

APPENDIX 3 to Evidence of Susan Olivia Jones (3 September 2026) - Further Consideration of Relevant Provisions of the Regional Policy Statement Appeals Version September 2025

Table 1 – RPS provisions relating to growth and capacity

Relevant provision of RPS Appeals Version September 2025	Detail of Provisions	Assessment
<i>Policy UD.3: Plan changes that provide for significant development capacity - consideration</i>	<i>For local authorities with jurisdiction over part, or all, of an urban environment, when determining whether a plan change for urban development will be treated as adding significantly to development capacity that is not otherwise enabled in a plan or is not in sequence with planned land release, the following criteria must be met:</i> <i>a) the plan change makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a</i> <i>(i) shortage identified through monitoring or otherwise for</i> <i>(ii) a variety of housing that meets the regional, district, or local shortage of housing in relation to the particular type, size, or format, or</i> <i>(iii) business space or land of a particular size or locational type, or</i> <i>(iv) community, cultural, health, or educational facilities; and</i> <i>b) a plan change will make a significant contribution to a matter in (a) if it:</i> <i>(i) is of high yield relative to either the forecast demand or the identified shortfall,</i> <i>(ii) will be realised in a timely manner, and</i>	Wellington Regional Housing and Business Assessment (HBA) 2023 identifies that the strongest demand for housing in the Kāpiti Coast District continues to be centred in Waikanae and Paraparaumu. Their share of growth has fallen slightly from the 2021 projections but still makes up nearly two thirds of all projected growth, with 28% and 27% respectively. In regard to criteria (a),(b) and (c), Mr McGillivray’s evidence identifies that the ongoing supply of housing and the type of housing being supplied remains a factor limiting housing choice and is a contributing factor to housing affordability in Kapiti. Growth is expected to be strongest among people aged 65 and over, leading to a much faster increase in one person and couple-only households, than any other household types. There is therefore an identified shortage of housing diversity that PC5 could make a significant contribution to. In addition, the site is situated close to public transport which would be well suited to the older demographic that it may serve. PC5 would facilitate additional housing supply in Waikanae, directing supply in the area of Kapiti where demand is highest. On approval of the plan change, this development can be realised in a timely manner.

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	<i>(iii) responds to demonstrated demand for the land use types proposed, for the short-medium term in that location; and</i> <i>c) where it provides for housing, the plan change will:</i> <i>(i) as part of a mix of housing typologies, provide for high density development or medium density development, and</i> <i>(ii) contribute to increasing housing affordability through a general increase in supply or through providing non-market housing; and</i> <i>d) the required infrastructure can be provided effectively and efficiently for the proposal, and without material impact on the capacity provided by existing or committed infrastructure for other feasible, reasonably expected to be realised developments, in the short-medium term; and</i> <i>e) the plan change justifies the need for additional urban-zoned land in that particular location to meet housing and business demand, demonstrating consideration of existing feasible, reasonably expected to be realized development capacity within existing urban zones; and</i> <i>f) the plan change can demonstrate it will mitigate any potential adverse effects on the ability of existing urban areas and rural areas to be well functioning, including by minimising potential reverse sensitivity effects and impacts on the feasibility, affordability, or deliverability of urban development anticipated by the district plan.</i>	It is noted that while the HBA looks outward 30 years, growth planning is not restricted to 30 years as evidenced through Policy 2 of the NPS-UD. While there is no design for the site at this stage, PC5 would provide for a mix of housing typologies and medium density development, thereby contributing to housing choice and affordability. Consistency with (a) to (c) is achieved. Transport network effects and the provision of services to the site has been considered within the reports and evidence provided with this plan change. It is considered that the site can be effectively and efficiently serviced within existing and planned capacity, with further detailed consideration given at the time of resource consenting. Consistency with (d) is achieved. Proposed PC5 provides for the most efficient use of a piece of land sandwiched between the expressway and an urban area. The site is not able to be used productively in any economically beneficial manner. The most efficient use would be as residential housing, assisting with the supply required to meet long-term demands. Consistency with (e) is achieved. Proposed PC5 and the appended reports and evidence demonstrate that any potential effects can be appropriately mitigated and will be considered in detail through the resource consent process. The development of the site will form part of a well-

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		functioning urban area (as assessed under Policy UD.5). Consistency with (f) is achieved. Overall, proposed PC5 is generally consistent with Policy UD.3.
Policy UD.4	<i>District and regional plans shall include objectives, policies, rules and/or other methods requiring that subdivision, use and development occurs in a way that supports compact growth by prioritising:</i> <i>a. first, urban development (including unanticipated or out-of-sequence brownfield development) within existing urban zones, with a preference for higher densities in and adjacent to centres with a range of commercial activities and along existing or planned public transport corridors; then</i> <i>b. second, sequenced and planned greenfield urban development beyond existing urban zones, consistent with Policies 55 and 56; then</i> <i>c. third, unanticipated or out-of-sequence greenfield urban development that is well-connected along transport corridors, consistent with Policies 55 and 56, and adds significantly to development capacity consistent with Policy UD.3; then</i> <i>d. fourth, residential or mixed use development in rural areas, consistent with Policy 56; and</i> <i>e. District and regional plans shall apply this hierarchy to enable development capacity while:</i> <i>i. enabling Māori to express their culture and traditions, and</i>	This policy relates to district and regional plan formation. Proposed PC5 would be consistent with Policy UD.4(c) given it is well connected to existing transport and urban amenities, remains generally consistent with Policy 55 and 56 and provides for a shortage of housing choice, adding development capacity consistent with Policy UD.3. In regard to clause e, mana whenua have been engaged. All infrastructure necessary to support development can be provided in an integrated and efficient way (referring to the evidence of Mr Taylor in this regard). PC5 provides for a range of housing typologies and particularly those that are in limited supply. Overall, PC5 remains generally consistent with UD.4.

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	ii. <i>requiring all infrastructure necessary to support development to be provided in an integrated and efficient way which prioritises the use or upgrading of existing infrastructure over the creation of new infrastructure; and</i> iii. <i>providing for a range of housing typologies and land uses, including mixed use development; and</i> iv. <i>for clauses (b) and (c), demonstrating that additional urban-zoned land is necessary and the most appropriate option to enable sufficient development capacity.</i>	
<i>Policy UD.5: Contributing to well-functioning urban areas - consideration</i>	<i>When considering an application for a resource consent, a notice of requirement, or a change, variation or review of a district plan for urban development, including housing and supporting infrastructure, seek to achieve well-functioning urban areas by:</i> a. <i>providing for the characteristics of well-functioning urban environments, in a way that uses land efficiently; and</i> b. <i>where providing housing, seeks to improve housing affordability, quality and choice and provide a diversity of typologies; and</i> c. <i>providing for safe multi-modal access between housing, employment, services, amenities, green space, and local centres, preferably within walkable</i>	Proposed PC5 is considered to align with (a) to (g) for the reasons below: > PC5 provides for efficient use of land that cannot otherwise be utilised economically for productive purposes. > PC5 provides greater housing supply, affordability, quality and choice. It ensures 'at least' sufficient development capacity as required by Policy 2 of the NPS-UD in this regard. > The site is well connected along existing transport corridors and public transport networks and adjoins the General Residential Zone. The site is a natural extension of existing residential development and is close to amenities, employment and services.

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	<i>catchments and using low and zero-carbon emission transport modes; and</i> <i>d. providing for and protecting mana whenua / tangata whenua values, sites of significance to mana whenua / tangata whenua, and their relationship to their culture, ancestral lands, water, sites, wāhi tapu and other taonga; and</i> <i>e. avoiding or mitigating potential adverse effects, including cumulative effects, of urban development on the natural environment, including on freshwater consistent with Policy 42; and</i> <i>f. coordinating development with infrastructure while prioritising, where possible, the effective and efficient use of existing infrastructure; and</i> <i>g. g) protecting the operation and safety of regionally significant infrastructure from potential reverse sensitivity effects.</i>	> Mana whenua have been consulted and a statement is provided with the plan change application in this regard. > Potential effects on the natural environment (including freshwater) have been considered by the Ecological Assessment and evidence of Mr Ushher. With the provisions of the existing District Plan in place, alongside the Natural Resources Plan (Regional Plan) and NES-F, freshwater will be appropriately considered through the resource consent phase if PC5 is approved. > The site is coordinated with and can achieve effective and efficient use of existing infrastructure as addressed through the Engineering Infrastructure Report and evidence of Mr Taylor provided with the application; > The impacts of the potential traffic movements on the M2PP expressway have been considered through the evidence provided by Mr Benner and Mr Wignall. I consider that proposed PC5 is generally consistent with Policy UD.5 and a well-functioning urban area can be achieved.
Policy 55 - Managing greenfield development to contribute to well-functioning urban areas and rural areas - consideration	<i>An application for a resource consent, notice of requirement, or a change, variation or review of a district plan for urban development beyond the region's existing urban zones, will contribute to achieving a compact, well-designed, climate-</i>	This policy seeks that greenfield developments demonstrate appropriate development densities to use the new urban-zoned land efficiently. They should also be located, zoned, laid out, and designed to best support existing urban development or existing or new centres (for example through mixed use zoning) and

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	<i>resilient, accessible and environmentally responsive regional form if:</i> > <i>The location, design and layout of the urban proposed development...Refer to clause (a) to (d)</i>	provide for low and zero-carbon travel, to support compact, connected, climate- resilient, diverse and low-emission neighbourhoods. The site is large enough to generate a development that supports existing urban development and is located in close proximity to public transport networks. Climate resilience has been considered through the flood modelling undertaken. Clause (a) includes managing values or resources as required elsewhere in the Regional Policy Statement. The potential constraints on the site have been given due regard through the reports and evidence provided with the PC5 application and if successful, will be considered again at resource consent stage, under which the existing provisions of the District Plan will be considered. Clause (b) requires consideration to be given to the consistency of the development with the Future Development Strategy (FDS 2024-2054) which will look to deliver well-functioning urban environments through a regional spatial plan. Page 78 of the FDS identifies the intensification of Waikanae. Page 80 outlines infrastructure investment and the future provision of a new primary school within the general residential area of Waikanae. The proposal is consistent with the FDS. Clause (c) requires consideration to be given to whether a structure plan has been provided. A structure plan is a framework to guide the development or redevelopment of an area by defining the future development and land use patterns, areas of open space, the layout and nature of infrastructure (including transportation links), and other key features

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		and constraints that influence how the effects of development are to be managed. A concept plan has been provided given that the land is held in a single ownership and doesn't require a framework to coordinate development over multiple properties. The development of the site can be appropriately managed through the application of existing provisions of the District Plan and through the future resource consent process. Clause (d) requires consideration of a plan change that would add significantly to development capacity, which gives effect to Policy 8 of the NPS-UD. This has been considered within Policy UD.3 above. Overall, the location of this site can maintain a compact, well-designed, and sustainable regional form. I consider that the development is well-connected along transport corridors with connections to public transport. Proposed PC5 will be generally consistent with clause (a) to (d) of Policy 55.
<i>Policy 56: Managing development in rural areas – consideration</i>	<i>When considering an application for a resource consent or a change, variation or review of a district plan for subdivision, use, and development, in rural areas, seek to manage adverse effects on rural areas by considering whether the proposal:</i> <i>a) retains the productive capability capacity</i>	The PC 5 site does not have productive potential as outlined in the evidence of Mr Grant and does not give rise to reverse sensitivity effects or effects on food and other primary production. The amenity of the area will be retained through the application of GRZ standards in regard to site density, boundary setbacks, height and recession planes. Earthwork restrictions in the plan provide assurance that the dune landscapes will be limited to a minimal

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	<i>b) of the rural area, including cumulative impacts that would reduce the potential for food and other primary production</i> <i>c) minimises the potential for reverse sensitivity issues, including on existing production activities, and extraction and distribution of aggregate minerals operations; and</i> <i>d) retains or enhances the amenity aesthetic, cultural and open space values in rural areas between and around settlements; and</i> <i>e) provides for mana whenua / tangata whenua values, including the relationship with their traditions, ancestral lands, water, sites, wāhi tapu and other taonga; and</i> <i>f) supports reductions in greenhouse gas emissions through appropriate location, design and density of development; and</i> <i>g) is climate-resilient; and</i> <i>h) gives effect to Te Mana o Te Wai; and</i> <i>i) for urban development, is consistent with Policy 55; and</i> <i>j) all other developments....</i>	amount of earthworks. The wetland will remain as it is, with continued protection by a QEII covenant. A landscape and visual assessment has been prepared and provided with the application. Mana whenua have been consulted and their values will be provided for through an archaeological authority and further consultation through the resource consenting process. The site is located in close proximity to public transport networks and adjoins an existing General Residential Zone. Climate resilience will be factored into the design of the site development, in particular in the management of flooding. Freshwater values are considered through the NES-F, Regional Plan and District Plan provisions. The plan change is consistent with Policy 55. Overall, proposed PC5 is considered generally consistent with Policy 56.

Other provisions noted for consideration in the Section 42A Report

Table 2 – Additional Provisions of the RPS

Relevant Provision of RPS (as set out in Appendix 1 of s42A Report and Appendix 5 of my evidence)	Assessment
<i>Integrated Management Objective A</i> <i>Policy IM.1 Integrated Management – ki uta ki tai - consideration</i>	Mana whenua have been involved in the preparation of this plan change request. Involvement and engagement will continue into the site design phase and resource consenting of any future development. The life supporting capacity of ecosystems is not expected to be impacted by the plan change and will be investigated again at the detailed level as part of the resource consent consideration. The PC is considered to create a well-functioning urban area and, with proximity to public transport links, is likely to reduce climate change emissions from less reliance on the use of private vehicles. The PC responds to development pressures and opportunities.
<i>Objective CC.1</i> <i>Policy CC.1</i>	The site for PC5 has been assessed as a well-functioning urban area. The proximity to public transport may encourage reduced emissions by removing the reliance on private vehicles.
<i>Objective CC.4</i>	Stormwater designs are available which incorporate nature-based solutions and this will be confirmed through resource consenting.
<i>Objective CC.6</i> <i>Policy CC.7</i>	Climate change has been factored into flood models as part of this plan change and opportunities exist to enhance pedestrian connectivity and cycling as identified in the Transport Assessment.
<i>Objective 12</i> <i>Policy 40</i> <i>Policy 42</i>	Mana whenua have been involved in this preparation of this plan change request. Involvement and engagement will continue into the site design phase and resource consenting of any future development. The effect of this plan change on the health of freshwater ecosystems and waterbodies has been considered through the ecological assessment and evidence provided by Mr Ussher. The NRP and RPS will be considered through the preparation of resource consents once design of development is established. Hydraulic neutrality is expected to be achieved. Riparian buffers for urban development adjacent to natural waterbodies would be required if there was a potential adverse effect identified through the resource consent process.
<i>Policy 41</i>	Erosion and Sediment Controls are likely to be imposed as a condition of consent to ensure sediment is controlled during future earthworks.

Objective 16 Objective 16B Policy 47 Policy IE.2 Policy IE.2A	The effects of this plan change on ecosystems and habitat have been considered. The likely implications on the 'Osborne Swamp' have been assessed. Through resource consenting, the provisions of the NES-F and NRP will be relevant. Mana whenua have been involved in this preparation of this plan change request. Involvement and engagement will continue into the site design phase and resource consenting of any future development.
Objective 19 (refer to consent order in Appendix 5 of my evidence) Objective 21 Policy 29 (refer to consent order in Appendix 5 of my evidence) Policy 51 (refer to consent order in Appendix 5 of my evidence)	The risk from flooding is considered low under the NPS-NH matrix as discussed in the evidence of Mr Martell. Low to medium risk can be managed proportionately through the resource consent process and site design. A subdivision and development on this site could avoid, minimise, or not increase the risks from natural hazards in a way that is proportionate to the risk or hazard.
Objective 20	Mr Ussher has considered flood risk and the implication of this on ecology.

Table 3 – Additional provisions of the NRP

Relevant Provision of NRP as stated on pg 19 of the s42 A Report	Assessment
Objective O4	As demonstrated by the ecological assessment and evidence of Mr Ussher, the intrinsic values of freshwater are recognised and life supporting capacity can be safeguarded.
Objective O21	The need for vegetated riparian margins could be considered through the resource consent process if there is an effect identified that warrants them.
Objective O33	The LUC 2 soil on this site is not productive (refer to evidence of Mr Grant) and the most appropriate use is therefore considered to be residential development on this site. Soil erosion will be considered through consenting, with the likely need for an Erosion and Sediment Control Plan during construction.
Policy P1	Integrated catchment management is considered to be achieved for the reasons set out in Table 2 above.

Relevant Provision of KCDC District Plan	Assessment
Policy P3	This policy is relevant in the consideration of natural hazards. A precautionary approach has been applied through the climate change considerations factored into flood modelling as provided by Mr Martell's evidence.
Policy P15	PC5 is not considered to be incompatible with Regionally Significant Infrastructure. The potential effects on the M2PP interchange has been considered in the evidence of Mr Benner and Mr Wignall.
Policy P30 and P31	Ecological effects from this plan change have been considered through the evidence of Mr Ussher.
Policy 83	Stormwater considerations have been provided through the evidence of Mr Taylor. The stormwater design for the development will mimic the natural hydrology of the site and will be designed to be hydraulically neutral.

Table 4: Additional provisions of the District

Relevant Provision of District Plan	Assessment
DO-O8 Strong Communities	The location of the site supports a cohesive and inclusive community given that the site adjoins the GRZ zone. The site can facilitate the efficient use of existing and planned three waters infrastructure, is well connected to public transport and active mode facilities and is in proximity to all urban amenities of Waikanae and the wider region.
UEDI-P1 – Urban Design	The site adjoins an existing GRZ and is opposite the Ngarara Development Area and future development can complement the urban environment around it. The site forms part of a well connected and integrated transport network, with ease of access to public transport. Specific urban design considerations will be factored into site design through the resource consent process and the application of the Residential Design Guide (APP24 of the District Plan) will provide guidance around this.
UFD-P11 – Amenity Values	Existing rules and standards of the District Plan in the GRZ Chapter ensure management of amenity effects of new development (including yard, height, recession plane, site coverage and landscaping standards).