

Project Number	FTAA-2603-1194
To	169–171 Peka Peka Road, Waikanae North Developments Limited Panel Convener
Subject	Waikanae North Developments Limited – Response to Minute 2 and Key Issues Memorandum
Date	21 May 2026
Prepared by	Waikanae North Developments Limited and Building Block Planning Limited

1.0 Executive Summary

- 1.1** Waikanae North Developments Limited (WNDL) proposes a staged residential subdivision of approximately 1,200 lots on a 139.35 ha site at 169–171 Peka Peka Road, Waikanae. The project is a listed project under Schedule 2 of the Fast-track Approvals Act 2024 (FTAA).
- 1.2** The application is a well-supported and comprehensive package. The primary focus for the Panel will relate to ecological and freshwater matters. There are live issues, but these are manageable by conditions. An extensive suite of experts have provided and will continue to provide input into the proposal, including by peer review.
- 1.3** Transport, infrastructure, urban design, landscape, cultural, and planning matters are well-documented and present manageable issues within the ordinary scope of a project of this type and scale.
- 1.4** A comprehensive draft conditions package accompanies the application. The draft conditions set will require refinement in consultation with the Councils and other interested parties, including iwi.

2.0 Purpose of Memorandum

- 2.1** This memorandum has been prepared in response to Minute 2 of the Panel Convener dated 14 May 2026. The memorandum provides the applicant's response to the matters set out in that Minute and Schedule 1, including the extent of pre-lodgement engagement, the level of complexity of the application, the principal environmental effects and key issues, proposed efficient processes for resolution, and the applicant's views on panel membership and composition.

3.0 Project Overview

Site

- 3.1** The site comprises approximately 139.35 ha of generally flat to gently undulating dune country at 169–171 Peka Peka Road, Waikanae, Kāpiti Coast District. It is bounded by Peka Peka Road to the north-east, the Te Moana Road catchment to the south, the Kāpiti Expressway to the east, and rural lifestyle development to the west. The site is currently primarily in pastoral use and contains small areas of remnant indigenous vegetation, the Ngārara Stream, a network of farm drains, wetlands, and dune ridges.

- 3.2** District Plan zoning and notations include the General Rural Zone (majority of site), Rural Lifestyle Zone (smaller portion), Rural Dunes Precinct (approximately 84% of site), and Special Amenity Landscape SAL 19 Ngārara Dunes (approximately 54.92 ha, or 39.4% of the site). Ecological Sites K060 (Peka Peka Road Swamp) and K066 (Te Harakeke Swamp) are adjacent to and partly within the site.

Proposal

- 3.3** The application proposes:
- a. a staged residential subdivision of approximately 1,200 lots over approximately 15 years, including neighbourhood and active mode connections
 - b. a local centre providing neighbourhood-scale retail, commercial and community services
 - c. three-waters infrastructure, stormwater management devices, and a twin-box culvert flood-mitigation structure
 - d. Ngārara Stream realignment (993 m) and culverting (76.9 m), with loss of stream extent and values offset to achieve an overall net gain
 - e. wetland works: 1.69 ha of wetland loss with an offset of at least 1.75 ha of purpose-built offset wetland, achieving a net-gain outcome, as well as additional enhancement of existing low-quality wetlands
 - f. indigenous vegetation clearance with net-gain replacement planting
 - g. a Wildlife Act 1953 approval for the capture and relocation of lizards (primarily northern grass skinks)
 - h. a comprehensive suite of conditions to manage adverse effects and deliver assessed outcomes

Statutory Framework

- 3.4** The application is lodged under the FTAA as a listed project under Schedule 2. The FTAA process bundles consenting decisions otherwise required under multiple statutes into a single Panel-determined outcome.
- 3.5** The economic assessment quantifies the project's benefits as substantial: approximately \$261 million in construction-phase GDP contribution, approximately 1,600 FTE jobs during construction, ongoing GDP contribution of approximately \$35.9 million per annum, and an extension of Kāpiti's greenfield residential capacity from approximately 6 to approximately 11.1 years.
- 3.6** The Panel's decline threshold under section 85 requires a proportionality assessment between adverse impacts and the project's regional or national benefits — taking into account any conditions available to address those impacts. Section 85(4) provides that a Panel may not decline solely on the basis of inconsistency with a provision of a specified Act.

4.0 Engagement

- 4.1** The applicant has engaged extensively as part of the development of the application, including with Greater Wellington Regional Council (GWRC), Kāpiti Coast District Council (KCDC), iwi, and infrastructure providers. This engagement is explained in detail in the application document and the Consultation Summary Report provided as Appendix 37 to the application.
- 4.2** As part of that engagement process, early drafts of the majority of the supporting technical assessments were provided, as relevant, to both KCDC and GWRC for review. Feedback provided by both Councils was considered and, where appropriate and/or necessary, was incorporated into final reporting, plans, or the application document.

- 4.3** We have appended a table below which sets out the areas of the application design or documentation that have been peer reviewed, the peer reviewers and who commissioned the peer review.
- 4.4** We have received additional feedback following lodgement. Drawing on that feedback, we have identified key issues that WNDL understands are outstanding.
- 4.4** Since lodgement, the applicant has continued engagement with GWRC, KCDC, the Department of Conservation, and Te Ātiawa ki Whakarongotai Charitable Trust. The applicant remains committed to constructive engagement throughout the FTAA process.

5.0 Complexity

- 5.1** While the WNDL application seeks approvals for a relatively large land development project, it is supported by a comprehensive evidence base and has been the subject of extensive consultation and peer review feedback. Taking these matters into account the level of complexity is assessed as low-moderate.
- 5.2** In terms of legal complexity:
- a. The FTAA is relatively recent legislation. This application raises questions about the application of the FTAA decision-making framework to activities that would otherwise be prohibited or restricted under NES-FM and NPS-FM. The applicant has obtained independent legal advice on these matters. They should be relatively straightforward.
 - b. The application bundles approvals under multiple statutes — the FTAA, RMA, and Wildlife Act 1953.
 - c. The classification of the farm drain network raises questions about the interface between the RMA definition of “river,” NES-FM, Regional Plan, and the FTAA’s approach to what would otherwise be restricted activities.
 - d. Questions of statutory interpretation may also arise in connection with the economic assessment methodology and the weight to be given to regional and national benefits under the section 85 proportionality assessment.
- 5.3** In terms of evidentiary and factual complexity:
- a. The application is supported by a comprehensive suite of specialist reports, with peer reviewers engaged by both KCDC and GWRC across the key technical areas.
 - b. The principal technical matters in contention — drain/stream classification, SEV methodology, and the hydrological basis for the wetland offset — are well-defined and capable of resolution through expert conferencing.
 - c. The volume of material is substantial but is well-organised and the key issues are clearly identified. There are no matters of scientific or technical novelty.

6.0 Key Issues

Ecology

Wetland effects

- 6.1** The site contains 18 mapped wetland areas totalling approximately 25.18 ha. The proposal involves the loss of 1.69 ha of moderate quality wetland extent, offset by at least 1.75 ha of purpose-built offset wetlands achieving a net-gain outcome, as well as additional enhancement of existing low-quality wetlands.

- 6.2** The Ecological Restoration and Management Plan (ERMP) provides for at least 15 years of monitoring with ecological milestones, trigger thresholds, and adaptive management provisions. Conditions seek to secure the ERMP obligations beyond any change in landholding.
- 6.3** The principal wetland questions are whether the effects assessment, offset design and proposed conditions are accurate and sufficiently robust to reliably deliver the claimed no net loss/net-gain outcome.
- 6.4** The hydrological underpinning of the offset wetlands is addressed further at paragraphs 6.17–6.19.
- 6.5** A secondary matter, raised by GWRC’s peer reviewer (Collaborations), is the long-term management of water levels in Te Harakeke Swamp, which is adjacent to and hydraulically connected with the development. Te Harakeke Swamp experiences significant water-level fluctuations, and there is currently no active management plan or resource consent in place for ongoing drain-clearance works by KCDC. While the preparation of such a plan is not the applicant’s responsibility, the appropriate siting of infrastructure relative to the wetland boundary — and the elevation of any housing, boardwalks and fencing — should be assessed to ensure sufficient flexibility is available to enable (or not cause interference with) appropriate management of water levels in Te Harakeke Swamp.

Stream and freshwater

- 6.6** The applicant considers, based on legal advice obtained and appended to the application, that Ngārara Stream is the sole stream affected by the development. It is a linear channelised stream. The application proposes to re-align part of the stream so that it runs underneath the transmission lines traversing the property. The proposed realignment (993 m) and culverting (76.9 m) is supported by an equivalent-or-better habitat design philosophy, incorporating meandering alignment, riffle-pool morphology, riparian planting, and fish-passable culvert structures.
- 6.7** Eleven native fish species are recorded on or near the site, five of which are At-Risk – Declining. The ERMP and Native Freshwater Fauna Salvage and Relocation Plan provide for species management.
- 6.8** Through the completeness check process, GWRC has identified two specific issues that are the subject of ongoing engagement between the parties and may be a focus of the FTAA assessment. These matters are identified and discussed as follows.

Drain classification

- 6.9** The site has a network of farm drains of varying sizes linked to the Ngārara Stream. GWRC’s position is that where these drains were constructed to drain pre-existing wetland areas they should be classified as rivers or streams, and the loss of their extent and value must be assessed and addressed. The applicant has obtained legal and ecological advice on the classification question and considers the drains are outside the RMA definition of “river.” They are artificial watercourses constructed to drain what was formerly wetland. They are located on flat land and do not extend “upstream” beyond the site. In any event, the applicant’s ecology team has assessed that the drains have low ecological value and their removal is not of concern from an ecological effects perspective.
- 6.10** Under the FTAA, even if the drains are classified as rivers or streams and modification of them would otherwise be a restricted activity under NES-FM, that is not in itself a ground to decline the application. The key question arising for the Panel is the significance of the effect of loss of drain extent and values. The key considerations are: what values — hydrological connectivity, habitat, invertebrate and fish passage — are currently supported by the drain network; and what is the net outcome when the proposed mitigation and compensation measures (fish relocation, wetland offset, stream realignment, riparian planting, and new stormwater alignments) are taken into account. Effects arising from the removal or modification of these drains will not be

significant and can be compensated for, in the unlikely event the Panel considers this is necessary in the context of this application.

Stream Ecological Valuations (SEVs)

- 6.11** The applicant has provided SEV calculations for the Ngārara Stream and two larger drains. GWRC's peer reviewer (Collaborations) has noted some limitations, including the absence of sampling location and date metadata, incomplete contextual information, the absence of macroinvertebrate sampling, and fish records collected at a different time and potentially a different location to the SEV reaches. These limitations are said to affect confidence in the compensation quantum.
- 6.12** The applicant's highly experienced and well-regarded ecology team is confident that the assessment undertaken is robust and the offset and compensation package is more than adequate, with additional on-site capacity available to make up any shortfall that may be required (the need for which is not accepted). In particular, macroinvertebrate sampling would not alter the conclusion that these watercourses are of low quality; and when the SEV is applied as an offsetting tool, biodiversity data drops out of the calculation, meaning the existing data is sufficient for offset accounting purposes.
- 6.13** The ecology team can address these matters through supplementary information, expert conferencing, or a short hearing process. Given the limited ecological values in question and the net-gain outcomes proposed, this matter is highly unlikely to be a of significant concern, let alone a reason to decline under section 85.

Indigenous vegetation and terrestrial fauna

- 6.14** Indigenous vegetation clearance is proposed with net-gain replacement planting outcomes.
- 6.15** A Wildlife Act 1953 approval is sought for the salvage and relocation of lizards (primarily northern grass skinks, as species that is classified as Not Threatened by the Department of Conservation). These matters are well-addressed in the application and are not anticipated to be significant points of contention.

Other ecological issues

- 6.16** There are a range of other ecological issues that can be managed through conditions, including pest and pet management, maintenance of ecological restoration and enhancement measures, and adaptive responses if required.

Hydrology

- 6.17** Hydrology is a cross-cutting topic on this site given the hydraulic interconnection between the dune-sand aquifer, the spring-fed wetland mosaic, the Ngārara Stream, and the farm-drain network. The success of the proposed wetland offset and stream realignment depends materially on hydrological outcomes.
- 6.18** GWRC's peer reviewer (Collaborations) has identified some limitations with the Hydrological Report:
- a. use of a simple annual water balance model rather than a hydrogeological groundwater model to evaluate pre- and post-development groundwater conditions
 - b. no flow time-series or water-level analysis for the Ngārara Stream to assess hydraulic connectivity with adjacent wetlands
 - c. reliance on a single assumed hydraulic conductivity value for peat, with no sensitivity testing, in the context of removing approximately 475,000 m³ of peat and replacing it with compacted sand
 - d. no assessment of potential sediment deposition in the channel bed over time, noting the high fine-sediment loading already identified in the Ngārara Stream

- 6.19** The applicant's civil engineer, who has qualifications and experience in hydrological matters, is confident that the hydrological assessment is adequate given the site's characteristics, the development design and construction methodology, the quality of the existing environment and the robust suite of proposed conditions. The peer reviewer has acknowledged that some of these matters may be addressed through robust consent conditions incorporating adaptive management, monitoring, trigger thresholds, and clearly defined response actions. This is likely to be the focus of pre-hearing discussions and expert conferencing. The applicant acknowledges that the conditions framework needs to include appropriate monitoring and adaptive management provisions.

Transport

- 6.20** The Integrated Transport Assessment (ITA) models a conservative envelope of 1,250 dwellings, generating approximately 9,684–9,914 vehicle movements per day. Key intersections are projected to perform at acceptable levels of service. The Te Moana Road/Kāpiti Expressway interchange is the most constrained movement but remains within the range commonly regarded as acceptable for a managed arterial interchange.
- 6.21** The Tonkin+Taylor peer review commissioned by KCDC and consultation with NZTA did not raise any fundamental traffic-effects objections.
- 6.22** The main transport issues are:
- a. the adequacy and timing of active-mode connections to Peka Peka Road and the existing shared-path network on the Expressway
 - b. delivery mechanism clarity — which transport infrastructure elements are developer-funded, which are Council-funded, and what staging triggers apply
- 6.23** Metlink has confirmed that the Tūhono commuter rail service extension is anticipated by 2030, which strengthens the multi-modal case. The proposal makes provision for bus-stop infrastructure, enabling bus-service extension. These are ordinary staging and conditions matters well within the Panel's discretion.

Urban Design

- 6.24** The application presents a coherent masterplan with a structure of neighbourhood blocks, a local centre, reserves and green corridors, and principal movement spines. Form-based controls govern the local centre and medium-density product. A proposed Design Review Panel mechanism is intended to certify detailed design across the 15-year staging horizon.
- 6.25** The peer review by Boffa Miskell, commissioned by KCDC, did not raise any significant issues that have not been addressed by the application.
- 6.26** The primary urban-design matters for the Panel are confirming the scope, composition, and decision-making framework of the Design Review Panel in conditions, and confirming phasing requirements for the local centre relative to population delivery.

Landscape

- 6.27** The Landscape and Visual Assessment (undertaken using Te Tangi a te Manu, NZILA 2022 methodology) assessed 13 representative viewpoints and 19 adjoining private properties. Overall landscape and visual effects were assessed as Low to Moderate across the majority of the site, transitioning to Low (and in some instances positive) as mitigation planting matures. Part of the site (39.4%) falls within SAL 19 Ngārara Dunes, and the Rural Dunes Precinct covers approximately 84% of the site.
- 6.28** The proposed mitigation framework includes height limits in visually sensitive areas, a 30% LRV cap on external cladding and roofing, 50% boundary-buffer planting, and

restrictions on earthworks and retaining wall height. The primary residual issue is the durability and enforceability of the landscape planting controls across the 15-year delivery horizon, particularly during the period before planting matures.

- 6.29** The peer review by Boffa Miskell, commissioned by KCDC, did not raise any significant issues that have not been addressed by the application.

Cultural

- 6.30** Engagement with iwi has been taking place over a number of years. The Te Ātiawa ki Whakarongotai Charitable Trust has provided a Cultural Values Assessment and a Cultural Impact Assessment.
- 6.31** The development has responded to and respected the aspects of cultural significance raised in this pre-application material.
- 6.32** The site was sold by Wi Parata in an arms-length commercial transaction to the family from whom WNDL acquired the site. There are no known sites of significance, historical battlefields, wāhi tapu, or sites of occupation on the property, with the only known archaeological sites being middens and fire pits as described in the archaeological assessment appended to the application.
- 6.33** The site has cultural significance to Te Ātiawa as kaitiaki and holder of mana whenua. The applicant understands that other iwi with an interest in the site have deferred to Te Ātiawa, with a possible exception of Muaūpoko, which has not responded to pre-lodgement requests for feedback.
- 6.34** The application proposes a Kaitiakitanga Management Strategy (KMS) co-developed with the Trust, cultural monitoring during earthworks and stream works, a Tīmatanga ceremony as a precondition to staged earthworks commencement, and Trust input into naming, signage, ecological restoration, and interpretation within the development.
- 6.35** Discussions are ongoing with Te Ātiawa in respect of proposed conditions, matters contained in a draft side agreement which has been exchanged, and in respect of long-term arrangements for the ownership of the open space areas within the site.
- 6.36** Te Ātiawa has also raised concerns about residual cultural effects, including the general impact of further residential development in the district on cultural values and associations and historical loss of ancestral land in its rohe. Discussions are ongoing about whether and how this aspect can and should be addressed in the context of this application.
- 6.37** An Archaeological Authority from Heritage New Zealand Pouhere Taonga will be sought separately.

Economic

- 6.38** The proposal will result in significant economic benefits. The proposal will make a \$261M contribution to construction sector GDP and support 1,600 FTE jobs during construction. A further 326 FTE ongoing jobs are supported by the development with a \$35.9M ongoing GDP contribution.
- 6.39** KCDC commissioned a peer review of the applicant's analysis by Derek Foy of Formative. The Formative review appeared to take a business-as-usual approach under the RMA rather than assessing the project under the FTAA statutory framework. It essentially questioned the need for the project given provision for intensification under the MDRS and upzoning undertaken to give effect to the NPS-UD.
- 6.40** The applicant's economic assessment, supported by a legal opinion from Bal Matheson KC, responds to the matters raised in the Formative assessment and provides a robust basis for the Panel's benefits assessment under section 85 of the FTAA.

- 6.41** Kāpiti Coast District Council has subsequently re-affirmed its high-level support for the project, including the benefits it will bring to the district, in a letter appended to the application.

Planning

- 6.42** The main planning matters for the Panel are:
- a. The appropriateness of the applicant's approach of assessing the proposal against the General Residential Zone and applying building controls from that zone, given its characteristics and the fact that this is a listed project.
 - b. If the applicant's approach is not agreed, the significance (under the FTAA) of the fact that the site is rurally zoned and the proposal is not envisaged by the existing zoning.
 - c. NES-FM Regulation 53 (wetland drainage as a prohibited activity): the application addresses this by adopting an approach equivalent to that applicable under NES-FM and NPS-FM if the site were zoned urban. In any event, under the FTAA, prohibited activity status is not a bar to consent; the question is the significance of the effect relative to the project's benefits. Here the effect will be fully offset both in extent and values. The legal framework for the Panel's approach under section 85, and the nature and extent of effects in question, are addressed in the planning and ecological assessments.
 - d. Drain/stream classification: as noted at paragraph 6.9, this is a live matter between the applicant and GWRC. The applicant has legal advice supporting its position, and the FTAA process is the appropriate forum for resolution. A short hearing (or at least expert conferencing) may be required.
 - e. Consent durations: 15 years for land-use consents and 35 years for discharge permits are sought, reflecting the staged development programme and the maturation periods for ecological and landscape mitigation.
 - f. Conditions: a comprehensive draft conditions package is provided with the application. ESC conditions were noted by GWRC's peer reviewer (Southern Skies Environmental) as requiring further refinement — in particular, ensuring that adaptive management provisions are reflected in the draft ESCP as well as in the CEMP. This is an ordinary matter for the conditions process.

Other Specialist Matters

- 6.43** Engineering and infrastructure, flood hazard, acoustic, geotechnical, and soils matters are addressed in the specialist reports accompanying the application. No significant completeness or substantive content issues were raised in respect of these topics through the peer review and completeness check processes.

7.0 Efficient Processes and Conditions

- 7.1** The applicant proposes expert conferencing as the principal mechanism for narrowing and resolving the key technical issues in contention. Expert conferencing is well-suited to the principal matters — drain/stream classification, SEV methodology, hydrology, and wetland offset — and offers a proportionate and efficient pathway toward resolution. If there are any residual issues following this process, a short hearing may be warranted. In any event, targeted expert conferencing on discrete topics prior to any hearing (if one is considered necessary or desirable) would significantly reduce the scope of disputed matters.
- 7.2** The draft conditions package accompanying the application was not reviewed by either KCDC or GWRC prior to lodgement. The applicant has since reached out to both

Councils and is actively seeking their input on the draft conditions in advance of formal FTAA processes commencing in earnest. The applicant is committed to a collaborative and constructive approach to conditions development.

- 7.3** The applicant supports Panel-facilitated conferencing as the primary means of progressing the conditions package. A number of conditions matters remain to be worked through, and direct Panel involvement in conditions conferencing is likely to be both productive and efficient.

8.0 Panel Membership

- 8.1** The applicant considers a three-member panel is appropriate for this application, having regard to its scale, nature, and level of complexity as discussed above.
- 8.2** The applicant's view on the skills, knowledge and expertise required is:
- a. Legal: to address the legal questions arising under the FTAA, including the application of section 85, the interface with NES-FM and NPS-FM, conditions drafting and to lead any hearings process (if required).
 - b. Planning: resource management planning expertise, ideally with a strong background in conditions drafting and management. Given the volume and complexity of conditions anticipated, a panel member with specialist conditions drafting experience is likely to be valuable.
 - c. Civil and project engineering: familiarity with stormwater management, hydrological matters, and infrastructure delivery for large-scale subdivision. This will assist the Panel in engaging with the technical hydrology and engineering evidence.
- 8.3** The applicant does not consider a dedicated ecological panel member to be necessary, having regard to the number and calibre of expert ecologists engaged across the parties — including RMA Ecology for the applicant and Collaborations and Boffa Miskell as peer reviewers. The Panel will have access to experienced ecological expert feedback, and the key ecological matters can be addressed effectively through that evidence and expert conferencing.

9.0 Summary

- 9.1** Ecology, hydrology, planning matters, and conditions are likely to be the primary focus for Panel examination. The specific matters most likely to require detailed attention are:
- a. the classification of the farm drain network (rivers and streams versus artificial watercourses) and the implications of any determination for the no-net-loss assessment
 - b. the methodology and completeness of the Stream Ecological Valuations
 - c. the long-term management of water levels in Te Harakeke Swamp and appropriate infrastructure siting in relation to it
 - d. the hydrological conditions underpinning the proposed wetland offset and enhancements, and the adequacy of adaptive management conditions to manage any residual uncertainty
- 9.2** Legal questions arise in respect of some of those matters as well as in respect of an appropriate approach to an economic assessment under the FTAA. The applicant has obtained independent legal advice on these matters.
- 9.3** GWRC has confirmed it anticipates and is willing to participate in targeted discussions on these topics, and the applicant is engaged and supportive of that process.

- 9.4** KCDC has been highly engaged in pre-application workshops and consultation. Transport, urban design, landscape, cultural, and planning matters present issues well within the ordinary scope of a project of this type and scale. All are capable of resolution through the hearing process and conditions of consent.

Appendix – Expert Witness and Peer Reviewer Schedule

Topic Area	WNDL Experts	KCDC / GWRC Peer Reviewer
Urban Design and Masterplanning	McIndoe Urban Local Landscape Collective Limited	Boffa Miskell for KCDC
Landscape	Local Landscape Collective Limited	Boffa Miskell for KCDC
Engineering and Infrastructure	Landlink Limited	Infill Limited and internal review for KCDC
Transport	Stantec	Tonkin + Taylor and internal review for KCDC
Stormwater Management and Hydrology	Landlink Limited (Stormwater) O'Callaghan Design Limited (Hydrology)	Collaborations (Hydrology) for GWRC The Urban Engineers (Stormwater) for GWRC SLR (Hydrology) and Infill Limited (Stormwater) for KCDC
Ecology	RMA Ecology	Collaborations for GWRC Boffa Miskell for KCDC
Flood modelling	Awa Environmental	No peer review undertaken (note Awa undertakes flood modelling for KCDC)
Erosion and Sediment Control	Landlink Limited	Southern Skies Environmental for GWRC Infill Limited for KCDC
Geotechnical	CGW Consulting Engineers	Infill Limited for KCDC (not a specialised geotechnical peer review)
Archaeology	Emily Howitt Archaeology	No peer review considered necessary by KCDC
Economics	Urban Economics	Formative for KCDC
Acoustics	Styles Group	No peer review considered necessary by KCDC

Soils and Land Productivity	AgFirst	Katie Beecroft, Lowe Environmental Impact for KCDC
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