes section of this rule states: *Rule R118(a)-(c) prevails over Regulations 38-51 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020, but those regulations apply to damming or diverting water within 100m of the bed of a natural wetland and take and use within 50-100m of the bed of a natural wetland.* *Regulations 52, 53 and 54 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 prevail over Rule R118(a) and (b).* *Regulation 53 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 prevails over Rule R118(c).* **Comment:** The advice notes were included via hearings decisions and appeal mediation prior to the 2022 amendments to the NES-F. Therefore, it is not clear how this rule relates to Regulation 42C of the NES-F. For the avoidance of doubt and for completeness, the Proposal has been assessed against this rule and the relevant NES-F wetland regulations. Therefore, **Non-Complying Activity** resource consent is sought under Rule R118.
		USES OF BEDS OF LAKES AND RIVERS
5.4.4 USES OF BEDS OF LAKES AND RIVERS GENERAL CONDITIONS Beds of lakes and rivers general conditions for uses of the beds of lakes and rivers that apply as specified in Rules R122 to R129:		
a) except where the discharge is expressly allowed by the activity description of a rule in this chapter there shall be no discharge of contaminants (including but not limited to oil, petrol,		**Will comply**

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT			
RMA SECTION	RULE / ACTIVITY	RULE DETAIL AND COMMENT	
		diesel, paint, solvent, heavy metals or other toxicants) to water or the bed, except where this is the result of the disturbance of sediment and other materials already existing in the water or bed, and	
b)		no cleaning or refuelling of machinery or equipment, or storage of fuel shall take place in, or within 10m of, a river or lake bed, or at any location where fuel can enter any water body, and	**Will comply**
c)		all machinery, equipment and materials used for the activity shall be removed from the river or lake bed every night and on completion of the activity. This includes any excess material from the construction operation, any materials used during construction of any structure but not part of that structure, and any material removed or demolished from any structure, and	**Will comply**
d)		structures are designed, installed and maintained, and activities are carried out in a manner to ensure that fish passage is maintained at all times, except: i. as required for the operation of backflow devices during heavy rainfall events, or ii. a temporary restriction of no more than 48 hours is required for construction or maintenance activities, unless the structure is a culvert or weir, other than a customary weir, installed after 2 September 2020, then iii. the placement, use, alteration, extension or reconstruction of the culvert or weir in, on, over or under the bed of any river or connected area must provide for the same passage of fish upstream and downstream as would exist without the structure, except as required to carry out the construction works. The design, installation, maintenance and use of all structures shall avoid any aggradation or scouring of the bed of the river or lake that may inhibit fish passage, and	**Will comply** All proposed culverts have been designed to ensure fish passage.
e)		in any part of the river bed identified as inanga spawning habitat in Schedule F1 (rivers/lakes), no bed disturbance, diversions of water or sediment discharge shall occur between 1 January and 31 May, except that material accumulated at the outlet of a stormwater discharge pipe may be removed between 1 January and 1 March, so long as there is no associated trimming or removal or vegetation (including weeds) on the bed or banks, and	**Will not comply**. Stream works are proposed in Schedule F1 rivers however fish recovery and relocation conditions are proposed to mitigate these works.
f)		in any part of the river or lake bed covered by water, which is identified as trout spawning waters in Schedule I (trout habitat), disturbance of the bed or diversions of water shall not take place during the spawning period of between 31 May and 31 August, and\	**Not applicable**
g)		all reasonable steps shall be taken to minimise the generation and release of sediment from the activity, and the discharge of any sediment to water from any activity in, on, over or under the bed of a river or lake must not, after reasonable mixing, result in any conspicuous change in the colour of water in the receiving water or change in horizontal visibility of greater than 30%, and	**Will comply**
h)		car bodies or demolition rubble shall not be used for any purpose on the bed of any river or lake, and	**Not applicable**
i)		all reasonable steps shall be taken to minimise the duration of the diversion of water, and any diversion of water required to undertake the activity shall: i. only be temporary and for a period no longer than that required to complete the activity, and ii. must not involve a lake, and iii. any diversion channel required must have sufficient capacity to carry the same flow as the original channel, so as not to cause flooding or erosion of any neighbouring property, and	**Will comply**
j)		the activity shall not result in erosion or scour of the river banks or shall not result in flooding of any neighbouring property, and	**Will comply**
k)		any structure, other than a stormwater intake structure or debris arrestor, shall be designed so that it does not reduce the ability of the river to convey flood flows. All structures shall be maintained to manage flood debris accumulated against the structure and the conveyance of flood flows, and	**Will comply** All new culvert structures have been designed to comply.
l)		any structure shall not alter the natural course of the river, including any diversion of water from the natural course during floods. Tree planting or vegetative bank edge protection works that are limited to the banks of the river and do not extend into the active channel are not considered to alter the course of the river for the purpose of this condition, and	**Will not comply.** Some stream naturalisation works may not comply with this standard so, for the avoidance of doubt, an infringement to this standard is assumed.
m)		the river or lake bed shall not be disturbed to a depth or an extent greater than that required to undertake the activity, and	**Will comply**

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT		
RMA SECTION	**RULE / ACTIVITY**	**RULE DETAIL AND COMMENT**
n) in any part of a river or lake bed identified in Schedule F2a (birds rivers) or Schedule F2b (birds-lakes), no structure shall be constructed, and no disturbance shall take place, during the critical period identified in Schedule F2a (birds-rivers) or Schedule F2b (birds-lakes) if the named birds are identified as nesting, roosting and foraging at the work site, and		**Not applicable**
o) beds of lakes and rivers general conditions (a) to (m) that apply as specified in Rule R127 to R137 do not cover any activities regulated by Sub-Part 4 – River crossings and Sub-Part 10 – General provisions in the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.		**Not applicable**
9	**RULE R122 (Permitted)**	**Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) – permitted activity** **Not applicable** – no existing structures are being replaced.
9	**RULE R125: (Permitted)**	**River crossing structures** The placement or construction of a river crossing structure, including, but not limited to, weirs, fords and bridges, excluding culverts and a river crossing that dams a river, that is fixed in, on, under, or over the bed of a river, excluding activities regulated by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017, including any associated: a) disturbance of the river or lake bed, and b) deposition on the river or lake bed, and c) diversion of water, and d) discharge of sediment to water, and e) temporary damming of water is a Permitted Activity, provided the following conditions are met: f) the activity shall comply with the beds of lakes and rivers general conditions specified above in Section 5.4.4, and g) the river crossing that has any part of the structure fixed in or on the bed has a catchment area above the crossing of not more than: i. 200ha in any catchment in the region on the eastern side of the Ruamāhanga River, or ii. 50ha in any catchment in the region on the western side of the Ruamāhanga River, and h) the formed crossing shall be no wider than what is required for the purpose of the crossing and the total area of the structure in or on the bed of the river shall not exceed 20m2, and i) the activity does not occur within a site identified in Schedule C (mana whenua), and j) the placement of a weir other than a customary weir, in, on over or under the bed of any river or connected area must also comply with the following: i. the fall height of the weir must be no more than 0.5m, and ii. the slope of the weir must be no steeper than 1:30, and iii. the face of the weir must have roughness elements that are mixed grade rocks of 150 to 200mm diameter and irregularly spaced no more than 90mm apart to create a hydraulically diverse flow structure across the weir (including any wetted margins), and iv. the weir's lateral profile must be V-shaped, sloping up at the banks, and with a low-flow channel in the centre, with the lateral cross-section slope between 5° and 10°, and k) for all new weirs (except customary weirs) and fords placed in rivers or connected areas, the information requirements of Regulations 62, and 64 and 67 as relevant for the structure of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 shall be provided as set out in the regulations. **Not applicable – no river crossing structures are proposed.**
CULVERTS *Correspondence with GWRC confirmed that they are now assessing culvert proposals against the regulations in the NES-F. For completeness, an assessment of the proposal culverts and associated works is included below.*		
15	**R122**	**Rule R122: Maintenance, repair, replacement, upgrade or use of existing structures (excluding the Barrage Gates) – Permitted Activity** The maintenance (including maintenance of function), repair, replacement, upgrade or use of a lawfully established structure, or part of a structure, fixed in, on, under or over the bed of a river or lake, including any associated: a) Disturbance of the river or lake bed; and b) Deposition on the river or lake bed; an

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT		
RMA SECTION	**RULE / ACTIVITY**	**RULE DETAIL AND COMMENT**
		c) Diversion of water; and d) Discharge of sediment to water; and e) Temporary damming of water; is a Permitted Activity, provided the following conditions are met: (f) The activity shall comply with the beds of lakes and rivers general conditions specified in Section 5.4.4, except that the use of existing structures is only required to comply with conditions (d), (h), (j) and (k). (g) The resulting structure, excluding any cable, pipe or duct attached to the structure and including any deposition, shall not increase the existing structure by more than whichever is the lesser of: i. 5% of the plan or cross-sectional area of the structure within the river or lake bed; or ii. 1m in horizontal projection and 1m in vertical projection. This is measured from the structure as it existed on 31 July 2015 or the date it was lawfully established, whichever is later. (h) Removal or redistribution of accumulated flood debris or natural bed material for maintaining the function of a structure shall: i. Be undertaken within 5m of the structure; ii. Disturb or excavate no more than 10m² of riverbed; and iii. Not result in deposition of non-natural material or the formation of stockpiles, dams or mounds within the riverbed, except as required for fish passage. (i) Any diversion associated with water monitoring equipment shall not exceed 30m³ per day, with water returned within 50m of the diversion point and receiving water quality maintained. (j) Any replacement, repair or upgrade of a dam shall remain within the existing structure's form, with no increase in size permitted under condition (g). (k) Any use, alteration, extension or reconstruction of a culvert placed in a river or connected area after 2 September 2020 shall also comply with the following: i. The culvert shall be laid parallel to the slope of the riverbed; ii. Mean cross-sectional water velocity within the culvert shall not exceed that of the immediately adjoining river reaches; iii. Culvert width (s) relative to riverbed width (w) shall be: Where w ≤ 3m: s ≥ 1.3 × w. Where w ≥ 3m: s ≥ (1.2 × w) + 0.6m. iv. The culvert shall be open-bottomed or embedded at least 25% of its diameter below the riverbed; v. Bed substrate shall be present throughout the culvert and remain stable at flows equalled or exceeded 80% of the time; and vi. The culvert shall provide for continuity of geomorphic processes, including sediment and debris movement. (l) Any use, alteration, extension or reconstruction of a weir placed after 2 September 2020 shall comply with the specified fall height, slope, roughness and lateral profile requirements. (m) For alterations, extensions, reconstructions or replacements of relevant structures placed after 2 September 2020, the applicable information requirements of Regulations 62–68 of the NES-F shall be provided. **Comment:** The Proposal includes a minor extension to existing Culvert H. For the purposes of this assessment, it is conservatively assumed that the proposed extension will not comply with the permitted activity conditions of Rule R122, particularly the limitations on increasing the size of an existing structure under condition (g). Accordingly, **Discretionary Activity** resource consent is sought under Rule R145 for the proposed culvert extension.
15	**R126 CULVERTS (Permitted)** **R145- (Discretionary Activity)**	The placement of a culvert or an ancillary culvert structure that is fixed in, or on, the bed of a river excluding activities regulated by the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017 including any associated: (a) disturbance of the river or lake bed, and (b) deposition on the river or lake bed, and (c) diversion of water, and (d) discharge of sediment to water, and (e) temporary damming of water, and is a Permitted Activity, provided the following conditions are met: (f) the activity shall comply with the beds of lakes and rivers general conditions specified above in Section 5.5.4, except condition (l) (not altering the natural course of the river), and — **Will not comply**. Refer assessment above

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RMA SECTION	RULE / ACTIVITY	RULE DETAIL AND COMMENT	
		(g) the activity does not occur within a site identified in Schedule C (mana whenua), and	**Will not comply** The Wharemauku Stream and its tributaries is included in Schedule C.
		(h) where multiple culverts are placed side by side, the total capacity of the multiple culverts shall not be less than that of a single culvert which complies with this rule, and	**Not applicable** Culverts will not be placed side by side.
		(i) the culvert, associated fill and culvert placement shall comply with the following dimensions: (i)a maximum culvert length of 20m, and (ii) for circular culverts a culvert diameter of 0.3m to 1.2m (inclusive), and (iii) for non-circular culverts a width and height of 0.3m to 1.2m each (inclusive), and (iv) the culverts width where it intersects with the bed of the river or connected area must be more than 1.3 times the width of the bed in that location, (v) a maximum fill height of 2m above the top of the culvert unless a spillway is constructed to enable the passage of a 5% annual exceedance probability (20 year return period) flood event without the fill being overtopped, and	**Will not comply** Culvert A is a rectangular structure measuring 4.0 m wide by 1.5m high, with a length of 32.5m. Culvert J comprises twin 1.35m diameter barrels, with a length of 34m. Both exceed the maximum permitted length of 20m, while their dimensions also exceed the permitted limits. The culvert sizes have been established to accommodate the proposed road crossings and required flow conveyance.
		(j) a minimum culvert installation depth below the bed of 250% of the width of the culvert, or the culvert must be open bottomed, and	**Designed to comply** The SMP specifies a minimum embedment of 25% for both culverts, with final installation details to be confirmed at detailed design.
		(k) the bed substrate must be present over the full length of the culvert and stable at the flow rate at or below which the water flows for 80% of the time; and	**Designed to comply** The proposed embedment will allow for the establishment of bed substrate through the culverts. Substrate specifications and stability will be confirmed through detailed design, including the applicable fish passage requirements.
		(l) the culvert shall be positioned so that its alignment and gradient are the same as the river, and	**Designed to comply** Culvert alignment and gradients will be confirmed at detailed design to integrate with the adjoining watercourse reaches.
		(m) the mean cross-sectional water velocity in the culvert must be no greater than that in all immediately adjoining river reaches; and	**Designed to comply** Culvert design will address water velocities and fish passage requirements, with final hydraulic characteristics to be confirmed at detailed design.
		(n) the culvert shall be constructed to allow: (i) the flow from a 5% annual exceedance probability (20 year return period) flood event without overtopping, unless the overtopping flows to a specifically designed spillway, and (ii) the flow from a two year return period flood event without any flow impediment, and	**Designed to comply** The hydraulic performance of the culverts has been incorporated into the flood modelling undertaken for the Flood Risk Assessment. The final design will confirm the required flow conveyance capacity.
		(o) the culvert inlet and outlet shall be protected against erosion,	**Designed to comply** Concrete headwalls are proposed at the inlets and outlets of both culverts. Additional erosion and scour protection will be determined at detailed design.

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT			
RMA SECTION	**RULE / ACTIVITY**	**RULE DETAIL AND COMMENT**	
		(p) any ancillary culvert structure shall not occupy a total bed area of greater than 10m2, and	**Will not comply** The ancillary structures associated with the proposed culverts are understood to exceed the permitted bed occupation threshold.
		(q) all practicable steps shall be taken to minimise the release of sediment during construction, and	**Will comply.** Refer ESC details included in the ECMP.
		(r) the culvert shall be constructed and maintained to avoid any aggradation or erosion of the bed, including any erosion at the inlet and outlet of the culvert, and	**Will comply.** Refer ESC details included in the ECMP.
		(r) the culvert shall be constructed and maintained to avoid any aggradation or erosion of the bed, including any erosion at the inlet and outlet of the culvert, and	**Will comply.** Refer ESC details included in the ECMP.
		(s) the culvert shall be constructed and maintained to avoid causing any flooding on any neighbouring properties, and	**Designed to comply** The culverts have been incorporated into the flood modelling for the development and will be designed to provide appropriate flow conveyance without increasing flood risk to neighbouring properties.
		(t) the culvert provides for continuity of geomorphic processes (such as the movement of sediment and debris); and	**Designed to comply** The culverts will incorporate embedded bed substrates and be designed to provide for the continued movement of sediment and debris through the watercourses, subject to detailed design.
		(u) the information requirements of Regulations 62, 63 and 68 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 shall be provided as set out in the regulation.	**Will comply** Refer NES-F assessment
		Due to non-compliances with the Permitted Activity Standards, **Discretionary Activity** consent is required under Rule R145 being: *Rule R145: All other uses of river and lake beds – discretionary activity*	
9	**R129 (Restricted Discretionary)**	**Rule R129: Structures within a site identified in Schedule C (mana whenua) – restricted discretionary activity** The placement of a river crossing structure, a culvert, new dam, or other structure that that is fixed in, on, under, or over the bed of a river within a site identified in Schedule C (mana whenua), including any associated: (a) (b) (c) (d) disturbance of the river or lake bed, and deposition on the river or lake bed, and diversion of water, and damming of water, and discharge of sediment to water the damming of water outside the bed of a lake or river by a dam structure is a restricted discretionary activity, provided the following conditions are met: (g) any river crossing (other than a culvert) must meet the conditions of Rule R125, except condition (i), and (h) any culvert must meet the conditions of Rule R126, except condition (h), and (i) any new small dam structure, must meet the conditions of Rule R127, except condition (h), and any other small new structure must meet the conditions of Rule R128 except condition (g). *Matters for discretion* *1. Effects on sites identified in Schedule C (mana whenua) with significant mana whenua values* **Comment:** The Wharemaukū Stream and its tributaries are identified in Schedule C (mana whenua) of the NRP. As outlined above the proposed culverts do not comply with all the standards in Rule R126.	

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT			
RMA SECTION	RULE / ACTIVITY	RULE DETAIL AND COMMENT	
		Therefore, **Discretionary Activity** resource consent is required under Rule R145.	
9	**R142 (Discretionary)**	Reclamation of the bed of a river or lake outside of a site identified in Schedule A1 (outstanding rivers), Schedule A2 (outstanding lakes) or Schedule C (mana whenua) **Does not apply:** No reclamation of a river is proposed.	
9	**R143 (Non Complying)**	Reclamation associated with piping of a river outside of a site identified in Schedule A1 (outstanding rivers) or Schedule C (mana whenua) **Does not apply:** No reclamation or piping of a river is proposed.	
		RECLAMATION AND PLACEMENT OF A DAM	
		Comment: *The proposed wetland and flood storage area is intended to accommodate and manage floodwaters through the reconfiguration of the existing floodplain, rather than function as a conventional dam structure. While the proposed works are not considered to constitute a dam for the purposes of the Building Act 2004, for the avoidance of doubt, the flood storage function of the wetland area has been assessed against the relevant damming and diversion rules of the Natural Resources Plan. This assessment has been undertaken on a conservative basis to ensure that any associated consenting requirements are appropriately addressed.*	
9	**R127 (Permitted)**	**Establishing a dam** The placement of a new dam, that is fixed in, on, or under the bed of a river including any associated: a) disturbance of the river or lake bed, and b) deposition on the river or lake bed, and c) diversion of water, and d) damming of water, and e) discharge of sediment to water, and f) the damming of water outside the bed of a lake or river by a dam structure is a Permitted Activity, provided the following conditions are met:	
		g) where the dam occurs in the bed of a lake or river, the activity shall comply with the beds of lakes and rivers general conditions specified above in Section 5.4.4, except condition (l) (not altering the natural course of the river), and, where the activity occurs in an ephemeral watercourse, condition (d) (fish passage), and	**Not applicable**
		h) the activity does not occur within a site identified in Schedule C (mana whenua), and	**Will not comply.** The Wharemauku Stream and its tributaries are in Schedule C.
		i) the dam is not located in and does not cause water to pond in, a natural wetland identified in Schedule F3 (identified natural wetlands) or an outstanding water body identified in Schedule A (outstanding water bodies), and	**Will comply.** The proposed wetland complex will not cause water to permanent pond in any Schedule F3 or Schedule A waterbodies.
		j) the dam shall not impound more than 20,000m3 of water above natural ground level, and	**Will not comply** Although temporary (i.e. only in storm events) the proposed wetland complex will store up to 26,000m^3 of water.
		k) the dam has a maximum water depth of less than 3m (measured from the natural ground level at the downstream toe of the dam structure), and	**Complies** The flood storage height will not exceed 3m.
		l) any new dam does not have a catchment area above the dam of more than 20ha, and (m) the water impounded by the dam does not encroach onto adjoining properties, and	**Will not comply** The catchment area exceeds 20ha.
		m) a spillway or overflow pipe is constructed to prevent the dam from overtopping in a 5% annual exceedance probability (20 year return period) flood event, and connects or discharges to the downstream watercourse, and	**Addressed through flood management design** The Proposal does not involve a conventional dam structure requiring a dedicated spillway or overflow pipe. The proposed wetland area forms part of the wider flood management system, with floodwaters conveyed through the designed drainage network.
		o) any new dam in a permanently flowing river shall maintain a flow out of the dam at all times including during filling of the	**Not applicable.**

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT		
RMA SECTION	**RULE / ACTIVITY**	**RULE DETAIL AND COMMENT**
		dam. *Note If a dam retains 4m or more depth or holds 20,000m3 of water or more, then a building consent is required in accordance with the Building Act 1991. This rule does not permit the taking of water from behind the dam structure. This is controlled by other rules in the Plan.* — The dam is not in a permanently flowing river.
		As the proposed dam does not meet all of the standards outlined above, it is subject to Rule R147. See assessment below.
	R147 (Discretionary)	**Damming or diverting water within or from rivers** The damming or diverting of water within or from a river that does not meet Rules R122, R125, R126, R127, R128, R130, R131, R134, R137 and R138 and R159 is a discretionary activity, provided the following conditions are met: a) the damming or diverting of water shall not result in river flows falling below minimum flows in chapters 7 to 11 of the Plan, and b) the damming or diverting of water is not in any outstanding river identified in Schedule A1 (outstanding rivers). The above conditions are complied with. Therefore, **Discretionary Activity** resource consent is required under Rule R147.
		DEWATERING
	R159 (Permitted)	**Dewatering** The take of groundwater and the associated diversion and discharge of that water for the purpose of dewatering a site (including the use of land associated with well pointing), is a permitted activity, provided the following conditions are met: a) the take continues only for the time required to carry out the work but does not exceed one month, and b) the discharge point is not located within 20m of a bore used for water abstraction for potable supply or stock water; c) the take and diversion and discharge is not from, onto or into: i. SLUR Category III land, or ii. within a community drinking water supply protection area shown on Maps 40, 41, 42 or 43, or iii. land where an activity or industry described in the Ministry for the Environment Hazardous Activities and Industries List 2011 is, or has been undertaken, and d) the take does not cause ground subsidence, and e) the take does not deplete water in a surface water body, and f) there is no flooding beyond the boundary of the property, and g) where a discharge is to water, or to land where it may enter a surface water body:, i. at the point of discharge the quality of the discharge shall not exceed: 1. 50g/m3 of total suspended solids where the discharge is to a site or habitat identified in Schedule A (outstanding water bodies), Schedule C (mana whenua), Schedule F1 (rivers/lakes), Schedule F3 (identified natural wetlands), Schedule F4 (coastal sites) or Schedule H1 (contact recreation); or 2. 3. 2. 100g/m3 of total suspended solids where the discharge is to any site or habitat not referred to in condition (i); or 3. the maximum acceptable value (MAV) for any determinand in the Drinking-Water Standards New Zealand 2005 (Revised 2008) in a community drinking water supply protection area shown on Map 39, and ii. after the zone of reasonable mixing, the discharge shall not cause: 1. a value in Schedule V for the protection of 99% of species to be exceeded in a river identified in Schedule F1 (rivers/lakes) having macroinvertebrate community health; or 2. a value in Schedule V for the protection of 95% of species to be exceeded in any other river or lake; and h) where a discharge is onto or into land where it may enter groundwater within a community drinking water supply protection area shown on Maps 40, 41, 42 or 43, the quality of the discharge at the discharge point shall not exceed the maximum acceptable value (MAV) for any determinand in the Drinking-Water Standards New Zealand 2005 (Revised 2008), and i) where the dewatering is located within the Hutt Valley Aquifer Protection Zone shown on Map 49, any construction or removal of building foundations or earth retention structures or excavation (permanent or temporary) associated with the dewatering does not exceed a depth of 5m below the natural ground level. **Comment:**

TABLE 3: GWRC NRP RULE AND STANDARD ASSESSMENT		
RMA SECTION	RULE / ACTIVITY	RULE DETAIL AND COMMENT
		Dewatering will be required during construction of the Proposal and is anticipated to extend beyond the one-month duration specified in condition (a). Accordingly, the permitted activity requirements of Rule R159 will not be met. All other conditions of Rule R159 can be complied with or are not applicable to the Proposal.
	R160 (Restricted Discretionary Activity)	**Dewatering** The take of groundwater and the associated diversion and discharge of that water (including the use of land associated with well pointing) for the purpose of dewatering a site that is not permitted by Rule R159 is a restricted discretionary activity, provided the following condition is met: a) where the dewatering is located within a community drinking water supply protection area shown on Map 40, Map 41, Map 42 or Map 43, or the Hutt Valley Aquifer Protection Zone shown on Map 49, any construction or removal of building foundations or earth retention structures or excavation (permanent or temporary) associated with the dewatering does not exceed a depth of 5m below the natural ground level. **Comment:** The proposal complies with this rule and therefore resource consent is sought for dewatering as a **Restricted Discretionary Activity** under Rule R160. Under this rule, Council has restricted discretion to the following: *Matters for discretion* *1. Duration, location, volume and rate of take, diversion or discharge* *2. Quality of the discharge* *3. Effects of land subsidence* *4. Interference effects on lawfully existing water takes* *5. Effects on surface water bodies* *6. Effects of contamination on land, soil and water* *7. Measuring, monitoring and reporting.*
		BORES
	R166 (Controlled)	**Drilling, construction or alteration of any bore – controlled activity** The use of land and the associated diversion and discharge of water or contaminants for drilling, construction or alteration of a bore that is not permitted by Rules R164 or R165 is a controlled activity, provided the following conditions are met: a) the bore is not associated with hydrocarbon exploration or production, and b) the bore is constructed, operated and/or decommissioned in accordance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock Matters of control *Matters of Control* *1. Compliance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock* *2. Bore location, size (including diameter of the bore casing), casing type and depth* *3. Bore screening depth and type* *4. Backflow prevention methods* *5. Information requirements including bore logs, piezometric levels, groundwater tests, and bore construction details* 6. *Management of the effects of any discharge of contaminants* **Comment:** The proposed construction bore will comply with these standards and is therefore a Controlled Activity under Rule R166.

4. NATURAL RESOURCES PLAN OBJECTIVES AND POLICIES

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES

PROVISION	COMMENT
NATURAL RESOURCES PLAN	
Ki Uta Ki Tai and Integrated Catchment Management	
Objective O1 seeks that air, land, freshwater and the coastal marine area are managed as integrated and connected resources. Objective O2 recognises that the social, economic and cultural well-being and health of people and the community interacts with air, land, water and ecosystems. Objective O3 requires the enhancement and replenishment of mauri.	
OBJECTIVE O1 **Air, land, fresh water bodies and the coastal marine area are managed as integrated and connected resources; ki uta ki tai – mountains to the sea.** **OBJECTIVE O2** **The importance and contribution of air, land and water to the social, economic and cultural well-being of the community are recognised in the management and, where applicable, allocation of those resources.** **OBJECTIVE O3** **Mauri particularly the mauri of fresh and coastal waters is sustained and, where it has been depleted, natural resources and processes are enhanced to replenish mauri.** **OBJECTIVE O4** **The intrinsic values of fresh water and marine ecosystems are recognised and the life supporting capacity of water is safeguarded.**	Objectives O1 and O2, and Policy P1 are concerned with the integrated management of natural resources. The Proposal has been informed by ecological, freshwater, hydrological and engineering assessments, recognising the connections between land use, groundwater, surface water, freshwater ecosystems and the wider Wharemaukū Stream catchment. The *Hydrological Effects Assessment* has considered the relationships between the existing wetlands, shallow groundwater, surface water drainage and the Wharemaukū Stream, including the changes that will result from the proposed earthworks, changes to ground levels and establishment of new drainage and stormwater infrastructure. These considerations have informed the integrated design of the development, including the stormwater management system, flood storage areas and proposed wetland compensation complex. While the Proposal involves the reclamation of existing wetlands, the effects management hierarchy has been applied, with residual ecological effects addressed through the creation of a substantial indigenous wetland complex, together with enhancement and riparian planting of the Wharemaukū Stream corridor. The compensation wetland has been designed to receive water from the realigned Watercourse 1 and the eastern part of the Site, with ground levels and water supply arrangements intended to establish suitable inundation and saturation conditions for a range of wetland habitats. The wetland will also provide flood storage functions as part of the wider stormwater and flood management network. Ongoing hydrological and ecological monitoring, together with adaptive management, will support the establishment and long-term functioning of the compensation wetland. Overall, the Proposal adopts an integrated approach to managing land and freshwater resources, recognising their interconnected nature and providing for the enhancement of freshwater ecosystem values alongside the social and economic benefits of developing the Site.
POLICY P1 - KI UTA KI TAI AND INTEGRATED CATCHMENT MANAGEMENT Air, land, fresh water bodies and the coastal marine area will be managed recognising ki uta ki tai by using the principles of integrated catchment management. These principles include: (a) decision-making using the catchment as the spatial unit, and (b) applying an adaptive management approach to take into account the dynamic nature and processes of catchments, and (c) coordinated management, with decisions based on best available information and improvements in technology and science, and (d) taking into account the connected nature of resources and natural processes within a catchment, and (e) recognising links between environmental, social, cultural and economic sustainability of the catchment.	
POLICY P4 - PRECAUTIONARY APPROACH Use and development shall be managed with a precautionary approach where there is limited information regarding the effects and any adverse effects are potentially significant.	The application is supported by comprehensive technical assessments addressing the potential effects of the Proposal, including the reclamation of wetlands, modification of dunes and changes to the existing floodplain. These assessments have informed the design of the Proposal and the identification of appropriate measures to avoid, remedy, mitigate or otherwise manage adverse effects. The proposed consent conditions provide for detailed design, ecological management, monitoring, performance measures and adaptive management, where required, to ensure that the anticipated environmental outcomes are achieved. Accordingly, the Proposal incorporates a precautionary approach through its design, proposed management measures and consent conditions, consistent with Policy P4.
BENEFICAL USE AND DEVELOPMENT	

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
OBJECTIVE O6 **The social, economic, cultural and environmental benefits of taking and using water are recognised, when managing water.**	The Proposal is consistent with Objective O6. The proposed groundwater take is temporary and limited to construction purposes, with water from the proposed bore used to support construction activities.
OBJECTIVE O7 **The recreational values of the coastal marine area, rivers and lakes and their margins and natural wetlands are maintained and where appropriate for recreational purposes, is enhanced.** **OBJECTIVE O8** **Public access to and along the coastal marine area and rivers and lakes is maintained and enhanced, other than in exceptional circumstances, in which case alternative access is provided where practicable.**	The Proposal is consistent with Objectives O7 and O8. The Site is currently largely undeveloped, with existing public access principally limited to the Wharemaukū Stream path, part of which is located within the Site. The Proposal will substantially expand this existing access through a wider network of pedestrian and cycle connections, publicly accessible open spaces and recreational areas. The Wharemaukū Stream corridor will be retained and enhanced, while the proposed wetland/flood storage area will be vested in KCDC and form part of the wider open space network. The new connections will integrate with the existing Wharemaukū Stream path and wider shared path network, enhancing public access to and along the Stream and providing significantly greater opportunities for recreation and enjoyment of the Site.
POLICY P6 USES OF LAND AND WATER The cultural, social and economic benefits of using land and water for: a) treatment, dilution and disposal of wastewater and stormwater, and b) industrial processes and commercial uses associated with the potable water supply network, and c) community and domestic water supply, and d) food production and harvesting (including aquaculture), and e) gravel extraction from rivers for flood protection and control purposes, and f) irrigation and stock water, and g) firefighting (emergency or training purposes), and h) contact recreation and Māori customary use, and i) transportation, including along, across, and access to, water bodies, and j) enabling urban development where it maintains the quality of the natural environment, and k) waste management facilities shall be recognised.	The Proposal is consistent with Policy P6. In particular, the Proposal will enable significant urban development within the Metropolitan Centre Zone, while incorporating measures to maintain and enhance the quality of the natural environment. These include enhancement of the Wharemaukū Stream corridor, establishment of the proposed wetland area, native planting and an integrated open space network. The Proposal also provides for the management of stormwater and flood risk and improved opportunities for public access and recreation associated with the Stream and wetland areas. Accordingly, the relevant social, cultural and economic benefits of using land and water are appropriately recognised.
POLICY P7: BENEFICIAL ACTIVITIES The following activities are recognised as beneficial and generally appropriate: (a) activities for the purpose of restoring natural character, aquatic ecosystem health, mahinga kai, outstanding water bodies, sites with significant mana whenua values, and sites with significant indigenous biodiversity values, and (b) activities that restore natural features such as beaches, dunes or wetlands that can buffer development from natural hazards, and (c) day-lighting of piped streams, and (d) removal of aquatic weeds, and pest plants and animal pests, and (e) the establishment of river crossings (culverts and bridges) or fences and fence structures that will result in the exclusion of regular livestock access from a water body, and (f) the retirement, fencing and planting and management of riparian margins, and (g) the retirement of erosion prone land from livestock access, and (h) maintenance, and use and upgrade of existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes (noting that Policy P33 will apply with respect to fish passage), and	The Proposal incorporates a number of activities recognised as beneficial under Policy P7. In particular, the Proposal includes restoration and enhancement of the Wharemaukū Stream and its riparian margins, native planting and pest plant management, together with the creation and enhancement of wetland habitat. The proposed wetland and wider open space network will improve ecological values and public access through the Site. These aspects of the Proposal are consistent with the beneficial activities recognised by Policy P7.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
(i) removal of dangerous or derelict structures in the coastal marine area, natural wetlands and beds of lakes and rivers, and (j) structures necessary to provide for monitoring resource use or the state of the environment in the coastal marine area, natural wetlands and beds of lakes and rivers, and (k) activities necessary to maintain safe navigation, and (l) artworks that support and enhance public open space.	
POLICY P8 - PUBLIC ACCESS TO AND ALONG THE COASTAL MARINE AREA AND THE BEDS OF LAKES AND RIVERS Maintain and enhance the extent or quality of public access to and along the coastal marine area and the beds of lakes and rivers except where it is necessary to: (a) protect the values of estuaries, sites with significant mana whenua values identified in Schedule C (mana whenua), sites with significant historic heritage value identified in Schedule E (historic heritage) and sites with significant indigenous biodiversity value identified in Schedule F (indigenous biodiversity), or (b) protect public health and safety, or protect Wellington International Airport and Commercial Port Area security, or (c) provide for a temporary activity such as construction, a recreation or cultural event or stock movement, and where the temporary restrictions shall be for no longer than reasonably necessary before access is fully reinstated, and with respect to (a) and (b), where it is necessary to permanently restrict or remove existing public access, the loss of public access shall be mitigated or offset by providing enhanced public access at a similar or nearby location to the extent reasonably practicable.	The Proposal is consistent with Policy P8. Existing public access along the Wharemaukū Stream will be maintained, except for any temporary restrictions required during construction. The Proposal will also enhance public access through the wider pedestrian and cycle network, including new connections to the Stream corridor and proposed open space areas. Overall, the Proposal will result in a significant improvement in the extent and quality of public access to and along the Wharemaukū Stream.
POLICY P9: CONTACT RECREATION AND MĀORI CUSTOMARY USE Use and development shall avoid, remedy or mitigate any adverse effects on contact recreation and Māori customary use in fresh and coastal water, including by: (a) providing water quality and, in rivers, flows suitable for contact recreation and Māori customary use, and (b) managing activities to maintain or enhance contact recreation values in the beds of lakes and rivers, including by retaining existing swimming holes and maintaining access to existing contact recreation locations, and (c) encouraging improved access to suitable swimming and surfing locations, and (d) providing for the passive recreation and amenity values of fresh water bodies and the coastal marine area.	The Proposal is consistent with Policy P9. The Wharemaukū Stream will be retained and enhanced through riparian planting and restoration, with stormwater appropriately managed to protect freshwater values. The Proposal will also enhance passive recreation and amenity through the proposed open space network and improved pedestrian and cycle access along and to the Stream corridor.
POLICY P11: BENEFITS OF REGIONALLY SIGNIFICANT INFRASTRUCTURE AND RENEWABLE ELECTRICITY GENERATION FACILITIES When considering proposals that relate to the provision of Regionally Significant Infrastructure, or renewable energy generation activities, particular regard will be given to the benefits of those activities. POLICY P13: PROVIDING FOR REGIONALLY SIGNIFICANT INFRASTRUCTURE AND RENEWABLE ELECTRICITY GENERATION ACTIVITIES The use, development, operation, maintenance, and upgrade of Regionally Significant Infrastructure and renewable energy generation activities are provided for, in appropriate places and ways. This includes by having particular regard to: (a) the strategic integration of infrastructure and land use, and (b) the location of existing infrastructure and structures, and (c) the need for renewable energy generation activities to locate where the renewable energy resources exist, and	There is an 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. The Proposal includes new and extended infrastructure necessary to service the development of the Site, including transport connections and three waters infrastructure. The new road network will improve connectivity through the Metropolitan Centre, while extensions to water supply, wastewater and stormwater infrastructure will support the planned urban development of the Site. The proposal also incorporates flood management infrastructure, including the proposed flood storage area which will provide benefits beyond the Site through improved management of flood risk within the wider catchment. Overall, the proposal appropriately integrates infrastructure and land use and recognises the wider benefits associated with the provision and extension of infrastructure required to support urban growth. The Proposal is therefore consistent with Policies P11 and P13.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
(d) the functional need and operational requirements associated with developing, operating, maintaining and upgrading Regionally Significant Infrastructure and renewable energy generation activities	
MAORI RELATIONSHIPS	
Objective O12 is to recognise the relationship of Māori with their ancestral land, and Objective O13 requires recognition of kaitiakitanga and mana whenua participation in planning and decision making. Policy P9 requires freshwater to be of a quality suitable for Māori customary use, Policy P18 requires the consideration of mauri in freshwater, Policy P19 considers Mana whenua relationships with Ngā Taonga Nui a Kiwa (which applies to the Waimeha Stream and tributaries), Policy P20 requires recognition of Māori values, Policy P21 concerns the exercise of kaitiakitanga and Policy P22 concerns statutory acknowledgements.	
OBJECTIVE O12 The relationships of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga are recognised and provided for, including: (a) maintaining and improving opportunities for Māori customary use of the coastal marine area, rivers, lakes and their margins and natural wetlands, and (b) maintaining and improving the availability of mahinga kai species, in terms of quantity, quality and diversity, to support Māori customary harvest, and (c) providing for the relationship of mana whenua with Ngā Taonga Nui a Kiwa, and (d) protecting sites with significant mana whenua values from use and development that will adversely affect their values and restoring those sites to a state where their characteristics and qualities sustain the identified values. OBJECTIVE O13 Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making in relation to the use, development and protection of natural and physical resources. POLICY P19: Mana whenua relationships with Ngā Taonga Nui a Kiwa. The relationships between mana whenua and Ngā Huanga o Ngā Taonga Nui a Kiwa identified in Schedule B (Ngā Taonga Nui a Kiwa) will be recognised and provided for by: (a) having particular regard to the values and Ngā Taonga Nui a Kiwa huanga identified in Schedule B (Ngā Taonga Nui a Kiwa) when applying for, and making decisions on resource consent applications, and developing Whaitua Implementation Programmes, and (b) informing iwi authorities of relevant resource consents relating to Ngā Taonga Nui a Kiwa, and (c) recognising the relevant iwi authority/ies as an affected party under RMA s95E where activities risk having a minor or more than minor adverse effect on Ngā Huanga o Ngā Taonga Nui a Kiwa or on the significant values of a Schedule C site which is located downstream, and (d) working with mana whenua, landowners, and other interested parties as appropriate, to develop and implement restoration initiatives within Ngā Taonga Nui a Kiwa, and (e) the Wellington Regional Council and iwi authorities implementing kaupapa Māori monitoring of Ngā Taonga Nui a Kiwa.	Engagement has been undertaken with Te Ātiawa ki Whakarongotai Charitable Trust in relation to the Proposal, as outlined in the Consultation Summary Report (**Appendix 38**). An *interim Cultural Impact Assessment* has also been prepared by Te Ātiawa (Appendix 33), which identifies concerns regarding the proposed modification of dune landforms, reclamation of existing wetlands and the treatment of the Wharemaukū Stream. Further discussions have been held with Te Ātiawa regarding the matters raised in the assessment, including the engineering and design considerations associated with the proposed dune modifications and opportunities for further enhancement of the Wharemaukū Stream. While these discussions have assisted in identifying the matters of particular concern to Te Ātiawa, agreement has not been reached on all aspects of the Proposal, and engagement remains ongoing. The Proposal includes the establishment of an indigenous wetland compensation complex, enhancement planting along the Wharemaukū Stream and stormwater treatment measures intended to manage effects on freshwater receiving environments. These measures are primarily proposed to address ecological requirements, but are also relevant to the freshwater environments and associated values addressed by Objective O12 and Policy P19. Of particular relevance to Objective O13, the proposed GWRC consent conditions seek to provide for ongoing involvement of Te Ātiawa in the detailed design, implementation and monitoring of the proposed wetland compensation complex and relevant ecological management measures. This includes opportunities for input into the preparation and implementation of ecological management plans addressing freshwater fish, avifauna, lizards and vegetation, together with the monitoring and adaptive management of the proposed wetland restoration works. These conditions provide a mechanism for Te Ātiawa to be involved in aspects of the Proposal following the granting of consent. In relation to Policy P19, the proposed freshwater management and restoration measures are relevant to the protection of the Wharemaukū Stream and downstream receiving environments. The consultation undertaken with Te Ātiawa and the opportunities for ongoing involvement provided through the GWRC conditions are also relevant to recognising mana whenua relationships with these environments.
POLICY P18 - MAURI The mauri of fresh and coastal waters shall be recognised as being important to Māori and is sustained and enhanced, including by: (a) managing the individual and cumulative adverse effects of activities that may impact on mauri in the manner set out in the rest of the Plan, and (b) providing for those activities that sustain and enhance mauri, and (c) recognising and providing for the role of kaitiaki in sustaining mauri.	The Proposal involves the reclamation of existing wetlands and modification of watercourses, with associated cultural concerns identified in the *Interim Cultural Impact Assessment* prepared by Te Ātiawa ki Whakarongotai. The proposed wetland compensation complex, Wharemaukū Stream enhancements, stormwater treatment and ecological management measures seek to manage effects on freshwater environments. The proposed GWRC consent conditions also provide for ongoing Te Ātiawa involvement in the

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	detailed design, implementation and monitoring of relevant ecological measures, recognising the role of kaitiaki. These measures are relevant to sustaining mauri and the outcomes sought by Policy P18.
POLICY P20 - MĀORI VALUES The cultural relationship of Māori with air, land and water shall be recognised and the adverse effects on this relationship and their values shall be minimised.	The cultural relationship of mana whenua with the Site and its freshwater environments has been identified through engagement with Te Ātiawa ki Whakarongotai and the preparation of the *Interim Cultural Impact Assessment*. The assessment identifies concerns regarding the proposed dune modifications, wetland reclamation and treatment of the Wharemaukū Stream. The Proposal includes freshwater enhancement, wetland compensation and stormwater management measures, while the proposed GWRC consent conditions provide for ongoing Te Ātiawa involvement in the detailed design, implementation and monitoring of relevant ecological measures. These measures are relevant to Policy P20, although the cultural concerns identified in the assessment have not been fully resolved and remain relevant to the assessment of adverse effects on Māori values.
POLICY P21 - EXERCISE OF KAITIAKITANGA Kaitiakitanga shall be recognised and provided for by involving mana whenua in the assessment and decision-making processes associated with use and development of natural and physical resources including; (a) managing activities in sites with significant mana whenua values listed in Schedule C (mana whenua) in accordance with tikanga and kaupapa Māori as exercised by mana whenua, and (b) the identification and inclusion of mana whenua attributes and values in the kaitiaki information and monitoring strategy in accordance with Method M2, and (c) identification of mana whenua values and attributes and their application through tikanga and kaupapa Māori in the maintenance and enhancement of mana whenua relationships with Ngā Taonga Nui a Kiwa.	Engagement with Te Ātiawa has been undertaken, including through the preparation of the interim Cultural Impact Assessment, which identifies concerns regarding the proposed modification of the Stream, wetland reclamation and dune modifications. The proposed GWRC consent conditions provide for ongoing Te Ātiawa involvement in the detailed design, implementation and monitoring of the wetland compensation complex, Wharemaukū Stream enhancements and associated ecological management measures. This provides opportunities for the exercise of kaitiakitanga during implementation of the Proposal. These arrangements are consistent with the intent of Policy P21 to involve mana whenua in the management of freshwater environments, although the matters raised in the assessment have not been fully resolved.
NATURAL CHARACTER, FORM AND FUNCTION	
Objective O14 seeks to preserve and protect the natural character of natural wetlands and rivers and their margins from inappropriate use and development. Policy P24 details how this is to be achieved, which for areas that are not considered to have high natural character, is to avoid, remedy or mitigate adverse effects on natural character.	
OBJECTIVE O14 The natural character of the coastal marine area, natural wetlands, and rivers, lakes and their margins is preserved and protected from inappropriate use and development. POLICY P24 - PRESERVING AND PROTECTING NATURAL CHARACTER FROM INAPPROPRIATE USE AND DEVELOPMENT To preserve natural character and protect it from inappropriate use and development by: (a) avoiding adverse effects of activities on the natural character of areas within the coastal environment that have outstanding natural character, and (b) avoiding significant adverse effects and avoid remedy and mitigate other adverse effects of activities on the natural character of areas within the coastal environment that do not have outstanding natural character, and (c) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that have outstanding natural character, provided that the outstanding natural character of the area taken as a whole is retained, and (d) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating significant adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that have high natural character, provided that the high natural character of the area taken as a whole is retained, and	The *Landscape and Visual Impact Assessment* states the following with respect to Objective O14: *The site is not identified as an Outstanding Natural Feature or Landscape; however, it does contain dune landforms, the Wharemauku Stream, and wetlands that contribute to the natural character of the coastal environment. The proposal will modify these features, including the removal of the eastern dune and removal of the western dune with a new landform to extent from its former southern extent. The landform will be replanted and integrated into the development. Wharemauku Stream will remain in its existing alignment and permanent-flow function, with native riparian planting, variable channel depth and substrate, and a flood-event connection to the proposed wetland. These measures, together with the wider wetland and open-space network, will assist in maintaining and improving natural character and landscape amenity. Overall, the proposal recognises the relevant landscape and natural character values of the site and provides for their retention, enhancement, or mitigation.* The Site is within the coastal environment but is not identified as having outstanding natural character. Accordingly, Policy P24(b) is relevant. The Site is substantially modified, although natural character values remain associated with the dune landforms, Wharemaukū Stream and wetlands. The proposal will further modify these features, including through wetland reclamation and modification of dune landforms. However, the Wharemaukū Stream will be retained and enhanced, and substantial indigenous wetland, riparian and terrestrial restoration is proposed as part of the wider open space network. Overall, the proposal is considered to appropriately avoid significant adverse effects and remedy or mitigate other adverse effects on natural character, and is therefore consistent with Policy P24.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
(e) outside the coastal environment, avoiding, remedying or mitigating other adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that are not addressed under (c) or (d) of Policy P24.	
NATURAL HAZARDS	
OBJECTIVE O15 **The hazard risk and residual hazard risk, from natural hazards and adverse effects of climate change, on people, the community, the environment and infrastructure are acceptable.**	The geotechnical hazards associated with the Proposal have been assessed by Torlesse Ltd, including liquefaction, lateral spreading, slope instability, settlement and groundwater conditions. Torlesse concludes that, subject to the recommended engineering measures, the identified hazards present a low risk to the proposed development and adjoining land and infrastructure. The residual geotechnical risks are therefore considered acceptable. Flood hazards have been assessed by Envelope Engineering, using updated hydraulic modelling incorporating climate change projections to 2130. The Proposal includes substantial earthworks, reconfigured drainage networks and consolidated flood storage within the proposed wetland and flood management areas. The modelling identifies approximately 26,000m³ of flood storage during the 1% AEP event, with flood levels and flows generally maintained or reduced on surrounding land. The proposed residential and commercial areas will generally achieve an H1 flood hazard classification, with appropriate building levels and freeboard to manage residual flood risks. The proposed KCDC consent conditions require further modelling at the Engineering Approval stage to confirm the final design and address localised changes in flood levels. Overall, the technical assessments demonstrate that the Proposal can appropriately manage natural hazard risks, including residual risks and the effects of climate change, consistent with Objective O15.
OBJECTIVE O16 **Inappropriate use and development in high hazard areas is avoided.**	Torlesse's assessment identifies low to moderate existing geotechnical risks across the Site. Section 6.6 and Table 17 of the *Geotechnical Assessment Report* confirm that, following implementation of the recommended engineering measures, the residual risks associated with landslips, active faults and liquefaction (including lateral spreading) are low. Accordingly, the Proposal is not considered inappropriate from a geotechnical hazard perspective. The *Flood Risk Assessment* identifies existing high flood hazards within parts of the Site, particularly around the Wharemaukū Stream and drainage channels. The Proposal has been designed to concentrate higher flood hazards within the proposed wetland, swales and flood management areas, with residential and commercial development areas generally achieving an H1 flood hazard classification. The proposed earthworks, drainage infrastructure and additional flood storage will manage flood risk within the Site while generally maintaining or reducing flood levels on surrounding land. Further modelling at the Engineering Approval stage will confirm the final flood management arrangements, as required by the proposed KCDC consent conditions. Accordingly, the Proposal is not considered to represent inappropriate development in areas subject to natural hazards and is consistent with Objective O16.
POLICY P25: HIGH HAZARD AREAS Use and development, including hazard mitigation methods, in on or over high hazard areas shall be managed to ensure that: a) they have a functional need or operational requirement or there is no practicable alternative to be so located, and b) an overall increase in risk of social, environmental and economic harm is avoided, and c) the hazard risk and/or residual hazard risk to the development, assessed using a risk-based approach, is acceptable or as low as reasonably practicable, recognising that in some instances an increase in risk to the development may be appropriate, and	The geotechnical risks associated with the Proposal have been assessed by Torlesse using a risk-based approach. The assessment confirms that these risks can be appropriately managed through removal of unsuitable soils, engineered fill, specific foundation design and associated construction measures. Potential effects on adjoining land and infrastructure have also been considered, with the identified geotechnical hazards unlikely to be accelerated or worsened by the proposed works. The *Flood Risk Assessment* considers existing flood hazards and climate change projections to 2130. The Proposal incorporates earthworks, reconfigured drainage networks and consolidated flood storage to enable development while maintaining the floodplain's storage and conveyance functions. The modelling identifies approximately 26,000m³ of flood storage during the 1% AEP event, with flood levels and flows generally maintained or reduced on surrounding land. Higher flood hazards will be concentrated within the

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
d) the development does not cause or exacerbate hazard risk in other areas, and unless effects are avoided, remedied or mitigated in accordance with a hazard risk management strategy, and e) adverse effects on natural processes (coastal, riverine and lake processes) are avoided, remedied, or mitigated, and f) natural cycles of erosion and accretion and the potential for natural features to fluctuate in position over time, including movements due to climate change and sea level rise over at least the next 100 years, are taken into account.	proposed wetland and drainage corridors, while residential and commercial areas will generally achieve an H1 flood hazard classification. The proposed *KCDC Consent Conditions* require updated modelling at the Engineering Approval stage to confirm the final flood management arrangements and effects on surrounding land, including localised changes identified in the FRA. Overall, the Proposal is considered to appropriately manage natural hazard risks, including residual risks and effects on adjoining land, and is generally consistent with Policy P25.
POLICY P26: DIVERSION OF FLOOD WATERS IN A FLOODPLAIN The diversion of flood waters from any river or lake resulting from earthworks or the erection, placement or extension of a structure within stopbanks or through the creation of new stopbanks shall be managed to ensure: a) any increase in hazard risk or residual hazard risk in other areas as a result of the diversion is avoided or mitigated, and b) any adverse effects on natural processes are avoided, remedied, or mitigated, and c) natural cycles of erosion and accretion and the potential for natural features to fluctuate in position over time, including movements due to climate change over at least the next 100 years, are taken into account.	The Proposal involves substantial earthworks and changes to the existing floodplain, including the redistribution of floodwaters through the proposed drainage network and consolidated wetland and flood management areas adjoining the Wharemaukū Stream. The *Flood Risk Assessment* demonstrates that flood levels and flows are generally maintained or reduced on surrounding land. The proposed drainage corridors, swales and culverts will maintain flood conveyance, while the additional storage will assist in reducing peak flows along parts of the Wharemaukū Stream. The modelling incorporates climate change projections to 2130. The proposed *KCDC Consent Conditions* require further modelling at the Engineering Approval stage to confirm the final design and effects on surrounding land, including localised changes identified in the assessment. Overall, the proposed flood management arrangements are considered to appropriately manage the diversion of floodwaters without materially increasing flood risk on adjoining land. Subject to the proposed conditions, the Proposal is considered generally consistent with Policy P26.
POLICY P28: EFFECTS OF CLIMATE CHANGE Particular regard shall be given to the potential for climate change a) to threaten biodiversity, aquatic ecosystem health and mahinga kai, or b) to cause or exacerbate natural hazard events over at least the next 100 years that could adversely affect use and development including as a result of: c) coastal erosion and inundation (storm surge), and d) river and lake flooding and erosion, aggradation, decreased minimum flows, and e) stormwater ponding and impeded drainage, and f) relative sea level rise, using reliable scientific data for the Wellington region.	The potential effects of climate change have been considered through the *Flood Risk Assessment* and the ecological and hydrological assessments supporting the Proposal. The flood modelling incorporates climate change projections to 2130, including changes in rainfall and associated flood conditions. The Proposal responds to these risks through substantial earthworks, reconfigured drainage networks and consolidated flood storage within the proposed wetland and flood management areas. The modelling demonstrates that approximately 26,000m³ of flood storage will be provided during the 1% AEP event, with flood levels and flows generally maintained or reduced on surrounding land. The proposed wetland compensation complex, stormwater management measures and enhancement of the Wharemaukū Stream corridor also contribute to the management of freshwater environments and their ecological functions. Overall, the Proposal has had regard to the potential effects of climate change on flooding, drainage and freshwater environments over the next 100 years and is considered consistent with Policy P28.
POLICY P29: NATURAL BUFFERS Provide for the restoration or enhancement of natural features such as beaches, dunes or wetlands that buffer development from natural hazards and ensure the adverse effects of use and development on them are avoided, remedied, or mitigated.	The Proposal incorporates the establishment of an indigenous wetland complex adjoining the Wharemaukū Stream, which will provide both ecological restoration and flood management functions. The proposed wetland and secondary flood storage functions will accommodate floodwaters displaced by development elsewhere on the Site, with hydraulic modelling identifying that hydraulic neutrality can be achieved. The Proposal also includes riparian enhancement along the Wharemaukū Stream and an integrated network of swales, open spaces and indigenous planting, contributing to the restoration of natural features and their flood management functions. While the Proposal involves modification of existing dunes and reclamation of wetlands, these effects are addressed through the proposed ecological compensation, landscape restoration and management measures, as assessed elsewhere in this application. Overall, the Proposal provides for the restoration and enhancement of natural features that contribute to flood management and is considered generally consistent with Policy P29.
WATER QUALITY	

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
Objective O17 seeks that water quality is maintained or improved, with Objective O18 seeking that rivers and natural wetlands are suitable for contact recreation and Māori customary use.	
OBJECTIVE O17 **The quality of groundwater, water in surface water bodies, and the coastal marine area is maintained or improved.** OBJECTIVE O18 **Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use, including by:** **(a) maintaining water quality, or** **(b) improving water quality in:** **(i) significant contact recreation fresh water bodies and sites with significant mana whenua values identified in Schedule C and Ngā Taonga Nui a Kiwa identified in Schedule B to meet, as a minimum and within reasonable timeframes, the primary contact recreation objectives in Table 3.1, and** **(ii) coastal water and sites with significant mana whenua values identified in Schedule C and Ngā Taonga Nui a Kiwa identified in Schedule B to meet, as a minimum and within reasonable timeframes, the contact recreation objectives in Table 3.3, and** **(iii) all other rivers and lakes and natural wetlands to meet, as a minimum and within reasonable timeframes, the secondary contact recreation objectives in Table 3.2.**	The Proposal is generally consistent with Objectives O17 and O18. Potential effects on water quality will be managed during both the construction and operational phases of the development. During construction, the key risk to water quality arises from sediment generated by earthworks and works in proximity to watercourses. These effects will be managed through the proposed erosion and sediment control measures, including sediment treatment, inspections and monitoring in accordance with the proposed *GWRC Consent Conditions*. Following development, stormwater runoff from roads, parking areas, buildings and other impervious surfaces will be managed through the integrated stormwater system detailed in the *Stormwater Management Plan*. This incorporates rainwater storage, soakage where practicable and bioretention rain gardens to treat runoff before discharge to downstream receiving environments, including the Wharemaukū Stream. The plan identifies indicative contaminant removal efficiencies for appropriately designed bioretention rain gardens of 90% for zinc, copper and total suspended solids, 40% for total nitrogen and 60% for total phosphorus. These measures are intended to manage the contaminants associated with urban runoff, recognising that the development will change the nature of contaminant sources compared with the existing pastoral land use. The proposed GWRC consent conditions provide for the detailed design, implementation, monitoring and ongoing maintenance of relevant stormwater management measures. These requirements will assist in ensuring that the proposed treatment devices perform as intended and that potential effects on downstream receiving environments are appropriately managed. Overall, the *Stormwater Management Plan* and proposed consent conditions establish an appropriate framework for managing construction and operational water quality effects.
BIODIVERSITY, AQUATIC ECOSYSTEM HEALTH AND MAHINGA KAI	
Closely related to water quality, is aquatic ecosystem health and mahinga kai. Objective O19 seeks that biodiversity, aquatic ecosystem health and mahinga kai in freshwater bodies are safeguarded from a water quality and quantity perspective, encouraging restoration. Objective O21 seeks that vegetated riparian margins are stablished or managed to enhance water quality, aquatic ecosystem health, mahinga kai and indigenous biodiversity. Objective O22 seeks that the extent of natural wetlands is maintained or increased, their values are protected, and their condition is restored. Objective O23 seeks that fish passage is provided for, and Objective O24 is to maintain or improve trout habitat. These objectives are supported by policies. Policy P30 sets out how the adverse effects of use and development should be managed, including through hydrology, water quality and habitat restoration measures. Policy P31 sets out an effects management hierarchy for adverse effects on biodiversity, aquatic ecosystem health, and mahinga kai. Policy P32 seeks provision for fish passage. In terms of wetlands, Policy P34 outlines the value of natural wetlands and Policy P35 encourages the restoration of wetlands. Policy P45 seeks that protection of trout habitat shall have particular regard given to it.	
OBJECTIVE O19 **Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area are safeguarded such that:** **(a) Water quality, flows, water levels and aquatic and coastal habitats are managed to maintain biodiversity, aquatic ecosystem health and mahinga kai; and** **(b) Where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is improved over time to meet that objective.** **(c) Restoration of aquatic ecosystem health and mahinga kai is encouraged.** POLICY P30- BIODIVERSITY, AQUATIC ECOSYSTEM HEALTH AND MAHINGA KAI Manage the adverse effects of use and development on biodiversity, aquatic ecosystem health and mahinga kai to: Hydrology	The proposal is considered consistent with Objective O19 and Policy P30 for the following reasons: • The Wharemaukū Stream, which has moderate ecological value, will be retained in its existing alignment and naturalised. Direct effects through diversion or reclamation of the Stream have been avoided. • The Proposal will result in the loss of 5.33ha of existing wetlands. These wetlands are highly modified by their historic agricultural use, dominated by exotic vegetation and have low to moderate ecological values. Residual effects associated with their loss will be addressed through the creation and ecological enhancement of up to 5.44ha of wetland habitat, integrated with the Wharemaukū Stream riparian corridor and planted with appropriate native species. • Freshwater connectivity through the Site will generally be maintained, including connectivity of the Wharemaukū Stream with its upstream and downstream reaches. Culverts associated with stream crossings will be designed to provide for fish passage. • Potential effects on indigenous freshwater fauna will be managed through a Native Fish Recovery and Relocation Plan, including the capture and relocation of fish prior to works within affected aquatic habitats.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
(a) maintain or where practicable restore natural flow characteristics and hydrodynamic processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands, and Water quality (b) maintain or improve water quality including to assist with achieving objectives in Tables 3.4, 3.5, 3.6, 3.7 and 3.8 of Objective O25, and Aquatic habitat diversity and quality (c) restore aquatic habitat diversity and quality, including: (i) the form, frequency and pattern of pools, runs, and riffles in rivers, and (ii) the natural form of rivers, lakes, natural wetlands and the coastal marine area, and (d) where practicable restore the connections between fragmented aquatic habitats, and Critical habitat for indigenous aquatic species and indigenous birds (e) maintain or where practicable restore habitats that are important to the life cycle and survival of indigenous aquatic species and the habitats of indigenous birds in the coastal marine area, natural wetlands and the beds of lakes and rivers and their margins that are used for breeding, roosting, feeding, and migration, and Critical life cycle periods (f) avoid, minimise or remedy adverse effects on aquatic species at times which will most affect the breeding, spawning, and dispersal or migration of those species, including timing the activity, or the adverse effects of the activity, to avoid times of the year when adverse effects may be more significant, and Riparian habitats (g) maintain or where practicable restore riparian habitats, and Pests (h) avoid the introduction, and restrict the spread, of aquatic pest plants and animals.	• Riparian habitat will be substantially enhanced through native planting associated with the Wharemaukū Stream and proposed wetland system, creating a more contiguous freshwater and riparian habitat network than currently exists. • Potential sediment effects during construction will be managed through erosion and sediment control measures, while operational stormwater treatment will be addressed through the proposed stormwater management system. • Overall, the EcIA concludes that, following implementation of the effects management hierarchy, effects on the relevant ecological values are mostly a net gain. Accordingly, while the proposal will result in the loss and modification of existing freshwater habitats, the proposed restoration, wetland creation, riparian enhancement, fish management and maintenance of freshwater connectivity will appropriately manage those effects and provide for improved aquatic ecosystem health and biodiversity outcomes.
POLICY P31 - ADVERSE EFFECTS ON BIODIVERSITY, AQUATIC ECOSYSTEM HEALTH, AND MAHINGA KAI Adverse effects on biodiversity, aquatic ecosystem health and mahinga kai shall be managed by: (a) in the first instance, activities that risk causing adverse effects on the values of a Schedule F ecosystem or habitat, other than activities carried out in accordance with a wetland restoration management plan, shall avoid these ecosystems and habitats. If the ecosystem or habitat cannot be avoided, the adverse effects of activities shall be managed by (b) to (g) below. (b) avoiding adverse effects where practicable, and (c) where adverse effects cannot be avoided, minimising them where practicable, and (d) where adverse effects cannot be avoided and/or minimised, they are remedied, except as provided for in (a) to (g), and (e) where significant more than minor residual adverse effects cannot be avoided, minimised, or remedied, biodiversity offsetting is provided where possible remain, it is appropriate to consider the use of biodiversity offsets., and (f) if biodiversity offsetting of more than minor residual adverse effects is not possible, biodiversity compensation is provided, and (g) the activity itself is avoided if biodiversity compensation cannot be undertaken in a way that is appropriate as set out in Schedule G3, including Clause 2 of that Schedule. In relation to activities within the beds of lakes, rivers and natural wetlands, (e) to (g) only apply to activities which meet the exceptions in Policy P110.	The Proposal has been assessed against the effects management hierarchy set out in Policy P31. The Proposal avoids direct reclamation or diversion of the main Wharemaukū Stream channel, which will be retained generally within its existing alignment and subject to enhancement planting and associated restoration measures. However, the Proposal will result in the reclamation of approximately 5.33ha of existing wetlands, predominantly comprising exotic pastoral wetland habitats. The practicability of avoiding wetland loss has been considered in the context of the Site's physical constraints, proposed road network, earthworks, flood management requirements and the integrated development anticipated by the Metropolitan Centre Zone. While some individual wetlands could potentially be retained through changes to the development layout, the technical assessments identify wider implications for infrastructure, development configuration and the ongoing hydrological functioning of retained wetlands. Complete avoidance of wetland loss is therefore not considered practicable. Where effects cannot be avoided, the Proposal incorporates measures to minimise and manage adverse effects, including erosion and sediment controls, freshwater fish recovery and relocation, riparian enhancement and ecological management requirements. The *Ecological Impact Assessment* identifies residual adverse effects on wetlands that remain moderate to high following avoidance and mitigation. These effects are proposed to be addressed through biodiversity compensation involving the establishment of an indigenous wetland complex adjoining the Wharemaukū Stream. The proposed compensation has been assessed using a Biodiversity Compensation Model, which identifies a predicted net positive outcome of approximately 28.5% above the assessed impact. The proposed GWRC consent conditions provide for the detailed design, implementation, monitoring and ongoing management of the wetland compensation complex and associated ecological measures, including

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	adaptive management requirements intended to support the achievement of the predicted ecological outcomes.
OBJECTIVE O21 **Vegetated riparian margins are established, and maintained. or restored to enhance water quality, aquatic ecosystem health, mahinga kai and indigenous biodiversity of rivers, lakes, natural wetlands and the coastal marine area.** OBJECTIVE O23 **The passage of fish and kōura is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages or their habitats.** POLICY P32 - FISH PASSAGE The construction or creation of new barriers impeding the efficient and safe passage of fish and kōura species at all their life stages shall be avoided, except where this is required for the protection of indigenous fish and kōura populations. POLICY P33 - RESTORING FISH PASSAGE Remediation to provide for the efficient and safe passage of indigenous fish and kōura is promoted, and regard shall be had to requiring this when extending, altering or reconstructing instream structures, where this is appropriate for the management and protection of indigenous fish and kōura populations.	The Proposal is generally consistent with Objectives O21 and O23 and Policies P32 and P33. The Proposal includes enhancement of the Wharemaukū Stream corridor, including riparian planting and associated ecological restoration measures. These works are intended to improve riparian habitat, provide additional shading and habitat opportunities, and contribute to the ecological health of the Stream. The Wharemaukū Stream will be retained generally within its existing alignment, with the proposed works including culverts associated with the development's road network. These culverts will be designed to provide for fish passage in accordance with the NES-F, maintaining connectivity for indigenous freshwater species along the Stream. Fish passage will also be provided through the culvert beneath the road separating the two areas of the proposed wetland compensation complex. This will maintain aquatic connectivity between the wetland areas and provide opportunities for fish movement through the wider wetland system. The Proposal also includes the establishment of an indigenous wetland complex adjoining the Wharemaukū Stream, together with planting and ecological management measures intended to establish and maintain freshwater and riparian habitats. Construction-related effects on freshwater fauna will be managed through the proposed fish recovery and relocation measures. The proposed GWRC consent conditions provide for the detailed design of culverts, fish passage requirements, ecological management and monitoring, and the implementation and maintenance of riparian and wetland planting. Overall, the Proposal provides for the maintenance of fish passage through the proposed culverts and the establishment and enhancement of riparian and freshwater habitats.
OBJECTIVE O22 **The extent and significant values of natural wetlands are protected, and their condition is restored. Where the significant values relate to biodiversity, aquatic ecosystem health and mahinga kai, restoration is to a healthy functioning state as defined by Table 3.7.** POLICY P34 - VALUES OF WETLANDS Activities in and adjacent to natural wetlands shall be managed to maintain and, where appropriate, restore their condition and their values including: (a) as habitat for indigenous flora and fauna, and (b) for their significance to mana whenua, and (c) for their role in the hydrological cycle including flood protection, and (d) for nutrient attenuation and sediment trapping, and (e) as a fisheries resource, and (f) for recreation, and (g) for education and scientific research. POLICY P35 - RESTORATION OF WETLANDS The restoration of natural wetlands and the construction of artificial wetlands to meet the water quality, aquatic ecosystem health and mahinga kai objectives set out in Tables 3.7 and 3.8, to provide habitat for indigenous flora and fauna, and to carry out the physical and ecological functions of natural wetlands, and to provide for amenity values where this aligns with restoration appropriate to the area and wetland type shall be encouraged and supported.	The Proposal will result in the reclamation of approximately 5.33ha of existing natural wetlands, predominantly comprising exotic pastoral wetland habitats. As outlined in the *Ecological Impact Assessment*, the loss of these wetlands will result in residual adverse ecological effects assessed as moderate to high. The practicability of retaining the existing wetlands has been considered through the design process, having regard to the Site's physical constraints, proposed road network, earthworks, flood management requirements and the development anticipated by the Metropolitan Centre Zone. While some individual wetlands could potentially be retained, the technical assessments identify wider implications for infrastructure, development configuration and the ongoing hydrological functioning of retained wetlands. To address the residual ecological effects, the Proposal includes the establishment of an 5.44ha indigenous wetland compensation complex adjoining the Wharemaukū Stream. The complex will incorporate a range of wetland habitats, indigenous planting and connections between the two wetland areas, including provision for fish passage through the connecting culvert. The proposed compensation has been assessed using a Biodiversity Compensation Model, which identifies a predicted net positive ecological outcome of approximately 28.5% above the assessed impact. The proposed *GWRC Consent Conditions* provide for detailed wetland design, planting, ecological monitoring, maintenance and adaptive management to support the establishment and ongoing functioning of the wetland complex. The Proposal therefore supports the restoration and establishment of indigenous wetland habitats and their ecological and hydrological functions, consistent with the outcomes encouraged by Policy P35. However, the proposed compensation does not avoid the loss of existing natural wetlands.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	Overall, while the Proposal does not fully achieve the protection of existing wetland extent sought by Objective O22, the proposed compensation and associated management measures provide a means of addressing residual ecological effects and contributing to the wetland restoration outcomes sought by Policies P34 and P35.
POLICY P109: MANAGEMENT OF RIPARIAN MARGINS Maintain or restore water quality, aquatic ecosystem health, mahinga kai and natural character, and reduce the amount of contaminants entering surface water bodies, through the management of riparian margins including: a) the exclusion or restricted access of livestock likely to affect riparian margins or water quality, b) set-back distances from surface water bodies for some land use activities including earthworks, vegetation clearance, cultivation and break-feeding, c) encouraging the planting of appropriate riparian vegetation, and d) the control of pest plants and animals.	The Proposal is generally consistent with Policy P109. The Wharemaukū Stream will be retained generally within its existing alignment, with riparian planting and enhancement proposed along the stream corridor. Importantly, the proposed riparian planting is provided separately from the wetland compensation package and is not relied upon to address the residual ecological effects associated with the reclamation of existing wetlands. Rather, it forms part of the proposed enhancement of the Wharemaukū Stream corridor, intended to improve riparian habitat, provide shading, stabilise stream banks and assist in reducing sediment and contaminant inputs. The proposed works will also establish indigenous vegetation along the stream margins, replacing areas currently dominated by pastoral vegetation. The proposed Overall, the proposed riparian enhancement measures will contribute to improved water quality, aquatic ecosystem health and natural character along the Wharemaukū Stream.
POLICY P110 - LOSS OF EXTENT AND VALUES OF THE BEDS OF LAKES AND RIVERS, AND NATURAL WETLANDS The loss of extent and values of the beds of lakes and rivers and natural wetlands, including as a result of reclamation and drainage, shall be is avoided a) in a natural inland wetland (as defined in the NPS-FM): (i) the loss of extent or values arises from any of the following: 1. the customary harvest of food or resources undertaken in accordance with tikanga Māori, or 2. wetland maintenance, restoration, or biosecurity (as defined in the National Policy Statement for Freshwater Management 2020), or 3. scientific research, or 4. the sustainable harvest of sphagnum moss, or 5. the construction or maintenance of wetland utility structures, or 6. the maintenance or operation of specified infrastructure, or other infrastructure, or 7. natural hazard works, or (II) for specified infrastructure: 1. the activity, including any reclamation and drainage, is necessary for the construction or upgrade of specified infrastructure, and 2. the specified infrastructure will provide significant national or regional benefits, and 3. there is a functional need for the specified infrastructure in that location, and 4. the effects of the activity are managed through applying the effects management hierarchy (as defined in the National Policy Statement for Freshwater Management 2020 or (iii) for urban development: 1. the activity is necessary for the purpose of urban development that contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development 2022), and	Policy P110 requires the loss of extent and values of natural inland wetlands to be avoided unless one of the identified exceptions applies. In this case, the proposed wetland loss and associated reclamation are principally required to enable the proposed urban development and are therefore assessed under Policy P110(a)(iii). The Proposal will contribute to a well-functioning urban environment through the comprehensive development of Metropolitan Centre-zoned land for a significant mix of residential, commercial and retail activities, supported by transport connections, infrastructure and open space. The development will provide significant district and regional benefits and is located on land specifically identified and zoned for urban development. The practicability of avoiding wetland loss has been considered through an iterative multidisciplinary design process, as detailed in the supporting assessments prepared by Envelope Engineering and Urban Acumen. The technical assessments identify that alternative layouts involving greater wetland retention would have significant implications for the proposed road network, earthworks, flood management, servicing and development configuration. While individual wetlands could potentially be retained through changes to the layout, their retention would also need to account for the ongoing hydrological functioning of those wetlands within the developed Site. On this basis, there is no practicable alternative layout within the development area that would achieve the proposed comprehensive urban development while avoiding wetland loss, or that would result in lesser adverse effects on natural inland wetlands. Accordingly, the Proposal is considered to satisfy the practicability requirements of Policy P110(a)(iii)(4). The effects of wetland loss have been assessed against the effects management hierarchy, including consideration of avoidance and minimisation where practicable. The *Ecological Impact Assessment* identifies residual adverse effects on wetlands that are proposed to be addressed through biodiversity compensation involving the establishment of an indigenous wetland complex adjoining the Wharemaukū Stream. The Biodiversity Compensation Model identifies a predicted net positive ecological outcome of approximately 28.5% above the assessed impact. The proposed GWRC consent conditions provide for the detailed design, implementation, monitoring, maintenance and adaptive management of the compensation measures. Overall, the proposed wetland reclamation meets the urban development exception under Policy P110(a)(iii), with residual ecological effects addressed through the proposed wetland compensation package and associated GWRC consent conditions.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
2. the urban development will provide significant national, regional, or district benefits, and 3. the activity occurs on land identified for urban development in operative provisions of a regional or district plan, and the activity does not occur on land that is zoned in a district plan as general rural, rural production, or rural lifestyle, and 4. there is either no practicable alternative location for the activity within the area of the development, or every other practicable location in the area of the development would have equal or greater adverse effects on a natural inland wetland, and 5. the effects of the activity will be managed through applying the effects management hierarchy (as defined in the National Policy Statement for Freshwater Management 2020),	
SITES WITH SIGNIFICANT VALUES	
While there are no mapped sites in the NRP that identify any areas of significant indigenous biodiversity value, Policy P42 states that all natural wetlands in the Wellington Region are considered to be ecosystems and habitats with significant indigenous biodiversity values as they meet at least two of the criteria listed in Policy 23 of the Regional Policy Statement 2013 for identifying indigenous ecosystems and habitats with significant indigenous biodiversity values; being representativeness and rarity. Objective O28 requires ecosystems and habitats with significant indigenous biodiversity values to be protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state. Policy P44 sets out how effects on these sites should be managed, including through the maintenance and enhancement of ecological connections, the use of buffers around the sites, and avoidance of cumulative adverse effects on and the incremental loss of significant indigenous biodiversity values. Policy P46 requires wetland restoration management plans if any restoration activity will have more than minor adverse effects on natural inland wetlands.	
OBJECTIVE O28 **Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where Natural Resources Plan for the Wellington Region 59 appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.**	The proposal is considered consistent with Objective O28 and Policy P42 for the following reasons: • The ecological values of the Site have been assessed, with freshwater habitat values ranging from negligible to moderate. The existing wetlands are predominantly highly modified exotic pastoral wetlands. • Direct reclamation or diversion of the Wharemaukū Stream has been avoided, with the Stream retained and proposed to be naturalised and enhanced. • Where effects on freshwater and wetland habitats cannot be avoided, the effects management hierarchy has been applied. The loss of 5.33ha of existing wetlands will be addressed through the creation and enhancement of up to 5.40ha of wetland habitat integrated with the Wharemaukū Stream corridor. • The proposed wetland and riparian areas will be planted with appropriate indigenous species to establish a larger and more contiguous freshwater habitat and improve ecological function and biodiversity values. • Effects on indigenous fauna will be managed through specific measures, including native fish recovery and relocation, lizard management and avifauna management. • The proposed ecological management, monitoring and adaptive management measures will ensure that the wetland and riparian restoration outcomes are established and maintained over time. Overall, the Proposal applies the effects management hierarchy to protect and restore indigenous biodiversity values, with the Ecological Impact Assessment concluding that effects following implementation of the proposed management measures will predominantly result in a net ecological gain.
POLICY P42 ECOSYSTEMS AND HABITATS WITH SIGNIFICANT INDIGENOUS BIODIVERSITY VALUES Protect in accordance with Policy P31 and policies P38-P41 and, where appropriate, and restore the following ecosystems and habitats with significant indigenous biodiversity values: a) the rivers and lakes with significant indigenous ecosystems identified in Schedule F1 (rivers/lakes), and b) the habitats for indigenous birds identified in Schedule F2 (bird habitats), and c) significant natural wetlands, including the significant natural wetlands identified in Schedule F3 (identified significant natural wetlands), and d) the ecosystems and habitat-types with significant indigenous biodiversity values in the coastal marine area identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats).	

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
POLICY P43 EFFECTS ON THE SPAWNING AND MIGRATION OF INDIGENOUS FISH SPECIES Avoid more than minor adverse effects of activities on indigenous fish species known to be present in any water body identified in Schedule F1 (rivers/lakes) as habitat for indigenous fish species or Schedule F1b (inanga spawning habitats), during known spawning and migration times identified in Schedule F1a (fish spawning/migration). These activities may include the following: a) discharges of contaminants, including sediment, and b) disturbance of the bed or banks that would affect spawning habitat at peak times of the year, and c) (c) damming, diversion or taking of water which leads to loss of flow or which makes the river impassable to migrating indigenous fish.	The proposal is consistent with Policy P43. The Wharemaukū Stream is identified in Schedule F1 and supports indigenous fish species. The Stream will be retained in its existing alignment, with direct effects from reclamation or diversion avoided and naturalisation and riparian enhancement proposed. Works within and adjacent to freshwater habitats will be managed to minimise effects on indigenous fish, including through erosion and sediment controls, appropriate timing of works, fish passage provision at stream crossings, and implementation of a Native Fish Recovery and Relocation Plan. These measures will ensure that construction activities do not result in more than minor adverse effects on indigenous fish spawning or migration.
POLICY P44: MANAGING EFFECTS ON ECOSYSTEMS AND HABITATS WITH SIGNIFICANT INDIGENOUS BIODIVERSITY VALUES FROM ACTIVITIES OUTSIDE THESE ECOSYSTEMS AND HABITATS In order to protect the ecosystems and habitats with significant indigenous biodiversity values in accordance with Policy P42, particular regard shall be given to managing the adverse effects of use and development in areas outside of these ecosystems and habitats on physical, chemical and biological processes to: a) maintain ecological connections within and between these habitats, or b) provide for the enhancement of ecological connectivity between fragmented habitats through biodiversity offsets, and c) provide adequate buffers around ecosystems and habitats with significant indigenous biodiversity values, and d) avoid cumulative adverse effects on, and the incremental loss of significant indigenous biodiversity values.	The *Ecological Impact Assessment* does not identify any ecosystems or habitats with significant indigenous biodiversity values within the development area. The Project will nevertheless maintain and enhance ecological connectivity through the Site, particularly through restoration and indigenous planting along the Wharemaukū Stream corridor and the wider open space network. Accordingly, the proposal is consistent with Policy P44.
POLICY P47: PROTECTION AND RESTORATION OF SITES WITH SIGNIFICANT MANA WHENUA VALUES Sites with significant mana whenua values identified in Schedule C (mana whenua) shall be protected and restored by a mix of the following regulatory and non-regulatory methods: a) managing use and development through rules in the plan, and b) working in partnership with key stakeholders through: i. increasing landowner and community understanding of significant values within Schedule C sites, and ii. working with mana whenua, landowners, and other interested parties as appropriate, to develop and implement restoration programmes for Schedule C sites, and iii. the Wellington Regional Council and iwi authorities implementing kaupapa Maori monitoring of Schedule C sites.	The Wharemaukū Stream is identified in Schedule C as a site with significant mana whenua values. The Proposal retains the Stream generally within its existing alignment and includes restoration and enhancement measures, including indigenous riparian planting and improvements to freshwater habitat. The *interim Cultural Impact Assessment* prepared by Te Ātiawa a preference for greater naturalisation of the Wharemaukū Stream, including consideration of a more natural alignment and improved connections with the proposed wetland areas. As outlined in the Consultation Summary Report, further discussions have been undertaken regarding these matters, and the Applicant remains open to working with Te Ātiawa and the relevant technical specialists to consider opportunities for further naturalisation, having regard to the Stream's flood conveyance function and associated engineering constraints. The proposed GWRC consent conditions include the preparation of a Wharemaukū Stream Restoration Management Plan, providing a mechanism for further consideration of the detailed restoration measures in consultation with Te Ātiawa. The conditions also provide opportunities for mana whenua involvement in implementation and monitoring. Overall, the Proposal incorporates restoration measures consistent with the direction of Policy P47, together with a framework for further collaboration regarding the extent of naturalisation achievable. However, the extent of restoration remains a matter of continued discussion with Te Ātiawa, KCDC and GWRC.
POLICY P48: MANAGING ADVERSE EFFECTS ON SITES WITH SIGNIFICANT MANA WHENUA VALUES Sites with significant mana whenua values identified in Schedule C shall be protected and restored by managing use and development in the following manner: a) in the first instance, avoid locating activities within sites listed in Schedule C, b) require any more than minor adverse effects of activities on the significant mana whenua values of the site to be evaluated through a	The Wharemaukū Stream is identified in Schedule C as a site with significant mana whenua values. The Proposal retains the Stream generally within its existing alignment, avoiding the more substantial reclamation and realignment previously proposed. However, localised works within and adjoining the Stream remain necessary, including culvert installation and associated earthworks. The *interim Cultural Impact Assessment* prepared by Te Ātiawa ki Whakarongotai, identifies concerns regarding the proposed treatment of the Stream and seeks greater naturalisation, including consideration of a more natural alignment and improved connections with the proposed wetland areas.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
cultural impact assessment undertaken by the relevant mana whenua as identified in Schedule C, c) significant adverse effects of an activity on the significant values of the site shall be avoided, (d) other adverse effects shall be managed in accordance with tikanga and kaupapa Maori responding to recommendations in the cultural impact assessment to: (i) avoid more than minor adverse effects on the significant values of the site, and (ii) where more than minor adverse effects cannot be avoided, minimising them, and (iii) where more than minor adverse effects cannot be avoided and/or minimised, they are remedied, and d) where more than minor adverse effects on significant mana whenua values identified in Schedule C (mana whenua) cannot be avoided, minimised, or remedied, the activity is inappropriate. Offsetting of effects on sites with significant mana whenua values is inappropriate, except where provided for in Policy P49, and e) the relevant mana whenua as identified in Schedule C shall be considered to be an affected party under RMA s95E for all activities which require resource consent within a Schedule C site where the adverse effects are minor or more	Following further engagement, Te Ātiawa has provided a memorandum identifying a constructive way forward regarding the extent of naturalisation achievable. Te Ātiawa has also arranged a workshop during the last week of October 2026 with the Applicant, KCDC and GWRC to work through the proposed Stream enhancements. The Proposal includes riparian restoration, ecological enhancement and fish passage measures. The proposed GWRC consent conditions also provide for a Wharemaukū Stream Restoration Management Plan, ongoing monitoring of the Stream's water quality and ecological condition, and opportunities for Te Ātiawa involvement in the detailed design, implementation and monitoring of restoration measures. Overall, the Proposal seeks to avoid and minimise effects on the Wharemaukū Stream through its retention and proposed enhancement. The workshop and proposed consent conditions provide a framework for further collaboration, restoration and monitoring, although the extent of naturalisation and associated cultural effects is still being worked through.
POLICY P49: OFFSETTING RESIDUAL ADVERSE EFFECTS ON SITES OF SIGNIFICANCE TO MANA WHENUA Residual adverse effects that are not otherwise avoided, minimised or remedied in accordance with the management hierarchy in Policy P48 may be offset where the relevant mana whenua as identified in Schedule C: a) considers the offsetting of residual adverse effects is appropriate in the particular circumstances, and b) have: i. an offsetting policy in place that applies to the area and values to be affected by the proposed development, or ii. prepared a cultural impact assessment that includes specific direction for the offsetting of effects of the proposed activity on the site of significance, and iii. expressly confirms that the offset proposed is consistent with: 1. the offsetting policy in Policy P49(b)(i) (where applicable), and 2. the cultural impact assessment in Policy P49(b)(ii), and 3. the offsetting principles set out in Schedule G3. Where offsetting is proposed for a site of significance that is associated with multiple mana whenua, there must be an agreed position between all groups that offsetting is appropriate and that (b) has been met.	The Wharemaukū Stream is identified in Schedule C as a site of significance to mana whenua. The *interim Cultural Impact Assessment* prepared by Te Ātiawa identifies adverse effects on cultural values associated with the Proposal, including concerns regarding the extent of naturalisation and restoration of the Stream. The Proposal does not seek to offset these cultural effects under Policy P49. Rather, the Applicant has sought to avoid and minimise effects through retention of the Stream generally within its existing alignment, together with proposed riparian restoration, ecological enhancement and ongoing monitoring. Further opportunities to address the matters raised in the assessment are being considered through continued engagement with Te Ātiawa. While the Proposal includes biodiversity compensation for the loss of natural wetlands, this is intended to address residual ecological effects and is not relied upon as an offset for adverse effects on significant mana whenua values. Accordingly, no cultural offset is proposed under Policy P49, and the specific requirements of that policy are not triggered. The adverse effects on mana whenua values identified in the assessment remain subject to consideration under Policy P48, including the outcomes of ongoing engagement and further consideration of the proposed stream enhancements.
POLICY P52: PROTECTING NATURAL FEATURES AND LANDSCAPES FROM INAPPROPRIATE USE AND DEVELOPMENT To protect natural features and landscapes (including seascapes) of the coastal environment, rivers, lakes and their margins and natural wetlands and their values, from inappropriate use and development by: a) avoiding adverse effects of activities on the natural attributes and characteristics of outstanding natural features and landscapes in the coastal environment, and b) avoiding significant adverse effects of activities on the natural attributes and characteristics of natural features and landscapes in the coastal environment and avoid, remedy and mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment, and **c)** outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating adverse effects of activities on the natural attributes and characteristics of outstanding natural features and landscapes, provided that the values of the natural features or landscapes that contribute to its outstanding status are retained.	The *Landscape and Visual Impact Assessment* confirms that the Site is not within an identified Outstanding Natural Feature or Landscape and is located within a highly modified urban environment. Accordingly, the specific direction relating to the protection of outstanding natural features and landscapes is of limited relevance to the proposal.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
AIR QUALITY	
OBJECTIVE O32 **The adverse effects of odour, smoke and dust on amenity values and people's well-being are minimised.** POLICY P58: MANAGING AIR AMENITY Air quality amenity in urban, rural and the coastal marine areas shall be managed to minimise offensive or objectionable odour, smoke and dust, particulate matter, fumes, ash and visible emissions.	The proposal is consistent with Objective O32 and Policy P58. The principal potential air quality effect will arise from dust generated during the extensive earthworks and construction activities. Dust will be managed through standard construction dust suppression and erosion and sediment control measures, including appropriate site management and monitoring. These measures will minimise the potential for offensive or objectionable dust beyond the Site and associated effects on surrounding amenity and people's wellbeing. Once construction is complete, the proposed residential and commercial activities are not anticipated to generate significant ongoing odour, smoke, dust or other air quality effects.
DISCHARGES TO LAND AND WATER	
Objectives O36 and O37 seek to minimise the amount of runoff and contaminants (including sediment) from entering water. Greater detail is provided through Policies P65 and P66. Policy P98 sets out how discharges to land shall be managed, and Policy P69 promotes discharges to land over water if a discharge to water would have adverse effects on aquatic ecosystem health, mahinga kai, contact recreation or Māori customary use. Policies P78, P79 and P80 manage point source discharges.	
OBJECTIVE O34 **The adverse effects on soil and water from land use activities are minimised, including to assist with achieving the outcomes and indicators of desired environmental states for water in Tables 3.1 to 3.8.**	The proposal is consistent with Objective O34. The earthworks required to develop the Site have the potential to generate sediment and affect downstream receiving waters. These effects will be minimised through erosion and sediment control measures, including staged earthworks, treatment of sediment-laden runoff and monitoring during construction. Following development, stormwater will be collected and treated through the proposed stormwater management system, while enhancement of the Wharemaukū Stream corridor and establishment of the proposed wetland will further assist in protecting freshwater values.
OBJECTIVE O37 **The amount of sediment-laden runoff entering water is reduced minimised, including to assist with achieving the outcomes and indicators of desired environmental states for water in Tables 3.1 to 3.8.** OBJECTIVE O38 **The adverse quality and quantity effects of stormwater discharges from the stormwater networks and urban land uses are improved over time.**	The Proposal is considered consistent with Objectives O37 and O38. During construction, sediment-laden runoff associated with the proposed earthworks will be minimised through erosion and sediment control measures, including staged earthworks, runoff treatment and monitoring, secured through the proposed consent conditions. Following development, stormwater will be managed through an integrated system incorporating water sensitive urban design measures, as detailed in the *Stormwater Management Plan.* The proposed treatment approach includes streetscape bioretention rain gardens to treat road runoff, passive soakage where practicable, and restrictions on contaminant-generating building materials. The assessment identifies that bioretention rain gardens designed in accordance with Wellington Water guidelines are expected to achieve indicative removal efficiencies of 90% for total suspended solids, zinc and copper, 40% for total nitrogen and 60% for total phosphorus. These measures will assist in reducing sediment and other contaminants entering the Wharemaukū Stream and downstream receiving environment. In terms of stormwater quantity, the assessment demonstrates that hydraulic neutrality can be achieved for the 2-, 5-, 10- and 100-year rainfall events through the proposed attenuation and soakage measures. The final configuration and sizing of stormwater devices will be confirmed through detailed design, subject to achieving the required performance standards and proposed consent conditions. Overall, the proposed construction-phase controls, stormwater treatment and attenuation measures provide an appropriate approach to minimising sediment-laden runoff and managing the water quality and quantity effects of urban development.
POLICY P65 - NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT REQUIREMENTS FOR DISCHARGE PERMITS When considering any application for a discharge consent the consent authority shall have regard to the following matters:	The Proposal is consistent with Policy P65. Potential effects associated with construction-phase sediment discharges will be minimised through erosion and sediment control measures, including treatment of sediment-laden runoff and monitoring. Operational stormwater from roads, car parking and other impervious areas will be collected and treated through the proposed stormwater management system prior to discharge. The Stormwater Management Plan will confirm the

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
(a) the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water, and (b) the extent to which it is feasible and dependable that any more than minor adverse effects on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided, and (c) the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their contact with fresh water, and (d) the extent to which it is feasible and dependable that any more than minor adverse effects on the health of people and communities as affected by their contact with fresh water resulting from the discharge would be avoided	detailed treatment measures to manage contaminants and protect the life-supporting capacity and recreational values of receiving waters, including the Wharemaukū Stream. Together with the proposed conditions of consent, these measures will ensure that adverse effects associated with construction and operational discharges are appropriately managed.
POLICY P66 - MINIMISING DISCHARGES TO WATER OR LAND Discharges of contaminants to water or land will be minimised through the following hierarchy: (a) avoiding the production of the contaminant, (b) reducing the amount of contaminants, including by reusing, recovering or recycling contaminants, (c) minimising the volume or amount of the discharge, (d) discharging to land is promoted over discharging direct to water, including using land-based treatment, constructed wetlands or other systems to treat contaminants prior to discharge.	The proposal is consistent with Policy P66. During construction, erosion and sediment control measures will minimise the generation and discharge of sediment from the Site. Operational stormwater will be managed through an integrated stormwater management system incorporating treatment and attenuation prior to discharge. The proposed wetland and flood storage areas will also contribute to the management and treatment of stormwater across the Site. The detailed treatment train and measures for minimising contaminants and discharge volumes will be confirmed through the *Stormwater Management Plan*. Overall, the Proposal adopts an integrated approach to minimising and treating stormwater discharges before they enter the receiving environment.
POLICY P83 - MINIMISING ADVERSE EFFECTS OF STORMWATER DISCHARGES The adverse effects of stormwater discharges shall be minimised, including by: (a) using good management practice, and (b) taking a source control and treatment train approach to new activities and land uses, and (c) implementing water sensitive urban design in new subdivision and development, and (d) progressively improving existing stormwater, wastewater, road and other public infrastructure, including during routine maintenance and upgrade, and (e) managing localised adverse effects, including by addressing particular attributes appropriate to the receiving environment. POLICY P84 - MANAGING LAND USE IMPACTS ON STORMWATER Land use, subdivision and development, including stormwater discharges, shall be managed so that runoff volumes and peak flows: (a) avoid or minimise scour and erosion of stream beds, banks and coastal margins, and (b) do not increase cause new or exacerbate existing risk to human health or safety, or increase exacerbate the risk of inundation, erosion or damage to property or infrastructure, including by retaining, as far as practicable, pre-development hydrological conditions hydrographs and overland flow paths in new subdivision and development.	The NRP defines WSUD as: *"The integration of planning, engineering design and water management to mimic or restore natural hydrological processes in order to address the quantitative and qualitative impacts of land use and development on land, water and biodiversity, and the community's aesthetic and recreational enjoyment of waterways and the coast. Water sensitive urban design manages stormwater at its source as one of the tools to control runoff and water quality. The terms of low impact design, low impact urban design and water sensitive design are often used synonymously with water sensitive urban design."* Essentially, water sensitive urban design applies a set of principles to land development to reduce or minimise negative effects on the receiving environment. The Proposal is considered consistent with Policies P83 and P84. The *Stormwater Management Plan* outlines an integrated stormwater management approach incorporating water sensitive urban design, source control, stormwater treatment and attenuation measures to manage the quality and quantity of runoff generated by the development. In relation to Policy P83, the proposed stormwater management system incorporates the following measures: • Streetscape bioretention rain gardens will provide treatment of runoff from the proposed road network. Based on Wellington Water design guidelines, the plan identifies indicative removal efficiencies of 90% for total suspended solids, zinc and copper, 40% for total nitrogen and 60% for total phosphorus. • Restrictions on contaminant-generating building materials will assist in reducing the generation of contaminants at source. • Passive soakage will be incorporated where practicable to manage runoff volumes and support groundwater recharge. Rainwater storage will also be provided for residential development, with the final arrangements confirmed through detailed design. • The proposed stormwater system will collect and manage runoff from the development, with treatment provided through the proposed bioretention devices before discharge to the receiving environment. • The final design, construction, maintenance and monitoring of stormwater infrastructure will be subject to the proposed consent conditions and relevant engineering approval processes.

TABLE 4: REGIONAL PLAN (NRP) OBJECTIVES AND POLICIES	
PROVISION	COMMENT
	In relation to Policy P84, the SMP includes hydrological modelling demonstrating that hydraulic neutrality can be achieved for the 2-, 5-, 10- and 100-year rainfall events through the proposed attenuation and soakage measures. This will assist in managing changes to peak flows and avoiding increased erosion, scour and downstream flood risk associated with the development. The final location, sizing and configuration of soakage devices will be confirmed through detailed design following site-specific soakage testing. Where soakage is not reasonably practicable, alternative attenuation measures may be adopted, provided the required hydraulic neutrality outcomes are achieved. The proposed stormwater network will also accommodate overland flow paths and integrate with the wider flood management system. Overall, the plan demonstrates that the Proposal incorporates appropriate source control, treatment and attenuation measures to manage the effects of urban stormwater discharges.
TAKING, USING, DAMMING AND DIVERTING WATER	
OBJECTIVE O43 **The efficient allocation and efficient use of water is improved and maximised through time including through water harvesting.** **POLICY P132: TAKING OF GROUNDWATER OR GROUND DISTURBANCE** The taking of groundwater or ground disturbance shall not result in cross contamination between aquifers or waterbearing layers that results in, or may result in, adverse effects on water quality. **POLICY P133: SITE DEWATERING** Localised land subsidence resulting from dewatering that affects structures shall be avoided and any more than minor adverse effects of dewatering on the following shall be avoided, remedied or mitigated: a) the ecosystem functioning of connected water bodies, and b) the reliability of supply for existing surface and ground water users, and c) the quality of surface or groundwater, and d) the contamination of land and water.	The Proposal is consistent with Objective O43 and Policies P132 and P133. The proposed groundwater take is temporary and limited to the use of a bore during construction of the proposal. The bore and associated groundwater take will be appropriately designed and managed to ensure efficient use of the water resource and to avoid cross-contamination between aquifers or water-bearing layers. The temporary take is not anticipated to result in adverse effects on groundwater quality, connected water bodies, existing water users or land stability. Overall, the proposed construction water take is consistent with these provisions.
POLICY P137: BORES Bores, including new bores, shall: a) be sited to ensure adequate separation from existing bores, avoid an over-concentration of bores in a particular area (except where intensive investigation is required on a site for geotechnical, contamination or other investigative purposes), and to minimise adverse effects on the reliability of supply from properly constructed, efficient and fully functioning existing bores, and b) be constructed, and bore logs and other records be prepared, in accordance with the NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock, and c) be used in a manner that prevents: (i) contaminants from entering the bore from the land surface, and (ii) the waste of water.	The Proposal is consistent with Policy P137. The proposed bore will be used temporarily to provide water during construction and will be appropriately located and constructed in accordance with the relevant standards. The bore will be managed to prevent contaminants entering from the land surface and to avoid the unnecessary waste of groundwater. On this basis, adverse effects on groundwater and existing bore users are not anticipated.

5. NATIONAL ENVIRONMENTAL STANDARD FOR FRESHWATER REGULATIONS

TABLE 5: NES-F ASSESSMENT

REGULATION	COMMENT
REGULATION 38 RESTORATION, WETLAND MAINTENANCE, AND BIOSECURITY OF NATURAL INLAND WETLANDS (PERMITTED)	
(1) Vegetation clearance within, or within a 10 m setback from, a natural inland wetland is a permitted activity if it— (a) is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) complies with the conditions.	Applies but conditions not complied with. Refer assessment below.
(2) Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland is a permitted activity if it— (a) is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) complies with the conditions.	Applies but conditions not complied with. Refer assessment below.
(3) The taking, use, damming, diversion, or discharge of water within, or within a 100 m setback from, a natural inland wetland is a permitted activity if— (a) the activity is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) there is a hydrological connection between the taking, use, damming, diversion, or discharge and the wetland; and (c) the taking, use, damming, diversion, or discharge will change, or is likely to change, the water level range or hydrological function of the wetland; and (d) the activity complies with the conditions.	Applies but conditions not complied with. Refer assessment below.
CONDITIONS	
(4) The conditions are that—	
(a) the activity must comply with the general conditions on natural inland wetland activities in regulation 55; and	**Does not comply.** Refer assessment below.
(b) if the activity is vegetation clearance, earthworks, or land disturbance, the activity must not occur over more than 500 m2 or 10% of the area of the natural inland wetland, whichever is smaller; and	**Does not comply.** The works exceed the area and percentage restrictions.
(c) if the activity is a discharge of water, it must not be a restricted discretionary activity as described in regulation 39(3A).	**Does not comply.** The discharge is a restricted discretionary activity.
However, the condition in subclause (4)(b) does not apply if—	
(a) the earthworks or land disturbance is for planting for restoration or wetland maintenance purposes; or	**Complies**
(b) the vegetation clearance, the earthworks, or the land disturbance is for clearance of exotic vegetation for biosecurity purposes; or	**Complies**
(c) the vegetation clearance, the earthworks, or the land disturbance is for clearance of indigenous vegetation that is demonstrably necessary for biosecurity purposes; or	**Complies**
(d) the vegetation clearance, the earthworks, or the land disturbance is for clearance of exotic vegetation, using hand-held tools, for restoration or wetland maintenance; or	**Does not comply** Complies. A draft restoration plan is provided with the application.
(e) the vegetation clearance, the earthworks, or the land disturbance is for clearance of exotic vegetation (other than clearance to which paragraph (d) applies) for restoration or wetland maintenance that is undertaken in accordance with— (i) a restoration plan; or (ii) a certified freshwater farm plan.	
GENERAL CONDITIONS ON NATURAL INLAND WETLAND ACTIVITES	
GENERAL CONDITIONS: WATER QUALITY AND MOVEMENT	
(a) the activity must not result in the discharge of a contaminant if the receiving environment includes any natural inland wetland in which the contaminant, after reasonable mixing, causes, or may cause, 1 or more of the following effects:	**Will comply** Discharges to the proposed wetlands will be minimised and will largely be isolated to sediment

TABLE 5: NES-F ASSESSMENT	
REGULATION	COMMENT
(i) the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials: (ii) a conspicuous change in colour or visual clarity: (iii) an emission of objectionable odour: (iv) the contamination of freshwater to the extent that it is not suitable for farm animals to drink: (v) adverse effects on aquatic life that are more than minor; and	laden water (if there is a ESC failure or wet-weather overflow) and treated stormwater. Measure have been included in the Proposal to ensure compliance with this standard.
(b) the activity must not increase the level of flood waters that would, in any flood event (regardless of probability), inundate all or any part of the 1% AEP floodplain (but see subclause (4)); and 1% AEP floodplain means the area that would be inundated in a flood event of a size that has a 1% or greater probability of occurring in any one year. *55(4) Subclause (3)(b) does not apply if the person undertaking the activity—* *(a) owns or controls the only land or structures that would be affected by a flood in all or any part of the 1% AEP floodplain; or* *(b) has—* *(i) obtained written consent to undertaking the activity from each person who owns or controls the land or structures that would be affected by a flood in all or part of the 1% AEP floodplain, after informing them of the expected increase in the level of flood waters; and* *(ii) satisfied the relevant regional council that they have complied with subparagraph (i).*	Not applicable The clause does not apply as the Applicants the land that will be affected by the flooding. This land will then be vested with PCC after the works are complete.
(c) the activity must not alter the natural movement of water into, within, or from any natural inland wetland (but see subclause (5)); and (d) the activity must not involve taking or discharging water to or from any natural inland wetland (but see subclause (5)); and	Will not comply As further described in the Hydrology Assessment, in some areas the natural movement of water into a wetland will be altered.
(e) debris and sediment must not be placed— (i) within a setback of 10 m from any natural inland wetland; or (ii) in a position where it may enter any natural inland wetland.	Will not comply Earthworks will occur within 10m of a wetland and therefore, technically this standard is not complied with.
GENERAL CONDITION: EARTH STABILITY AND DRAINAGE	
(7) The general condition relating to earth stability and drainage is that the activity must not create or contribute to— (a) the instability or subsidence of a slope or another land surface; or (b) the erosion of the bed or bank of any natural inland wetland; or (c) a change in the points at which water flows into or out of any natural inland wetland; or (d) a constriction on the flow of water within, into, or out of any natural inland wetland; or (e) the flooding or overland flow of water within, or flowing into or out of, any natural inland wetland.	Designed to comply The proposed works, including the measures outlined in the ECMP seek to minimise the risks identified in this standard.
GENERAL CONDITION: EARTHWORKS, LAND DISTURBANCE AND VEGETATION CLEARANCE	
(8) The general conditions on earthworks, land disturbance, and vegetation clearance are as follows: (a) during and after the activity, erosion and sediment control measures must be applied and maintained at the site of the activity to minimise adverse effects of sediment on natural inland wetlands; and (b) the measures must include stabilising or containing soil that is exposed or disturbed by the activity as soon as practicable after the activity ends; and (c) the measures referred to in paragraph (b) must remain in place until vegetation covers more than 80% of the site; and d) if the activity is vegetation clearance, it must not result in earth remaining bare for longer than 3 months.	Designed to comply The measures outlined in the ECMP adhere to these requirements.
GENERAL CONDITIONS: VEGETATION AND BIRD AND FISH HABITATS	

TABLE 5: NES-F ASSESSMENT	
REGULATION	COMMENT
9) The general conditions relating to vegetation and bird and fish habitats are as follows: (a) only indigenous species that are appropriate to a natural inland wetland (given the location and type of the natural inland wetland) may be planted in it; and (b) the activity must not result in the smothering of indigenous vegetation by debris and sediment; and (c) the activity must not disturb the roosting or nesting of indigenous birds during their breeding season; and (d) the activity must not disturb an area that is listed in a regional plan or water conservation order as a habitat for threatened indigenous fish; and (e) the activity must not, during a spawning season, disturb an area that is listed in a regional plan or water conservation order as a fish spawning area.	**Designed to comply** Measures included in the ECMP and wetland restoration plans will ensure that this condition is complied with.
GENERAL CONDITION: HISTORIC HERITAGE	
(10) The general condition relating to historic heritage is that the activity must not destroy, damage, or modify a site that is protected by an enactment because of the site's historic heritage (including, to avoid doubt, because of its significance to Māori), except in accordance with that enactment. (11) In subclause (10), enactment includes any kind of instrument made under an enactment.	**Not applicable** There are no areas within the Site that are protected by an enactment. Notwithstanding, iwi monitoring will be conducted for wetland works.
GENERAL CONDITIONS: MACHINERY, VEHICLES, EQUIPMENT, AND CONSTRUCTION MATERIALS	
(12) The general conditions on the use of vehicles, machinery, equipment, and materials are as follows: (a) machinery, vehicles, and equipment used for the activity must be cleaned before entering any natural inland wetland (to avoid introducing pests, unwanted organisms, or exotic plants); and (b) machinery that is used for the activity must sit outside a natural inland wetland, unless it is necessary for the machinery to enter the natural inland wetland to achieve the purpose of the activity; and (c) if machinery or vehicles enter any natural inland wetland, they must be modified or supported to prevent them from damaging the natural inland wetland (for example, by widening the tracks of track-driven vehicles or using platforms for machinery to sit on); and (d) the mixing of construction materials, and the refuelling and maintenance of vehicles, machinery, and equipment, must be done outside a 10 m setback from any natural inland wetland.	**Will comply** These measures are included in the ECMP and the contractor will be required to comply with them.
GENERAL CONDITION: MISCELLANEOUS	
(13) The other general conditions are as follows: (a) the activity must be undertaken only to the extent necessary to achieve its purpose; and (b) the activity must not involve the use of fire or explosives; and (c) if there is existing public access to a natural inland wetland, the activity must not prevent the public from continuing to access the natural inland wetland (unless that is required to protect the health and safety of the public or the persons undertaking the activity); and (d) no later than 5 days after the activity ends,— (i) debris, materials, and equipment relating to the activity must be removed from the site; and (ii) the site must be free from litter.	**Will comply** The proposed works will comply with this condition. It is noted that there is currently no public access to the wetlands within the Site.
REGULATION 39 - RESTORATION, WETLAND MAINTENANCE, AND BIOSECURITY OF NATURAL INLAND WETLANDS (RESTRICTED DISCRETIONARY	
(1) Vegetation clearance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it— (a) is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) does not comply with any of the conditions in regulation 38(4).	**Applies** **Restricted Discretionary Activity** consent sought under Regulation 39(1)
(2) Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it—	**Applies**

TABLE 5: NES-F ASSESSMENT	
REGULATION	COMMENT
(a) is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) does not comply with any of the conditions in regulation 38(4).	**Restricted Discretionary Activity** consent sought under Regulation 39(2)
(3) The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland is a restricted discretionary activity if— (a) the activity is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) there is a hydrological connection between the taking, use, damming, or diversion and the wetland; and (c) the taking, use, damming, or diversion will change, or is likely to change, the water level range or hydrological function of the wetland; and (d) the activity does not comply with the condition in regulation 38(4)(a).	**Applies** **Restricted Discretionary Activity** consent sought under Regulation 39(3)
(3A) The discharge of water into water within, or within a 100 m setback from, a natural inland wetland is a restricted discretionary activity if— (a) the discharge is for the purpose of natural inland wetland restoration, wetland maintenance, or biosecurity; and (b) there is a hydrological connection between the discharge and the wetland; and (c) the discharge will enter the wetland; and (d) the discharge will change, or is likely to change, the water level range or hydrological function of the wetland; and (e) the discharge does not comply with the condition in regulation 38(4)(a).	**Applies** **Restricted Discretionary Activity** consent sought under Regulation 39(3A)
REGULATION 45C URBAN DEVELOPMENT *Refer assessment in the application that confirms that the proposed urban development satisfies Policy NPS-UD and therefore, based on GWRC's interpretation, the proposal can utilise this regulation.*	
(1) Vegetation clearance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it is for the purpose of constructing urban development.	**Applies.** **Restricted Discretionary consent** sought under Regulation 45C(1)
(2) Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it is for the purpose of constructing urban development.	**Applies.** **Restricted Discretionary consent** sought under Regulation 45C(2)
(3) Earthworks or land disturbance outside a 10 m, but within a 100 m, setback from a natural inland wetland is a restricted discretionary activity if it— (a) is for the purpose of constructing urban development; and (b) results in, or is likely to result in, the complete or partial drainage of all or part of the w wetland.	**Applies.** **Restricted Discretionary consent** sought under Regulation 45C(3)
(4) The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland is a restricted discretionary activity if— (a) the activity is for the purpose of constructing urban development; and (b) there is a hydrological connection between the taking, use, damming, or diversion and the wetland; and (c) the taking, use, damming, or diversion will change, or is likely to change, the water level range or hydrological function of the wetland.	**Applies.** **Restricted Discretionary consent** sought under Regulation 45C(4)
(5) The discharge of water into water within, or within a 100 m setback from, a natural inland wetland is a restricted discretionary activity if— (a) the discharge is for the purpose of constructing urban development; and (b) there is a hydrological connection between the discharge and the wetland; and (c) the discharge will enter the wetland; and (d) the discharge will change, or is likely to change, the water level range or hydrological function of the wetland.	**Applies.** **Restricted Discretionary** consent sought under Regulation 45C(5)
REGULATION 57: REGULATION OF RIVERS	
1) Reclamation of the bed of any river is a discretionary activity.	**Applies** **Discretionary Activity** consent sought under Regulation 57.

TABLE 5: NES-F ASSESSMENT	
REGULATION	COMMENT
REGULATION 70: CULVERTS (PERMITTED)	
1) The placement, use, alteration, extension, or reconstruction of a culvert in, on, over, or under the bed of any river or connected area is a permitted activity if it complies with the conditions.	**Applies** Compliance outlined below.
CONDITIONS	
a) the culvert must provide for the same passage of fish upstream and downstream as would exist without the culvert, except as required to carry out the works to place, alter, extend, or reconstruct the culvert; and	**Will comply** The *Stormwater Management Plan* identifies that Culverts A and J are located within watercourses subject to fish passage requirements. Both culverts are proposed to have a minimum embedment of 25%, with final inlet and outlet arrangements, bed substrate and fish passage provisions to be confirmed through detailed design. The proposed consent conditions require compliance with the relevant NES-F fish passage requirements. On this basis, both culverts are considered capable of complying, subject to detailed design.
b) the culvert must be laid parallel to the slope of the bed of the river or connected area; and	**Will comply** The *Stormwater Management Plan* assesses both Culverts A and J as complying with the requirement for culvert alignment and gradient to match the adjoining watercourse. This will be confirmed through detailed design.
c) the mean cross-sectional water velocity in the culvert must be no greater than that in all immediately adjoining river reaches; and	**May not comply** Compliance with this requirement will be demonstrated through detailed hydraulic design.
d) the culvert's width where it intersects with the bed of the river or connected area (s) and the width of the bed at that location (w), both measured in metres, must compare as follows: I) where w ≤ 3, s ≥ 1.3 × w: II) where w > 3, s ≥ (1.2 × w) + 0.6; and	
e) the culvert must be open-bottomed or its invert must be placed so that at least 25% of the culvert's diameter is below the level of the bed; and	**Will comply**
f) the bed substrate must be present over the full length of the culvert and stable at the flow rate at or below which the water flows for 80% of the time; and	**Will comply**
g) the culvert provides for continuity of geomorphic processes (such as the movement of sediment and debris)	**Will comply**
REGULATION 71: CULVERTS (DISCRETIONARY)	
(1) The placement, use, alteration, extension, or reconstruction of a culvert in, on, over, or under the bed of a river is a discretionary activity if it does not comply with any of the conditions in regulation 70(2). Conditions required in resource consent 2) A resource consent granted for the discretionary activity must impose the conditions required by— (a) regulations 62 and 63 (information about structures and passage of fish and about culverts), unless the activity is use; and (b) regulation 69 (monitoring and maintenance).	As the proposed culvert may infringe clause c) and d) in Regulation 70(2), **Discretionary Activity** resource consent is required under Regulation 71.
REGULATION 62	
Clause 1 of Regulation 62 stipulates that this regulation applies to any activity that includes, among other things, the placement, alteration, extension, or reconstruction of a culvert in, on, over, or under the bed of any river or connected area. Clause 2 of Regulation 62 stipulates that the information stipulated in this regulation must be collected and provided to the relevant regional council, together with the time and date of its collection, within 20 working days after the activity (being culvert installation) is finished. Clause 3 of Regulation 62 sets out the following information that is required to be provided for activities covered by the regulation	The *Draft Consent Conditions* provided with the application includes a condition requiring the submission of the above information to GWRC 20 workings days after the culvert works have been completed.

TABLE 5: NES-F ASSESSMENT	
REGULATION	COMMENT
REGULATION 63	
Regulation 63 sets out the information requirements specifically for culvert activities. Clause 2) sets out that the information specified in this regulation must be collected and provided to the relevant regional council, together with the time and date of its collection, within 20 working days after the activity is finished.	
Clause 3 of Regulation 63 sets out the following information that is required: The information is— (a) the culvert's asset identification number, if known: (b) whether the culvert's ownership is— (i) held by the Crown (for example, the Department of Conservation), a regional council, a territorial authority, the New Zealand Transport Agency, or KiwiRail Holdings Limited; or (ii) held publicly by another person or organisation; or (iii) held privately; or (iv) unknown: (c) the number of barrels that make up the culvert: (d) the culvert's shape: (e) the culvert's length: (f) the culvert's diameter or its width and height: (g) the height of the drop (if any) from the culvert's outlet: (h) the length of the undercut or erosion (if any) from the culvert's outlet: (i) the material from which the culvert is made: (j) the mean depth of the water through the culvert: (k) the mean water velocity in the culvert: (l) whether there are low-velocity zones downstream of the culvert: (m) the type of bed substrate that is in most of the culvert: (n) whether there are any remediation features (for example, baffles or spat rope) in the culvert: (o) whether the culvert has wetted margins: (p) the slope of the culvert: (q) the alignment of the culvert: (r) the numbers of each other type of structure to which this subpart applies, or of wingwalls or screens, on the culvert: (s) if there is any apron or ramp on the culvert, the information required by regulation 68 for each of them.	The *Draft Consent Conditions* provided with the application includes a condition requiring the submission of the above information to GWRC 20 workings days after the culvert works have been completed.
REGULATION 69	
1. Under Regulation 69, a resource consent granted for, among other things, the placement, use, alteration, extension, or reconstruction of a culvert requires the imposition of conditions that - (a) require monitoring and maintenance of the structure that is sufficient to ensure that its provision for the passage of fish does not reduce over its lifetime; and (b) require a plan for that monitoring and maintenance that includes— (i) how the monitoring and maintenance will be done; and (ii) the steps to be taken to avoid any adverse effects on the passage of fish; and (iii) the steps to be taken to ensure that the structure's provision for the passage of fish does not reduce over its lifetime; and (iv) how often, as specified by the consent authority, the information must be provided under paragraph (c) (for the purposes of reassessing the structure's effect on the passage of fish); and (v) a process for providing that information; and	The *Draft Consent Conditions* provided with the application includes a condition satisfying the above requirement.

6. REGIONAL POLICY STATEMENT FOR THE WE OBJECTIVES AND POLICIES

Given the operative Porirua City District Plan and Natural Resources Plan have been given effect to after this Regional Policy Statement was operative, it is considered that all matters that are identified as a requirement of a District or Regional Plan have been adequately addressed in the relevant plan. In the assessment below, only consideration for those policies that are labelled as 'consideration' or 'non-regulatory' have been assessed.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025

PROVISION	COMMENT
Objective A **Integrated management of the region's natural and physical resources:** **a) is guided by Te Ao Māori; and** **b) incorporates mātauranga Māori in partnership with mana whenua / tangata whenua; and** **c) recognises and provides for ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and** **d) recognises and provides for the relationship of mana whenua / tangata whenua with te taiao and protects and enhances mana whenua / tangata whenua values, in particular mahinga kai; and** **e) is informed by the input of communities; and** **f) protects and enhances the life-supporting capacity of ecosystems; and** **g) recognises the dependence of humans on a healthy natural environment; and** **h) recognises the role of the resource management and planning system in reducing gross greenhouse gas emissions; and** **i) recognises the role of both natural and physical resources, including highly productive land and regionally significant infrastructure, in providing for well-functioning urban and rural areas and** **j) recognises the benefits of protecting and utilising the region's significant mineral resources; and** k) **responds effectively to the current and future effects of climate change, population growth, and development pressures and opportunities.**	The Proposal has been informed by engagement with mana whenua, KCDC, GWRC and other relevant stakeholders, with opportunities for ongoing mana whenua involvement provided through the proposed consent conditions. The integrated approach to development, stormwater management, ecological restoration and open space recognises the interconnected nature of the Site's natural and physical resources. While some adverse effects are acknowledged, the Proposal provides for ecological enhancement alongside residential and commercial development, contributing to a well-functioning urban environment and responding to anticipated population growth.
Policy IM.1: Integrated management – ki uta ki tai - consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, local authorities shall adopt an integrated approach to the management of the region's natural and physical resources, including by: a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and c) recognising that the effects of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries; and d) recognising the interrelationship between natural and physical resources; and e) making decisions based on the best available information, improvements in technology, science, and mātauranga Māori; and f) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori while upholding Māori data sovereignty	The Proposal has been developed through an integrated design process involving a range of technical disciplines, together with engagement with mana whenua, KCDC and GWRC. The design recognises the interrelationship between land use, freshwater, ecology, stormwater, flood management and urban development, with the associated effects considered across the wider Site and surrounding environment. The Proposal is supported by technical assessments and has been progressively refined in response to consultation and further investigations.
Objective CC.1 The Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and climate change adaptation are an integral part of: sustainable air, land, freshwater, and coastal management; and well-functioning urban areas and rural areas; and the planning and delivery of infrastructure (including regionally significant infrastructure).	The Proposal supports a compact, mixed-use urban development within an established metropolitan centre, providing opportunities to reduce reliance on private vehicles through improved walking, cycling and public transport connections. Climate change considerations have also informed the stormwater and flood management design, including provision for flood storage. Overall, the Proposal contributes to a more resilient and well-functioning urban environment.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
Objective CC.2 The costs and benefits of transitioning to a low-emission and climate-resilient region are equitable between sectors and communities.	The Proposal contributes to these objectives through the provision of compact residential and commercial development within an established urban centre, with improved opportunities for walking, cycling and public transport. The proposed stormwater management, flood storage, wetland restoration and indigenous planting also incorporate nature-based approaches that contribute to environmental resilience and ecological enhancement. While the Proposal will generate emissions during construction and operation, its overall design supports more efficient urban development and responds to the anticipated effects of climate change.
Objective CC.3 To support the global goal of limiting warming to 1.5 degrees Celsius and New Zealand's greenhouse gas emissions reduction targets, net greenhouse gas emissions in the Wellington Region are reduced: to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels by 2030; and to contribute to achieving net-zero greenhouse gas emissions by 2050.	
Objective CC.4 Nature-based solutions are an integral part of climate change mitigation and climate change adaptation, improving the health, well-being and resilience of people and communities, indigenous biodiversity, and natural and physical resources.	
Objective CC.5 By 2030, there is an increase in the area and health of permanent forest, preferably indigenous forest, in the Wellington Region, maximising benefits for carbon sequestration, indigenous biodiversity, land stability, water quality, and social, cultural and economic well-being.	
Objective CC.6 Resource management and adaptation planning increases the resilience of communities, infrastructure and the natural environment to the short, medium, and long-term effects of climate change.	The Proposal has been informed by technical assessments addressing flood hazards and stormwater management. The proposed flood storage and stormwater infrastructure seek to manage future risks and improve the resilience of the Site and surrounding environment. These matters have also been considered through engagement with KCDC and GWRC, with ongoing management and monitoring provided for through the proposed draft consent conditions.
Objective CC.7 People and businesses understand the current and predicted future effects of climate change, how these may impact them, how to respond to the challenges of climate change, and are actively involved in appropriate climate change mitigation and climate change adaptation responses.	
Policy CC.9 Reducing greenhouse gas emissions associated with subdivision, use or development – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use or development has been planned in a way that contributes to reducing greenhouse gas emissions by optimising overall transport demand, by maximising mode shift from private vehicles to public transport or active modes, and supporting low and zero-carbon modes.	The Proposal provides for a compact, mixed-use development within the Metropolitan Centre Zone, integrating residential, commercial and retail activities in a location accessible to existing public transport services. The proposed pedestrian and cycle connections, including the Iver Trask Place extension and internal shared path network, will improve connectivity within the Site and to surrounding areas. These measures provide opportunities to reduce reliance on private vehicles and support a shift towards more sustainable transport modes, consistent with the intent of this policy.
Policy CC.11 Encouraging whole of life greenhouse gas emissions assessment for transport infrastructure Encourage whole of life greenhouse gas emissions assessments to be provided with resource consent applications to Wellington Regional Council and resource consent applications and notices of requirement to city and district councils for all new or upgraded land transport infrastructure. This information will assist with evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner that contributes to reducing transport-related greenhouse gas emissions in the Wellington Region.	The Proposal includes new roading and transport infrastructure to service the development and improve connectivity with the surrounding transport network. While a whole of life greenhouse gas emissions assessment has not been undertaken, the transport network has been designed to accommodate walking and cycling alongside vehicle movements, with connections to existing public transport services. These measures provide opportunities to reduce reliance on private vehicles and associated transport emissions. Noting that the policy encourages, rather than requires, such assessments, the absence of a whole of life assessment is not considered inconsistent with the policy.
Policy CC.14 Climate-responsive development – district and city council consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, require that development and infrastructure is located, designed and constructed in ways that provide for climate change mitigation, climate change adaptation and climate-resilience prioritising the use of nature-based solutions and informed by mātauranga Māori. This includes as appropriate to the scale and context of the activity: a) providing urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: i. prioritising the use of appropriate indigenous species, and ii. contributing to achieving a wider target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050; and b) methods to increase water resilience, including by requiring harvesting of water at a domestic and/or community-scale for non-potable uses (for	The Proposal incorporates a range of measures that respond to climate change mitigation and adaptation, including open space, the creation of a new wetland complex and flood storage and stormwater management infrastructure. The infrastructure design has considered future rainfall and flood hazards, with the overall approach incorporating nature-based solutions where practicable. The Proposal is therefore considered generally consistent with the intent of this policy.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
example by requiring rain tanks, rainwater re-use tanks, and setting targets for rainwater collection); and c) avoiding significant adverse effects on the climate change mitigation, climate change adaptation and climate-resilience functions and values of an ecosystem, and avoiding, minimising, or remedying other adverse effects on these functions and values; and d) promoting efficient use of water and energy in buildings and infrastructure; and e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.	
Policy CC.14A Climate-responsive development – regional council consideration When considering an application for a resource consent, or a change, variation, or review of a regional plan, require that development and infrastructure is located, designed, and constructed in ways that provide for climate change mitigation, climate change adaptation and climate-resilience, prioritising the use of nature-based solutions and informed by mātauranga Māori. This includes, as appropriate to the scale and context of the activity: (a) avoiding significant adverse effects on the climate change mitigation, climate change adaptation and climate-resilience functions and values of an ecosystem and avoiding, minimising, or remedying other adverse effects on these functions and values.	The Proposal incorporates climate change adaptation measures through its stormwater management and flood storage design. Overall, the Proposal incorporates nature-based solutions where practicable and is considered generally consistent with the intent of this policy.
3.2 COASTAL ENVIRONMENT (INCLUDING PUBLIC ACCESS)	
Objective 3 **Habitats and features in the coastal environment that have significant indigenous biodiversity values are protected; and Habitats and features in the coastal environment that have recreational, cultural, historical or landscape values that are significant are protected from inappropriate subdivision, use and development.**	The *Ecological Impact Assessment* identifies that the Site is highly modified, with terrestrial habitats of negligible to low ecological value and no identified areas of significant indigenous vegetation. While the Proposal involves wetland reclamation and dune modification, the associated ecological and landscape effects have been assessed, with wetland compensation, stream enhancement and an integrated open space network proposed. Overall, the Proposal is considered to appropriately respond to this objective, having regard to the Site's anticipated urban development.
Objective 4 **The natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development.**	The Site is within a modified coastal environment where urban development is anticipated. While the Proposal involves dune modification and wetland reclamation, the associated natural character effects have been assessed in the *Landscape and Visual Impact Assessment*. The proposed enhancement of the Wharemaukū Stream, creation of a new wetland complex and wider landscape planting will contribute to natural character outcomes across the Site. Overall, the Proposal is considered to appropriately respond to this objective.
Objective 5 **Areas of the coastal environment where natural character has been degraded are restored and rehabilitated.**	The Proposal provides opportunities to enhance natural character through the naturalisation and riparian planting of the Wharemaukū Stream, creation of a new indigenous wetland complex and extensive landscape planting. While existing wetlands and dune landforms will be modified or removed, the proposed landscape and ecological measures will contribute to the rehabilitation and enhancement of natural character across the Site.
Objective 7 **The integrity, functioning and resilience of physical and ecological processes in the coastal environment are protected from the adverse effects of inappropriate subdivision, use and development.**	The Proposal will modify existing dune landforms and reclaim wetlands, with associated effects on coastal physical and ecological processes. These effects have been assessed in the technical reports, with wetland compensation, enhancement of the Wharemaukū Stream and associated ecological management measures proposed. The objective seeks protection from inappropriate subdivision, use and development, rather than precluding development or modification of existing features altogether. Having regard to the Site's modified environment, anticipated urban development and the proposed management of effects, the Proposal is not considered inappropriate in the context of this objective.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
Objective 8 **Public access to and along the coastal marine area, lakes and rivers is enhanced (objective 8 is shared for the coastal environment and fresh water).**	The Proposal will enhance public access along the Wharemaukū Stream through the provision of an integrated network of pedestrian and cycle connections and adjoining open spaces. These connections will improve accessibility to the stream corridor and provide opportunities for recreation and enjoyment of the freshwater environment.
Policy 35 Preserving the natural character of the coastal environment – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to preserving the natural character of the coastal environment by: a) minimising any adverse effects from point source and non-point source discharges, so that aquatic ecosystem health is safeguarded; b) protecting the values associated with estuaries and bays, beaches and dune systems, including the unique physical processes that occur within and between them from inappropriate subdivision, use and development, so that healthy ecosystems are maintained; c) maintaining or enhancing amenity – such as, open space and scenic values – and opportunities for recreation and the enjoyment of the coast by the public; d) minimising any significant adverse effects from use and enjoyment of the coast by the public; e) safeguarding the life supporting capacity of coastal and marine ecosystems; f) maintaining or enhancing biodiversity and the functioning of ecosystems; and **g)** protecting scientific and geological features from inappropriate subdivision, use and development.	The Proposal will result in the modification of existing dune landforms and reclamation of wetlands, with associated effects on natural character and ecological values. These effects have been assessed in the supporting landscape and ecological reports. While adverse effects on the dune system are acknowledged, the Proposal incorporates wetland compensation, enhancement of the Wharemaukū Stream corridor, indigenous planting and an integrated open space network that will improve public access and recreational opportunities. Stormwater management measures are also proposed to minimise adverse effects on receiving environments. No significant scientific or geological features have been identified as being affected. Having regard to the matters in Policy 35(a)–(g), including the distinction between development and inappropriate development, the Proposal is not considered inconsistent with this policy.
Policy 36: Managing effects on natural character in the coastal environment – consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect natural character in the coastal environment, and in determining whether an activity is inappropriate particular regard shall be given to: (a) the nature and intensity of the proposed activity including: i. the functional need or operational requirement to locate within the coastal environment ii. the opportunity to mitigate anticipated adverse effects of the activity (b) the degree to which the natural character will be modified, damaged or destroyed including: i. the duration and frequency of any effect, and/or ii. the magnitude or scale of any effect; iii. the irreversibility of adverse effects on natural character values; iv. whether the activity will lead to cumulative adverse effects on the natural character of the site/area. (c) the resilience of the site or area to change; (d) the opportunities to remedy or mitigate previous damage to the natural character; (e) the existing land uses on the site.	The Proposal will result in permanent modification of existing dune landforms and reclamation of wetlands, with associated adverse effects on natural character. These effects, including their scale and permanence, have been assessed in the supporting technical reports. While the development does not have a functional need to locate within the coastal environment, the Site is zoned for metropolitan centre development and is already highly modified. The Proposal incorporates wetland compensation, enhancement of the Wharemaukū Stream corridor and extensive landscape planting, providing opportunities to enhance natural character elsewhere within the Site. Having regard to the matters in Policy 36(a)–(e), including the existing land use, anticipated urban development and opportunities to manage adverse effects, the Proposal is not considered inconsistent with this policy. The *Landscape and Visual Impact Assessment* assesses the resulting adverse natural character effects as Low–Moderate overall following landscape treatment, while acknowledging that the loss and modification of the existing dune landforms will result in more pronounced localised effects.
Policy 37: Safeguarding life-supporting capacity of coastal ecosystems – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to safeguarding the life-supporting capacity of coastal and marine ecosystems by maintaining or enhancing: a) any area within the intertidal or subtidal zone that contains unique, rare, distinctive or representative marine life or habitats; b) areas used by marine mammals as breeding, feeding or haul out sites; c) habitats in the coastal environment that are important during the vulnerable life stages of indigenous species;	The Proposal does not affect any intertidal or subtidal habitats or identified marine mammal habitats. However, the reclamation of existing wetlands and modification of dune landforms will affect coastal habitats and associated ecological processes. These effects have been assessed in the Ecological Impact Assessment, with wetland compensation, enhancement of the Wharemaukū Stream corridor and fauna management measures proposed to address effects on indigenous species and ecological connectivity. While the loss of existing habitats is acknowledged, the Proposal incorporates measures intended to maintain and enhance ecological functioning and biodiversity across the Site.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
d) habitats, corridors and routes important for preserving the range, abundance, and diversity of indigenous and migratory species; e) any area that contain indigenous coastal ecosystems and habitats that are particularly vulnerable to modification – such as, estuaries, lagoons, coastal wetlands, dunelands, rocky reef systems and salt marshes; and **f)** the integrity, functioning and resilience of physical and ecological processes.	Overall, the Proposal is not considered to be inconsistent with this policy.
3.3 ENERGY, INFRASTRUCTURE AND WASTE	
The definition of Regionally Significant Infrastructure in the RPS includes: • *facilities for the generation and transmission of electricity where it is supplied to the network, as defined by the Electricity Governance Rules 2003* • *the local authority water supply network and water treatment plants* • *the local authority wastewater and stormwater networks, systems and wastewater treatment plants*	
Objective 9 The region's energy needs are met in ways that: a) **improve energy efficiency and conservation;** b) **diversify the type and scale of renewable energy development;** c) **maximise the use of renewable energy resources;** d) **reduce dependency on fossil fuels; and** e) **reduce greenhouse gas emissions from transportation.**	The Proposal provides for a significant mixed-use development within the Metropolitan Centre Zone, incorporating residential, commercial and retail activities in a location intended to accommodate urban growth. The integration of residential development with employment, retail and other services provides opportunities to reduce trip lengths and reliance on private vehicles. The Proposal also incorporates an interconnected network of pedestrian and cycle routes, including connections to the wider transport network and existing public transport services. The *Integrated Transport Assessment* confirms that the anticipated traffic demands can be accommodated through the proposed transport infrastructure and associated network improvements, while providing for safe and efficient connections to the surrounding road network. The Proposal will also extend and upgrade existing three waters infrastructure to service the development, recognising the importance of this infrastructure in supporting urban growth. While the Proposal does not specifically provide for renewable energy generation, its compact urban form, mixed-use activities and provision for active transport support improved transport efficiency and opportunities to reduce transport-related greenhouse gas emissions. Overall, the Proposal is considered to be consistent with Objectives 9 and 10 and Policy 57.
Objective 10 The social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected	
Policy 57: Integrating land use and transportation – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, seek to achieve integrated land use and transport within the Wellington Region by: a) locating development in areas near centres and well-serviced by existing or planned public transport, to minimise private vehicle travel and trip length and maximise mode shift to public transport or active modes; and b) supporting connectivity with, and accessibility to public services or amenities, key centres of employment activity or retail activity via public and active transport networks; and c) supporting a safe, reliable, equitable, inclusive and efficient transport network including through connections with the wider transport network; and d) providing safe and accessible multi-modal transport networks along connected routes that are designed for public and active transport, while recognising that the delivery of public transport services may not always be efficient or practical; and **e)** supporting and enabling the rapid transport network and the growth corridors in the Wellington Region, including: i. Western Growth Corridor – Tawa to Levin; ii. Eastern Growth Corridor – Hutt to Masterton; iii. Let's Get Wellington Moving Growth Corridor; and (f) minimising the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.	
FRESHWATER (INCLUDING PUBLIC ACCESS)	
Objective 12 seeks that the quantity and quality of freshwater meets the range of uses and values for which water is required, that the life supporting capacity of water bodies is safeguarded, and that the reasonably foreseeable needs of future generations are met. The subsequent policies set out methods to achieve the objective, including Policy 40 which is to safeguard aquatic ecosystem health in water bodies, Policy 41 minimising the effects of earthworks and vegetation disturbance (relating to erosion and silt and sediment runoff into water) and Policy 42 to minimise contamination in stormwater from development. Objective 13 seeks that the region's rivers, lakes and wetlands support healthy, functioning ecosystems. The subsequent policies are Policy 43 protecting aquatic ecological function of water bodies.	
Objective 12 The mana of the Region's waterbodies and freshwater ecosystems is restored and protected by ongoing management of land and water that: a) **returns the Region's water bodies and freshwater ecosystems to, and thereafter maintains them, in a state of tūhauora/good health; and**	The Proposal will result in the reclamation of existing wetlands, with associated effects on freshwater ecosystems. These effects have been assessed in the *Ecological Impact Assessment* and *Wetland Residual Effects Report*, with a new indigenous wetland complex proposed as ecological compensation.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
b) improves the health and wellbeing of the Region's degraded waterbodies and freshwater ecosystems; and c) applies the Te Mana o te Wai hierarchy of obligations by prioritising: i. first, the health and wellbeing of waterbodies and freshwater ecosystems, ii. second, the health needs of people iii. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and d) recognises and provides for the individual natural characteristics and processes of waterbodies including their natural form, and their associated ecosystems; and e) incorporates and protects mātauranga Māoi and acknowledges and provides for the connections and relationships of mana whenua / tangata whenua with freshwater; and f) provides for the ability of mana whenua / tangata whenua to safely undertake their cultural and spiritual practices associated with freshwater, including mahinga kai; and g) actively involves mana whenua / tangata whenua in decision-making in relation to the Region's waterbodies; and h) includes engagement with communities, stakeholders, and territorial authorities; and i) supports the wellbeing and safety of the community, by providing for the ability to carry out recreational activities, in and around freshwater environments; and j) supports and protects an abundance and diversity of freshwater habitats for indigenous freshwater species and, where appropriate, the habitat of trout and salmon; and k) supports the reasonable, sustainable and efficient use of water for activities that benefit the Region's economy, including primary production activities, innovation and tourism.	The Proposal also provides for the retention and enhancement of the Wharemaukū Stream corridor, including riparian planting, improvements to ecological connectivity and opportunities for public access and recreation. Stormwater management infrastructure and erosion and sediment control measures are proposed to manage runoff and minimise adverse effects on receiving freshwater environments. The Proposal has been informed by engagement with GWRC, KCDC and mana whenua, with opportunities for ongoing mana whenua involvement in the implementation of ecological management measures. Overall, while adverse effects on existing freshwater habitats are acknowledged, the proposed ecological compensation, stream enhancement and stormwater management measures are considered to provide an appropriate response to Objective 12.
Objective 13 The region's rivers, lakes and wetlands support healthy functioning ecosystems.	The Proposal will result in the reclamation of existing wetlands, with a new indigenous wetland complex proposed as ecological compensation. The Wharemaukū Stream will be retained and enhanced through riparian planting and associated ecological improvements. Stormwater management infrastructure will be provided to manage runoff from the development, while erosion and sediment control measures will be implemented during earthworks to minimise sediment discharge to receiving waterbodies. Together, these works are intended to support healthy functioning freshwater ecosystems.
Objective 14: Fresh water available for use and development is allocated and used efficiently.	The Proposal will be serviced by the existing public water supply network. A groundwater bore is also proposed for construction purposes, although this will only be used if necessary. Any groundwater abstraction will therefore be temporary and limited to construction requirements.
Policy 40: Maintaining and improving the health and well-being of water bodies and freshwater ecosystems – consideration When considering an application for a regional resource consent, the regional council must have regard to: a) managing water quality, flows and water levels and aquatic habitats of water bodies in a way that improves the health and well-being of degraded waterbodies and freshwater ecosystems, and at least maintains the health and wellbeing of all other water bodies and freshwater ecosystems; and b) managing water quality in the coastal marine area in a way that maintains and, where degraded, protects and enhances the health and well-being of coastal waterbodies and the health and wellbeing of marine ecosystems; and c) providing for mana whenua / tangata whenua values, including mahinga kai; and d) partnering with mana whenua / tangata whenua; and e) maintaining or enhancing the ecological functions of riparian margins; and	The Proposal will result in the reclamation of existing wetlands, with a new indigenous wetland complex proposed as ecological compensation. The Wharemaukū Stream will be retained and enhanced through riparian planting and associated ecological improvements, with opportunities to improve freshwater habitat, ecological connectivity and public access along the stream corridor. Stormwater management infrastructure and erosion and sediment control measures are proposed to manage runoff and minimise sediment discharges to receiving waterbodies. The Proposal also incorporates ecological management measures addressing indigenous freshwater species and fish passage, with opportunities for ongoing mana whenua involvement in implementation. While adverse effects on existing freshwater habitats are acknowledged, the proposed compensation, stream enhancement and management measures are considered to

PROVISION	COMMENT
f) minimising the effect of proposals such as gravel extraction, exploratory drillings, flood protection and works in the beds of lakes and rivers on groundwater recharge areas that are connected to surface water bodies; and g) maintaining or enhancing the amenity and recreational values of rivers and lakes, including those with significant values listed in Table 15 of Appendix 1; and h) protecting the values of rivers and lakes that have significant indigenous ecosystems and habitats with significant indigenous biodiversity values as identified in Table 16 of Appendix 1; and i) maintaining natural flow regimes required to support aquatic ecosystem health; and j) maintaining or enhancing space for rivers to undertake their natural processes; and k) maintaining fish passage except when this conflicts with clause (o); and l) protecting and reinstating riparian habitat, in particular riparian habitat that is important for fish spawning; and m) restricting stock access to estuaries rivers, lakes and wetlands; and n) avoiding the removal or destruction of indigenous wetland plants in wetlands; and o) protecting the habitat of indigenous freshwater species; and p) protecting the habitat of trout and salmon, insofar as this is consistent with clause (o).	provide an appropriate response to the relevant matters in Policy 40.
Policy 40A - Loss of extent and values of natural inland wetlands – consideration When considering an application for a regional resource consent for use and development within natural inland wetlands the regional council must not grant consent unless: a) there will be no loss of extent of natural inland wetlands and their values will be protected; or b) any loss of extent or values, arises from any of the following: i. the customary harvest of food or resources undertaken in accordance with tikanga Māori ii. wetland maintenance, restoration, or biosecurity (as defined in the National Policy Statement for Freshwater Management 2020) iii. scientific research iv. the sustainable harvest of sphagnum moss v. the construction or maintenance of wetland utility structures (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020) vi. the maintenance or operation of specified infrastructure, or other infrastructure (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020) vii. natural hazard works (as defined in the Resource Management (National Environmental Standards for Freshwater) Regulations 2020); or c) any loss of extent or values is a result of use and development within natural inland wetlands that: i. is necessary for the purpose of the construction or upgrade of specified infrastructure that will provide significant national or regional benefits; or ii. is necessary for the purpose of urban development that contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development 2020), and: a. the urban development will provide significant national, regional or district benefits; and b. the activity occurs on land that is identified for urban development in operative provisions of a regional or district plan; and c. the activity does not occur on land that is zoned in a district plan as general rural, rural production, or rural lifestyle; and d. there is no practicable alternative location for the activity within the area of the development, or every other practicable location in the	The Proposal will result in the reclamation of existing natural inland wetlands, with the associated loss of wetland extent and values. Accordingly, the relevant provisions of Policy 40A are those relating to urban development under clause (c)(ii), together with the requirements to apply the effects management hierarchy and provide for the ongoing management of ecological compensation under clauses (c)(vii) and (d). With respect to clause (c)(ii), the following is noted: • Well-functioning urban environment: The Proposal will provide a comprehensive mixed-use development comprising approximately 604 residential units, large-format retail, commercial activities, public open spaces and an integrated transport network. The development will contribute to a well-functioning urban environment by providing a range of housing typologies, supporting employment and commercial activities, improving connectivity and enabling more efficient use of land within the existing urban area. • Significant national, regional or district benefits (clause (c)(ii)(a)): The Proposal will deliver significant district and regional benefits through additional housing capacity, employment opportunities, commercial activity and supporting infrastructure. As outlined in the *Economic Assessment*, the development will contribute to housing supply, strengthen the role and function of the Paraparaumu Metropolitan Centre and provide wider economic benefits during construction and operation. • Land identified for urban development (clause (c)(ii)(b)): The Site is zoned Metropolitan Centre Zone under the Kapiti Coast District Plan and is subject to Precinct C provisions that specifically anticipate comprehensive urban development. The Proposal therefore occurs on land identified for urban development in the operative District Plan. • Rural zoning exclusion (clause (c)(ii)(c)): The Site is not zoned General Rural, Rural Production or Rural Lifestyle. Accordingly, this requirement is satisfied. • Practicable alternatives (clause (c)(ii)(d)): The retention of existing wetlands has been considered through the design process, including the assessment of alternative development layouts. As outlined in the *Urban Design Outcomes and Wetland and Dune Retention* assessment,

PROVISION	COMMENT
area of the development would have equal or greater adverse effects on a natural inland wetland; or iii. is necessary for the purpose of quarrying activities and the extraction of the aggregate will provide significant national or regional benefits; or iv. is for the purpose of the extraction of minerals (other than coal) and ancillary activities and the extraction of the mineral will provide significant national or regional benefits; or v. is necessary for the purpose of constructing or operating a new or existing landfill or cleanfill area and the landfill or cleanfill area: a) will provide significant national or regional benefits; or b) is required to support urban development; or c) is required to support the extraction of aggregates as referred to in clause, (c)(iii); or d) is required to support the extraction of minerals as referred to in clause (c)(iv); and e) there is either no practicable alternative location in the Wellington Region, or every other practicable alternative location in the Wellington Region would have equal or greater adverse effects on a natural inland wetland; and vi. in relation to clauses (c)(i), (c)(iii), and (c)(iv) there is a functional need for the activity to be done in that location; and vii. in all cases, the effects of the activity will be managed through applying the effects management hierarchy; and (d) for any activity listed in clauses (b)-(c), other than sub-clause (b)(i), the council is satisfied that: i. the applicant has demonstrated how each step of the effects management hierarchy will be applied to any loss of extent or values of the wetland (including cumulative effects and loss of potential value), particularly (without limitation) in relation to the values of ecosystem health, indigenous biodiversity, hydrological functioning, Māori freshwater values, and amenity values; and ii. where aquatic offsetting or aquatic compensation is applied, the applicant has complied with principles 1 to 6 in Appendix 6 and 7 of the National Policy Statement for Freshwater Management 2020, and has had regard to the remaining principles in Appendix 6 and 7, as appropriate; and iii. there are methods or measures that will ensure that the offsetting or compensation will be maintained and managed over time to achieve the conservation outcomes; and iv. suitable conditions will be applied to the consent (if granted) that apply the effects management hierarchy, require the monitoring of the wetland at a scale commensurate with the risk of the loss of extent or values of the wetland, and specify how the requirements in clause (d)(iii) will be achieved. *… [remaining clauses of policy not applicable to urban development]*	retaining the existing wetlands would have significant implications for the proposed urban structure, including the ability to provide an integrated street network, appropriate development intensity and a connected arrangement of residential, commercial and open space activities. The location and extent of the proposed wetland compensation area have also been informed by ecological, hydrological, stormwater and flood management considerations. On this basis, the Proposal seeks to demonstrate that there is no practicable alternative within the development area that would avoid wetland loss while achieving the intended urban development outcomes. In terms of clause (c)(vii), the effects management hierarchy has informed the assessment and management of effects on natural inland wetlands. While the loss of existing wetlands cannot be avoided within the proposed development layout, measures are proposed to minimise effects during construction, with residual effects addressed through the creation of a new indigenous wetland complex within the Site. The *Wetland Residual Effects Analysis* identifies the extent of residual effects and sets out the proposed ecological compensation approach, including the application of the relevant principles in Appendix 7 of the NPS-FM. The proposed compensation is intended to achieve a net positive ecological outcome, with the assessment identifying a modelled gain of approximately 28.5% relative to the wetland impacts. With respect to clause (d), the *Ecological Impact Assessment*, *Wetland Residual Effects Analysis* and *Ecological Management Plan* collectively address the effects of wetland loss, the proposed compensation measures and their ongoing implementation. The proposed management framework includes ecological monitoring, weed and pest management, maintenance, performance measures and adaptive management to support the establishment and long-term functioning of the new wetland complex. These measures can be secured through appropriate consent conditions. Overall, the Proposal falls within the urban development pathway provided for under Policy 40A(c)(ii). While the loss of existing wetlands is acknowledged, the Proposal will deliver significant urban development benefits on land specifically zoned for that purpose, with the effects management hierarchy and proposed wetland compensation measures providing a framework for managing the associated ecological effects. Subject to the decision-maker being satisfied as to the practicable alternatives assessment and the requirements of clause (d), the Proposal is considered to appropriately respond to Policy 40A.
Policy 41: Managing the effects of earthworks and vegetation clearance – consideration When considering an application for a regional resource consent for earthworks or vegetation clearance have regard to: a) the extent to which the activity minimises erosion; and b) in the absence of environmental outcomes, target attribute states, or limits for suspended sediment for the relevant Freshwater Management Unit or part-Freshwater Management Unit, the extent to which silt and sediment runoff into water, or onto or into land that may enter water, will be minimised; and c) the extent to which the activity results in adverse effects on aquatic ecosystem health, indigenous biodiversity in water bodies and receiving environments.	The Proposal involves substantial earthworks and vegetation clearance to facilitate the development. The ECMP sets out measures to minimise erosion and sediment runoff during construction, including measures to protect the Wharemaukū Stream and other receiving environments. Earthworks will be undertaken in accordance with the proposed erosion and sediment control measures, with ongoing monitoring and management to minimise sediment discharges and associated effects on aquatic ecosystem health and indigenous biodiversity. Overall, the proposed erosion and sediment control measures are considered to appropriately address the matters in Policy 41(a)–(c).
Policy 42: Effects on freshwater and receiving environments from urban development – consideration When considering an application for a regional resource consent that relates to urban development the regional council must have regard to:	The Proposal has been developed through an integrated design process involving planning, engineering, ecology, hydrology, landscape, urban design and transport considerations, recognising the relationship between urban development,

PROVISION	COMMENT
a) adopting an integrated approach, ki uta ki tai, that recognises the interconnectedness of the whole environment to determine the location and form of urban development; and b) protecting and enhancing Māori freshwater values, including mahinga kai, in partnership with mana whenua / tangata whenua; and c) providing for mana whenua / tangata whenua and their relationship with their culture, land, water, wāhi tapu and other taonga; and d) incorporating the use of mātauranga Māori to ensure the effects of urban development are considered appropriately; and e) the effects of use and development of land on water, including the effects on receiving environments (both freshwater and the coastal marine area); and f) the target attribute states set for the catchment; and g) the extent to which the urban development, including stormwater discharges, meets any limits set in a regional plan and the effect of any exceedances; and h) the extent to which urban development incorporates water sensitive urban design techniques and hydrological control to minimise the generation of contaminants from stormwater runoff, and maximise, to the extent practicable, the removal of contaminants from stormwater; and i) the extent to which urban development is located and designed to protect and enhance the health and wellbeing of adjacent rivers, lakes, wetlands, springs, riparian margins, and receiving environments, including the natural form and flow of the waterbody; and j) the extent to which hydrological control minimises adverse effects of runoff quantity (flows and volumes) and other potential adverse effects on natural stream values; and k) the provision of riparian buffers for urban development adjacent to natural waterbodies; and l) the extent to which the development avoids piping of rivers and whether there is a functional need for the activity in that location; and m) the practicability of daylighting rivers within the area proposed for urban development area; and n) efficient end use of water and alternate water supplies for non- potable use; and o) protecting drinking water sources from inappropriate use and development; and p) applying a catchment approach to wastewater networks including partnering with mana whenua as kaitiaki and allowance for appropriately designed overflow points where necessary to support growth and consideration of different approaches to wastewater management to resolve overflow.	freshwater environments and the wider Wharemaukū Stream catchment. The *Hydrological Effects Assessment* has considered the relationships between the existing wetlands, shallow groundwater, surface water drainage and the Wharemaukū Stream, including the changes associated with the proposed earthworks, modification of ground levels and establishment of new drainage and stormwater infrastructure. These considerations have informed the integrated design of the development, including the proposed stormwater management system, flood storage areas and wetland compensation complex. While the Proposal involves the reclamation of existing wetlands, a new indigenous wetland complex is proposed as ecological compensation. The compensation wetland has been designed to receive water from the realigned Watercourse 1 and the eastern part of the Site, with ground levels and water supply arrangements intended to establish suitable inundation and saturation conditions for a range of wetland habitats. The wetland will also provide flood storage functions as part of the wider stormwater and flood management network. The Wharemaukū Stream will be retained in its existing alignment and enhanced through riparian planting and associated ecological improvements. The proposed stormwater management system also incorporates water sensitive design measures, treatment and attenuation to manage runoff and minimise adverse effects on receiving environments. Draft consent conditions included in the application are intended to manage effects on freshwater and receiving environments, including requirements relating to: • Preparation, implementation and monitoring of erosion and sediment control measures during earthworks to minimise sediment discharges to receiving waterbodies. • Detailed design and implementation of stormwater treatment, attenuation and flood storage infrastructure to manage runoff volumes, flows and contaminants. • Establishment, planting, maintenance and long-term management of the proposed indigenous wetland complex, including ecological and hydrological monitoring, groundwater level monitoring and adaptive management to support the intended wetland habitats. • Riparian planting and ecological enhancement of the Wharemaukū Stream corridor, including measures to protect freshwater habitat and ecological connectivity. • Implementation of relevant ecological management plans, including native fish management and relocation measures where required. • Opportunities for mana whenua participation in the detailed design, implementation and monitoring of relevant ecological and freshwater management measures. • Management of construction activities, including works in proximity to waterbodies, to minimise adverse effects on freshwater ecosystems. Overall, the integrated design approach, informed by the hydrological and ecological assessments and supported by the proposed consent conditions, is considered to provide an appropriate response to the relevant matters in Policy 42(a)–(p).
3.5 HISTORIC HERITAGE	
Objective 15 Historic heritage is identified and protected from inappropriate modification, use and development. **Policy 46: Managing effects on historic heritage values – consideration** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect a place, site or area with historic heritage	The Site does not contain any identified historic heritage sites scheduled in the District or Regional Plans or listed by Heritage New Zealand Pouhere Taonga. An Archaeological Assessment has been prepared to assess the potential for archaeological material to be encountered during earthworks. An Archaeological Authority is also being sought in the application and the proposed draft consent conditions include

PROVISION	COMMENT
value, and in determining whether an activity is inappropriate particular regard shall be given to: a) the degree to which historic heritage values will be lost, damaged or destroyed; b) the irreversibility of adverse effects on heritage values; c) the opportunities to remedy or mitigate any previous damage to heritage values; d) the degree to which previous changes that have heritage value in their own right are respected and retained; e) the probability of damage to immediate or adjacent heritage values; f) the magnitude or scale of any effect on heritage values; g) the degree to which unique or special materials and/or craftsmanship are retained; h) whether the activity will lead to cumulative adverse effects on historic heritage; and i) whether the relationships between distinct elements of an historic place, site or area will be maintained.	accidental discovery protocols to manage any archaeological material encountered during construction.
3.6 INDIGENOUS ECOSYSTEMS	
Objective 16 seeks that indigenous ecosystems and habitats with significant biodiversity values are maintained and restored to a healthy functioning state. Subsequent Policy 47 sets out the considerations required by decision makers to manage effects on ecosystems and habitats with indigenous biodiversity values. Policy 23 sets out the methodology that requires indigenous ecosystems and habits with significant indigenous biodiversity values are identified for district and regional plans. Policy 24 then sets out that district and regional plans must include provisions to protect the identified areas from inappropriate subdivision, use and development.	
Objective 16 **Indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of indigenous fauna, and the ecosystem processes that support these ecosystems and habitats, are protected and, where appropriate, enhanced and restored to a healthy functioning state.**	The *Ecological Impact Assessment* identifies that the Site is highly modified, with terrestrial habitats generally having negligible to low ecological values, although some freshwater and fauna habitats have higher ecological values. The Proposal will result in the reclamation of existing wetlands and modification of habitats, with associated effects on indigenous biodiversity. These effects have been assessed in the supporting ecological reports, with a new indigenous wetland complex proposed as ecological compensation. The Proposal also incorporates enhancement of the Wharemaukū Stream corridor, indigenous planting and ecological management measures addressing native fish, lizards and avifauna. While the loss of existing habitats is acknowledged, the proposed compensation and management measures are intended to support indigenous biodiversity and the establishment of healthy functioning ecosystems.
Objective 16A **The region's indigenous biodiversity is maintained and, where appropriate, enhanced and restored to a healthy functioning state, improving its resilience to increasing environmental pressures, particularly climate change.**	The Proposal will result in the loss of existing wetland and terrestrial habitats, with associated effects on indigenous biodiversity. These effects have been assessed in the supporting ecological reports, with a new indigenous wetland complex proposed as ecological compensation. The Proposal also incorporates enhancement of the Wharemaukū Stream corridor, extensive indigenous planting and ecological management measures, including ongoing monitoring and adaptive management. These measures are intended to improve ecological connectivity, support indigenous species and establish more resilient freshwater and terrestrial habitats over time, including in response to climate change.
Objective 16B **Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity.**	The Interim Cultural Impact Assessment identifies matters of importance to mana whenua, including the relationship between ecosystem health, taonga species and the exercise of kaitiakitanga. In response, the proposed draft consent conditions seek to provide for ongoing mana whenua involvement in the detailed design, implementation and monitoring of ecological management measures, including wetland compensation, indigenous planting, freshwater habitat enhancement and relevant fauna management

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
	plans. These conditions provide opportunities for mātauranga Māori and mana whenua values to inform ecological outcomes and support the exercise of kaitiakitanga throughout implementation. While the cultural effects associated with the loss of existing wetlands and modification of dune landforms are acknowledged, the proposed conditions provide a framework for ongoing mana whenua involvement in the management and enhancement of indigenous biodiversity.
Objective 16C **Landowner and community values in relation to indigenous biodiversity are recognised and provided for and their roles as stewards are supported.**	The Proposal has been informed by engagement with KCDC, GWRC, mana whenua and other stakeholders, including consideration of ecological values and opportunities for biodiversity enhancement. While the development will result in the loss of existing habitats, the proposed wetland compensation, enhancement of the Wharemaukū Stream corridor and extensive indigenous planting will provide opportunities to improve biodiversity outcomes across the Site. The proposed draft consent conditions include requirements for the establishment, ongoing maintenance, monitoring and management of these areas, supporting their long-term ecological functioning and stewardship.
Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values and other significant habitats of indigenous fauna – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of indigenous fauna, and the ecosystem processes that support these ecosystems and habitats, and in determining whether the proposed activity is inappropriate particular regard shall be given to: a) maintaining connections within, or corridors between, habitats of indigenous flora and fauna and/or enhancing the connectivity between fragmented indigenous habitats; and b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses; and c) managing natural wetlands for the purpose of aquatic ecosystem health, recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape; and d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats; and e) providing seasonal or core habitat for indigenous species; and f) protecting the life supporting capacity of indigenous ecosystems and habitats; and g) minimising or remedying adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable except where Clause (i) and (j) apply; and h) the need for a precautionary approach to be adopted when assessing and managing the potential for adverse effects on indigenous ecosystems and habitats, where; i. the effects on indigenous biodiversity are uncertain, unknown, or little understood; and ii. those effects could cause significant or irreversible damage to indigenous biodiversity; and i) the provisions to protect significant biodiversity values in Policy 24B, and Policy 24C and the principles for biodiversity offsetting and biodiversity compensation in Policy 24A, except that Policy 24A and Policy 24B do not apply to REG activities and ET activities; and j) the provisions to manage the adverse effects of REG activities and ET activities on significant biodiversity values in Policy 24D; and	The *Ecological Impact Assessment* identifies that the Site is highly modified, with terrestrial habitats generally having negligible to low ecological values, although some freshwater and fauna habitats have higher values. The Proposal will result in wetland reclamation and habitat modification, with associated effects addressed through the proposed wetland compensation, enhancement of the Wharemaukū Stream corridor, indigenous planting and fauna management measures. These measures are intended to support ecological connectivity, indigenous biodiversity and long-term ecosystem functioning. The proposed draft consent conditions also provide for ongoing ecological monitoring, maintenance, adaptive management and mana whenua involvement. While the loss of existing habitats is acknowledged, the Proposal is considered to appropriately respond to the relevant matters in Policy 47, including the management of residual and cumulative effects on indigenous biodiversity.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
k) protecting indigenous biodiversity values of significance to mana whenua / tangata whenua, including those associated with a significant site for mana whenua / tangata whenua identified in a regional or district plan; and l) enabling established activities affecting significant biodiversity values in the terrestrial environment to continue, where the effects of the activities: m) ensuring that the adverse effects of plantation forestry activities on significant indigenous biodiversity values in the terrestrial environment are managed in a way that: i. maintains significant indigenous biodiversity values as far as practicable, while enabling plantation forestry activities to continue; and **ii.** where significant biodiversity values are within an existing plantation forest, maintains the long-term populations of any Threatened or At Risk (declining) species present in the area over the course of consecutive rotations of production.	
Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development that may impact on indigenous biodiversity, recognise and provide for mana whenua / tangata whenua values and relationships associated with indigenous biodiversity, including by, but not restricted to: a) giving effect to the decision-making principles for indigenous biodiversity and, once they are established, the local expressions of the decision-making principles for indigenous biodiversity developed through Method IE.1; and b) enabling mana whenua / tangata whenua to exercise their roles as kaitiaki; and c) incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and **d)** (d) supporting mana whenua / tangata whenua to access and exercise sustainable customary use of	The Proposal has been informed by engagement with mana whenua, including consideration of the cultural values and relationships associated with the Site's indigenous biodiversity, wetlands and waterways. The *Interim Cultural Impact Assessment* identifies matters of importance to mana whenua, which have informed the consideration of effects and proposed management measures. The proposed consent conditions provide for ongoing mana whenua involvement in the detailed design, implementation and monitoring of ecological management measures, including opportunities to incorporate mātauranga Māori and exercise kaitiakitanga. The conditions are intended on recognising and providing for mana whenua values and relationships with indigenous biodiversity.
Policy IE.2A Maintaining indigenous biodiversity in the terrestrial environment – consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan or regional plan, indigenous biodiversity in the terrestrial environment that does not have significant indigenous biodiversity values as identified under Policy 23 and is not on Māori land, shall be maintained by: a) avoiding, remedying or mitigating the adverse effects of REG activities and ET activities to the extent practicable; and b) managing any significant adverse effects on indigenous biodiversity from any other proposed activity by applying the effects management hierarchy; and **c)** managing all other adverse effects on indigenous biodiversity to achieve at least no overall loss in indigenous biodiversity within the Wellington Region or district as applicable	The *Ecological Impact Assessment* identifies that the Site is highly modified, with terrestrial habitats generally having negligible to low ecological values and no identified areas of significant indigenous vegetation. The Proposal will result in the removal and modification of some terrestrial habitats, with associated effects on indigenous biodiversity. These effects will be managed through the proposed ecological management measures, including lizard and avifauna management, indigenous planting and enhancement of the Wharemaukū Stream corridor. The proposed wetland complex will also provide opportunities for additional indigenous terrestrial habitat. Together with the proposed monitoring, maintenance and adaptive management conditions, these measures are intended to manage adverse effects and achieve at least no overall loss of terrestrial indigenous biodiversity
LANDSCAPE	
Objective 17: **The region's outstanding natural features and landscapes are identified and their landscape values protected from inappropriate subdivision, use and development.**	The *Landscape and Visual Impact Assessment* confirms that the Site is not located within an identified Outstanding Natural Feature or Landscape. While the Proposal will involve modification of existing dune landforms and associated landscape values, these features are not identified as outstanding under the District Plan.
Objective 18: The region's special amenity landscapes are identified and those landscape values that contribute to amenity and the quality of the environment are maintained or enhanced.	The *Landscape and Visual Impact Assessment* confirms that the Site is not located within an identified Special Amenity Landscape. While the Proposal will involve modification of existing dune landforms and associated landscape values, these effects have been assessed in the supporting landscape assessment.
NATURAL HAZARDS	

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
Objective 19, 20 and 21, and their associated policies, seek to manage the risk of natural hazards, ensure hazards mitigation works do not cause adverse effects, and avoid inappropriate subdivision use and development in areas at high risk from hazards. Subsequent Policy 51 aims to minimise the risk and consequences of natural hazards events through sound preparation, investigation and planning prior to development.	
Objective 19 **The risks and consequences to people, communities, their businesses, property and infrastructure from natural hazards and climate change effects are reduced.**	The geotechnical hazards associated with the Proposal have been assessed by Torlesse Ltd. The assessment confirms that, subject to the recommended ground improvement, foundation design and construction measures, the residual geotechnical risks to people, property and infrastructure are low. The Proposal is not expected to accelerate or worsen the identified hazards.
Objective 20: Hazard mitigation measures, structural works and other activities do not increase the risk and consequences of natural hazard events.	Torlesse has assessed the proposed earthworks, engineered landforms and associated ground improvement measures, including their potential effects on adjoining land and infrastructure. The assessment confirms that the relevant slope stability requirements can be achieved and that settlement effects associated with temporary construction dewatering are expected to be negligible. Accordingly, the proposed works are not expected to increase geotechnical hazard risks.
Objective 21: Communities are more resilient to natural hazards, including the impacts of climate change, and people are better prepared for the consequences of natural hazard events.	The proposed removal of unsuitable soils, placement of engineered fill and use of appropriately designed foundations will provide for development that is resilient to the identified geotechnical hazards. Torlesse concludes that the residual risks associated with landslips, active faults and liquefaction (including lateral spreading) are low, subject to implementation of the recommended engineering measures.
Policy 51: Avoiding or minimising the risks and consequences of natural hazards – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be avoided or minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to: a) the likelihood and consequences of the range of natural hazards that may adversely affect the subdivision, use or development, including those that may be exacerbated by climate change and sea level rise; and b) whether the location of the subdivision, use or development will foreseeably require hazard mitigation works in the future; and c) the potential for injury or loss of life, social and economic disruption and civil defence emergency management implications – such as access routes to and from the site; and d) whether the subdivision, use or development causes any change in the risks and consequences from natural hazards in areas beyond the application site; and e) minimising effects of the subdivision, use or development on any natural features that may act as a buffer to reduce the impacts from natural hazards; and f) avoiding subdivision, use or development and hazard sensitive activities where the hazards and risks are assessed as high, unless there is a functional or operational need to be located in these areas; and g) appropriate hazard risk management and/or adaptation measures for subdivision, use or development in areas where the hazards and risks are assessed as low to moderate, including an assessment of residual risk; and h) the allowance for floodwater conveyancing in identified overland flow paths and stream corridors; and i) the need to locate floor levels of habitable buildings and buildings used as places of employment above the 1% annual exceedance probability (1:100 year) flood level, in identified flood hazard areas; and j) whether Te Ao Māori or mātauranga Māori provides a broader understanding of the hazards and risk management options.	Torlesse has considered the likelihood and consequences of the identified geotechnical hazards, including liquefaction, lateral spreading, slope instability and settlement. Section 6.6 and Table 17 of the *Geotechnical Assessment Report* assess the residual risks as low, taking account of the proposed engineering measures. The assessment also considers potential effects beyond the Site, including slope stability and settlement effects on adjoining land and infrastructure. Torlesse concludes that these risks can be appropriately managed and are unlikely to be accelerated or worsened by the Proposal. The recommended ground improvement, foundation design and construction measures provide an appropriate response to the identified geotechnical risks, consistent with Policy 51.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
Policy 52: Avoiding or minimising adverse effects of hazard mitigation measures – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to: a) whether nature-based solutions, Mātauranga Māori, soft engineering options provide a more appropriate solution; and b) avoiding hard engineering methods unless it is necessary to protect existing development, regionally significant infrastructure or property from unacceptable risk and the works form part of a hazard risk management strategy that represents the best practicable option for the future; and c) the long-term viability of maintaining a hard engineering approach with particular regard to changing risks from natural hazards over time due to climate change; and d) adverse effects on Te Mana o te Wai, mahinga kai, taonga species, natural processes, and the indigenous ecosystems and biodiversity; and e) sites of significance to mana whenua / tangata whenua, including those identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a district or regional plan; and f) any change in natural hazard risk to nearby areas as a result of changes to natural processes from the hazard mitigation works; and g) the cumulative effects of isolated hard engineering works; and **h)** any residual risk remaining after mitigation works are in place, so that they minimise or do not increase the risks from natural hazards.	The geotechnical implications of the proposed earthworks and ground improvement measures have been assessed by Torlesse, including the stability of the proposed landforms and potential settlement effects on adjoining properties and infrastructure. Torlesse concludes that the proposed engineering measures can be implemented without materially increasing geotechnical hazard risks beyond the Site. The residual risks are assessed as low, subject to the recommended detailed design and construction measures. The wider environmental effects of the proposed earthworks, flood management measures and associated changes to natural processes are addressed separately in the relevant technical assessments.
RESOURCE MANAGEMENT WITH TANGATA WHENUA	
Objective 24 and Policy 28 require that the principles of Te Tiriti o Waitangi are taken into account in decision making. Objective 25 seeks that kaitiakitanga is integrated into decision making. Objective 26 seeks that Mauri is sustained, particularly in water. Objective 28 is to provide for the cultural relationship of Māori with their ancestral lands, water, sites, waahi tapu and other taonga. Policy 49 seeks the implementation of these matters.	
Objective 24: **The principles of Te Tiriti o Waitangi are taken into account in a systematic way when resource management decisions are made.**	The Proposal has involved ongoing engagement with Te Ātiawa, including consideration of the matters raised in the *Interim Cultural Impact Assessment*. Further engagement is continuing. The proposed consent conditions also provide for ongoing mana whenua involvement in ecological restoration and monitoring.
Objective 25: **The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region's natural and physical resources.**	The proposed GWRC consent conditions provide opportunities for Te Ātiawa involvement in the detailed design, implementation and monitoring of the wetland compensation complex, stream enhancements and associated ecological management measures. These arrangements provide a framework for integrating kaitiakitanga into the ongoing management of the Site.
Objective 26: **Mauri is sustained, particularly in relation to coastal and fresh waters.**	The Proposal will result in the loss of existing wetlands and modification of watercourses, with associated concerns regarding mauri identified in the interim *Cultural Impact Assessment*. Proposed measures include retention and enhancement of the Wharemaukū Stream, establishment of an indigenous wetland complex, riparian restoration, stormwater treatment and freshwater monitoring. While these measures are expected to improve ecological conditions, the extent to which they address effects on mauri remains subject to further engagement with Te Ātiawa.
Objective 27: Mahinga kai and natural resources used for customary purposes, are maintained and enhanced, and these resources are healthy and accessible to tangata whenua.	The Proposal incorporates measures intended to support indigenous freshwater habitats and species, including fish passage, riparian restoration, wetland establishment and ongoing ecological monitoring. These measures are expected to contribute to the ecological conditions supporting mahinga kai values, although the extent to which customary use and access aspirations are achieved remains a matter for ongoing engagement with Te Ātiawa.
Objective 28: The cultural relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga is maintained.	The *interim Cultural Impact Assessment* identifies significant cultural associations with the Site's dunes, wetlands and

PROVISION	COMMENT
	Wharemaukū Stream, together with concerns regarding their proposed modification. The Applicant has continued engagement with Te Ātiawa and incorporated measures for freshwater restoration and ongoing mana whenua involvement. However, the cultural effects identified in the assessment or still being discussed with Te Ātiawa.
REGIONAL FORM, DESIGN AND FUNCTION	
Objective 22 - A compact, well-designed, climate-resilient, accessible, and environmentally responsive regional form with well-functioning urban areas and rural areas, where: a) there is sufficient development capacity to meet the needs of current and future generations, improve housing affordability and quality, and provide access to a diversity of housing typologies within neighbourhoods which enable choice; and b) Māori are able to express their culture and traditions, and the relationship of mana whenua / tangata whenua with their culture, ancestral land, water, sites, wāhi tapu and other taonga is provided for; and c) Te Mana o te Wai is given effect to; and d) intensification occurs within existing urban zones in appropriate places where it is environmentally responsive; and e) subdivision, use and development is located, designed, and constructed in a way that is climate-resilient and contributes to reducing greenhouse gas emissions; and f) built environments, including integrated transport infrastructure, meet the health and wellbeing needs of all people, with multi-modal access including active transport, between housing, jobs, community services, centres, green space, and open space; and g) the biophysical characteristics, location, recognised values, capability and limitations of land inform its use and development; and h) the productive capacity of rural land is retained; and i) existing urban-zoned land, and infrastructure capacity is used effectively and efficiently; and j) new or upgraded infrastructure is integrated and sequenced with development; and k) development densities are sufficient to support the provision and ongoing maintenance of infrastructure; and l) a variety of residential, commercial, mixed use and industrial development in appropriate locations is provided which contributes to viable and vibrant centres at a range of scales, and industrial-based employment locations; and m) the safe and efficient operation of regionally significant infrastructure is protected from potential reverse sensitivity effects.	The Regional Form, Design and Function objectives and policies seek to achieve a compact, well designed, and sustainable regional form that achieves good urban design outcomes and integration between land use and transportation. The Proposal is inherently consistent with this objective for the following reasons: • The Proposal will deliver approximately 604 dwellings across a range of typologies, including apartments, townhouses, duplexes and standalone dwellings, contributing to housing supply, choice and affordability. • The Site is zoned Metropolitan Centre Zone and specifically identified for comprehensive urban development. The Proposal represents an efficient use of this land, delivering significant residential and commercial development within an existing urban area. • The integration of residential, large-format retail, commercial and other activities will strengthen the role and function of the Paraparaumu Metropolitan Centre, supporting economic activity, employment and the vitality of the wider town centre. • The Proposal incorporates an interconnected street network, pedestrian and cycling connections and improved accessibility to surrounding employment, retail, community facilities and public transport. • The development has been informed by a comprehensive urban design assessment, with an integrated arrangement of buildings, streets, public open spaces and landscape areas intended to establish a well-functioning and accessible urban environment. • The development layout has been informed by the Site's ecological, landscape, hydrological and flood management characteristics. While existing wetlands and dune landforms will be modified, the Proposal incorporates wetland compensation, enhancement of the Wharemaukū Stream corridor and extensive indigenous planting. • The proposed stormwater management and flood storage infrastructure will manage flood risk, while the compact mixed-use development and active transport connections provide opportunities to reduce reliance on private vehicles. • The Proposal includes the necessary transport and three waters infrastructure to service the development, with infrastructure delivery to be appropriately staged and integrated with development. • Engagement with mana whenua has informed the Proposal, with proposed consent conditions providing for ongoing involvement in ecological management and opportunities to exercise kaitiakitanga. Overall, the Proposal directly contributes to the compact, well-functioning and environmentally responsive urban form sought by Objective 22. The development represents a significant opportunity to realise the planned urban development potential of the Site, increase housing and commercial capacity, and strengthen the role of the Paraparaumu Metropolitan Centre. The Proposal is therefore considered strongly consistent with Objective 22.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
Objective 22A **To achieve sufficient development capacity to meet expected housing demand in the short medium and long term in any tier 1 urban environment within the Wellington Region, the housing bottom lines in Table 9A are to be met or exceeded in the short medium and long term in the tier 1 urban environment.** **Note: Objective 22A and Table 9A were inserted into the Regional Policy Statement directly under section 55(2)(b) of the Resource Management Act 1991, i.e. without reference to RMA Schedule 1, as directed by the NPS-UD.**	The Proposal seeks to enable the development of 593 residential properties. Accordingly, it is a significant project that assist the Regional Council is achieving sufficient development capacity to meet the expected housing demand as set out in Table 9A.
Policy UD.2: Enable Māori to express their culture and traditions – consideration When considering an application for a resource consent, notice of requirement, or a change of a district plan for subdivision, use or development, enable Māori to express their culture and traditions in land use and development by, as a minimum: a) providing for mana whenua / tangata whenua to express their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other taonga; and **b)** recognising taonga and sites and areas of significance, awa and moana and important places where mana whenua / tangata whenua practice Mātauranga Māori, including marae and urupā.	The proposed draft consent conditions provide for ongoing mana whenua involvement in the detailed design and implementation of ecological and landscape measures, including opportunities to incorporate mātauranga Māori and exercise kaitiakitanga. Policy UD.2 seeks to enable Māori to express their culture and traditions through land use and development, rather than requiring the avoidance of all effects on culturally significant features. The Proposal provides opportunities for this through ongoing engagement and involvement in restoration and management measures. While some cultural effects remain unresolved, particularly regarding the dunes and Wharemaukū Stream, the Proposal is considered to respond to the direction of this policy.
Policy 55 - Managing greenfield development to contribute to well-functioning urban areas and rural areas – consideration An application for a resource consent, notice of requirement, or a change, variation or review of a district plan for urban development beyond the region's existing urban zones, will contribute to achieving a compact, well-designed, climate-resilient, accessible and environmentally responsive regional form if: ……	Policy 55 specifically applies to urban development beyond the region's existing urban zones. As the Site is already zoned Metropolitan Centre Zone and identified for comprehensive urban development, the Proposal does not constitute greenfield development beyond an existing urban zone, and the policy is therefore not directly applicable.
Policy UD.5: Contributing to well-functioning urban areas – consideration When considering an application for a resource consent, a notice of requirement, or a change, variation or review of a district plan for urban development, including housing and supporting infrastructure, seek to achieve well-functioning urban areas by: a) providing for the characteristics of well-functioning urban environments, in a way that uses land efficiently; and b) where providing housing, seeks to improve housing affordability, quality and choice and provide a diversity of typologies; and c) providing for safe multi-modal access between housing, employment, services, amenities, green space, and local centres, preferably within walkable catchments and using low and zero-carbon emission transport modes; and d) providing for and protecting mana whenua / tangata whenua values, sites of significance to mana whenua / tangata whenua, and their relationship to their culture, ancestral lands, water, sites, wāhi tapu and other taonga; and e) avoiding or mitigating potential adverse effects, including cumulative effects, of urban development on the natural environment, Policy 42; and f) coordinating development with infrastructure while prioritising, where possible, the effective and efficient use of existing infrastructure; and **g)** protecting the operation and safety of regionally significant infrastructure from potential reverse sensitivity effects.	The Proposal is consistent with Policy UD.5 for the following reasons: • The Proposal will deliver approximately 604 dwellings across a range of typologies, alongside retail, commercial and community activities, making efficient use of land within the Metropolitan Centre Zone. • The development incorporates a connected street network, pedestrian and cycling facilities and connections to surrounding employment, services, public transport and open spaces. • Engagement with mana whenua has informed the Proposal, with cultural effects acknowledged and proposed consent conditions providing for ongoing involvement in detailed design and ecological management. • The Proposal has been informed by comprehensive technical assessments, with wetland compensation, enhancement of the Wharemaukū Stream corridor, stormwater management and ecological measures proposed to manage adverse effects. • The development includes new and upgraded transport and three waters infrastructure, with delivery coordinated with the staging of development and integration with existing networks. • The design has considered the adjoining Kāpiti Expressway and associated NZTA designation, including the relationship between the development and the safe and efficient operation of the wider transport network. Overall, the Proposal will deliver significant housing and commercial capacity within an established urban area, supported by integrated infrastructure, transport connections and open spaces. It is therefore considered strongly consistent with the outcomes sought by Policy UD.5.

TABLE 6: REGIONAL POLICY STATEMENT OBJECTIVES AND POLICIES - APPEALS VERSION SEPTEMBER 2025	
PROVISION	COMMENT
Policy 57: Integrating land use and transportation – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, seek to achieve integrated land use and transport within the Wellington Region by: a) locating development in areas near centres and well-serviced by existing or planned public transport, to minimise private vehicle travel and trip length and maximise mode shift to public transport or active modes; and b) supporting connectivity with, and accessibility to public services or amenities, key centres of employment activity or retail activity via public and active transport networks; and c) supporting a safe, reliable, equitable, inclusive and efficient transport network including through connections with the wider transport network; and d) providing safe and accessible multi-modal transport networks along connected routes that are designed for public and active transport, while recognising that the delivery of public transport services may not always be efficient or practical; and e) supporting and enabling the rapid transport network and the growth corridors in the Wellington Region, including: i. Western Growth Corridor – Tawa to Levin; ii. Eastern Growth Corridor – Hutt to Masterton; iii. Let's Get Wellington Moving Growth Corridor; and **f)** minimising the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.	The Proposal is consistent with Policy 57 for the following reasons: • The Site is located within the Metropolitan Centre Zone, with access to existing employment, retail, community facilities and public transport services. The proposed mix of residential and commercial activities will provide opportunities to reduce trip lengths and reliance on private vehicles. • The Proposal incorporates an interconnected street network, pedestrian and cycling facilities, including the Iver Trask Place extension and connections to the wider transport network. • The Integrated Transport Assessment confirms that the proposed transport network and associated intersection improvements will accommodate anticipated development demands while providing for safe and efficient access. • The Proposal supports urban growth within the Western Growth Corridor, making efficient use of existing urban-zoned land and supporting infrastructure. • The Proposal has been designed having regard to the adjoining Kāpiti Expressway and associated designation, including the need to maintain the safe and efficient operation of the wider transport network. Overall, the Proposal will deliver significant residential and commercial development in an accessible location, supported by integrated transport infrastructure and opportunities for increased walking, cycling and public transport use.
Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, seek to achieve development that is integrated with infrastructure, in a way that: makes effective, efficient and safe use of existing infrastructure capacity; and makes provision for the development, funding, implementation and operation of infrastructure serving the area in question; and all infrastructure required to serve new development is available or is able to be delivered in a timeframe appropriate to service the development, and this may require timing or staging development accordingly.	The Proposal has been informed by detailed infrastructure assessments and engagement with KCDC, GWRC and relevant infrastructure providers to ensure that the development can be appropriately serviced. The Proposal includes new and upgraded water supply, wastewater, stormwater and transport infrastructure, designed to integrate with existing networks and accommodate the anticipated development demands. The proposed infrastructure will be delivered in conjunction with the development, with consent conditions providing for detailed engineering design, necessary approvals and the appropriate staging of infrastructure works.
SOILS AND MINERALS	
Objective 29: Land management practices do not accelerate soil erosion. **Objective 30: Soils maintain those desirable physical, chemical and biological characteristics that enable them to retain their ecosystem function and range of uses.** **Policy 41:** When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to controlling earthworks and vegetation disturbance to minimise: (a) erosion; and (b) silt and sediment runoff into water, or onto or into land that may enter water, so that healthy aquatic ecosystems are sustained.	The Proposal involves substantial earthworks and vegetation clearance to facilitate the development, including modification of existing dune landforms. These works will be managed through the implementation of an Erosion and Sediment Control Plan, incorporating measures to minimise soil erosion, sediment runoff and associated effects on receiving environments, particularly the Wharemaukū Stream. The proposed consent conditions require the implementation, monitoring and maintenance of erosion and sediment control measures throughout construction, together with progressive stabilisation of disturbed areas. These measures will minimise soil loss and protect the health of downstream aquatic ecosystems.

7. NATIONAL POLICY STATEMENT FOR URBAN DEVELOPMENT

The following provisions are not discussed in the table below as:

- Objective 7 as it relates to the requirement for local authorities to have robust and frequently updated information.
- Policies 4 and 8 are not applicable as they relates specifically to plan changes.
- Policy 5 is not applicable as it applies to a Tier 2 or 3 urban environments. Kāpiti is identified as a Tier 1 urban environment.
- Policy 7 relates specifically to housing bottom lines to be set by local authorities and is not directed at applicants.
- Policy 9 is directed at Council decision making processes including through plan development.
- Policy 11 is specific to car parking, requiring that tier 1-3 local authorities do not set minimum car parking rates in their District Plans.

TABLE 7: NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT

PROVISION	COMMENT
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The Proposal will provide for a comprehensive mixed-use extension to the existing Paraparaumu Metropolitan Centre, comprising approximately 604 dwellings, 20,000m² of large-format retail and 3,800m² of specialty retail and commercial floorspace, together with supporting infrastructure, open space and ecological enhancement. The *Economic Assessment* identifies the Site as one of the few remaining opportunities to expand the District's primary centre in a coordinated and efficient manner. The integration of housing, employment, retail and services will improve accessibility, support local economic activity and strengthen the role and function of the Paraparaumu town centre. The Proposal will also provide an integrated transport network, including pedestrian and cycling connections, together with stormwater management, flood storage, wetland compensation and stream enhancement. Overall, the Proposal will contribute to a well-functioning urban environment and enable people and communities to provide for their social and economic wellbeing.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The Proposal will increase housing supply and choice within Paraparaumu through the provision of approximately 604 dwellings, including standalone dwellings, duplexes, terrace housing and apartments. The Economic Assessment identifies that the Proposal will increase the District's estimated greenfield housing capacity from approximately 6.2 years to 8.7 years, making a significant contribution towards meeting medium-term housing demand. Importantly, the proposed dwellings are expected to achieve an average sale price of approximately $810,000, compared with approximately $930,000 for recent new-build dwellings across the District. This represents an estimated 13% improvement in affordability relative to the wider new-build market. The Proposal will therefore increase housing capacity, improve housing choice and support greater competition and affordability within the District's housing market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: **a) the area is in or near a centre zone or other area with many employment opportunities**	The Site is located within the Paraparaumu Metropolitan Centre, immediately adjoining Coastlands and the wider town centre. The Economic Assessment identifies the Site as a strategically important opportunity to accommodate additional residential and commercial development in a central and accessible location. The Proposal will provide approximately 593 dwellings alongside substantial retail and commercial floorspace, enabling more people to live and work within the Metropolitan Centre. The co-location of these activities will improve access to

TABLE 7: NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT	
PROVISION	COMMENT
b) the area is well-serviced by existing or planned public transport **c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.**	employment, goods and services, while supporting the vitality and economic performance of the existing centre. The Site is also accessible to existing public transport services, with the Proposal providing additional road, pedestrian and cycling connections to the surrounding urban area. The Proposal is therefore strongly consistent with Objective 3.
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The Proposal will result in a significant change to the existing character of the Site as it transitions from largely undeveloped land to a comprehensive mixed-use urban environment. However, this change is anticipated by the Metropolitan Centre Zone and associated Structure Plan. The *Economic Assessment* identifies that the Site represents one of the few remaining opportunities for a coordinated expansion of the Paraparaumu town centre. It also identifies the risk that fragmented or suboptimal development could result in the loss of significant economic, social and urban form benefits. The Proposal responds to this through a comprehensive masterplanned development incorporating residential, commercial and retail activities, integrated infrastructure, open space and ecological enhancement. The resulting change in character is consistent with the planned urban development of the Site and will contribute to the evolving needs of the Paraparaumu community.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	Objective 5 is directed at planning decisions and requires decision-makers to take into account the principles of Te Tiriti o Waitangi. The Applicant has undertaken engagement with mana whenua, including Te Ātiawa and Puketapu Hapū. The *interim Cultural Impact Assessment* identifies cultural values associated with the Site and concerns regarding aspects of the Proposal, particularly the dunes and Wharemaukū Stream. The engagement undertaken, cultural assessments and proposed arrangements for ongoing mana whenua involvement provide a basis for the decision-maker to consider these matters when assessing the Proposal against Objective 5. The outstanding concerns identified by Te Ātiawa will also need to be taken into account as part of that assessment.
Objective 6: Local authority decisions on urban development that affect urban environments are: **a) integrated with infrastructure planning and funding decisions; and** **b) strategic over the medium term and long term; and** **c) responsive, particularly in relation to proposals that would supply significant development capacity.**	The proposal provides for the development of a large Metropolitan Centre Zone site and has been planned together with the transport network, three waters infrastructure, flood management, stormwater systems, open space, ecological works and landscape outcomes required to support that development. It responds to the outcomes anticipated by the Metropolitan Centre Zone Structure Plan, including the provision of the Link Road and improved connections to the existing town centre. The Proposal will also provide a substantial amount of additional housing and business development capacity within the existing urban area. The integrated approach to land use, infrastructure and environmental management is therefore consistent with the strategic and responsive decision-making sought by Objective 6.
Objective 8: New Zealand's urban environments: **a) support reductions in greenhouse gas emissions; and** **b) are resilient to the current and future effects of climate change.**	The proposal supports a more compact and mixed-use urban form by locating substantial new housing, employment, retail and services within and adjoining the existing Metropolitan Centre. The Site is close to existing bus and rail services and the Proposal includes a network of walking and cycling connections, providing opportunities for future residents, workers and visitors to reduce reliance on private vehicle travel. Flood risk and climate change have also been key considerations in the design of the Proposal. The proposed earthworks, development platforms, stormwater infrastructure, wetland areas and stream works have been designed together to maintain appropriate flood conveyance and storage and to manage flood effects within and beyond the Site.
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: a) have or enable a variety of homes that: i. meet the needs, in terms of type, price, and location, of different households; and ii. (ii) enable Māori to express their cultural traditions and norms; and	The proposal is consistent with Policy 1 as it provides a range of housing typologies and densities to accommodate different households, together with land and buildings suitable for large-format retail, specialty retail, commercial, service and community activities. Housing, employment, shops, services, community facilities and open space will be connected through an integrated transport network providing for vehicles, pedestrians and cyclists, with the Site also having access to existing public transport services. The Proposal integrates ecological maintenance, enhancement and offsetting within stormwater management, flood storage, and open space within the wider

TABLE 7: NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT	
PROVISION	COMMENT
b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and e) support reductions in greenhouse gas emissions; and f) are resilient to the likely current and future effects of climate change	masterplan, rather than treating these as separate elements. It also provides opportunities for continued mana whenua involvement through detailed design. Taken together, these elements will contribute to the well-functioning urban environment sought by Policy 1.
Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	The Proposal will realise substantial residential and business development capacity on land already zoned for urban development within the Metropolitan Centre Zone. 593 dwellings are proposed, together with large-format retail, specialty retail and other commercial and community activities. The *Economic Assessment* identifies that the residential component will increase the District's greenfield housing capacity and make a meaningful contribution towards meeting medium-term housing demand. The proposal will therefore assist in providing sufficient realisable development capacity for both housing and business land in an appropriate and already planned urban location
Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable: a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and c) building heights of at least 6 storeys within at least a walkable catchment of the following: (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.	The Site is located within the Metropolitan Centre Zone, where the District Plan enables a greater scale and height of development than is proposed as part of the Project. While the Proposal does not seek to maximise the theoretical development capacity enabled by the District Plan, it will nevertheless provide a substantial increase in residential density and a mixed-use form of development appropriate to its Metropolitan Centre location. The residential component includes a range of housing typologies and densities, including apartments and higher-intensity development within the Town Centre Precinct. The scale and distribution of development has been informed by the masterplanning process, having regard to the existing and anticipated future context of the surrounding area, the relationship with the existing Paraparaumu town centre, site constraints and the need to deliver a development that is commercially feasible and capable of being implemented. In this respect, the proposal represents an appropriate response to Policy 3. The policy direction to enable greater building heights and density does not require development to maximise the height or theoretical yield enabled by the District Plan. Rather, the Proposal makes efficient use of a highly accessible Metropolitan Centre Zone site and provides a substantial level of intensification, while balancing this against the Site's context and the practical feasibility of delivering the development.
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)	The Proposal has been developed having regard to the planned urban form anticipated by the District Plan and Metropolitan Centre Zone Structure Plan. While the District Plan enables a greater scale and intensity of development, the Proposal will nevertheless provide a substantial increase in residential and commercial activity within the Metropolitan Centre. The *Economic Assessment* identifies significant benefits arising from the comprehensive development of the Site, including: The *Economic Assessment* further identifies that comprehensive wetland avoidance would materially affect the scale, configuration and integrated function of the development, with consequential effects on housing capacity, commercial activity and the wider economic benefits of the Proposal. These considerations are relevant when assessing the benefits of urban development alongside the Site's environmental constraints. • Approximately 593 additional dwellings, increasing estimated greenfield housing capacity from 6.2 to 8.7 years. • Improved housing choice and affordability, with average dwelling prices estimated to be approximately 13% below the wider new-build market.

TABLE 7: NATIONAL POLICY STATEMENT ON URBAN DEVELOPMENT	
PROVISION	COMMENT
d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity e) the likely current and future effects of climate change.	• Additional retail and commercial capacity that will strengthen the existing town centre, reduce expenditure leakage and support local employment. • A significant economic contribution, including approximately $313.3 million in direct and indirect construction-related GDP and approximately 1,765 FTE jobs over the development period. • An estimated $48.8 million in annual GDP generated through the ongoing operation of the retail and commercial activities. • The development will also result in substantial changes to the existing character and amenity of the Site. However, its transition to a mixed-use urban environment is anticipated by the planning framework and is not, of itself, an adverse effect. Flood risk and climate change have also been incorporated into the development design through the proposed stormwater and flood management infrastructure. Overall, the Proposal is considered strongly consistent with Policy 6, particularly the direction to recognise the benefits of urban development and the contribution of development to meeting housing and business capacity requirements.
Policy 10: Tier 1, 2, and 3 local authorities: a) that share jurisdiction over urban environments work together when b) implementing this National Policy Statement; and c) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and d) engage with the development sector to identify significant opportunities for urban development.	The Proposal provides for an integrated approach to land use and infrastructure planning, with residential, retail and commercial development supported by new and upgraded transport and three waters infrastructure, stormwater management, flood storage and active transport connections. Key transport components include the Link Road connecting Kāpiti Road/Arawhata Road with Ihakara Street, the extension of Iver Trask Place and new pedestrian and cycling connections. These improvements will support accessibility between the Site, the existing town centre and surrounding urban area. The *Economic Assessment* identifies the importance of delivering the Site as a comprehensive masterplanned development, with housing, employment, retail and services integrated to maximise the benefits of its strategic location. The development of the masterplan has also involved ongoing engagement with KCDC, GWRC and relevant infrastructure providers, including consideration of infrastructure capacity and the delivery of necessary upgrades. Overall, the Proposal supports the integrated land use and infrastructure planning outcomes sought by Policy 10.

8. NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

TABLE 8: NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY	
REQUIREMENT	COMMENT
1 Objective **(1) The objective of this National Policy Statement is:** **(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and** **(b) to achieve this:** **(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and** **(ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and** **(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and**	The proposal is considered to be consistent with the objective of the NPS-IB. As outlined in the *Ecological Impact Assessment*, the Site does not contain any identified SNAs and the terrestrial habitats are predominantly highly modified exotic grassland and scrubland, with ecological values assessed as negligible to low. While development will result in the removal of much of this existing habitat, the Proposal includes substantial indigenous planting and ecological enhancement associated with the Wharemaukū Stream corridor, wetland margins and other open space areas. Potential effects on indigenous fauna will also be managed through species-specific measures, including lizard and avifauna management. The *Ecological Impact Assessment* concludes that, following implementation of the recommended management and enhancement measures, the Proposal has the potential to achieve a net gain in terrestrial ecological values across the Site. Overall, the Proposal will maintain and enhance terrestrial indigenous biodiversity while providing for the social and economic wellbeing associated with development of the Site.

TABLE 8: NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY	
REQUIREMENT	COMMENT
(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.	
Policy 1: Indigenous biodiversity is managed in a way that gives effect to the decision making principles and takes into account the principles of the Treaty of Waitangi.	The Proposal will replace areas of highly modified exotic vegetation with a more extensive and connected network of indigenous planting associated with the Wharemaukū Stream corridor, wetland margins and wider landscape areas. This will improve terrestrial habitat extent, quality and connectivity and contribute to a more resilient ecological network across the Site. To the extent that this planting is associated with natural inland wetlands, the detailed management of effects on those wetlands is addressed primarily under the NPS-FM rather than the NPS-IB.
Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: a) managing indigenous biodiversity on their land; and b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and c) (c) actively participating in other decision-making about indigenous biodiversity.	Policy 2 is principally directed at the way in which local authorities provide for tangata whenua involvement in the management of indigenous biodiversity. Notwithstanding this, the Applicant has engaged with Te Ātiawa ki Whakarongotai in relation to the development of the Proposal and intends to continue that engagement through detailed design and implementation. In particular, the stream, ecological restoration and landscape components of the Proposal provide opportunities for mana whenua to exercise kaitiakitanga and to influence the ecological outcomes achieved through the Project.
Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	There is nothing in the *Ecological Impact Assessment* prepared by Bioresearches to indicate that the effects of the proposal on indigenous biodiversity will be uncertain, unknown, or little understood. As such a precautionary approach is not required to be taken.
Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.	The ecological values of the Site have been subject to a substantial level of investigation, including terrestrial habitat assessments and targeted surveys for indigenous fauna. Accordingly, the ecological values of the Site and the likely effects of its development are well understood. A precautionary approach has nevertheless been adopted where some uncertainty remains. In particular, despite extensive targeted surveys detecting no native lizards, the *Ecological Impact Assessment* recognises that their presence cannot be completely excluded and recommends implementation of a Lizard Management Plan. The targeted lizard assessment involved 192 individual ACO inspections together with visual encounter and habitat searches, with no native or exotic lizards detected. Similarly, appropriate management is proposed for indigenous birds during vegetation clearance. The approach to the Proposal is therefore consistent with Policy 3.
Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.	The Site does not contain any areas identified as an SNA in the District Plan. The *Ecological Impact Assessment* confirms that the terrestrial vegetation within the Site is predominantly exotic grassland and exotic scrubland and that these habitats have negligible to low ecological value. Accordingly, this policy does not give rise to any particular issue for the Proposal.
Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	There are no identified SNAs within the Site and as such, the Proposal does not involve the loss or modification of any SNA. Accordingly, the specific provisions of the NPS-IB relating to the management of adverse effects on SNAs are not applicable to the Proposal. Effects on terrestrial indigenous biodiversity outside SNAs are nevertheless addressed through the ecological management and enhancement measures proposed as part of the Project.
Policy 9: Certain established activities are provided for within and outside SNAs.	This policy is not directly relevant to the Proposal, which comprises new subdivision, land use and development rather than an established activity relying on the provisions of the NPS-IB relating to established activities.
Policy 10: Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	The Proposal will provide for substantial social and economic benefits through the comprehensive development of the Site for housing, retail, commercial and associated activities. These benefits are being provided alongside measures to appropriately manage effects on terrestrial indigenous biodiversity. The *Ecological Impact Assessment* outlines that the existing terrestrial habitats are predominantly highly modified and of negligible to low ecological value, while the proposed indigenous planting and ecological restoration will establish areas of higher habitat value and improved ecological connectivity. The *Ecological Impact Assessment* concludes that, following implementation of the proposed management and enhancement measures, the Proposal can achieve a net gain in terrestrial ecological values across the Site. The Proposal therefore provides for urban development and its associated social and economic benefits while maintaining and enhancing indigenous biodiversity.
Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.	Not applicable

TABLE 8: NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY	
REQUIREMENT	COMMENT
Policy 12: Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.	Not applicable
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	The proposal will provide for substantial restoration and enhancement of terrestrial indigenous biodiversity through indigenous planting associated with the Wharemaukū Stream corridor, open space areas and the new hill landform. The existing terrestrial vegetation is predominantly exotic and of negligible to low ecological value. Once established, the proposed indigenous planting is expected to provide higher-value habitat for indigenous fauna and improve ecological connectivity across the Site. The *Ecological Impact Assessment* considers that the proposed planting will, once established, have greater ecological value than the exotic grassland and scrubland being removed and will contribute to a net gain in terrestrial ecological value. Where restoration is associated with natural inland wetlands, the management of those wetland effects is principally addressed under the NPS-FM
Policy 14: Increased indigenous vegetation cover is promoted in both urban and nonurban environments.	The Proposal is consistent with Policy 14. Substantial areas of indigenous vegetation will be established through the proposed riparian, landscape and ecological restoration planting. This will increase the extent, quality and connectivity of indigenous vegetation within what is presently a highly modified urban-fringe environment. The proposed planting will also provide improved shelter, food resources and nesting habitat for indigenous fauna. To the extent that planting is associated with natural inland wetlands, the relevant wetland effects and management are addressed primarily through the NPS-FM assessment.
Policy 15: Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	The *Ecological Impact Assessment* included targeted consideration of avifauna and bats, including desktop investigations and field surveys. The Site has been assessed as having moderate ecological value for avifauna. New Zealand pipit was observed foraging within the Site and the existing grassland and scrubland may provide some nesting habitat. Potential effects during vegetation clearance will be managed by avoiding vegetation clearance during the bird breeding season as far as practicable or, where this cannot be achieved, undertaking pre-clearance nesting surveys and associated nest protection measures. Targeted acoustic bat surveys were also undertaken across the Site over the 2024/2025 summer period. No bats were detected and the *Ecological Impact Assessment* considers there to be a very low likelihood of bats occurring on the Site. Accordingly, specific bat management measures are not included in the Proposal.
Policy 16: Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.	This policy is principally directed at the preparation and implementation of regional biodiversity strategies by local authorities and is not directly applicable to the assessment of the Proposal.
Policy 17: There is improved information and regular monitoring of indigenous biodiversity.	A substantial body of ecological information has been collected for the Site, including terrestrial vegetation assessments, bird observations and targeted surveys for lizards and bats. The lizard assessment included 192 individual ACO inspections together with visual encounter and habitat searches. Despite this survey effort, no native or exotic lizards were detected, although a precautionary approach continues to be taken through the proposed Lizard Management Plan. Targeted acoustic bat monitoring was also undertaken using five Automatic Bat Monitors across the Site during the 2024/2025 summer period. This information has informed the assessment of ecological values and the management measures proposed as part of the Project. Ongoing monitoring and management will also form part of the ecological restoration and fauna management measures where required.
3.10 Managing adverse effects on SNAs of new subdivision, use, and development (1) This clause applies to any new subdivision, use, or development that is in, or affects, an SNA, except as provided in: …….	Clause 3.10 applies to new subdivision, use or development that is in, or affects, an SNA. There are no identified SNAs within the Site and the Proposal does not affect an identified SNA. Accordingly, clause 3.10 is not applicable to the Proposal.

9. NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

TABLE 9: NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT	
REQUIREMENT	COMMENT
Objective (1) **The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:** **(a) first, the health and well-being of water bodies and freshwater ecosystems** **(b) second, the health needs of people (such as drinking water)** **(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.**	The Proposal has been developed having regard to this hierarchy, with freshwater values and effects considered throughout the masterplanning process. In particular: • The Proposal retains the Wharemaukū Stream within its existing alignment and provides for its enhancement through riparian planting and associated ecological management. While the Proposal will result in the reclamation of existing wetlands, the effects have been assessed through the *Ecological Impact Assessment* and *Wetland Residual Effects Analysis*, with a new indigenous wetland complex proposed as compensation for residual effects. The development also incorporates stormwater treatment, flood storage, erosion and sediment controls and ongoing ecological monitoring and management. • The Proposal incorporates the necessary water supply and wastewater infrastructure to service the development, together with stormwater management measures intended to protect receiving environments and manage flood risk. • The Proposal will provide approximately 604 dwellings, substantial retail and commercial development, employment opportunities and supporting infrastructure within the existing Metropolitan Centre, contributing to housing supply, economic activity and the wider wellbeing of the community. Importantly, the social and economic benefits of the Proposal are not relied upon as a substitute for managing adverse effects on freshwater ecosystems. Rather, the Proposal seeks to address freshwater effects through its design, proposed compensation and management measures, while enabling the remaining land resource to contribute to the planned urban development of Paraparaumu. Overall, the Proposal is considered to appropriately respond to the hierarchy of obligations established by Objective 1, subject to the detailed assessment of the relevant policies below.
Policy 1: Freshwater is managed in a way that gives effect to Te Mana o te Wai	This policy acknowledges and supports the protection of the mauri of the water and provides for the health of the environment, waterbodies and people. It requires regional councils to recognise that all decisions made about freshwater management should put the health and well-being of the water at the forefront of that decision. The NPS-FM specifies that Policy 1 is given effect to by Regional Councils through engagement with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region. Policy 1 is therefore not directly applicable to the proposal.
Policy 2: Tangata Whenua are actively involved in freshwater management (Including decision – making processes), and Maori freshwater values are identified and provided for.	This policy requires regional councils to involve iwi/hapū in the management of fresh water and work with them to identify their values and interests and reflect those values and interests in decision-making. Te Ātiawa is also engaging with the Applicant, KCDC and GWRC to consider opportunities for further stream naturalisation and restoration. The proposed consent conditions provide for ongoing mana whenua involvement in freshwater restoration and monitoring. These arrangements support active tangata whenua participation and provide a basis for Māori freshwater values to be considered through the decision-making process.
Policy 3: Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects of receiving environments.	Part 3 of the NPS-FM, 'Implementation', notes in respect of integrated management that: *Adopting an integrated approach, ki uta ki tai, as required by Te Mana o te Wai, requires that local authorities must:* *(a) recognise the interconnectedness of the whole environment, from the mountains and lakes, down the rivers to hāpua (lagoons), wahapū (estuaries) and to the sea; and* *(b) recognise interactions between freshwater, land, water bodies, ecosystems, and receiving environments; and* *(c) manage freshwater, and land use and development, in catchments in an integrated and sustainable way to avoid, remedy, or mitigate adverse effects, including cumulative effects, on the health and well-being of water bodies, freshwater ecosystems, and receiving environments; and* *(d) encourage the co-ordination and sequencing of regional or urban growth.* Sub policy 3.5.(4) that requires that: *Every territorial authority must include objectives, policies, and methods in its district plan to promote positive effects, and avoid, remedy, or mitigate adverse effects (including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.* While Policy 3 and the associated implementation requirements are primarily directed at local authorities, the Proposal has been designed and assessed having regard to the interconnected relationship between land use, freshwater ecosystems and the wider receiving environment. In particular, the Proposal adopts an integrated approach to earthworks, stormwater management, flood storage and ecological management, recognising that changes within the Site have the potential to affect the Wharemaukū Stream and downstream receiving environments. The *Hydrological Effects Assessment* has also considered the relationships between the existing wetlands, shallow groundwater, surface water drainage and the Wharemaukū Stream, including the changes associated with the proposed earthworks, modification of

TABLE 9: NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT	
REQUIREMENT	COMMENT
	ground levels and establishment of new drainage and stormwater infrastructure. These considerations have informed the integrated design of the development, including the proposed wetland complex. The following is noted: • The proposed stormwater system incorporates treatment, attenuation and flood storage to manage runoff generated by the development, including potential effects on downstream water bodies and the wider catchment. • The proposed earthworks will be undertaken in accordance with draft ECMP, with measures to minimise sediment discharges to the Wharemaukū Stream and downstream receiving environments during construction. • The Wharemaukū Stream will be retained within its existing alignment and enhanced through riparian planting and ecological management. While existing wetlands will be reclaimed, the Proposal incorporates a new indigenous wetland complex as compensation for residual ecological effects, together with ongoing monitoring and management. The wetland has been designed to receive water from the realigned Watercourse 1 and the eastern part of the Site, with ground levels and water supply arrangements intended to establish suitable inundation and saturation conditions for a range of indigenous wetland habitats. • Stormwater management, flood storage, open space and development infrastructure have been considered together as part of the wider masterplan, rather than as separate or isolated components. • The proposed wetland complex will be subject to ongoing ecological and hydrological monitoring, maintenance and adaptive management to support its establishment and long-term functioning, including monitoring of groundwater levels to assess whether the intended hydrological conditions are being achieved. The Proposal therefore recognises the relationship between land use activities and freshwater environments, including the potential for effects to extend beyond the Site. The integrated design approach, informed by the hydrological and ecological assessments and supported by the proposed management and monitoring measures, is intended to address these effects at both the Site and receiving-environment level, consistent with the approach sought by Policy 3.
Policy 4: Freshwater is managed as part of New Zealand's integrated response to climate change.	The Proposal has been designed having regard to the anticipated effects of climate change, particularly increased rainfall intensity and associated flood risk within the Wharemaukū Stream catchment. Stormwater management and flood mitigation have been key considerations in the development of the masterplan, with substantial flood storage incorporated into the Site. In particular, the proposed indigenous wetland complex will also provide a secondary flood storage function, integrating freshwater management, ecological compensation and climate change adaptation. The proposed stormwater infrastructure, including detention areas, pipe networks and secondary overland flow paths, has been designed to accommodate anticipated future rainfall and flood conditions, including appropriate allowances for climate change. These measures are intended to manage runoff from the developed Site and avoid exacerbating flood risk within the wider catchment. The Proposal also provides for the enhancement of the Wharemaukū Stream corridor through riparian planting and associated ecological management, contributing to the resilience of the freshwater environment.
Policy 5: Freshwater is managed through a National Objectives Framework to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	This policy is not considered to be directly relevant to the proposal itself. The policy requires regional councils to go through a comprehensive process of identifying Freshwater Management Units (FMUs), identify their values, set environmental outcomes for each value and include them as objectives in regional plans, identify attributes for each value and set baseline states for those attributes, set target attribute states, environmental flows and levels, and other criteria to support the achievement of environmental outcomes, set limits as rules and prepare action plans to achieve environmental outcomes. Notwithstanding that the policy is not directly applicable, it is noted that the potential effects on the wetlands will be appropriately addressed in the resource consent application through the effects management hierarchy where appropriate offsets will be included in the final proposal.
Policy 6: There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	The Proposal will result in the reclamation of approximately 5.33ha of existing natural inland wetlands. However, importantly, the Proposal also provides for the creation of a new indigenous wetland complex within the Site, with the intention of achieving no overall net loss of wetland extent and a net gain in ecological values. As outlined in the *Wetland Residual Effects Analysis*, the existing wetlands are predominantly exotic pastoral wetlands, comprising low-growing grasses, herbs and rushes, with indigenous vegetation representing approximately 20% of vegetation cover. The wetlands have been assessed as having low to moderate ecological values. Notwithstanding their modified condition, the loss of these wetlands has been assessed as resulting in moderate to high residual adverse ecological effects, requiring further management through the effects management hierarchy. The following is of relevance to assessment against this policy: • The Proposal provides for the creation of approximately 5.44ha of new indigenous wetland habitat to compensate for the loss of approximately 5.33ha of existing wetlands. Accordingly, the proposed wetland

TABLE 9: NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT	
REQUIREMENT	COMMENT
	creation exceeds the extent of wetland loss and is intended to ensure that there is no overall net loss of wetland extent within the Site. • The proposed wetland complex will comprise a mosaic of indigenous wetland habitats, including shallow water, marsh, swamp and seasonally inundated areas, supported by indigenous planting. The *Wetland Residual Effects Analysis* has applied the Biodiversity Compensation Model to quantify the anticipated ecological gains relative to the losses. The model predicts a compensation score 28.5% higher than the impact score, exceeding the 10% threshold identified in the assessment for a net positive outcome. • Rather than retaining the existing fragmented pastoral wetlands in their current condition, the Proposal will establish a larger, interconnected indigenous wetland complex adjoining the Wharemaukū Stream corridor. This provides opportunities to establish a more diverse range of wetland habitats, improve ecological connectivity and support indigenous biodiversity within the wider catchment. • The proposed wetland compensation has also been informed by the *Hydrological Effects Assessment,* which considers the existing groundwater and surface water conditions and the hydrological requirements of the proposed wetland complex. The wetland has been designed to receive water from the realigned Watercourse 1 and the eastern part of the Site, with ground levels and water supply arrangements intended to establish suitable inundation and saturation conditions for the proposed wetland habitats. These considerations are important to ensuring that the proposed wetland can establish and function as intended over the longer term. • The proposed wetland complex will be subject to ecological and hydrological monitoring, maintenance and adaptive management requirements to support successful establishment and achievement of the predicted ecological outcomes. This includes groundwater level monitoring to assess whether the intended hydrological conditions are being achieved, with provision for remedial measures where necessary. • The proposed wetland complex will be subject to ecological management, monitoring, maintenance and adaptive management requirements to support successful establishment and the achievement of the predicted ecological outcomes. • The Proposal has been informed by consideration of practicable alternatives to wetland reclamation. As outlined in the *Urban Design Assessment* and *Economic Assessment*, the existing wetlands are dispersed throughout the Site, and their retention would materially constrain the integrated urban structure, transport connections, residential development capacity and commercial activities anticipated within the Metropolitan Centre Zone. The engineering assessment also identifies that surrounding earthworks, filling and drainage could alter the shallow groundwater and surface water conditions supporting retained wetlands, such that physical retention would not necessarily maintain their existing hydrological and ecological functions. • The *Wetland Residual Effects Analysis* concludes that the proposed creation of new wetland habitat will ensure no net loss of wetland extent and values within the Site and local area. The proposed compensation is therefore not limited to replacing the physical area of wetlands lost, but is specifically intended to deliver improved ecological values through the establishment of a substantial indigenous wetland complex. • The Proposal is also being advanced through the specific consenting pathway provided under the NES-F for specified urban development affecting natural inland wetlands. This requires consideration of the relevant tests and application of the effects management hierarchy, including compensation for residual adverse effects where appropriate. Overall, while the Proposal will result in the loss of existing natural inland wetlands, this needs to be considered alongside the proposed creation of a greater extent of indigenous wetland habitat and the predicted net gain in ecological values. The hydrological assessment and proposed monitoring provide further support for the establishment and long-term functioning of the compensation wetland. On this basis, and subject to the successful implementation of the proposed compensation and management measures, the Proposal is considered to achieve the broader outcomes sought by Policy 6 in terms of maintaining overall wetland extent and improving ecological values.
Policy 7: The loss of river extent and values is avoided to the extent practicable.	No stream reclamation is proposed.
Policy 8: The significant values of outstanding water bodies are protected.	Not applicable
Policy 9: The habitats of indigenous freshwater species are protected.	The Proposal has been informed by the *Ecological Impact Assessment*, which identifies the existing freshwater habitats and indigenous species present within the Site and assesses the potential effects of the proposed development. While the Proposal will result in the loss of existing wetland habitats and modification of artificial watercourses, measures are proposed to manage the associated effects on indigenous freshwater species and their habitats. In particular:

TABLE 9: NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT	
REQUIREMENT	COMMENT
	• The Wharemaukū Stream will be retained within its existing alignment and enhanced through naturalisation, indigenous riparian planting and ongoing ecological management. These works will improve the quality of the stream corridor and provide opportunities to enhance habitat for indigenous freshwater species. • The Proposal includes the creation of approximately 5.44ha of indigenous wetland habitat to compensate for the loss of existing wetlands. The new wetland complex will provide a more diverse range of freshwater habitats and improve ecological connectivity within the Site. • The *Ecological Impact Assessment* identifies measures to manage potential effects on indigenous freshwater fauna, including fish recovery and relocation prior to works affecting aquatic habitats, together with appropriate construction management measures. • Erosion and sediment controls, stormwater treatment and associated management measures will minimise the potential for sediment and contaminant discharges to affect freshwater habitats during construction and operation. • The draft consent conditions provides for monitoring, maintenance and adaptive management to support the successful establishment of the new wetland habitat and associated ecological outcomes. • The *Wetland Residual Effects Analysis* also demonstrates that, following implementation of the proposed compensation measures, the Proposal is predicted to achieve a net gain in wetland ecological values. Overall, while existing freshwater habitats will be modified or lost, the Proposal incorporates measures to protect indigenous freshwater species during construction and establish new and enhanced habitats over the longer term.
Policy 13: The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.	While this policy is primarily directed at regional council monitoring responsibilities, the Proposal includes an ecological monitoring programme secured through the proposed consent conditions. This will monitor the establishment and performance of the wetland compensation complex and associated freshwater restoration measures, with performance measures and adaptive management requirements to address any identified deficiencies. These measures will contribute to the ongoing monitoring and management of freshwater ecosystem health.
Policy 14: Information (including monitoring date) about the state of water bodies and freshwater ecosystem, and the challenges to their health and well-being, is regularly reported on and published.	The proposed consent conditions require monitoring of the wetland compensation complex and associated freshwater restoration measures, with results reported to the relevant Councils. This information will assist in evaluating the effectiveness of the proposed measures and identifying any further management responses required, consistent with the monitoring and reporting outcomes sought by Policy 14.
Policy 15: Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with National Policy Statement.	The Proposal will make a significant contribution to the social and economic wellbeing of the Kapiti Coast community through the comprehensive development of a strategically located Metropolitan Centre Zone site. As outlined in the *Economic Assessment*, the Proposal will deliver approximately 604 dwellings across a range of housing typologies, increasing the District's estimated greenfield housing capacity from 6.2 to 8.7 years. The proposed dwellings are also expected to be approximately 13% more affordable than the wider new-build market, improving housing choice and affordability. Beyond the direct and in-direct economic benefits, the Proposal will provide an integrated urban environment incorporating housing, employment, open space, recreational opportunities and improved pedestrian and cycling connections, supporting the wider wellbeing of the community. Importantly, these outcomes will be delivered alongside measures to manage freshwater effects, including enhancement of the Wharemaukū Stream, stormwater treatment and flood management, and the creation of a new indigenous wetland complex. As outlined in the Wetland Residual Effects Analysis, the proposed compensation is intended to achieve no overall net loss of wetland extent and a predicted net gain in ecological values. Overall, the Proposal will deliver substantial social and economic benefits while incorporating measures to manage freshwater effects in accordance with the applicable NPS-FM provisions. It is therefore considered consistent with Policy 15.

10. NATIONAL POLICY STATEMENT FOR NATURAL HAZARDS 2025

TABLE 10: NATIONAL POLICY STATEMENT FOR NATURAL HAZARDS

PROVISION	COMMENT
(1) Objective **Natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach.**	The *Geotechnical Assessment Report* adopts a risk-based approach to assessing geotechnical hazards associated with the Proposal. Torlesse concludes that, subject to the recommended engineering measures, the identified geotechnical hazards present a low risk to the proposed development and adjoining land and infrastructure. The *Flood Risk Assessment* also adopts a risk-based approach, considering flood likelihood, consequences and residual risk in accordance with the NPS-NH. The assessment identifies generally low flood hazard risk within the proposed residential and commercial areas, with higher flood hazards concentrated within the proposed wetland and flood management areas. Subject to the proposed mitigation and consent conditions, the natural hazard risks associated with the Proposal are considered appropriately managed.
Policy 1: When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	Section 6.6 and Table 17 of the *Geotechnical Assessment Report* assess the relevant geotechnical hazards using the NPS-NH risk matrix. The residual risks associated with landslips, active faults and liquefaction (including lateral spreading) are all assessed as low. The *Flood Risk Assessment* also considers flood risk using the NPS-NH risk-based framework, including the likelihood and consequences of flooding. The assessment identifies generally low residual flood risk within the proposed development areas following implementation of the proposed flood management measures.
Policy 2: Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The proposed earthworks, removal of unsuitable soils, engineered fill, foundation design and associated construction measures provide a proportionate response to the identified geotechnical risks. Torlesse considers that these measures will appropriately manage the residual risks associated with the development. Flood risks will be managed through reconfigured drainage networks, additional flood storage, defined flood conveyance corridors and appropriate building levels. These measures respond to the different levels of flood hazard across the Site, with higher hazard areas retained primarily for wetland, drainage and flood management purposes. The proposed mitigation is considered proportionate to the identified flood risks.
Policy 3: Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	Torlesse has not identified any very high geotechnical hazard risks associated with the Proposal. The relevant residual geotechnical risks are assessed as low. The *Flood Risk Assessment* applies the NPS-NH risk-based framework and concludes that, with the proposed mitigation in place, the residential and commercial development areas will have a low level of flood risk. Higher flood hazard classifications are concentrated within the proposed wetland and flood management areas rather than the proposed building areas. These hazard classifications are distinct from the risk levels determined under the NPS-NH risk matrix.
Policy 4: Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	Torlesse has considered the potential effects of the proposed earthworks and temporary groundwater lowering on adjoining land and infrastructure, including the Kāpiti Expressway and Kāpiti Road. The risk of settlement affecting neighbouring assets as a consequence of temporary dewatering is expected to be negligible. Torlesse concludes that the identified geotechnical hazards are unlikely to be accelerated or worsened by the proposed works. The *Flood Risk Assessment* identifies approximately 26,000m³ of flood storage during the 1% AEP event, with flood levels and flows generally maintained or reduced on surrounding land. The modelling identifies no material change in off-site flood hazard classifications. The proposed KCDC consent conditions require updated modelling at the Engineering Approval stage to confirm the final design and ensure that significant flood risks are not created or increased on surrounding land.
Policy 5: Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	The *Geotechnical Assessment Report* draws on previous investigations and supplementary investigations undertaken in 2026, including cone penetration testing, trial trenches, test pits and groundwater investigations. The assessment identifies further testing, detailed design and construction monitoring to address residual uncertainties. The *Flood Risk Assessment* uses the latest available KCDC Wharemaukū catchment hydraulic model, supplied in June 2026 and refined using site-specific survey and drainage information. The assessment includes sensitivity testing for increased rainfall, pipe blockage, sedimentation and channel roughness to consider residual flood risks. Further modelling is required through the proposed *KCDC Consent Conditions* to confirm the final design and resolve identified localised uncertainties.

TABLE 10: NATIONAL POLICY STATEMENT FOR NATURAL HAZARDS	
PROVISION	COMMENT
Policy 6: The potential impacts of climate change to at least 100 years into the future must be considered.	The *Flood Risk Assessment* incorporates climate change projections to 2130, including the SSP5-8.5 climate scenario, extending beyond the 100-year assessment period required by the NPS-NH. The modelling considers the effects of climate change on flood levels, flows and hazard classifications, with the proposed flood storage, drainage infrastructure and building levels designed to manage these risks. Torlesse's geotechnical assessment does not provide a separate 100-year climate change assessment. However, the identified geotechnical risks are considered manageable through the recommended engineering and foundation design measures.

11. NATIONAL POLICY STATEMENT FOR INFRASTRUCTURE 2025 (NPS-I)

TABLE 11: NATIONAL POLICY STATEMENT FOR INFRASTRUCTURE	
OBJECTIVE / POLICY	ASSESSMENT OF THE PROPOSAL
Objective 2.1 – Infrastructure benefits, wellbeing, urban development, resilience and efficient delivery	The Proposal includes an integrated network of transport, stormwater, wastewater, water supply and flood management infrastructure necessary to support the development of the Site. This infrastructure will facilitate residential and commercial development within the Metropolitan Centre Zone and provide for the anticipated growth and functioning of the Paraparaumu urban environment. The proposed infrastructure has been developed through an integrated design process, taking into account engineering, hydrological, ecological and urban design considerations. The Proposal is consistent with the overall direction of the objective.
Policy 1 – Providing for the benefits of infrastructure	The proposed infrastructure will support additional housing and business development capacity within an established urban centre. The internal road network, pedestrian and cycling connections, three-waters infrastructure and stormwater and flood management systems will enable the Site to be developed and serviced in a coordinated manner. The flood management infrastructure will also contribute to the management of flood risk within the development. These benefits are relevant when considering the adverse effects associated with the establishment of the infrastructure.
Policy 2 – Operational and functional need for infrastructure in particular locations	The location and configuration of the proposed infrastructure are influenced by the need to service the development, connect to existing networks, provide access from Kāpiti Road and establish suitable drainage and flood management arrangements. The proposed Link Road, internal servicing corridors and stormwater infrastructure must respond to the Site's topography, existing wetlands, Wharemaukū Stream and identified flood hazards. The technical assessments identify constraints associated with alternative infrastructure arrangements. These considerations are relevant to the operational and functional requirements recognised by Policy 2.
Policy 3 – Considering spatial planning	The Site is located within the Metropolitan Centre Zone, Precinct C, and is subject to the MCZ Structure Plan anticipating comprehensive urban development and associated transport connections. The proposed infrastructure has been designed to support this planned urban form, including the establishment of a Link Road and connections to the surrounding transport and servicing networks. The Proposal therefore responds to the relevant spatial planning framework.
Policy 4 – Enabling efficient and timely infrastructure delivery	The Proposal provides for the coordinated delivery of infrastructure alongside residential and commercial development. The proposed road network, servicing infrastructure and stormwater management systems have been designed as integrated components of the development rather than as separate infrastructure projects. Detailed engineering design and implementation will be addressed through the proposed conditions of consent and associated management plans. This approach supports the efficient and timely delivery of infrastructure.

TABLE 11: NATIONAL POLICY STATEMENT FOR INFRASTRUCTURE	
OBJECTIVE / POLICY	ASSESSMENT OF THE PROPOSAL
Policy 5 – Infrastructure supporting activities	Earthworks, temporary drainage arrangements, construction access and associated enabling works are necessary to establish the proposed infrastructure. These activities will be managed through the proposed construction and environmental management measures, including erosion and sediment controls. Policy 5 is relevant to recognising the role of these supporting activities in enabling the infrastructure to be delivered.
Policy 6 – Recognising and providing for Māori interests	Engagement with mana whenua has informed the consideration of cultural values associated with the Site, particularly the Wharemaukū Stream, wetlands and wider cultural landscape. The proposed conditions provide for ongoing involvement in the detailed design, implementation and monitoring of relevant restoration and environmental management measures. This includes opportunities to incorporate mātauranga Māori and cultural monitoring into the management of freshwater environments affected by the infrastructure works.
Policy 7 – Assessing and managing the effects of infrastructure activities	The location and design of the infrastructure have been informed by technical assessments addressing transport, flooding, stormwater, freshwater ecology, hydrology and construction effects. Alternative arrangements have been considered in the context of the Site's physical constraints and the need to establish a functional and integrated urban development. The proposed conditions provide for detailed design, construction management, monitoring and environmental mitigation. These measures are intended to manage adverse effects in a manner proportionate to the nature and scale of the infrastructure works.
Policy 8 – Operation, maintenance and minor upgrades of existing infrastructure	This policy has limited direct relevance, as the Proposal principally involves the establishment of new infrastructure. However, the development will connect to and interact with existing transport and three-waters networks. The design and associated conditions seek to maintain the continued operation and functionality of those networks.
Policy 9 – Managing the effects of new infrastructure and major upgrades	Policy 9 is particularly relevant to the proposed new road network, culverts, stormwater infrastructure and flood management works. The infrastructure is necessary to enable the planned development of the Site and has been designed having regard to the identified physical and environmental constraints. Where infrastructure works affect freshwater environments, including wetlands and streams, the Proposal must also be assessed against the relevant provisions of the NPS-FM, NES-F and other applicable statutory instruments. The NPS-I does not displace those requirements. The proposed ecological compensation, stream restoration, construction management and other mitigation measures are relevant to the management of the infrastructure-related effects.
Policy 10 – Planning for infrastructure compatibility	This policy is principally directed towards decisions on planning instruments and therefore has limited direct application to the substantive consent application. Nevertheless, the Proposal adopts an integrated approach to the relationship between infrastructure and land use, including the location of transport corridors, servicing infrastructure and stormwater management areas within the development.
Policy 11 – Managing the interface between infrastructure and other activities	Policy 11 is also directed towards planning instruments. The underlying considerations are nevertheless relevant to the design of the development, particularly the interface between roads, infrastructure corridors, residential activities, commercial activities and public open space. These matters have been considered through the transport, urban design and engineering assessments.