Appendix 5: Assessment of RMA planning document objectives and policies

Contents

Appendix 5: Assessment of RMA planning document objectives and policies 1

National Policy Statement for Urban Development 3

New Zealand Coastal Policy Statement 8

National Policy Statement for Natural Hazards 14

National Policy Statement for Freshwater Management 24

National Policy Statement for Indigenous Biodiversity 27

Regional Policy Statement 29

Chapter 3.1A - Climate Change 29

Chapter 3.4 – Fresh water 30

Chapter 3.8 – Natural Hazards 34

Chapter 3.9 - Regional form, design and function 36

Chapter 3.10 - Resource management with tangata whenua 40

Natural Resources Plan 42

3.1 Ki Uta Ki Tai and Integrated Catchment Management 42

3.2 Beneficial use and development 43

3.3 Māori relationships 45

3.4 Natural character, form and function 47

3.5 Natural hazards 47

3.6 Water quality 49

3.7 Biodiversity, aquatic ecosystem health and mahinga kai 49

3.8 Sites with significant values 53

3.10 3.11 Land use 54

3.12 Discharges to land and water 54

Kāpiti Coast District Plan 58

Strategic Direction 58

Ratanui Development Area 65

General Residential Zone 68

Transport 75

Contaminated Land 78

Natural Hazards 80

Coastal Environment 81
Earthworks 83
Financial contributions 84
Noise 85
Signs 87

National Policy Statement for Urban Development

Objective 1: ***New Zealand has 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: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

(a) have or enable a variety of homes that:

(i) meet the needs, in terms of type, price, and location, of different households; and

(ii) enable Māori to express their cultural traditions and norms; and

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and

(f) are resilient to the likely current and future effects of climate change.

Assessment: The Proposal contributes to the criteria listed in Policy 1 for well-functioning urban environments as:

- Clause (a) – As detailed in the Economic Assessment (**Appendix 15**), the Proposal will contribute to meeting the District's housing demand as it will provide for an increase in housing supply, including in the aged-care housing typology that is in demand. This will cater for Kāpiti's ageing population while freeing up existing residential housing stock for others in the market reducing land demand pressure. There has been a significant increase in demand for retirement housing in the Kāpiti Coast as elderly people gravitate towards the area due to proximity to the coast and slower lifestyle. The proposal would enhance the variety of living options, price points, and overall growth potential within Kāpiti Coast's senior residential market, contributing positively to the creation of a 'well-functioning' urban environment. The proximity of the Site abutting existing urban development also assists the proposal with being an appropriate use of the land. The retirement village will include on-site hospital and rest home level care which will reduce pressure on the existing healthcare network in Kāpiti where there is no hospital and current medical centres are at capacity.
- Clause (b) – The Proposal is predominantly for residential and aged-care development and does not provide sites for different business sectors, however the proposed development includes provision of housing, healthcare, recreation and other facilities within the site which will serve the daily convenience needs of residents;

- Clause (c) – The proposed development will provide housing, healthcare, recreation and other facilities within the site which will serve the daily convenience needs of residents, reducing reliance on private vehicles. The site is well-located for multi-modal transport outside the development, including being in close proximity to the Paraparaumu Metropolitan Centre and its associated facilities and amenities.

- Clause (d) – The Proposal supports competitive land markets as it enables housing in a location where there is high demand and constrained supply as outlined in the Economic Assessment provided in **Appendix 15.**

- Clause (e) – Greenhouse gas emissions from vehicle travel are addressed through the provision of multi-modal transport options, while removing stock from the Site will reduce methane emissions. The Site is well located in relation to commercial and community services, natural and open spaces, and active transport routes, including through its proximity to the Paraparaumu Metropolitan Centre and its associated facilities and amenities. The design and layout of the development will encourage low-emission transport modes, including walking and cycling, as alternatives to private vehicle use. In addition, the provision of housing, healthcare, recreation, and other facilities on site will meet residents' daily needs and further reduce reliance on private vehicles.

- Clause (f) – The future impacts of climate change have been considered through design of the stormwater management system, including the use of nature-based solutions such as centralised wetlands. These systems are designed to future proof the development against the predicted impacts of climate change such as increased rainfall intensity.

For these reasons, the Proposal is consistent with Objective 1 and Policy 1 as it contributes to a well-functioning urban environment which will provide for the social and economic wellbeing, and health and safety of the occupants.

Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

Assessment: The proposal will support the competitive operation of the Site and the development market generally by providing for additional residentially zoned land, in turn supporting housing affordability as provided for by Objective 2. This will cater for Kāpiti's ageing population while freeing up existing residential housing stock for others in the market reducing land demand pressure.

Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

(c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)

(d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity

(f) the likely current and future effects of climate change.

Assessment: As detailed in the Economic Assessment (**Appendix 15**), the Proposal will contribute to meeting the District's housing demand as it will provide for an increase in housing supply, providing an increase in the aged-care housing typology that is in demand. The design and location of the site will contribute to a well-functioning urban environment as outlined above.

In relation to amenity values, the objective acknowledges that urban environments are dynamic and that amenity is not static but evolves in response to demographic, cultural, and environmental changes. The transition of the site from rural to urban use will result in a change in character, but this change is anticipated and supported by the planning framework, including the Ratanui Development Area in the ODP.

The Proposal incorporates features that align with Objective 4 and Policy 6 including:

- Provision of outdoor areas that are accessible and integrated into the development, supporting recreation, community interaction, and ecological enhancement.
- Onsite facilities that will serve daily convenience needs, reducing reliance on private vehicles and contributing to a vibrant local character.
- Multi-modal transport connectivity, including pedestrian and cycle paths, which supports accessibility and contributes to the amenity of the area. It will enable people to live in close proximity to the Paraparaumu Metropolitan Centre and its associated facilities and amenities.
- Landscape and ecological restoration, including riparian planting and wetland enhancement, which will improve the visual and environmental quality of the area over time.
- Design flexibility that allows for a variety of retirement unit typologies, enabling the built form to respond to changing community needs and preferences.
- As outlined in the Civil Infrastructure Report, the future impacts of climate change have been considered, and the site is able to address natural hazard risks such as flooding including the predicted impacts of climate change such as increased rainfall intensity through nature-based solutions such as constructed wetlands.

These elements demonstrate that the Proposal not only maintains but actively contributes to the development of amenity values in a way that aligns with the evolving nature of urban environments. The Proposal is therefore consistent with Objective 4 and Policy 6, including the requirement to have regard to the benefits of urban development, the provision of development capacity, and the effects of climate change.

Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

(a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and

(b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and

(c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and

(d) operate in a way that is consistent with iwi participation legislation.

Assessment: In designing the development and preparing this Substantive Application, the Applicant has engaged with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

Objective 6: Local authority decisions on urban development that affect urban environments are:

(a) integrated with infrastructure planning and funding decisions; and

(b) strategic over the medium term and long term; and

(c) responsive, particularly in relation to proposals that would supply significant development capacity.

Assessment: The Proposal takes an integrated approach with regard to the provision of new infrastructure on site and connecting with existing infrastructure off site.

Objective 8: New Zealand's urban environments:

(a) support reductions in greenhouse gas emissions; and

(b) are resilient to the current and future effects of climate change.

Assessment: The Proposal supports reductions in greenhouse gas emissions through enabling a well-functioning urban environment and multi-modal transport connectivity. Future residents will have multi-modal transport options including pedestrian and cycle connections to nearby amenities such

as open space and commercial and community facilities. In addition, the provision of housing, healthcare, recreation, and other facilities on site will meet residents' daily needs and further reduce reliance on private vehicles. Further, the removal of stock from the site will have benefits in terms of reduced methane emissions. As such, the Proposal is consistent with this objective and policy.

The Proposal is resilient to the current and future effects of climate change in that it takes a 100 year plus climate change approach to addressing stormwater management and flooding.

New Zealand Coastal Policy Statement

Objective 1

To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by:

- *maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature;*
- *protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and*
- *maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity.*

Objective 2

To preserve the natural character of the coastal environment and protect natural features and landscape values through:

- *recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution;*
- *identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and*
- *encouraging restoration of the coastal environment*

Objective 3

To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by:

- *recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources;*
- *promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act;*
- *incorporating mātauranga Māori into sustainable management practices; and*
- *recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.*

Objective 6

To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that:

- *the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits;*

- *some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities;*
- *functionally some uses and developments can only be located on the coast or in the coastal marine area;*
- *the coastal environment contains renewable energy resources of significant value;*
- *the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities;*
- *the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land;*
- *the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and*
- *historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.*

Policy 6 Activities in the coastal environment

(1) In relation to the coastal environment:

(a) recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities which may be required for the social, economic and cultural well-being of people and communities; (b) consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment;

(c) encourage the consolidation of existing coastal settlements and urban areas where this will contribute to the avoidance or mitigation of sprawling or sporadic patterns of settlement and urban growth;

(d) recognise tangata whenua needs for papakāinga3, marae and associated developments and make appropriate provision for them;

(e) consider where and how built development on land should be controlled so that it does not compromise activities of national or regional importance that have a functional need to locate and operate in the coastal marine area;

(f) consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable;

(g) recognise the potential of renewable resources in the coastal environment, such as energy from wind, waves, currents and tides, to meet the reasonably foreseeable needs of current and future generations;

(h) consider how adverse visual impacts of development can be avoided in areas sensitive to such effects, such as headlands and prominent ridgelines, and as far as practicable and reasonable apply controls or conditions to avoid those effects; (i) set

back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment; and

(j) where appropriate, buffer areas and sites of significant indigenous biological diversity, or historic heritage value.

(2) Additionally, in relation to the coastal marine area:

(a) recognise potential contributions to the social, economic and cultural wellbeing of people and communities from use and development of the coastal marine area, including the potential for renewable marine energy to contribute to meeting the energy needs of current and future generations;

(b) recognise the need to maintain and enhance the public open space and recreation qualities and values of the coastal marine area;

(c) recognise that there are activities that have a functional need to be located in the coastal marine area, and provide for those activities in appropriate places;

(d) recognise that activities that do not have a functional need for location in the coastal marine area generally should not be located there; and

(e) promote the efficient use of occupied space, including by:

(i) requiring that structures be made available for public or multiple use wherever reasonable and practicable;

(ii) requiring the removal of any abandoned or redundant structure that has no heritage, amenity or reuse value; and

(iii) considering whether consent conditions should be applied to ensure that space occupied for an activity is used for that purpose effectively and without unreasonable delay.

(3) Where an activity is infrastructure, including renewable electricity generation or electricity transmission, an aquaculture activity, or extraction of minerals for the purpose of supporting infrastructure, (6)(1)(e), (2)(c) and (2)(d) above must be read to apply if the activity has a functional need or operational need to locate in the coastal marine area.

(4) In this policy, 'operational need' and 'functional need' have the meanings set out in the National Planning Standards issued under section 58E of the Act.

Policy 13 – Preservation of Natural Character

(1) To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development:

(a) avoid adverse effects of activities on natural character in areas of the coastal environment with outstanding natural character; and

(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by:

(c) assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and

(d) ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions.

(2) Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as:

(a) natural elements, processes and patterns;

(b) biophysical, ecological, geological and geomorphological aspects;

(c) natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks;

(d) the natural movement of water and sediment;

(e) the natural darkness of the night sky;

(f) places or areas that are wild or scenic;

(g) a range of natural character from pristine to modified; and

(h) experiential attributes, including the sounds and smell of the sea; and their context or setting.

Policy 11 Indigenous biological diversity (biodiversity)

To protect indigenous biological diversity in the coastal environment:

(a) avoid adverse effects of activities on:

(i) indigenous taxa4 that are listed as threatened5 or at risk in the New Zealand Threat Classification System lists;

(ii) taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened;

(iii) indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare;

(iv) habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare;

(v) areas containing nationally significant examples of indigenous community types; and

(vi) areas set aside for full or partial protection of indigenous biological diversity under other legislation; and

(b) avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on:

(i) areas of predominantly indigenous vegetation in the coastal environment;

(ii) habitats in the coastal environment that are important during the vulnerable life stages of indigenous species;

(iii) indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh;

(iv) habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes;

(v) habitats, including areas and routes, important to migratory species; and

(vi) ecological corridors, and areas important for linking or maintaining biological values identified under this policy.

Policy 14 – Restoration of Natural Character

Promote restoration or rehabilitation of the natural character of the coastal environment, including by:

(a) identifying areas and opportunities for restoration or rehabilitation;

(b) providing policies, rules and other methods directed at restoration or rehabilitation in regional policy statements, and plans;

(c) where practicable, imposing or reviewing restoration or rehabilitation conditions on resource consents and designations, including for the continuation of activities; and recognising that where degraded areas of the coastal environment require restoration or rehabilitation, possible approaches include:

(i) restoring indigenous habitats and ecosystems, using local genetic stock where practicable; or

(ii) encouraging natural regeneration of indigenous species, recognising the need for effective weed and animal pest management; or

(iii) creating or enhancing habitat for indigenous species; or

(iv) rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarsh; or

(v) restoring and protecting riparian and intertidal margins; or

(vi) reducing or eliminating discharges of contaminants; or

(vii) removing redundant structures and materials that have been assessed to have minimal heritage or amenity values and when the removal is authorised by required permits, including an archaeological authority under the Historic Places Act 1993; or

(viii) restoring cultural landscape features; or

(ix) redesign of structures that interfere with ecosystem processes; or

(x) decommissioning or restoring historic landfill and other contaminated sites which are, or have the potential to, leach material into the coastal marine area.

Policy 15 – Natural Features and Natural Landscapes

To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:

(a) avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and

(b) avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; including by:

(c) identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to:

(i) natural science factors, including geological, topographical, ecological and dynamic components;

(ii) the presence of water including in seas, lakes, rivers and streams;

(iii) legibility or expressiveness—how obviously the feature or landscape demonstrates its formative processes;

(iv) aesthetic values including memorability and naturalness; (v) vegetation (native and exotic);

(vi) transient values, including presence of wildlife or other values at certain times of the day or year;

(vii) whether the values are shared and recognised;

(viii) cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features;

(ix) historical and heritage associations; and

(x) wild or scenic values;

(d) ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and

(e) including the objectives, policies and rules required by (d) in plans.

Assessment: The New Zealand Coastal Policy Statement (NZCPS) guides local authorities in their day to day management of the coastal environment.

The site is within the Coastal Environment overlay of the District Plan which extends from mean high water springs to a line roughly equating to the alignment of Old State Highway 1. The Coastal Environment overlay therefore covers the majority of the urban areas within the District.

Given the location of the site within the Coastal Environment overlay and as the site contains remnant sand dunes, it is relevant to consider the proposal against the NZCPS. However, as the site is well

removed from the actual coastline and is located within an urban zone, the NZCPS is not considered overly determinative on the use of the area for urban development.

Further, the site does not contain any protected features such as outstanding natural features and landscapes, special amenity landscapes, areas of significant indigenous vegetation or significant habitats of indigenous fauna. It is highly modified by historical grazing, drainage works, vegetation clearance and earthworks and exhibits a relatively low level of natural character.

On the basis of the above, it is considered that the proposal aligns with the direction of Policy 11 and Policy 14 through the naturalisation of the highly modified stream on site, and the creation of a new centralised wetlands, which will improve biodiversity outcomes. The newly naturalised and rehabilitated area will create and enhance habitat of indigenous species and will contribute towards an ecological link to the coast.

While the Proposal will alter the existing pastoral character of the Site, it retains key landform elements, including the northern dune, and incorporates a comprehensive landscape framework that integrates development with the surrounding environment. The proposed landscape framework will substantially increase vegetation cover and improve ecological and landscape values compared with the existing pastoral environment.

The proposal is not considered to represent an inappropriate form of development given its location within an established urban area and the absence of protected features within either the site or the immediate vicinity. It is therefore considered to be consistent with Policy 6 *Activities in the coastal environment* which provides for the provision of infrastructure, built development to accommodate population growth and the consolidation of urban areas.

National Policy Statement for Natural Hazards

2.1 Objective

(1) Natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach.

2.2 Policies

Policy 1: When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.

Policy 2: Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.

Policy 3: Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.

Policy 4: Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.

Policy 5: Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.

Policy 6: The potential impacts of climate change to at least 100 years into the future must be considered.

Assessment: The policies of the NPS-NH are assessed below with regard to the natural hazards identified as being present on site:

NPS-NH policies	Flood hazards	Geohazards
Policy 1: When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	These hazards are assessed in the Flood Risk Assessment (**Appendix 19**) with flood hazard risk assessed as being **low**.	These hazards are assessed in the Geotechnical Assessment (**Appendix 21**) with hazards in descending levels of risk: • Liquefaction – high • Active faults – Medium • Tsunami – Medium • Consolidation Settlement – low • Landslide – low • Erosion - low
Policy 2: Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The management approach for stormwater is outlined in section 15.15.2 of the Substantive Application. The management approach is proportionate to the level of natural hazard risk, and with appropriate mitigation measures, the proposal will have less than minor flood hazard effects.	The management approach for geohazards is outlined in Section 15.15.1 of the Substantive Application. The management approach is proportionate to the level of natural hazard risk, and with appropriate mitigation measures, the proposal is considered to pose a less than minor geohazard risk on people and property.
Policy 3: Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	Not applicable, no very high natural hazard risk has been identified.	Not applicable, no very high natural hazard risk has been identified.
Policy 4: Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk	The development has been designed to not create or increase significant natural hazard risk on other sites. The development has been designed to be hydraulically neutral, it will therefore not create or increase	The development has been designed to not create or increase significant natural geohazard risk on other sites. The geotechnical design approach proposed prevents transferring slope instability risks

must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	significant natural hazard risk on other sites.	to neighbouring properties. Staged earthworks and erosion/sediment controls minimise sediment movement that could destabilise other properties.
Policy 5: Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	The Flood Risk Assessment assesses these risks using the best available information. Detailed hydrological modelling has been undertaken using contemporary rainfall datasets and climate change parameters.	The Geotechnical Investigation (**Appendix 21**) assesses these risks using the best available information. Comprehensive geotechnical site investigations, including boreholes, test pits, slope assessment and liquefaction screening. Acknowledgement of uncertainty (e.g., groundwater variability, seismic triggers) is built into design factors of safety.
Policy 6: The potential impacts of climate change to at least 100 years into the future must be considered.	Modelling outlined in the Flood Risk Assessment (**Appendix 19**), this incorporates climate change allowances such as increased rainfall intensity anticipated 100 years into the future.	Slope stability assessments in the Geotechnical Investigation (**Appendix 21**) consider rainfall induced saturation effects expected to increase with climate change.

Overall, the proposal is consistent with the NPS-NH objective, which requires natural hazard risk to people and property to be managed using a risk-based, proportionate approach. The development is deliberately located outside the highest risk areas on the site for flooding, slope instability and liquefaction, and it relies on detailed hydrological and geotechnical assessments to understand hazard likelihood and consequences across the site. These investigations reflect the structured risk identification approach anticipated by the NPS-NH and ensure that subdivision and land use decisions are grounded in robust, site specific hazard evidence.

Natural hazard likelihood and consequence have been assessed in accordance with the NPS-NH risk matrix (Policy 1) and applies management responses that scale proportionately with risk (Policy 2).

Residential development in areas assessed as presenting potentially very high risk—such as steep, instability prone slopes—is fully avoided (Policy 3), and the project's stormwater and earthworks design ensures it does not create or exacerbate hazard risks for neighbouring properties (Policy 4).

Measures such as hydraulic neutrality, erosion control, engineered platforms and drainage systems all contribute to meeting these requirements.

The project is consistent with Policies 5 and 6, as it is based on the best available information, with uncertainties acknowledged and addressed through conservative engineering, staged certification, and adaptive management. Long-term climate change effects over a 100-year horizon are fully integrated into the stormwater, flooding and slope stability assessments. This includes the use of climate-adjusted rainfall intensities, resilience-focused WSUD design, and geotechnical analysis that anticipates increased rainfall and soil saturation.

Overall, the proposal incorporates natural hazard management that aligns strongly with the expectations of the NPS-NH.

National Policy Statement for Infrastructure

2.1 Objective

(1) The objective of this National Policy Statement is to:

(a) ensure the national, regional and local benefits of infrastructure are provided for;

(b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;

(c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;

(d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and

(e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.

2.2 Policies

Policy 1: Providing for the Benefits of Infrastructure

(1) Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for.

(2) Decision-makers must recognise that the benefits of infrastructure include:

(a) providing for the social, cultural and economic wellbeing of present and future generations;

(b) creating, supporting and enhancing well-functioning urban and rural environments;

(c) supporting sufficient development capacity to meet demand for housing and business land;

(d) *providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;*

(e) *helping to protect and restore the natural environment;*

(f) *supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and*

(g) *reducing the risks from, and improving resilience to, natural hazards and climate change.*

(3) Decision-makers must recognise:

(a) *the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and*

(b) *that infrastructure networks can be both independent and interconnected.*

Policy 2: Operational Need or Functional Need of Infrastructure to be in Particular Locations and Environments

(1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments.

(2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to:

(a) *provide services to people and communities in a timely, effective and efficient manner;*

(b) *operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries;*

(c) *access or connect to particular natural or physical resources, including other infrastructure;*

(d) *be accessible so infrastructure activities can be undertaken effectively and efficiently;*

(e) *locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and*

(f) *manage risks from natural hazards.*

Policy 3: Considering Spatial Planning

(1) Decision-makers must:

(a) have regard to the extent to which the infrastructure has been identified within a strategic planning document, while recognising that not all infrastructure can be spatially identified in advance; and

(b) consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker.

Policy 4: Enabling the Efficient and Timely Operation and Delivery of Infrastructure Activities

(1) Decision-makers must:

(a) enable the efficient and timely delivery of infrastructure activities;

(b) enable cross-boundary infrastructure networks;

(c) provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes;

(d) enable opportunities to make more effective use of existing infrastructure;

(e) consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and

(f) enable the upgrading of infrastructure where this will:

(i) improve the resilience of infrastructure to the risks from natural hazards and effects of climate change;

(ii) maintain or improve its level of infrastructure service, including to meet increasing demand; or

(iii) improve environmental outcomes.

(2) Decision-makers must:

(a) recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and

(b) have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.

Policy 5: Recognising and Providing for Infrastructure Supporting Activities

(1) Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by:

(a) *recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised;*

(b) *recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and*

(c) *enabling the timely delivery of infrastructure supporting activities.*

Policy 6: Recognising and Providing for Māori Interests

(1) Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by:

(a) *taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change;*

(b) *recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and*

(c) *local authorities:*

(i) *providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and*

(ii) *operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.*

Policy 7: Assessing and Managing the Effects of Proposed Infrastructure Activities

(1) When assessing and managing the effects of infrastructure activities, decision-makers must:

(a) *have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work;*

(b) *consider the technical and operational requirements and constraints of infrastructure activities;*

(c) *take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;*

(d) *take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and*

(e) *ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.*

Policy 8: Operation, Maintenance and Minor Upgrade of Existing Infrastructure

(1) Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.

Policy 9: Managing the Effects of New Infrastructure and Major Upgrades

(1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments.

(2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans.

(3) Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.

Policy 10: Planning for and Managing the Interface and Compatibility of Infrastructure With Other Activities

(1) Decision-makers on planning instruments must manage the interface between existing and planned infrastructure and other activities to ensure:

(a) *infrastructure and other activities are as compatible as practicable;*

(b) *the safe, efficient and effective operation, maintenance and minor upgrades, and major upgrades of existing or planned infrastructure are not compromised by the adverse effects of other activities; and*

(c) *infrastructure activities that are compatible with each other are co-located, while recognising that some types of infrastructure are not compatible.*

(2) Decision-makers on planning instruments must:

(a) *engage with infrastructure providers to:*

(i) *understand their existing and planned infrastructure activities and medium to long-term plans;*

(ii) *identify appropriate buffers and other methods to protect existing and planned infrastructure from the adverse effects of new or intensified sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety;*

(iii) support the strategic integration of infrastructure with land use activities;

(b) identify:

(i) activities that are particularly sensitive to the effects of infrastructure;

(ii) activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures;

(iii) infrastructure activities that are sensitive to the effects of other infrastructure;

(c) apply a range of methods, including, where appropriate:

(i) the use of buffers in plans to manage sensitive activities, including new or intensified sensitive activities, and incompatible activities near infrastructure;

(ii) design standards to manage the effects of infrastructure on other activities;

(iii) special purpose zoning and other spatial-planning layers; and

(d) ensure that measures to avoid, remedy or mitigate the effects of other activities on infrastructure are consistent with relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies.

Policy 11: Assessing and Managing the Interface Between Infrastructure and Other Activities

(1) When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, through planning instruments, decision-makers must:

(a) recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided;

(b) recognise that:

(i) amenity values change due to a range of factors;

(ii) changes in amenity values from infrastructure activities can be necessary to achieve well-functioning urban and rural environments; and

(c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing flexibility for site- and project-specific circumstances.

Assessment: The above policies are addressed in turn:

- Policy 1 – The proposal seeks to provide for new connections to regionally significant infrastructure including water supply, wastewater, stormwater and power infrastructure. This will provide regional and local benefits by supporting the delivery of housing capacity for the Kāpiti District and the creation of a well-functioning urban environment. With regard to Policy 1 (3), there are no significant risks or impacts identified.

- Policy 2 – The design process has considered alternatives to the proposed locations, effects have been avoided where possible, and where not, there is an operational need for the infrastructure to be located where proposed because it needs to service the housing provided as part of the project. There are no other practicable options for the proposed location for site access, roading corridor upgrades and connections to three waters and utilities networks.

- Policy 3 – The proposal implements Ratanui Development Area Structure Plan and is located within the General Residential zoning that anticipates urban development and infrastructure. The project also aligns with recent district and regional growth strategies cited in Section 3.2.1 of the Substantive Application.

- Policy 4 – The proposal seeks to enable the efficient and timely delivery of infrastructure activities, existing infrastructure capacity will be used where available, and where there are capacity constraints there will be improvements to enable capacity, such as the upgrading of the roading corridor.

- Policy 5 – The project explicitly provides for supporting works: large-scale earthworks, construction access, culvert upgrades/removals, sediment control systems, and ecological planting associated with the three waters and transport works. These supporting works are essential to enable the benefits of the infrastructure (outlined in the assessment against Policy 1) to be realised.

- Policy 6 - Ongoing involvement of Ātiawa ki Whakarongotai in monitoring/restoration, site inductions and tikanga, and input into management plans and conditions, will operationalise Māori involvement during delivery.

- Policy 7 - A detailed effects assessment is contained in the Substantive Application, the matters in (a) to (e) were considered as part of this assessment. Overall, potential adverse effects have been assessed as no more than minor with regard to effects of infrastructure activities.

- Policy 8 - The proposal interfaces with and upgrades existing wastewater trunk sections in the Ratanui Road corridor, replaces/upsizes culverts, and improves fish passage—all within existing corridors. This is consistent with the policy's intent to enable maintenance/minor upgrades for network performance and resilience. A detailed effects assessment is contained in the Substantive Application, potential adverse effects have been assessed as less than minor with regard to effects of infrastructure activities.

- Policy 9 - Infrastructure upgrades include roading corridor upgrades. Overall, potential adverse effects have been assessed as no more than minor. Impacts on section 6 matters are

outlined in Section 12.2 of the Substantive Application. The proposal is generally consistent with Section 6.

- Policy 10 – The interface between various activities has been provided for through design and consent conditions. Transport design and consent conditions manage multi-modal transport interfaces and construction impacts.

- Policy 11 – The proposal seeks to ensure management plans and consents include methods that actively manage infrastructure interfaces, including construction impacts.

Overall, the proposed infrastructure package is generally consistent with the objective and policies of the NPS-I.

National Policy Statement for Freshwater Management

Objective: *The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:*

(a) first, the health and well-being of water bodies and freshwater ecosystems

(b) second, the health needs of people (such as drinking water)

(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.

Policy 1: *Freshwater is managed in a way that gives effect to Te Mana o te Wai.*

Policy 2: *Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.*

Assessment: The proposal seeks to give effect to this objective and policy including giving effect to Te Mana o Te Wai:

- The health and wellbeing of waterbodies and freshwater ecosystems has been prioritised. The conclusions reached in the Infrastructure Report and Ecology Assessment confirm that potential adverse effects on onsite waterbodies and receiving waterbodies will be less than minor. The Ecological Assessment (**Appendix 8**) finds that there will be positive effects for freshwater habitats in terms of a net gain in the quality of aquatic habitat and the amount and quality of natural inland wetland, as well as beneficial supporting land use and controls (stormwater quality protection, riparian protection, removal of farming practices). Overall, the Proposal is expected to deliver a significant net ecological gain for natural wetlands when compared with the ecological outcomes anticipated under the current land use.
- Protection and enhancement measures, including planting of the central wetlands and stream corridor, and the design and construction of stormwater infrastructure will ensure the continuous health and well-being of the natural watercourses and wetlands within the Site.

- While protecting and enhancing waterbodies and freshwater ecosystems within and downstream of the Site, the remaining land resource will be developed to provide sufficient residential capacity that will ensure that people and the community are able to provide for their social, economic and cultural well-being into the future.

- The Proposal has been informed by engagement with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

- The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

Policy 3: *Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments.*

Assessment: An integrated management approach has been applied through taking a cross-disciplinary approach to design of the Proposal. This approach has identified actual and potential adverse effects and has sought to avoid, minimise, mitigate or remedy those effects as appropriate.

Policy 4*: Freshwater is managed as part of New Zealand's integrated response to climate change.*

Assessment: Natural hazard risk and the future impacts of climate change have been considered as part of the Proposal. The site is able to address natural hazard risks such as flooding, including the predicted impacts of climate change such as increased rainfall intensity, through the use of nature-based solutions such as wetlands. As such, the Proposal is consistent with this policy.

Policy 6: *There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.*

Policy 7: *The loss of river extent and values is avoided to the extent practicable.*

Assessment: The Proposal is consistent with these policies. The Ecology Assessment and Substantive Application (including the NES-F assessment in **Appendix 6**) outline that less than minor residual adverse effects remain after avoidance, remediation and mitigation. Onsite mitigation will be applied so that there is no-net-loss of ecological values or wetland extent.

Policy 8: *The significant values of outstanding water bodies are protected.*

Policy 9: *The habitats of indigenous freshwater species are protected.*

Assessment: Measures have been incorporated into the proposal including Erosion and Sediment Controls and the use of fish passage compliant culverts to ensure that the habitats of indigenous freshwater species will be protected.

> ***Policy 14:*** *Information (including monitoring data) about the state of water bodies and freshwater ecosystems, and the challenges to their health and well-being, is regularly reported on and published.*

Assessment: The requirements to monitor environmental outcomes on the site, are set out in the Proposed Consent Conditions in **Appendix 7**, and such monitoring data would be provided to the GWRC and mana whenua. As such, the proposal is consistent with this policy.

> ***Policy 15:*** *Communities are enabled to provide for their social, economic, and cultural wellbeing in a way that is consistent with this National Policy Statement.*

Assessment: The granting of consent to this proposal would allow for a sector of the community to provide for their social and economic wellbeing, as well as providing a wider economic benefit to the community as a whole with respect to providing additional housing supply within a constrained housing market, in a way that is consistent with the NPS-UD.

National Policy Statement for Indigenous Biodiversity

Objective:

(a) to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and

(b) to achieve this:

(i) through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and

(ii) by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and

(iii) by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and

(iv) while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.

Policy 1: *Indigenous biodiversity is managed in a way that gives effect to the decision making principles and takes into account the principles of the Treaty of Waitangi.*

Policy 2: *Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through:*
(a) managing indigenous biodiversity on their land; and
(b) identifying and protecting indigenous species, populations and ecosystems that are taonga; and
(c) actively participating in other decision-making about indigenous biodiversity.

Policy 3: *A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.*

Policy 4: *Indigenous biodiversity is managed to promote resilience to the effects of climate change.*

Policy 5: *Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.*

Policy 7: *SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.*

Policy 8: *The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.*

Policy 9: *Certain established activities are provided for within and outside SNAs.*

Policy 10: *Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.*

Policy 13: *Restoration of indigenous biodiversity is promoted and provided for.*

Policy 14: *Increased indigenous vegetation cover is promoted in both urban and nonurban environments.*

Policy 15: *Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.*

In addition, Clause 3.16 is relevant to the management of indigenous biodiversity outside SNAs:

3.16 Indigenous biodiversity outside SNAs

1) *If a new subdivision, use, or development is outside an SNA and not on specified Māori land, any significant adverse effects of the new subdivision, use, or development on indigenous biodiversity outside the SNA must be managed by applying the effects management hierarchy.*

2) *All other adverse effects of any activities that may adversely affect indigenous biodiversity that is outside an SNA (other than indigenous biodiversity on specified Māori land (see clause 3.18)), must be managed to give effect to the objective and policies of this National Policy Statement.*

Assessment: There are no SNAs on site and, as outlined in the Ecological Assessment (**Appendix 8**), there is little in the way of indigenous biodiversity outside SNAs other than the wetlands and the stream. The proposal will provide for more indigenous vegetation on site and as such will have positive effects on terrestrial biodiversity.

Overall, the Proposal is generally consistent with the objective and policies of the NPS-IB.

Regional Policy Statement

Note: The RPS was made operative in 2013. Council notified Change 1 to the RPS in August 2022. Council made decisions on Change 1 to the RPS on 26 September 2024, some of which are subject to appeal under Schedule 1 of the Act and some are operative being progressed through the Freshwater Planning Process. The relevant objectives and policies from the decisions version of Change 1 are assessed below. Change 1 provisions or changes to provisions are underlined, provisions that are potentially subject to appeal under Schedule 1 are indicated with an *.

Chapter 3.1A - Climate Change

Objective CC.1*: *The Wellington Region is a low-emission and climate-resilient region, where climate change mitigation and climate change adaptation are an integral part of:*

(a) sustainable air, land, freshwater, and coastal management; and
(b) well-functioning urban areas and rural areas; and
(c) the planning and delivery of infrastructure (including regionally significant infrastructure).

Policy CC.9*: Reducing greenhouse gas emissions associated with subdivision, use or development – consideration*

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use or development has been planned in a way that contributes to reducing greenhouse gas emissions by optimising overall transport demand, by maximising mode shift from private vehicles to public transport or active modes, and supporting low and zero-carbon modes.

Assessment: The Proposal supports reductions in greenhouse gas emissions through enabling a well-functioning urban environment and multi-modal transport connectivity. Future residents will have multi-modal transport options including pedestrian and cycle connections to nearby amenities such as open space and commercial and community facilities. In addition, the provision of housing, healthcare, recreation, and other facilities on site will meet residents' daily needs and further reduce reliance on private vehicles. Further, the removal of stock from the site will have benefits in terms of reduced methane emissions. As such, the Proposal is consistent with this objective and policy**.**

Objective CC.4*: *Nature-based solutions are an integral part of climate change mitigation and climate change adaptation, improving the health, well-being and resilience of people and communities, indigenous biodiversity, and natural and physical resources.*

Policy CC.14*: Climate-responsive development – district and city council consideration*

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, require that development and infrastructure is located, designed and constructed in ways that provide for climate change mitigation, climate change adaptation and climate-resilience prioritising the use of nature-based solutions and informed by mātauranga Māori. This includes as appropriate to the scale and context of the activity:
(a) providing urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates:

i. prioritising the use of appropriate indigenous species, and
ii. contributing to achieving a wider target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050; and

(b) methods to increase water resilience, including by requiring harvesting of water at a domestic and/or community-scale for non-potable uses (for example by requiring rain tanks, rainwater re-use tanks, and setting targets for urban roof area rainwater collection); and
(c) avoiding significant adverse effects on the climate change mitigation, climate change adaptation and climate-resilience functions and values of an ecosystem, and avoiding, minimising, or remedying other adverse effects on these functions and values; and
(d) promoting efficient use of water and energy in buildings and infrastructure; and
(e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.

Policy CC.14A*: *Climate-responsive development – regional council consideration*

When considering an application for a resource consent, or a change, variation, or review of a regional plan, require that development and infrastructure is located, designed, and constructed in ways that provide for climate change mitigation, climate change adaptation and climate-resilience, prioritising the use of nature-based solutions and informed by mātauranga Māori. This includes, as appropriate to the scale and context of the activity:

(a) avoiding significant adverse effects on the climate change mitigation, climate change adaptation and climate-resilience functions and values of an ecosystem and avoiding, minimising, or remedying other adverse effects on these functions and values.

Assessment: As outlined in the Civil Infrastructure Report, the future impacts of climate change have been considered, and the site is able to address natural hazard risks such as flooding including the predicted impacts of climate change such as increased rainfall intensity through nature-based solutions such as constructed wetlands. As outlined in the Ecology Assessment, the site is currently lacking in biodiversity value through historical rural land uses including grazing. There are opportunities to greatly improve biodiversity including restoration of wetland, stream and terrestrial habitats and provide urban green space. As such, the Proposal is consistent with this objective and policies**.**

Chapter 3.4 – Fresh water

Objective 12: *The mana of the Region's waterbodies and freshwater ecosystems is restored and protected by ongoing management of land and water that:*
(a) returns the Region's water bodies and freshwater ecosystems to, and thereafter maintains them, in a state of tūhauora/good health; and
(b) improves the health and wellbeing of the Region's degraded waterbodies and freshwater ecosystems; and
(c) applies the Te Mana o te Wai hierarchy of obligations by prioritising:
i. first, the health and wellbeing of waterbodies and freshwater ecosystems,
ii. second, the health needs of people
iii. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future; and
(d) recognises and provides for the individual natural characteristics and processes of waterbodies including their natural form, and their associated ecosystems; and

(e) incorporates and protects mātauranga Māori and acknowledges and provides for the connections and relationships of mana whenua / tangata whenua with freshwater; and
(f) provides for the ability of mana whenua / tangata whenua to safely undertake their cultural and spiritual practices associated with freshwater, including mahinga kai; and
(g) actively involves mana whenua / tangata whenua in decision-making in relation to the Region's waterbodies; and
(h) includes engagement with communities, stakeholders, and territorial authorities; and
(i) supports the wellbeing and safety of the community, by providing for the ability to carry out recreational activities, in and around freshwater environments; and
(j) supports and protects an abundance and diversity of freshwater habitats for indigenous freshwater species and, where appropriate, the habitat of trout and salmon; and
(k) supports the reasonable, sustainable and efficient use of water for activities that benefit the Region's economy, including primary production activities, innovation and tourism.

Policy 40A: *Loss of extent and values of natural inland wetlands – consideration*
Policy 40B: *Loss of river extent and values - consideration*
Policy 41: *Managing ~~Minimising~~ the effects of earthworks and vegetation clearance ~~disturbance~~ – consideration*
Policy 42: Effects on freshwater and receiving environments from urban development – consideration ~~Minimising contamination in stormwater from development – consideration~~
Policy FW.XXB: *Mana whenua/tangata whenua and Te Mana o te Wai – consideration*

Assessment: The proposal responds to this objective and associated policies as follows:

- The health and wellbeing of waterbodies and freshwater ecosystems has been prioritised. The conclusions reached in the Infrastructure Report and Ecology Assessment confirm that potential adverse effects on onsite waterbodies and receiving waterbodies will be less than minor. The Ecological Assessment finds that there will be positive effects for freshwater habitats in terms of a net gain in the quality of aquatic habitat and the amount and quality of natural inland wetland, as well as beneficial supporting land use and controls (stormwater quality protection, riparian protection, removal of farming practices). Onsite mitigation will be applied so that there is no-net-loss of ecological values or wetland extent. Overall, the Proposal is expected to deliver a significant net ecological gain for natural wetlands when compared with the ecological outcomes anticipated under the current land use.
- Protection and enhancement measures, including planting of the central wetlands and stream corridor, and the design and construction of stormwater infrastructure will ensure the continuous health and well-being of the natural watercourses and wetlands within the Site.
- While protecting and enhancing waterbodies and freshwater ecosystems within and downstream of the Site, the remaining land resource will be developed to provide sufficient residential capacity that will ensure that people and the community are able to provide for their social, economic and cultural well-being into the future.
- The Proposal has been informed by engagement with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified

particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

- The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

The proposal is therefore consistent with the objective and associated policies.

Chapter 3.6 – Indigenous Ecosystems

Objective 16* *Indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of indigenous fauna, and the ecosystem processes that support these ecosystems and habitats, are ~~maintained~~ protected and, where appropriate, enhanced and restored to a healthy functioning state.*

Policy 47*: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values and other significant habitats of indigenous fauna – consideration

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, other significant habitats of indigenous fauna, and the ecosystem processes that support these ecosystems and habitats, and in determining whether the proposed activity is inappropriate particular regard shall be given to:

(a) maintaining connections within, or corridors between, habitats of indigenous flora and fauna and/or enhancing the connectivity between fragmented indigenous habitats; and

(b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses; and

(c) managing natural wetlands for the purpose of aquatic ecosystem health, recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape; and

(d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats; and

(e) providing seasonal or core habitat for indigenous species; and

(f) protecting the life supporting capacity of indigenous ecosystems and habitats; and

(g) ~~remedying or mitigating~~ minimising or remedying adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable except where Clause (i) and (j) apply; and

(h) the need for a precautionary approach to be adopted when assessing and managing the potential for adverse effects on indigenous ecosystems and habitats, where;

(i) the effects on indigenous biodiversity are uncertain, unknown, or little understood; and

(ii) those effects could cause significant or irreversible damage to indigenous biodiversity; and

(i) the provisions to protect significant biodiversity values in Policy 24B, and Policy 24C and the principles for biodiversity offsetting and biodiversity compensation in Policy 24A, except that Policy 24A and Policy 24B do not apply to REG activities and ET activities; and

(j) the provisions to manage the adverse effects of REG activities and ET activities on significant biodiversity values in Policy 24D; and

(k) protecting indigenous biodiversity values of significance to mana whenua / tangata whenua, including those associated with a significant site for mana whenua / tangata whenua identified in a regional or district plan; and

(l) enabling established activities affecting significant biodiversity values in the terrestrial environment to continue, where the effects of the activities:

(i) are no greater in intensity, scale and character; and

(ii) do not result in loss of extent, or degradation of ecological integrity, of any significant biodiversity values; and

(m) ensuring that the adverse effects of plantation forestry activities on significant indigenous biodiversity values in the terrestrial environment are managed in a way that:

(i) maintains significant indigenous biodiversity values as far as practicable, while enabling plantation forestry activities to continue; and

(ii) where significant biodiversity values are within an existing plantation forest, maintains the long-term populations of any Threatened or At Risk (declining) species present in the area over the course of consecutive rotations of production.

Objective 16A*: *The region's indigenous biodiversity is maintained and, where appropriate, enhanced and restored to a healthy functioning state, improving its resilience to increasing environmental pressures, particularly climate change.*

Policy IE.2A*: *Maintaining indigenous biodiversity in the terrestrial environment – consideration*

When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan or regional plan, indigenous biodiversity in the terrestrial environment that does not have significant indigenous biodiversity values as identified under Policy 23 and is not on Māori land, shall be maintained by:

(a) avoiding, remedying or mitigating the adverse effects of REG activities and ET activities to the extent practicable; and

(b) managing any significant adverse effects on indigenous biodiversity from any other proposed activity by applying the effects management hierarchy; and

(c) managing all other adverse effects on indigenous biodiversity to achieve at least no overall loss in indigenous biodiversity within the Wellington Region or district as applicable.

Objective 16B*: *Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity*

Policy IE.2*: *Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration*

When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development that may impact on indigenous biodiversity, recognise and provide for mana whenua / tangata whenua values and relationships associated with indigenous biodiversity, including by, but not restricted to:

(a) giving effect to the decision-making principles for indigenous biodiversity and, once they are established, the local expressions of the decision-making principles for indigenous biodiversity developed through Method IE.1; and

(b) enabling mana whenua / tangata whenua to exercise their roles as kaitiaki; and

(c) incorporating the use of mātauranga Māori in the management and monitoring of indigenous biodiversity; and

(d) supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga.

Assessment: The Application has identified actual and potential adverse effects on biodiversity and the Proposal has sought to avoid, minimise, mitigate or remedy those effects as appropriate.

The Ecological Assessment outlines constraints and opportunities with regard to indigenous biodiversity on-site and concludes that there are opportunities to not just maintain but to significantly restore and improve degraded habitats on the Site.

The Proposal has been informed by engagement with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

The proposal is therefore consistent with these objectives and policies.

Chapter 3.8 – Natural Hazards

Objective 19: *The risks ~~and consequences~~ to people, communities, ~~their~~ business~~es~~, property, and infrastructure ~~and the environment~~ from natural hazards and the effects of climate change ~~effects~~ are ~~reduced~~ avoided or minimised.*

Objective 21: *The resilience of our ~~C~~ communities, infrastructure ~~are more resilient to natural hazards, including the impacts~~ and the natural environment to natural hazards is ~~strengthened~~ improved, including to the short, medium, and long-term effects of climate change~~,~~ and sea level rise, ~~is strengthened,~~ and people are better prepared for the consequences of natural hazard events.*

Policy 29: ~~Avoiding inappropriate~~ Managing subdivision, use and development in areas at ~~high~~ risk from natural hazards – district and regional plans

Regional and district plans shall manage subdivision, use and development in areas at risk from natural hazards as follows:

(a) identify areas potentially affected by natural hazards; and

(b) use a risk-based approach to assess the consequences to new or existing subdivision, use and development from natural hazard and climate change impacts over at least a 100 year planning horizon which identifies the hazards or risks as being low, medium or high; and

(c) include hazard overlays, objectives, polices and rules to manage new and existing ~~avoid inappropriate~~ subdivision, use and development in those areas where the hazards or risks are assessed as low to medium in order to minimise or not increase the risks from natural hazards; and

(d) include hazard overlays, objectives, polices and rules to avoid new and minimise or not increase the risks to existing subdivision, use and development and hazard sensitive activities in areas where the hazards or risks are assessed as high, unless there is a functional or operational need to be located in these areas.

Policy 51: *Avoiding or ~~M~~minimising the risks and consequences of natural hazards - consideration*

When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be avoided or minimised, and/or in determining whether an activity is inappropriate particular regard shall be given to:

(a) the ~~frequency and magnitude~~ likelihood and consequences of the range of natural hazards that may adversely affect the ~~proposal or development~~ subdivision, use or development, including ~~residual risk~~ those that may be exacerbated by climate change and sea level rise; and

~~(b) the potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event;~~

(b) whether the location of the subdivision, use or development will foreseeably require hazard mitigation works in the future; and

(c) the potential for injury or loss of life, social and economic disruption and civil defence emergency management ~~and civil defence~~ implications – such as access routes to and from the site; and

(d) whether the subdivision, use or development causes any change in the risk~~s~~ and consequences from natural hazards in areas beyond the application ~~development~~ site; and

(e) minimising effects ~~the impact~~ of the ~~proposed~~ subdivision, use or development on any natural features that may act as a buffer to reduce the impacts from natural hazards; and ~~and where development should not interfere with their ability to reduce the risks of natural hazards;~~

(f) avoiding ~~inappropriate~~ subdivision, use or ~~and~~ development and hazard sensitive activities where the hazards and risks are assessed as high ~~in areas at high risk from natural hazards~~, unless there is a functional or operational need to be located in these areas; and

(g) appropriate ~~the potential need for~~ hazard risk management and/or adaptation ~~and mitigation~~ measures for subdivision, use or development in ~~moderate risk~~ areas where the hazards and risks are assessed as low to moderate, including an assessment of residual risk; and

(h) the allowance for floodwater conveyancing in identified overland flow paths and stream corridors; and

(i) the need to locate ~~habitable~~ floor ~~areas and access routes~~ levels of habitable buildings and buildings used as places of employment above the 1% annual exceedance probability (1:100 year) flood level, in identified flood hazard areas; and

(h) whether Te Ao Māori or mātauranga Māori provides a broader understanding of the hazards and risk management options.

Assessment: As outlined in the Infrastructure Design Report, the future impacts of climate change have been considered and provided for. The site is able to address natural hazard risks such as flooding, including the predicted impacts of climate change such as increased rainfall intensity, through nature-based solutions such as constructed wetlands. As such, the Proposal is consistent with these objectives and policies**.**

Chapter 3.9 - Regional form, design and function

Objective 22*: *A compact, well-designed, climate-resilient, accessible, and environmentally responsive regional form with well-functioning urban areas and rural areas, where:*

(a) there is sufficient development capacity to meet the needs of current and future generations, improve housing affordability and quality, and provide access to a diversity of housing typologies within neighbourhoods which enable choice; and

(b) Māori are able to express their culture and traditions, and the relationship of mana whenua / tangata whenua with their culture, ancestral land, water, sites, wāhi tapu and other taonga is provided for; and

(c) Te Mana o te Wai is given effect to; and

(d) intensification occurs within existing urban zones in appropriate places where it is environmentally responsive; and

(e) subdivision, use and development is located, designed, and constructed in a way that is climate-resilient and contributes to reducing greenhouse gas emissions; and

(f) built environments, including integrated transport infrastructure, meet the health and wellbeing needs of all people, with multi-modal access including active transport, between housing, jobs, community services, centres, green space, and open space; and
(g) the biophysical characteristics, location, recognised values, capability and limitations of land inform its use and development; and
(h) the productive capacity of rural land is retained; and
(i) existing urban-zoned land, and infrastructure capacity is used effectively and efficiently; and
(j) new or upgraded infrastructure is integrated and sequenced with development; and
(k) development densities are sufficient to support the provision and ongoing maintenance of infrastructure; and
(l) a variety of residential, commercial, mixed use and industrial development in appropriate locations is provided which contributes to viable and vibrant centres at a range of scales, and industrial-based employment locations; and
(m) the safe and efficient operation of regionally significant infrastructure is protected from potential reverse sensitivity effects.

Assessment: The Proposal responds to Objective 22 as follows:

- It provides development capacity in an area zoned for residential development to meet the needs of future generations, including providing affordable housing;
- In designing the development and preparing this Substantive Application, the Applicant has engaged with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring;
- The Proposal supports reductions in greenhouse gas emissions through enabling a well-functioning urban environment and multi-modal transport connectivity. Future residents will have multi-modal transport options including pedestrian and cycle connections to nearby amenities such as open space and commercial and community facilities. In addition, the provision of housing, healthcare, recreation, and other facilities on site will meet residents' daily needs and further reduce reliance on private vehicles. Further, the removal of stock from the site will have benefits in terms of reduced methane emissions.
- The biophysical context of the site has been considered, with management approaches available for constraints and opportunities identified to achieve net positive environmental outcomes;
- The Site is contiguous with urban zoned land and makes use of existing transport networks and other infrastructure including reticulated three waters services;
- The Proposal contributes to the mix of land use activities sought in (l); and
- There are no reverse sensitivity effects identified on regionally significant infrastructure.

In summary, the proposal is consistent with this Objective.

Policy 54: *Achieving the region's urban design principles – consideration*

When considering an application for a notice of requirement, or a change, variation or review of a district or regional plan, for development, particular regard shall be given to achieving the region's urban design principles in Appendix 2.

Assessment: Particular regard has been had to the principles in Appendix 2 in the preparation of this application as follows:

- Context – the immediate and wider context of the site has been considered as outlined in Section 5 of the Substantive Application; the District Plan anticipates residential development of the site.
- Character – the Proposal will result in the changing of the character of the site from rural to urban, and this principle recognises that character is dynamic and evolving, not static. Nevertheless, technical reports have recommended mitigations with regard to managing character including providing landscaping to provide amenity, and ecological mitigations to restore degraded habitats on site;
- Choice – the Proposal provides housing choice through providing development capacity to meet the needs of future generations;
- Connections – the Proposal provides multi-modal transport opportunities including active modes to provide connectivity between the site and community and commercial facilities. In addition, the provision of housing, healthcare, recreation, and other facilities on site will meet residents' daily needs and further reduce reliance on private vehicles;
- Creativity – The Proposal demonstrates creativity through its integrated master-planned design, combining retirement living, healthcare, recreation, ecological restoration and water-sensitive urban design within a cohesive development. Nature-based stormwater solutions, wetland restoration, ecological corridors and open spaces are incorporated as both functional infrastructure and amenity features, creating a distinctive environment that responds to the site's unique landscape and environmental context;
- Custodianship – the Proposal positively responds to these matters including managing landscape and ecological values as well as natural hazard risk;
- Collaboration – the proposal positively responds to these matters including following best practice with regard to managing landscape and ecological values as well as natural hazard risk.

Policy 57: Integrating land use and transportation – consideration

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, seek to achieve integrated land use and transport within the Wellington Region by: ~~for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy:~~

(a) locating development in areas near centres and well-serviced by existing or planned public transport, to minimise private vehicle travel and trip length and maximise mode shift to public transport or active modes; and

(b) *supporting connectivity with, and accessibility to public services or amenities, key centres of employment activity or retail activity via public and active transport networks; and*

(c) *supporting a safe, reliable, equitable, inclusive and efficient transport network including through connections with the wider transport network; and*

(d) *providing safe and accessible multi-modal transport networks along connected routes that are designed for public and active transport, while recognising that the delivery of public transport services may not always be efficient or practical; and*

(e) *supporting and enabling the rapid transport network and the growth corridors in the Wellington Region, including:*

i. *Western Growth Corridor – Tawa to Levin;*

ii. *Eastern Growth Corridor – Hutt to Masterton;*

iii. *Let's Get Wellington Moving Growth Corridor; and*

(f) *minimising the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.*

~~*(a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network;*~~

~~*(b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas;*~~

~~*(c) whether there is good access to the strategic public transport network;*~~

~~*(d) provision of safe and attractive environments for walking and cycling; and*~~

~~*(e) whether new, or upgrades to existing, transport network infrastructure have been appropriately recognised and provided for.*~~

Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration

When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, ~~for subdivision, use or development,~~ seek to achieve development that is integrated with infrastructure, in a way that: ~~particular regard shall be given to whether the proposed subdivision, use or development is located and sequenced to:~~

(a) makes effective, efficient and safe use of existing infrastructure capacity; and

(b) makes provision for the development, funding, implementation and operation of infrastructure serving the area in question; and

(c) all infrastructure required to serve new development is available or is able to be delivered in a timeframe appropriate to service the development, and this may require timing or staging development accordingly.

~~*(a) make efficient and safe use of existing infrastructure capacity; and/or*~~

~~*(b) coordinate with the development and operation of new infrastructure.*~~

Assessment: A Transport Assessment has been undertaken which concludes that the Proposal will not have any effects on the transport network that cannot be addressed with appropriate engineering

solutions. The Proposal provides multi-modal transport opportunities including active modes to provide connectivity between the site and community and commercial facilities.

As outlined in Section 15 of the Substantive Application, the Proposal is supported by an Infrastructure Report which finds that the Site can be adequately serviced. The Site benefits from existing reticulated three waters infrastructure, and a roading network with additional capacity.

> ***Objective 22A:*** *To achieve sufficient development capacity to meet expected housing demand in the short-medium and long term in any tier 1 urban environment within the Wellington Region, the housing bottom lines in Table 9A are to be met or exceeded in the short-medium and long term in the tier 1 urban environment.*
>
> *Note: Objective 22A and Table 9A were inserted into the Regional Policy Statement directly under section 55(2)(b) of the Resource Management Act 1991, i.e. without reference to RMA Schedule 1, as directed by the National Policy Statement on Urban Development 2020. The short-medium term (2021- 2031) and long term (2031- 2051) housing bottom lines are drawn from the Wellington Regional Housing and Business Development Capacity Assessment, Housing update – May 2022.*

Assessment: As outlined in the Economic Assessment, the Proposal provides development capacity to assist in meeting housing bottom lines in the Region and District. The Proposal will contribute to meeting the District's housing demand as it will provide for an increase in housing supply, including in the aged-care housing typology that is in demand. This will cater for Kāpiti's ageing population while freeing up existing residential housing stock for others in the market reducing land demand pressure.

Chapter 3.10 - Resource management with tangata whenua

> ***Objective 24:*** *The principles of the Treaty of Waitangi are taken into account in a systematic way when resource management decisions are made.*
>
> ***Objective 25:*** *The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region's natural and physical resources.*
>
> ***Objective 26:*** *Mauri is sustained, particularly in relation to coastal and fresh waters.*
>
> ***Objective 28:*** *The cultural relationship of Māori with their ancestral lands, water, sites, wahi tapu and other taonga is maintained.*
>
> ***Policy 48:*** *Principles of the Treaty of Waitangi*
> *When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to:*
>
> *(a) the principles of the Treaty of Waitangi; and*
> *(b) Waitangi Tribunal reports and settlement decisions relating to the Wellington region.*
>
> ***Policy 49:*** *Recognising and providing for matters of significance to tangata whenua*
> *When preparing a change, variation or review of a district or regional plan, the following matters shall be recognised and provided for:*

(a) the exercise of kaitiakitanga;
(b) mauri, particularly in relation to fresh and coastal waters;
(c) mahinga kai and areas of natural resources used for customary purposes; and
(d) places, sites and areas with significant spiritual or cultural historic heritage value to tangata whenua.

Assessment: In designing the development and preparing this Substantive Application, the Applicant has engaged with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

Although no recorded archaeological sites are located within the Site, the wider area has a history of Māori occupation and there remains potential for subsurface material to be encountered. The proposed archaeological authority and accidental discovery procedures will ensure that any archaeological or cultural material discovered during earthworks is appropriately identified and managed.

Natural Resources Plan

3.1 Ki Uta Ki Tai and Integrated Catchment Management

Objective O1: *Air, land, fresh water bodies and the coastal marine area are managed as integrated and connected resources; ki uta ki tai – mountains to the sea.*

Objective O2: *The importance and contribution of air, land, water and ecosystems to the social, economic and cultural well-being and health of people and the community are recognised in the management of those resources.*

Objective O3: *Mauri particularly the mauri of fresh and coastal waters is sustained and, where it has been depleted, natural resources and processes are enhanced to replenish mauri.*

Objective O4: *The intrinsic values of fresh water and marine ecosystems are recognised and the life supporting capacity of water is safeguarded.*

Policy P1: *Ki uta ki tai and integrated catchment management*
Air, land, fresh water bodies and the coastal marine area will be managed recognising ki uta ki tai by using the principles of integrated catchment management. These principles include:

(a) decision-making using the catchment as the spatial unit, and
(b) applying an adaptive management approach to take into account the dynamic nature and processes of catchments, and
(c) coordinated management, with decisions based on best available information and improvements in technology and science, and
(d) taking into account the connected nature of resources and natural processes within a catchment, and
(e) recognising links between environmental, social, cultural and economic sustainability of the catchment.

Policy P4: *Precautionary approach*
Use and development shall be managed with a precautionary approach where there is limited information regarding the effects and any adverse effects are potentially significant.

Assessment: An integrated management approach has been applied through taking a cross-disciplinary approach to design of the Proposal.

This approach has identified actual and potential adverse effects and has sought to avoid, minimise, mitigate or remedy those effects as appropriate. Direct physical effects on wetlands have been avoided to the greatest extent practicable (refer to **Appendix 6** NES-F Analysis) and a range of monitoring and mitigation measures are proposed to monitor the hydrological integrity in the existing wetlands from the proposed works.

Best practice sediment control measures are proposed in line with regional guidance that will ensure that any potential sediment related effects on waterbodies are appropriately addressed.

Mana whenua are best placed to comment on the current state of mauri and the relative effects of the proposed development. It is likely that the mauri of the site is currently considered to be depleted due to rural land uses taking place which have degraded waterbodies on site. The Proposal seeks to

retire land from grazing and undertake significant landscape and riparian planting which will improve biodiversity.

The conclusions reached in the Infrastructure Report and Ecological Assessments confirm that potential effects on onsite waterbodies and receiving waterbodies will be less than minor. The Ecological Assessment finds that there will be positive effects for freshwater habitats in terms of a net gain in the quality of aquatic habitat and the amount and quality of natural inland wetland. It outlines how the Proposal provides opportunities to ensure environmental enhancement of degraded waterways on site.

In designing the development and preparing this Substantive Application, the Applicant has engaged with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

In regard to Policy P4, it is considered that the Application provides sufficient information whereby a precautionary approach is not required.

Overall, the Proposal is consistent with these objectives and policies.

3.2 Beneficial use and development

> ***Objective O7*** *The recreational values of the coastal marine area, rivers and lakes and their margins and natural wetlands are maintained and where appropriate for recreational purposes, is enhanced.*
>
> ***Objective O8*** *Public access to and along the coastal marine area and rivers and lakes is maintained and enhanced, other than in exceptional circumstances, in which case alternative access is provided where practicable.*
>
> ***Policy P6*** *Uses of land and water*
> *The cultural, social and economic benefits of using land and water for:*
> *…*
> *(h) contact recreation and Māori customary use; and*
> *…*
> *(j) enabling urban development where it maintains the quality of the natural environment*
>
> ***Policy P7*** *Beneficial activities*
> *The following activities are recognised as beneficial and generally appropriate:*
> *(a) activities for the purpose of restoring natural character, aquatic ecosystem health, mahinga kai, outstanding water bodies, sites with significant mana whenua values, and sites with significant indigenous biodiversity values, and*

(b) activities that restore natural features such as beaches, dunes or wetlands that can buffer development from natural hazards, and
(c) day-lighting of piped streams, and
(d) removal of aquatic weeds, and pest plants and animal pests, and
(e) the establishment of river crossings (culverts and bridges) or fences and fence structures that will result in the exclusion of regular livestock access from a water body, and
(f) the retirement, fencing and planting and management of riparian margins, and
(g) the retirement of erosion prone land from livestock access, and
(h) maintenance, and use and upgrade of existing structures in the coastal marine area, natural wetlands and the beds of rivers and lakes (noting that Policy P33 will apply with respect to fish passage), and
(i) removal of dangerous or derelict structures in the coastal marine area, natural wetlands and beds of lakes and rivers, and
(j) structures necessary to provide for monitoring resource use or the state of the environment in the coastal marine area, natural wetlands and beds of lakes and rivers, and
(k) activities necessary to maintain safe navigation, and
(l) artworks that support and enhance public open space.

Policy P8 *Public access to and along the coastal marine area and the beds of lakes and rivers Maintain and enhance the extent or quality of public access to and along the coastal marine area and the beds of lakes and rivers except where it is necessary to:*
(a) protect the values of estuaries, sites with significant mana whenua values identified in Schedule C (mana whenua), sites with significant historic heritage value identified in Schedule E (historic heritage) and sites with significant indigenous biodiversity value identified in Schedule F (indigenous biodiversity), or
(b) protect public health and safety, or protect Wellington International Airport and Commercial Port Area security, or
(c) provide for a temporary activity such as construction, a recreation or cultural event or stock movement, and where the temporary restrictions shall be for no longer than reasonably necessary before access is fully reinstated, and
with respect to (a) and (b), where it is necessary to permanently restrict or remove existing public access, the loss of public access shall be mitigated or offset by providing enhanced public access at a similar or nearby location to the extent reasonably practicable.

Assessment: There are no parts of the site that are currently open to the public. The Proposal will provide for improved public access to the waterbodies, albeit this will be largely limited to residents and visitors of the village.

The use of land and water will also enable the proposed urban development that has sought to not only maintain the quality of the environment as required by Policy P6 but enhance it.

The Proposal includes many of the beneficial activities referenced in Policy P7 including:

- restoring the natural character of waterbodies;
- removing pest plants;
- excluding stock from waterbodies;
- planting riparian margins;

- retiring grazing activities,
- upgrading existing structures in streams (including upgrading culverts to a modern standard); and
- undertaking monitoring of the state of waterways.

Overall, the proposal is consistent with these objectives and policies.

3.3 Māori relationships

Objective O12: *The relationships of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga are recognised and provided for, including:*

(a) maintaining and improving opportunities for Māori customary use of the coastal marine area, rivers, lakes and their margins and natural wetlands, and

(b) maintaining and improving the availability of mahinga kai species, in terms of quantity, quality and diversity, to support Māori customary harvest, and

(c) providing for the relationship of mana whenua with Ngā Taonga Nui a Kiwa, and

(d) protecting sites with significant mana whenua values from use and development that will adversely affect their values and restoring those sites to a state where their characteristics and qualities sustain the identified values.

Objective O13: *Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making in relation to the use, development and protection of natural and physical resources.*

Policy P18: *Mauri*

The mauri of fresh and coastal waters shall be recognised as being important to Māori and is sustained and enhanced, including by:

(a) managing the individual and cumulative adverse effects of activities that may impact on mauri in the manner set out in the rest of the Plan, and

(b) providing for those activities that sustain and enhance mauri, and

(c) recognising and providing for the role of kaitiaki in sustaining mauri.

Policy P19: *Mana whenua relationships with Ngā Taonga Nui a Kiwa*

The relationships between mana whenua and Ngā Huanga o Ngā Taonga Nui a Kiwa identified in Schedule B (Ngā Taonga Nui a Kiwa) will be recognised and provided for by:

(a) having particular regard to the values and Ngā Taonga Nui a Kiwa huanga identified in Schedule B (Ngā Taonga Nui a Kiwa) when applying for, and making decisions on resource consent applications, and developing Whaitua Implementation Programmes, and

(b) informing iwi authorities of relevant resource consents relating to Ngā Taonga Nui a Kiwa, and

(c) recognising the relevant iwi authority/ies as an affected party under RMA s95E where activities risk having a minor or more than minor adverse effect on Ngā Huanga o Ngā Taonga Nui a Kiwa or on the significant values of a Schedule C site which is located downstream, and

(d) working with mana whenua, landowners, and other interested parties as appropriate, to develop and implement restoration initiatives within Ngā Taonga Nui a Kiwa, and

(e) the Wellington Regional Council and iwi authorities implementing kaupapa Māori monitoring of Ngā Taonga Nui a Kiwa.

***Policy P20:** Māori values*

The cultural relationship of Māori with air, land and water shall be recognised and the adverse effects on this relationship and their values shall be minimised.

***Policy P21:** Exercise of Kaitiakitanga*

Kaitiakitanga shall be recognised and provided for by involving mana whenua in the assessment and decision-making processes associated with use and development of natural and physical resources including;

(a) managing activities in sites with significant mana whenua values listed in Schedule C (mana whenua) in accordance with tikanga and kaupapa Māori as exercised by mana whenua, and

(b) the identification and inclusion of mana whenua attributes and values in the kaitiaki information and monitoring strategy in accordance with Method M2, and

(c) identification of mana whenua values and attributes and their application through tikanga and kaupapa Māori in the maintenance and enhancement of mana whenua relationships with Ngā Taonga Nui a Kiwa.

Assessment: In preparing this application, the Applicant has engaged with iwi authorities and relevant Māori groups, predominantly Ātiawa ki Whakarongotai. That engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

Overall, the Proposal is consistent with these objectives and policies.

3.4 Natural character, form and function

Objective O14 *The natural character of the coastal marine area, natural wetlands, and rivers, lakes and their margins is preserved and protected from inappropriate use and development.*

Policy P24: *Preserving and protecting natural character from inappropriate use and development*
To preserve natural character and protect it from inappropriate use and development by:

- *(a) avoiding adverse effects of activities on the natural character of areas within the coastal environment that have outstanding natural character, and*
- *(b) avoiding significant adverse effects and avoid remedy and mitigate other adverse effects of activities on the natural character of areas within the coastal environment that do not have outstanding natural character, and*
- *(c) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that have outstanding natural character, provided that the outstanding natural character of the area taken as a whole is retained, and*
- *(d) outside the coastal environment, avoiding and, where avoidance is not practicable, remedying or mitigating significant adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that have high natural character, provided that the high natural character of the area taken as a whole is retained, and*
- *(e) outside the coastal environment, avoiding, remedying or mitigating other adverse effects of activities on the natural character of wetlands, rivers, lakes and their margins that are not addressed under (c) or (d) of Policy P24.*

Assessment: There are no areas or features within the site that are identified as having outstanding natural character. The natural character of waterways within, adjacent and downstream of the Site will be protected via measures including wetland creation and stream enhancement through riparian planting.

Overall, the Proposal is consistent with this objective and policy.

3.5 Natural hazards

Objective O15 *The hazard risk and residual hazard risk, from natural hazards and adverse effects of climate change, on people, the community, the environment and infrastructure are acceptable.*

Objective O16 *Inappropriate use and development in high hazard areas is avoided.*

Policy P25: *High hazard areas*
Use and development, including hazard mitigation methods, in on or over high hazard areas shall be managed to ensure that:

- *(a) they have a functional need or operational requirement or there is no practicable alternative to be so located, and*
- *(b) an overall increase in risk of social, environmental and economic harm is avoided, and*

(c) *the hazard risk and/or residual hazard risk to the development, assessed using a risk-based approach, is acceptable or as low as reasonably practicable, recognising that in some instances an increase in risk to the development may be appropriate, and*
(d) *the development does not cause or exacerbate hazard risk in other areas, and unless effects are avoided, remedied or mitigated in accordance with a hazard risk management strategy, and*
(e) *adverse effects on natural processes (coastal, riverine and lake processes) are avoided, remedied, or mitigated, and*
(f) *natural cycles of erosion and accretion and the potential for natural features to fluctuate in position over time, including movements due to climate change and sea level rise over at least the next 100 years, are taken into account.*

Policy P27: *Hazard mitigation measures*
Hard hazard engineering mitigation and protection methods shall be discouraged except where it is necessary to protect:
(a) *existing, or upgrades to, infrastructure including Regionally Significant Infrastructure, or*
(b) *new Regionally Significant Infrastructure, or*
(c) *significant existing development, and*

in respect of (a), (b) and (c):
(d) *there is no reasonable or practicable alternatives to mitigate hazard risk and residual hazard risk, and*
(e) *the mitigation and protection methods are suitably located and designed, and where appropriate certified by a qualified, professional engineer, and*
(f) *the use of soft engineering options are incorporated and used, where appropriate,*

and either:
(g) *any adverse effects are no more than minor, or*
(h) *where the environmental effects are more than minor the works form part of a hazard risk management strategy.*

Policy P28: *Effects of climate change*
Particular regard shall be given to the potential for climate change
(a) *to threaten biodiversity, aquatic ecosystem health and mahinga kai, or*
(b) *to cause or exacerbate natural hazard events over at least the next 100 years that could adversely affect use and development*

including as a result of:
(c) *coastal erosion and inundation (storm surge), and*
(d) *river and lake flooding and erosion, aggradation, decreased minimum flows, and*
(e) *stormwater ponding and impeded drainage, and*
(f) *relative sea level rise, using reliable scientific data for the Wellington region.*

Policy P29: *Natural buffers*
Provide for the restoration or enhancement of natural features such as beaches, dunes or wetlands that buffer development from natural hazards and ensure the adverse effects of use and development on them are avoided, remedied, or mitigated.

Assessment: Natural hazard risk and the future impacts of climate change have been considered as part of the proposal. The site is able to address natural hazard risks such as flooding, including the predicted impacts of climate change such as increased rainfall intensity, through the use of nature-based solutions such as the centralised wetlands. As such, the Proposal is consistent with these objectives and policies.

3.6 Water quality

Objective O17: *The quality of groundwater, water in surface water bodies, and the coastal marine area is maintained or improved.*

Objective O18: *Rivers, lakes, natural wetlands and coastal water are suitable for contact recreation and Māori customary use, including by:*

(a) maintaining water quality, or

(b) improving water quality in:

…

iii.all other rivers and lakes and ***natural wetlands*** *to meet, as a minimum and within reasonable timeframes, the secondary contact recreation objectives in Table 3.2.*

Assessment: Effects on freshwater have sought to be minimised via the management of sediment effects and the ongoing stormwater management proposed in the SMP (**Appendix 18**) and the implementation of monitoring regimes included in the Proposed Consent Conditions in **Appendix 7**.

The proposed ESC measures together with the proposed WSUD design will ensure that the Proposal can be undertaken in such a way that:

- The Proposal will not have adverse effects on contact recreation within adjacent or downstream watercourses;
- The life-supporting quality of water will be safeguarded; and
- The recreational values of freshwater will be significantly enhanced.

Overall, the Proposal is consistent with these objectives.

3.7 Biodiversity, aquatic ecosystem health and mahinga kai

Objective O19: *Biodiversity, aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area are safeguarded such that:*

(a) Water quality, flows, water levels and aquatic and coastal habitats are managed to maintain biodiversity, aquatic ecosystem health and mahinga kai; and

(b) Where an objective in Tables 3.4, 3.5, 3.6, 3.7 or 3.8 is not met, a fresh water body or coastal marine area is improved over time to meet that objective.

(c) Restoration of aquatic ecosystem health and mahinga kai is encouraged.

Policy P30*: Manage the adverse effects of use and development on biodiversity, aquatic ecosystem health and mahinga kai to:*

Hydrology

(a) maintain or where practicable restore natural flow characteristics and hydrodynamic processes, and the natural pattern and range of water level fluctuations in rivers, lakes and natural wetlands, and

Water quality

(b) maintain or improve water quality including to assist with achieving objectives in Tables 3.4, 3.5, 3.6, 3.7 and 3.8 of Objective O25, and

Aquatic habitat diversity and quality

(c) *restore aquatic habitat diversity and quality, including:*
(i) the form, frequency and pattern of pools, runs, and riffles in rivers, and
(ii) the natural form of rivers, lakes, natural wetlands and the coastal marine area, and

(d) *where practicable restore the connections between fragmented aquatic habitats, and Riparian habitats (g) maintain or where practicable restore riparian habitats*

Critical habitat for indigenous aquatic species and indigenous birds

(e) *maintain or where practicable restore habitats that are important to the life cycle and survival of indigenous aquatic species and the habitats of indigenous birds in the coastal marine area, natural wetlands and the beds of lakes and rivers and their margins that are used for breeding, roosting, feeding, and migration, and*

Critical life cycle periods

(f) *avoid, minimise or remedy adverse effects on aquatic species at times which will most affect the breeding, spawning, and dispersal or migration of those species, including timing the activity, or the adverse effects of the activity, to avoid times of the year when adverse effects may be more significant, and*

Riparian habitats

(g) *maintain or where practicable restore riparian habitats, and*

Pests

(h) *avoid the introduction, and restrict the spread, of aquatic pest plants and animals.*

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 avoided and/or minimised, they are remedied, except as provided for in (a) to (g), and

(e) where significant more than minor residual adverse effects cannot be avoided, minimised, or remedied, biodiversity offsetting is provided where possible remain, it is appropriate to consider the use of biodiversity offsets., 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. In relation to activities within the beds of lakes, rivers and natural wetlands, (e) to (g) only apply to activities which meet the exceptions in Policy P110.

Objective O21 *Vegetated riparian margins are established, and maintained. or restored to enhance water quality, aquatic ecosystem health, mahinga kai and indigenous biodiversity of rivers, lakes, natural wetlands and the coastal marine area.*

Policy P32 *- Fish Passage The construction or creation of new barriers impeding the efficient and safe passage of fish and kōura species at all their life stages shall be avoided, except where this is required for the protection of indigenous fish and kōura populations.*

Policy P33 *- Restoring Fish Passage Remediation to provide for the efficient and safe passage of indigenous fish and kōura is promoted, and regard shall be had to requiring this when extending, altering or reconstructing instream structures, where this is appropriate for the management and protection of indigenous fish and kōura populations.*

Objective O22: *The extent and significant values of natural wetlands are protected, and their condition is restored. Where the significant values relate to biodiversity, aquatic ecosystem health and mahinga kai, restoration is to a healthy functioning state as defined by Table 3.7.*

Policy P34: *Values of wetlands*
Activities in and adjacent to natural wetlands shall be managed to maintain and, where appropriate, restore their condition and their values including:

(a) as habitat for indigenous flora and fauna, and
(b) for their significance to mana whenua, and
(c) for their role in the hydrological cycle including flood protection, and
(d) for nutrient attenuation and sediment trapping, and
(e) as a fisheries resource, and (f) for recreation, and
(g) for education and scientific research.

Policy P35 *- Restoration of wetlands*
The restoration of natural wetlands and the construction of artificial wetlands to meet the water quality, aquatic ecosystem health and mahinga kai objectives set out in Tables 3.7 and 3.8, to provide habitat for indigenous flora and fauna, and to carry out the physical and ecological functions of natural wetlands, and to provide for amenity values where this aligns with restoration appropriate to the area and wetland type shall be encouraged and supported.

Policy P110 *- Loss of extent and values of the beds of lakes and rivers, and natural wetlands*
The loss of extent and values of the beds of lakes and rivers and natural wetlands, including as a result of reclamation and drainage, is avoided, except where:

(a) in a natural inland wetland:
(i) the loss of extent or values arises from any of the following:
1. the customary harvest of food or resources undertaken in accordance with tikanga Māori, or
2. restoration activities, or
3. scientific research, or
4. the sustainable harvest of sphagnum moss, or
5. the construction or maintenance of wetland utility structures, or
6. the maintenance or operation of specified infrastructure, or other infrastructure, or
7. natural hazard works, and
8. where the activity involves reclamation or drainage there are no other practicable alternative methods of providing for the activity,

Or
(ii) for specified infrastructure:
1. the activity, including any reclamation and drainage, is necessary for the construction or upgrade of specified infrastructure, and

2. the specified infrastructure will provide significant national or regional benefits, and
3. there is a functional need for the specified infrastructure in that location,
Note
The effects of any activity that requires a resource consent under this policy will be managed through applying the effects management hierarchy as set out in Policies P31, P37, P38, or P48.
…

Objective O23 - *The passage of fish and kōura is maintained, or is improved, by instream structures, except where it is desirable to prevent the passage of some fish species in order to protect desired fish species, their life stages or their habitats.*

Assessment: Potential adverse effects on ecological values of the identified natural wetlands on the site have been assessed against the mitigation hierarchy.

This approach has identified actual and potential adverse effects and has sought to avoid, minimise, mitigate or remedy those effects as appropriate. Direct physical effects on waterways have been avoided to the greatest extent practicable (refer to **Appendix 6** NES-F Analysis) and a range of monitoring and mitigation measures are proposed to monitor the hydrological integrity in the existing wetlands from the proposed works.

The Proposal will result in a net-gain effect with respect to biodiversity and aquatic ecosystem health through:

- New culverts will be designed and constructed to enable fish passage in line with relevant guidelines. The proposed works seek to restore and enhance the ecosystem health of these waterbodies;
- Water quality will be maintained and, in some cases improved, through improving waterbodies and riparian habitats and the retirement of erosion prone land from grazing (refer Ecological Assessment **Appendix 8**); and
- In respect of the wetlands, direct effects have been avoided to the greatest extent practicable and other effects will be addressed through application of the effects management hierarchy as well as via adherence to sediment control measures included in the Infrastructure Design Report (**Appendix 16**). In addition, wetland improvement are proposed via the imposition of conditions requiring planting of the wetlands.

Policy P110 seeks to avoid the loss of wetland extent unless one of the exemptions apply under subclauses (a)(i)(1) – (8). As set out in **Appendix 6**, other practicable alternative methods of providing for the development have been considered with regard to avoiding or minimising reclamation or drainage with the proposed development being identified as the preferred option. As such subclause (a)(i)(8) applies.

It is considered that Policy P110 does not give effect to clause 3.22(1)(c) of the NPS-FM which would otherwise provide a more enabling pathway for urban development with regard to these works. It is considered that Policy P110 should therefore be given little weight.

Overall, the Proposal is consistent with these objectives and policies.

3.8 Sites with significant values

Objective O28 *Ecosystems and habitats with significant indigenous biodiversity values are protected from the adverse effects of use and development, and where appropriate restored to a healthy functioning state including as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.*

Policy P42 *Ecosystems and habitats with significant indigenous biodiversity values*
Protect in accordance with Policy P31 and policies P38-P41 and, where appropriate, and restore the following ecosystems and habitats with significant indigenous biodiversity values:

(a) the rivers and lakes with significant indigenous ecosystems identified in Schedule F1 (rivers/lakes), and
(b) the habitats for indigenous birds identified in Schedule F2 (bird habitats), and
(c) significant natural wetlands, including the significant natural wetlands identified in Schedule F3 (identified significant natural wetlands), and
(d) the ecosystems and habitat-types with significant indigenous biodiversity values in the coastal marine area identified in Schedule F4 (coastal sites) and Schedule F5 (coastal habitats).

Assessment: While there are no mapped sites in the NRP that identify any areas of significant indigenous biodiversity value, Policy P42 states that all natural wetlands in the Wellington Region are considered to be ecosystems and habitats with significant indigenous biodiversity values as they meet at least two of the criteria listed in Policy 23 of the RPS for identifying indigenous ecosystems and habitats with significant indigenous biodiversity values; being representativeness and rarity.

The Proposal is consistent with this objective and policy for the following reasons:

- A key aspect of the Proposal is its commitment to restoring impacted ecosystems to a healthy functioning state. This includes active measures and strategies aimed at enhancing biodiversity, protecting biodiversity, improving ecosystem health, and enhancing the overall resilience of these habitats;
- The Proposal will improve the condition of the stream and wetlands from their current state by implementing measures as outlined in the Ecology Assessment;
- Monitoring the ongoing health of the wetlands will ensure that the hydrological integrity of the retained and enhanced wetlands are maintained;
- Implementing a comprehensive range of sediment control tools to protect the values of receiving waterbodies;
- The Proposal acknowledges the dynamic nature of ecosystems and habitats. It implements collaborative and adaptive management practices, allowing for ongoing monitoring to ensure the continued effectiveness of protection and restoration efforts; and
- As outlined in the Ecological Assessment, the Proposal has followed an effects management hierarchy approach in managing adverse effects as specified in Policy P41. The GWRC guidelines and principles for offsetting have been utilised for the analysis.

Policy P43 *Effects on the spawning and migration of indigenous fish species*
Avoid more than minor adverse effects of activities on indigenous fish species known to be present in any water body identified in Schedule F1 (rivers/lakes) as habitat for indigenous fish species or Schedule F1b (inanga spawning habitats), during known spawning and migration times identified in Schedule F1a (fish spawning/migration). These activities may include the following:

(a) discharges of contaminants, including sediment, and
(b) disturbance of the bed or banks that would affect spawning habitat at peak times of the year, and
(c) damming, diversion or taking of water which leads to loss of flow or which makes the river impassable to migrating indigenous fish.

Assessment: The Proposal is consistent with this policy as it includes measures such as the management of discharges including sediment and contaminants, ensuring new culverts provide fish passage and ecological monitoring of proposed wetland works. Proposed Consent Conditions in **Appendix 7** have been included to specifically manage these works.

3.10 3.11 Land use

Objective O34: *The adverse effects on soil and water from land use activities are minimised, including to assist with achieving the outcomes and indicators of desired environmental states for water in Tables 3.1 to 3.8.*

Objective O35*: The adverse effects of livestock access on surface water bodies are avoided, remedied or mitigated.*

Assessment: The proposal seeks to exclude stock from waterbodies and retire land from grazing, and this will reduce associated erosion and sediment loss to receiving waterbodies.

3.12 Discharges to land and water

Objective O36: *The runoff or leaching of contaminants to water from discharges to land is minimised, including to assist with achieving the outcomes and indicators of desired environmental states for water in Tables 3.1 to 3.8.*

Objective O37: *The amount of sediment-laden runoff entering water is reduced minimised, including to assist with achieving the outcomes and indicators of desired environmental states for water in Tables 3.1 to 3.8.*

Objective O38: *The adverse quality and quantity effects of stormwater discharges from the stormwater networks and urban land uses are improved over time.*

Assessment: The Proposal is consistent with these objectives for the following reasons:

- The proposed treatment train approach aligns with these objectives;
- The Applicant proposes to use a number of measures as detailed in the Infrastructure Design Report (**Appendix 16**) to limit the amount of sediment laden water discharging to water to avoid adversely affecting the receiving environment and aquatic ecology;

- The sediment and stormwater discharges will be minimised through the use of erosion and sediment control measures, and WSUD measures. Conditions of consent will ensure these measures are adhered to during works, and upon completion of the development with respect to the operational stormwater; and

- The Proposal will achieve hydraulic neutrality and stormwater is controlled to avoid adverse effects from run-off.

> ***Policy P65:*** *National Policy Statement for Freshwater Management requirements for discharge permits. When considering any application for a discharge consent the consent authority shall have regard to the following matters:*
>
> *(a) the extent to which the discharge would avoid contamination that will have an adverse effect on the life-supporting capacity of fresh water including on any ecosystem associated with fresh water, and*
> *(b) the extent to which it is feasible and dependable that any more than minor adverse effects on fresh water, and on any ecosystem associated with fresh water, resulting from the discharge would be avoided, and*
> *(c) the extent to which the discharge would avoid contamination that will have an adverse effect on the health of people and communities as affected by their contact with fresh water, and*
> *(d) the extent to which it is feasible and dependable that any more than minor adverse effects on the health of people and communities as affected by their contact with fresh water resulting from the discharge would be avoided.*
>
> *This policy applies to the following discharges (including a diffuse discharge by any person or animal):*
>
> *(a) a new discharge, or*
> *(b) a change or increase in any discharge*
> *of any contaminant into fresh water, or onto or into land in circumstances that may result in that contaminant (or, as a result of any **natural process** from the discharge of that contaminant, any other contaminant) entering fresh water.*

The Proposal is consistent with Policy P65 for the following reasons:

- Adverse effects on water quality associated with sediment discharges have been assessed to be less than minor. Further there will be positive effects from the retirement of farming activities and extensive planting of the site. Any adverse effects experienced will be temporary and less than minor in nature, as earthworks will be limited in extent and well contained, and a range of erosion and sediment control measures outlined in the Infrastructure Design Report (**Appendix 16**) will be applied;

- The measures outlined in this application and accompanying technical reports, together with the inclusion of appropriate conditions on the regional discharge permits, will ensure that the potential for effects on receiving waters associated with conspicuous oil or grease films, scums or foams, or floatable or suspended materials or odour both through construction and operation is negligible and highly unlikely; and

- Once completed, stormwater runoff from impervious surfaces will be treated prior to discharging as outlined in the Stormwater Management Plan (**Appendix 18**).

Policy P66*: Minimising discharges to water or land*
Discharges of contaminants to water or land will be minimised through the following hierarchy:

(a) avoiding the production of the contaminant,
(b) reducing the amount of contaminants, including by reusing, recovering or recycling contaminants,
(c) minimising the volume or amount of the discharge,
(d) discharging to land is promoted over discharging direct to water, including using land-based treatment, constructed wetlands or other systems to treat contaminants prior to discharge.

Policy P83: *Minimising adverse effects of stormwater discharges*
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.

Policy P84: *Managing land use impacts on stormwater Land use, subdivision and development, including stormwater discharges, shall be managed so that runoff volumes and peak flows:*

(a) avoid or minimise scour and erosion of stream beds, banks and coastal margins, and
(b) do not increase cause new or exacerbate existing risk to human health or safety, or increase exacerbate the risk of inundation, erosion or damage to property or infrastructure, including by retaining, as far as practicable, predevelopment hydrological conditions hydrographs and overland flow paths in new subdivision and development.

Discharges of contaminants have been minimised through design and a management regime as outlined Stormwater Management Plan (SMP) which has been prepared to manage both the quantity and quality of stormwater generated by the proposed retirement village development (**Appendix 18**). The stormwater system has been designed in accordance with water-sensitive urban design principles and adopts a treatment-train approach combining bioretention devices, constructed wetlands, attenuation storage and controlled discharge structures.

Overall, the proposed stormwater management approach represents an improvement on the existing highly degraded rural environment. The system provides effective stormwater treatment, runoff attenuation, flood mitigation and ecological enhancement while maintaining downstream hydraulic performance and protecting water quality within the receiving environment. Consequently, adverse operational effects associated with stormwater discharges are expected to be less than minor and, in

several respects, the proposal will result in positive environmental outcomes when compared with the existing site conditions.

Temporary stormwater and sediment-related effects during construction will be managed through a robust erosion and sediment control framework. This includes sediment retention ponds, decanting earth bunds, stabilised accessways, diversion bunds, progressive stabilisation and, where necessary, chemical treatment of sediment-laden runoff. These measures will be implemented through certified management plans and monitored throughout the construction period.

Overall, the Proposal is consistent with these policies.

Kāpiti Coast District Plan

Strategic Direction

DO-O1 Tangata Whenua

To work in partnership with the tangata whenua of the District in order to maintain kaitiakitanga of the District's resources and ensure that decisions affecting the natural environment in the District are made in accordance with the principles of Te Tiriti o Waitangi (Treaty of Waitangi).

Assessment: The Applicant has undertaken pre-lodgement engagement with relevant iwi authorities and other Māori groups, predominantly Te Ātiawa ki Whakarongotai Charitable Trust.

This engagement identified particular mana whenua interests in freshwater, ecological restoration and the management of any archaeological discoveries. Ongoing engagement will enable those interests to continue to inform detailed design, construction and monitoring.

The proposed restoration and enhancement of wetlands, riparian areas and the modified watercourse will support improved freshwater health and biodiversity. These outcomes align with mana whenua aspirations for kaitiakitanga, wai ora and the restoration of degraded waterways expressed through engagement and Te Whaitua o Kāpiti Implementation Programme.

Although no recorded archaeological sites are located within the Site, the wider area has a history of Māori occupation and there remains potential for subsurface material to be encountered. The proposed archaeological authority and accidental discovery procedures will ensure that any archaeological or cultural material discovered during earthworks is appropriately identified and managed.

DO-O2 Ecology and Biodiversity

To improve indigenous biological diversity and ecological resilience through:

1. *protecting areas of significant indigenous vegetation, and significant habitats of indigenous fauna;*
2. *encouraging restoration of the ecological integrity of indigenous ecosystems;*
3. *enhancing the health of terrestrial and aquatic ecosystems; and*
4. *enhancing the mauri of waterbodies.*

Assessment: As outlined in the Ecological Assessment, there are no identified significant indigenous biodiversity values or significant habitats of indigenous fauna. The Ecological Assessment outlines constraints and opportunities with regard to all indigenous biodiversity on site and concludes that there are opportunities to significantly improve degraded habitats on the site. The effects from any reclamation of wetlands required to develop the site that cannot be avoided will be addressed through the consenting process and the effects management hierarchy.

Mana whenua have indicated that they are interested in ensuring that the environmental impacts of the proposal are fully addressed, including any potential effects on waterways, and that there are opportunities to undertake environmental restoration.

Mana whenua are best placed to comment on the current state of mauri and the relative effects of the proposed development. It is likely that the mauri of the site is currently considered to be depleted due to rural land uses taking place which have degraded waterbodies on site. The Proposal seeks to retire land from grazing and undertake significant landscape and riparian planting which will improve biodiversity.

DO-O3 Development Management

To maintain a consolidated urban form within existing urban areas and a limited number of identified growth areas, and to provide for the development of new urban areas where these can be efficiently serviced and integrated with existing townships, delivering:

1. *urban areas which maximise the efficient end use of energy and integration with infrastructure;*

2. *a variety of living and working areas in a manner which reinforces the function and vitality of centres;*

3. *an urban environment that enables more people to live in, and more businesses and community services to be located in, parts of the urban environment:*

    a. *that are in or near a Centre Zone or other area with many employment opportunities; or*

    b. *that are well serviced by existing or planned public or active transport; or*

    c. *where there is high demand for housing or for business land relative to other areas within the urban environment;*

   while accommodating identified qualifying matters that constrain development;

4. *resilient communities where development does not result in an increase in risk to life or severity of damage to property from natural hazard events;*

5. *higher residential densities in locations that are close to centres and public open spaces, with good access to public transport;*

6. *management of development in areas of special character or amenity in a manner that has regard to those special values;*

7. *sustainable natural processes including freshwater systems, areas characterised by the productive potential of the land, ecological integrity, identified landscapes and features, and other places of significant natural amenity;*

8. *an adequate supply of housing and areas for business/employment to meet the needs of the District's anticipated population which is provided at a rate and in a manner that can be sustained within the finite carrying capacity of the District;*

9. *management of the location and effects of potentially incompatible land uses including any interface between such uses; and*

10. *urban environments that support reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.*

DO-O20 Well-functioning Urban Environments

A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

DO-O23 Provision of housing for an aging population

Provide for a diverse range of housing and care options that are suitable for the particular needs and characteristics of older persons in the General Residential Zone and High Density Residential Zone, such as retirement villages.

Assessment: The Proposal is consistent with these objectives. The clauses are addressed as follows:

- The Proposal is supported by an Infrastructure Report. The site can be adequately serviced, and it benefits from existing reticulated three waters infrastructure along Ratanui Road.
- The Proposal provides housing supply in terms of retirement units for an aging population, freeing up homes for younger generations. If the site was to be developed for residential development, this would also be meeting an identified housing demand in the District.
- The Proposal provides multi-modal transport opportunities including active modes and public transport to provide connectivity between the site and community and commercial facilities.
- As outlined in the Infrastructure Report, the future impacts of climate change have been considered. The site is able to address natural hazard risks such as flooding, including the predicted impacts of climate change such as increased rainfall intensity, through nature-based solutions such as constructed wetlands. Geotechnical hazards can be addressed through mitigation measures as outlined in the Geotechnical Assessment.
- The density proposed is appropriate considering the surrounding General Residential Zone density.
- There are no areas of special character or amenity identified.
- The biophysical context of the site has been considered, with management approaches available for constraints and opportunities identified to achieve net positive environmental outcomes.
- The supporting assessment has shown that the economic benefits of the Proposal significantly outweigh the economic benefits of retaining the existing rural activities. Residential use of the

site subject to the structure plan would provide housing supply to meet an identified need, as well as the enablement of retirement units which is a typology in demand for Kāpiti's aging population.

- While this area is in transition from rural to urban character as outlined in Kāpiti's Growth Strategy, the Structure Plan nevertheless recommends mitigation for the rural/urban interface in the form of building setbacks and landscaping which have been applied in the Landscape Plans.
- As outlined in the Transport Assessment, future residents will have multi-modal transport options including access to a nearby bus service and pedestrian and cycle connections to nearby amenities such as open space and commercial and community facilities.

For these reasons, the Proposal is considered to be consistent with DO-O20 with regard to creating a well-functioning urban environment.

The Proposal is consistent with DO-O23 for the reasons listed in respect of DO-O3(2) above.

DO-O4 Coastal Environment

To have a coastal environment where:

1. *areas of outstanding natural character and high natural character, outstanding natural features and landscapes, areas of significant indigenous vegetation, and significant habitats of indigenous fauna are identified and protected;*
2. *areas of outstanding natural character and high natural character are restored where degraded;*
3. *the effects of inappropriate subdivision, use and development are avoided, remedied, or mitigated;*
4. *public access to and along the coast to facilitate active and passive recreational use is maintained and enhanced while managing inappropriate vehicle access; and*
5. *Inappropriate development does not result in further loss of coastal dunes in the area mapped as the coastal environment.*

Assessment: The site is within the mapped coastal environment which covers the entire Paraparaumu urban area. As noted in the effects assessment in Section 15 of the Application, the residential development of the site will have a negligible effect on coastal character values considering there is little notable coastal character remaining on the site. The redevelopment of the site will enable the restoration of degraded habitats, and planting will include eco-sourced species suited to this coastal environment, in combination with the restoration of wetland areas which will restore some aspects of natural character.

DO-O5 Natural Hazards

To ensure the safety and resilience of people and communities by avoiding exposure to increased levels of risk from natural hazards, while recognising the importance of natural processes and systems.

Assessment: As outlined in the Infrastructure Report, the future impacts of climate change have been considered. The site is able to address natural hazard risks such as flooding, including the predicted impacts of climate change such as increased rainfall intensity, through nature-based solutions such as constructed wetlands. Geotechnical hazards can be addressed through mitigation measures as outlined in the Geotechnical Assessment.

DO-O6 Rural Productivity

To sustain the productive potential of land in the District, including:

1. *retaining land which is suitable for a range of primary production activities;*
2. *achieving added economic and social value derived from primary production activities through ancillary on-site processing and marketing;*
3. *enabling activities that utilise the productive potential of the land in the rural environment;*
4. *reducing conflict between land uses in the rural environment and adjoining areas; and*
5. *avoiding, remedying or mitigating adverse effects on the efficient operation of existing primary production activities from sensitive activities establishing on adjoining subject sites;*
6. *while safeguarding the life-supporting capacity of air, water, soil, and ecosystems by avoiding, remedying or mitigating adverse effects on the environment.*

Assessment: It is concluded that the residential development of the Site would have a less than minor effect on the productive rural land resource of the Kāpiti Coast District. This is due to:

- As outlined above, the Economic Assessment provided in **Appendix 15** finds that the site has limited soils of a highly productive nature, further, the site is used for rural lifestyle living rather than for primary production.
- The property is a small landholding and as such only supports lifestyle farming rather than productive or intensive agriculture.
- The site has a small section of highly productive land, however as outlined in Section 4.3, the NPS-HPL only relates to land zoned general rural or rural productive. Sites zoned General Residential do not meet the NPS-HPL definition of being highly productive.

DO-O7 Historic Heritage

To protect historic heritage in the District for the social, cultural and economic wellbeing of the Kāpiti Coast community and future generations, including:

1. *supporting the contribution of historic heritage features and their values to the identity, character and amenity of places and landscapes;*

2. *recognising and protecting tangata whenua historic heritage, including Waahi Tapu and Other Places and Areas Significant to Māori; and*
3. *providing for appropriate use and development of natural and physical resources with historic heritage values, while ensuring any adverse environmental effects are avoided, remedied or mitigated*

Assessment: An Archaeological Assessment has been undertaken for the site which is attached as **Appendix 23**. No archaeological sites have been identified in the project area. However, based on the findings of this assessment, it is considered that there is potential for unrecorded subsurface remains, particularly in the form of midden/oven and possibly as isolated artefact finds associated with Māori occupation and settlement to be present.

Where it is not possible to avoid adverse effects on archaeological values, an Archaeological Authority is sought under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) to provide a means of managing adverse effects on archaeological values and recovering data from the affected sites.

With these measures in place, the Proposal is consistent with this objective.

DO-O8 Strong Communities

To support a cohesive and inclusive community where people:

1. *have easy access and connectivity to quality and attractive public places and local social and community services and facilities;*
2. *have increased access to locally produced food, energy and other products and resources;*
3. *have improved health outcomes through opportunities for active living or access to health services; and*
4. *have a strong sense of safety and security in public and private spaces.*

Assessment: The Proposal provides multi-modal transport opportunities including active modes and public transport to provide connectivity between the site and community and commercial facilities. The Proposal would lead to improved health outcomes as an important element of retirement villages is the provision of on-site healthcare for the elderly. In addition, the provision of housing, healthcare, recreation, and other facilities on site will meet residents' daily needs.

DO-O9 Landscapes, Features and Landforms

To protect the District's identified outstanding natural features and landscapes from inappropriate subdivision, use and development; and

1. *maintain or enhance the landscape values of special amenity landscapes and identified significant landforms; and*

2. *avoid, remedy or mitigate adverse effects of earthworks on natural features and landforms.*

Assessment: While there are no outstanding natural features and landscapes or special amenity landscapes, the potential effects associated with landscape values is provided in section 15 of the Application. Overall, effects on landscapes are assessed as being low-moderate in the LVEA (minor in RMA terms) which is an acknowledged and a consequential aspect of the change of use that is proposed (i.e. a change from rural to residential land use). However, the transitional effects of the change will reduce over time as noted by the Landscape and Visual Assessment, and residual adverse effects can be appropriately addressed through the consenting process including with recommendations as outlined in the assessment.

DO-O10 Contaminated Land

To prevent or mitigate any adverse environmental effects, including risks to human health and the environment, arising from past, present or future activities involving contaminated land.

Assessment: While there are known contamination issues on site, these effects can be addressed through proposed conditions of consent, including a Contaminated Sites Management Plan and Remediation Plan.

DO-O11 Character and Amenity Values

To recognise the unique character and amenity values of the District's distinct communities, while providing for character and amenity values to develop and change over time in response to the diverse and changing needs of people, communities and future generations, resulting in:

1. *residential areas characterised by the presence of mature vegetation, a variety of built forms and building densities, the retention of landforms, and the recognition of unique community identities;*
2. *vibrant, lively metropolitan and town centres supported by higher density residential and mixed use areas;*
3. *local centres, village communities and employment areas characterised by high levels of amenity, accessibility and convenience;*
4. *productive rural areas, characterised by openness, natural landforms, areas and corridors of indigenous vegetation, and primary production activities; and*
5. *well managed interfaces between different types of land use areas (e.g. between living, working and rural areas) and between potentially conflicting land uses, so as to minimise adverse effects*

Assessment: The Proposal would result in a change of character of the site from rural to urban/residential. While this will not appeal to all members of the local community, this transition has been signalled through the Council's Urban Growth Strategy and the rezoning of the Site through Plan Change 4. DO-O11 acknowledges that character and amenity values change over time. The proposal

will otherwise provide a variety of built forms and building densities (villas, cottages, townhouses, serviced apartments and other facilities), as well as mature vegetation in time through extensive landscaping.

DO-O12 Housing Choice and Affordability

To meet diverse community needs by increasing the amount of housing that:

1. *is of densities, locations, types, attributes, size and tenure that meets the social and economic wellbeing needs of households in suitable urban and rural locations;*
2. *is affordable and adequate for lower income households; and*
3. *can respond to the changing needs of residents, regardless of age, mobility, health or lifestyle preference;*
4. *while enhancing the amenity of living environments and contributing to the sustainability of communities and compatibility with the goals of environmental sustainability, in particular resource, water and energy efficiency.*

Assessment: The supporting assessment has shown that the economic benefits of the Proposal significantly outweigh the economic benefits of retaining the existing rural activities. The development of the site would provide housing supply to meet an identified need, as well as the enablement of retirement units which is a typology in demand for Kāpiti's aging population.

Ratanui Development Area

DEV3-P1 Subdivision, Use and Development

Enable retirement villages and residential activities and subdivision in DEV3 – Ratanui Development Area where it is undertaken in general accordance with DEV3 – Figure 1: Ratanui Development Area Structure Plan, including:

1. *providing site access via a T-intersection with a right turn bay in the area indicated in the Structure Plan;*
2. *providing access to adjacent sites where residential subdivision and development is proposed;*
3. *providing water supply, wastewater and stormwater drainage systems, and underground power and telecommunications which meets the Council's Land Development Minimum Requirements;*
4. *creating a flood storage area in the general area indicated in the DEV3 – Figure 1: Ratanui Development Area that provides for compensatory flood storage for events up to a 1% AEP event (including allowing for sea level rise and increased rainfall intensity) to mitigate the impacts of the development from removing existing floodplain storage on the Site;*

5. *creating large-centralised wetland areas in locations indicated in the DEV3 – Figure 1: Ratanui Development Area Structure Plan to provide for stormwater management and for offsetting any loss of wetland habitat on the site. The wetland areas will:*
    a. *provide flood storage for events up to a 1% AEP event (including allowing for sea level rise and increased rainfall intensity) to mitigate the stormwater impacts of the development on the downstream catchment;*
    b. *provide stormwater treatment outcomes in accordance with Council's Land Development Minimum Requirements 2022;*
    c. *provide for the offsetting of wetland loss elsewhere on the site by creating offset wetlands within the centralised wetland area(s) where:*
        i. *the primary function of the offset areas is to create natural inland wetlands;*
        ii. *the secondary function of offset areas is to provide flood storage and stormwater treatment functions;*
        iii. *the offset areas are established and managed to ensure at least a net gain in indigenous biodiversity outcomes;*
        iv. *the offset areas within the wetlands are clearly identified in plans and will exclude first flush areas designed to be cleaned out when sediment builds up;*
6. *ensuring that development within the Site occurs in such a way that landscape and visual effects are managed, the development is sensitively integrated into the surrounding landscape, and an attractive and biodiverse planting structure is created for the Site including:*
    a. *appropriate street tree and amenity planting, including riparian planting along the highly modified stream;*
    b. *planting species and arrangements reflecting predominantly indigenous species which are typical of the coastal area and naturally occurring in the local area, as well as appropriate exotic amenity plantings;*
    c. *boundary treatments around the entire perimeter of the development site, including landscaping, planting, fencing and/or earthbunds, as appropriate, that:*
        i. *ensure integration between the new development and adjacent sites and the wider landform to soften the transition from a residential to rural lifestyle land use;*
        ii. *take into account the topographical physical constraints of the site, the sensitivity of the interface, and the scale of development in proximity to the interface;*
        iii. *are of sufficient width to achieve (i) and (ii) above; and*
        iv. *do not apply where access is provided to the Site or adjacent sites.*
    d. *development platforms that are sensitively and effectively integrated into the existing terrain along the edges of the Site, particularly at the northern and eastern edges (retaining walls will be minimised in favour of natural batters and*

consideration will be given to retaining and enhancing natural landforms, where practicable); and

7. *ensuring building foundations are designed to resist liquefaction induced settlement; and*
8. *ensuring any increase in lateral spread hazard and/or effects to neighbouring properties is avoided, including through providing a minimum setback for buildings or other protection or mitigation measures for adjacent property boundaries.*

Assessment: The Proposal is generally consistent with this policy, the above clauses are addressed in turn:

- Clause (1): site access is provided via a T-intersection with a right turn bay, this is in a slightly different location but still in the same general area and therefore is in general accordance with the Structure Plan.
- Clause (2): This clause is not applicable as no residential subdivision and development is proposed. The intent of this clause was to require additional access in the event the land was developed for a standard residential development instead of the retirement village proposed through Plan Change 4.
- Clause (3): Services as proposed consistent with Council's Land Development Minimum Requirements.
- Clause (4): The proposal provides for attenuation of flood waters up to a 1% AEP event including allowing for sea level rise and increased rainfall intensity. These areas are not in the general location shown on the eastern boundary of the property. The proposal is nonetheless in accordance with the intent of this policy, as it manages flooding effects off site and ensures the development is hydraulically neutral as outlined in the SMP (**Appendix 18**).
- Clause (5): The proposal is consistent with this clause, as stormwater treatment and offsetting wetlands are provided in the areas indicated in the Structure Plan and:
- They provide flood storage for events up to a 1% AEP event including allowing for sea level rise and increased rainfall intensity
- Stormwater treatment achieves outcomes in accordance with the Council's Land Development Minimum Requirements 2022;
- The centralised wetlands provide for offsetting wetland loss elsewhere on site and achieve a net gain in indigenous biodiversity outcomes. The primary function of these wetlands is ecological, with stormwater treatment devices provided upstream in the treatment train that can be actively managed as first flush areas designed to be cleaned out when sediment builds up.
- Clause (6): The proposal is consistent with this clause as outlined in the LVEA (**Appendix 9**) which finds that the proposal achieves the broader intent of the DEV3 provisions through the provision of a coordinated urban form, landscape integration, extensive planting, retention

and enhancement of key landscape features, and the establishment of a coherent transition to adjoining land uses[1].

- Clause (7): Building foundations designed to resist liquefaction induced settlement as outlined in the Geotechnical Assessment (**Appendix 21**).
- Clause (8): The proposal will avoid increasing lateral spread hazard and/or effects to neighbouring properties as outlined in the Geotechnical Assessment (**Appendix 21**).

General Residential Zone

GRZ-P20 Medium Density Residential Standards – Policy 1

Enable a variety of housing typologies with a mix of densities within the Zone, including 3-storey attached and detached dwellings, and low-rise apartments.

GRZ-P21 Medium Density Residential Standards – Policy 2

Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga).

GRZ-P22 Medium Density Residential Standards – Policy 3

Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.

GRZ-P23 Medium Density Residential Standards – Policy 4

Enable housing to be designed to meet the day-to-day needs of residents.

GRZ-P24 Medium Density Residential Standards – Policy 5

Provide for developments not meeting permitted activity status, while encouraging high-quality developments.

GRZ-P7 Development and Landforms

Subdivision, use and development (including associated driveways) should be sited, designed and undertaken to integrate with the natural topography and landform of the land and to minimise:

1. *the visual impact, bulk and scale of buildings and structures on identified landscape values, ecological sites, geological features or areas of high natural character;*
2. *the extent of cut and fill;*
3. *the need for and the height of retaining walls; and*
4. *the mass of buildings on sloping land, by variations in wall and roof lines and by floor plans which complement the contours of the land.*

[1] Refer page 42.

Assessment: While GRZ-P20 to GRZ-P24 are more focussed on the District Plan itself, the proposal is consistent with these as:

- GRZ-P20 – the proposal provides for an increase in housing supply, including in the aged-care housing typology that is in demand. The development provides for detached, semi-detached and apartment typologies. Further, the development will free up existing residential housing stock for others in the market reducing land demand pressure.
- GRZ-P21 – the proposal largely complies with MDRS standards, with minor non-compliances relating to maximum building height and windows to street, the effects of these have been assessed as being less than minor in Section 15 of the Substantive Application.
- GRZ-P23 – the proposal includes the provision of housing, healthcare, recreation and other facilities within the site which will serve the daily convenience needs of residents.
- GRZ-P24 – as above, the proposal largely complies with MDRS standards, with minor non-compliances relating to maximum building height and windows to street. The proposal is for a high quality retirement village development.
- GRZ-P7 – the largest buildings have been centred in the middle of the site, with extensive landscaping and boundary treatments to mitigate visual effects on adjacent properties. Earthworks have been optimised as outlined in the Infrastructure Design Report (**Appendix 16**).

GRZ-P8 Reverse Sensitivity

New residential subdivision and development will be located away from lawfully established industrial or intensive rural activities, or areas zoned for these activities, to minimise reverse sensitivity effects.

Residential activities (excluding visitor accommodation other than temporary residential rental accommodation) located at the urban-rural interface will be undertaken in a manner which is compatible with the activities undertaken in the Rural Zones.

Assessment: There are no nearby industrial or intensive rural activities that would create reverse sensitivity issues. The site has a rural/urban boundary on several sides. The proposal provides mitigations including building setbacks and landscaping to address this interface consistent with the Structure Plan.

GRZ-P9 Residential Activities (excluding visitor accommodation other than temporary residential rental accommodation)

Residential activities will be recognised and provided for as the principal use in the Residential Zones, while ensuring that the effects of subdivision, use and development is in accordance with the following principles:

1. *adverse effects on natural systems will be avoided, remedied or mitigated;*
2. *new built development will respond to the planned built character of the Zone;*

3. *transport choice, efficiency and accessibility to active or public transport will be maximised;*
4. *housing types which meet the need of households will be provided for;*
5. *the functional and operational requirements of different types of housing are recognised; and*
6. *accessory buildings and buildings which are ancillary to residential activities will be provided for.*

Assessment: The proposal is consistent with this policy as follows:

- Clause (1): Adverse effects on natural systems are avoided, remedied or mitigated, the Ecological Assessment (**Appendix 8**) finds that there will be positive effects for freshwater habitats in terms of a net gain in the quality of aquatic habitat and the amount and quality of natural inland wetland, as well as beneficial supporting land use and controls (stormwater quality protection, riparian protection, removal of farming practices).
- Clause (2): The development is consistent with the built character articulated by DO-O11 as follows: " residential areas characterised by the presence of mature vegetation, a variety of built forms and building densities, the retention of landforms, and the recognition of unique community identities". The proposal will provide a variety of built forms and building densities (villas, cottages, townhouses, serviced apartments and other facilities), as well as mature vegetation in time through extensive landscaping.
- Clause (3): Multi-modal transport connectivity, including pedestrian and cycle paths, which supports accessibility and contributes to the amenity of the area. It will enable people to live in close proximity to the Paraparaumu Metropolitan Centre and its associated facilities and amenities.
- Clause (4): The Proposal will contribute to meeting the District's housing demand as it will provide for an increase in housing supply, including in the aged-care housing typology that is in demand.
- Clause (5): This site was selected as it provides a large contiguous land parcel close to the Paraparaumu Metropolitan Centre and its associated facilities and amenities, and where there is demand for aged-care housing, it therefore is well-suited to the operational needs of a retirement village.
- Clause (6): The proposed development will provide housing, healthcare, recreation and other facilities within the site which will serve the daily convenience needs of residents.

GRZ-P10 Residential Amenity

Subdivision, use and development in the Residential Zones will be required to achieve on-site amenity for residents and neighbours in accordance with the following principles:

1. *building size and footprint will be proportional to the size of the allotment;*
2. *usable and easily accessible private outdoor living spaces will be provided;*
3. *buildings and structures will be designed and located to maximise sunlight access, privacy and amenity for the site and adjoining allotments;*

4. *buildings and structures will be designed and located to respond to the planned built character of the Zone;*
5. *appropriate separation distances will be maintained between buildings;*
6. *yards will be provided to achieve appropriate building setbacks from neighbouring areas, the street and the coast;*
7. *hard and impermeable surfaces will be offset by permeable areas on individual allotments;*
8. *unreasonable and excessive noise, odour, smoke, dust, light, glare and vibration will be avoided;*
9. *non-residential buildings will be of a form and scale which is compatible with the surrounding residential environment; and*
10. *service areas for non-residential activities will be screened, and planting and landscaping will be provided.*

Assessment: The proposal is consistent with this policy as follows:

- Clause (1): The proposed buildings are proportionate to the Site. The master-planned layout distributes built form across the Site and integrates it with internal roads, landscaped open spaces, wetlands and ecological corridors, avoiding an unduly concentrated or visually dominant form of development.
- Clause (2): The retirement units will be provided with usable and readily accessible private outdoor living spaces. These will be complemented by communal landscaped areas, recreation facilities, pedestrian routes and other open spaces available to residents.
- Clause (3): The layout, orientation and separation of buildings will provide appropriate sunlight access, privacy and amenity for residents. Building placement, setbacks, landscaping and boundary treatments will also manage shading, privacy and dominance effects on adjoining allotments.
- Clause (4): The buildings and structures respond appropriately to the planned residential character of the General Residential Zone and the Ratanui Development Area. Although the Proposal will change the Site from a rural to an urban character, that transition is anticipated by the planning framework. The integrated design, range of retirement-unit typologies and comprehensive landscaping will establish a coherent residential character.
- Clause (5): Appropriate separation distances will be maintained between buildings to provide daylight, outlook, privacy, access and usable outdoor space. The spacing and orientation of buildings will also reduce the perception of building bulk and maintain a suitable level of residential amenity.
- Clause (6): Appropriate yards and setbacks will be provided between buildings and adjoining properties, internal streets and sensitive environmental features. These setbacks will be reinforced where appropriate by planting, landscaped margins and open-space areas. The Site is not located on the coast, so a coastal setback is not relevant.
- Clause (7): Hard and impermeable surfaces associated with buildings, roads and parking will be balanced by extensive permeable and planted areas. These include private and communal landscaping, riparian planting, ecological restoration areas, open spaces and constructed

wetlands. The proposed water-sensitive urban design measures will further support infiltration and the management of stormwater runoff.

- Clause (8): The retirement-village activity is not expected to generate unreasonable or excessive operational noise, odour, smoke, dust, light, glare or vibration. Temporary construction effects will be managed through the proposed management plans and consent conditions, including controls relating to construction noise, dust, lighting, vibration, working hours and site practices.
- Clause (9): The proposed healthcare, recreation and community facilities are ancillary to and integrated with the retirement village. Their form, scale and location will be compatible with the surrounding residential environment and will serve residents' day-to-day needs without introducing an inappropriate commercial or industrial character.
- Clause (10): Service, loading, waste-storage and utility areas associated with the non-residential activities will be appropriately located and screened from residents, adjoining properties and publicly visible areas. Comprehensive planting and landscaping will soften the appearance of buildings, screen functional areas and contribute positively to the amenity and character of the development.

Overall, the Proposal will provide a high level of on-site amenity for residents while appropriately managing effects on neighbouring properties and the wider residential environment. It is therefore consistent with GRZ-P10.

GRZ-P11 Residential Streetscape

Development, use and subdivision will enhance the amenity, functionality and safety of the streetscape in the Residential Zones. To achieve a positive relationship between development and the street, development will be undertaken in accordance with the Council's Streetscape Strategy and Guideline:

1. *direct pedestrian access will be provided from the street to the front entrance of the primary residential building, where practicable;*
2. *where practicable, at least one habitable room will be orientated towards the street;*
3. *the safety of road users, including pedestrians and cyclists, will not be adversely affected; and*
4. *on-site vehicle manoeuvring will be provided for rear allotments, allotments with significant sloping driveways and on strategic arterial routes.*

Assessment: While the development differs from a standard residential development, it is designed to have a positive relationship with Ratanui Road including through construction of an attractive entrance, permeable fencing, landscape planting and windows overlooking the street. Appropriate onsite manoeuvring is provided, and the development has a less than minor effect on the efficiency and safety of Ratanui Road as outlined in the Integrated Transport Assessment (**Appendix 12**). The proposal is therefore generally consistent with this policy.

GRZ-P12 Landscaping

Landscaping will be required for non-residential activities and residential development in the Residential Zones to enhance residential amenity, while promoting water conservation and biodiversity and allowing for the natural infiltration of surface waters through permeable treatments. Landscaping will be located and designed in accordance with the following principles:

1. *the visual impact of large buildings will be reduced by appropriate screening and planting;*
2. *service areas, loading areas and outdoor storage areas will be screened;*
3. *on-site outdoor living spaces will be defined and enhanced by landscaping;*
4. *sunlight access and passive surveillance to adjoining areas will not be unreasonably restricted;*
5. *public infrastructure and services will not be damaged or blocked;*
6. *planting of locally indigenous vegetation will be encouraged; and*
7. *permeable surfaces will be provided for the natural infiltration of surface waters.*

Assessment: The proposal is consistent with this policy as follows:

- Clause (1): Landscaping will soften and screen larger healthcare, recreation and community buildings.
- Clause (2): Loading, waste, storage and utility areas will be appropriately located and screened.
- Clause (3): Planting will enhance private and communal outdoor spaces.
- Clause (4): Landscaping will maintain sunlight access and passive surveillance.
- Clause (5): Planting will be coordinated with infrastructure and services to avoid obstruction or damage.
- Clause (6): Locally appropriate indigenous species will enhance wetlands, riparian margins and ecological corridors.
- Clause (7): Extensive planted areas and water-sensitive design will support infiltration and stormwater management.

Overall, the Proposal is consistent with GRZ-P12.

GRZ-P13 Energy Efficiency

Where practicable, development and subdivision in the Residential Zones will be designed to minimise energy consumption by maximising sunlight access, and incorporating passive ventilation. Specifically, development will be undertaken in accordance with the following principles:

1. *good sunlight access should be prioritised to main living areas, habitable rooms (including rooms used for hospital recovery) and the private open space associated with living areas; and*
2. *the potential for natural cross-ventilation will be maximised to enable cooling breezes to reduce internal temperatures in the summer months.*

Assessment: The proposal is consistent with this policy. Building layout and orientation will provide good sunlight access to living areas, habitable rooms and private outdoor spaces. Building design will enable natural airflow and cross-ventilation where practicable.

GRZ-P28 Retirement Villages

Retirement villages will be enabled in the General Residential Zone, through a range of housing and living care options that are suitable for the needs and characteristics of older persons by:

1. *Providing for greater density than other forms of residential development to enable shared spaces, services, amenities and facilities, and affordability and the efficient provision of assisted living and care services;*
2. *Providing for good quality on site amenity, recognising the unique layout, internal amenity and other day-to-day needs of residents as they age;*
3. *Encouraging the scale and design of the retirement village to:*
    a. *be of a high-quality and aligned with the planned urban character;*
    b. *achieve attractive and safe streets and public open spaces, including by providing for passive surveillance;*
4. *Provide an adequate and appropriately located area on site for the management, storage and collection of all waste, recycling and organic waste potentially generated by the development.*

Assessment: The Proposal is consistent with GRZ-P28 for the following reasons:

- Clause (1): The Proposal provides a greater residential density than conventional low-density development, reflecting the operational and functional characteristics of a retirement village. That density enables residents to share landscaped spaces, recreation facilities, healthcare, community amenities and supporting services. The integrated layout will also support the efficient and affordable delivery of assisted-living, hospital and rest-home care.
- Clause (2): The Proposal will provide a high standard of amenity through accessible retirement units, private outdoor living spaces, communal landscaped areas, recreation facilities, pedestrian connections and on-site healthcare and community services. The layout recognises residents' changing mobility, accessibility, safety and care needs as they age and allows day-to-day needs to be met within the village.
- Clause (3): The retirement village will have a coherent, high-quality and comprehensively landscaped design aligned with the planned urban character. Its range of unit typologies, integrated open spaces and ancillary care and community buildings will establish an appropriate residential character. Internal streets, pedestrian routes and communal open spaces will be designed as integrated parts of the village rather than solely as movement corridors. Building frontages, entrances and windows will provide visibility over these areas, supporting passive surveillance. Landscaping, lighting and legible pedestrian connections will further contribute to attractive, accessible and safe spaces.
- Clause (4): Adequate and appropriately located areas will be provided for the storage, management and collection of general waste, recycling and organic waste generated by the retirement village. These facilities will be conveniently accessible for servicing while being

screened and separated from residential units, communal amenity areas, adjoining properties and prominent public-facing locations.

Overall, the Proposal delivers the density, shared services, care options, accessibility and on-site amenity anticipated for retirement villages, while providing a high-quality built and landscaped environment. It is therefore consistent with GRZ-P28.

Transport

TR-P1 Integrated Transport and Urban Form

Development and subdivision will be integrated with and consistent with the transport network hierarchy in TR-Table 7, and undertaken in a manner and at a rate to ensure:

1. *the transport network is capable of serving the projected demand safely and efficiently;*
2. *the location of development is appropriate, including providing for the co-location of compatible developments and land use and transport networks to reduce unnecessary travel;*
3. *travel time and distance to services are minimised for all modes of travel;*
4. *development is consistent with Council's Land Development Minimum Requirements; and*
5. *enhanced community connectivity is achieved, resulting in more efficient travel patterns from the community.*

Assessment: The Proposal is consistent with TR-P1. The retirement village is located within the General Residential Zone and DEV3 Ratanui Development Area, which specifically anticipates residential and retirement village development. The site adjoins existing urban development and is connected to the wider transport network via Ratanui Road. The ITA concludes that the transport network can safely and efficiently accommodate the forecast traffic demand of approximately 1,000 vehicle movements per day. The Proposal integrates land use and transport by providing a range of onsite facilities, including healthcare, care suites, recreation amenities and communal facilities, enabling residents' day-to-day needs to be met within the village and reducing travel demand. Community connectivity is enhanced through pedestrian links, crossing facilities and access to nearby services and amenities

TR-P2 Sustainable Transport and Maximising Mode Choice

Development and subdivision will be integrated with a transport system that offers a wide range of travel mode choices, which connects residents to essential community services, centres and social infrastructure, through:

1. *well-integrated and connected communities;*
2. *development that is conducive to active modes of travel, particularly walkable communities which reduce demand for vehicular travel, particularly by private vehicle;*
3. *land use that is integrated with the transport network;*
4. *improved public transport services to the District;*

5. *travel plans and transport assessments for major traffic activities as part of an application for consent for new developments;*
6. *consistency with the Council's Land Development Minimum Requirements; and*
7. *development that ensures adequate access and space for all modes, including pedestrians, people with mobility problems, cyclists, public transport and private car travel.*

Assessment: The Proposal is generally consistent with TR-P2. The development incorporates a connected internal pedestrian network, low-speed internal streets (15 km/h), cycle parking near the Main Building, and direct pedestrian connections to Ratanui Road. Frontage improvements include a pedestrian refuge crossing and upgraded pathways that improve connections to the surrounding transport network. While public transport access is currently limited, the site remains connected to nearby bus services on Mazengarb Road. A Travel Plan has been prepared to encourage walking, cycling, public transport use and carpooling by staff. The Proposal therefore provides transport choices and supports active transport opportunities while recognising the operational characteristics of a retirement village.

TR-P4 Effects of Transport on Land Use/Development

The potential adverse effects of development, operation, maintenance and upgrading of the transport network on land use and development will be avoided, remedied or mitigated by:

1. *ensuring that new habitable buildings and future noise sensitive activities within close proximity to roads identified as a transportation noise effect route and the rail corridor as identified on the District Plan Maps are protected from the adverse effects of road traffic and rail noise;*
2. *avoiding the significant adverse effects of earthworks associated with the transport network;*
3. *ensuring that development of the transport network will:*
    a. *minimise degradation of amenity values;*
    b. *avoid unacceptable levels of noise and vibration, including from strategic arterial routes;*
    c. *minimise disruption or destruction of plant and wildlife habitats;*
    d. *seek to avoid adverse effects on historic heritage, and where avoidance is not practicable, any adverse effects are remedied or mitigated;*
    e. *minimise community severance and other social effects;*
    f. *minimise loss of productive land and loss of private property;*
    g. *minimise pollution of water resources (e.g., stormwater quality and quantity, increased siltation of waterbodies due to road construction, disruption of waterbodies through the use of culverts and piping which can affect fish migration);*
    h. *avoid unacceptable levels of emissions to air; and*
    i. *minimise adverse effects on pedestrian and cyclist safety and amenity including availability and safety of walkways, footpaths, cycle lanes, tracks, level and impacts of weather protection (including shade).*

Assessment: The Proposal is consistent with TR-P4. The transport infrastructure has been designed to avoid or mitigate adverse effects on surrounding land uses. The proposed access intersection, internal

road layout and frontage improvements have been assessed as providing a safe and efficient outcome for all users. The development includes stormwater treatment and water-sensitive urban design measures that minimise potential transport-related effects on water quality. The proposal also includes enhanced pedestrian facilities and crossing opportunities that improve safety and accessibility. The ITA concludes that the access arrangement will have negligible adverse effects on vehicle or pedestrian safety and will not adversely affect nearby properties or the operation of the surrounding road network.

TR-P5 Effects of Land use on Transport

The potential adverse effects on the transport network from development and subdivision will be avoided, remedied or mitigated by identifying both the key existing transport routes and proposed transport routes likely to be required long term as part of the District's transport network and having regard to these when considering applications for subdivision or development.

Assessment: The Proposal is consistent with TR-P5. Transport effects have been assessed through the ITA, which confirms that the retirement village generates significantly fewer traffic movements than the residential development scenario assessed through Plan Change 4. The wider network effects, including future growth, were assessed through that process and accepted by Council. The proposed access arrangement accords with the intent of the DEV3 Structure Plan and integrates with the existing hierarchy of transport routes. The Proposal therefore appropriately recognises existing and planned transport infrastructure and does not result in adverse effects on the safe or efficient operation of the transport network.

TR-P6 Safety

The safety of all transport users will be enhanced during the development, operation, maintenance and upgrading of the transport network, by:

1. *implementing the principles set out in Appendix 6 - Crime Prevention Through Environmental Design (CPTED) Guidelines;*
2. *requiring that all developments provide for safe vehicular and pedestrian access, and have adequate visibility (sight lines);*
3. *requiring all developments to have safe connections to the wider transport network; and*
4. *requiring adequate visibility and sight lines for level crossings.*

Assessment: The Proposal is consistent with TR-P6. Safe vehicular and pedestrian access is provided via the proposed T-intersection with right-turn bay, pedestrian refuge crossing, formal footpath connections and low-speed internal road environment. The ITA concludes that the access location provides good visibility in both directions, appropriate separation from the nearby preschool access, and accommodates service and emergency vehicles safely. The internal road network incorporates traffic calming and a 15 km/h operating environment that supports safe movement by pedestrians, mobility scooter users and cyclists. Safe System Audits are proposed through consent conditions to provide further review of the detailed design and completed works.

TR-P7 Cycling, Walking and Bridleway Links and Safety

Subdivision, use and development will be as far as practicable, located and designed to make walking, cycling and the use of bridleways safer, more enjoyable and convenient in accordance with the Crime Prevention Through Environmental Design (CPTED) Guidelines set out in Appendix 6 and the following principles:

1. *new street linkages will provide safe pedestrian access to shops and services and public transport nodes;*
2. *subdivision and development will:*
    a. *enable cycle and pedestrian routes, both on and off road, which offer good continuity;*
    b. *avoid large blocks that severe connectivity; and*
    c. *consider opportunities to provide bridleways in suitable locations; and*
3. *development will provide for convenient cycle parking facilities in centres; and*
4. *pedestrian and cycle routes will have well designed and built facilities including surface conditions, lighting, signage and passive surveillance from adjacent development.*

Assessment: The Proposal is generally consistent with TR-P7. A comprehensive internal footpath network connects residential units, the Main Building and communal amenities. Frontage improvements include a pedestrian refuge crossing and upgraded shared path connections on Ratanui Road. The internal road network is designed as a low-speed environment where cyclists can safely operate alongside vehicles. The development avoids creating large disconnected blocks and provides strong pedestrian connectivity throughout the village. Bicycle parking is proposed adjacent to the Main Building, while residents can store bicycles within garages. The overall design supports safe, convenient and attractive walking and cycling opportunities consistent with CPTED principles and the intent of the policy.

TR-PARK-P8A Cycle Parking

All new subdivision and development shall provide for safe, sufficient, and appropriately located on-site cycle parking facilities.

Assessment: The Proposal generally supports the intent of TR-PARK-P8A by providing dedicated bicycle parking adjacent to the Main Building together with bicycle storage opportunities within resident garages. While the Proposal does not fully comply with the District Plan cycle parking requirements when assessed against multi-unit residential standards, the ITA concludes that the non-compliance is largely technical given the unique nature of a private retirement village. Residents can securely store bicycles within garages and visitor cycling demand is expected to be low and dispersed throughout the village. The proposed provision therefore adequately accommodates practical cycle parking needs without generating adverse transport effects.

Contaminated Land

CL-P1 Identify Contaminated and Potentially Contaminated Land

Contaminated and potentially contaminated land will be identified, including through the resource consent or plan change processes, to enable the land to be managed or remediated to eliminate any unacceptable risk to the environment.

CL-P2 Criteria for Identification

Contaminated and potentially contaminated land will be identified where land was used, is presently used, or is likely to have been used for an activity appearing on the Hazardous Activities and Industries List; including having regard to whether the land is identified as contaminated in the information held by the Kapiti Coast District Council or in the Wellington Regional Council's SLUR database.

CL-P3 Subject site Investigations

Subject site investigations of contaminated land should be carried out in accordance with national best practice, including the Ministry for the Environment's Contaminated Land Management Guidelines No.1 to No. 5.

CL-P4 Management or Remediation

Any development, subdivision or change in land use on contaminated or potentially contaminated land, that is reasonably likely to increase the risk of exposing people or the environment to contaminants, will eliminate any unacceptable risk to the environment by management or remediation of the contaminated land.

CL-P5 Ensure Fit for Use

The remediation and on-going management of contaminated or potentially contaminated land will be undertaken in a manner that is appropriate for any likely future use of that land.

Assessment: The Proposal is consistent with these policies as follows:

- **CL-P1 and CL-P2:** The potentially contaminated areas and contaminants of concern have been identified through a DSI, informed by the Site's historical uses and available contaminated-land information. This provides an appropriate basis for managing the identified and potentially affected soils through the consent process.
- **CL-P3:** The ENGEO DSI was prepared by a suitably qualified and experienced practitioner and provides site sampling, laboratory analysis and risk assessment. The proposed conditions also require the CSMP and completion reporting to be prepared by a suitably qualified and experienced practitioner in accordance with the Ministry for the Environment's contaminated-land guidance. The Proposal is therefore consistent with the requirement for investigation in accordance with national best practice.
- **CL-P4:** The proposed conditions require a certified CSMP before earthworks commence. It must address handling, storage and disposal of contaminated material, validation testing, unexpected contamination, worker and public health, dust, stormwater run-on and run-off, and the removal or management of affected soil. Earthworks in potentially contaminated areas must follow that plan, contaminated soil taken off-site must go to an authorised facility, and

project records must be retained. These controls will manage exposure and discharge pathways and eliminate unacceptable risks to people and the environment.

- **CL-P5:** The proposed retirement-village use is sensitive residential and aged-care development. Validation testing and a Summary of Works Report prepared by a suitably qualified and experienced practitioner will document contaminated-soil excavations, contamination encountered, validation results, disposal records and imported fill. These requirements will demonstrate that the completed Site is suitable for its intended use and that any residual contamination is appropriately managed.

Overall, subject to implementation of the proposed conditions in **Appendix 7**, the Proposal is consistent with CL-P1 to CL-P5. The identified contamination is localised and can be appropriately managed during earthworks so that risks to human health and the environment are acceptable and the Site is fit for its intended use.

Natural Hazards

NH-P2 Risk Based Approach

A risk based, all hazards approach will be taken to subdivision, land use, and development within areas subject to the following natural hazards:

1. *flood hazards;*
2. *earthquake hazards; and*
3. *fire hazards.*

Hazard categories will be developed for flood and seismic hazards to guide decision making and help minimise potential harm to people and damage to property due to these hazards, while allowing appropriate use.

NH-P3 Managing Activities in Natural Hazard Prone Areas

In areas identified on the District Plan Maps, new subdivision, use and development will be managed in a way that avoids increasing risks from natural hazards. Subdivision, use and development will be allowed only where it can be shown that any potential increase in risk exposure on or beyond the land itself has been avoided, remedied or mitigated.

NH-P4 Precautionary Approach

A precautionary approach will be taken to the management of risks from hazards that may impact on subdivision, use and development, where there is uncertainty about the potential effects and where the effects are potentially significantly adverse.

NH-P5 Protect via Natural Buffers

Natural features that have the effect of reducing hazard risk by buffering development from the effects of natural hazards will be protected through:

1. *development controls, including the use of minimum setbacks, from rivers and streams for new and relocated buildings (excluding minor buildings); and*
2. *undertaking and encouraging restoration of such natural features.*

Assessment: The Proposal is generally consistent with the Natural Hazards policies as follows:

- NH-P2 - A risk-based approach has been applied to both flood and geotechnical hazards. Detailed specialist investigations have been undertaken through the Flood Risk Assessment (Appendix 19) and Geotechnical Investigation (Appendix 21) to identify site-specific hazard risks, assess their likelihood and consequences, and inform the design of the development. The assessments identify flooding, liquefaction, lateral spreading, localised slope instability and earthquake shaking as the primary natural hazards relevant to the Site. The proposed development incorporates mitigation measures that are proportionate to the level of risk identified, consistent with the policy's all-hazards approach.
- NH-P3 - The Site contains mapped Flood Hazard - Stream Corridor and Flood Hazard - Ponding Area overlays. The proposed development has been designed to avoid increasing natural hazard risk both on and beyond the Site. Detailed hydraulic modelling demonstrates that the stormwater management system achieves the practical intent of hydraulic neutrality and does not materially increase downstream flood levels or flood hazard risk. Constructed wetlands, attenuation areas and controlled discharge structures provide compensatory flood storage and flood attenuation. The geotechnical design approach similarly ensures that development will not increase geotechnical hazard risk to adjoining properties, including through management of liquefaction and lateral spreading risks. Accordingly, any increase in risk exposure has been avoided, remedied or mitigated.
- NH-P4 - The Proposal has adopted a precautionary approach through the commissioning of detailed technical investigations and the incorporation of conservative engineering design assumptions. The flood modelling includes climate change allowances and assesses a 1% AEP event with future rainfall intensity projections. The geotechnical assessment adopts conservative assumptions regarding ground conditions, groundwater levels and seismic performance. Where uncertainty exists, detailed design, certification, monitoring and adaptive management measures are proposed through conditions of consent.
- NH-P5 - The Proposal positively responds to this policy through the retention and enhancement of natural hazard buffers. The centralised wetlands and restored riparian corridors provide flood attenuation, stormwater treatment and ecological benefits while assisting in the management of flood hazards. The proposal also retains the existing stream corridor and incorporates extensive ecological restoration and indigenous planting. These features provide a nature-based approach to natural hazard management and improve the resilience of the Site to future flood events and climate change effects.

Overall, the Proposal has been designed having regard to the identified natural hazard constraints of the Site and incorporates appropriate avoidance, mitigation and resilience measures. The development will not create or exacerbate natural hazard risks on surrounding properties and therefore is consistent with NH-P2 to NH-P5.

Coastal Environment

CE-P3 Preservation of Natural Character

Preserve natural character in the coastal environment, and protect it from inappropriate subdivision, use and development, including by:

1. *avoiding adverse effects of activities on natural character in areas of outstanding natural character;*
2. *avoiding significant adverse effects, and avoiding, remedying or mitigating other adverse effects of activities on natural character in all other areas of the coastal environment;*
3. *reinstating dunes which function as natural buffers where practicable;*
4. *providing managed public access ways to the beach and foreshore and limiting damage to dunes from unmanaged access;*
5. *regulating encroachment of permanent structures and private uses onto the beach or public land;*
6. *removing existing unnecessary structures and associated waste materials from the beach; and*
7. *retaining a natural beach and foreshore including a dry sand beach where practicable.*

Explanation

This policy is to give effect to the NZCPS 2010 and the WRPS.

Assessment: The Proposal is generally consistent with CE-P3. The Site is located within the Coastal Environment overlay but is a highly modified landscape that has been subject to grazing, vegetation clearance, drainage works and earthworks, resulting in a relatively low level of natural character. The LVEA concludes that the Site is not identified as an area of outstanding or high natural character and is not an ONFL or SAL. While the Proposal will modify landform, wetland and drainage features, the retention of the northern dune landform, integrated wetland and stormwater design, riparian planting and ecological restoration measures will avoid or mitigate adverse effects on natural character.

CE-P4 Restore Natural Character

Promote restoration of the natural character of the coastal environment where practicable, by:

1. *creating or enhancing indigenous habitats and ecosystems, using local genetic stock;*
2. *encouraging natural regeneration of indigenous species, while effectively managing weed and animal pests;*
3. *rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarshes;*
4. *restoring and protecting riparian and intertidal margins;*
5. *removing redundant coastal structures and materials that do not have heritage or amenity values; or*
6. *redesign of structures that interfere with ecosystem processes.*

Explanation

This policy gives effect to the NZCPS.

Assessment: The Proposal is consistent with CE-P4 as it incorporates a significant programme of ecological restoration and landscape enhancement. The masterplan includes extensive indigenous

planting, riparian restoration, wetland creation and enhancement, restoration of water-related landscape features, and retention of the northern dune landform. The landscape framework will substantially increase vegetation cover across the Site compared to the existing pastoral environment and improve the ecological and landscape expression of watercourses and wetlands. The LVEA concludes that these measures provide opportunities for long-term restoration and enhancement of natural character and ecological values within the Coastal Environment.

CE-P5 Amenity and Public Access

Maintain and enhance amenity values in the coastal environment, such as open space and scenic values, and provide opportunities for recreation and the enjoyment of the coast, including the enjoyment of a high tide dry beach by the public. Public access to and along the coast will be maintained and enhanced while minimising any significant adverse effects on the public's use and enjoyment of the coast.

Assessment: The Proposal is generally consistent with CE-P5. The Site does not currently provide public access and is privately owned. While the retirement village will remain private, the development will provide extensive internal open space, landscaped amenity areas, wetlands, pedestrian connections, boardwalks, seating areas and recreational facilities for residents and visitors. The LVEA concludes that public visibility of the Site is limited and that public visual effects are generally Low adverse or less. The Proposal therefore maintains amenity values while enhancing recreational and landscape amenity within 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.

Assessment: The Proposal is consistent with CE-P7. The northern dune landform is specifically retained within the masterplan and integrated into the landscape framework. The LVEA identifies this dune as one of the more recognisable remnants of the original coastal dune landscape and concludes that its retention will maintain an element of the Site's natural landform character. Native planting is proposed throughout this area to reinforce local coastal landscape character and assist ecological enhancement.

Earthworks

EW-P1 Earthworks

Earthworks activities excluding extractive industries, the removal and replacement of underground storage tanks, and earthworks defined in and regulated by the NESCF will:

1. *be managed to protect geological features identified in Schedule 6 from disturbance; and*
2. *be sympathetically located and of a scale that protects the values of outstanding natural features and landscapes identified in Schedule 4; and*
3. *avoid or mitigate erosion and off-site silt and sediment runoff to the Council's reticulated stormwater system and waterbodies; and*
4. *be managed to ensure adverse effects on natural landforms, residential amenity values and rural character values are remedied or mitigated.*

This policy does not apply to extractive industries, the removal and replacement of underground storage tanks, and earthworks defined in and regulated by the NESCF.

Note: The application of the appropriate recommended treatments from the Wellington Regional Council publications 'Erosion and Sediment Control Guidelines for the Wellington Region' and 'Small Earthworks – Erosion and Sediment Control for Small Sites' is consistent with this Policy.

Assessment: The Proposal is generally consistent with EW-P1. Earthworks are required to establish building platforms, roads, drainage corridors, wetlands and stormwater infrastructure associated with a retirement village anticipated by the General Residential Zone and DEV3 provisions.

The design responds to the Site's dune landforms, drainage features and flood constraints, while retaining the prominent northern dune and integrating stormwater wetlands, riparian planting and landscape restoration within the overall development. A staged earthworks methodology is proposed, with reuse of suitable site-won material where practicable, progressive stabilisation of completed areas, and a comprehensive erosion and sediment control regime including sediment retention ponds, decanting earth bunds, super silt fences, diversion bunds, stabilised construction entrances, monitoring and maintenance.

The Proposal also incorporates measures to protect waterbodies, manage sediment discharges, restore ecological values and integrate development with the surrounding landscape. Accordingly, the scale and nature of the earthworks are appropriate to the planned urban development of the Site and adverse earthworks effects can be appropriately avoided, remedied or mitigated through the proposed design and management measures.

Financial contributions

FC-P1 Provision of Reserves and Public Open Spaces

A financial contribution based on Residential Unit Equivalent (RUE) will be required for all granted land use and subdivision consents and as a requirement for permitted land use activities where it is determined they will increase the demand for reserves and public open spaces within the District and a financial or development contribution has not already been taken for the same development, purpose, and at the same level and intensity of development.

Council will use the contribution for reserves and public open spaces to:

1. *contribute to District-wide facilities, and*
2. *address deficits within the District, and*
3. *undertake improvements to existing reserves and public open spaces.*

The level of financial contribution that is required reflects the demands on and costs of acquiring and improving reserves and public open space are as follows:

1. *the urban RUE value provides for the achievement of Policies UFD-P7 and UFD-P8;*
2. *the Ōtaki urban RUE value, set at 67% of the Urban value, recognises the lower land values compared to the rest of the District; and*

3. *the rural RUE value, set at 50% of the Urban value, recognises that rural areas generally have less need for or immediate access to local and neighbourhood parks.*

Council will apply credits in particular circumstances.

Explanation: The price of the contribution per RUE is based on August 2011 Quotable Value data.

FC-P2 Provision of Infrastructure

A financial contribution may be required for any land use or subdivision application that results in the need to upgrade infrastructure beyond the subject site that the resource consent applies to. The extent and value of any particular financial contribution payable will be in proportion to:

1. *the extent to which the financial contribution avoids, remedies or mitigates any on-site and off-site adverse environmental effects caused by the subdivision, land use or development.*
2. *the extent to which the adverse environmental effects of the subdivision, land use or development are off-set by the positive environmental effects of the type of infrastructure.*
3. *the amount of financial or development contribution already taken for the same development, purpose, and at the same level and intensity of development.*

FC-P3 Financial contributions to offset or compensate for adverse effects

A financial contribution may be required for any land use or subdivision application to ensure positive effects on the environment are achieved to offset any adverse effects that cannot otherwise be avoided, remedied or mitigated.

Assessment: The Proposal is consistent with the financial contributions provisions of the District Plan. The retirement village will generate demand on public infrastructure and services associated with urban development; however, the Applicant will pay any financial contributions required by the District Plan and any conditions of consent. Payment of those contributions will ensure the Proposal appropriately contributes towards the funding of infrastructure, services and facilities required to support growth and mitigate the effects of development. Accordingly, the Proposal is consistent with the intent of the financial contributions framework as any relevant contributions will be met by the Applicant.

Noise

NOISE-P1 Managing Amenity

Noise resulting from land use and development (including fixed plant) will be managed or minimised to achieve an appropriate level of amenity in each zone while acknowledging the primary activities and character in each zone.

NOISE-P2 Noise Sensitive Activities

Community health and welfare will be maintained and enhanced through appropriate noise limits and through avoiding or managing the location of noise sensitive activities close to land zoned, designated or used for noisy activities.

NOISE-P6 Noise Assessment Criteria

In considering resource consent applications for activities which do not meet the permitted noise standards, the Council will have regard to the following matters to determine the appropriateness or otherwise of the proposed activity:

the nature of any measures to reduce noise or mitigate noise levels and the degree to which they are likely to be successful, including:

1. *measures to reduce noise at source including acoustic insulation and enclosure of sources;*
    a. *alternative techniques or machinery which may be available;*
    b. *adequate mounding or screen fencing/walls; and*
    c. *hours of operation;*
2. *the length of time for which specified noise levels will be exceeded, particularly at night, with regard to likely disturbance that may be caused;*
3. *the potential for cumulative noise effects to result in an adverse outcome for receivers of noise;*
4. *the likely adverse impacts of noise generating activities both on and beyond the subject site, on-site visitors, users of business premises, or on public places in the vicinity;*
5. *the extent to which the noise may detract from enjoyment of any recreation or reserve area;*
6. *the level, character, duration, timing, and frequency of noise to be generated and the degree to which this will contrast with the characteristics of the existing noise environment and the impact of any cumulative increase;*
7. *the value and nature of entertainment activities and their benefit to the wider community while having regard to the frequency of noise intrusion and the practicality of mitigating noise, or utilising alternative subject sites; and*
8. *the extent to which achieving the relevant limits is practicable where the existing noise environment is subject to significant noise intrusion from road, rail or air transport activities.*

Assessment: The Proposal is generally consistent with the above noise policies. The acoustic assessment concludes that operational noise associated with the retirement village, including fixed mechanical plant such as fans, condensers, chillers and air handling units, is expected to comply with the applicable ODP noise limits, even when assessed on a conservative worst-case basis. Emergency plant, including a diesel generator and fire pump, is also predicted to comply with the proposed noise limits, with testing restricted to daytime hours.

Construction noise and vibration effects have also been assessed and are capable of being appropriately managed through compliance with NZS 6803:1999 and DIN 4150-3. The assessment

demonstrates that construction activities can achieve compliance through a combination of construction hours, site hoarding, localised acoustic screening where required, equipment setback distances and vibration management measures. A Construction Noise and Vibration Management Plan (CNVMP) is proposed as a condition of consent and will require detailed mitigation measures, monitoring, communication with neighbouring residents, complaint management procedures and implementation of the best practicable option to minimise construction noise and vibration effects. The proposed conditions also impose construction noise and vibration limits, require compliance monitoring and provide for acoustic barriers and other mitigation where necessary. Accordingly, the Proposal appropriately avoids, remedies or mitigates operational and construction noise effects and is consistent with the intent of the District Plan noise policies.

Signs

SIGN-P1 Public Benefit

The public benefit of appropriately designed and located signs will be recognised.

SIGN-P2 Character and Amenity of the Residential and Rural Zones

The type, size, location and design of signs will be managed to protect the landscape, character and amenity values of the Residential and Rural Zones.

SIGN-P3 Character and amenity of the Working Zones

The type, size, location and design of signs will be managed to enable businesses to identify and advertise their business premises while minimising any adverse effects of such signage on the landscape, character and amenity values of the Working Zones.

SIGN-P4 Safety

1. *The traffic safety benefits of appropriately designed and located signs will be recognised; and*
2. *Signs will be designed and located so they do not interfere with the safe and efficient use of roads (including State Highways) and pedestrian/cycle ways.*

SIGN-P5 Sign Assessment Criteria

In considering resource consent applications for activities which do not meet the permitted activity standards for signs, or signs that are not provided for as a restricted discretionary activity under this chapter, the Council shall have regard to the following matters to determine the appropriateness or otherwise of the proposed sign:

Purpose

1. *the primary purpose and any secondary purposes of the sign. For example, to provide information to the community, to give directions, to attract attention, to advertise sponsorship, or private advertising;*
2. *the degree to which the sign(s) relate to activities on the subject site or in a nearby area;*
3. *the extent to which the proposed sign type is needed compared to a sign that complies with the permitted activity standards;*
4. *the extent to which any wider public benefit may result from the sign being displayed;*

Location

1. *the effects of the bulk, location and placement of the sign(s) on a subject site or building, including existing and proposed sign(s);*

Character and Amenity

1. *the proposed location, size, design and content of any proposed sign and its consistency with the character and amenity values of the subject site, adjacent subject sites and the surrounding area;*
2. *the visual dominance and proliferation of the sign(s) and the number of signs already existing on the subject site and on adjacent subject sites;*

Type of sign

1. *the colour, material and reflectivity of the sign(s);*
2. *whether the sign(s) contain any offensive or objectionable material including any conditions of consent required to maintain the content of the sign in this respect;*
3. *whether the sign will or is likely to detract from the character and amenity values of the area;*

Safety

1. *the degree to which the sign(s) may adversely affect traffic and pedestrian/cyclist safety, including sightlines and any potential obstructions or distractions to pedestrians, cyclists and motorists;*
2. *the degree to which the sign(s) may adversely affect aircraft operations at the Kāpiti Coast Airport;*
3. *the degree of effects of the proposed sign(s) on the efficiency of the adjacent and surrounding road network;*
4. *any traffic safety benefits of having the proposed type of sign(s); and*

Cumulative Effects

1. *any cumulative effects relating to any of the above.*

Assessment: Proposed signage includes entry signage and promotional/event signage. The signage is associated with and ancillary to the retirement village development and serves important wayfinding, identification and promotional functions. The entry signage will clearly identify the village entrance and assist residents, visitors, emergency services and service providers in locating the site. Promotional signage will assist with marketing of the village during construction and occupation and will be located

within designated fence bays along the Ratanui Road frontage. These signs are directly related to activities occurring on the site and therefore align with the purpose of the District Plan signage provisions.

The signage has been designed as an integrated component of the entrance and boundary treatment. The primary village signage will be incorporated into entry walls and landscaping and will contribute positively to the identity and sense of arrival of the retirement village. While the signage exceeds the permitted standards for the General Residential Zone in relation to the number of signs and sign dimensions, the signs are proportionate to the scale of the development and are not of a size or design that would dominate the streetscape or detract from the character and amenity values of the surrounding area. The signage will be limited to a small number of locations associated with the main entrance and frontage fencing and will avoid unnecessary proliferation.

In regard to traffic and pedestrian safety, the Integrated Transport Assessment concludes that the proposed signage will not adversely affect the safe and efficient operation of Ratanui Road. The signs will be static, site-specific, oriented parallel to the road corridor, and located clear of the proposed access points and visibility splays. They will not obstruct sightlines for motorists, pedestrians or cyclists and will not contain moving or changing content that could distract road users. Accordingly, any transport effects associated with the signage are assessed as less than minor.

The signage provides a clear public benefit by assisting with wayfinding, identifying the retirement village, and providing information about a significant community facility. The design, scale, placement and appearance of the proposed signs appropriately balance these benefits with the need to protect residential amenity and maintain a safe transport environment. Temporary promotional signage will be removed as construction of the village progresses, with only limited permanent signage remaining following completion of the development.

For these reasons, the Proposal is considered to be generally consistent with SIGN-P1 to SIGN-P5. Any adverse effects on character, amenity or traffic safety will be less than minor and can be appropriately managed through the consent process and conditions controlling the final design, location and illumination of signage.