

Comments on a Substantive Application under section 53 of the Fast-track Approvals Act 2024: Wetland Ecology

Fast-track project name	Waikanae North Development
Fast-track application number	FTAA-2603-1194
GW file number	FTA106

Technical area	Wetland Ecology
Date	21 July 2026
Author	Melanie Dixon Principal Ecologist Collaborations
Statement of expertise	I am an ecologist with over 25 years of experience, first for local government then as a consultant. I have a particular focus on wetland ecology. I am employed as the Principal Ecologist for Collaborations, a small consultancy that works across a range of environmental, land and water science fields. I have a BSc. in ecology and botany and a diploma in environmental science, both from Auckland University. I have experience providing evidence for Hearings and Environment Court.
Code of conduct	I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This technical memorandum has been prepared in accordance with that Code. Unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.
Documents considered	• Building Block Planning Ltd. 2026. Substantive Application: Fast-track Approvals Act – Waikanae North Developments Limited Application for Resource Consent and Wildlife Approval (169–171 Peka Peka Road, Waikanae). Prepared for Waikanae North Developments Limited, 30 March 2026 “the application” • Appendix 23: RMA Ecology Ltd. 30 March 2026. Waikanae North Development: Fast Track Application: Assessment of

	ecological effects. Report prepared for Waikanae North Developments Ltd. 159 pages + appendices. “the Ecological Assessment” • Appendix 26: RMA Ecology Ltd. 30 March 2026. Waikanae North Development Fast Track Application: Ecological Restoration Management Plan. Report prepared for Waikanae North Developments Ltd. 91 pp. + Appendices. “the ERMP” • Appendix 33: Proposed draft conditions of consent. “proposed conditions” • Appendix 17: O’Callaghan Design Ltd. March 2026. Waikanae North Development Fast Track Application: Hydrological Report. Report prepared for Waikanae North Developments Ltd. 42 pages including appendices “hydrology report” • Post lodgement: Local Landscape Architecture Limited. 15 July 2026. Waikanae North Wetlands and Stream Plan (A3). 2109-1238. “wetland and stream map” • J Blyth (21/07/2026). Waikanae North Development – Hydrology Comments on Section 53 Substantive Application. FTAA-2603-1194 • G Taylor (21/07/2026). Waikanae North Development, – Stream Ecology Comments on Section 53 Substantive Application. FTAA-2603-1194
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Comments

Summary

With respect to wetland ecology, the Ecological Assessment provides the level of detail required to evaluate ecological values across the site, assess the magnitude of potential effects, and determine the overall level of effect associated with the proposed development. It adopts a transparent assessment framework consistent with the effects management hierarchy outlined in the NPS-FM and NPS-IB and best-practice guidance¹.

Most potential areas of disagreement have been resolved through early and ongoing engagement with the applicant’s experts, with the feedback provided on earlier drafts of the technical assessments having been considered and incorporated into the lodged documentation.

¹ The Ecological Impact Assessment Guidelines (EclAG published by EIANZ). Full reference: Roper-Lindsay, J., Fuller S.A., Hooson, S., Sanders, M.D., Ussher, G.T. 2018. *Ecological impact assessment. EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems*. 2nd edition.

One matter that has not been resolved is the need to provide ‘like for like’ offsetting for wetland loss as set out in this memo.

There are also unresolved wetland hydrology issues that may affect the success of the proposed wetland restoration and offsetting. These are discussed in James Blyth’s memorandum. This is particularly important because wetland hydrology drives wetland ecology; without a clear understanding of hydrological processes, it is not possible to confidently protect, restore, or offset wetland values. I support Mr Blyth’s recommendation (at paragraphs 34 and 35 of his memo) for conditions requiring an eco-hydrological monitoring and response plan.

Agreement with the applicant

1. Apart from the requirement to provide ‘like for like’ offsetting for the classification of wetland types, I agree that the proposal is sufficient to achieve a net gain outcome to offset the 1.69 ha of wetland while also delivering additional wetland enhancement across the site.

Matters in contention and suggested response

Classification of wetland types

2. Four individual wetlands (W3, W5, W9 and W10) and parts of wetlands associated with the Ngarara Stream (W6, W2.1, W16, W17, and W18) totalling 16,852 m² are proposed to be removed as part of the development².
3. There are four main functional freshwater wetland types recognised in the New Zealand Wetland Classification system, swamp, bog, marsh and fen, and three minor types, shallow water seepage and ephemeral wetland. The distinguishing features for these wetland types are (1) hydrology e.g. water source (rainfall, groundwater, surface water), water flow, water table in relation to ground level, water fluctuations, and periodicity (whether the wetland dries out occasionally or seasonally) (2) substrate (mineral and/or peat), (3) nutrient status and (4) pH. In an unmodified condition, each wetland type supports a different plant community³.
4. In the Ecological Assessment these wetlands have assigned the wetland types as described in Table 1 next page.

² For reference, Table 9 in the Ecological Assessment lists the area in m² of each wetland and associated cluster. This is illustrated in Figure 22. Table 22 has figures for wetland loss summarised by cluster. Figure 31 shows the areas of wetland loss. Descriptions of the wetland areas to be lost are presented in Appendix F.

³ Using the classification system of Johnson, P. N., & Gerbeaux, P. (2004). *Wetland types in New Zealand*. Department of Conservation, Wellington.

Table 1: Wetlands proposed to be lost as part of the development, the cluster they are in, the size of loss and the wetland type assigned in the ecological assessment

Wetland	Wetland Cluster	Partial or full loss	Wetland type in the Ecological Assessment	Wetland type (this review)	Comment
W3	WC4 - Dune edge	Full	Ephemeral (degraded)	Fen	Dune impounded fen feed by groundwater and rainwater with some peat present.
W5	WC 5 – Eastern Wetland Cluster	Full	Marsh and Ephemeral	Fen	As above.
W9	WC 5 – Eastern Wetland Cluster	Full	Marsh and Ephemeral	Fen	Potentially fen, located on the edge of the Ngarara Stream Swamp, but very degraded, so marsh maybe accurate.
W10	WC 5 – Eastern Wetland Cluster	Full	Marsh and Ephemeral	Fen	As above.
W6	WC2 – Ngarara Stream	Partial	Swamp	Swamp	
W2.1	WC2 – Ngarara Stream	Partial	Swamp	Swamp	
W16	WC3 – Lower Ngarara Stream	Partial	Swamp	Swamp	

Wetland	Wetland Cluster	Partial or full loss	Wetland type in the Ecological Assessment	Wetland type (this review)	Comment
W17	WC3 – Lower Ngarara Stream	Partial	Swamp	Swamp	
W18	WC3 – Lower Ngarara Stream	Partial	Swamp	Swamp	

5. The hydrological characteristics of the wetlands proposed to be lost as part of the development, have not be considered by in the hydrological report and therefore this is not described in detail. Nor was the presence or depth of peat surveyed in these wetlands. Had this information been provided it would have been useful in correctly assigning wetland type.
6. That said, based on the descriptions in the report and my site observations, Wetland 3 and Wetland 5 are dune-impounded fens in which groundwater and rainfall are the most important water sources. The landform of Wetland W9 and W10 has been modified, making the correct wetland type more difficult to confirm, but these too could be degraded areas of fen on the margin of what was once a much larger swamp associated with the floodplain of the Ngarara Stream.

Approach to offset Wetland 3 & Wetland 5

7. Wetlands 3 and 5 are sand dune-impounded wetlands that account for a substantial proportion of the proposed wetland loss. Wetland 3 covers 1,569.1 m² and represents approximately 9.3% of the total wetland loss (16,852 m²), while Wetland 5 covers 3,314.5 m² and represents approximately 19.7% of the total wetland loss. Together, these two wetlands comprise approximately 29% of the total wetland area proposed to be lost. While the current vegetation composition of both wetlands are similar to other wetlands proposed to be removed they are not of the same wetland type as those proposed for restoration.
8. Wetland 3 and Wetland 5 differ from the other wetlands that are proposed to be permanently lost as part of the development in terms of their landscape position and hydrology. They are dune-impounded fens whereas the proposed offset wetlands are swamps located on the

floodplain of the Ngarara Stream. As mentioned previously in their unmodified condition, fens and swamps support different plant communities.

9. As a result, the proposed offsetting does not provide a “like for like” replacement for the loss of Wetland 3 and Wetland 5. This matter has been discussed with the applicant and the applicant’s ecologist in relation to Wetland 3 most recently at a meeting on 4 June 2026⁴. I understand that the applicant is exploring additional compensation options, including possible wetland restoration at Queen Elizabeth Park (where similar wetlands are found). However, at the time of writing no additional information on this matter has been provided.
10. This issue is significant because the proposed offsetting would replace a dune-associated fen with floodplain swamp, a wetland type that is easier to restore or recreate. Given that many developments on the Kāpiti Coast are likely to encounter similar constraints, there is a cumulative risk of progressively reducing the diversity of wetland types within the wider landscape.
11. In my view, further compensation for the loss of Wetland 3 and Wetland 5 is required, given it is not possible to provide like for like replacement on site. For example, the restoration (e.g. of water levels, weed and pest control, replanting) of a coastal fen on private or public land in the Foxton Ecological District.

⁴ That Wetland 5 is clearly a different wetland type was only identified late in this review.