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Tēnā koutou

Please find attached Kāpiti Coast District Council's (Council's) submission on the National Engineering Design Standards proposal document (August 2026).

Council would like to thank Taumata Arowai for the opportunity (and the extension in time) provided to us to comment on the proposed design standards.

This letter briefly summarises key points of our submission, broadly against the key questions in the proposal document.

Council's more detailed comments are attached, and also include comment from Awa, our Stormwater consultant, in an attached memorandum. This also reflects on our Council's experience with our current development-control framework.

Question box 1: The overall NEDS framework

- *Is the proposed NEDS framework clear, practical and usable for the sector?*
- *What would make it more practical?*
- *Do you think this framework will be enduring as the Authority regularly reviews, updates and adds to the standards and codes of practice over time?*

Overall, Council supports:

- a nationally consistent, performance-based framework for water supply, wastewater and stormwater infrastructure.
- the proposed three-layer model, subject to clearer boundaries between mandatory outcomes, deemed-to-comply codes, alternative solutions and local network-owner requirements.

Council believes that the framework should standardise matters where national consistency creates clear public health, environmental, resilience, efficiency and whole-of-life benefits, while preserving tightly controlled local inputs where hazards, receiving environments, network configuration, operational practice or approved products genuinely differ.

We recommend Taumata Arowai:

- Confirm the three-layer NEDS model and publish a clear legal and technical hierarchy.
- Create a nationally consistent alternative-solutions and departures process.
- Limit local requirements to defined, justified and published inputs or schedules.
- Provide risk-based transition arrangements for legacy assets, repairs, renewals and upgrades.

Question box 2: Common objectives

- *Do you think the proposed common objectives capture the most important outcomes that water infrastructure must support?*
- *Are there any other objectives you think should be included in the NEDS?*

Council supports the seven proposed objectives. They cover the principal outcomes needed for infrastructure performance. However, we think they can be strengthened. More detailed thoughts on each area are in the attached submission.

We recommend Taumata Arowai:

- Strengthen common objectives through measurable evidence, lifecycle value, resilience, operability, maintainability and cultural/environmental context.

Question box 3: Codes of practice

- *Do you think codes of practice should be structured by component or lifecycle activity? Or both?*
- *Does the proposed structure for the codes of practice reflect how designers, developers, contractors, reviewers and water service providers use compliance pathways?*

Council recommends a hybrid organising model: separate service-specific codes arranged primarily by infrastructure component, supported by mandatory cross-cutting lifecycle modules for design assurance, construction, testing, commissioning, asset data, handover, maintenance, renewal and decommissioning. This reflects how KCDC's Land Development Minimum Requirements (LDMR), standard drawings and approved-products controls operate together: requirements, drawings, products, engineering approvals, departures, inspection, certification and vesting form one assurance system rather than standalone documents.

We recommend Taumata Arowai:

- Use service-specific, component-led codes supported by common lifecycle modules and digital navigation.
- Test code usability with KCDC and other providers against existing approval, inspection, certification and vesting workflows.

Question box 4: The prioritisation approach

- *Do you think the two questions above capture the most important things we should consider when prioritising the first set of NEDS? Is there anything else we should consider?*
- *Looking at the full lifecycle of water supply, wastewater and stormwater infrastructure (from design and construction through to operation, maintenance and decommissioning), what are the areas where you currently see the most challenges and inefficiencies?*
- *Which areas do you think would benefit most from having a consistent national standard and code of practice?*

For prioritisation, Council supports the proposed “prioritised NEDS” option but recommends a transparent, scored and gated method. Public health and statutory obligations should be threshold considerations. Candidate topics should then be assessed for national benefit and readiness, with explicit weighting for lifecycle cost, resilience, environmental outcomes, market scale, implementation burden, local variability, interoperability and transition risk. The first tranche should create an end-to-end usable pathway for common reticulation and development infrastructure, rather than isolated technical clauses.

Council also recommends a distinct stormwater pathway within NEDS. Stormwater performance is driven by land use, catchment response, rainfall and runoff, receiving environments and changing climate conditions rather than population alone. National requirements should therefore define a risk-based method, evidence expectations and adaptive-management process, while allowing catchment- and site-specific design inputs and covering the full range of piped, open-channel, green and nature-based infrastructure.

Council further recommends that future NEDS development address multi-storey water supply and wastewater servicing and reconcile detailed wastewater hydraulic criteria with NZS 4404 and established territorial authority requirements. Stormwater pump stations should also be covered where pumping is unavoidable, while retaining the principle that pumping is generally an exceptional solution.

We recommend Taumata Arowai:

- Select the first tranche using threshold gates, weighted scoring, evidence confidence and package/dependency review.
- Publish candidate scores, reasons for decisions and readiness work for deferred high-value topics.
- Prioritise end-to-end pathways for common reticulation, connections, construction, testing, commissioning, asset data and vesting.
- Develop dedicated requirements for multi-storey water supply and wastewater servicing.
- Reconcile wastewater hydraulic criteria with NZS 4404 and established territorial authority standards.
- Develop a dedicated stormwater pump station and flood-management pathway where pumping is unavoidable.
- Subject detailed technical standards to further sector review before implementation.

We would also like to note that Council and our Water Services staff would be particularly interested in working with you as the Standards are developed for adoption.

Nāku iti noa, nā



Kris Pervan
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