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Via email: susan.jones@mitchelldaysh.co.nz

Attn: Susan Jones, Senior Consultant

**REQUEST FOR FURTHER INFORMATION (RFI):  
PRIVATE PLAN CHANGE REQUEST TO REZONE 100 & 110 TE MOANA ROAD, WAIKANAE**

I have reviewed the request for additional information prepared by Council noting the relevant landscape matters. Please find below my response to each of the matters raised. I have also provided a brief summary of the methodology and method used in the assessment.

#### Definition

The definition of natural character used in this assessment is taken from S9.04 of the Guidelines “Natural Character is an area’s distinctive combination of natural characteristics and qualities, including degree of naturalness.”

This interpretation recognises that S6(a) of the RMA uses the term ‘natural character’ and it is consistent with Objective 2 of the NZCPS, which recognises that the characteristics and qualities that contribute to natural character; and the matters listed in Policy 13(2), incorporates the condition of ‘naturalness’ as one attribute of ‘natural character’.

#### Method

The same principals and approaches apply to assessing natural character as apply to assessing landscape character but with the focus on natural characteristics and qualities<sup>1</sup>. The methodology is to describe the landscapes attributes and interpret how they come together as overall character with respect to context and the purpose of the assessment.

#### Area assessed

The extent of the area assessed is defined as within both the wider area (within 1km of the site) and the closer area is generally the block defined by the Kapiti Expressway, Te Moana Road and Flaxmere Street.

However the broader context is also considered as the site is within the older dune formation processes and interdunal patterns that once dominated this landscape.

#### Wider duneland landscape values

The site is part of the wider Foxton Ecological District<sup>2</sup>, which was previously dominated by shifting dune formation processes and interdunal patterns. There are a few natural areas of sand dune that remain unmodified or undeveloped in the area and are identified in the Kapiti Coast District Plan as either Outstanding Natural Features or Landscapes or Special Amenity Landscapes.

These landscapes are valued for their representativeness of the older dune formations processes, hydrological patterns such as wetland sequences and open dune lakelets and lowland flora and fauna. Perceptual value is

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<sup>1</sup> Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (The Guidelines)

<sup>2</sup> Ecological Values Assessment by RMA Ecology Ltd 2024

also associated with these landscapes due to the established links between the mountains and the sea and undulating topography. These landscapes are largely unmodified with a predominant rural land use and sparse settlement patterns.

#### Abiotic values

When considering the abiotic values of the site within this wider context, the landform is expressive of the older inland dune sequence which form part of the wider dune landforms. It is characterised by undulating topography and is exposed to salt laden winds.

However the site is highly modified with over a century of rural farming practices and more recently a forestry pine plantation. The immediate boundaries are urban with general residential development and the construction of the Kapiti expressway on the south boundary.

The sites hydrological system is also modified, which is not unusual for a peri urban/lowland setting with rural land practices. The wetland and wider QEII site is not included in this assessment as it is already protected by an Open Space covenant. There are no rivers or streams within the site apart from an open channel drain with very low natural character value.

#### Biotic values

The site still supports ecosystems which are of ecological value. The indigenous flora and fauna, although degraded, are part of a wider system of interconnected lakelets and wetlands. However the areas that do have native vegetation are mostly within the protected QEII area.

The natural ecology of the wider site has been heavily modified or removed through historical farming and forestry activities. Most of the vegetation on site is dominated by pasture and exotic plant species. Its current use continues to be grazing and plantation forestry having been harvested recently.

Woody vegetation to the north of the pond does provide habitat and a wider ecological connection value. There are many weeds present along with planted native trees, indicating that the site is not representative of natural regenerating shrubland or natural diversity.

Birdlife is evident in the wetland on site and within the taller woody vegetation areas. Pukekos were also sighted on the lower flats of the site.

#### Perceptual values

When traversing the site, there were no stock units present, nor the typical farming infrastructure such as races, troughs and yards. The sights and sounds of the traffic on the expressway along with the proximity to the surrounding residential units were the dominating encounters. The site experience was therefore peri urban as opposed to rural. The sites open aspect towards the expressway and Te Moana Road also contributed to the populated, urban experience.

The site feels separated from the wider dune formations due to the construction of Te Moana Road, the expressway and the built form of general residential development in the immediate area. The remaining wetland area and indigenous vegetation patterns that thread through the site do however retain the links between the mountains and the sea. The dominant settlement patterns and highly modified rural land use are associated with a low level of perceived naturalness.

Overall, the natural character values of the site are relatively diminished as it is predominantly a highly modified pastoral farmland. The site is within the regions characteristic sand dune formations, however they have been highly modified and do not provide a high natural representation. The perceptual experience was one of a populated urban character adjacent to a busy road and expressway. Therefore the natural character values of the site are considered to be **low**.

1. Please provide a rating for effects on natural character which is separate to the rating for landscape effects, inline with Te Tangi a te Manu, i.e. a rating for effects on the key characteristics and qualities that contribute to the site's coastal natural character.

#### Abiotic effects

The key abiotic values of the site is the sand dune formation that is part of a wider network of undulating sand dunes in the area. However the site is heavily modified with pastoral farming activities as well as forestry. The site is also boarded with urban form including general residential dwellings, infrastructure, Te Moana Road and the Kapiti Expressway.

It is anticipated that the plan change would result in earthworks for the implementation of roading, infrastructure and building platforms. This may cause changes to the dune landform which cause disturbance to the natural topography. However the expected earthworks would be specifically related to residential development purposes. As a result they will be of a similar scale to residential developments within the sites context including the neighbouring residential developments.

The wetland and wider QEII site is not included in this assessment as it is already protected by an Open Space covenant.

#### Biotic effects

The site supports ecosystems that are part of a wider system of interconnected lakelets and wetlands. The wider QEII site is protected and the associated biotic values will be retained within the site. The natural ecology of the wider site has been heavily modified or removed through farming and forestry activities. Most vegetation is pasture and exotic tree species that provide habitat and a wider ecological connection.

The effects of a general residential plan change would lower the biotic value of the site however, the proposed structure plan identifies and retains the mature pohutakawa trees along Te Moana Road as well as provides for landscaping along the Kapiti Expressway boundary. In addition, residential development is also associated with general domestic landscaping and street trees that could benefit ecological habitat and connections.

#### Perceptual effects

The site has been determined as more peri—urban as opposed to rural. Sand dunes are generally not suitable for horticulture and intensive agriculture and the site currently undertakes light grazing for maintenance only. This is partially due to the surrounding urban form of residential development and the Kapiti Expressway. Intensive urban development is also visible from the site including Summerset Waikanae and Ngārara developments.

The resulting residential development from a general residential plan change is therefore likely to be widely understood and accepted. Many people are aware of the need for additional housing, in particular within built up areas with existing infrastructure.

In this regard, any changes in the sand dune topography are likely to be of a similar scale to residential development in the surrounding context. The pastoral landcover and existing vegetation that adds ecological value may be reduced however the structure plan retains mature pohutukawa trees and provides for additional landscaping. The potential addition of street trees and residential vegetation that is often associated with residential developments may replenish lost ecological connections. Furthermore, the QEII area (which provides most of the natural character of the site), is already protected by an Open Space covenant and the associated natural character values will be retained. In summary, the effects of a plan change from general rural to general residential on natural character is considered **low**.

2. Please provide further explanation for the Low (less than minor) adverse rating for landscape effects which take into account natural character effects in the landscape and visual assessment, without the inclusion of the Landscape Development Framework recommended in the landscape and visual assessment.

The proposed structure plan provides an indicative road layout and the possibility for future connectivity. The roading infrastructure works along the general contours of the dune topography minimising disturbance to the existing landforms. It clearly identifies the QEII area and wahi tapu sites that are to remain protected and allows for setbacks. The Framework also specifies the intention to retain the existing pohutakawa trees for amenity and allows for additional landscaping along the Kapiti Expressway.

This structure plan provides strategies to reduce any potential adverse effects rising from a plan change from general rural to general residential. The low (less than minor) level of landscape effects took into account these strategies.

However, the proposed plan change to General Residential, would also provide for the application of Medium Density Residential Standards across the whole site as a permitted activity. If such a development was applied across the steeper more elevated dune formations of the property, it is considered that the level of effects on natural character may increase.

It is somewhat challenging to specifically and tangibly assess landscape effects as the Plan Change will potentially allow earthworks at a relatively unknown scale and layout. However, there are practicalities that provide a reasonable basis for assuming effects, particularly within the landscape values and characteristics that have been identified.

Firstly, earthworks will be specifically related to roading and building platforms. Considering this in terms of landscape values, many people are likely to be forgiving of change given the acceptance of the purpose of the earthworks. As a result, they will be similar in scale to previous and existing residential purposes, and will remain relatively insignificant when considered in the broader scale of the Kapiti Expressway.

Additionally, the works are unlikely to deviate to what is proposed in the structure plan – the setbacks, lot arrangement and infrastructure limitations are understood and an arrangement relative to neighbouring developments is likely to be similar. Configuration of surrounding built form is responsive to the underlying landform that following the general contours and future development arrangements are likely to be similar.

In summary, the landscape effects of the Plan Change are likely to be widely understood and accepted.

If medium density residential standards were applied across the steeper more elevated dune formations of the property, it is considered that the level of effects on natural character may increase towards **low-moderate**. For the purposes of RMA terminology this would still equate to **minor** effects for this proposal. However it is considered that the effect on landscape values of the site as a whole, within its context will have **low** effects.

The further protection of sand dune formations to meet the objectives of the Coastal Environment provisions, was signaling the further provisions available to reduce adverse effects towards very low, as provided in the recommendations.

Megan McBain  
Registered Landscape Architect

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