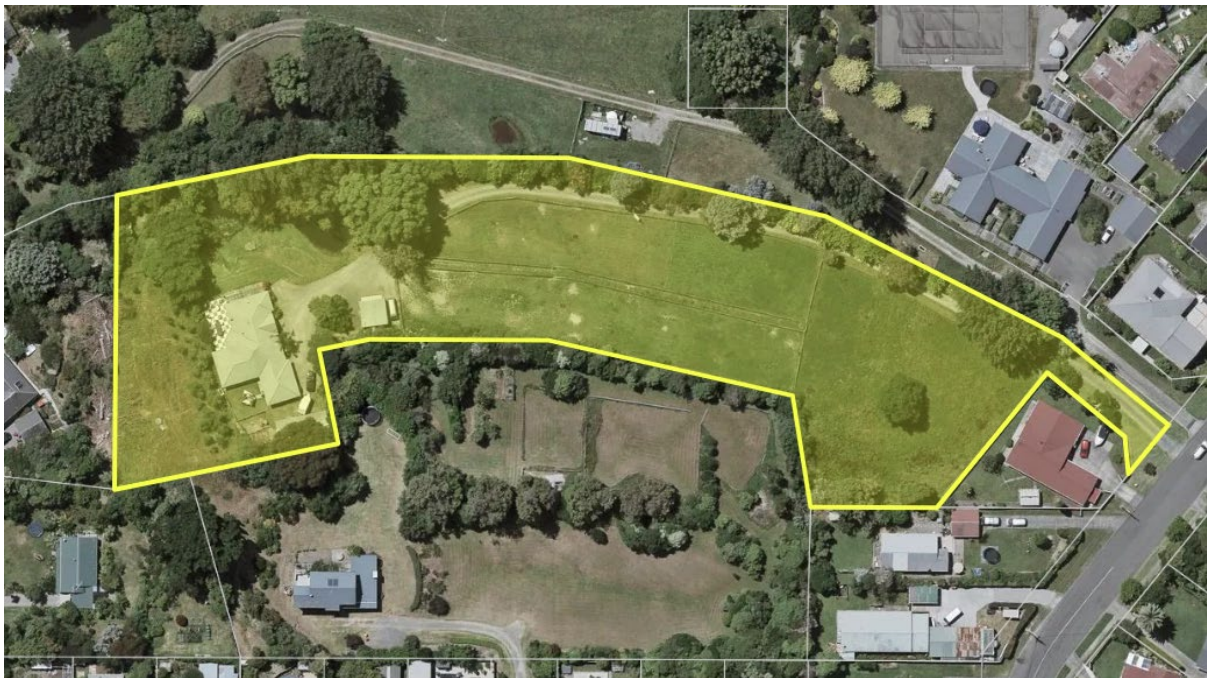




# 14 GREENAWAY ROAD, WAIKANAĒ, SITE SUBMISSION



PLAN CHANGE 2 SUBMISSION SEPT 2022 (LANDLINK REF 3025)

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## 1. Submitter Details

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<b>I would like my address for service to be my email</b>	Yes
<b>I have selected email as my address for service, and I would also like my postal address withheld from being publicly available [select box if applicable]</b>	Yes

## 2. Summary

As part of the Kāpiti Coast Districts Councils (KCDC's) response to projected growth throughout the region they have recently developed 'Te tupu pai – Growing Well', a proposed approach for sustainable growth. Alongside the development of a growth plan local governments across the country have been working to implement requirements under NPS-UD resulting in a number of changes to District Plans through an Intensification Planning Instrument/Process (ISP/ISPP).. Sections 77G and 77N of the RMA require that District Plans of Tier 1 Authorities give effect to Policy 3 and 4 of the NPS-UD.

This is a submission on Kāpiti Coast Districts Councils Plan Change – Plan Change 2. This submission is provided based on the scope provided through the ISPP & IPI instrument and processes, although we note that this marries up with some of the work on the Growth Strategy (and underpinning data) we are submitting with a focus on the Plan Change 2 Submission remit and not beyond.

As a local and experienced land development advisor that has been operating along the Kāpiti coast for over a decade Landlink has built a wealth of knowledge which informs our day-to-day decisions, operations and longer-term strategies. As part of this process we want to use what we know about and local aspirations, development, infrastructure and demand to positively contribute to policy development and decisions which influence and will ultimately shape our community.

We appreciate the time pressures councils have been under to integrate these requirements and the amount of work involved. We believe that we can add value which should not be underestimated as part of this process and thank you for the opportunity to participate.

## 3. Submission Scope

The specific provisions of the proposed plan change that this submission relates to are:

- The exclusion of 14 Greenaway Road, Waikanae from Proposed Plan change 2 residential rezoning.


This submission advocates that Plan Change 2 includes 14 Greenaway Road as a residential site to be rezoned to ensure that effect is given to Policies 1, 2 of NPS-UD 2020.

Landlink has also examined Councils responses to the Draft Plan Change 2 documents and have summarised the general methodology for this request in this submission.

Hearing Submissions	
I wish to be heard in support of my submission	YES
I do not wish to be heard in support of my submission.	N/A
If others make a similar submission, I will consider presenting a joint case with them at a hearing.	YES
If others make a similar submission, I will not consider presenting a joint case with them at a hearing.	N/A

# SUBMISSION

## 4. Site Profile

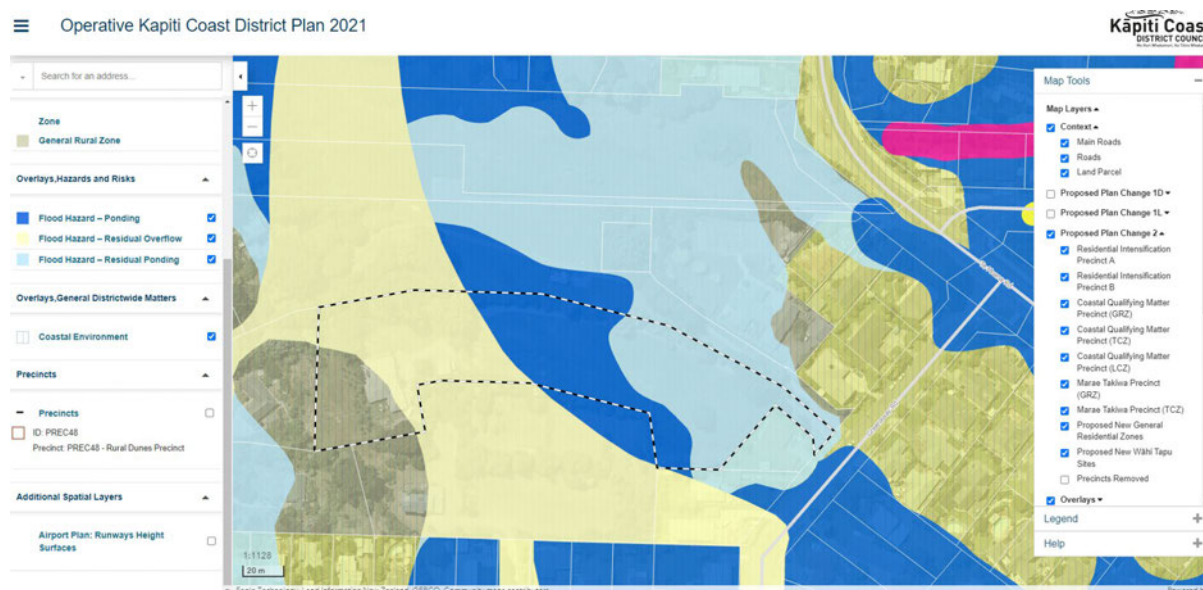
Site Address	14 Greenaway Road, Waikanae
Legal Description	Lot 2 DP 78308
Study Area Reference (BM 2022)	WA-03
	 <p>Figure 1: Future Urban Study Area WB-02 – Kāpiti Coast Urban Development Greenfield Assessment 10/2021</p>
Record of Title	WN37B/555
Registered Interests	<p>Fencing Covenant in Transfer B044625.1</p> <p>Easement Certificate B599925.12</p> <p>B599925.7 Consent Notice</p> <p>Easement Certificate B599925.12</p>
Site Area	1.102ha
District Plan	Kāpiti Coast Operative District Plan 2020
District Plan Zone	General rural zone
District Plan Feature(s)	<p>Rural Dunes Precinct</p> <p>Coastal Environment</p> <p>Airport runway Surface Heights</p>
District Plan Hazard(s)	<p>Flood Hazard – Ponding</p> <p>Flood Hazard – Residual Ponding</p> <p>Flood Hazard – Residual Overflow</p> <p>Stream corridor</p>
District Plan Transport Network Hierarchy	Neighbourhood access route
Proposed Plan change 2	<u>N/A</u>

Regional Policy Statement	Regional Policy Statement for the Wellington Region 2013
Regional Policy Statement Feature(s)	N/A
Regional Plan	Proposed Natural Resources Plan Appeals Version 2019
Regional Plan Feature(s)	Category 2 Surface Water Bodies Lowland areas for Category 2 Surface Water Bodies
Regional Hazard(s)	Combined Earthquake Hazard

## 4.1 Site background

Currently the site is zoned General Rural and is within the Rural Dunes Precinct. Given the general growing urbanisation surrounding the site and intensification directed to both the North East and West (through Proposed Plan Change 2) the site can be considered to be in a prime location to facilitate future residential development and provide opportunity for density as directed through the NPS -UD.

FIGURE 1 OPERATIVE KCDC DISTRICT PLAN PROVISIONS (INCLUDING PROPOSED PC2 ) 2021



Source: <https://eplan.kapiticoast.govt.nz/eplan/#/Property/7921>

## Zoning

The current zoning is restrictive in terms of allowing for future development. Arguably given the neighbouring residential zoning which will facilitate greater density through the MDRS, the intensification of areas on each side of the site (local and town centres) and the recent development of the highway the current rural dunes zoning appears overly restrictive within the context of the area.

It is also unlikely that the focus of primary production activity in the rural zones precinct is still a pertinent consideration of this site. As can be seen in Figure 2 below, there is no/very limited



potential for production activity to be undertaken on any of the 4 small and relatively fragmented existing lots, all of which boarder the existing residential zone.

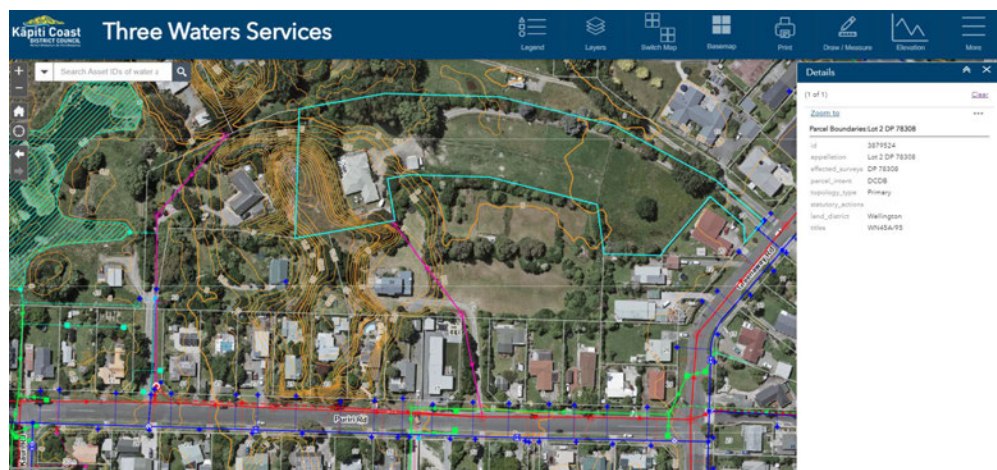
FIGURE 2 OPERATIVE KCDC DISTRICT PLAN PROVISIONS: LOT DETAIL2021



### Infrastructure

The existing residential dwelling on site has a private wastewater connection however, existing public infrastructure in the area can readily support development e.g. accessible sewer, water, roading, electric and telecommunications. This site is 'ready to go' in terms of infrastructure availability.

FIGURE 2 THREE WATERS SERVICES KCDC GIS 2022



### Productive Activity Focus

It is acknowledged as per the District Plan and developing NPS for Highly Productive Land that highly productive soil and primary production activity is valued and to be preserved where possible however this rural area can be seen to have limited rural productive value for a number of reasons. These include but are not limited too:

- The presence of a nearby wetland and other natural features which could create obstructions and considerations effecting the viability of production activities
- The existing fragmented nature of rural lots in this area and surrounding residential uses mean that the small area of this land which is vacant would have a low productive yield
- The expressway designation and stormwater systems
- General urbanised environment

## Access

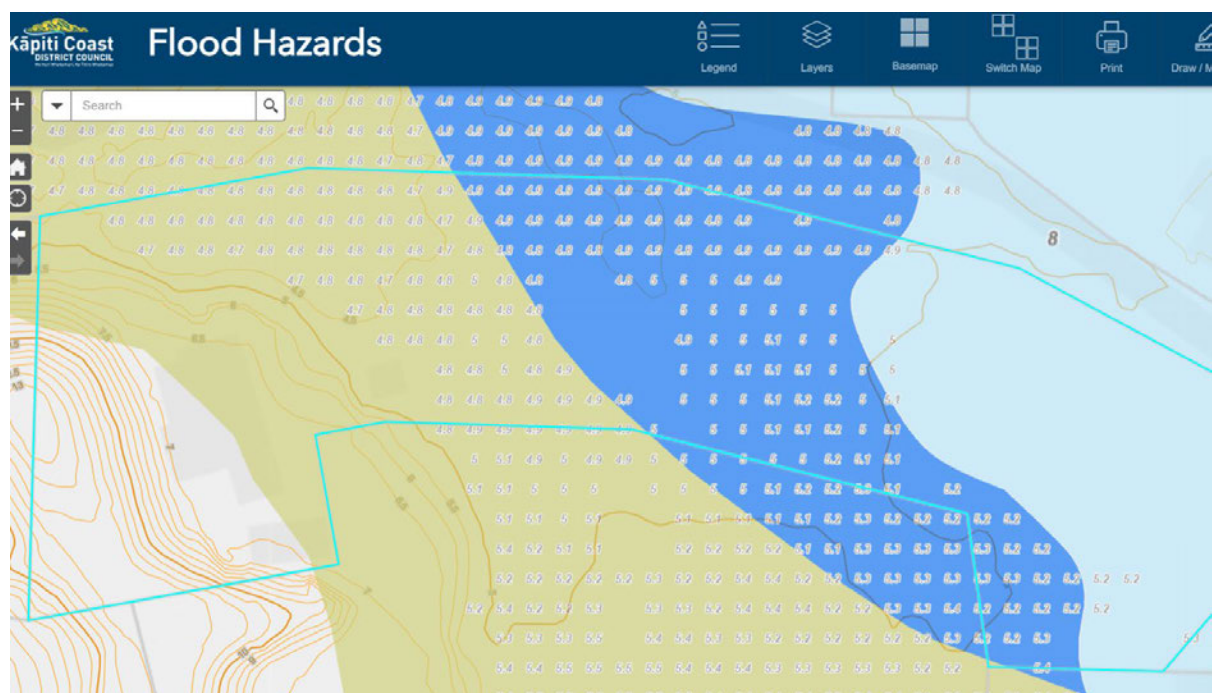
Access to the site is from Greenaway Road which leads straight on to Te Moana Road and provides excellent connectivity to public transport and opportunity for future occupants to use other greener modes of transport.

## Flood Hazard

The site has a number of flood hazards identified through the district plan. These are a consideration of future development and there are a number of existing provisions and strategies to manage flood risk which is a nationwide/district wide issue. Given the nature of flood extents in the general area and throughout the existing residential zone the issues posed by flood risk should not inhibit a decision to rezone as they would be managed through any subsequent development.

From KCDC data currently available online it is noted that current RBL for the site ranges between 4.7-5.2 and contours of the site indicate ground levels of 4.5-6.5 when assessing this at a high level and removing consideration for the freeboard an assumption can be made that flood risk can indicatively be managed efficiently. Flood risk on site may also be impacted by the work and management of stormwater as part of the expressway development which would be a further potential consideration of future development.

FIGURE 3 KAPITI COAST GIS FLOOD HAZARD MAPS



## Liquefaction Constraint



It would not be supported that the consideration of liquefaction risk is a constraint that could be considered detrimental to the rezoning of the site to residential. Liquefaction risk is present throughout the country and is managed by a range of policy provisions including those in district plans and the Building Act/Consent process.

## 4.2 Growth plan submission

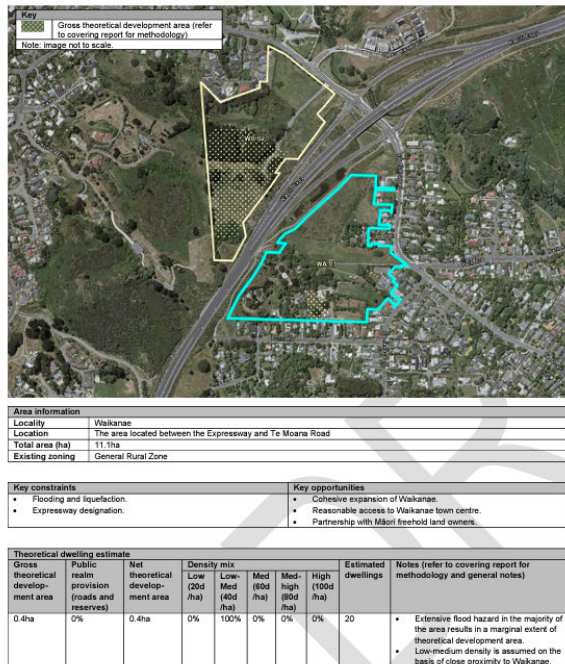
This site is an area which was previously identified as site WA-03 in the Boffa Miskell Greenfield Urban Development Assessment (2021) which it is believed informed the proposed rezoning of 13 smaller areas to residential informing Plan Change 2. As part of this process the site was categorised as Priority Area 2B *‘a potential candidate for medium- or long-term urban development, however there are several constraints to overcome that may require significant strategic decision-making’* (Boffa Miskell 2020). Our submission highlighted that we did not agree with the categorisation or ‘ratings’ against many aspects of the site. A number of points made provided rationale that is informed by a comprehensive understanding of the site and its history – arguably this went beyond the broader approach of the initial desktop study.

FIGURE 4 GROWTH PLAN SUBMISSION ASSESSMENT 2021

KEY CONSTRAINTS	KEY OPPORTUNITIES
<b>Draft comments for NV-01</b>	
<ul style="list-style-type: none"> <li>Expressway designation.</li> <li>Ecological sites, wetlands and waterbodies.</li> <li>Flooding and liquefaction.</li> <li>Adjacent wāhi tapu site (urupā).</li> </ul>	<ul style="list-style-type: none"> <li>Cohesive expansion of established urban form.</li> <li>Reasonable access to Waikanae town centre</li> </ul>
<b>Review comments</b>	
<ul style="list-style-type: none"> <li>Expressway completed - no longer a constraint</li> <li>Natural features can be integrated through design and protected as part of development considerations</li> <li>Flood risk requires further investigation</li> <li>Precluding northern end of site from development overlooks the benefits of sound engineering and urban design solutions, further investigation is required and warranted.</li> </ul>	<ul style="list-style-type: none"> <li>Provides a site in areas of co-joining urban form.</li> <li>Provides for variety of housing types</li> <li>Natural features provide opportunity for innovative urban design and complement amenity and wellbeing<sup>1</sup></li> <li>Infrastructure is existing and can be readily utilised</li> <li>Creates open space connectivity and regenerative living opportunities.</li> </ul>

FIGURE 5 BOFFA MISKELL WA-03 STUDY AREA

## Future Urban Study Area WA-03



Criteria	Observations	Rating
Mana whenua values	<ul style="list-style-type: none"> <li>The headwaters of the Waimeha to the east of the area are recognised as a site of significant to Te Arawa ki Whakarangotahi.</li> <li>There are a number of archaeological sites located throughout the area.</li> <li>The influence Takamore unupā and wāhi tapu site to the west is a significant consideration in terms of development of the area.</li> </ul>	
Iwi development aspirations	<ul style="list-style-type: none"> <li>The central portion of the area is Māori freehold land.</li> </ul>	
Urban form	<ul style="list-style-type: none"> <li>Development of the area would function as a cohesive consolidation of urban form at Waikanae.</li> </ul>	
Local neighbourhoods	<ul style="list-style-type: none"> <li>Development of the area would be an extension of the established neighbourhood at western Waikanae.</li> </ul>	
Activity centres	<ul style="list-style-type: none"> <li>The area has good access to the local centre on the corner of Te Moana Road and Waimea Road, although this requires crossing the Expressway.</li> <li>Development of the area is likely to support the development of the existing local centre.</li> <li>Waikanae town centre is located approximately 3.5km to the east, along Te Moana Road.</li> <li>The nearest schools are at Waikanae to the east.</li> </ul>	
Residential development	<ul style="list-style-type: none"> <li>Extensive flood hazard covering most of the area reduces potential development. Potential to contribute to dwelling supply is marginal as a result.</li> <li>Location within urban Waikanae may encourage the development of a range of typologies.</li> </ul>	
Business land	<ul style="list-style-type: none"> <li>There is no existing business zoned land in the area.</li> </ul>	
Transport networks	<ul style="list-style-type: none"> <li>There is access to the area from Te Moana Road and Greenaway Road.</li> <li>The area has immediate access to the Expressway via the adjacent interchange.</li> <li>There is an existing bus route that runs along Te Moana Road.</li> <li>There is reasonable access to Waikanae Station and town centre via active modes along Te Moana Road.</li> </ul>	
Infrastructure and servicing	<ul style="list-style-type: none"> <li>Existing water supply trunk and reticulation mains run along Te Moana Road adjacent to the area.</li> <li>Existing waste water reticulation runs along Te Moana Road adjacent to the area.</li> <li>Depending on scale, development in the area may trigger upgrades to the existing waste water plant, and/or pipes and pump stations between the area and the plant.</li> </ul>	
Natural ecosystem values	<ul style="list-style-type: none"> <li>There are no identified ecological sites within the area.</li> </ul>	
Water bodies	<ul style="list-style-type: none"> <li>There is a pond located in the south-western extent of the site.</li> </ul>	
Landscape and open space values	<ul style="list-style-type: none"> <li>There are no identified special amenity landscapes in the area.</li> <li>The area has good access to open space Waikanae Park.</li> </ul>	
Heritage values	<ul style="list-style-type: none"> <li>There are no listed heritage features in the area.</li> <li>There are a number of archaeological sites located throughout the area.</li> </ul>	
Topography	<ul style="list-style-type: none"> <li>The topography of the area is flat towards Te Moana Road, and increasingly hilly towards the Expressway.</li> </ul>	
Natural hazards and land risks	<ul style="list-style-type: none"> <li>The majority of the area is identified as being subject to flood risk. High consequence hazard associated with the flooding of the Waikanae river in this location. Could be a potential 'fatal flaw' for development in this location.</li> <li>The south-western corner of the area is identified as being subject to high liquefaction risk.</li> </ul>	
Land use compatibility	<ul style="list-style-type: none"> <li>A significant portion of the area is covered by the Expressway designation, although this could be reviewed with Waikā Kotahi, and is not necessarily a constraint.</li> <li>Development is likely to have reverse sensitivity effects on the Expressway.</li> <li>The natural gas network runs through the western portion of the area.</li> <li>Established rural lifestyle development in the area may be resistant to urban development.</li> <li>The influence Takamore unupā and wāhi tapu site to the east is a significant consideration in terms of development of the area.</li> </ul>	
Highly productive land	<ul style="list-style-type: none"> <li>The eastern half of the area is identified as LUC 1, however it is relatively discontinuous with other potentially highly productive areas.</li> </ul>	
Climate change (low-carbon futures)	<ul style="list-style-type: none"> <li>Consolidation of existing urban form and connecting to established infrastructure services is likely to be less resource intensive.</li> <li>The area has good access to activity centres and regional public transport, with reasonable opportunities for access to these areas by active modes of transport.</li> </ul>	

Notes:  
 \* Feedback on mana whenua values and iwi development aspirations was obtained during the Council Officer workshop on the 19th of July. It is acknowledged that engagement with mana whenua will provide the basis for understanding mana whenua values and iwi development aspirations.

As part of the growth plan submission it was requested the below factors were further investigated to provide a more in depth and balanced assessment of the proposal. Specifically the request included that:

### Further investigation is undertaken on site 'WB-03' focusing on:

- Technical assessments
- Re-evaluated flood risk analysis post expressway development (refer
- Councils updated flood risk modelling)
- Engagement with Iwi and manu whenua to develop greater understanding of any heritage concerns in relation to the site
- Geotechnical and liquefaction issues

### Planning matters are further explored

- A re-evaluation of site/reassess draft priority rating from '2B' to '1'
- Further engagement facilitated with council to discuss future development potential, cohesive planning approach, work through approaches to constraints
- Consideration given to revised yield potential assessment – amending
- Analysis to include development potential to the North of the

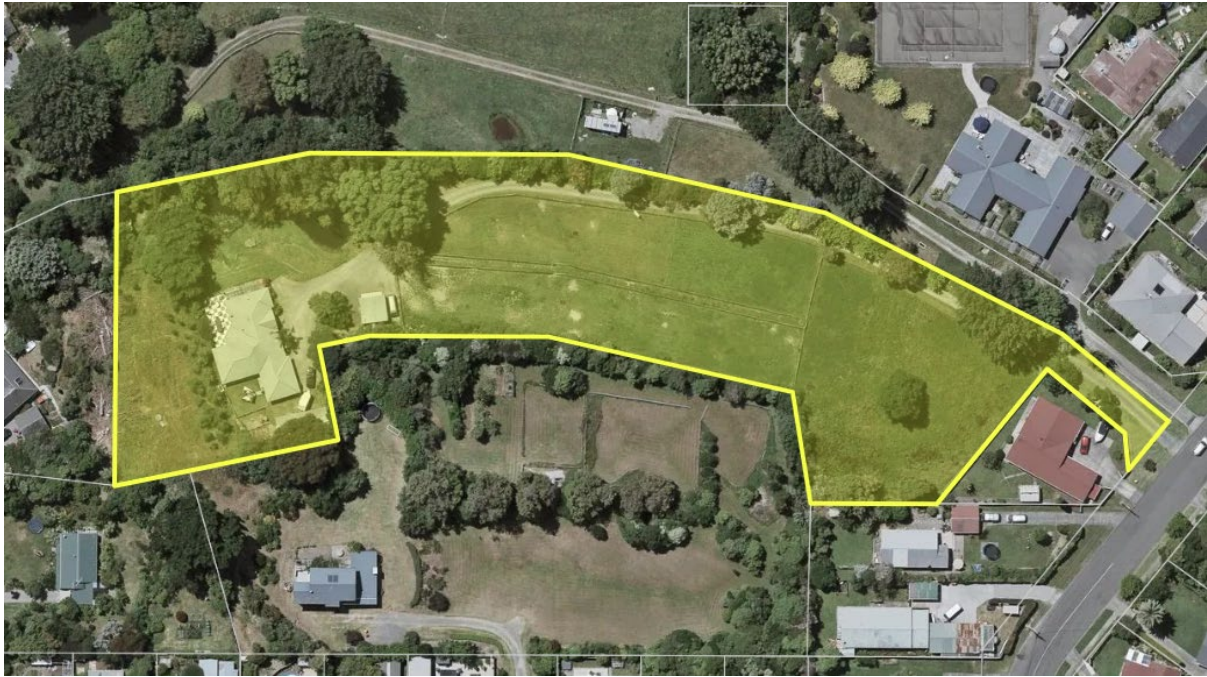
It is not evident that any further investigation was undertaken into the site as part of the process or as Proposed Plan Change 2 has progressed.

On review of the Proposed Plan change we have reviewed:

- Our original submission (Growth plan)
- Councils response to our original submission
- The requirements of the NPS-UD

We have attached a copy of our original submission which was in response to the Growth Plan (please see attachments). On reviewing council feedback and the initial assessment from the Boffa Miskell Assessment it did appear that in some areas/responses a 'blanket brush' approach was taken e.g. flood hazards and liquification being rationale to rate sites as a lower priority when they are issues which are present and managed daily through development decision across the country/region.

FIGURE 6 SITE FOR INCLUSION IN RESIDENTIAL INTENSIFICATION PRECINCT



## 5. Commentary Plan Change 2

Plan change 2 has identified 13 small sites which are proposed to be rezoned from their current zoning to 'General Residential'. We understand this activity is to give effect the relevant policies in NPS -UD in particular ensuring planning decisions that contribute to a well-functioning urban environment and ensuring sufficient development capacity to meet demand through the district plan. The inclusion of this site as part of the residential zone would contribute to the implementation of NPS-UD policies and have wider benefits for the community in providing future development potential. We believe any potential adverse effects could be managed through other development provisions and that the constraints previously identified are not sufficient reason to preclude this site from re-zoning through Plan Change 2.

The rationale for the recommendation in this report is summarised in the points below, more information can be provided on any of these points as required. We have further assessed relevant policies of the NPS-UD against our recommendation.

- **Prime location** – The site lies in the centre of two established and increasingly urbanising areas. This includes the Waikanae Beach Community and proposed intensification precinct to the west and Waikanae Town centre to the east. Along Te Moana Road and in the surrounds there are also a range of amenities and services to support the community e.g. childcare/schools/shops/parks. We also note that the site is also 'well connected' being within close proximity of local bus routes and a short distance to both the express way and train station.
- **Alignment, context and urban form** - Although currently within the rural zone the character and context of the area is changing and being increasingly urbanised. In particular the site is within close proximity to a proposed intensification precinct and local centre (approx. 800m & 500m<sup>1</sup>). The rural zoning of this site no longer appears pragmatic and in keeping with the central policy direction driving intensification in existing and established Urban areas.

Consideration should be given to the fact the site is not a submersed rural site but an area on the fringes of an existing residential area. The existing rural lots are notably fragmented with numerous smaller lots and subdivisions taking place in the surrounds over the last couple of decades. Due to this fragmentation it is unlikely that the site will be practically used in a productive capacity particularly given the surrounding residential uses and the location of a nearby ecological site/wetland.

Rezoning this site as residential would contribute to a cohesive local pattern of residential development which is a key feature of good urban design i.e. clustering development around existing urban areas. This approach is supported by the district plan, and supplementary rural and urban design guides. We also note key focuses of the district plan, NPS-UD and Te Tupu Pai is the provision of 'Diverse housing options' (KCDC 2022), having larger areas of land available in residential areas will support this focus through providing ample opportunity for increasingly innovative and sustainable design features.

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<sup>1</sup> As the crow flies



- **Feasible management of constraints** – In its response previous submissions response council noted that this site was ‘subject to a range of constraints’ (Appendix B Summary of submissions on Draft PC 2 2022). We are aware there are a number of considerations in relation to the site which will require a planned and strategic management approach, but we do not believe these amount to ‘sufficient complexity’ (KCDC 2022) and as such should not be considered reasonable impediments to shorter term development or for the purpose of rezoning in this context.

The key two constraints noted in the Greenfield assessment are assessed further below with particular thought given to surrounding context and decisions made around nearby sites noted to have similar constraints.

Expressway Reserve Sensitivity/designation	<ul style="list-style-type: none"> <li>• Can be managed through design we note that the notion of higher density development will require utilisation of sites with constraints and as such will require innovative design and thinking. This rationale should not impeded short term potential. We note the local centre/ Ngārara zone provides residential uses which would have similar considerations around reserve sensitivity. Additionally the expressway designation may no longer be considered as pertinent as work is completed and no future works planned we are aware off. Designation issues could also be managed through district plan provisions.</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>• There are a number of provisions and strategies to manage flood risk which is a nationwide/district wide issue. However, provisions in the district plan would manage flood risk as appropriate to mitigate or remedy any adverse effects considered part of future development. We also note the intensification precinct within close proximity which has a very similar flood risk constraints – we assume council has taken the view these constraints in that very nearby area can be managed. The management of flood risk on larger (relatively undeveloped) sites allows for holistic stormwater strategy which then can have other broader environmental and ecological benefits.</li> </ul>
Liquefaction	<ul style="list-style-type: none"> <li>• As described in section 4.1 of this report liquefaction risk is managed by a range of measures and we believe is unjustified as a key consideration/constraint for not including this site in Proposed Plan Change 2. .</li> </ul>

- **Site would not require structure plan approach/future plan change process** – It is not thought that the site size and the existing surrounding residential uses would mean that a structure plan/private plan change is a considered feasible or justified (rationale provided for exclusion from Plan Change 2 by KCDC in Summary of Submissions Doc). Given the intent of PC2 and its requirement to be directed at this type of opportunity and provide future capacity it would be pragmatic for council to include this site as an area to be rezoned for residential.

It is also apparent that there are other examples of rural areas which have been considered suitable for proposed rezoning as part of plan change 2 which share similarities in principle (Council owned Land Rangiorua Road, Otaki).

- **Would provide a notable contribution** – Given the existing development in the area and the site area of over 1ha this change request could result in a modest yet notable potential contribution to housing supply which would support the district in meeting its housing aspirations.
- **‘Ready to go infrastructure’** – Future development on site can be facilitated through existing infrastructure. Infrastructure as documented Section 4.1 of this report is considered to align with the NPS-UD definition of ‘Ready to go’ and therefore should be considered as part of Plan Change 2 providing adequate development capacity.
- **Development with strong potential ‘to be realised’** – We note that to achieve the objectives set out by the NPS-UD there are many variables at play. Giving effect to the policies in the NPS-UD as part of plan change to in part is to enable an increased density of development. However, there are no guarantees that development will ‘be realised’ on a number of sites where it is in fact proposed/enabled. It is pragmatic to include where appropriate sites where development has a strong potential ‘to be realised’ as it will support the region in meeting its housing need requirements efficiently. It should also be reinforced that as a prime site with the potential for shorter term development. As with a number of sites where there is significant information already available to demonstrate feasibility for rezoning being subject to future plan change processes as council suggests, particularly private plan changes will be cost and time prohibitive. Notably private plan changes could also bring additional (and potentially unanticipated) workload to council and stakeholders which are already experiencing high levels of demand. This will arguably be determinantal to the actual short-term delivery of much needed housing in the area.
- **Risk Management** – We note that a change of ‘zone’ alone will not automatically enable substantial development on this site and that future development will be subject to a number of national, regional and local district plan provisions (particularly given the flood hazard/qualifying matter). With that in mind consideration around the ‘constraints’, which we understand have contributed to the decision to exclude this site from Plan Change 2, would be managed and risks mitigated accordingly. Consideration should be given to this factor when making decisions around rezoning, at this point in time rezoning would provide opportunity for the future development whilst maintaining key levers for sustainable management.

## 5.1 Giving effect to NPS-UD 2020

We believe that the changes proposed in this submission have the potential to give effect to the below policies of the NPS-UD 2020

- Policy 1 – Incorporating the recommendation to proposed plan change 2 will contribute to a well-functioning urban environment. The site is already part of an established, growing and well connected urban environment with little practical rural production potential due to the surrounding urbanisation of the area.
- Policy 2 – Can contribute to sufficient development capacity to meet demand for housing in the short term.- It is very uncertain that the proposal to rezone 13 small areas will provide sufficient short term capacity to give effect to Policy 2 this site

has the potential facilitate new dwellings of different types enabling choice whilst carefully managing any constraints

- Policy 3 – There is a requirement for Local Authorities to enable increased densities and urban form which is commensurate with the level of commercial activity and community services in the surrounds. It not longer appears suitable to retain this site as an part of the 'rural zone' given surround activities and development.

### **We seek the following decision from KCDC**

We require that this site (area demonstrated in Figure of this submission) is rezoned to 'residential' giving adequate effect to policies and objectives of the NPS-UD 2020.

## Annexures

### Trade Competition

<p><b>Trade Competition</b> <i>[select the appropriate wording]</i></p> <p>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 <a href="#">clause 6(4)</a> of Part 1 of Schedule 1 of the Resource Management Act 1991.</p> <p>I could <input type="checkbox"/> / I could not <input checked="" type="checkbox"/> gain an advantage in trade competition through this submission.</p> <p><i>If you could gain an advantage in trade competition through this submission, please complete the following:</i></p> <p>I am <input type="checkbox"/> / I am not <input checked="" type="checkbox"/> directly affected by an effect of the subject matter of the submission that—</p> <p>(a) adversely affects the environment; and</p> <p>(b) does not relate to trade competition or the effects of trade competition.</p>
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### References and Sources

Kāpiti Coast Urban Development Greenfield Assessment *Boffa Miskell* 2022

Source: <https://www.kapiticoast.govt.nz/media/UDGADraft.pdf> [Accessed 13/09/2022]

Spatial Application of NPS-UD intensification policies Kāpiti coast district *Boffa Miskell*: 2022

Source:

[https://www.kapiticoast.govt.nz/media/wnic5k0t/pc2\\_s32\\_appendix\\_e\\_spatialapplicationpolicy3.pdf](https://www.kapiticoast.govt.nz/media/wnic5k0t/pc2_s32_appendix_e_spatialapplicationpolicy3.pdf)

KCDC Three Waters GIS

<https://maps.kapiticoast.govt.nz/LocalMaps/Viewer/?map=627d29f22676457ca22bc92c19a095cc> [Accessed 10/03/2022]

Operative Kāpiti Coast District Plan 2021

Source: <https://eplan.kapiticoast.govt.nz/eplan/#Rules/0/216/1/0/0> [Accessed on 14/09/2022]

New growth strategy emphasises compact urban form and good design Kāpiti Coast District Council Feb 2022

Source: <https://www.kapiticoast.govt.nz/whats-on/news/2022/new-growth-strategy-emphasises-compact-urban-form-and-good-design/> [Accessed 14/09/2022]

Appendix B Summary of submissions on Draft PC 2 2022 Kāpiti Coast District Council 2022

Source:

[https://www.kapiticoast.govt.nz/media/04bbdt13/pc2\\_s32\\_appendix\\_b\\_draftpc2feedback.pdf](https://www.kapiticoast.govt.nz/media/04bbdt13/pc2_s32_appendix_b_draftpc2feedback.pdf) [Accessed on 14/09/2022]

National Policy Statement on Urban Development 2020 Updated May 2022 *Ministry for the Environment* 2022

Source: <https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-updated-may-2022/> [Accessed 14/09/2022]



## **Attachments**

14 Greenaway Road, Waikanae Site Specific Submission - Te tupu pai – Growing Well *Landlink* 2021

# 14 GREENAWAY ROAD, WA-03 SITE SPECIFIC SUBMISSION



TE TUPU PAI- GROWING WELL KĀPITI COAST DISTRICTS COUNCILS  
SITE SPECIFIC SUBMISSION 2021

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## Executive Summary

As part of the Kāpiti Coast Districts Councils (KCDC's) response to projected growth throughout the region they have recently developed 'Te tupu pai – Growing Well', a proposed approach for sustainable growth. The approach is underpinned by two separate studies which identify and assess the feasibility of future sites for development in the region.

This submission is a site-specific response to 'Te tupu pai' and its underlying assessment (*Kāpiti Coast Urban Development Greenfield Assessment Draft 2021 Boffa Miskell*). As a trusted advisor in land development with a breadth of local knowledge – the issues presented in this submission provide a further overview of information which is imperative when considering future land development opportunities in the area and ensuring sufficient capacity in meeting long term growth. As such we are seeking the further investigation and the re-consideration of the priority ratings provided against Future Urban Study area WA-03 which includes 14 Greenaway Road, Waikanae.

With a plan needed to facilitate a projected 30,000 additional people in Kāpiti over the next 30 years we want to ensure we are supporting the council and the community to make sustainable, logical and responsive choices around growth. This initial submission provides a base of information which can be further expanded as required.

## Site profile / Overview

- **Client site** - 14 Greenaway Road
- **Area** – 1.102ha
- **Study Area Reference** – WA-03
- **Proportion of WA-03 area** - 10% (approx.)
- **Draft Priority rating** - 'Priority Group 2B'
- **Proposed priority rating** - '1'

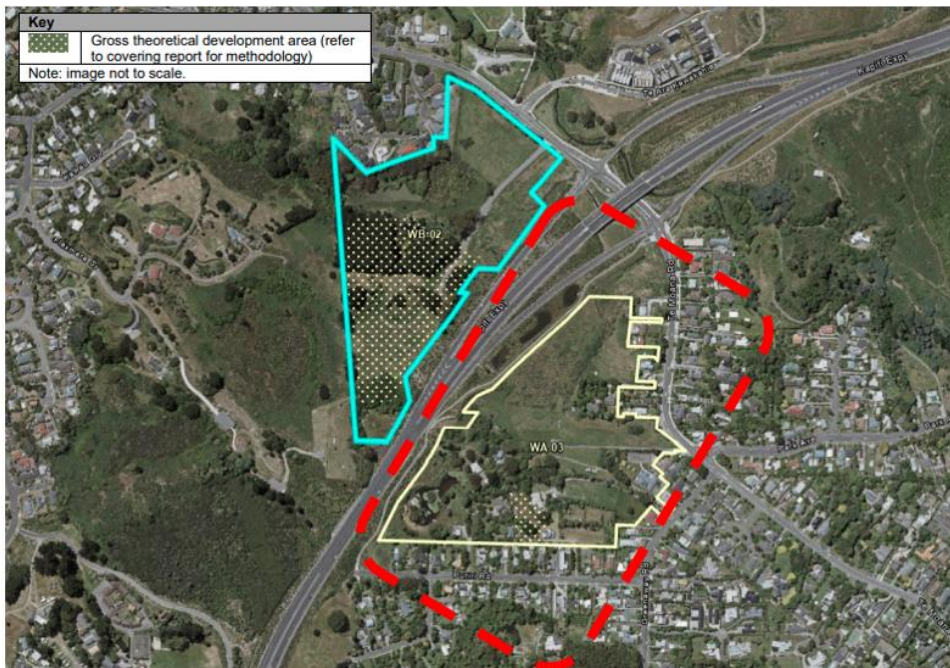


Figure 1: Future Urban Study Area WB-02 – Kāpiti Coast Urban Development Greenfield Assessment 10/2021



## Kāpiti Coast District Plan

- General rural zone
- Rural Dunes Precinct
- Airport Runways  
Heigh Surfaces
- Flood Hazard - Ponding
- Flood Hazard – Residual  
Overflow
- Flood Hazard - Residual  
ponding
- Coastal Environment
- Major community  
connector

## Greater Wellington Region Natural Resources Plan

- Category 2 surface water bodies
- Lowland areas for Category 2  
surface water bodies

## Site Summary

The study area identified as 'WB-03' is a well-connected and well serviced site primed and ready for future growth and development. The site is located in an established urban community and has services and infrastructure available to support new development. We believe that the site constraints identified are overstated and not reflective of the easy to support development potential. As such we strongly recommend the site is further investigated and re-evaluated from Priority Group '2b' to 'Priority Group '1' - realising its potential for short term development.

Services and infrastructure in the area can support development, with accessible sewer, water, roading, electric and telecommunications. The site is located on the fringes of both the established 'Waikanae Beach' and 'Te Moana Road' communities, which have a strong sense of self and also host a range of services and facilities.

Since the expressway has been completed there could also be the possibility to facilitate further residential and mixed-use development of the area through utilising areas historically designated for the expressway. We also note further development of this site would be complementary to the adjacent and recently and successfully developing mixed use area. Good urban design could potentially mediate amenity/reserve sensitivity issues.

Our comparative assessment below strongly indicates that aspects of the site labelled as 'constraints' – largely the flood hazard and liquefaction features have been unjustly weighted to preclude shorter term development underestimating the positive benefits of residential development on this site. We also believe the development potential is largely understated and that the development yield for this site could be more in the region of 40-100+ dwellings.

## Criteria rating Assessment

CRITERIA RATING				
Criteria	Headline Observations	Draft Rating	Commentary	Proposed rating
Mana whenua values	<p>Headwaters of Waimeha to the east significant Te Ātiawa ki Whakarongotai.</p> <p>There are a number of archaeological sites located throughout the area.</p> <p>The influence Takamore urupā and wāhi tapu site to the west is a significant consideration in terms of development of the area.*</p>		Development in consultation with Manu Whenua/Māori landowners. Supporting development around heritage, natural features and manu whenua values.	
Iwi development	The central portion of the area is Māori freehold land		May be an openness to exploring potential of future development.	
Urban form	Development of the area would function as a cohesive consolidation of urban form at Waikanae		Excellent opportunity to integrate with existing urban environment along key transport corridor, current planning	
Local neighbourhoods	Development of the area would be an extension of the established neighbourhood at western Waikanae		Would be an extension of surrounding neighbourhoods including but not limited to the Waikanae beach/Te moana road	
Activity centres	<p>Good access to local centre Te Moana</p> <p>Close to Waikanae Centre</p>		Numerous connection points to established activity centres, excellent transport links to other urban and local centres.	

Residential Development	<p>Extensive flood hazard covering most of the area reduces potential development. Potential to contribute to dwelling supply is marginal as a result.</p> <p>Location within urban Waikanae may encourage the development of a range of typologies</p>		<p>Comprehensive planning required and to realise potential.</p> <p>Further investigation required to mediate flood risk and increase projected density provision. – solutions to flooding issues not prohibitive of development.</p> <p>Contribution to dwelling supply potentially understated. Potential to facilitate a range of development types.</p>	
Business land	No business land zoned in the area.		Business land not proposed but integrated into well-functioning urban environment site is connected to business provision.	
Transport networks	Good access from Te Moana/Greenaway Rd. Access to the expressway and PT.		Good access to SH1, Te moana Road (link to rail), Public transport existing and proposed.	
Infrastructure and Servicing	<p>Existing water supply trunk and reticulation mains run along Te Moana Road adjacent to the area. •</p> <p>Existing waste water reticulation runs along Te Moana Road adjacent to the area.</p> <p>Depending on scale, development in the area may trigger upgrades to the existing waste water plant, and/or pipes and pump stations between the area and the plant</p>		Good provision of existing infrastructure in well-connected urban area. Depending on size of projected developments upgrades may/may not be required.	
Natural ecosystem values	There are no identified ecological sites within the area.		There is however a Kauri tree (notable tree ID T14) which we believe holds some heritage/cultural significance. Development to reflect and integrate heritage/cultural feature.	

Water bodies	There is a pond located in the southwest extent of the site.		Pond does not appear to be noted as an ecological feature. Natural features can be integrated into development and provide focal points for amenity.	
Landscap e and open	No identified special amenity landscapes in the area.		Note rural dunes precinct - surrounding open space allows for high amenity value living	
Heritage Values	No listed heritage features in the area/presence of archaeological sites in the area.		Manu whenua values and development in consideration and engagement with manu whenua/lwi. Accidental discovery protocols apply as ultra vires.	
Topography	Topography flat near Te Moana Road and increasingly hilly towards the expressway.		Development proposed to occur in flatter areas. Good engineering and design practices can support development in areas with steeper topography.	
Natural hazards and land risks	Majority of area subject to flood risk. High consequence hazard in relation to Waikanae River flooding.  Southwestern corner subject to 'high liquefaction risk'.		Flood risk can be mitigated and requires further analysis. Desktop data shows gravels across large portion of site however geotechnical engineering solutions and foundational design can mitigate liquefaction risk.	



Land use compatibility	<p>A significant portion of the area is covered by the Expressway designation, although this could be reviewed with Waka Kotahi, and is not necessarily a constraint. Maybe reverse sensitivity effects on</p> <p>The natural gas network runs through the western portion of the area. Established rural lifestyle development in the area may be resistant to urban development. The influence Takamore urupā and wāhi tapu site to the east is a significant consideration in terms of development of the area.*</p>		<p>High quality urban design can mitigate amenity issues from noise, pollution, visual and amenity effects. Higher density urban living needs to be considered in relation to the presence of infrastructure. Cultural and heritage concerns to be explored through engagement with mana whenua and accidental discovery protocols apply as ultra vires.</p> <p>Development to occur around natural gas network.</p>	
Highly productive land	<p>Eastern half of site identified as LUC1 soils – however relatively discontinuous with other areas</p>		<p>Incohesive and lack of potential for significant scale productive purposes due to fragmentation, surrounding infrastructure and residential uses</p>	
Climate change (low carbon futures)	<p>Consolidation of urban form/development less likely to be resource intensive</p> <p>Good transport links</p>		<p>Consolidation of existing urban form</p> <p>Good transport links and green transport infrastructure (cycle ways) can reduce dependence on private motor vehicle.</p>	
KEY CONSTRAINTS			KEY OPPORTUNITIES	
<ul style="list-style-type: none"><li>• Flooding and liquefaction</li><li>• Expressway designation</li></ul>			<ul style="list-style-type: none"><li>• Cohesive expansion of Waikanae</li><li>• Reasonable access to Waikanae town centre</li><li>• Partnership with Māori freehold landowners</li></ul>	
Review comments				
<ul style="list-style-type: none"><li>• Expressway completed - no longer a constraint potential for land previously designated for highway to support future residential development.</li><li>• Flood risk requires further investigation – desktop data shows risk and site contours do not present a significant difference.</li></ul>			<ul style="list-style-type: none"><li>• Provides a site in areas of co-joining urban form. - site is in a prime location given established communities and adjoining amenities and services.</li><li>• Site provides for potential variety of housing types</li></ul> <p>Site provides for higher residential yield than initially identified.</p>	

<p>Engineering solutions can be explored as part of the design process.</p> <ul style="list-style-type: none"> <li>• Only small section of the site identified as suitable for development which is not an accurate reflection of development potential.</li> <li>• Liquefaction risk requires further exploration and if issue identified – it can be explored/mitigated through geotechnical study/foundation design</li> </ul>	<ul style="list-style-type: none"> <li>• Site is well connected with sound transport links.</li> <li>• Infrastructure is existing and can be readily utilised</li> <li>• Potentially opportunity to partnership with Māori freehold landowners</li> </ul>
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## Revised Yield Potential

The development is likely to be focussed on through the site (particularly those areas which are currently undeveloped/occupied). We propose 40-80 dwellings/units could be possible on this site.

This would be likely to double the immediate yield expectations.

## Recommendations

Following our initial analysis, we have provided the below recommendations and next steps.

### Further investigation is undertaken on site 'WB-03' focusing on:

- Technical assessments
  - Re-evaluated flood risk analysis post expressway development (refer Councils updated flood risk modelling)
  - Infrastructure analysis (services immediately available in Te Moana Road)
- Cultural and ecological investigation
  - Engagement with Iwi and manu whenua to develop greater understanding of any heritage concerns in relation to the site (supported through Māori landowner relationships)

### Geotechnical and liquefaction issues

- Further work on ground conditions is appropriate

### Planning matters are further explored

- A re-evaluation of site/reassess draft priority rating from '2B' to '1'
- Further engagement facilitated with council to discuss future development potential, cohesive planning approach, work through approaches to constraints
- Consideration given to revised yield potential assessment – amending analysis to include development potential to the North of the site

## Additional Information

- Landlink have made this submission on behalf of 14 Greenaway Road – however we are aware they are exploring support for future development with other landowners of study area WA-03

## Alignment with draft Te tupu pai principles and objectives

### Enabling Choice

- Site has the ability to facilitate a range of housing types
- Housing options in an established community provides people with options to facilitate their lifestyle choices positive factor for well-being e.g. medical care, mode of travel, schools, employment

### Valuing our environment

- Ensuring the development of land practices good urban design principles utilising the natural environment and integrating natural design features e.g. contours
- Ensuring the site is used to provide efficient and appropriate density of development
- Clustering greenfield development in established residential settings (neighbouring the site)

### Fostering strong communities

This site is incredibly well connected with its location next to the SH 1 provided direct links to North and South – and being surrounded by established public transport networks

- Provides for development in established residential communities with a strong sense of identity
- Provides housing potential in an area which already hosts a range of amenities and services (schools, health care facilities, open space)

### Supporting Manu Whenua Aspirations

- Sustainable growth recognising and protecting the important heritage and natural features of the area
- Engaging with Manu Whenua to progress development of these sites/• Partnership with Māori freehold land owners
- Engagement with iwi and landowners to further understand heritage considerations and implications for development potential

### Encouraging low carbon living

- Existing infrastructure provides potential for this development to be less intensive
- Good transport links provide opportunity to encourage low carbon living
- Location in existing/established communities reduce the need for supporting development - e.g. clustered development.
- New development can use good urban design principles and encourage low carbon living

### Embracing the opportunities of growth

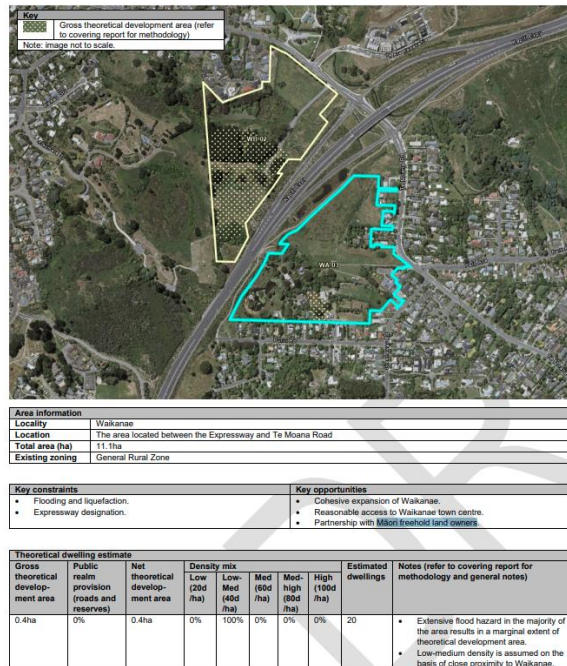
- Providing significant area for development aligning with the regions ambitious housing targets
- Utilising existing services and infrastructure – particularly transport network
- Would be pragmatic in terms of existing utility infrastructure
- Pushes past historically zoning precedents and provides a new opportunity supporting and signalling change and development

# Annexures

## Urban Study WB-03 Area Reference

Kāpiti Coast Urban Development Greenfield Assessment 13/10/2021

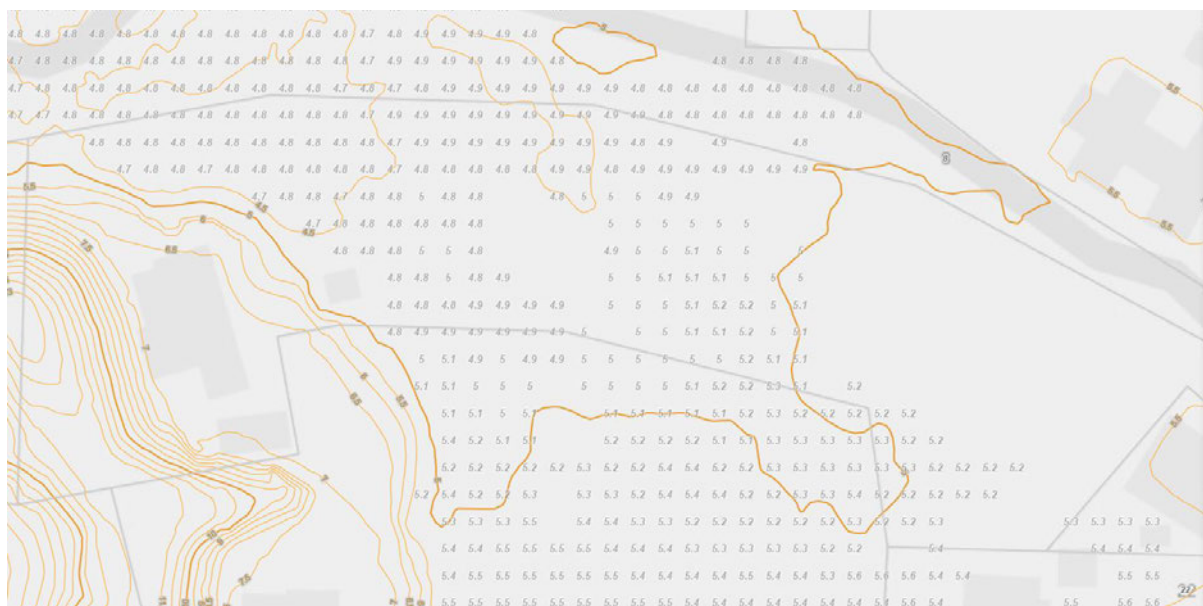
### Future Urban Study Area WA-03



Criteria	Observations	Rating
<b>Mana whenua values</b>	<ul style="list-style-type: none"> <li>The headwaters of the Waimeha to the east of the area are recognised as a site of significant to Te Āhau ki Whakarongotai.</li> <li>There are a number of archaeological sites located throughout the area.</li> <li>The influence Takamore urupā and wāhi tapu site to the west is a significant consideration in terms of development of the area.</li> </ul>	
<b>Iwi development aspirations</b>	<ul style="list-style-type: none"> <li>The central portion of the area is Māori freehold land.</li> </ul>	
<b>Urban form</b>	<ul style="list-style-type: none"> <li>Development of the area would function as a cohesive consolidation of urban form at Waikanae.</li> </ul>	
<b>Local neighbourhoods</b>	<ul style="list-style-type: none"> <li>Development of the area would be an extension of the established neighbourhood at western Waikanae.</li> </ul>	
<b>Activity centres</b>	<ul style="list-style-type: none"> <li>The area has good access to the local centre on the corner of Te Moana Road and Waimea Road, although this requires crossing the Expressway.</li> <li>Development of the area is likely to support the development of the existing local centre.</li> <li>Waikanae town centre is located approximately 3.5km to the east, along Te Moana Road.</li> <li>The nearest schools are at Waikanae to the east.</li> </ul>	
<b>Residential development</b>	<ul style="list-style-type: none"> <li>Extensive flood hazard covering most of the area reduces potential development. Potential to contribute to dwelling supply is marginal as a result.</li> <li>Location within urban Waikanae may encourage the development of a range of typologies.</li> </ul>	
<b>Business land</b>	<ul style="list-style-type: none"> <li>There is no existing business zoned land in the area.</li> </ul>	
<b>Transport networks</b>	<ul style="list-style-type: none"> <li>There is access to the area from Te Moana Road and Greenway Road.</li> <li>The area has immediate access to the Expressway via the adjacent interchange.</li> <li>There is an existing bus route that runs along Te Moana Road.</li> <li>There is reasonable access to Waikanae Station and town centre via active modes along Te Moana Road.</li> <li>Some parts of Te Moana Road include a cycle lane.</li> </ul>	
<b>Infrastructure and servicing</b>	<ul style="list-style-type: none"> <li>Existing water supply trunk and reticulation mains run along Te Moana Road adjacent to the area.</li> <li>Existing waste water reticulation runs along Te Moana Road adjacent to the area.</li> <li>Depending on scale, development in the area may trigger upgrades to the existing waste water plant, and/or pipes and pump stations between the area and the plant.</li> </ul>	
<b>Natural ecosystem values</b>	<ul style="list-style-type: none"> <li>There are no identified ecological sites within the area.</li> </ul>	
<b>Water bodies</b>	<ul style="list-style-type: none"> <li>There is a pond located in the south-western extent of the site.</li> </ul>	
<b>Landscape and open space values</b>	<ul style="list-style-type: none"> <li>There are no identified special amenity landscapes in the area.</li> <li>The area has good access to open space Waikanae Park.</li> </ul>	
<b>Heritage values</b>	<ul style="list-style-type: none"> <li>There are no listed heritage features in the area.</li> <li>There are a number of archaeological sites located throughout the area.</li> </ul>	
<b>Topography</b>	<ul style="list-style-type: none"> <li>The topography of the area is flat towards Te Moana Road, and increasingly hilly towards the Expressway.</li> </ul>	
<b>Natural hazards and land risks</b>	<ul style="list-style-type: none"> <li>The majority of the area is identified as being subject to flood risk. High consequence hazard associated with the flooding of the Waikanae river in this location. Could be a potential 'fatal flaw' for development in this location.</li> <li>The south-western corner of the area is identified as being subject to high liquefaction risk.</li> </ul>	
<b>Land use compatibility</b>	<ul style="list-style-type: none"> <li>A significant portion of the area is covered by the Expressway designation, although this could be reviewed with Waka Kotahi, and is not necessarily a constraint.</li> <li>Development is likely to have reverse sensitivity effects on the Expressway.</li> <li>The natural gas network runs through the western portion of the area.</li> <li>Established rural lifestyle development in the area may be resistant to urban development.</li> <li>The influence Takamore urupā and wāhi tapu site to the east is a significant consideration in terms of development of the area.</li> </ul>	
<b>Highly productive land</b>	<ul style="list-style-type: none"> <li>The eastern half of the area is identified as LUC 1, however it is relatively discontinuous with other potentially highly productive areas.</li> </ul>	
<b>Climate change (low-carbon futures)</b>	<ul style="list-style-type: none"> <li>Consolidation of existing urban form and connecting to established infrastructure services is likely to be less resource intensive.</li> <li>The area has good access to activity centres and regional public transport, with reasonable opportunities for access to these areas by active modes of transport.</li> </ul>	

Notes:  
 \* Feedback on mana whenua values and iwi development aspirations was obtained during the Council Officer workshop on the 19th of July. It is acknowledged that engagement with mana whenua will provide the basis for understanding mana whenua values and iwi development aspirations.

## Site contours and Recommended Build Line (RBL)





Source Kāpiti Coast District Council GIS: Flood Hazards Accessed 22/11/2021

<https://maps.Kapiticoast.govt.nz/LocalMaps/Viewer/?map=4ca9a2e98d134a749c8f4ee4c5f1170f>

### Existing Services Adjoining the site



Source Kāpiti Coast District Council GIS: 22/11/2021



**From:** [Marie Payne](#)  
**To:** [Mailbox - District Planning](#)  
**Cc:** [Paul Turner](#)  
**Subject:** RE: [#LL-3025] Plan Change 2 Submissions  
**Date:** Tuesday, 27 September 2022 2:30:15 pm  
**Attachments:** [image002.png](#)  
[image004.png](#)  
[Plan Change 2 Site Submission 3025.pdf](#)

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Abbey so sorry I noticed a typo in the previously attached I have amended!

Please use the version attached.



**Marie Payne**  
Senior Planner + [Landlink Ltd](#)  
04-902-6161  
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---

**From:** Marie Payne  
**Sent:** Tuesday, 27 September 2022 1:46 PM  
**To:** Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>  
**Cc:** Paul Turner <[paul@landlink.co.nz](mailto:paul@landlink.co.nz)>  
**Subject:** RE: [#LL-3025] Plan Change 2 Submissions

Yes, apologies initially sent a word doc by mistake.

Have just attached the growth plan submission and the relevant attachment – apologies for any confusion. If you just use these docs as the basis for submissions that would be great.

Kind regards,

Marie



**Marie Payne**  
Senior Planner + [Landlink Ltd](#)  
04-902-6161  
[in](#) [f](#) [twitter](#)

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**From:** Abbey Morris <[Abbey.Morris@kapiticoast.govt.nz](mailto:Abbey.Morris@kapiticoast.govt.nz)> **On Behalf Of** Mailbox - District Planning  
**Sent:** Tuesday, 27 September 2022 1:43 PM  
**To:** Marie Payne <[marie@landlink.co.nz](mailto:marie@landlink.co.nz)>; Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>  
**Cc:** Paul Turner <[paul@landlink.co.nz](mailto:paul@landlink.co.nz)>  
**Subject:** RE: [#LL-3025] Plan Change 2 Submissions

Hi Marie

Thank you for clarifying however the only document that is in regards to a submission for 14 Greenaway Road is a Word document which you instructed to be ignored – please see emails attached. Then there is two PDF documents but they appear to be duplicates on one another and they are a submission on the Growth Strategy regarding 14 Greenaway Road. Can you please advise how you would like to proceed?

Kind regards,

**Abbey Morris**  
Planning Technical Support Officer

Kāpiti Coast District Council  
Tel 04 296 4725  
Mobile 027 3037 312

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**From:** Marie Payne <[marie@landlink.co.nz](mailto:marie@landlink.co.nz)>  
**Sent:** Tuesday, 27 September 2022 1:27 pm  
**To:** Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>  
**Cc:** Paul Turner <[paul@landlink.co.nz](mailto:paul@landlink.co.nz)>  
**Subject:** RE: [#LL-3025] Plan Change 2 Submissions

Hi Abbey ,

The Growth Plan attachment is referenced in our submission so we have included it as an attachment – if you could please also confirm receipt of the submission file.

Kind regards,

Marie



**Marie Payne**  
Senior Planner + [Landlink Ltd](http://Landlink Ltd)  
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---

**From:** Abbey Morris <[Abbey.Morris@kapiticoast.govt.nz](mailto:Abbey.Morris@kapiticoast.govt.nz)> **On Behalf Of** Mailbox - District Planning  
**Sent:** Tuesday, 27 September 2022 12:56 PM  
**To:** Marie Payne <[marie@landlink.co.nz](mailto:marie@landlink.co.nz)>; Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>  
**Cc:** Paul Turner <[paul@landlink.co.nz](mailto:paul@landlink.co.nz)>  
**Subject:** RE: [#LL-3025] Plan Change 2 Submissions

Hi Marie

Thank you for showing interest in Proposed Plan Change 2.

The submission that you attached appears to be on the Growth Strategy instead of Proposed Plan Change 2. Just wanting to double check that the correct document has been attached to your email? If you are meaning to submit on Plan Change 2, this will need to be clarified within your submission.

Kind regards,

**Abbey Morris**  
Planning Technical Support Officer

Kāpiti Coast District Council  
Tel 04 296 4725  
Mobile 027 3037 312

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**From:** Marie Payne <[marie@landlink.co.nz](mailto:marie@landlink.co.nz)>  
**Sent:** Thursday, 22 September 2022 3:18 pm  
**To:** Mailbox - District Planning <[District.Planning@kapiticoast.govt.nz](mailto:District.Planning@kapiticoast.govt.nz)>  
**Cc:** Paul Turner <[paul@landlink.co.nz](mailto:paul@landlink.co.nz)>  
**Subject:** [#LL-3025] Plan Change 2 Submissions

Kia ora,

Please find attached submissions in relation to Proposed Plan Change 2. If for any reason there is an issue with the submission or the information provided please let us know immediately.

Kind regards,

Marie



**Marie Payne**  
Senior Planner + [Landlink Ltd](https://www.landlink.co.nz)  
04-902-6161  
[in](#) [f](#) [twitter](#)

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