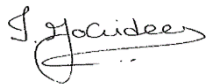


Comments on a substantive application under section 53 of the Fast-track Approvals Act 2024

Waikanae North Development

Document control

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Executive summary

1. Wellington Regional Council (Greater Wellington) acknowledges that the Waikanae North Development Project, if approved by the Panel, is likely to result in benefits that include the staged residential subdivision of approximately 1,200 lots including a local centre.
2. Greater Wellington considers that there are some outstanding issues with the substantive application but considers that these issues can be addressed by the provision of information, appropriate conditions, or other amendments to the proposal. Greater Wellington considers that addressing these issues is necessary to ensure that the proposal, if approved, would not be contrary to the provisions of the Natural Resources Plan (NRP), Regional Policy Statement (RPS), and other relevant planning instruments including the National Policy Statement for Freshwater Management (NPS-FM).
3. On 04 and 05 June 2026 Greater Wellington met with the Applicant to discuss and attempt to narrow areas of disagreement regarding ecological and hydrological issues. This has led to a narrowing of areas of disagreement, and some agreed approaches to address outstanding areas of disagreement.
4. A summary of the of the issues identified and resolutions suggested by Greater Wellington is set out Table 1.

Table 1: Summary of issues identified by Greater Wellington and suggested resolutions.

Summary of issues	Summary of Greater Wellington suggested resolutions
Issue 1: Wetland Loss and Offsetting	The applicant should demonstrate the effects management hierarchy has been applied and that compensation will only be provided when offsetting is not possible.
Issue 2: Functional need and effects management hierarchy for stream reclamation	The applicant should demonstrate that the proposal aligns with the requirements of Regulation 57(2) of the National Environmental Standards Freshwater (NES-F).
Issue 3: Classification of watercourses	The site watercourse classifications should be reconsidered in light of Greater Wellington's watercourse classification guidance. The scope of the application should be amended to seek consent for the reclamation of these watercourses.
Issue 4: Stream Ecological Value (SEVs)	The post-development SEV calculations should be provided to the Panel and Greater Wellington for review and comment.

Summary of issues	Summary of Greater Wellington suggested resolutions
Issue 5: Hydrology	- Information should be provided to address the remaining uncertainty relating to: - Developing a management approach to ensure water levels are appropriate for ecological planting plans and proposed earthworks for wetlands and riparian corridors. - The possible establishment of an eco-hydrological monitoring plan. Greater Wellington would welcome the opportunity to participate in further conferencing on these matters and associated conditions.
Issue 6: Stormwater Discharge	Information should be submitted to demonstrate the application is consistent with Policy 83(e), and remaining uncertainty should be resolved prior to granting of consent or resolved via appropriate conditions.
Issue 7: Vesting of Stormwater Infrastructure Stormwater	In-principle approval for the vesting of stormwater infrastructure should be obtained from KCDC prior to a decision being made on the application.
Issue 8: Erosion and Sediment control	- Conditions of consent should be applied to ensure that: - The management plan structure is clear and that the purpose of the plans is defined. The consent conditions should also ensure that the information required in each of the plans is specified. - Stage Specific Erosion and Sediment Control Plans (SSESCPs) be prepared in accordance with the with Greater Wellington Regional Council's "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" and be submitted to council for certification prior to earthworks commencing. The condition should also list the information which needs to be included in the SSESCP's. - The progressive stabilisation of the site and to ensure that the stabilisation techniques

Summary of issues	Summary of Greater Wellington suggested resolutions
	implemented are suitable for the soil types, time of year and climatic conditions.
Issue 9: Flooding Effects	• The applicant should provide updated flood hazard mapping and comment on duration of road inundation. • Conditions should require that the modelled blockage scenario for the twin barrel culvert be tested during detailed design to confirm that the culvert can operate as intended • Conditions should be applied to ensure that the detailed design for flood protection infrastructure includes maintenance requirements (including design life) and how maintenance will be carried out (for example, where sediment and debris can be removed). • Details of the climate scenarios, sensitivity analysis and emission pathways used in flood modelling should be provided.
Issue 10: Regional and public transport	• Greater Wellington considers that there should be further discussion between the Applicant and Greater Wellington in order to address: ○ Impacts on park and ride facilities at Waikanae; ○ Effects on the existing public transport services within the area; ○ Creation of an expectation that the development may be serviced by a bus service, in the absence of adequate infrastructure or funding for a new service.

Overview and scope

Overview

5. This document sets out Greater Wellington's comments on the substantive application for the Waikanae North Development project under section 53 of the Fast-track Approvals Act 2024 (the Act).
6. This document is structured as follows:

- a. **Overview and scope:** this section sets out the scope of Greater Wellington's comments on the application;
- b. **Pre-comment engagement:** this section records Greater Wellington's position on the pre-lodgement engagement that occurred with the applicant, up to the point where the Expert Panel (the Panel) has invited Greater Wellington to comment on the application;
- c. **Relevant planning documents:** this section sets out the planning documents that are relevant to the project;
- d. **Benefits:** this section sets out Greater Wellington's understanding of the benefits of the project;
- e. **Regional resource consents required:** this section records Greater Wellington's position on the regional resource consents required to authorise the project and the draft resource consent conditions proposed by the applicant.
- f. **Issues:** this section sets out the issues that Greater Wellington has identified with the substantive application, and sets out resolutions to these issues for the Panel to consider;
- g. **Other matters:** this section sets out other matters that Greater Wellington considers the Panel may wish to be aware of when making their decision;
- h. **Appendices:** Copies of all of the peer reviews and reports undertaken to support Greater Wellington's assessment of the application (including in the time prior to the application being lodged) are attached as appendices.

Scope

- 7. The scope of Greater Wellington's comments on the substantive application is within its statutory functions as a local authority. These functions include:
 - a. Functions relating to the management of natural and physical resources described in section 30 of the Resource Management Act 1991 (RMA), including:
 - i. Preparing the regional policy statement and the regional plan and regional coastal plan;
 - ii. Deciding on resource consents for activities within the region (including the coastal marine area) where consents are required by regulations in a National Environmental Standard or rules in the NRP (referred to as regional resource consents);

- iii. Undertaking compliance monitoring and enforcement of resource consents and permitted activities throughout the region;
 - b. Preparing the Regional Land Transport Plan and Regional Public Transport Plan and providing public transport planning and delivery functions under the Land Transport Management Act 2003;
 - c. Managing a network of regional parks under the Reserves Act 1977;
 - d. Responsibilities for managing rivers and flood protection assets across several river catchments and floodplains throughout the region;
 - e. Functions as the harbourmaster under the Maritime Transport Act 1994;
 - f. Developing and implementing pest management plans and monitoring biosecurity threats under the Biosecurity Act 1993;
 - g. Integrating climate adaptation, supporting emissions reduction, and monitoring climate impacts under the Climate change Response Act 2002.
8. Within the scope of its functions as a local authority, Greater Wellington and its experts have considered the substantive application within the time available for the purpose of identifying issues and suggested resolutions for the Panel to consider when deciding on the substantive application.
9. For the avoidance of doubt, Greater Wellington considers that its comments are matters that decision-makers may have regard to under section 104 of the RMA (including any other matter under section 104(1)(c) of the RMA).
10. Table 2 sets out those who have participated in the preparation of these comments on behalf of Greater Wellington.

Table 2: Persons involved in the preparation of comments

Planning	Joshua Knowles, Senior Resource Advisor, Environmental Regulation, Greater Wellington and Katherine Greenaway, Resource Advisor, Environmental Regulation, Greater Wellington.
Hydrology	James Blyth, Water Scientist and Director, Collaborations.
Wetland Ecology	Melanie Dixon, Principal Ecologist, Collaborations.
Stream Ecology	Dr Gareth Taylor, Environmental Projects Consultant & Director.
Stormwater	David Wilson, Principal Engineer & Director, The Urban Engineers.

Earthworks	Gregor McLean, Director/ Environmental Consultant, Southern Skies Environmental.
Flooding Effects	Kirsty Duff, Senior Engineer, Flood Advisory, Greater Wellington.
Regional Transport and Metlink Strategy & Investment and Network & Customer teams	Catherine Knight, Principal Strategic Advisor Urban Development, Strategy, Greater Wellington, and Scott Walker Senior Policy Advisor, Strategy and Investment, Metlink.

Environment Court Code of Conduct for Expert Witnesses

11. Where technical experts have provided technical memoranda in relation to the regional resource consents sought, those experts have included a statement of expertise and a statement of compliance with the Code of Conduct for Expert Witnesses (Environment Court Practice Note 2023) within their technical memoranda.
12. While this document is issued under delegated authority, the authors of this document have read, and agree to comply with, the Code of Conduct for Expert Witnesses (Environment Court Practice Note 2023). A statement of expertise for the authors is set out in Appendix 10.

Mana whenua

13. Greater Wellington has obligations to uphold Te Tiriti o Waitangi in exercising its functions (including its functions in relation to the fast-track approvals process) and acknowledges the mana whenua within the rohe where the project is located. Greater Wellington understands that the Panel has invited several mana whenua groups to comment on the application and considers that the Panel should have particular regard to the comments provided by them.

Pre-comment engagement

14. The Applicant commenced pre-lodgement consultation with Greater Wellington in June 2025. Pre-lodgement consultation has included the following activities:
 - a) A briefing on the project;
 - b) A site walkover and workshop with technical experts on 30 July 2025;
 - c) Provision of draft technical information, including:
 - i. Plans - Scheme, Earthworks, Stormwater, Wastewater, Water Supply.
 - ii. Ecological Effects Assessment
 - iii. Lizard Management Plan

iv. Native Freshwater Fauna Salvage and Relocation Plan

v. Infrastructure Report

vi. Geotechnical Assessment

vii. Hydrological Report

viii. Stormwater Management Plan

ix. Erosion and Sediment Control Plan

d) Greater Wellington provided feedback on the draft technical information on 08 August 2025 and subsequently on 05 February 2026.

e) Discussion of rules triggering resource consents on 25 March 2026.

15. On 04 and 05 June 2026 Greater Wellington met with the Applicant to discuss and attempt to narrow areas of disagreement regarding ecological and hydrological issues. The minutes captured from these meetings identify agreed approaches to address some areas of disagreement.
16. On 18 June 2026 Greater Wellington provided written feedback on the Applicant's draft conditions. This feedback is provided as Appendix 1 and Appendix 2.
17. On the 30th of June 2026 the applicant provided a memo to Greater Wellington addressing Peat-to-Sand Replacement -Groundwater Sensitivity Commentary, in response to 4 June 2026 hydrology conferencing meeting. This memo has been considered by Greater Wellington in preparing these comments.

Relevant planning documents

18. The following planning documents prepared under the RMA are relevant to the project:

- a. National policy statements, including:
- i. National Policy Statement for Freshwater Management 2020 (amended December 2025)¹ (NPS-FM);
 - ii. National Policy Statement on Urban Development 2020 (May 2022)² (NPS-UD);

¹ See: <https://environment.govt.nz/assets/publications/npsfm-2020-amended-december-2025.pdf>

² See: <https://environment.govt.nz/assets/publications/National-Policy-Statement-Urban-Development-2020-11May2022-v2.pdf>

- iii. National policy Statement or Indigenous Biodiversity 2023 Amended December 2025
 - b. Resource Management (National Environmental Standards for Freshwater) Regulations 2020³ (NES-F);
 - c. Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1 Appeals Version)⁴ (RPS);
 - d. Operative Natural Resources Plan for the Wellington Region 2023⁵ (NRP);
 - e. Proposed Change 1 to the NRP (including Variation 1)⁶ (NRP-PC1). The rules in NRP-PC1 have immediate legal effect under section 86B(3) of the RMA.
19. The following planning documents prepared under other legislation are also relevant to the project:
- a. Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054⁷ (FDS);
 - b. Wellington Regional Land Transport Plan 2021⁸, including the 2024 Mid-term Review⁹ (RLTP);
 - c. Wellington Regional Public Transport Plan 2025-2035¹⁰.

Benefits

20. Greater Wellington acknowledges that the project, if approved by the Panel, is likely to result in a range of benefits, including:
- a. A benefit to housing supply and availability in the Kāpiti District. The staged provision of approximately 1,200 residential dwellings as well as;
 - i. 11 commercial allotments to facilitate a new local centre,
 - ii. Local transportation and three waters infrastructure

³ See: <https://www.legislation.govt.nz/secondary-legislation/pco-drafted/2020/174/en/latest/#LMS364099>

⁴ See: <https://www.gw.govt.nz/assets/Plans-policies-bylaws/RPS/RPS-Change-1-Appeals-Version-Sep-2025.pdf>

⁵ See: <https://www.gw.govt.nz/assets/Documents/2023/07/CORRECT-Natural-Resource-Plan-Operative-Version-2023-incl-maps-compressed.pdf>

⁶ See: <https://www.gw.govt.nz/assets/Plans-policies-bylaws/PNRP/PC1-home-page-content/NRP-PC1-Full-Plan-Change-Variation-1.pdf>

⁷ See: <https://www.gw.govt.nz/assets/Documents/2025/08/1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf>

⁸ See: <https://www.gw.govt.nz/assets/Documents/2021/10/Wellington-Regional-Land-Transport-Plan-2021web.pdf>

⁹ See: https://www.gw.govt.nz/assets/Documents/2024/07/Wellington-Regional-Land-Transport-Plan-2021_2024-Mid-Term-Review-2.pdf

¹⁰ See: <https://www.gw.govt.nz/assets/Documents/2025/06/Wellington-Regional-Public-Transport-Plan-2025-web.pdf>

- b. Direct and indirect economic and employment benefits. The application sets out that the proposal is assessed as contributing an estimated \$261M to construction sector GDP and to support 1,600 FTE jobs. Further, the application sets out that the proposal will support primary industries through an estimated contribution to primary sector GDP of \$58M, supporting an estimated 355 FTE jobs.
 - c. Ecological restoration measures including a wetland sanctuary, amenity open space, dune restoration and enhancement planting, and restoration of an existing water course.
21. Greater Wellington acknowledges that if the project is fully implemented, the benefits associated with the provision of housing and business land would be generally consistent with the following national and regional planning direction:
- a. Policy 1(a)(i) of the NPS-UD, which relates to enabling housing, and Policy 1(b) of the NPS-UD, which relates to the provision of sites suitable for business activities, subject to the development being undertaken in a manner that contributes to a well-functioning urban environment;
 - b. Objective 22A of the RPS, which seeks that regional housing bottom lines are met;
 - c. Policy P6(j) of the NRP, which recognises the cultural, social, and economic benefits of using land and water for urban development, where it maintains the quality of the natural environment.

Regional resource consents required

22. The relevant planning documents that determine the regional resource consents that are required for the project are:
- a. The NES-F;
 - b. The NRP;

Activity	Relevant rule or regulation	Activity status	Resource consents required	Comments
Earthworks and vegetation clearance				

The use of land for earthworks and vegetation clearance, and the associated discharge of sediment into water or onto or into land where it may enter water from earthworks.	NRP R107	Discretionary	Land use consent (s9) and discharge permit (s15)	The proposed earthworks cannot comply with rule R101 as the earthworks will be greater than 3,000m² per property per 12-month period and within 5 m of surface water bodies. Therefore, consent is required under rule R107 for all earthworks identified in the substantive application.
Rivers				
All other uses of the beds of lakes and rivers including specifically the placement, use, alteration, extension, or reconstruction of culverts in, on, over, or under the bed of any river.	NES-F Reg. 71	Discretionary	Land use consent (s13)	Applies to the placement of culverts. Proposed culverts do not meet permitted activity conditions for culverts set out in NRP R126 and NES-F Reg. 70, and therefore require resource consent under NES-F Reg. 71 and NRP Rule R145.
	NRP R145	Discretionary		
The damming or diverting of water within or from a river.	NRP R147	Discretionary	Water permit (s14)	Applies to the diversion of water within or from a river that does not meet Rules R122, R125, R126, R127, R128, R130, R131, R134, R137 and R138 and R159.
Reclamation of the bed of a river.	NES-F Reg. 57	Discretionary	Land use consent (s13)	Resource consent is required for reclamation of the bed of a river as a discretionary activity under R142 and Reg 57 of the NES-F.
	NRP R142	Discretionary		
Wetlands				
Activities in a natural inland wetland (specifically discharge of stormwater and clearance of indigenous vegetation) including any associated disturbance of land in the natural inland wetland, diversion of water, and discharge of sediment to water.	NRP R117	Discretionary	Land use consent (s13), water permit (s14), and discharge permit (s15)	R117 provides for a range of activities in natural wetlands. The proposal specifically seeks consent under this rule for discharge of stormwater and clearance of indigenous vegetation within natural wetlands.
Activities within natural inland wetlands (specifically the diversion of water into a natural wetland and the reclamation of a natural wetland), that result in the reclamation of	NRP-R118	Non-complying	Land use consent (s13), water permit (s14), and discharge permit (s15)	R118 provides for a range of activities in natural wetlands. The proposal specifically seeks consent under this rule for the diversion of water into a natural wetland and the

natural inland wetlands, including any associated damming or diversion of water, and discharge of sediment to water.				reclamation of a natural wetland.
Activities within an outstanding natural wetland, identified in schedule A3 of the NRP. Specifically including the discharge of water, the diversion of water and the placement of new structures with an area greater than 10m ² in area.	NRP-R120	Non-complying	Land use consent (s13), Water permit (s14), discharge permit (s15)	R120 provides for a range of activities within an outstanding natural wetland, identified in schedule A3 of the NRP. Consent is sought for Specifically including the discharge of water, the diversion of water and the placement of new structures with an area greater than 10m ² in area as non-complying activities under this rule.
Vegetation clearance, Earthworks or land disturbance within, or within a 10 m setback from, a natural inland for the purpose of constructing a wetland utility structure.	NES-F Reg. 42	Restricted discretionary	Land use consent (s9)	Applies to vegetation clearance, earthworks, and land disturbance, adjacent to and within existing natural inland wetlands for the purpose of constructing a wetland utility structure.
Earthworks within a natural inland wetland which results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland and does not have another subpart under regulations 38 to 51.	NES-F Reg. 53	Prohibited	Land use consent (s13), and discharge permit (s15)	The proposed earthworks are for the purpose of Urban Development. However, under regulation 45C(7) resource consent cannot be granted if it occurs on land that is zoned in a district plan as general rural, rural production, or rural lifestyle. The site of the proposed development is within the General Rural Zone and Rural Lifestyle zone in the Operative Kapiti Coast District Plan 2021. Therefore, the proposed earthworks within a natural inland wetland which results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland must be considered as a prohibited activity under NES-F Reg. 53.
Vegetation clearance within, or within a 10 m setback	NES-F Reg. 54	Non-complying	Land use consent (s13), and	Because these activities have no other relevant subpart in

from, a natural inland wetland, earthworks within, or within a 10 m setback from, a natural inland wetland, and the taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland.			discharge permit (s15), Water permit (s14)	the NES (for the same reason identified in the row above). Resource consent is required for these activities as a noncomplying activity.
Stormwater				
The discharge of stormwater from new subdivision and development into water, or onto or into land where it may enter a surface water body, natural inland wetland, or coastal water.	NRP R50	Restricted discretionary	Discharge permit (s15)	The proposed discharge of stormwater cannot comply with R49 of the NRP as it is associated with new urban development with earthworks in excess of a total area of 3,000m ² per 12 month period.
Dewatering				
The take of groundwater and the associated diversion and discharge of that water (including the use of land associated with well pointing) for the purpose of dewatering.	NRP R160	Restricted Discretionary activity	Water permit (s14), Discharge permit (s15)	The proposed dewatering cannot comply with the permitted activity standards under rule R159. Therefore, the dewatering requires resource consent as a restricted discretionary activity under R160.

Issues

23. This section sets out the issues that Greater Wellington has identified with the substantive application. As part of identifying these issues, Greater Wellington has also identified what it considers to be appropriate resolutions, for the Panel to consider.

Issue 1: Wetland Loss and Offsetting

Issue

24. Four wetlands (W3, W5, W9 and W10) and parts of two wetlands associated with the Ngarara Stream (W6, W2.1, W16, W17, and W18) totalling 16,852 m² are proposed to be reclaimed.

25. Greater Wellington considers that the proposed offsetting package is sufficient to achieve a net gain outcome to offset wetland loss, while delivering additional wetland enhancement across the site. However, Greater Wellington considers that the proposed offsetting package provided does not constitute like for like offsetting.
26. Greater Wellington notes that the proposal includes wetland reclamation, which is a prohibited activity under Provision 53 of the NES-Freshwater.

Planning framework

27. Policy 31 of the NRP sets out how the effects management hierarchy should be applied to manage adverse effects on biodiversity, aquatic ecosystem health, and mahinga kai. Policy P31 is as follows:
28. Policy P31: Adverse effects on biodiversity, aquatic ecosystem health, and mahinga kai

Adverse effects on biodiversity, aquatic ecosystem health and mahinga kai shall be managed by:

(a) in the first instance, activities that risk causing adverse effects on the values of a Schedule F ecosystem or habitat, other than activities carried out in accordance with a wetland restoration management plan, shall avoid these ecosystems and habitats. If the ecosystem or habitat cannot be avoided, the adverse effects of activities shall be managed by (b) to (g) below.

(b) avoiding adverse effects where practicable, and

(c) where adverse effects cannot be avoided, minimising them where practicable, and

(d) where adverse effects cannot be minimised, they are remedied, except as provided for in (a) to (g), and

(e) where more than minor residual adverse effects cannot be avoided, minimised, or remedied, biodiversity offsetting is provided where possible, and

(f) if biodiversity offsetting of more than minor residual adverse effects is not possible, biodiversity compensation is provided, and

(g) the activity itself is avoided if biodiversity compensation cannot be undertaken in a way that is appropriate as set out in Schedule G3, including Clause 2 of that Schedule.

[...]

A precautionary approach shall be used when assessing the potential for adverse effects on ecosystems and habitats with significant indigenous biodiversity values identified in Schedule F.

[...]

Proposals for biodiversity mitigation under (b) to (d) above, and biodiversity offsetting, and biodiversity compensation will be assessed against the principles listed in Schedule G1 (biodiversity mitigation), and Schedule G2 (biodiversity offsetting), and Schedule G3 (biodiversity compensation).

29. Policy P31 includes the terms “biodiversity offsetting” and “biodiversity compensation”, which, for the purposes of reclamation and associated offsetting, can be considered as synonymous with the aquatic offsetting and aquatic compensation referred to in the NPS-FM. Appendix 6 and 7 of the NPS-FM set out the principles for aquatic offsetting and aquatic compensation. Schedules G2 and G3 of the NRP set out the principles for biodiversity offsetting and biodiversity compensation. While Schedules G2 and G3 of the NRP are similar to the NPS-FM, Schedule G2 and G3 contain greater detail on how to determine and provide appropriate consent conditions for biodiversity offsetting and biodiversity compensation.
30. Schedule G2 of the NRP sets out the principles to be applied when proposing and considering the suitability of a biodiversity offset.

Technical expertise

31. Greater Wellington’s comments on wetland loss and offsetting are supported by comments from the following technical experts:
 - a. Melanie Dixon, Principal Ecologist, Collaborations (see Appendix 3)
 - b. James Blyth, Water Scientist and Director, Collaborations (see Appendix 5)

Analysis – Like for like off setting

32. Wetland 3 is a 1,569 m² sand dune–impounded wetland that makes up 9.3% of the proposed wetland loss. Wetland 5 is a sand dune-impounded wetland that makes up 19.7% of proposed wetland loss. While the current vegetation composition of Wetland 3 and Wetland 5 are similar to other grazed wetlands on the property (and in poor condition), they are not the same wetland type as those proposed as offset.
33. Greater Wellington consider Wetlands 3 and 5 to be a dune-impounded fen whereas the proposed ‘offset’ wetlands located on the Ngarara Floodplain will be swamp wetlands. The proposed wetland types would not offset the adverse effects of reclamation of Wetlands 3 and 5. We consider the proposed offset wetlands to be compensation for the loss of Wetlands 3 and 5.

34. Therefore, the proposed offsetting package does not provide a like for like replacement for the loss of Wetlands 3 and 5. Greater Wellington note that in line with Policy P31 of the NRP compensation should only be provided if offsetting is not possible.
35. On 04 and 05 June 2026 Greater Wellington met with the Applicant to discuss if the scope of areas of disagreement relating to ecology and hydrology could be narrowed. In this meeting it was discussed that like for like offsetting for the reclamation of Wetland 3 is a priority for Greater Wellington. Greater Wellington understands that, following this meeting, the Applicant is exploring additional offsite offsetting options, including possible wetland restoration at Queen Elizabeth II Park (where similar dune-impounded wetlands are found).
36. Greater Wellington has not discussed Wetland 5 with the Applicant. The characteristics and wetland type of Wetland 5 were identified late in the Greater Wellington's technical expert's final review.
37. In addition to this, Greater Wellington's technical advisor on hydrology, Mr Blyth, has identified that the hydrology report does not assess the hydrology of the wetlands that will be reclaimed as part of the development. Mr Blyth states it is likely the majority of these wetlands are both rainfall and groundwater fed. These rainfall and groundwater fed wetlands are proposed to be offset by wetlands that will be part of riverine systems, defined by a minimum water level maintained in Ngarara Stream, and flooded. Therefore, the hydrology of the wetland offset is not like for like as per typical biodiversity offsetting approaches.

Analysis – Wetland reclamation as a Prohibited Activity

38. Earthworks within a natural inland wetland which results, or is likely to result, in the complete or partial drainage of all or part of a natural inland wetland, is not considered under Regulations 38 to 51 of the NES-F and therefore is a prohibited activity under Provision 53.
39. The policy framework under the NRP and RPS does not anticipate that resource consent will be granted for prohibited activities. Therefore, there is no policy guidance for the application of the effects management hierarchy or determination of an appropriate offsetting package for a prohibited activity.
40. RPS Change 1 Policy 24A(e) seeks that “biodiversity offsetting or aquatic offsetting [achieves] at least a net gain, and preferably a 10% net gain or greater, in indigenous biodiversity outcomes to address residual adverse effects on indigenous biodiversity, extent, or values. This requires demonstrating, and then achieving, net gains in the type, amount, and condition of the indigenous biodiversity, extent, or values impacted. Calculating net gain requires a like-for-like quantitative loss/ gain calculation of the indigenous biodiversity values (type, amount, and condition) affected by the proposed activity”

41. The NPS-IB also seeks that biodiversity offsetting achieve a net gain in type, amount, and condition of indigenous biodiversity compared to that lost.
42. Policy P31 of the NRP sets out that proposals for biodiversity offsetting will be assessed against the principles within Schedule G2 of the NRP.

Greater Wellington suggested resolutions

43. To address the requirement for like for like offsetting of Wetland 3 and Wetland 5 the Applicant should demonstrate that it has explored options for like for like offsetting, including beyond site boundary (i.e., at Queen Elizabeth II Park). In accordance with NRP Policy P31, should only be offered (e.g., swamp wetlands as compensation for the reclamation of sand dune-impounded wetlands) when it is not possible to offset more than minor residual adverse effects.
44. To ensure that the offsetting proposed is like for like for all on-site wetlands, the Applicant should assess the hydrology of the wetland areas which will be reclaimed to determine their source (i.e., groundwater, rainwater, or riverine) and type (i.e., fen or swamp). This will determine if the proposed offsetting will be like for like offsetting as is required under the NRP and NES-F.
45. There is no specific policy guidance on how to assess the suitability of an offset package for a prohibited activity, as consent should not be granted for prohibited activities. However, Greater Wellington considers that the net gain required through RPS Change 1 Policy 24A(e) and the NPS-IB are the relevant policy direction on this matter. Further, Greater Wellington consider that the proposed offsetting package should align with all principles set out in Schedule G2 of the NRP.

Issue 2: Functional need and effects management hierarchy for stream reclamation

Issue

46. The applicant has not demonstrated that there is a functional need to reclaim part of the bed of the Ngarara Stream, or demonstrated they have applied the effects management hierarchy to the adverse effects on the bed of the Ngarara Stream.

Planning framework

47. Under Regulation 57(2) of the NES-F, a consent authority may only grant a consent to reclaim the bed of a river if the authority is satisfied that there is a functional need for the reclamation in that location, and has applied the effects management hierarchy to proposed works. Policy 7 of the NPS-FM relates to this requirement and states that the loss of river extent and values is avoided to the extent practicable.

48. Policy P31 in the NRP provides for the application of an effects management hierarchy in a similar manner to the NPS-FM. Further discussion can be found in paragraphs 24-26.
49. Policy P110 of the NRP requires that loss of extent and values the beds of rivers is avoided except where a functional need can be demonstrated, and that the reclamation is for one of the reasons set out in (b)(ii).

Analysis

50. The application seeks resource consent under Provision 57 of the NES-F for reclamation of part of the bed of the Ngarara Stream. However, the application does not consider whether there is a functional need for the reclamation of part of the bed of the Ngarara Stream.
51. The application does not clearly demonstrate how the effects management hierarchy has been applied to the effects on the Ngarara Stream.

Greater Wellington suggested resolutions

52. Greater Wellington considers that, for the application to align with Regulation 57(2) of the NES-F, the applicant is required to clearly:
 - a. Detail the functional need for the reclamation of part of the bed of the Ngarara Stream; and
 - b. Demonstrate how they have applied the effects management hierarchy to managing effects on the Ngarara Stream.

Issue 3: Classification of watercourses

Issue

53. There is disagreement between Greater Wellington and the Applicant regarding the proposed reclamation of a large portion of the approximately 3-kilometre network of watercourses/tributaries connected to the Ngarara Stream on the subject site. Greater Wellington considers that these watercourses, while highly modified, meet the definition of “river” under the RMA. However, the applicant has obtained legal and ecological advice on the classification and considers these watercourses do not meet the RMA definition of “river”.
54. Based on the Applicant’s legal and ecological advice, the application does not consider the loss of these watercourses to be reclamation, does not seek resource consent for the reclamation, and offers no specific mitigation package proposed for the loss of these watercourses (other than relocation of fauna that is living with the watercourses).

Technical expertise

55. Greater Wellington's comments on this issue are supported by comments from the following technical experts:
- a. Dr Gareth Taylor, Environmental Projects Consultant & Director (see Appendix 4)

Analysis

56. The 'Greater Wellington Regional Council, Watercourse Types Guidance Note May 2021' details that watercourses which have been constructed to drain areas that were historically wetlands or lakes are the modified form of those pre-existing waterbodies. Therefore, these types of watercourses (including those found on the subject site) are considered rivers under s13 of the RMA.
57. Greater Wellington considers that the network of watercourses linked to the Ngarara Stream were formed to drain areas of historic wetland. Therefore, based on the 'Greater Wellington Regional Council, Watercourse Types Guidance Note May 2021', it is Greater Wellington's position that these watercourses meet the RMA definition of 'river'.
58. In a mapping exercise in 2013, Greater Wellington used a digital elevation model to map highly modified rivers and streams in parts of the Wellington Region. The "highly modified watercourse" categorisation was intended only for rules in the NRP relating to the maintenance and removal of aquatic vegetation and sediment from these waterbodies (Rules R134-R136 in the NRP). However, it is relevant to this situation as it demonstrates that these water bodies are considered as 'rivers' under the RMA for the purposes of Rules R134-R136 in the NRP. Figure 1, below, shows an image taken from this mapping and identifies some (but not all) of the relevant watercourses as highly modified streams.



Figure 1 Regional Highly Modified Streams taken from Greater Wellington ArcGIS

59. Greater Wellington consider that resource consent is required under Regulation 57 of the NES-F, and Rule R142 of the NRP, for the reclamation of the bed of these rivers.
60. As detailed in Issue 2, Greater Wellington considers that the applicant needs to demonstrate that there is a functional need for the reclamation of these watercourses and to demonstrate how they have applied the effects management hierarchy to proposed reclamation.
61. Further, Greater Wellington considers that an SEV assessment should be carried out across the relevant watercourses to determine the residual effect of the proposed reclamation where the effects cannot be avoided, minimised, or remedied. This SEV would inform whether an offsetting package is required.
62. If residual adverse environmental effects associated with the reclamation of these watercourses cannot be avoided, minimised or remedied then appropriate offsetting should be provided in line with Schedule G2 of the NRP as well as RPS Change 1 Policy 24A(e). This policy seeks: "biodiversity offsetting or aquatic offsetting to achieve at least a net gain, and preferably a 10% net gain or greater, in indigenous biodiversity outcomes to address residual adverse effects on indigenous biodiversity, extent, or values. This requires demonstrating, and then achieving, net gains in the type, amount, and condition of the indigenous biodiversity, extent, or values impacted. Calculating net gain requires a like-for-like quantitative loss/ gain calculation of the indigenous biodiversity values (type, amount, and condition) affected by the proposed activity".
63. On 04 and 05 June 2026 Greater Wellington met with the Applicant to discuss if the scope of areas of disagreement relating ecology and hydrology could be narrowed. It was discussed that it

was unlikely that Greater Wellington and the Applicant would reach agreement on watercourse classification. It was agreed that it would assist the Panel if the parties focused on accurately quantifying the ecological values/impacts of the loss of these watercourses, setting aside their watercourse classification, and appropriate methods to make up loss of ecological values (if any) in the on-site restoration/offsetting package.

64. If the Panel agrees with Greater Wellington's position that resource consent is required for the reclamation of the relevant watercourses, appropriate offsetting will be required where adverse effects cannot be avoided, minimised, or remedied. This will include offsetting for the extent and value of riverbed which will be lost. In accordance with RPS Change 1 Policy 24A(e) of the RPS Change 1, this will require like for like offsetting to achieve a net gain in bed extent and value.
65. The Applicant has stated that the extent (length) of watercourse bed that would be required as part of an offsetting package could not practicably be accommodated in the site. The Applicant raised that a Stream Ecological Value-to-Wetland Ecological Value (SEV-WEV) transfer could be applied to allow the creation of additional restoration wetland to address the loss of these watercourses. Greater Wellington considers that transferring SEV to WEV, and providing additional wetland area, would not be like for like offsetting. Instead, this would be considered biodiversity compensation.
66. In line with Policy P31 of the NRP biodiversity compensation should only be employed where:
 - a. more than minor residual adverse effects cannot be avoided, minimised, or remedied, and
 - b. biodiversity offsetting of more than minor residual adverse effects is not possible, and
 - c. biodiversity compensation is undertaken in a way that is appropriate as set out in Schedule G3.
67. Greater Wellington's position is that any adverse effects that cannot be avoided, minimised, or remedied should be offset. This includes offsetting in an alternate location. Only when it is demonstrated that offsetting is not possible (including at alternate sites) should biodiversity compensation (e.g., SEV to WEV) be considered. If it is demonstrated that like for like offsetting is not possible, Greater Wellington would welcome the opportunity to engage further with the Applicant to discuss how a SEV to WEV transfer could practicably work.

Greater Wellington suggested resolutions

68. The scope of the application should be amended to seek consent for the reclamation of these watercourses.

Issue 4: Stream Ecological Value (SEVs)*Issue*

69. An SEV has been completed to define the current value of the Ngarara Stream, as well as the two largest tributaries on site. However, the applicant has not supplied a post development SEV to determine expected outcomes of restoration and offsetting in the proposed new reach. The application states that a net gain will be provided for in terms of stream area and quality of habitat, and Greater Wellington agree that this net gain can be achieved. However, an SEV calculation for the post development stream would provide a clear target for restoration.

Technical expertise

70. Greater Wellington's comments on this issue are supported by comments from the following technical experts:
- a. Dr Gareth Taylor, Environmental Projects Consultant & Director (see Appendix 4)

Analysis

71. On 04 and 05 June 2026 Greater Wellington met with the Applicant to discuss if the scope of areas of disagreement relating ecology and hydrology could be narrowed. It was agreed in these meetings (and is captured in the minutes) that "an SEV before-and-after comparison (rather than an ECR/offset) is the right way to demonstrate the realigned Ngarara Stream will be of equal or better ecological value than existing, which should help close out that issue". Greater Wellington understands that the Applicant is working on producing this post development SEV. However, as a post-development SEV has not been supplied with application documents Greater Wellington have not had a chance to review this.

Greater Wellington suggested resolutions

72. The post-development SEV calculations should be provided to the Panel and Greater Wellington for review and comment.

Issue 5: Hydrology*Issue*

73. The hydrology assessment provided with the application contains useful contextual information for the site, including ~10 months of groundwater monitoring data and several hydrogeological cross sections. However, the application is missing information that would typically be expected for a development of this scale. Without which there is uncertainty in the scale of adverse effects. Significant outstanding information includes:

- a. No transient (i.e., daily or 7-day timestep) hydrological or hydrogeological models have been developed;
 - b. Modelling does not account for local simulations of climate change;
 - c. No Ngarara Stream level monitoring was undertaken in correlation with rainfall events and inundation frequency (seasonal); and
 - d. While further groundwater level sensitivity analysis was provided (relating to peat replacement), there is remaining uncertainty in the potential effects on ground water levels and wetland hydrology.
74. Greater Wellington acknowledges that the Applicant has provided Greater Wellington with further information on groundwater following out initial assessments and feedback, and that further information may be forthcoming on this matter.

Technical expertise

75. Greater Wellington's comments on this issue are supported by comments from the following technical experts:
- a. James Blyth, Water Scientist and Director, Collaborations (see Appendix 5)

Analysis

76. While Greater Wellington considers there is still some uncertainty regarding the level of adverse effect, this is likely manageable through consent conditions requiring extensive monitoring to better understand hydrological conditions on site, including measuring baseline water levels with continuous pressure transducers (rather than monthly) at selected sites before, during, and after development. This monitoring data needs to be integrated into a sound adaptive management framework with hydrological triggers, to ensure any potential adverse effects are identified and appropriately mitigated, offset or compensated.
77. The annual variation of Ngarara Stream, and its hydrographical response to rainfall events of varying intensities, durations, etc., needs to be better understood to inform the design of riparian corridors and wetland offsetting and restoration.
78. Further detail should be provided on predicted outcomes if the streambed level in Ngarara Stream and tributaries increases over time due to increased sediment deposition and the flatter gradient established following construction of the proposed weir.

Greater Wellington suggested resolutions

79. Information should be provided to address the remaining uncertainty relating to:

- a. Developing a management approach to ensure water levels are appropriate for ecological planting plans and proposed earthworks for wetlands and riparian corridors.
- b. the possible establishment of an eco-hydrological monitoring plan.

80. Greater Wellington would welcome the opportunity to participate in further conferencing on these matters and associated conditions.

Issue 6: Stormwater discharge

Issue

81. The receiving environment for operational stormwater discharges is a wetland system. As identified above, information on site and wetland hydrology, including the design seasonally high groundwater level and hydrological requirements to support proposed ecological outcomes, has not been provided. Additionally, associated management and monitoring plans have outstanding information.

Planning Framework

82. Policy P83 sets out how the adverse effects of stormwater discharges should be managed. Policy P83 is as follows:

83. *The adverse effects of stormwater discharges shall be minimised, including by:*

- a. *using good management practice, and*
- b. *taking a source control and treatment train approach to new activities and land uses, and*
- c. *implementing water sensitive urban design in new subdivision and development, and*
- d. *progressively improving existing stormwater, wastewater, road and other public infrastructure, including during routine maintenance and upgrade, and*
- e. *managing localised adverse effects, including by addressing particular attributes appropriate to the receiving environment.*

Technical expertise

84. Greater Wellington's comments on this issue are supported by comments from the following technical experts:

- a. David Wilson, Principal Engineer & Director, The Urban Engineers (see Appendix 6).

Analysis

85. To ensure that the stormwater treatment devices provide the required level of treatment, they need to be constructed at an appropriate height above a design seasonally high groundwater level. Greater Wellington understand that the hydrology assessments provided to date are insufficient to establish a design seasonally high groundwater level.
86. Policy P83 of the NRP requires the adverse effects of stormwater discharges are minimised. Greater Wellington considers that the proposed stormwater management approach is generally consistent with parts (a), (b) and (c) of Policy P83. However, without the hydrological information identified above it is uncertain if the proposal is consistent with part (e), which requires localised adverse effects to be managed appropriate to the receiving environment. Key areas of uncertainty are including but not limited to:
 - a. Determining the balance between surface flow and subsurface flow required to maintain wetland soil moisture,
 - b. Understanding flow rates and durations needed to maintain wetland hydrology under post-development conditions, and
 - c. Understanding the response triggers that would apply if restored wetlands are not achieving the required hydrological state.
87. There is significant crossover between hydrology and stormwater management. Interactions between the stormwater management system, site hydrology, and the ecological functionality of the offset and restored wetlands will be critical for effective stormwater management. The design seasonally high groundwater level should be confirmed prior to finalisation of proposed stormwater management approach. Additionally, the outcomes that the proposed stormwater management will achieve should be determined.

Greater Wellington suggested resolutions

88. Information should be submitted to demonstrate the application is consistent with Policy 83(e), and any remaining uncertainty should be resolved prior to granting of consent and/or resolved via appropriate conditions.

Issue 7: Vesting of Stormwater Infrastructure Stormwater

Issue

89. The applicant proposes to vest on-site stormwater with a third party and has been in discussions with KCDC on this matter. However, application documents do not confirm if KCDC has provided in-principle acceptable of proposed stormwater treatment methodologies and devices.

90. Application documents state KCDC has a preference for passive non-proprietary devices, but proposed stormwater management includes the use of proprietary systems where specific locations are constrained by groundwater. Additionally, stormwater management is reliant on discharges to kerb outlets where private soakage and attenuation tanks overflow. Approval of discharge to kerb has also not been accepted.

Technical expertise

91. Greater Wellington's comments on this issue are supported by comments from the following technical experts:
- a. David Wilson, Principal Engineer and Director, The Urban Engineers (see Appendix 6).

Analysis

92. Greater Wellington's priority is that consent conditions requiring the ongoing maintenance of stormwater quality controls can be complied with for the duration of the resource consent, and that the eventual owner of assets will have the resources to manage stormwater through existing conditions. To ensure this, Greater Wellington expects that the stormwater discharge consent will eventually be transferred to KCDC when the stormwater assets are vested with KCDC.
93. Greater Wellington does not consider pre-application discussions to be formal acceptance of proposed stormwater management. The applicant proposes a 15-year staged development. An in-principle acceptance of proposed stormwater management, including proposed devices and provision of access for maintenance, should be confirmed prior to a decision being made on the approvals sought. A lack of in-principle acceptance prior to a decision on approvals sought being made may result in a stormwater management approach being consented that the eventual asset owner is not in a position to operate and maintain in accordance with the resource consent conditions.

Suggested resolution for the Panel to consider

94. It is likely that KCDC will ultimately own central stormwater devices associated with the development. To guarantee long-term success and prevent future delays, the Applicant should obtain in-principle approval from KCDC prior to a decision being made on this application. Aspects that should be considered should include, but not be limited to:
- a. Access for maintenance. It is noted that the location of devices adjacent to restored and offset wetland areas will not be available for access for maintenance. Larger devices may require access from at least two sides.
- b. Confirmation proposed proprietary devices are acceptable. The driving heads required by manufacturers, and resultant minimum depth to inverts, may be impractical for

proprietary devices currently on the market to achieve. Greater Wellington recommends independent performance verification occurs to ensure proprietary devices achieve equivalent contaminant removal to bioretention device standards through detailed design.

- c. Confirmation of the minimum depth to seasonally high groundwater level. Runoff needs to be treated prior to discharge to the receiving environment. Additionally, the distance between lined bioretention treatment devices and the seasonal high water table needs to be confirmed.
- d. Understanding that a complete Operation and Maintenance Plan should be developed prior to the vesting of any public stormwater infrastructure with KCDC.

Issue 8: Erosion and sediment control

Issue

- 95. The application proposes approximately 1.2 million cubic metres of cut and 1.1 million cubic metres of fill over an area of 93ha. Robust consent conditions need to be applied to ensure that the effects of erosion and sediment are suitably managed.

Technical expertise

- 96. Greater Wellington's comments on this issue are supported by comments from the following technical experts:
 - a. Gregor McLean, Director/ Environmental Consultant, Southern Skies Environmental (see Appendix 7)

Analysis

- 97. The Draft Construction and Environmental Management Plan (DCEMP) and Erosion and Sediment Control Plan (ESCP) seek to provide the overarching principles for the management of earthworks, dust, dewatering and streamworks.
- 98. Although the plans do not provide the level of detail required to demonstrate that effects will be suitably managed, Greater Wellington considers that there is no apparent reason why erosion and sediment controls could not be designed, installed and maintained in accordance with the "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region".
- 99. Greater Wellington considers that the effects of discharges of erosion and sediment can be managed through appropriate consent conditions.

Greater Wellington suggested resolutions

100. Conditions of consent should be applied to ensure that:
- a. the management plan structure is clear and that the purpose of the plans is defined. The consent conditions should also ensure that the information required in each of the plans is specified.
 - b. Stage Specific Erosion and Sediment Control Plans (SSESCP's) be prepared in accordance with Greater Wellington Regional Council's "Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region" and be submitted to council for certification prior to earthworks commencing. The condition should also list the information which needs to be included in the SSESCP's.
 - c. the progressive stabilisation of the site and to ensure that the stabilisation techniques implemented are suitable for the soil types, time of year and climatic conditions.

Issue 9: Flooding Effects*Issue*

101. Egress from several properties is shown to be affected during smaller, more frequent flood events, as well as during the 1% AEP event.
102. The double-barrel culvert at the downstream end of the Lower Ngarara Wetland Cluster requires further consideration through detailed design.
103. Some details regarding climate scenarios, sensitivity, and flood protection maintenance requirements have not been provided.

Technical expertise

104. Greater Wellington's comments on this issue are supported by comments from the following technical experts:
- a. Kirsty Duff, Senior Engineer, Flood Advisory, Greater Wellington (see Appendix 8)

Analysis

105. Several roads are expected to be significantly inundated during moderate to severe flood events, restricting access and egress. Flood depths greater than 0.5 m may prevent emergency vehicles from reaching parts of the development. Greater Wellington consider further assessment is required to understand the implications of this flooding for movement within the completed

development, including whether people would be able to safely walk or drive through inundated areas,

106. The double-barrel culvert at the downstream end of the Lower Ngarara Wetland Cluster requires further consideration through detailed design. The culvert has been modelled with a 50% blockage, assumed to represent sediment build-up. This blockage scenario, including the potential for both sediment and debris accumulation, should be tested during detailed design to confirm that the culvert can operate as intended and that no adverse flood effects would result.
107. It is unclear which climate scenarios have been used in AWA's modelling. AWA's projections extend to a 2130 horizon, whereas Landlink's stormwater assessment only extends to 2090. It is also unclear which emissions pathway/scenario AWA has adopted.
108. Sensitivity testing should be undertaken for key flooding scenarios and model parameters, including blockage of culverts and outlets from both debris and sedimentation, changes in hydraulic roughness, and elevated groundwater levels coinciding with rainfall events.
109. Significant flood protection infrastructure is proposed, however details of the maintenance requirements (including design life) and how maintenance will be carried out (for example, where sediment and debris can be removed) is not provided.

Greater Wellington suggested resolutions

110. The applicant should provide flood hazard mapping using the Australian Rainfall and Runoff H1–H6 hazard classifications. This mapping would help inform emergency management planning and decisions.
111. The applicant should provide comment on duration of road inundation.
112. Conditions should require that the modelled blockage scenario for the twin barrel culvert be tested during detailed design to confirm that the culvert can operate as intended
113. Conditions should be applied to ensure that the detailed design for flood protection infrastructure includes maintenance requirements (including design life) and how maintenance will be carried out (for example, where sediment and debris can be removed).
114. Details of the climate scenarios, sensitivity analysis and emission pathways used in flood modelling should be provided.

Issue 10: Regional and Public Transport

Issue

115. Greater Wellington's full comments on regional and public transport are provided in Appendix 9.

116. In summary the key regional and public transport issues are;

- a. The site is not served by existing amenities or bus services and is well beyond what would be considered a walkable catchment for existing low frequency bus routes which serve Peka Peka.
- b. The development is likely to generate substantial additional traffic volumes on local roads, and will cause an increased pressure on park and ride capacity at Waikanae Station.

Greater Wellington suggested resolutions

117. Greater Wellington considers that there should be further discussion between the Applicant and Greater Wellington to address:

- a. Impacts on park and ride facilities at Waikanae;
- b. Effects on the existing public transport services within the area;
- c. Creation of an expectation that the development may be serviced by a bus service, in the absence of adequate infrastructure or funding for a new service.

Other matters

On-going protection for ecological offset sites

118. Greater Wellington's priority is that areas identified as ecological offsets are protected for that purpose in perpetuity. Policy P31 of the NRP sets out that proposals for biodiversity offsetting will be assessed against the principles in schedule G2. Greater Wellington (in line with schedule G2 of the NRP) seek that it is demonstrated that management arrangements, legal arrangements (e.g. covenants) and financial arrangements (e.g. bonds) are in place that allow the positive effects to endure as long as the residual adverse effects of the activity, and preferably in perpetuity.

Te Harakeke Swamp

119. Greater Wellington's priority for Te Harakeke wetland within the site of the proposed development is that the ecological and hydrological characteristics of the wetland are protected in perpetuity.

120. Greater Wellington consider that vesting Te Harakeke Wetland (Lots 5310, 5311 and 5314) to KCDC as Local Purpose (Ecological) Reserve will achieve this priority and ensure Te Harakeke Wetland's on-going management and perpetual protection. This will also ensure that the development has an appropriate level of publicly accessible open space provided for as a certainty both now and in the future.

Proposed consent conditions

121. On 18 June 2026 Greater Wellington provided the Applicant with the following feedback on the set of proposed conditions provided with the application as Appendix 33.
- a. *With conditions relating to wetland restoration and stream restoration, I have deferred to Collaborations comments (attached) on conditions. However, we would still appreciate the opportunity to provide feedback on these conditions at a future date once you've had time to consider these comments.*
 - b. *For other consents with extensive condition suites (including other fast tracks), we have used a table on the front page to identify the specific consents (e.g., wetland reclamation, earthworks) conditions relate to. Given the number of conditions associated with this consent, we would recommend this is included in the next condition iteration.*
 - c. *Have mana whenua provided any feedback on the Timatanga ceremony, Kaitiaki Monitoring Strategy, or other conditions that require their input?*
 - d. *We suggest introducing conditions that place an upper limit on allowable wetland and stream reclamation. We've run into significant compliance issues with other wetland consents missing this condition. I understand that as detailed design processes there can be changes in total area, but unders/overs ideally cancel each other out.*
 - e. *We can't place conditions on third parties (e.g., KCDC). Once consents have been transferred, all conditions will become the responsibility of the new consent holder. Clearly splitting up conditions and consents (see comment 2) may help here and also provide clear information regarding responsibilities arising from ownership/maintenance of assets.*
122. The feedback included also included the following documents which are attached as appendix 1 and Appendix 2 of these comments:
- a. Appendix 1 - A tracked changes version of Appendix 33 (of the application) showing Greater Wellington's proposed changes to the proposed condition set, and
 - b. Appendix 2 - Written comments from Melanie Dixon, Principal Ecologist, Collaborations, James Blyth, Water Scientist and Director, Collaborations, & Dr Gareth Taylor, Environmental Projects Consultant & Director on the draft proposed conditions.
123. Greater Wellington have not received a response to the feedback provided on 18 June 2026.

124. Greater Wellington acknowledges that the draft conditions set out in Appendix 1 may need to be amended depending on the Panel's findings on the substantive issues identified by Greater Wellington and other parties.

Appendix 1: Greater Wellington draft regional resource consent conditions

Appendix 2: Waikanae North Development (FTA106). Wetland and Stream Condition Recommendations. From: Melanie Dixon, Principal Ecologist & James Blyth, Director and Water Scientist, & Dr Gareth Taylor, Director and Aquatic Ecologist

Appendix 3: Technical comments – Wetland Ecology**Appendix 4: Technical comments – Stream ecology****Appendix 5: Technical comments – Hydrology****Appendix 6: Technical comments – Stormwater****Appendix 7: Technical comments – Erosion and Sediment Control****Appendix 8: Technical comments – Flooding Effects****Appendix 9: Organisation comments – Public and Regional Transportation**

Appendix 10: Author's Statements of experience

Joshua Knowles:

My name is Joshua Knowles, I am a Senior Resource Advisor employed by Greater Wellington Regional Council. I hold a Bachelor of Resource and Environmental Planning (Honours) from Massey University.

My previous experience includes Policy Assistant at Horizons Regional Council, and Development Management Planner at the London Borough of Lewisham Council. I have held Resource Advisor roles that include the processing of resource consents for Greater Wellington since October 2020.

Katherine Greenaway:

My name is Katherine Anne Bean Greenaway. I am a Resource Advisor employed by Greater Wellington Regional Council. I hold a Bachelor of Science (Physical Geography, minoring in Environmental Studies) and Master of Science (Physical Geography) (First Class Honours) from Te Herenga Waka Victoria University.

I have been a Resource Advisor, Major Projects Team, for Greater Wellington since April 2024.