APPENDIX 1

URBAN DESIGN OUTCOMES AND WETLAND AND DUNE RETENTION



Urban Design Outcomes and Wetland and Dune Retention

The purpose of this assessment
This assessment considers the urban design implications of retaining/avoiding existing sand dunes and wetland areas in the Project area, including the extent to which this would affect the ability of the Project to achieve the planned urban form and function anticipated for this land by the Kapiti Coast District Plan and described in the policies for the Metropolitan Centre Zone. I have also referenced national urban design guidance through "People + Places + Spaces" (Ministry for the Environment, 2002) which I consider includes useful direction for decision making at this urban scale.

This assessment does not seek to determine the cultural or ecological values or merits of dune or wetland retention or reclamation, as those matters are addressed by mana whenua and the relevant technical specialists. Rather, from an urban design perspective, it considers the implications of avoiding development within the existing dune areas and wetland footprints, including the consequences for the form, function, connectivity and development outcomes of the wider site.

The assessment is intended to inform the overall planning assessment of whether avoidance is practicable, rather than to determine that question in isolation. The urban design consequences identified below are therefore to be considered alongside the ecological, engineering, transport, economic, cultural, and other relevant considerations in reaching an overall conclusion on practicability.

The nature of urban design practice
For the purpose of this assessment, urban design outcomes at this design/development scale are considered broadly and include generally well accepted principles such as:
- connectivity (including walkability and other travel modes)
- legibility (hierarchies, wayfinding, comfort)
- efficiency (land use and transport; infrastructure, economic feasibility)
- identity (through placemaking and contextual response)
- diversity (choice, equity, resilience)
- safety

The Urban Designers Institute Aotearoa (UDIA) defines urban designers as:
- trained and experienced professionals engaged in the multi-disciplinary design and decision-making processes of influencing change to the urban environment;
- having expertise in the organisation, efficiency, layout, form and function of urban environments, and apply specialist design skills to optimise its quality and performance;
- identifying and responding to issues and challenges in the environment, developing strategy and assisting with design of the development of the future urban environment;
- recognising and contributing to the scope provided by the relevant statutory framework, current urban design challenges and best practice.

With respect to urban design practice, it directs the focus of urban design evaluation to be limited to whether or not a proposal or project reasonably satisfies the outcomes sought by the relevant statutory document or plan. Best practice urban design outcomes should be relied on to guide the assessment, but should not be the benchmark to be achieved unless the statutory document or plan itself seeks that. As such, while this assessment is undertaken in the context of the above principles, it focuses on the direction provided by relevant statutory documents.

Urban design is essentially a collaborative and integrating discipline. It involves making trade-offs and navigating competing objectives because physical space is finite, and it is challenging to achieve every ecological, social, cultural and economic goal simultaneously.

In his recent book, The Future Embraced (2024), Kobus Mentz, a renowned New Zealand urban designer describes the need for urban designers to:

- resolve competing objectives and enable solutions which are deliverable;
- recognise competing priorities;
- seek a win-win balanced proposal;
- apply a broad approach that addresses multiple objectives; and
- adopt mitigation where a win-win isn't achievable

In this context, this assessment aims to provide a balanced assessment to support the Assessment of Environmental Effects and thereby the resource consent application.



Figure 1 - Mapped dunes and wetlands within the Project Area

KCDC District Plan - Outcomes for the Metropolitan Centre

MCZ-P1 establishes the over arching intended function of the Metropolitan Centre Zone. It anticipates that the Metropolitan Centre will develop as the core of the Paraparaumu Sub-Regional Centre, comprising an integrated and compact core, with the precincts well connected through pedestrian and transport networks and accommodating a broad range of land uses. In Precinct C, it expressly provides for commercial, limited retail and residential activities that do not adversely affect the role, function and vitality of Precinct A.

MCZ-P1 also anticipates "*a large consolidated stormwater management area and, if practicable, wetland to provide flood storage, ecological and amenity values, together with recreational opportunities associated with the Wharemaukū Stream, stormwater management and wetland areas*."

The intended outcome therefore anticipates a balanced approach, with these functions being accommodated and integrated as an extension to the existing town centre.

Whilst a balance of urban development and open space is anticipated, MCZ-P8 expressly enables a higher density of urban built form within the Metropolitan Centre Zone. MCZ-P6 provides for the growth and development of centres in a manner that contributes to their vibrancy, vitality, efficiency and amenity values. It supports development that increases the range of compatible and complementary land uses and activities, supports high levels of access and connectivity, contributes to a high-amenity environment and supports increased residential living opportunities.

MCZ-P10 provides a particularly clear expression of the intended intensity of development. It seeks the greatest intensity of building and activity within the Metropolitan Centre Zone as part of Precincts A, B and C.

This level of intensity is also supported by "People + Places + Spaces" (MfE, 2002) through the principle of "consolidation and dispersal" which "*promotes higher-intensity development around existing or new nodes and lower density on the periphery. This allows local communities, businesses and public transport to be strengthened and resource efficiencies achieved, while reducing environmental impacts on peripheral areas*".

It states:
"*Consolidation is one of the most important steps in helping to revitalise declining centres and bringing life to low-density, single-use areas. It creates critical mass and brings vitality to an area by supporting more business and service activities, greater street life and more movement.*"

The Project Area is not simply an urban edge location where development is one of several possible outcomes. It forms part of the District's highest-order centre and is intended to accommodate a relatively intensive mix of residential, commercial and other urban activities. At the same time, the MCZ Structure Plan identifies existing natural features within the site, including the dunes, for protection. The Structure Plan therefore anticipates both significant urban development and the retention of identified natural features within Precinct C.

The detailed master planning process has required those outcomes to be tested at a site-specific level. If all existing dune areas and wetland footprints are retained in their current extent and configuration, significant portions of the land otherwise available to deliver the planned residential and commercial components of the Metropolitan Centre would be unavailable for development. The consequences extend beyond a simple reduction in development yield and

affect the ability to establish a coherent urban structure, achieve appropriate connectivity and provide the scale, intensity and mix of activities anticipated within Precinct C.

The relevant question is therefore how these potentially competing outcomes can be appropriately reconciled in the context of the site. The urban design assessment assists with that consideration by identifying the consequences of complete avoidance for the planned urban development outcomes, while recognising that the ecological, cultural, landscape and other values associated with the dunes and wetlands must also form part of the overall assessment of whether avoidance is practicable.

Promoting consolidation and intensity with the existing urban area in general, along with within the town centre in particular, can also contribute to long term sustainability by reducing the need for sprawl on the periphery. Accommodating a variety of land uses, particularly high density residential activity, can protect rural and/or productive land outside the urban area, while reducing infrastructure costs per capita. More compact urban areas along with a focus on transit orientated development can increase the efficiency of public transport and promote carbon reductions through reducing private kilometers travelled and greenhouse emissions.

In addition to the sustainability argument, compact urban areas promote vitality and safety. Large unde rused and fragmented open areas in town centres can become "dead zones", suffering from crime/anti-social behaviour and a lack of maintenance or a maintenance cost unproportionate to value.

Precinct C

Under the over arching direction for the Metropolitan Centre Zone, Precinct C is intended to contribute to the vitality and functioning of the Metropolitan Centre. MCZ-P2 provides particularly clear direction for 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" and to provide strong physical connections within the Metropolitan Centre Zone, including active and public transport options. It directs the establishment of complementary activities, including higher-density residential activities in conjunction with commercial activities; and stormwater management that addresses stormwater concerns and, where practicable, also supports ecological and recreational values.

Spatial relationship between the dunes and the wetlands and the Structure Plan

The Project Area is not simply land generally identified for future urban development. It comprises all of Precinct C not just a significant component. And therefore - all the outcomes for Precinct C need to essentially be delivered through this application. The District Plan therefore establishes a relatively specific spatial and functional outcome for this land as part of the future development of the Paraparaumu Sub-Regional Centre.

To understand the potential implications of retaining the dunes and wetlands, **Figure 2** overlays the delineated dune and wetland extent on the Metropolitan Centre Zone Structure Plan.

This drawing shows that:

- there is a discrepancy between the location and extent of the mapped dunes and those on the Structure Plan (potentially due to concessions that enabled development to occur on lower slopes (TBC));
- the eastern dune is constrained by key connections to Precinct B and will constrain efficient roading (with development on both sides) and may alter direct access/sight lines to the future Link Road;
- the proximity and extent of the eastern dune and the wetland area prevents the delivery of the "desired connector" road and the key connection to the community spine on Iver Trask Place, Precinct A1 and thereafter, the train station;
- the western dune disconnects development that is essentially sandwiched between the motorway and the dune;



Fig 2 - Mapped dunes and wetlands in relation to the Structure Plan for the Metropolitan Centre

- the majority of the affected wetland extent occurs within the area identified by the Structure Plan for residential development;
- the existing wetland also occurs within the Kapiti Road frontage area where the Project proposes the large format retail and associated commercial development; and
- the existing wetland interacts with the proposed internal spine road and the development blocks established around that road.

As illustrated by **Figure 2**, the existing wetlands are not confined to those parts of the Structure Plan identified for stormwater management, open space or ecological purposes. Rather, a substantial proportion of the wetland extent occurs within areas identified to develop as an urban environment, specifically residential activity. Retaining dunes and wetlands would therefore remove or constrain areas that the Structure Plan intends as residential and commercial development and consequently, the planned spatial and movement network.

At the scale of the overall Structure Plan, it illustrates that retaining the existing wetlands and dunes would significantly reduce the ability to develop the site in a way that realises the integrated urban structure anticipated for Precinct C.

Figure 3 shows the proposal in relation to the existing dunes and wetlands and the Structure Plan. It illustrates the extent to which proposed development overlaps with dunes and wetland areas.

Residential development areas - wetlands

The most significant overlap with wetlands occurs within the area identified as Residential on the Structure Plan, which contains the majority of the wetland extent affected by the Project.

Given the fragmented distribution of the wetlands within this area, their retention would not simply remove an equivalent area of residential development. It would create multiple undeveloped areas and "gaps" within the built form, with consequential effects on block configuration and efficiency, street frontage, connectivity and the efficient use of the remaining developable land.

Residential development is an important component of Precinct C to reinforce the vitality and functioning of the Metropolitan Centre and make good use of existing transport infrastructure. MCZ-P7 enables medium and high-density residential development in centres where it contributes to accommodating anticipated growth and provides a range of housing types. MCZ-P10 seeks a vibrant, well-connected and safe Paraparaumu Sub-Regional Centre containing a wide mix of activities and specifically anticipates the greatest intensity of building and activity occurring within the Metropolitan Centre Zone, including Precinct C.

The district-wide objectives also reinforce this direction. DO-O3 seeks a consolidated urban form that provides a variety of living and working areas in a manner that supports the function and vitality of centres. DO-O3 also specifically seeks higher residential densities in locations close to centres and public open spaces with good access to public transport.

Within this policy context, requiring retention of all wetland extent within the Structure Plan residential area would have consequences considerably greater than simply reducing the number of dwellings that can be delivered by the Project. It would substantially reduce the ability of a significant part of the Project Area to perform the residential function specifically identified for it by the Structure Plan.

It would also fragment the developable area and constrain the ability to establish a coherent residential neighbourhood comprising an efficient block structure, connected streets and pedestrian routes, appropriate interfaces with public open space and other activities, and sufficient residential intensity to support the wider Metropolitan Centre.

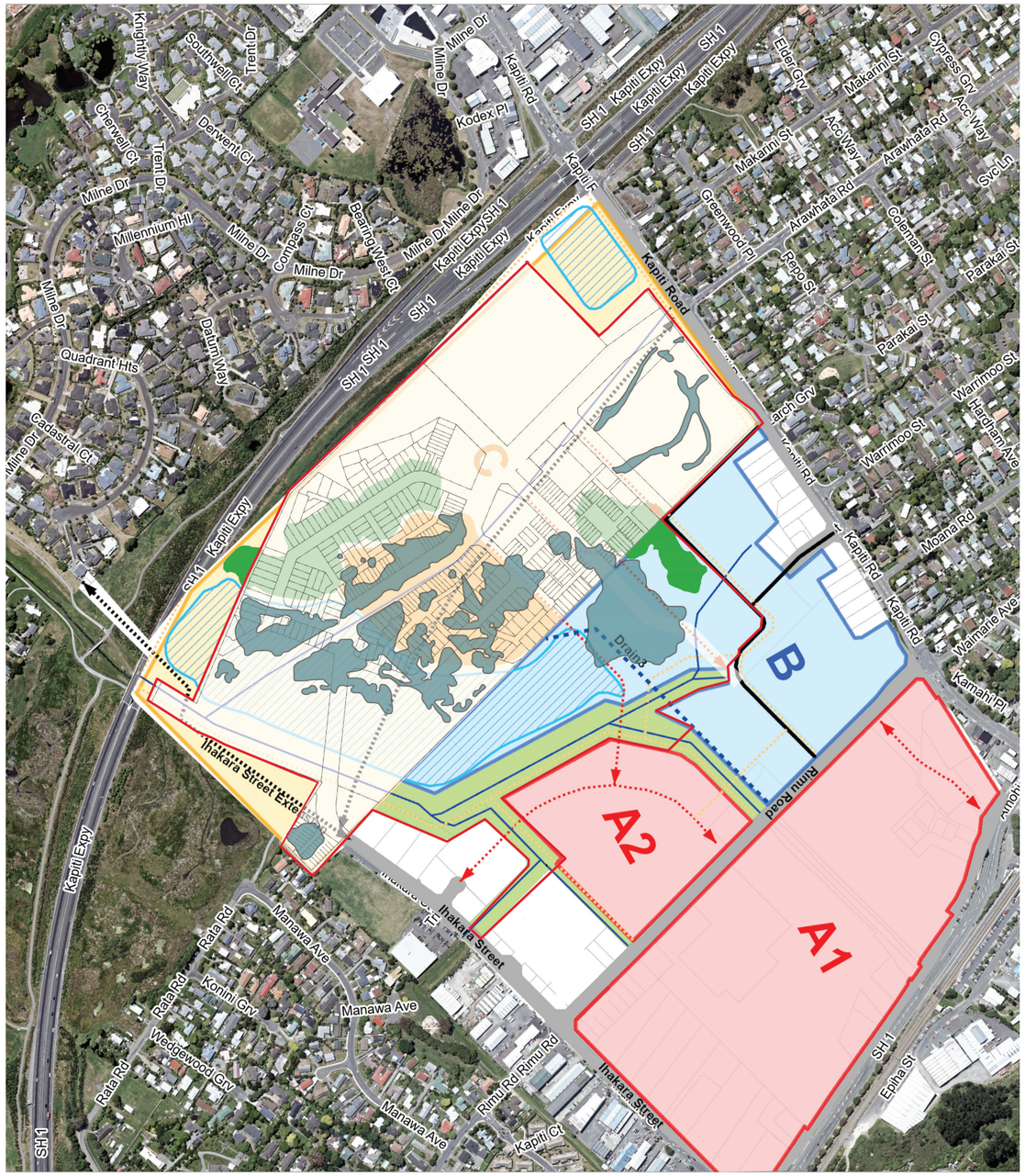


Figure 3 - Wetlands + Structure Plan + Proposal

Residential development areas - sand dunes
The Project includes the removal of the eastern sand dune and the removal of the western sand dune and the "re-establishment" of a raised western land form in a similar location (closer to the motorway). Technical input on the retention or removal of sand dunes includes:

- **Engineering** - given the geotech conditions, the sand is needed to enable the construction of urban infrastructure and requiring the import of sand would render urban development financially inviable
- **Landscape architecture** (extracted from the Landscape and Visual Assessment):
  "The western dune is the most prominent topographical feature within the site. Its height and form provide spatial definition along the northern edge of the site and contribute to physical and visual separation from the Kapiti Expressway. The physical influence of the smaller eastern dune is more confined but still provides some topographical variation. While the dunes retain the site's underlying coastal characteristics, both the site and the wider receiving environment have undergone substantial modification. The landscape value is therefore primarily at a local and site scale, rather than as features of wider landscape significance. Although not of district-wide landscape significance, the two dune landforms have a greater degree of value at the site and immediate-neighbourhood scale than their size alone might suggest. They provide a distinctive remnant of the wider coastal dune system, contrast with surrounding urban development, and function as a local backdrop, landmark and physical/visual buffer between the site and the Kapiti Expressway."

  At present the dunes are covered in exotic scrubland species, with large areas of gorse. The landform will be replanted with native vegetation and integrated into the development, improving biodiversity and increasing native vegetation, contributing to a more consistent green space network through the development.

  Overall, it is considered that the proposal supports urban form while recognising and managing the landscape and amenity values of the site. In summary, the proposed approach is a practical solution which still provides for localised topography 'interest' balanced with creating a new metropolitan centre.

The Interim **Cultural Impact Assessment** by Ātiawa Ki Whakarongotai Charitable Trust in not supportive of the proposed removal of the two sand dunes as this "is fundamentally inconsistent with the cultural, spiritual and environmental outcomes sought by Ātiawa".

As described in the introductory section of this assessment, urban design practice is essentially tasked with balancing sometimes competing objectives and seeking solutions that meet as many project and statutory objectives as possible.

With respect to the direction in the District Plan of how to respond to the sand dunes, I note that there is an acknowledgement that they may unduly effect the practical development of the site:

CE-P7 - Natural Dunes - Natural dune systems will be protected and enhanced (including through restoration) and natural dune function will be enabled ***where practicable****.*

MCP-2 -Precinct C - 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 mitigated or offset by environmental enhancements within Precinct C that are commensurate with the scale of the adverse effects.*

While CE-P7 generally seeks the protection and enhancement of natural dune systems, MCP-2 provides the more specific policy direction for the dunes within Precinct C. It expressly requires avoidance only to the extent practicable, having regard to the development outcomes provided for in Precinct C. This assessment therefore considers the urban design and development consequences of complete dune avoidance to inform that practicability assessment.

Kāpiti Road commercial and large format retail area
Wetlands also occur in areas adjoining Kāpiti Road where the Project proposes large format retail and associated commercial activities, both of which are considered by the MCZ policies to be complementary and compatible with the role and function of Precinct A as the primary retail and commercial core.

The proposed location of large format retail adjoining Kāpiti Road responds to careful urban design analysis of the site and its location. It enables these activities which have particular access, visibility and servicing requirements to be accommodated within Precinct C, while allowing Precinct A to function as the more intensive town-centre type retail. It also reduces the potential visual dominance and traffic effects on residential neighbourhoods. It relates well to the established urban character of Kapiti Road further to the west where other large format areas are located and well served by Kapiti Road itself which performs an arterial function, carrying and distributing large volumes of traffic. Development of this scale would also be relatively compatible with that of the existing Aquatic Centre located on the site's eastern boundary. Retaining substantial parts of this area as open space would reduce both the ability of Precinct C to contribute to and extend the mix of activities and employment opportunities in the Metropolitan Centre as well as leverage the access provided by Kāpiti Road.

Connectivity – the Link road and development structure
The issue of connectivity is a fundamental urban design consideration. It is widely acknowledged that high levels of physical connectivity facilitate ease of access, economy of movement and improved social interaction.

"Connected street systems give people choices. Having roads that are joined together in a network, rather than ending up in cul-de-sacs, makes it easier for all people – children, teenagers, the elderly, as well as other adults – to get around their neighbourhood. This helps integrate communities and overcome isolation. Connected street patterns:

- *facilitate movement and exchange while spreading traffic loads*
- *make places safer and more alive by bringing activity and passive surveillance to an area*
- *make walking and cycling more enjoyable and convenient*
- *reduce dependence on motor vehicles*
- *help ensure traffic and roads do not divide communities.*

Ensuring new areas are designed with a high degree of connectivity, and improving connectivity within existing urban areas by adding new links and completing missing links, helps support the concentration of activities and a greater diversity of activities."
From: People + Places + Spaces, by Ministry of the Environment 2002

The proposed Link Road (Road 1) establishes the primary movement route through the site and establishes the proposed development blocks and their connection with Kāpiti Road and Ihakara Street and thereby, the wider Metropolitan Centre. It provides for greater connectivity and movement resilience at the town centre level while also providing for internal access

and connectivity, linking proposed residential areas to the community heart, public reserves and other destinations. As such, it considered an efficient movement corridor, serving multiple functions while supporting the development of a range of land uses along it.

The retention of all wetland areas (and potentially sand dunes, depending on the alignment of the Link Road) would reduce and fragment development along the Link Road, and consequently the intensity and diversity of adjoining urban activities as well as the roads overall efficiency. Creating a transport corridor through an underdeveloped part of the Metropolitan Centre rather than an integrated urban street supporting residential, commercial and other centre activities would result in a road without spatial definition or the pedestrian and cycle safety and comfort provided by built form overlooking it.

Iver Trask Place extension and integration with the existing centre

The proposed extension of Iver Trask Place has been identified as an important linkage to the existing town centre and the proposal has future-proofed this route and reinforced connection between existing and future public facilities and destinations.

MCZ-P2 and MCZ-P9 support this outcome through direction to complete missing transport links and integrate new development with the surrounding context. Again, however, the value of such a connection from an urban design perspective does not arise simply from providing a transport route. Rather, its legibility, amenity and safety is derived from the activities and development that establishes along it. Accordingly, the Project proposes a connecting street with high pedestrian and cycle amenity and safety, delivered through shared paths, active residential (and potentially retail) frontages and quality landscaping. If significant lengths of this link remain undeveloped as a consequence of complete dune retention and wetland avoidance, the potential success of this key spatial connection between the site, the existing cluster of public facilities (Library, District Council, Aquatic Centre etc.), future public facilities, the existing shopping precinct and, ultimately, the train station, would be reduced.

National Policy Statement on Urban Development 2020

Plan Change 2 to the District Plan sought to partially give effect to the NPS-UD, including through its strategic objectives and policies (e.g. DO-O19, O20; O22)

Objective 1 of the NPS-UD (and beneath that, DO-O20 of the KCDC DP) seeks 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.

Policy 1 provides further direction as to the characteristics of a well-functioning urban environment. Of particular relevance to the Project, this includes urban environments that have or enable a variety of homes that meet the needs of different households; a variety of sites suitable for different business sectors in terms of location and site size; good accessibility between housing, jobs, community services, natural spaces and open spaces, including by way of public or active transport; and land-use patterns that support reductions in greenhouse gas emissions.

These matters reinforce the importance of considering the Project Area as an integrated urban environment rather than simply as a collection of independent development parcels. The co-location of residential development, commercial and employment activities, open space and transport connections within the Metropolitan Centre is directly relevant to achieving the accessibility and land-use integration contemplated by Policy 1.

The proposed movement network is only one component of a well-functioning urban environment. Its effectiveness depends upon its integration with the residential, commercial, employment, recreational and open-space activities that it connects.

A development scenario in which the planned connections through the site are provided but significant adjoining areas cannot accommodate the residential and commercial development anticipated by the Structure Plan would materially reduce the ability of this part of the Metropolitan Centre to perform as a well-functioning environment. It could result in substantial investment in a through-site movement network while leaving significant adjoining areas unavailable for the residential and commercial activities that the network is intended to support. That would compromise the ability to achieve the compact, integrated and intensive centre anticipated by both the NPS:UD and the District Plan.

The NPS-UD also places specific emphasis on providing sufficient development capacity for both housing and business land. Objective 2 seeks, at all times, at least sufficient development capacity to meet expected demand for housing and for business land over the short, medium and long term. The proposed development provides a substantial residential component within land specifically identified by the Structure Plan for residential development. It also provides land and floor space for large format retail, commercial and other centre activities.

Urban Design Value of Natural Site Features
Best practice contextual analysis and design also recognises the value of the natural environment in placemaking and includes the identification, protection and enhancement of land form, significant vegetation, drainage corridors, overland flowpaths and wetland areas for both passive recreation and environmental value (biodiversity, flood resilience etc.).

"Designing urban areas so they reduce the impacts of urban activities on the environment – such as mitigating stormwater pollution, improving energy and water efficiency and reducing greenhouse gas emissions – makes these areas more sustainable.

Environmental responsiveness is also a key way of developing character and identity. The strong natural landscapes our towns and cities are set in are an important influence on their distinctiveness.
From: People + Places + Spaces, by Ministry of the Environment 2002

The project site includes both sand dunes and wetland areas that are identified as both constraints and opportunities for urban design response. Both the elevated land form and the wetland areas reflect the site's unique location and history and provide opportunities for identity and amenity in the site's development.

On a site such as this, there is an inherent tension between retention of existing natural features and the urban design outcomes sought for Precinct C, including connectivity, legibility, safety, development intensity and an integrated urban form. The appropriate urban design response therefore requires consideration of both the value of these existing features and the consequences of their retention for the wider development.

From an urban design perspective, the proposed modification and removal of the existing dune and wetland areas enables:

- greater intensity and density of development, supporting the function and performance of the Metropolitan Centre;
- stronger and more legible connections with the wider town centre;
- a more connected local urban form, promoting legibility and safety;
- establishment of a new raised landform which references the existing topography, buffers residential areas from the Expressway and provides a variety of living environments and views towards Kāpiti Island and the Tararua Range;
- establishment of native planting which contributes to biodiversity, landscape character and identity;
- safe and legible public access through a connected open-space and recreation network; and
- enhancement of the Wharemaukū Stream and establishment of a connected wetland system which, together with the proposed landform, stormwater devices, reserves, playgrounds and pedestrian connections, establishes an integrated green-blue network through the development and provides for the expression of natural processes.

Summary and Conclusion
In my opinion, the full retention of all sand dunes and existing wetlands would have a cumulative negative effect on the urban structure and design outcomes of the Project. It would significantly reduce the residential population, and reduce commercial activity that would otherwise occur within the Project Area, and would also reduce the efficiency and performance of the movement network by diminishing opportunities for street activation and pedestrian safety and activity. In turn, this would reduce the ability to support the existing town centre and constrain the achievement of the compact, integrated and intensive Metropolitan Centre outcome sought by the relevant District Plan provisions, national policy and national urban design guidance.

Importantly, this conclusion is not based simply on a desire to maximise development yield. Rather, it reflects the spatial and functional consequences of removing significant areas of planned residential and commercial development from an integrated Metropolitan Centre structure.

The appropriate urban design response is therefore to seek a balanced and integrated outcome across the Project Area that responds to these competing objectives and priorities.

The Project responds to this at the broader site scale by providing a substantial consolidated area for flood storage, stormwater management, wetland creation and ecological enhancement, together with the retention and enhancement of the Wharemaukū Stream corridor and associated open-space network. From an urban design perspective, this area is considered an important asset for the future community while fulfilling important stormwater management and water quality functions, providing opportunities for passive recreation, green outlook and contribute to overall character, identity and amenity. It enables other parts of the site to perform the residential, commercial and connectivity functions required to make good use of this land resource in the District's highest-order centre and support the existing town centre and public transport services.

The majority of the affected wetlands occur within the area identified by the Structure Plan for residential development. Further wetland areas affect the Kāpiti Road commercial/ LFR development area and interacts with the Link Road, Iver Trask Place extension and the development blocks established around that movement network.

The location of the affected wetlands is particularly significant from an urban design perspective. Avoidance within the Structure Plan residential area would directly constrain the ability of that land to perform the residential function identified for it and would reduce opportunities for higher-density residential living. Similarly, retention of wetlands within the Kāpiti Road commercial/LFR area would constrain the ability of that area to accommodate the commercial activities anticipated within Precinct C in a logical and integrated manner. Removing development from areas adjoining the Link Road and Iver Trask Place connection would also reduce the activation, effectiveness, safety and amenity of these key connections. Similarly, retention of the existing dune landforms in their current extent and configuration would reduce the ability to establish legible and efficient connections between development within the Project Area, the existing community precinct and the wider town centre.

In relation to the wetlands, full avoidance would materially constrain the residential and commercial development anticipated by the Structure Plan and would adversely affect the integration, activation and performance of the proposed movement network. From an urban design perspective, the proposed development pattern, together with the consolidated wetland, stream and open-space network, provides a substantially better integrated urban outcome than the full-avoidance scenario assessed in this appendix.

In relation to the dunes, retention of the existing dune landforms in their current extent and configuration would constrain connectivity, development intensity and the ability to establish a coherent urban structure across Precinct C. These consequences are directly relevant to the consideration under MCP-2 of the extent to which adverse effects on the dune system can practicably be avoided having regard to the development outcomes provided for in Precinct C.

These urban design findings should be considered alongside the ecological, landscape, engineering, transport, economic, cultural and other relevant considerations in the overall assessment of the Project.

For: New Central Park Ltd

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