

Attn: District Planning Team Kāpiti Coast District Council 175 Rimu Road Paraparaumu 503  
district.planning@kapiticoast.govt.nz

<b>To Kāpiti Coast District Council</b> Submission on Proposed Plan Change 4 (Private) to the Operative Kapiti Coast District Plan 2021
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**Submitter details**

<b>Full name of submitter:</b> Paul Anthony Coggan
<b>Contact person (name and designation, if applicable):</b>
<b>Postal address (or alternative method of service under section 352 of the RMA):</b> [REDACTED]
<b>Telephone:</b>
<b>Electronic address for service of submitter (i.e. email):</b> coggan@live.com

I would like my address for service to be my email <i>[select box if applicable]</i>	<input checked="" type="checkbox"/>
I have selected email as my address for service, and I would also like my postal address withheld from being publicly available <i>[select box if applicable]</i>	<input checked="" type="checkbox"/>

Scope of Submission:

The entire scope of the proposed plan change. In particular the area the proposed change covers, Growth sequencing and landscape, Rural Character & Amenity.

Submission: My submission is:

1. This is a submission in opposition to the Private Plan Change request by Welhom Developments Ltd ("the Requestor") to rezone 12.65 ha at 65 & 73 Ratanui Road from Rural Lifestyle Zone to General Residential Zone with a bespoke "Development Area" and Structure Plan for retirement-village or residential development.

I oppose the Plan Change in its entirety and seek that the Council decline it, or substantially amend it.

## 2. Summary of Decision Sought

Decline Plan Change OR, if not declined in full:

Retain the existing Rural Lifestyle zoning on 65 & 73 Ratanui Road.

Defer any rezoning of the Site until: • An area wide (North of Paraparumu to Otihanga) infrastructure capacity study (3 waters, transport, public spaces) is completed and publicly consulted; • A comprehensive landscape, visual, ecological and cultural impact framework has been adopted by Council and a robust Structure Plan prepared with effective buffers, ecological offsets and stormwater treatment;

Alternatively the Council rezone the land south of the site as well so as not to create an island of rural residential land south of the site.

Alternatively that the council consider the rezoning of the entire area running from Paraparumu North/Otaihanga near Otara Park or at least the area bordered by Ratanui and Otihanga road so consideration and planning can be provided for infrastructure needs including transport, 3 waters, public parks etc .

Alternatively if the plan is adopted amendments are made to ensure adequate screening on all boundaries and require a covenant on the site preventing occupants or owners of the site from complaining or taking action about activity in the surrounding zone that are natural aspects of living in a rural lifestyle zone.

## 3. Grounds of Submission

Growth Sequencing and Urban Form • The Site is identified in Te Tupu Pai (2022) as a “Medium-priority greenfield growth area.” Medium priority signals that higher-priority locations (closer to the Metro Centre, rapid-transit stops, and brownfields) should be developed first. This leapfrogs well-serviced land and undermines the District Plan’s compact urban form. • The Plan Change would set an adverse precedent for unsequenced greenfields outside of the Council’s agreed staging framework. The plan would in effect leave a portion of rural lifestyle zoned properties effectively surrounded by General Residential Zone. These properties should, if the plan change is accepted, be included in any rezoning to the General Residential Zone.

On Page 1 of the Welhom Developments Ltd (Welhom) submissions they describe the site as being a logical extension of the adjacent General Residential Zone. This is somewhat misleading, while a small portion of the site is adjacent to a General Residential Zone there is no direct transport (roading, cycle way, footpath, bridleway or other) connection between any area of General Residential Zones and the site. Any residents in the site would need to travel through a portion of a Rural Lifestyle Zone upon leaving the site. Another way of saying this is there is no entrance to the site from the General Residential Zone.

A continuous belt of open spaces is an important part of the distinct plan and this plan change creates a barrier to this.

The rural lifestyle living zone is designed in part to make use of land with lower productivity potential and to provide a remedy to reverse sensitivity. A piecemeal approach to such plonking residential development into this zone risks undermining these goals and creates a precedent for other such developments occurring in a chaotic manner.

Transport Safety and Access • Ratanui Road east of Mazengarb Road has only a narrow carriageway, gravel shared path on the north side and a partial footpath on the south. The proposed new T-intersection and right-turn bay will be adjacent to a speed-limit change point and an existing preschool – increasing crash risk without a funded upgrade package (kerbs, footpaths, crossings, cycle lanes, roundabout). Without a confirmed funding source and timing for upgraded pedestrian/cyclist infrastructure, rezoning will degrade safety for vulnerable road users and lock in a car-dependent location. The Submission acknowledges residents of the proposed zone are unlikely to use public transport

Three-Waters Capacity & Flood Risk • The Site contains a “highly modified” stream and 14 small NPS-FM wetlands (621 m<sup>2</sup> total). Intensification will vastly increase runoff and risk downstream ponding. • The Geotechnical report notes shallow groundwater (2 m bgl), rendering on-lot soakpits unreliable outside the driest months. • No firm commitments have been made for downstream stormwater upgrades or flood-storage compensation to protect existing subdivisions and neighbouring properties – KCDC’s modelling identifies multiple flood hazard overlays across the Site.

Wastewater and Potable-Water Constraints • Peak wastewater loads currently approach network capacity in Paraparaumu. The updated wastewater assessment (Appendix M) merely asserts that “no upgrades are identified” without demonstrating trunk-main or treatment-plant headroom ratings or confirming any developer funding agreement. • Although rainwater tanks are encouraged by KCDC, no rainwater-harvesting requirement is embedded in the Structure Plan, exposing the district’s water supply to new peak demand. A comprehensive consideration of the entire block as delineated by Ratanui and Otaihangā Road becoming residential would allow for a future development to be taken into account.

Landscape, Rural Character & Amenity • The landscape assessment acknowledges that rezoning from Rural Lifestyle to suburban residential incurs at least a Low–Moderate adverse effect on rural character. The assessment provided did not access, or seek to access the affected properties when undertaking its assessment as the belts identified are deciduous old and some may be removed. The impact on site 8 27a Ratanui Road is incomplete, the well mature tree mentioned in the landscape and visual assessment are predominantly deciduous in nature, old and planned for removal. The proposed 2–3-storey walls and roof-heights up to 10 m will loom over remaining lifestyle blocks. The small vegetated buffer strips proposed along some of the edges cannot fully mitigate the sense of enclosure and loss of openness valued by adjoining residents. The proposal should be amended to require a landscaped and planted buffer along the entire perimeter of the site.

Loss of Rural Resource • While the NPS-HPL may not technically apply to Rural Lifestyle zoned land, the Site nevertheless comprises 12.65 ha of free-draining dunes that—if rezoned—can never again contribute to even low-intensity grazing, carbon sequestration, or local food security.

#### 4. Legal and Policy Inconsistencies

Part 2 RMA • Section 6(a) (protecting natural character of wetlands and streams) and Section 7(c) (maintenance of amenity values) are not “provided for” because wetland loss, stream modification, and amenity degradation are inevitable.

National Policy Statements and Standards • NPS-UD Policy 8 requires the Council to be responsive to out-of-sequence rezoning only “even if” beneficial, but only where unconstrained by other matters. Here infrastructure and ecological constraints militate against it.

Regional Policy Statement • PC 1 UD Policy 55(c)4 requires that additional greenfields demonstrate necessity and be sequenced. It is neither after higher priority areas, nor justified by lack of brownfield options.

I seek the following decision from the Kāpiti Coast District Council:

Decline Plan Change OR, if not declined in full:

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Alternatively if the plan is adopted amendments are made to ensure adequate screening on all boundaries and require a covenant on the site preventing occupants or owners of the site from complaining or taking action about activity in the surrounding zone that are natural aspects of living in a rural lifestyle zone.

**Hearing Submissions [select appropriate box]**

I wish to be heard in support of my submission.	<input type="checkbox"/>
I do not wish to be heard in support of my submission.	<input type="checkbox"/>
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	<input checked="" type="checkbox"/>
If others make a similar submission, I will not consider presenting a joint case with them at a hearing.	<input type="checkbox"/>

30/06/2025

\_\_\_\_\_  
Signature of Submitter  
(or person authorised to sign on behalf of submitter)

\_\_\_\_\_  
Date

*A signature is not required if you make your submission by electronic means.*



Paul Coggan <coggan@live.com>

To: Mailbox - District Planning

This sender coggan@live.com is from outside your organization.

You replied to this message on 2/07/2025 9:43 am.



Hi. I am not a trade competitor. And I could not gain a trade advantage. Thanks. Paul.

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**From:** Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>

**Sent:** Tuesday, July 1, 2025 9:17:27 AM

**To:** Paul Coggan <[coggan@live.com](mailto:coggan@live.com)>

**Cc:** Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>

**Subject:** RE: Submission on Proposed Plan Change 4 (Private) to the Operative Kapiti Coast District Plan 2021

Good morning, Paul,

Before I confirm acknowledge receipt of your submission on the Proposed Plan Change 4 (Private)

Could you please reply to my email confirming the "Trade Competition" part on the from 5. (see below)

**Trade Competition [select the appropriate wording]**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ / I could not ☐ gain an advantage in trade competition through this submission.

***If you could gain an advantage in trade competition through this submission, please complete the following:***

I am ☐ / I am not ☐ directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.