Waikanae North Developments Project (WNDP) – Invitation to Comment under Fast -Track Approvals Act 2024 (FTAA24)

1. Contact Details			
Organisation	None		
First name	Kevin and Karen		
Last name	Baker		
Postal address	[redacted]		
Home phone / Mobile phone	[redacted]	**Work phone**	
Email	[redacted]		

2. We will email you draft conditions of consent for your comment			
☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

Comments

Introduction and Summary

Thank you for the opportunity to comment on the Waikanae North Development (WND) Project application (the Project) for various consents/approvals under the FTAA2024. We are the owners/occupiers of [redacted]

We have been following aspects of the WND Project over the last 6 – 12 months as information has been circulated to owner/occupiers adjacent to the site by advisers of WND. We have not responded prior to this as we understood that we would have an opportunity to comment under consents/approvals required of WND, and because the circulated information was condensed and summarised, and not necessarily complete. We provide our comments below on the Substantive Application (SA).

We support the development of new housing, and a mix of housing which enables low to middle income earners to meet their housing needs in the region. However, we do not support the proposed Project by WND in its current form, as the extent of its adverse effects are out of proportion to its benefits. We set out below our analysis of the Project and the reasons which support our conclusion that the Project as presented should be declined or significant new conditions imposed for any approval.

In summary the Project:

- is inconsistent, disproportionate and significantly adverse to the existing local eco-system and seeks to destroy/erode the character of the site including the existing Rural Dunes Precinct (Special Designation Area) which covers virtually all of the site;

- the urban configuration lacks the adoption of new homes development sustainability and technology choices in critical areas of fresh water, waste-water and climate change resilience, and as a consequence the proposed land use has significant adverse effects in these areas;
- adopts highly contestable assumptions and presents information and conclusions which lack robustness, are unproven and non-persuasive to justify the benefits presented including traffic mitigations, regional economic benefits and contributions to housing supply and affordable housing; and
- does not demonstrate a design philosophy which could create a more imaginative and sustainable rural residential solution for this unique Kapiti location.

Examination and analysis of the SA demonstrates that the cumulative impact of the adverse effects are significant and mitigations weak or minor, while the regional and national benefits are low or moderate, and therefore the extent of the adverse effects are out of proportion to the benefits. As set out in the FTAA, the SA should be declined by the Panel, or significant additional conditions applied before acceptance is justified.

Inconsistent and Adverse Effects with local Eco-system

Lot sizes are Disproportionate to the Rural Location

WND propose to develop the site with around 1200 individual properties, with average plot sizes of around 490 square metres (sm), and as low as less than 300sm. This represents a significant change in land use and densification levels more representative of highly urbanised city locations. This densification level is inconsistent and disproportionate relative to the surrounding largely rural / lifestyle properties in the Waikanae North, PekaPeka and TeHoro areas.

If the WNDP is consented/approved, lot sizes should be in the order of 1,000sm minimums rather than the average of 490sm planned by WND.

Earthworks and Special Amenity Designation

Earthworks as referred to in the WNDP earthworks plan and, as illustrated by figure 39 of the SA, are extensive covering roughly 90% of the site not classified as wetlands, whilst all but the ridgeline/tops of sand dunes are subject to earthworks and build-out. Meanwhile figure 11 of the SA shows that the site is predominantly designated as Rural Dunes Precinct and a Special Amenity Landscape (SAL). The Kapiti Coast District Council (KCDC) district plan states that 'land use and development are anticipated to be carried out in a manner that retains the sensitive landscape and ecological character of the area … and that the overall density of the development should be very low so as to retain the areas sense of openness'. Figure 11 of the SA overlaid with figures 34 and 39 illustrate clearly the significant and adverse change in the character of this sensitive landscape.

The sand dunes on the western side of the site are designated as having Special Amenity value and generally protected under the Resource Management Act and local authorities are required to have particular regard to maintaining and enhancing the landscapes because of their unique visual, historical, recreational and aesthetic value.

Despite the designation and requirements under the RMA, WND has chosen to undertake earthworks which destroy the majority of the lower and mid-levels of the sand dunes, and only protect the sand dune ridges/tops, representing a significant adverse breach of the designation status and to the character of the landscape and dunes. The destruction of the lower and mid sand dune areas are justified by WND in order to provide on-site infill for building up soils and earth for the low-lying eastern areas of the site – this justification is only to the benefit of WND to reduce imported infill required on the eastern and low-lying areas of the site, and to maximise the number of lots on the site.

Bulk earthworks are material, significant and adverse to the site covering some 93 hectares of the site (67%) and roughly 90% of the site excluding the wetland: topsoil stripping 139,000 cubic metres (cm), cut volume 1,210,000cm, fill volume 1,145,000cm, peat removal 475,000cm. To put this in context, the cut volume represents in the order of 15,000 – 25,000 truckloads of infill or in the order of 10 to 20 truckloads per lot achieved.

The report of Local Landscape Architecture Collective Ltd (Appendix 22) commissioned by WND explicitly concludes, 'the proposal presents a high degree of change to the site' and its figure 2 perfectly illustrates that only small elements of the dunes are retained (ridgelines).

It cannot be anything but the case that the Project which changes the character of roughly 90% of the site, maintains only the dune ridgelines/tops of the SAL dunes, and requires bulk earthworks of such size and magnitude is adverse and significantly adverse.

If the WNDP is consented/approved, such consent should be sympathetic to the Special Amenity Designation by requiring a protection condition from earthworks and build-out for a greater proportion of the natural dunes landscape, including the mid and lower dune sections. Such a condition would still enable a significant proportion of the site to be developed as envisaged by WND. In addition, WND should be required to bring-in soils and other materials to level out or raise the low-lying eastern areas rather than plunder the existing western sand dunes.

Visual Impacts

The visual impacts are assessed in the SA as low to moderate to neighbours. This significantly understates the position, given the earthworks, landscaping, construction activities and final urban design densification is significant compared to the status quo. The current visual aesthetic is of grasslands, pastures, low, mid and tops of sand dunes. These elements will be replaced by roads, pavements, lighting, fences and residential dwellings. This represents a significant change in visual effect, which can only be adverse, both during the 10–15-year construction period and once completed – not a low to moderate change as contended by WND and its advisers.

The key opportunity to reduce visual effects is to reduce the density of housing on the site, maintain the existing western sand dunes intact, provide for a greater level of open space, and the early planting of a minimum number of mature native trees in strategic locations to minimise future visual impacts. If the WNDP is consented/approved these conditions should be added to the list of conditions.

Urban Design Sustainability and Technology Choices are Adverse

Fresh Water & Waste-water Infrastructure

The WNDP refers to a new water reservoir planned to be built by KCDC in the future which would support the additional fresh water requirements of WNDP. However, water resources in the district are already under pressure from existing demand, the capacity of the Waikanae and Otaki Rivers, and climate change, and there is no certainty that the additional reservoirs will be built.

The surrounding area of the WNDP site is Pekapeka, and as we understand it, all or most of the Pekapeka area properties are limited by KCDC to trickle supply water (roughly 1,000 – 2,000 litres per day) and are therefore required to install their own freshwater storage tanks, rooftop collection or bores to supplement supply.

WNDP refers to connection to KCDC waste-water systems and will increase KCDC overall sewerage disposal requirements by around 5% (1,200 properties out of ~23,000 district properties), and a much higher percentage for the Waikanae Water Treatment Plant, putting further pressure on existing facilities. As for water infrastructure above, all or most of the WNDP site neighbours are required to provide for their own waste-water treatment with individual property waste-water plant.

Formative in its peer review for KCDC notes explicitly that the WNDP does not appear to have been contemplated in KCDC own housing development plans and so should be considered as additive to KCDC's fresh water requirements sourced from the Waikanae River. The conclusion by WND that adequate water resources are available and the WNDP will leverage the economic benefit of KCDC by using existing and planned KCDC water infrastructure investments is unproven and not persuasive.

If the WNDP is consented, it should be a condition that WNDP is imposed the same restrictions on fresh water and waste-water as its immediate Pekapeka neighbours and in so doing would need to provide for on-site/individual property water storage (and potentially rooftop collection and bores to supplement supply constraints) and waste- water treatment. This would also mean that KCDC is reducing its vulnerability to fresh water supply risk, climate change, mitigating future fresh water and waste-water capital expenditure requirements, and leave available capacity for in-fill housing where on site water storage and waste-water treatment is less practical, enabling KCDC to still achieve future asset productivity and efficiency.

The logic to allow water infrastructure capacity for in-fill rather than greenfield is further supported by recent Auckland City Council decisions to favour intensification near the city because this is where people predominantly want to live, and leverages services near the centre.

In our opinion the WND Project is significantly adverse to the regions fresh water and waste-water infrastructure and future supply/demand requirements, with no mitigations.

Stormwater and Flooding Effects

As shown by WND, the stormwater and flooding issues of the site are significant and flood prone for 2-year to 100-year events. Figure 51 of the SA illustrates the existing flood hazard risk for a 100-year return period, where a majority of the site intended for building is flood prone. Changing the existing ground conditions from grass and trees to hard surfaces of roads, pavements and residential dwellings will have the effect of significantly and adversely increasing already flood prone areas of the site and potentially neighbours. WND propose to mitigate the flood risks by a mixture of on-site earthworks to change the landscape, design swales, bunds, weirs and culverts. Once the Project has been completed a considerable portion of the site will switch from free draining sand with heat dissipating plants, to impervious asphalt & concrete – massively reducing the ability of the area to drain or shed heat. The effects of this are likely to get worse with climate change.

A practical and rationale assessment of the existing flood prone situation of the site, indicates that significant caution should prevail in consenting high densification on the WND site. It is also evident from many recent national flooding events where residential property and other infrastructure is significantly impacted, that environmental planners/ modellers have failed to adequately plan and design for the inherent risks. Accordingly, flood risk from densification and the planned infrastructure remains a significant adverse risk to the occupiers of highly densified property on this site and to its neighbours.

Carbon Footprint

The WNDP has a significant carbon footprint impact and few if any significant mitigations. This site is currently agricultural pastures with some native and exotic trees, wetlands and sand dunes. The buildout of the site with around 1,200 properties and related road and other utilities presents an adverse increase in carbon footprint from the construction activities and permanence of the residential properties and related infrastructure.

WND claim it is enhancing the ecological attributes of the site – such claims make little sense when, for example, it is very observable from figure 31 and 33 – 37 of the SA that the majority of the site is developed/built-out and new ecological or enhanced areas or native tree planting are minimal.

In respect to transport effects, carbon emissions impacts from WND greenfield housing will be multiples worse than in-fill solutions, due to the distance from main centres, whether that be Waikanae, Paraparaumu, Porirua or Wellington.

Any consent/approval of WNDP should seek a more neutral carbon footprint by requiring enhanced carbon neutral conditions such as: a significant increase in green/open space areas for native plantings/carbon offsets to recognise the initial embodied and operational carbon, solar rooftop installations to create energy self sufficiency, promote clean energy solutions and avoid carbon emissions by banning non-clean energy heating.

Traffic Impacts are Significantly Adverse, and Mitigations Highly Speculative

WND's integrated traffic assessment (ITA) identifies an increase of traffic in the order of 10,000 vehicles per day (VPD), which compares to current levels of traffic on the Pekapeka and Paetawa roads of between 1,000 and 2,000 VPD, which equates to an increase of around 5 times current traffic volumes on the 2 local roads, assuming a 50/50 split. This represents a significant and adverse increase in local traffic volumes with noise, visual, safety and carbon effects. The WNDP includes very limited mitigations of the significant effects.

Furthermore, the ITA determines that only 35% will use the Paetawa Rd/TeMoana Rd/Waikanae Beach access road to the expressway. The 35% allocation defies practical logic as traveling south from the site location to link up with the Kapiti expressway or traveling from the south to the site, the majority of drivers will use the shorter access route through Paetawa Rd/ Rutherford/TeMoana Rd, rather than the longer route via state highway 1 and Waikanae township to then join up with the expressway.

WND's ITA refers to public transport (PT) bus connections nearby the site or new Metlink routes servicing the site – these are highly speculative. The reality is that current Metlink services do not service Pekapeka Road or Paetawa Rd, and it is hard to believe that there is or would be in the foreseeable future a business case for Metlink to extend or increase services to or alongside the site in the short to medium term, given the paucity of new PT services introduced by Metlink in recent years, and the overall constrained economic position of GWRC which runs PT in the region.

WND's ITA indicates a significant and material increase in local traffic volumes with no realistic mitigations. A development of the scale proposed by WND should require a condition that WND negotiate and agree with NZTA approval and build-out of a new PekaPeka expressway south exit, north entry to PekaPeka Road, as originally planned by NZTA for the Pekapeka expressway connection, rather than creating significant effects for local roads.

Economic Benefits and Contribution to Housing Supply are Significantly Overstated

The rationale for the WNDP and justifications for the development appears to be heavily weighted by and supported by the Projects economic benefits rationale and contribution to the housing supply. The WND submission includes two largely conflicting reports on these aspects: for WND a report by Urban Economics (UE) and a peer review of that report, commissioned by KCDC, from Formative which concludes the shortcomings in the UE report as material. If the quality assurance process or peer review undertaken by Formative reached such an adverse conclusion on WNDP's economic benefits then it follows that significant doubt hangs over the economic benefits which are a key pillar of the SA.

Bal Mathieson (BM) in his opinion (Appendix 39) for WND references the intent and purpose of the FTAA, and other expert panel determinations for housing projects. We note that BM's opinion is made solely for the benefit and support of WND, and that contrary views and interpretations may be possible, and the merits and factual context of each application under the FTAA may be quite different. We also believe that BM's opinion in paragraphs 25 – 27 maybe capable of counter argument.

Whether you believe the UE report or the Formative report, the economic rationale and contribution to housing supply aspects of the WNDP as presented by WND appear somewhat cloudy, potentially misleading, lack relative measure, and therefore lack the necessary robustness and credibility to be persuasive. We examine some of the economic rationale below from a regional perspective.

Contribution to Gross Domestic Product (GDP) and Jobs

The contribution to GDP is referred to at $261m for construction, $58m for primary industry and up to 1,600 jobs. Putting aside the lack of robustness of assumptions and calculations noted by Formative, the quantities and numbers determined by WND and UE are not significant or material. The numbers referred to are generated over the 10-15 years of construction, so assuming a mid-point of 12.5 years, to get a relative context the amounts need to be divided by 12.5 to yield annual amounts. Doing so results in a combined GDP contribution of $26m per annum (pa) and jobs of 133 pa. Whilst these might be meaningful, they are not significant in the context of KCDC regional GDP or job numbers. For example, the broader Wellington (GWRC) region GDP pa is around $56B and KCDC is around $3B, meaning the Projects regional GDP contribution pa is around 0.05% for GWRC and less than 1% for KCDC, and with around 23,000 employed persons in KCDC, the job creation is around 0.6%. The regional economic benefits can only be considered low or minor, and less so nationally.

Housing Supply and Affordable Housing

WND asserts that the Project is highly accretive to the housing supply and affordable housing choices in KCDC and that this is demonstrated by the studies and report of UE (Appendix 29 of SA). Meanwhile the Formative report (also Appendix 29) indicates potential flaws and weaknesses in UE data analysis and conclusions. Perhaps the most significant element of this is the analysis of future supply measured, in years, where the Formative analysis notes the exclusion of 2 important areas of data: the exclusion of green-field developments of less than 50 dwellings, and the exclusion of potential future planned developments which are not yet consented, but part of an existing development area. As noted by Formative, changes to these data sets and assumptions will show a much different picture of the housing supply position. Formative (3.3.2 page 8) conclude the sufficiency analysis is critically flawed.

Housing Affordability

The WNDP includes 1,200 lots with average house price indicatively split into 4 categories: $750,000, $820,000, $930,000 and $1,160,000, and $/per square metre ($psm) sale price of $5,000 to $6,250. WND assert that the WNDP will improve affordability for low-middle income earners and be less expensive than competing options. These benefits appear unproven and arguments non-persuasive.

Dwellings in the lowest average price bracket of $750,000 per unit represent a cost of $6,250 psm (120 GFA) and are the most expensive psm on the site, reflecting very poor value for money outcomes. Furthermore, there are only 35 of the lowest priced units, and these units make up only 3% of the total site units. Ironically, the highest average priced units of $1,160,000 total 135 units and make up 11% of the units.

70% (828) of the WND dwellings/units have average prices of $930,000, which are 20% more highly priced than the average house price in KCDC of around $780,000 and these 70% of dwellings at the site represent around 11 times and 7 times respectively of the median ($86,000) and average ($137,000) of current household income in KCDC. These multiples compare with 3-5 times annual gross household income adopted generally for house price affordability in NZ.

WND assert that the WNDP will deliver new properties at between $280,000 and $370,000 less than recent average sale prices of surrounding key developments. However, no data or analysis is shown for how the total cost of the WNDP development has been compiled and considerable risk arises from building cost estimates generally in the construction sector and certainty over the 10 – 15 construction period assessed by WND. Nor is there any known information or analysis of amenity, build or landscape quality between the comparable green field sites referred to by WND to enable any meaningful and accurate comparisons, or support the conclusions arrived at by UE and WND on the efficiency of the WNDP and ability to deliver and contribute to a lower cost of housing.

WND and UE state that the cost of greenfield is less expensive than in-fill housing and concludes that the Project adds to affordability in the region. However, this analysis only draws on one year's data (2024) in the study area and an unquantified number of sales, and references as support 2011 study results from major Australian cities. Such a short study period with limited data is unlikely to be sufficiently representative to support an accurate assessment and conclusion, whilst an out-of-date Australian city study is a non-relevant reference point in the context of rural NZ greenfield vs in-fill housing cost.

The matters raised above illustrate clear and obvious weaknesses of the economic and housing benefits asserted by WND. Considerable caution should therefore be taken in relying on the economic and housing benefits asserted by WND, and there are doubts about the credibility and persuasiveness in the arguments presented to support the SA. Furthermore, when relative analysis is applied and assumptions probed, it is clear and obvious that the extent of the regional benefits of the WNDP are largely minor or marginal and national benefits even less.

What would a Better Vision for WND look like?

We are of the view that the current version of the WNDP is poorly developed in some respects and lacks an imaginative 2030 – 2050 sustainable housing vision. Accordingly, it fails to deliver the exceptional lifestyle and recreational opportunities or environmental protections and enhancements asserted by WND.

A better vision for the site would be to integrate the visual and amenity aspects of the residential footprint into the local and existing eco-system by recognising and in-bedding sustainability technologies, reducing the densification, avoiding or minimising landscape (dune) erosion/destruction, more substantive native planting requirements of WND, and by other planning conditions which enables the properties to nestle in and enhance the area and landscape to a much greater extent than proposed by WND.

Conclusion

Examination and analysis of the SA shows that the cumulative impact of the adverse effects are significant and mitigations weak or minor, while the regional and national benefits are low or moderate, and therefore the extent of the adverse effects are out of proportion to the benefits. As set out in the FTAA, the SA should be declined, or significant additional conditions applied before acceptance is justified.

For Kevin and Karen Baker

24 July 2026

Data sources: publicly available or Infometrics NZ