Before the Hearings Panel
At Kapiti Coast District Council

Statement of Rebuttal Evidence of Ramesh Valiakulathinkal Narayanapillai (Ramesh Pillai) on behalf Kāpiti Coast District Council (insert area of expertise)

Date: 14 Sep 2026

INTRODUCTION:

1 My full name is Ramesh Valiakulathinkal Narayanapillai (Ramesh Pillai). I am employed by Kāpiti Coast District Council (Council) as Manager Water and Wastewater Services, Te Kaiwhakahaere Ratonga Wai me te Parakaingaki.

2 I prepared a statement of evidence on behalf of the Kāpiti Coast District Council (**Council**) concerning planned water supply upgrades relevant to Proposed Private Plan Change 5 (PPC5), dated 24 August 2026 (my primary evidence).

3 I have read the Statement of Evidence from Mr Nicholas Taylor (Infrastructure and Servicing), filed on behalf of the PPC5 applicant and dated 3 September 2026. This rebuttal statement is intended to provide clarification on matters raised in my primary evidence which have then informed Mr Taylor's conclusions, in relation to water supply matters.

4 My qualifications and experience are set out in my primary evidence at paragraphs 5 and 6. I repeat the confirmation given at paragraph 7 of that evidence that I have read and agree to comply with the Code of Conduct for Expert Witnesses. Where I rely on specialist water or wastewater modelling, I identify that reliance below.

CLARIFICATION OF MODELLING ASSUMPTIONS TO DATE

5 Having reviewed the evidence of Mr Taylor and the potential theoretical yield of 150 dwellings from the PPC5 site, I wish to make clear the assumptions that have formed the basis of the water supply capacity modelling to date, and which informed my earlier Statement of Evidence.

I understand that if rezoned, the plan change application assumes the creation of 50 allotments. With the application of the Medium Density

Residential Standards, where 3 houses per allotment is enabled, the site has a theoretical yield of 150 dwellings.

The current site-specific water assessment assumed 50 dwellings on the PPC5 site. Council's future Zone Management Plan (ZMP) model assumed 70 dwellings. As such, a 150-dwelling scenario has not been assessed.

6 On the current network, more than 50 dwellings cannot be supported without the completion of Loop Main as recommended in ZMP. This Loop Main is the one planned through Nga Manu Reserve Road to connect to the one developer are expected to complete along Te Ara Kawakahia. I have liaised with Ms. Kate Waterland, Council's water network modeller, who has advised that a higher yield under the assessed conditions would result in low pressures in Waikanae Beach (a decrease in level of service) without network upgrades.

7 Without further hydraulic modelling, I cannot confirm that the currently planned and funded upgrades are sufficient for 150 dwellings at this site.

8 This does not establish that 150 dwellings are unserviceable. It establishes that servicing for that yield has not yet been demonstrated. A revised assessment at the resource consent stage would need to test cumulative demand, the timing of other development, pressure and fire-flow performance, and any additional upgrades or staging controls required.

RESPONSE TO MR TAYLOR'S EVIDENCE

9 At paragraph 26 of his evidence, Mr Taylor notes that the Stantec assessment (appended to Ms Waterland's Statement of Evidence) did not model an existing scenario excluding PPC5 and therefore did not isolate PPC5's incremental effect. That limitation does not alter the relevant finding from the assessed cumulative-demand scenario. With recent and committed growth and 50 dwellings at PPC5 included, the

network experiences significant pressure losses and cannot accommodate further growth without mitigation or upgrades. A separate incremental run of the model may assist in apportioning effects, but it would not show that PPC5 can connect while maintaining levels of service.

10 At paragraph 29 of Mr Taylor's evidence, he considers that temporarily opening the DMA boundary and completing the approximately 1.8km trunk main alone will maintain required levels of service for PPC5. Mr Taylor has likely reached this conclusion based on paragraph 19 of my evidence, which could be interpreted that the interconnectivity between the Hemi DMA and Te Moana Road DMA and the 1.8km new trunk main alone would be sufficient to service the PPC5 site. However, these upgrades are required alongside the upgrades set out in paragraph 18 of my primary evidence to provide the additional headroom to support future development. Current capacity and opening the DMA boundary may enable approved development to connect progressively, but completion ahead of the wider Waikanae upgrades may reduce levels of service. The DMA response is an interim solution and the trunk main is one part of a wider programme. Capacity depends on delivery of the wider ZMP scope for the area, including the reservoir, trunk mains and watermain upgrades, as required by cumulative growth.

11 The figures outlined at paragraphs 31 to 34 of Mr Taylor's evidence are from the Water Services Delivery Plan (WSDP) prepared for the Local Water Done Well (LWDW) reform and included into Council's comms with Department of Internal Affairs (DIA), rather than the Long-Term Plan (LTP). As set out in my primary evidence, the approved LTP has approximately $20 million towards upgrades in Waikanae. The 2026-36 LTP is currently being prepared and will consider the WSDP and may include increased funding for the upgrades identified. However, it is important to note the LTP provisions demonstrate planned investment for wider growth, rather than establishing that every potential PPC5 yield is hydraulically serviceable or that all works required for 150 dwellings are identified, designed, consented, programmed and funded.

As I have mentioned above, if the yield is materially greater than 50 dwellings, modelling will be required to determine whether the proposal can meet Council's pressure, demand and firefighting requirements, having regard to cumulative development and the measures available at the proposed connection date.

12 While I agree with Mr Taylor that the Council's ZMP and Development Contributions catchment maps contemplated development on the PPC5 site, as noted above, the Council's ZMP modelling assumes 70 dwellings on the PPC5 site. For this reason, I consider some of Mr Taylor's conclusions may incorrectly indicate the full 150 dwellings on the site is serviceable. This includes:

- Paragraph 51(b), where Mr Taylor concludes that 'potential demand associated with development of the PPC5 site has been contemplated in Council's network planning'. The ZMP assumption was 70 dwellings, and the current modelling assessment by Stantec for private plan change -5 allowed for a maximum of 50 dwellings. A Development Contributions catchment identifies the area to which the relevant policy applies; it is not hydraulic capacity confirmation or a commitment to provide capacity for an unassessed yield at a particular time.

- Paragraphs 60 to 64: I agree that water-supply constraints may be managed through sequencing and infrastructure delivery for the 50-dwelling scenario assessed to date. The same conclusion cannot automatically be extended to 150 dwellings. For that higher yield, the scale and timing of additional works, if any, remain undetermined pending hydraulic assessment.

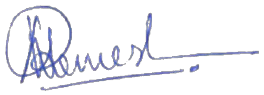
CONCLUSIONS

13 Council's planned and funded programme responds to growth across Waikanae, not solely PPC5. A 150-dwelling demand is outside the site-

specific assumptions currently relied upon. Without modelling, I cannot determine whether it would require local works, acceleration or reprioritisation of planned projects, additional trunk capacity, pressure-management measures or other upgrades, nor confirm timing or cost.

14 However, the absence of a 150-dwelling assessment does not necessarily make rezoning infeasible. I am satisfied that the later resource consent process and detailed design stage will enable full consideration of the servicing capacity of the site. At that stage, Council will retain the ability to decline resource consent, require staged development, or impose consent conditions to manage servicing constraints if adequate capacity and levels of service cannot be demonstrated for the proposed timing of connection.

15 Any proposal above the assessed yield should require an updated Council-approved hydraulic assessment identifying necessary infrastructure, staging and connection timing and confirming that applicable potable-water pressure, demand and firefighting requirements can be met.



Ramesh Pillai Date: 14 Sep 2026