OIR: 2526/58

26 August 2025

Tēnā koe

Request for Information under the Local Government Official Information and Meetings Act 1987 (the Act) (the LGOIMA)

Thank you for your email of **12 August 2025** requesting the following information:

(A) The design report for the proposed development at 16-20 Eruini Street
(B) The application of the appropriate design guides, ie residential and development Guides.

Please find the information requested within the documents attached.

Ngā mihi,

Kris Pervan
Group Manager Strategy and Growth
Te Kaihautū Rautaki me te Tupu

Please note that any information provided in response to your request may be published on the Council website, with your personal details removed.

URBAN DESIGN ASSESSMENT

16, 18 AND 20 ERUINI STREET, WAIKANAE

PREPARED FOR PALMER AND COOK

APRIL 4 2025

URBANEDGE
PLANNING LTD

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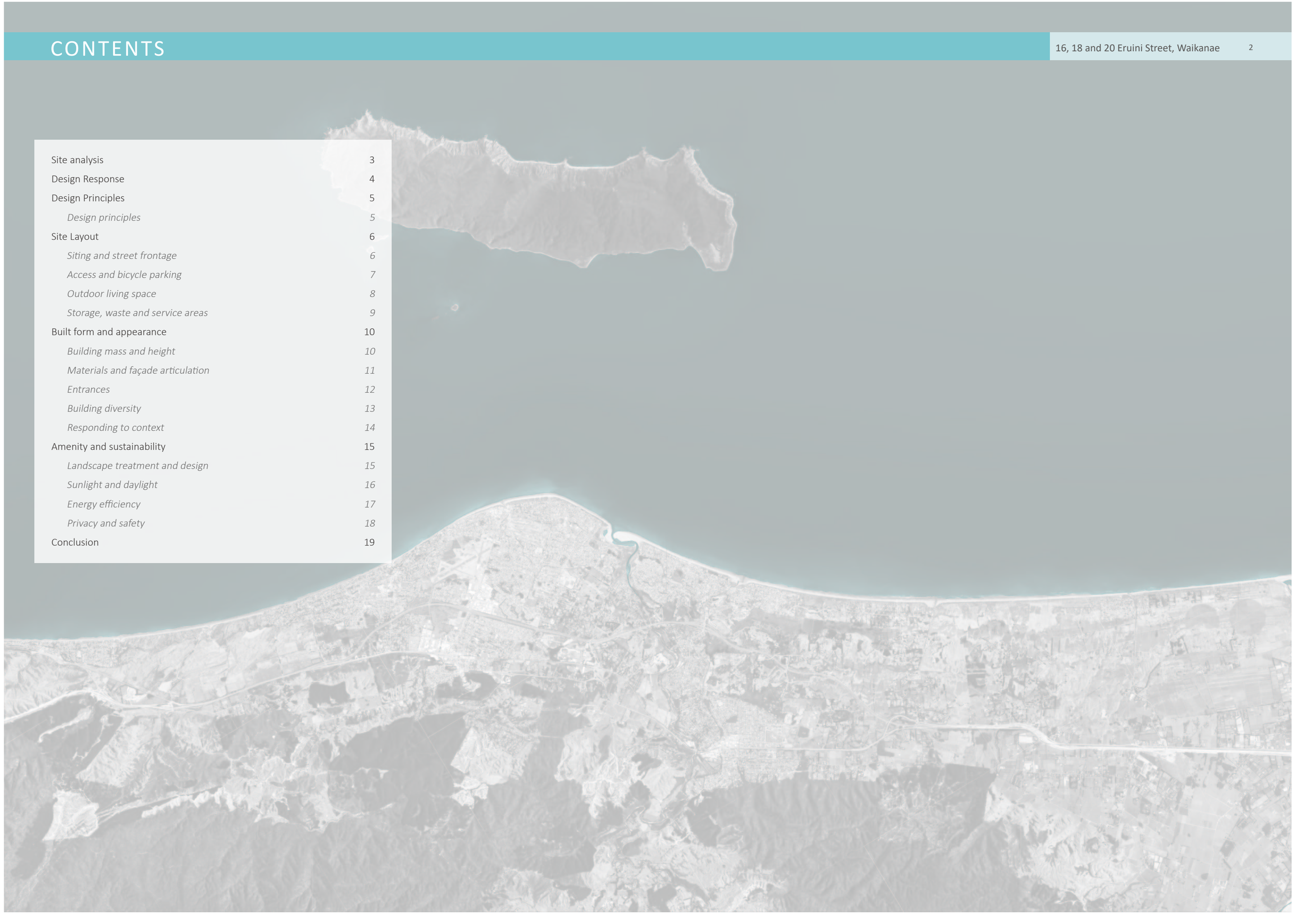
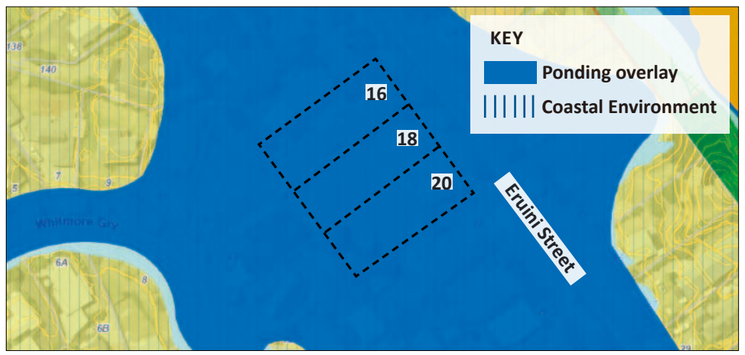


SITE ANALYSIS

Key points about the site

- The application site at 16, 18 and 20 Eruini Street (Lots 33 DP 26719, 32 DP 26719 and 31 DP 26719) has a total area of 2,427m^2.
- The site is zoned as General Residential Zone.
- The site is located within a flood hazard ponding overlay, and is within the coastal environment overlay.
- There is no noteworthy vegetation within the site, with a majority of the site being residential in nature with limited vegetation cover. A small collection of trees to the front and rear of 20 Eruini Street are proposed to be removed.
- There is an existing stand-alone dwelling, a set of flats, a garage structure, a shed, fencing, and a small amount of vegetation to be removed. The dwelling at 18 Eruini Street was previously removed, with the site currently in pasture.
- The site is adjoined by four residential lots to the southwest, one residential lot to the northwest, and one residential lot to the southeast.
- The site topography is relatively flat, as is the surrounding environment.
- There are views towards Kāpiti Island from the second storey of 20 Eruini.
- The proposal includes:
  - » Earthworks to create a platform suitable for development above the flood hazard level;
  - » The addition of 17 residential units; and,
  - » The addition of a centralised carparking area.
- The site is not in close proximity to key facilities, so some reliance on vehicle use is expected. The site is 140m (2 minute walk) from the nearest bus stop at the end of Eruini Street on Tutere Street. This bus service connects with the Waikanae train station, which is over 5km away.
- The site is well connected to local recreation areas, with Waikanae Beach, a playground and 2 reserves all within easy walking distance to the site.
- The subject site is 5km from the Waikanae town centre, which has a supermarket, cafés, cinema and medical centre.

Context plan showing site zoning and local amenity



Flood hazard ponding and coastal environment overlays

Views oto the west towards Kāpiti Island from 20 Eruini Street balcony, with 16 Eruini flats in the foreground.

Existing site frontage as viewed from Eruini street

Views to the south towards the hills from 20 Eruini Street balcony, with 22 Eruini Street in the foreground.

Natural Open Space Zone
Rural Zone

Key points about the design

- The 17 Units are divided into the following typologies:
  - Units 1-4 are a four-bedroom, two-storey, duplex typology, with access and outdoor areas facing the street, and garage access from the rear.
  - Unit 5 is a two bedroom, two-storey, stand-alone typology with outdoor area and living on the upper level and secondary ground-level outdoor living space to the rear from the bedrooms.
  - Units 6-7 are a two bedroom (Unit 7) and three-bedroom (Unit 6), two-storey, duplex typology with outdoor area and living on the upper level, and secondary ground-level outdoor living space to the rear from the bedrooms.
  - Units 8-10 are a two bedroom, two-storey, triplex typology with outdoor area and living on the upper level, and secondary ground-level outdoor living space to the rear from the bedrooms.
  - Units 11-14 are a two-bedroom, two-storey, terrace typology (block of 4) with living at ground-level and outdoor areas and access to the frontage, with services to the rear.
  - Units 15-17 are a two-bedroom, two-storey, triplex typology with living at ground-level and outdoor areas and access to the frontage, with services to the rear.
- All units will include one allocated carpark with the exception of Unit 6. Units 1-5 have carparks within garages, and Units 7-17 within the central carpark. Unit 6 will rely on street carparking.
- The following non-compliances that relate to urban design are discussed below:
  - » Building coverage is compliant at 42.86% based on net site area but becomes non-complying at 61.60% when excluding the access lot. After subdivision, Lots 1-13 and 16 will exceed 50% coverage, ranging from 53-72%. However, this does not impact the usability of outdoor living areas, which remain functional, separate from services, and include positive outlooks, with Units 5-10 having additional secondary outdoor spaces.
  - » All units, comply with setback standards both with regard to external site boundaries, and internal yards.
  - » The permeable area is compliant on a site wide basis, but not on a per lot basis. Whilst Units 1-5,7-9, 12,and 16 have non-complying permeable areas, this is balanced across the site by the permeable surfaces used within the shared carparking area.
  - » Most units have compliant outdoor living areas, except for Units 5, 6, 9, 11-13, and 16, which range from 8.92m² to 19.09m². Each unit accommodates outdoor furniture, is separated from services, and ground-level areas include planting for amenity and screening. Units 5, 6, and 9 utilise upper-level outdoor spaces for outlook and privacy, with additional ground-level areas accessible from bedrooms or side yards, providing additional outdoor amenity.
  - » Most units comply with the 4m x 4m outlook space requirement, except for Units 5, 6, 12, 13, and 16, which slightly extend across new internal boundaries to achieve the required width.
  - » The landscape area is compliant on a site wide basis at 20%.

GROUND-LEVEL Site plan showing dwelling typologies

UPPER-LEVEL Site plan showing dwelling typologies

GROUND-LEVEL Site plan showing non-compliances

KEY: OUTDOOR LIVING

- Primary ground-level
- Primary upper-level
- Secondary ground-level

KEY: NON-COMPLIANCES

- Building coverage
- Outdoor areas
- Permeable areas
- Outlook areas

Multi-Unit standards compliance

Compliant	Not Compliant	Not Relevant		
	●		***GRZ-R1***	*Permeable surfaces*
●			***GRZ-R33 Standard 2***	*Building Height*
●			***GRZ-R33 Standard 3***	*Height in relation to boundary*
●			***GRZ-R33 Standard 4***	*Setbacks*
	●		***GRZ-R33 Standard 5***	*Building Coverage*
	●		***GRZ-R33 Standard 6 & 7***	*Outdoor Living Space*
	●		***GRZ-R33 Standard 8***	*Outlook space*
●			***GRZ-R33 Standard 9***	*Windows to street*
●			***GRZ-R33 Standard 10 and 11***	*Landscape area*

DESIGN PRINCIPLES

Provided	Not Provided	Not Relevant	Provide for variety and choice
●			*Ground floor uses contribute positively to the street and public realm*
		●	*Provide opportunities for residential activities which are successfully integrated with commercial use*
●			*Provide for a range of dwelling sizes and types*
●			*Provide clear definition between public and private spaces, and clear building entrances*

Provided	Not Provided	Not Relevant	Integrate with public realm and surroundings
		●	*Improve connectivity to town centres and local public spaces by creating through-site walking and cycling links where possible*
●			*Respond to the surrounding environment and open-up developments to front public spaces and amenities*
●			*Consider the existing environment (built and natural) when designing to the anticipated level of residential intensification*
●			*Consider the potential for development on neighbouring sites*
●			*Provide for passive surveillance of the public domain through windows and building orientation*

Provided	Not Provided	Not Relevant	Provide appropriate built form and design
●			*Achieve bulk, massing, and scale appropriate to the anticipated design patterns of the surrounding neighbourhood*
●			*Use design features such as modulation, articulation, building materials, and colour, to integrate the built form into the surrounding area and provide visual interest*
●			*Ensure built form and design enables accessibility that provides for the day-to-day living and needs of future residents*

Provided	Not Provided	Not Relevant	Create a comfortable and safe environment
	●		*Provide accessible external and internal design that caters for people of all ages and abilities*
●			*Provide amenity through a balance of green, private and communal spaces*
●			*Orientate outdoor living spaces and buildings to maximise solar benefits*
●			*Provide for housing that serves the needs of different communities, ages, budgets and lifestyles*

Render of development as viewed from the street

Design principles

Variety and Choice

Overall the site is effectively meeting the design principles. Variety and choice is provided with a range of dwelling options and typologies across the site, providing two, three and four bedroom options, with variation in open carparking and internal garaging. Living rooms are located on the ground-floor for Units 1-4 and 11-17 to increase ground-level open space and connection to the street, and on the upper-level for Units 5-10 to capitalise on views to the street and Kāpiti Island. Clear definition is provided between the private and public realms along the street edge, with a retaining wall and low semi-permeable fencing defining the boundary, with a hedge utilised to screen the retaining walls from the street.

Integration

The buildings are effectively integrated with the public realm and wider surroundings. The site is in a residential area, however does provide an increased level of intensification when compared to the direct surrounding neighbourhood character. Development within the region is however increasing, with several infill developments and the Harakeke Heights development adjacent the Waikanae golf course which provides a similar level of intensification.

The site design appropriately addresses the public street. The frontage of the units is raised to ensure that the finished floor level sits above the flood hazard heights. This separation in height has the benefit of allowing the front facing outdoor areas to sit above the level of the footpath, increasing privacy, without preventing passive surveillance, allowing for lower fence heights and a better visual connection with the street. The design ensures the retention of the existing street tree, to help preserve some of the established character of the neighbourhood. The garage doors have been positioned to the rear of Units 1-4, and are accessed from the shared carpark to minimise any additional vehicle dominance adjacent the street, with Unit 5 being the only unit with an integrated garage that faces the street.

Appropriate Built form and Design:

The development achieves an appropriate built form and design that effectively integrates with the surrounding environment. Variety is provided with a varied material and colour palette, and modulated building forms that create visual variety and provide a sense of human-scale at ground-level, while accentuating the front accesses.

A Comfortable and Safe Environment

A safe and comfortable environment is provided, with well-positioned private outdoor areas that receive good levels of sun access and privacy. While the units are not fully mobility friendly due to their two storey form, Units 1-4 and 11-17 are however mobility friendly for visitors, as they have an at-grade entrance (Units 1-4 from the rear via the garage, and Units 11-17 via the frontage), and have living and a separate WC at the ground-level.

Siting and street frontage

The configuration of a development on a site and its relation to adjoining public space is an important consideration to ensure good amenity and reduce overshadowing and privacy effects on adjoining sites. Having a defined front and back, as well as a clear delineation between public, semi-public and private spaces contributes to the legibility of the site and street. The setback and frontage of a building also contribute to socially active and safe environment, while the front yard provides additional amenity for residents and a setting for the dwelling.

Units 1-5 face Eruini Street, with their front doors clearly visible from the street. They are stepped back from the street to better integrate into the neighbouring environment and allow space for sunny northeast facing outdoor areas.

The access to the garages is located to the rear to minimise vehicle dominance adjacent the street, and provide a positive connection at the frontage that promotes pedestrian safety. The carparking for the rear units is also consolidated in a central area within the site, that is screened from the street by Units 1-4. This ensures that there are only two vehicle crossings crossing the public footpath, which results in one less crossing than the existing condition, minimising pedestrian and vehicle conflict points along the frontage.

The raised finished floor level and retaining structure at the street frontage provides separation between the public and private interfaces; providing a clear delineation between these spaces and allowing residents to look out and over to provide passive surveillance, while minimising direct views in. The fencing on top of the retaining structure has been kept low and semi-permeable to create a positive relationship to the street, and climbers are used for visual screening and softening along the frontage.

The existing street tree, is retained which assists with visually integrating the development into its surroundings.

A high-level of glazing is provided on the front façades of the proposed units, with a variety of claddings and modulations, which create a visually interesting frontage that has good passive surveillance and sense of human-scale.

Site map showing outdoor living areas, passive surveillance and entrances

Street view from the north of Unit 5, entrance stairs staggered to allow for raised floor-level requirements, raised planting used to create a welcoming entrance without blocking visibility of the front door.

Street frontage glazing - Units 1-4 28.13% and Unit 5 22.12%

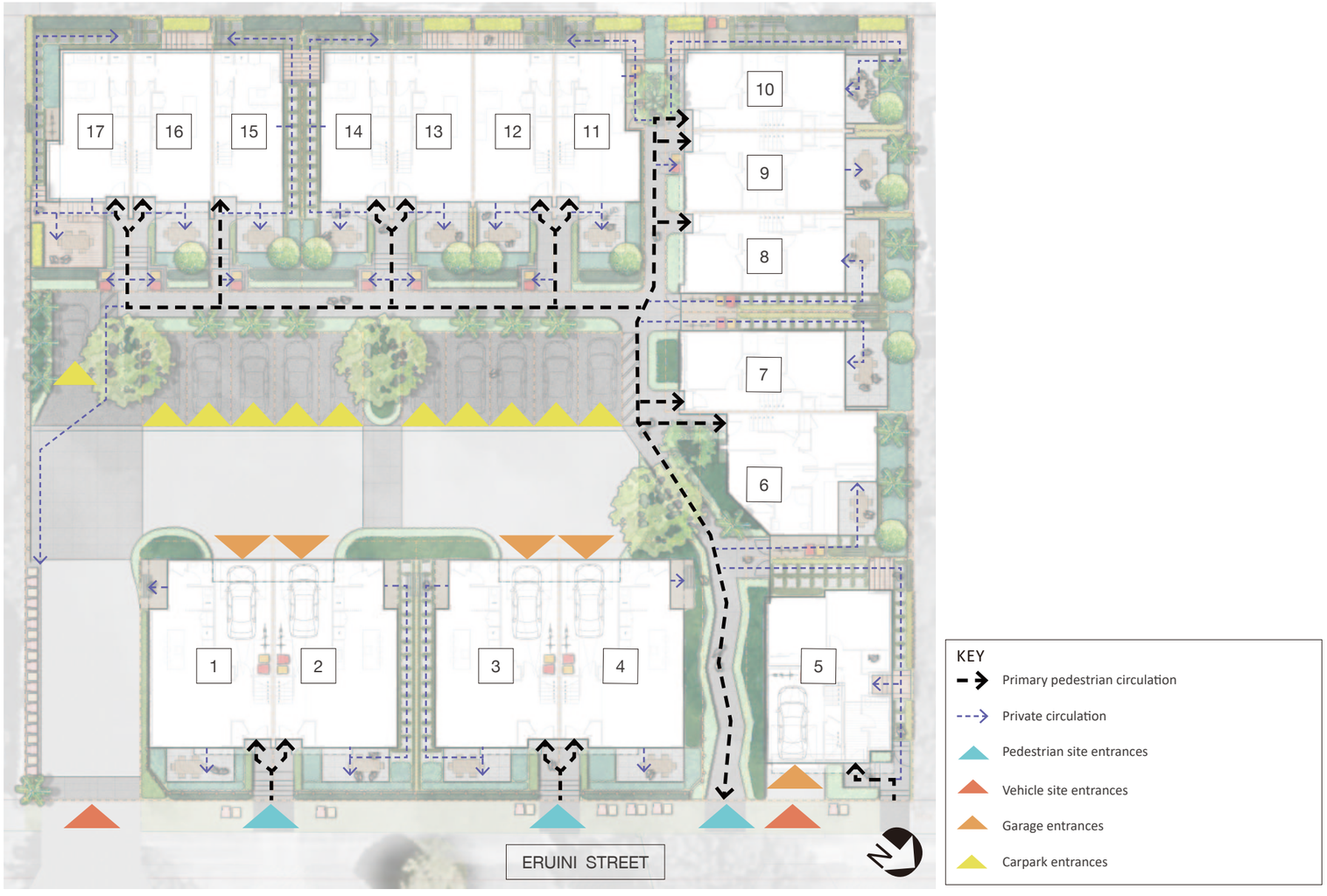
Provided	Not Provided	Not Relevant	*Design Guidelines*
●			**G01.** Buildings oriented toward the street/s or public space.
●			**G02.** Habitable spaces overlooking the street or public space.
●			**G03.** Clearly defined public, semi-public and private spaces.
●			**G04.** Interface of outdoor living spaces at the street or other public spaces
●			**G05.** Taller fences at 50% visual permeability for passive surveillance.
●			**G06.** Upper-level setbacks and creation of human scale.

Access and bicycle parking

The location, type and design of pedestrian and vehicle access can have a significant bearing on the streetscape, site layout and building design.
Circulation networks should be legible and provide a safe environment for pedestrians and cyclists.
Garages should be sensitively integrated into any development as they can have a significant impact on its overall layout and design as well as on the associated streetscape.
Considering alternative modes of transport and maximising opportunities for cyclists (e.g. bicycle parking) can also help ease pressure on car parking. A lack of sufficient bicycle storage opportunities can result in clutter and inconvenience for residents, which can detract from the amenity and usability of the development.

The location, type and design of pedestrian and vehicle access has been considered from an early design stage.

- The main pedestrian circulation network is fully separated from the vehicle access and carparking area to minimise pedestrian and vehicle conflict points, with the pedestrian access to the street located between Units 4 and 5, and the access located along the southeastern boundary.
- The roading design reduces vehicle speeds and enhances pedestrian safety with the use of contrasting surfaces and vegetation.
- Garages are positioned to the rear of Units 1-4 to minimize vehicle dominance on the street.
- Unit 5 is the only unit with a garage addressing the street. The garage is integrated into the dwelling form, with the balcony protruding above to visually recess the garage into the dwelling form, and high levels of glazing on the remainder of the façade to provide an inviting frontage.
- All units have a dedicated service area (with the exception of Unit 9) which has space to securely store a bike, which supports the use of alternate transport modes. However, residents of mid-block Units 12, 13, and 16 will need to carry bicycles through the dwellings to access these service areas.



Site map showing pedestrian and vehicle circulation and access

Provided	Not Provided	Not Relevant	*Design Guidelines*
●			**G07, G08.** Bicycle storage, security and functionality.
●			**G09, G10, G11, G12.** Open carparks, screening and softening.
●			**G13, G14, G15, G16.** Safe and prioritised pedestrian access.
●			**G17.** Safety.
●			**G18, G19, G20.** Garaging and on-site parking.

Street fronting garage of Unit 5

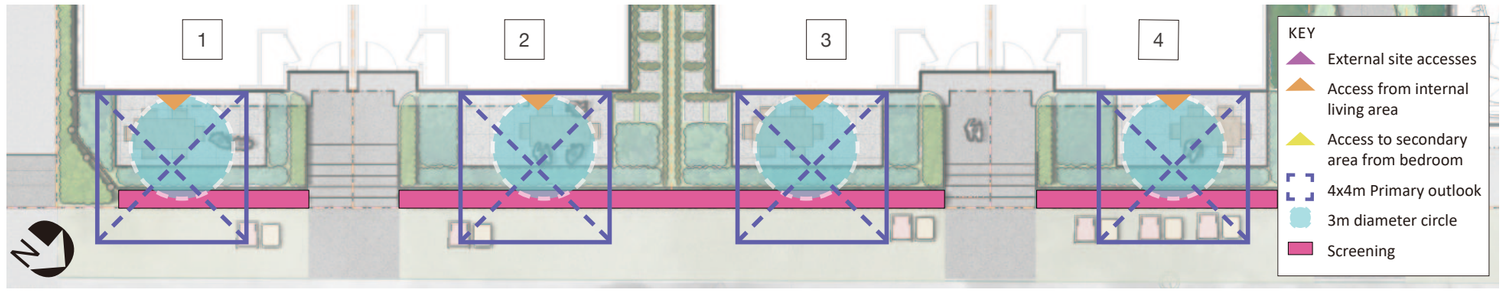
Rear carpark facing garages of Units 1-2 (and 3-4)

Outdoor living space

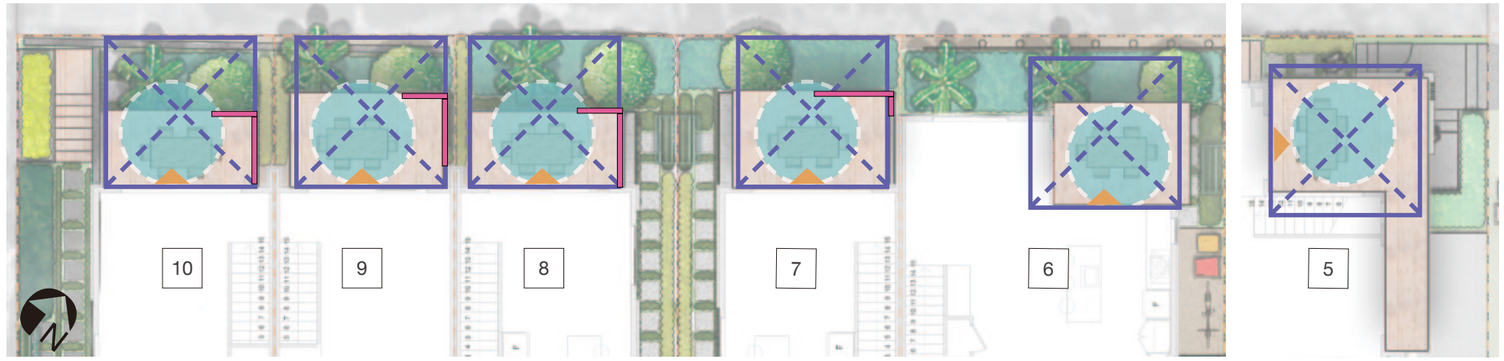
Outdoor living space is an important consideration when designing intensive residential developments and should be considered early on in the design process to ensure it is an integral part of the development.

Higher densities often result in a reduction in the amount of outdoor space available to residents, influencing the sense of privacy and level of individual amenity experienced. Outdoor space allows residents to be able to enjoy a range of activities, express personal and creative identity around their property and, in the case of communal open space, provide for casual social interactions.

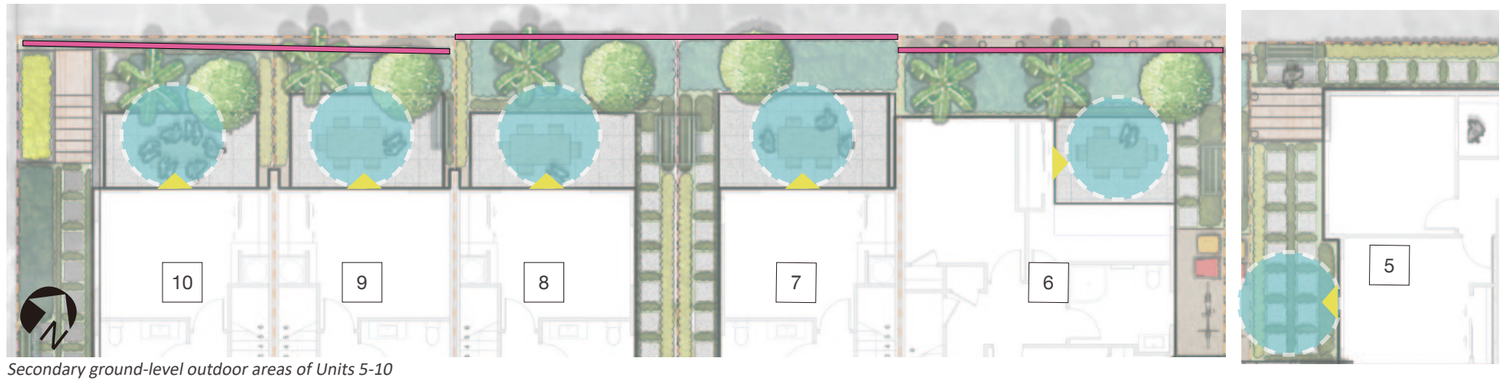
- Every dwelling will be provided with outdoor living areas that directly connect to internal living areas, and all are oriented northeast or northwest for sunlight access.
- Units 1-4 have ground-level outdoor areas adjacent the street, that are raised up from street-level. A hedge is proposed between the boundary treatment and public footpath to screen the retaining and improve privacy for the outdoor areas. This solution allows for views out and over the hedge towards the street, providing positive passive surveillance while retaining some privacy.
- Units 5-10 utilise upper-level outdoor living to capitalise on outlook and privacy, and have the benefit of secondary ground-level outdoor areas accessed from the bedrooms and/or side yards.
- Units 11-17 have ground-level outdoor areas adjacent the street, that are raised up from street-level. A hedge is proposed between the boundary treatment and public footpath to screen the retaining and improve privacy for the outdoor areas. This solution allows for views out and over the hedge towards the street, providing positive passive surveillance while retaining some privacy.
- The outdoor living area sizes are generally compliant, with the exception of Units 5, 6, 12, 13 and 16. These units are slightly below the required 20m², ranging between 18.18m² and 19.09m² in size. Each unit does however have space for outdoor furniture, are fully separated from services, and for the ground-level areas, have a small area of planting both within the site, and adjacent the boundary along the pedestrian path, to provide amenity and screening.



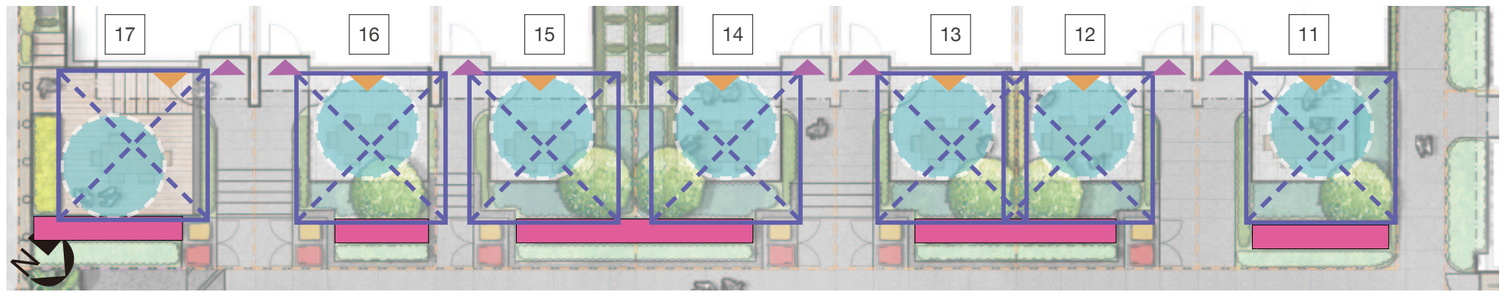
Primary outdoor areas of Units 1-4 that face the street - screening provided from street by hedging, raised outdoor areas and low balustrade



Primary upper-level outdoor areas of Units 5-10 - 1.6m screens utilised to a portion of the decks to minimise overlooking and direct views away from the adjacent building and towards Kāpiti Island.



Secondary ground-level outdoor areas of Units 5-10



Primary ground-level outdoor areas of Units 11-17

Provided	Not Provided	Not Relevant	Design Guidelines
●			**G21.** Direct connection from internal to external living areas.
●			**G22.** Balconies provided where ground-level outdoor living is not possible.
		●	**G23.** Roof-top open space.
●			**G24.** Privacy and sunlight amenity.
●			**G25.** Functional size and location.
●			**G26.** Screening.
		●	**G27.** Communal outdoor living spaces.
●			**G28, G29.** Screening of balconies.

Storage, waste and service areas

Integrating storage, waste and service areas into the overall site design can have a beneficial effect on the amenity and quality of a development. Considering how waste is managed, stored and collected, as well as the location of storage and service areas, helps to minimise visible clutter that could create lower standards of amenity and poorer impressions of an area.

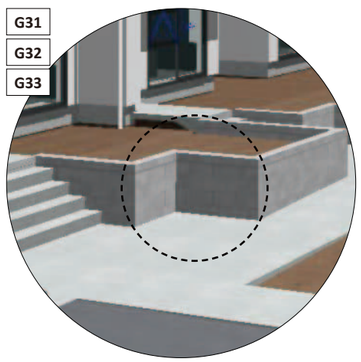
Service areas are designed for functionality and minimal visual impact, with refuse, bike storage, and clotheslines integrated throughout the site.

Waste collection will be private, and collected from the berm of Eruini Street for Units 1-8 and from the edge of the driveway for Units 9-17. Waste will be stored privately within each site. This will be within the garages for Units 1-5, within the side service yards for Units 6-8 and 10-11, and within screened refuse boxes integrated into the frontages of Units 9 and 12-17. This provides at-grade access between the storage and collection areas without needing to navigate stairs, for all units except Unit 10, which will need to navigate a small stairwell to the sideyard.

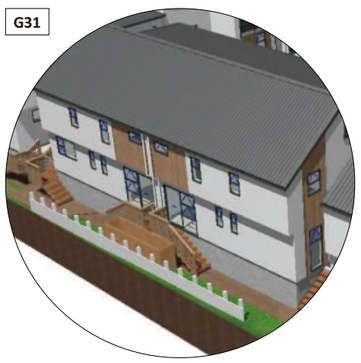
Clotheslines are located within the side or rear yard of each unit, screened by 1.8m solid or semi-permeable fencing, and separated from the primary outdoor areas. There is space for a bike to be stored within the garages of Units 1-5, and within the side or rear service areas of Units 6-8, 10-11, 14-15 and 17, which are secured by lockable gates. Units 9,12,13 and 16 do not have dedicated bike storage.

Provided	Not Provided	Not Relevant	*Design Guidelines*
	•		**G30.** Consider providing outdoor space for the storage of recreational or maintenance equipment, or other large household items. Outdoor storage space should be proportionate to the size of the dwelling.
•			**G31.** Ensure that waste and service areas do not restrict on-site pedestrian or vehicle movement, create potential health and safety hazards, or create nuisances for adjacent dwellings or outdoor living spaces.
•			**G32.** Integrate waste and storage areas into the building design and ensure that they are of a sufficient size relative to the number of units.
•			**G33.** Waste areas should be able to accommodate all waste bins and be directly accessible to the collection area.
•			**G34.** Position storage and service areas in locations that are obscured from public view.
•			**G35.** Areas set aside for wheelie bins or rubbish storage and collection should be integrated into the development in a way that is visually discrete and be located away from commonly used areas to prevent the impact of odour or leakage. On sites where access to the side or rear of a dwelling is limited, locating the rubbish storage area to the front of the site may be appropriate where visibility from the street is mitigated by appropriate landscaping or screening.
	•		**G36.** Communal storage spaces should be accessible from common circulation spaces such as hallways or laundry rooms.

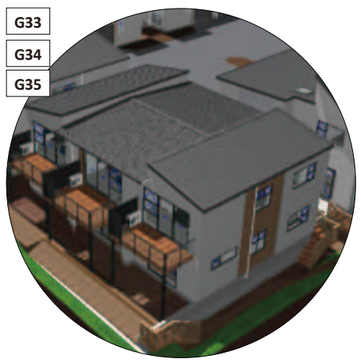
Site map showing pedestrian and vehicle circulation and access



Retaining walls are cut in to allow for at-grade refuse storage within screened bin areas at the frontage of Units 11-17



Service areas with screened space for clotheslines to the rear of Units 11-17



Service areas to side and/or rear for Units 6-10 at ground-level, with primary outdoor areas separated above

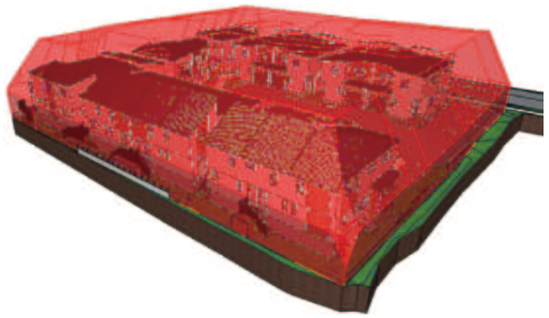
Refuse boxes at frontage for Units 9 and 10-17 to provide screening to waste while maintaining easy accessibility to the collection areas

Building mass and height

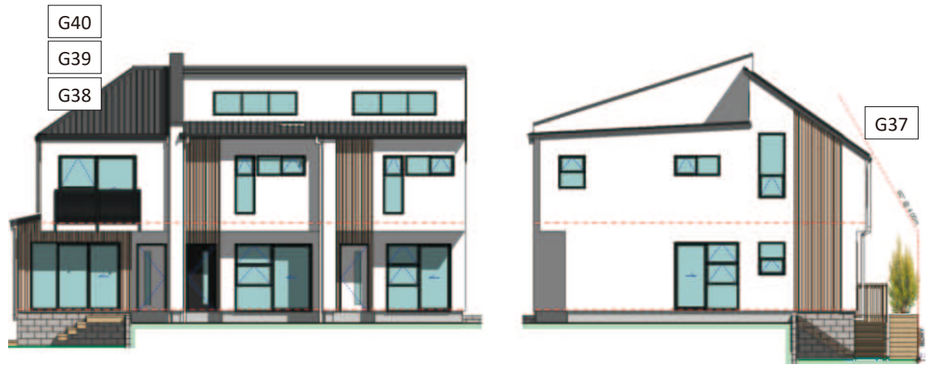
Building height contributes to achieving more intensive residential development as it can enable more effective utilisation of a site while maintaining a low footprint. A visually attractive design can help to mitigate any potential adverse effects arising as a result of building mass and height. In Kāpiti Coast a pattern of single dwellings on individual sites predominate. In light of the increased level of intensification anticipated by the District Plan it is important that the layout and form of any new, larger scale development considers its context and its relationship with the surrounding environment.

The development has been designed to be visually appealing while minimising building bulk and dominance. The layout and form have been carefully considered in relation to the site context and surrounding environment. The design integrates with the receiving environment through the following:

- Appropriate Building Scale – All dwellings are two-storey, with each block maintaining a similar level of bulk to the surrounding predominantly stand-alone dwellings.
- Compliance with Height and Recession Planes – The proposed dwellings adhere to all height and recession plane requirements, ensuring an expected level of bulk, dominance, and shading across the site.
- Strategic Buffering and Screening – Outdoor areas are positioned to the northwest, vehicle access to the southeast, and service areas with vegetative screening along the southwestern boundary, minimizing potential impacts on neighbouring properties. The southwestern boundary also has an angled roofline to minimise shading impacts to these adjacent neighbouring properties.
- Broken up Block Lengths - To provide visual relief and be more sympathetic to the established building patterns, noting that the District Plan enables intensification.



Indicative compliance tent perspective showing compliant building height and recession planes



Northeastern and northwestern elevations of Units 15-16 showing modulated roof form to minimise shading effects on the neighbouring properties while increasing sunlight access to the rear bedrooms of these units. This technique is also used for Units 11-14.

Perspective showing building scale, buffers, articulation, modulation, roof pitch variation, and variance in typologies

Provided	Not Provided	Not Relevant	*Design Guidelines*
●			**G37.** Building mass and height should be designed to: A. Create visual interest; B. Minimise physical dominance; C. Minimise potential shading or privacy effects on neighbouring sites.
●			**G38.** To minimise the effects of physical dominance, consider: A. Breaking the form of the building up into a 'podium' and 'upper stories'; B. Stepping the upper stories back from the street; C. Introducing variations in façade treatment (e.g. through balconies, shading devices or porches); D. The effective use of landscaping.
●			**G39.** Reduce the effects of building mass by integrating the roof form with the design of the upper storey.
●			**G40.** Reduce the effects of building mass by introducing variation into the roof line.
●			**G41.** To reduce visual monotony long linear or blank walls without windows, doors or associated design features should be avoided.
		●	**G42.** Consider increasing building height on corner sites, where this would create a focal point that supports visual interest, legibility and wayfinding.

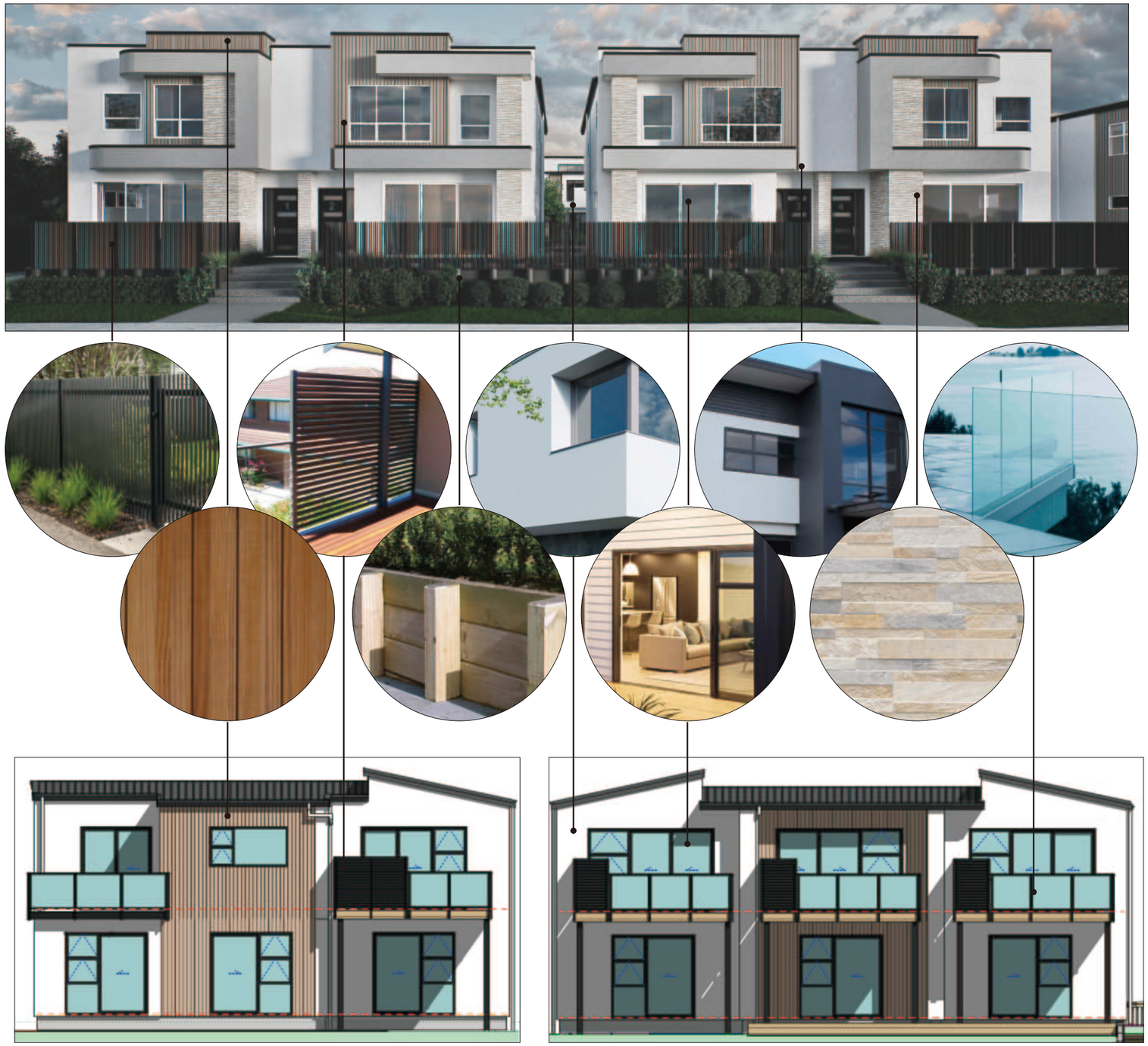
Materials and façade articulation

Building design and use of materials make an important contribution to the effective integration of higher density residential development into the street environment. The main factors that influence the appearance of a building are scale, modulation and the articulation of its form and façade. The choice of materials used can also affect the appearance of a development, how well it performs and endures over time and its ongoing sustainability and resilience.

Scale, modulation, and façade articulation have been carefully considered and incorporated through the following design elements:

- Varied Materials and Colour Palette – The buildings feature a mix of Specialized EZPanel, Specialized EPS, Abodo Vulcan Shiplap, Stone Veneer, and Porcelain Tile on compressed sheet, creating visual and textural variety. These durable materials ensure a high-quality finish throughout the buildings' lifespan.
- Decorative Semi-Permeable Fencing – Oblique semi-permeable fencing is used at frontages facing shared or public spaces, adding dimension and human scale while allowing sunlight penetration, reducing bulk, and promoting passive surveillance.
- Modulation and Depth – Building insets, awnings, eaves, and setbacks introduce depth and variation, breaking up the mass of the buildings.
- Emphasis on Frontages – The most diverse material palette and modulation techniques are concentrated on the most visible façades, particularly those facing the street, enhancing their visual interest and integration into the streetscape.
- Varied Rooflines – The development features modern and diverse roof forms, including mono-pitch roofs with feature parapets along the street, as well as a mix of skillion and angled roofs. These variations minimize impacts on neighbouring properties while providing visual interest and uniqueness across each block.

Provided	*Not Provided*	*Not Relevant*	*Design Guidelines*
●			**G43.** The design, type and location of the building on a site as well as the choice of materials used, should recognise and reflect the level of intensification planned for the surrounding area. Including setback from the street, scale and bulk, roofline, complementary materials and colours, planting, and presence of distinct character or built heritage in the surrounding environment.
●			**G44.** Building features and elements should be integrated and considered as part of a single, coherent design.
●			**G45.** Consider lighting and signage elements as an integral part of the design.
●			**G46.** Consider views of the rear and side façades of the building, particularly where there is a transition to a lower density environment.
		●	**G47.** Consider increasing the visual prominence of buildings on corner sites through the use of different materials, colours or roofline.
●			**G48.** Use robust materials that are easy to maintain and retain their long term appearance. This is particularly important in areas that are prone to increased wear such as communal spaces.



Render of the frontage of the street facing units, and the rear of Units 6-10 with the material palette utilised across the development

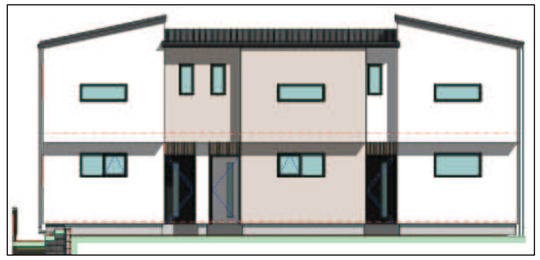
Entrances

The entrance to a building makes an important contribution to the way a building is experienced. Balconies and entrances provide visual interest by breaking up a façade; they also add a human scale to intensive residential developments and can positively contribute to the overall appearance of a building when designed well. Visible activity on the ground floor and street facing façade enhances public safety through passive surveillance and creates opportunities for social interaction.

Balconies also offer a good way of providing outdoor living space on a street facing façade and contribute to reducing the effects of building mass.

- Entrances are clearly defined, enhancing both visual interest and functionality. Ground-floor activity and street-facing façades promote passive surveillance and social interaction. Welcoming front awnings contribute to building articulation, provide shelter, and strengthen community connections while emphasizing entry points.
- Each unit has its number displayed near the front door, with integrated sensor lighting in the porch for night-time safety and accessibility. Letterboxes are positioned along the Eruini Street frontage and at the pedestrian entrance near Unit 5 for rear units.
- Dwellings are oriented toward Eruini Street or, secondarily, pedestrian accessways and open parking areas. The pedestrian path adjacent to Units 4 and 5 provides a clear sightline to the rear units, ensuring safe, vehicle-free access.
- Each frontage features distinct variations in cladding, articulation, modulation, and fenestration, enhancing legibility and providing a unique identity for each dwelling.

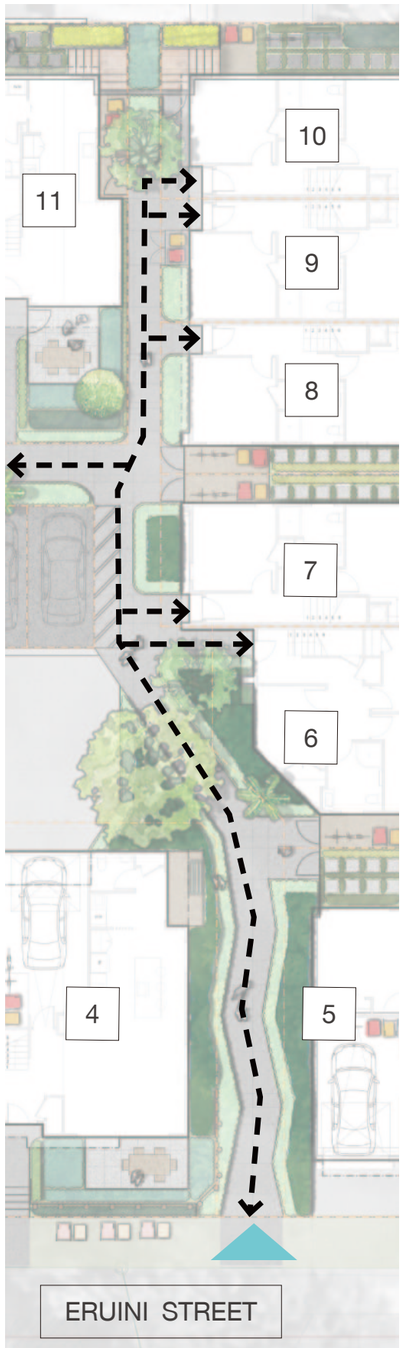
Entrances to rear units as visible from the shared carpark area



Entrances to Units 8-10 at end of pedestrian spine

Entrances to Units 6 and 7 along the pedestrian spine

Streetscape entrances of Units 1-4 showing glazed portions in front doors, clear and legible units numbers, wide shared front entrance paths that are softened by planting



Pedestrian spine providing access to rear units

Provided	Not Provided	Not Relevant	*Design Guidelines*
●			**G49.** Consider subtle variation to entrances (e.g. colour, design), or enable occupants to personalise in order to differentiate units and increase legibility.
●			**G50.** Ensure entrances (as well as address and letterbox) are clearly defined and visible from the street to enable them to be easily located and accessed.
		●	**G51.** Entrances that serve high density development should provide sufficient space for people to gather (e.g. entry plaza) and include signage and landscape treatment that enhances the legibility of the entrance location. Indoor lobby spaces should have a clear visual and physical connection to the street.
●			**G52.** Entrances should be designed to provide all weather shelter (e.g. canopies or overhangs) with suitable lighting incorporated into the design.

Building diversity

Providing diversity of dwelling type and size offers increased accommodation choice catering to a variety of needs ranging from income level and household size through to demographic and cultural requirements. Units that appeal to a broad range of ages and stages are also more likely to withstand significant changes in the market. Additionally, diversity provides improved opportunities for existing residents to move within their local community as and when their housing needs and requirements change.

The development of apartments or multi-unit housing can be an effective way of achieving higher density while retaining sufficient space for outdoor use, particularly on sites with size constraints.

- The development offers a diverse mix of dwelling types and sizes, including two, three, and four-bedroom options with a variety of layouts such as stand-alone, duplex, and terraced homes. Some units feature open parking, while others have garages, with a mix of upper and ground-level living spaces to accommodate different needs. This diversity enhances community variety and supports a range of residents.
- All units have spacious open-plan living areas for flexible use, and every dwelling includes at least two bedrooms, allowing additional rooms to serve as a study, craft room, guest space, or playroom as needed.

Site plan showing two-bedroom (pink) three-bedroom (purple) and four-bedroom (red) typologies

Site plan showing units with garaging (orange) open-parking (yellow) and street-parking (red)

Site plan showing upper-level (light blue) and ground-level (dark blue) indoor and outdoor living

Site plan showing stand-alone (yellow), duplex (light green), and terraced typologies (dark green)

Design Guidelines

Provided	*Not Provided*	*Not Relevant*	
●			**G53.** Consider providing a variety of dwelling sizes and types to cater for a range of financial, demographic or accommodation needs.
●			**G54.** Consider developing buildings that are adaptable and that can be flexibly used or reconfigured over time without the need for major change.

Responding to context

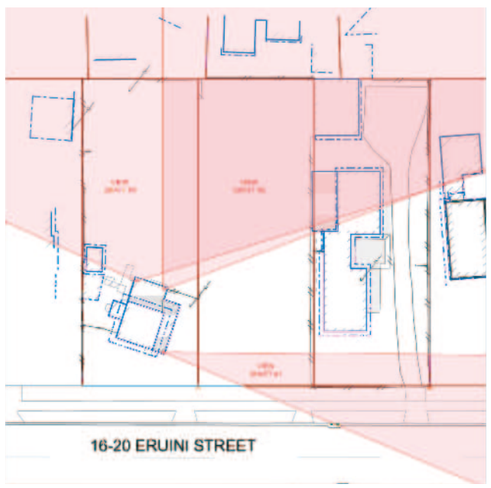
Good design is not only about height and/or building type but also focuses on creating connections between new and old, between people, places and activities. This is why the quality of design also needs to be assessed in relation to its immediate surroundings and the wider context. New development should aim to respond to the unique characteristics that exists in the surrounding environment and contribute to the collective quality of the urban environments of the Kāpiti Coast. The presence of these and other unique characteristics will vary depending on location, and any development will need to consider the range of unique characteristics that contribute to the local context within which the development is situated.

- The site is within a residential neighbourhood, with mostly stand-alone neighbouring dwellings, on single sites. The site is accessed from Eruini Street, with both stand-alone homes and duplexes fronting the street. The duplexes are modest in scale, presenting a similar bulk to a large stand-alone dwelling. As the site combines three properties, the three adjacent building forms create a natural level of visual intensification along the most prominent boundary, ensuring a cohesive integration with the surrounding environment.
- The site is relatively flat but within a flood hazard area, requiring earthworks to raise dwellings and outdoor living spaces, with a maximum fill depth of 1.68m. To minimize the island effect created by the earthworks, the carpark and vehicle access have been kept as low as possible, with only necessary elevation for services and drainage, to better integrate with the surrounding topography.
- Retaining walls are used along key boundaries to accommodate level changes, with fencing and planting incorporated to mitigate visual and privacy effects. Along the southeastern boundary, fence heights are lowered to reduce bulk, and as this area is for vehicle access only, privacy impacts are minimal. Adjacent to Unit 7, the outdoor space is lowered, with hedging providing additional screening. On the southwestern boundary, retaining is integrated into the building design to soften the transition, with raised planters enhancing privacy. Street-facing retaining is screened with planting and utilises low semi-permeable fencing to reduce visual impact. These measures ensure that despite necessary level changes, the development maintains privacy, mitigates visual effects, and integrates with its surroundings.
- There are no known sites of significance in the immediate area, however Kāpiti Island is partially visible from the site, so the outdoor living areas have been raised where possible to provide a visual connection with the Island.

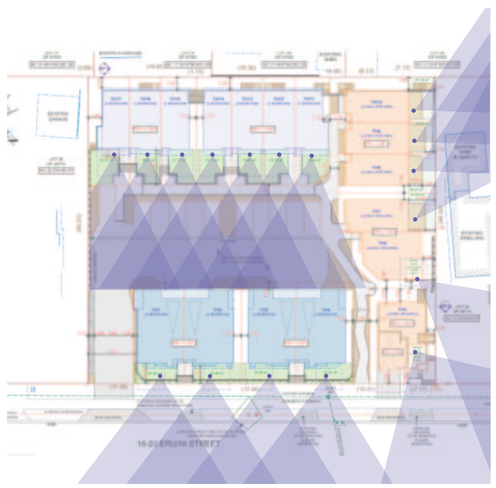
Elevation of proposed bulk along street frontage (Units 1-5), with three built forms adjacent the street, providing a similar level of bulk to three dwellings.

Photo of the existing site frontage

Provided	*Not Provided*	*Not Relevant*	*Design Guidelines*
●			**G55.** Identify the range of unique characteristics that contribute to the local context of the development.
●			**G56.** Any new development should respond to the unique characteristics in its surroundings and contribute to a cohesive streetscape.
●			**G57.** New buildings should ensure that any visual links to unique and/or prominent features in the surrounding environment will be retained where practical.
		●	**G58.** Considerations when developing adjacent to a heritage building.



Existing view shafts from 20 Eruini Street



Indicative view shafts from proposed development outdoor areas

Existing view shaft towards Kāpiti Island from 20 Eruini Street

Landscape treatment and design

Landscape design can greatly improve the amenity, experience and integration of intensive residential development into a street or neighbourhood. The implementation of carefully considered landscape design can help to enhance different design elements, such as the screening or softening of hardstand areas (driveways, parking, services areas), mitigate the effects of building bulk and offer amenity and environmental benefits.
Coordinating landscaping and water management early in the building and site design process can increase opportunities to more effectively integrate landscape treatment into outdoor living space, traffic circulation routes, service locations and the interface between the public and private domain.

- A landscape plan has been provided in Appendix D of the Resource Consent application, which provides details of screening and softening treatments to hardstand areas and amenity and environmental benefits. Landscape treatments have been integrated into outdoor living spaces, traffic circulation routes, service areas and the interface between the public and private domain to provide positive outlook and amenity.
- There is a small amount of existing vegetation along the external boundaries of the site, which will be removed for the construction of the dwellings. It is not considered to be of sufficient quality for retention.
- The vehicle crossings have been carefully placed to avoid the existing street tree to ensure its retention and protection.

Provided	Not Provided	Not Relevant	*Design Guidelines*
	•		**G59.** Where possible, existing mature and healthy vegetation should be retained and integrated into the site development.
•			**G60.** Use planting to improve the outlook from dwellings and the street and to soften hard surface areas such as car parks, service areas or along internal site boundaries and driveways/shared accessways.
•			**G61.** Use hedges or climbing plants where space is constrained and larger vegetation where sufficient space and access to rainwater is available.
•			**G62.** Choose plants that are appropriate to the climatic conditions and character of the area; planting species that require low maintenance and attract local bird life is also encouraged.
•			**G63.** Deciduous trees provide shade in summer and light in winter, but careful consideration should be given to species selection in heavily shaded areas to ensure survivability.
•			**G64.** Use of hard landscape elements such as low walls, kerbs or raised beds is encouraged as these can provide protection to plants and, where integrated into the site design, can add to the visual amenity of outdoor spaces.
•			**G65.** Minimise the use of impermeable surfaces to manage and dispose of on-site stormwater. The use of permeable paving in locations such as parking spaces/areas is encouraged.

Site map showing pedestrian and vehicle circulation and access

G59

Existing street tree to retain and protect

Existing trees to the front of 20 Eruini to be removed

Existing trees and vegetation to the rear of 20 Eruini to be removed

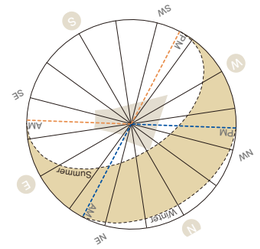
Existing tree to the rear of 20 Eruini to be removed

Sunlight and daylight

Adequate access to natural light is an important consideration in designing the layout of a site, particularly any opportunities to capitalise on a northern aspect.
It is also a key consideration in siting and designing the internal layout of associated dwellings as it not only provides a warm and pleasant internal living environment but helps to increase energy efficiency.

- The dwellings have been oriented to ensure that habitable spaces maximise sunlight access, with units oriented to receive good northwestern or northeastern sunlight.
- Units 5-10 have raised outdoor living areas to maximise sunlight access and views, as the existing neighbouring dwelling to the northwest is creating shading to the northwestern portion of the site that would otherwise have shaded ground-level living of Units 6-8.
- The street facing units are oriented and raised so that they can have a strong relationship with the street, while maximising sunlight access to outdoor living areas.
- The design of each unit includes a high-level of glazing adjacent the main habitable living areas, which allows the units to achieve good sunlight access from multiple directions.
- With the exception of four mid-block units, all units have windows on at least three façades to maximise sunlight access for each unit.
- The mid-block units have large glazed doors on the northeastern or northwestern façades to ensure they still receive positive sunlight access despite only being open on two sides.

Site map showing sunlight access to outdoor areas (upper-level of Units 5-10 shown)



Provided	Not Provided	Not Relevant	Design Guidelines
●			**G66.** Design dwellings with habitable spaces facing north, west or east to maximise sunlight access.
		●	**G67.** Buildings that are relatively deep and narrow, or that have limited north facing frontage, benefit from larger floor-to-ceiling heights; where this occurs consider the use of taller windows to ensure deeper sunlight penetration.
	●		**G68.** On narrow sites place balconies and windows in habitable spaces to the front or the rear of the building to allow for daylight access, outlook and privacy.
		●	**G69.** Consider the use of skylights, atriums or light wells to provide sunlight access to internal spaces with no external walls.
●			**G70.** In order to maintain sunlight access, high level windows or louvres should be considered where privacy is an issue.

Energy efficiency

An energy efficient home promotes sustainable living, limits the impact on the environment by relying on sustainable energy sources and can produce long term cost savings to residents. Integrating efficient passive design into a building contributes to a more comfortable indoor environment by increasing the thermal stability, reducing indoor condensation and promoting natural ventilation; it also helps reduce energy usage. Energy efficiency should be considered during all phases of development, from planning and design (e.g. internal layout and building systems) through to construction (e.g. minimising waste) and long term maintenance (e.g. using durable materials).

- Sustainable energy sources have been integrated into the design, with sunlight access maximised by raising the outdoor living areas, and summer shading provided by utilising overhangs over the large northern, windows.
- Windows are generally minimised to the south to avoid heat loss.
- Eaves provide passive solar shading, blocking high-angle summer sun while still allowing lower-angle winter sun to enter. Eaves are extended over the northern façades to reducing heat gain and regulate indoor temperatures.
- Passive ventilation is created for the dwellings through the placement of opening windows on opposing sides of the living areas.
- Skylights and clerestory windows have been utilised to increase sunlight access to the rear bedrooms of Units 11-17.
- The only rooms not to have external windows are some of the bathrooms, however, these have been provided mechanical ventilation. Good levels of internal sunlight will be achieved to living and bedroom areas, with the roof of Units 11-14 angled to minimise shading on neighbouring properties and allow for additional windows to allow increased sunlight access to the rear bedrooms.
- The central carparking area creates breathing space within the development, allowing a good level of sunlight to access both levels of each dwelling. The outdoor living areas are oriented to maximise sunlight access, and the large glazed doors between the internal and external living areas, along with the open plan layouts, ensure sunlight access to internal living areas throughout the year.
- Trees are included within the outdoor areas where possible to provide shading.

Provided	*Not Provided*	*Not Relevant*	*Design Guidelines*
●			**G71.** Where possible, site long buildings on an east-west axis, with living areas orientated to the north to optimise solar access.
●			**G72.** Consider locating opening windows on opposite sides of a dwelling to enable natural cross ventilation.
●			**G73.** The total window surface on south facing façades should also be limited to prevent heat loss in winter.
●			**G74.** Use of eaves is encouraged as they can help limit the duration of sunlight penetration in summer, preventing indoor spaces (particularly those with a northern aspect) from becoming too warm.
	●		**G75.** When designing large scale developments, consider installing a communal (solar) hot water heating facility as it has the potential to offer greater efficiencies compared to heating sources in individual units.

Site map showing energy efficiency techniques used (upper-level of Units 5-10 shown)

Additional skylight/high-level windows added to increase sunlight access to rear bedrooms of Units 11-17

Privacy and safety

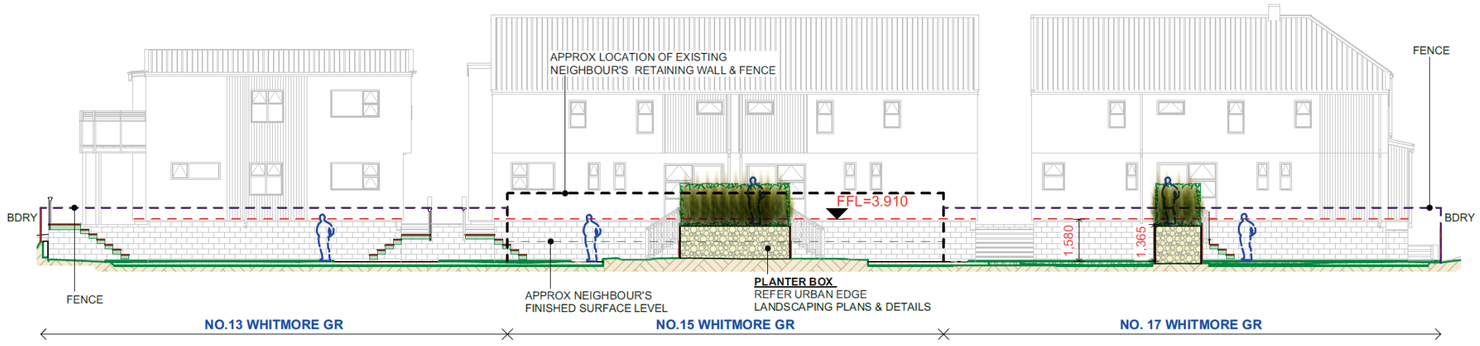
The orientation of dwellings and their interface with public and communal open spaces are important safety and privacy considerations. In designing for safety and privacy, adequate account needs to be taken of the relationship of new and adjoining buildings to ensure a successful balance is achieved between protecting private amenity and providing opportunities for passive surveillance.

- Dwellings have been orientated to face the public and communal open spaces. The relationship between new and adjoining buildings has been considered to ensure a successful balance of privacy and passive surveillance, with raised outdoor living areas which receive good sunlight, encourage passive surveillance, optimise views, while minimising privacy implications.
- Upper-levels generally include bedrooms and bathrooms, with bathroom windows frosted. The exception to this is the upper-level living areas of Units 5-10. These are oriented to face the street or views towards Kāpiti Island. Units 7-10 utilise 1.6m high privacy screens around the northern portion of the decks to direct views away from the adjacent dwelling and towards the views.
- The remainder of the living areas are located at ground level, where fencing and garden beds provide privacy and prevent intervisibility between opposite windows, and of neighbouring dwellings.

Design Guidelines

Provided	Not Provided	Not Relevant	
●			**G76.** Where possible, locate rooms such as kitchen, dining or lounge in multi-unit developments to face the street or an adjoining open space as this will enable passive surveillance of these areas.
●			**G77.** Maintain privacy between dwellings by screening upper level windows or balconies to limit opportunities for residents to directly overlook adjacent properties.
●			**G78.** Consider staggering window locations in buildings that face each other, to limit direct views into adjacent habitable rooms.
		●	**G79.** Consider a larger setback between taller buildings to improve privacy for residents (and also to contribute to daylight access and outlook).
●			**G80.** Clearly delineate boundaries between private, communal and public spaces as this increases user perceptions of safety and helps to identify intruders.
●			**G81.** Use lighting, planting and fencing to enhance the safety of residents and visitors and incorporate these elements into the design process.
●			**G82.** Consider low level planting or trees with higher canopies to minimise the risk of light sources becoming obscured by landscape elements, particularly around sensitive areas.
●			**G83.** Where dwellings are located close to the street, elevate the ground floor of the dwelling slightly above the street level to provide outlook into the street while maintaining privacy for residents.
●			**G84.** Strategically locate communal open space to encourage passive surveillance within the development and of adjoining sites.

- The dwellings have been designed to provide staggering of windows when placed adjacent each other to minimise direct views between habitable areas. While there is potential for intervisibility between bedroom windows, these are less privacy sensitive during the day, when they are less likely to be occupied, and curtains can be relied on for privacy as needed.
- The proposed floor levels of the dwellings are raised in accordance with advice from Greater Wellington Regional Council. This allows glazing to be maximised at the frontage, aiding in allowing visibility to the street and shared spaces from the ground level living areas, while limiting visibility back up and into the dwellings for effective privacy. Semi-permeable fencing and hedging has also been applied to the frontages of the street facing and carpark facing units that will allow views out, while limiting views back in for additional privacy benefits.
- Boundaries between private, communal and public spaces are clearly delineated with planting and/or semi-permeable fencing to provide clear delineation between spaces and increase user perceptions of safety.
- Lighting has been incorporated throughout the development for safety and wayfinding at night, including sensor lights to the main entrance of each dwelling and bollard and fence-mounted lights within shared areas.
- Low-level planting and clear-stemmed trees with higher canopies are utilised to minimise the risk of light sources becoming obscured, and increases visibility within the shared spaces to increase safety.
- Vegetation is utilised adjacent the street front and adjacent semi-permeable fencing to increase privacy by obscuring views and setting users back from the interface.
- The buildings are no more than two-storeys high, which is not notably tall, however, buffer space between the proposed dwellings is created with service areas and planting.
- The rear southwestern boundary adjacent 13, 15 and 17 Whitmore Grove, interfaces with the rear service areas of Units 10-17. These units are raised to meet minimum floor-levels, but service areas are placed at ground-level, with stair access down, to minimise privacy implications. Raised integrated planters are placed along the boundary adjacent the access door and landing, to minimise any potential transient overlooking to these properties given the level difference, without creating a large dominant fence line along the boundary treatment.
- The outdoor area of Unit 17 is dropped in height so that it sits level with the carpark, with a hedge utilised along the boundary to minimise overlooking of the adjacent neighbouring property at 22 Eruini Street.



Render of the street frontage of Units 1-4

CONCLUSION

The proposal is sympathetic to the local environment and is consistent with the outcomes sought under the design guide. Care has been taken to ensure that the design will follow the KCDC Residential Design Guidelines appropriately. The proposal will result in a high-quality design that contributes to the existing and future character of Waikanae, and will provide an attracting and comfortable living environment for users, residents, and visitors. Overall, it is considered that given the design measures that have been incorporated into the layout of the development, any potential residential character or visual amenity effects arising from the proposal will be minimal, and the development will provide a positive contribution to the neighbourhood.

URBANEDGE
PLANNING LTD

Resource Consent Application and Assessment of Environmental Effects

16-20 Eruini Street, Waikanae Beach

DATE – 4 April 2025

APPLICANT – P & C Eruini Ltd

PO Box 39071
Wellington Mail Centre
Lower Hutt 5045

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Appendix G. Transport Assessment
Appendix H. Infrastructure Assessments
Appendix I. Geotechnical Assessment
Appendix J. Consultation with Iwi

To: Resource Consents Manager

Address: **Kāpiti Coast District Council**
Private Bag 60601
Paraparaumu 5254

Urban Edge Planning on behalf of P & C Eruini Ltd applies for the following land use and subdivision consents under sections 9 and 11 of the Resource Management Act 1991 (RMA):

Location of application site	Street Address:	16-20 Eruini Street, Waikanae Beach
	Legal description:	Lots 31, 32, and 33 DP 26719
	District Plan zoning:	General Residential Zone
	Overlays:	Flood Hazard – Ponding Coastal Environment
UEP Job No.	24253	
Type of resource consent	Land use and subdivision consent	
Brief description of the proposal	Construction of 17 new dwellings with enabling earthworks Subdivision to create 18 allotments (17 with units, and one access lot)	
Activity Status	Land Use – Discretionary Activity Subdivision - Discretionary Activity	
Other consents required	None	
Deposit fee	$5,370 (combined land use and subdivision)	
Address for service	**Urban Edge Planning Ltd** Karen Williams karen@uep.co.nz 027 303 8835	
Address for invoices	Contact Person: Mark Cook Email: mark@palmerandcook.co.nz P & C Eruini Ltd 39 Rutherford Street, Hutt Central, Lower Hutt	

Urban Edge Planning attaches, in accordance with **Schedule 4 of the RMA 1991**, an assessment of environmental effects containing the level of detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment.

Urban Edge Planning also attaches, in the policy analysis, the relevant information required to be included in this application by the Operative District Plan. No additional information requirements apply in this case under the RMA or any regulations made under the RMA. No regional consents are required as part of this proposal.

Signature of applicant:

Karen Williams

Urban Edge Planning
On behalf of P & C Eruini Ltd
Date: 4 April 2025

1. Existing Environment

1.1 Location and General Description

The subject site at 16-20 Eruini Street is located on the western side of Eruini Street, Waikanae Beach. The site comprises three adjoining parcels of land, with an overall site area of 2,427m².

The site is situated in a predominantly flat coastal area, sloping gently down towards the southwest. The wider site has been utilised for residential purposes and the overall site accommodates an existing stand-alone dwelling, a set of flats, a garage structure, a shed, and fencing. The dwelling at 18 Eruini Street was previously removed, with this site currently vacant.

There are no listed key indigenous trees, notable trees listed under Schedule 8 of the District Plan, or naturally occurring trees that meet the height and size requirements within 'ECO-Table 1 - Key Indigenous Tree Species' within the site, with the existing vegetation within the site being residential in nature with limited vegetation cover.

The application has a wide frontage onto Eruini Street, with several formed vehicle access crossings to the Eruini Street frontage.

Figure 1: Aerial of subject site (source: GRIP)

The site is adjoined by four residential lots to the southwest, one residential lot to the northwest, and one residential lot to the southeast.

Wider site context information is outlined below:

- The site is well located within 400m of the beach, around 1km to nearby eateries and within 2km of the Kapiti expressway.

- The development site is well located to public transport services with the nearest public bus route (route 280) taking in both Queens Road and Tutere Street. This route operates to a frequency of 20 minutes through to 60 minutes with the frequency increasing during the morning and evening peak periods. Bus stops are located within 200m - 300m in either direction of the development site. The bus service connects with the Waikanae train station, which is ca. 5km away.

- The site is well connected to local recreation areas, with Waikanae Beach, a playground and 2 reserves all within easy walking distance to the site.

- The subject site is 5km from the Waikanae town centre, which has a supermarket, cafés, cinema and medical centre.

- Kārewarewa Urupā Block is located further to the southwest, which is currently separately going through a planning process under Plan Change 3 to the Kāpiti Coast District Council District Plan.

1.2 Planning Environment

The site is located within the General Residential Zone (GRZ) of the Operative Kāpiti Coast District Plan. The wider site (and surrounding area) is identified to be subject to ponding. The modelled flood level is at RL 3.46 m[1] which is tidally driven and consistent with the flood level in the wider area. The site is also located within the Coastal Environment overlay.

The site is not subject to any designation, heritage protections or significant natural, cultural or archaeological resources under the District Plan. As noted above, the site is in proximity but well outside of the Kārewarewa Urupā Block. Eruini Street is identified as a Local Community Collector Road, and under the One Network Road Classification (ONRC) is classified as an access road.

The site is not identified as contaminated under the GWRC Selected Land Use Register (SLUR).

[1] All flood level data supplied by GWRC and AWA was provided using Wellington 1953 datum. It is understood that KCDC has since transitioned to the vertical datum national height standard NZVD2016. Survey and engineering plans showing converted levels will be provided at the subsequent engineering and as-built stage of works, to ensure consistency with the shift to NZVD2016.

Figure 2: District Plan zoning and overlays. Source: Council E-Plan

Figure 3: District Plan zoning and overlays without flood hazard overlay. Source: Council E-Plan

1.3 Legal Description

The three adjoining sites comprising the application site are legally described as Lots 31, 32 and 33 Deposited Plan 26719.

There are no restrictions or interests registered on the Record of Titles which would affect the proposal.

A copy of the Record of Titles are attached at **Appendix A**.

2. Proposal

2.1 Description of the Proposal

The applicant is seeking resource consent to construct a total of 17 residential units across the site and undertake an 18-lot fee simple subdivision. The proposal also includes earthworks to facilitate the construction of the development. To service the new buildings, retaining as well as assorted infrastructure is proposed, including a centralised shared parking and circulation space.

Architectural plans for the units are attached at **Appendix B** and the scheme plans of the subdivision are attached at **Appendix C**. Engineering Plans are included within Appendix 1 of the Infrastructure Report at **Appendix H**.

2.1.1 Land Use

The development will result in the existing dwellings being demolished and replaced with the 17 townhouse units as outlined in this resource consent documentation. The proposed built form associated with this application is shown in detail in the drawings prepared by Design Network Architecture. The underlying building coverage across the wider application site will be 42.86% (noting the surveyed land area is 2,427m²).

The units are all two-storey, and are broken up into seven blocks, with 1-4 units in each block. One unit is stand-alone, six are in duplex configurations, six are in triplex configurations and four are terraced in a block of four. Each unit is designed with the following parameters:

- **Units 1-4** are a four-bedroom, two-storey, duplex typology, with private outdoor areas located adjacent the street to capitalise on sunlight access. These units are raised from ground-level to improve privacy while still promoting passive surveillance to the street. A hedge is utilised along the frontage to screen the retaining wall and improve streetscape greening along the frontage. Garages for these units are located to the rear to improve pedestrian safety and streetscape effects.
- **Unit 5** is a two bedroom, two-storey, stand-alone typology with outdoor area and living on the upper level and secondary ground-level outdoor living space to the rear from the bedrooms. A single garage with direct frontage to Eruini Street provides the onsite carparking for this unit.
- **Units 6-7** are a two bedroom, two-storey, duplex typology. These units are located off the vertical pedestrian access through the site, and have upper-level outdoor living to the northwest to capitalise on views over Kapiti Island. Patios are located beneath these decks at ground-level surrounded by planting, to provide a secondary outdoor living area and separated service area. Unit 7 has an allocated carpark within the centralised parking area, whereas Unit 6 has no designated on site carpark.
- **Units 8-10** are a two bedroom, two-storey, triplex typology. These units are also located off the vertical pedestrian access through the site, and have upper-level outdoor living to the northwest to capitalise on views over Kapiti Island. Patios are located beneath these decks at ground-level surrounded by planting, to provide a secondary outdoor living area and separated service area. Parking for these units will be accommodated in the shared parking area located centrally within the site.
- **Units 11-14** are a two-bedroom, two-storey, terrace typology (block of 4) with living at ground-level and outdoor areas and access to the frontage, with services to the rear. The outdoor areas are northeast facing to capitalise on sunlight access, and are raised slightly from the carparking area to improve privacy.. The service areas are located to the rear, and dropped in level to minimise privacy effects on the adjacent neighbours. A raised planter box is positioned adjacent the landing to provide immediate

privacy without creating a dominant boundary treatment. Parking for these units will be accommodated in the shared parking area located centrally within the site.

- **Units 15-17** are a two-bedroom, two-storey, triplex typology with living at ground-level and outdoor areas and access to the frontage, with services to the rear. The design of the outdoor areas and service areas are to Units 11-14 described above. Parking for these units will be accommodated in the shared parking area located centrally within the site.

Two vehicle crossings are proposed, one to service proposed Unit 5 and the other being a shared accessway to service the wider site. The three existing crossings will be removed and kerb and channel reinstated. The shared accessway will be formalised as a shared access lot under the fee simple subdivision. Private bike storage is provided within some units to encourage the use of alternate transport.

Site earthworks are required to create buildable areas that meet Recommended Building Levels to mitigate potential flooding, establish vehicular access to the dwellings, and erect retaining walls to facilitate the dwelling construction. The earthworks at the site consist of total cut volume of 11m³ to finished subgrade levels, total fill volume of 2,284m³ to finished subgrade levels, an earthworks area of 2,427m², cut height of 0.60m and fill depth of 1.68m[2].

While earthworks have been designed to minimise the material that needs to be imported to the site there is a net import of fill required to raise site levels to meet required flood levels. Standard sediment control measures in accordance with Greater Wellington Regional Council's compliance document – Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region will be employed during the construction phase as shown on drawing 2300 of the engineering plans within the Infrastructure Report at **Appendix H**.

Given the multi-unit nature of the development, it is proposed to undertake specific landscape works as part of the development to provide visual mitigation for the earthworks and the townhouses. The proposed planting will also provide high quality amenity for the residents. The site will be planted out with native trees and shrubs to provide an easy care visually appealing area for the residences to look out onto. The outdoor areas will have paving and timber fencing to provide privacy and ensure year-round use. A Landscaping Plan set is also provided at **Appendix D** to this report.

2.1.2 Subdivision

It is proposed to undertake an 18-lot fee simple subdivision in association with the above land use development.

The proposed subdivision will result in the creation of 17 residential allotments ranging in size from 70m²-141m², as shown on the scheme plan**.**

Lot 18 is an access lot with an area of 738m², containing the shared driveway and circulation space, bin storage space. This will be held in common ownership amongst the owners of Lots 1-4 and 6-17. This will be secured via an amalgamation condition. Unit 5 has independent access and bin collection, so will not be reliant on this shared accessway.

The scheme plan, easement schedule, and proposed amalgamation conditions can be found in **Appendix C**.

2.1.2.1 Access and Car Parking

Primary access to the site will be via a private accessway within Lot 18. This shared accessway will include adequate aisle widths to enable onsite turning. The internal carriageway will be sealed and provision is made for a pedestrian footpath. The access is designed to accommodate medium rigid vehicles (such as waste

[2] These cut/fill heights and quantities do not include the gravel rafts, instead this provides the comparison between the current EGL and the proposed FGL For levels inclusive of excavation/backfill associated with gravel rafts, please refer to sheet 13 of the application plans at Appendix B.

collection vehicles, although these will reverse manoeuvre into the site). This accessway will service all units, except Unit 5, which will be serviced independently by an additional vehicle crossing. Further details on the internal roading and access can be found in the Transport Assessment at **Appendix G**.

With the exception of Unit 6, each unit will be provided with carparking in accordance with the Design Network Architecture plans and NZS2890.1 Off-street Car Parking.

2.1.2.2 Works and Services

Each allotment will be provided with water, stormwater, wastewater, power and telecommunications in accordance with NZS4404 and KCDC Land Development Minimum Requirements (LDMR) and as follows:

Potable Water Supply

It is understood that there is no issue with potable water supply capacity and fire flow pressure at the site. The water supply design accounts for both potable and fire-fighting needs.

The proposal entails constructing a new 63OD PE100 diameter rider main to provide a water supply to most of the new lots. Existing water connections will be utilised by Unit 5 if it is in satisfactory condition, or alternatively they can be decommissioned and replaced. This new rider main will connect to the existing 150 mm diameter public water main, as indicated in the provided plans in the Infrastructure report.

Two existing fire hydrants are located near the site on Eruini Street. One is situated directly across the street from the development, while the other is positioned approximately 55 meters away.

Rainwater Re-use

Water meters and meter boxes are expected to be required. The District Plan permitted standards require new residential buildings to be connected to a 10,000 L water re-use tank, or a 4,500 L water re-use tank if installed in conjunction with a greywater system. For the permitted standard, the water re-use tanks are to be connected to outdoor hoses and toilets.

The District Plan also has a restricted discretionary standard which demonstrates that water demand is reduced by 30% from “household 2007 summer average water use” (1,560 L/Household/Day or 520 L/Person/Day). For the balance of the water reduction, 3,000L of rainwater storage for potable water re-use (outdoor use only) is proposed. These tanks will be located within the foundations of the units in an aquacomb or similar system to supply the development for outdoor water use. This aspect of the proposal will meet water demand management, as per INF-MENU-R35.

Stormwater Servicing

As outlined in the Envelope Engineering Infrastructure report at Appendix H, individual private lots will discharge roof and landscape areas to a shared common private system discharging to a shared common private soak pit under the trafficable access road. The trafficable area is sloped at between 1-5% grade to longitudinal dished channels discharging to a trapped sump then into the same common soak pit structure. The soak pit structure is designed to contain and discharge rainfall events up to the 100 year return 1% AEP rainfall events. Rainfall events in exceedance of this design will bubble up from the trapped sump and discharge east to the Eruini Street kerb and channel system.

Soakage has been determined as feasible on this site through testing and subsequent reporting undertaken by Soakage Test Services Limited (see Appendix H). There are no proposed connections to the public stormwater system.

Ongoing maintenance requirements and obligations of the shared systems will be detailed in consent notices and/or residents association documentation.

The stormwater system design incorporates Water Sensitive Urban Design (WSUD) measures and achieves hydraulic neutrality, ensuring that the peak flow rate of stormwater discharged from the site post-development does not surpass pre-development levels, for a 1 in 100 year rainfall event. Mitigation measures have been designed and implemented in accordance with Kapiti Coast District Council's Land Development Minimum Requirements within the civil design and model. These consist of underground attenuation tanks (e.g. Cirtex Rain Smart) with a total of 225 and 342 crates to attenuate peak flow for the 10 and 100-year events of the fully developed site, respectfully. As outlined in the Infrastructure Report at Appendix H, the locations of the tanks have been identified and are shown on the plans but the exact configuration of the devices including detailed layouts (orifice and inlet details etc.) will be confirmed at the detailed design stage.

Wastewater Servicing

Wastewater modelling and reporting has been undertaken by Hydraulics Analysis Limited, on behalf of Kāpiti Coast District Council. This modelling confirms that wastewater mitigation is not required.

Wastewater from each unit will be conveyed to a shared private wastewater pipe, as shown in the drawings provided in the Infrastructure Report at Appendix H. The connections are shown indicatively, and the actual connection points will be confirmed at the detailed design stage. Wastewater will be discharged from site via gravity connecting to the existing public main within Eruini Street. Ongoing maintenance requirements and obligations of the shared systems will be detailed in consent notices and/or residents association documentation.

Power and telecommunications

Each allotment will be provided with a connection to reticulated gas, power and telecommunications networks in accordance with provider requirements.

Waste Collection

Private bin collection is proposed, consistent with waste and recycling collection throughout the district. Collection will be kerbside within the site (except for Units 1-8, which will be collected from the kerb within Eruini Street). Ability to service the site has been provided in written confirmation by Low Cost Bins. A waste management plan will be prepared for submission to Council (post lodgement) in line with the Council's Solid Waste Management and Minimisation bylaw.

Easements

It is proposed to create easements where necessary to protect and provide access, services, carpark allocations, area for communal bin collection, and party walls.

2.1.2.3 Residents Association

A Residents Association will be established to manage communal property and facilities onsite (such as maintenance of communal areas, lighting, the access driveway, and shared services).

2.1.3 Summary of proposal

It is proposed to develop 16-20 Eruini Street, Waikanae Beach into a comprehensive residential development comprising 17 2-4 bedroom units in two-storey buildings as shown in the architectural drawings at **Appendix B**. The proposed development will be subdivided as a fee simple title development as shown in the Scheme Plan at **Appendix C**. Earthworks will be undertaken to building up a flood free platform and establish access, retaining

walls, and building foundations. The development will include on site vehicle access and carparking. The proposed development will be served by urban infrastructure connected to the existing networks.

3. Resource Consent Requirements

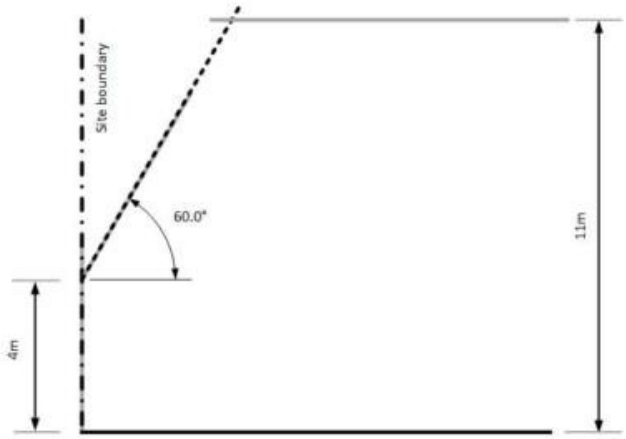
3.1 Standards and Rules Assessment

The following table assess the degree of compliance the proposal has with the relevant Operative District Plan rules and related standards.

Table 1: Operative District Plan Standards and Rules Assessment

District Plan Rule No.	Rule / Standard	Compliance
GENERAL RESIDENTIAL ZONE		
GRZ-R1	Any activity that is a permitted activity under the rules in this chapter. 1. The activity must not cause offensive or objectionable odour, dust or smoke at or beyond the boundary of the site on which it is occurring. 2. Each allotment must have a permeable surface area that is not covered by buildings, paving or other impermeable objects of not less than 30% of the total allotment area. 3. Any lighting must be directed so that the spill of light is contained within the boundaries of the site on which the activity occurs. Light level from the activity must not exceed 10 lux, when measured 1.5 metres inside the boundary of any other site located in the Residential Zones or Rural Zones. This standard does not apply to street lighting on legal roads.	**Does not comply** The proposed residential activity will broadly comply with these standards. The total allotment will comprise a minimum of 30% permeable surfaces, and outlined in the Landscape Plans, however each allotment following subdivision will not meet this standard. Resource consent is required under **Rule GRZ-R12** as a Restricted Discretionary Activity.
GRZ-R2	Any residential activity which is not specified as a permitted, controlled, restricted discretionary, discretionary, non-complying or prohibited activity in the rules in this chapter. 1. The activity complies with all permitted activity standards in this chapter.	**Does not comply** The activity does not comply with all permitted activity standards.
GRZ-R3 Fences and Walls	*Height (measured above original ground level).* Standards: 1. The maximum height of any fence or wall on a boundary shall be 2 metres, except: a) in the front yard, where the maximum height shall be 1.8 metres; b) NA; c) NA 2. For the purposes of calculating maximum height under standard (1) above where a fence is erected atop a retaining wall, the height shall be the combined distance measured vertically from the base of the retaining wall to the top of the fence.	**Does not comply** The combined height of retaining and fence above will exceed 1.8m on the front boundary in the locations shown on sheet L010 within the Landscape Plan set at Appendix D.
GRZ-R4 – GRZ-11	Not applicable	**NA**
GRZ-R33 MDRS Building and Density Standards	New buildings and structures, and minor works, additions or alterations to any building or structure. [see assessment further in table below]	**Does not comply** *Standards as set out and assessed below*

District Plan Rule No.	Rule / Standard	Compliance
		Resource consent is required under **Rule GRZ-R36** as a Restricted Discretionary Activity due to non-compliance with standards 5 [building coverage – following subdivision], and 6 [outdoor living space], and 8 [outlook space] in GRZ-R33. Resource consent is also required under **Rule GRZ-R37** as a Restricted Discretionary Activity due to non-compliance with standard 1 [residential units exceeding three] in GRZ-R33.
GRZ-R33 Standard 1	<u>Number of residential units or retirement units per site:</u> 1.There must be no more than 3 residential units or retirement units per site. This standard does not apply to minor works, additions, or alterations to buildings and structures that do not increase the number of residential units or retirement units.	**Does not comply** Prior to subdivision, there will be 17 units. Following subdivision, there will be one unit per allotment.
GRZ-R33 Standard 2	<u>Height:</u> Buildings and structures must not exceed: 11 metres in height, except that 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1 metre, where the entire roof slopes 15° or more, as shown on diagram within the rule. Height must be measured using the height measurement criteria.	**Complies** All proposed units are below the permitted 11m height limit.
GRZ-R33 Standard 3	<u>Height in relation to boundary:</u> Buildings and structures must not project beyond a 60° recession plane measured from a point 4 metres vertically above ground level along all boundaries, as shown on the following diagram. Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way.	**Complies** The HIRB control does not apply along the eastern (road) boundary of the site. The 4m + 60° control applies along the northern, western and southern boundaries and is complied with by the development. Refer to the architectural plans at Appendix B, specifically sheets 5 and 32-34.

District Plan Rule No.	Rule / Standard	Compliance
	 This standard does not apply to: • a boundary with a road; • existing or proposed internal boundaries within a site; • site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed.	As the recession plane control does not apply along common walls or internal boundaries, compliance with this standard is not varied by the proposed subdivision.
GRZ-R33 **Standard 4**	<u>Setbacks</u> Buildings and structures must be set back from the relevant boundary by the minimum depth listed in the yards table, being Front – 1.5m Side – 1m Rear – 1m NB: This standard does not apply to site boundaries where there is an existing common wall between 2 buildings on adjacent sites or where a common wall is proposed.	**Does not comply** The proposal complies with this standard both with regard to external site boundaries, and internal yards as it relates to the buildings. The external stair structures providing access to outdoor service areas for Units 11, 12, 13, 16 and 17 will marginally encroach into the 1m setback. For completeness, it is noted that Unit 1 is positioned less than 1m from the internal boundary with Lot 18. However, the definition of 'site' includes all areas of land held in a single title, or adjoining legally defined allotments that cannot be dealt with separately without the approval of Council. As Lot 1 will be amalgamated with Lot 18, it falls within the 'site' boundary and therefore the setback from Lot 18 would not appear to require consent. Should Council disagree with this

District Plan Rule No.	Rule / Standard	Compliance
		interpretation, consent is sought accordingly.
GRZ-R33 **Standard 5**	Building Coverage The maximum building coverage must not exceed 50% of the net site area.	**Does not comply [following subdivision]** The overall site is 2,427m², and the combined total of building and deck areas will be 1,040.38m², therefore the underlying building coverage across the wider site will be 42.86%. When the access lot (created through the subdivision) is removed from the net site area, the building coverage across the application site will revert to 61.60%. Following subdivision, individual site coverage will exceed 50% within Lots 1-13, and 16 as the lot boundaries for these sites will largely follow the outline of the proposed units, and outdoor living spaces. These areas have been calculated excluding the land held within Lot 18, which is tied to each residential allotment via amalgamation. There will be no building coverage within proposed Lot 18. Building coverage is displayed on Sheet 1 of plans in Appendix B. The building coverage technical non-compliance arises from the fee simple subdivision that will be determined concurrently.
GRZ-R33 **Standard 6 & 7**	Outdoor living space (per unit) 6. A residential unit or retirement unit at ground floor level must have an outdoor living space that is at least 20m2 and that comprises ground floor, balcony, patio, or roof terrace space that: a) where located at ground level, has no dimension less than 3 metres; and	**Does not comply** Over half of the units have fully compliant outdoor living areas, although the individual outdoor living spaces for Units 5, 6, 9, 11-13, and 16 are below the required 20m²

District Plan Rule No.	Rule / Standard	Compliance
	b) where provided in the form of a balcony, patio, or roof terrace, is at least 8m² and has a minimum dimension of 1.8 metres; and c) is accessible from the residential unit or retirement unit; and d) may be: i. grouped cumulatively by area in 1 communally accessible location; or ii. located directly adjacent to the unit; and e) is free of buildings, parking spaces, and servicing and manoeuvring areas. 7. A residential unit or retirement unit located above ground floor level must have an outdoor living space in the form of a balcony, patio, or roof terrace that: a) is at least 8m2 and has a minimum dimension of 1.8 metres; and b) is accessible from the residential unit or retirement units; and c) may be: i. grouped cumulatively by area in 1 communally accessible location, in which case it may be located at ground level; or ii. located directly adjacent to the unit.	(typically ranging between 17.24m² and 19.09m²).
GRZ-R33 **Standard 8**	Outlook Space An outlook space must be provided for each residential unit or retirement unit as specified in this standard: a. An outlook space must be provided from habitable room windows as shown in the diagram within the district plan rule: b. The minimum dimensions for a required outlook space are as follows: i. principal living room must have an outlook space with a minimum dimension of 4 metres in depth and 4 metres in width; and ii. all other *habitable rooms* must have an outlook space with a minimum dimension of 1 metre in depth and 1 metre in width. c. The width of the outlook space is measured from the centre point of the largest window on the *building* face to which it applies. d. Outlook spaces may be over *driveways* and footpaths within the *site* or over a public street or other public *open space*. e. Outlook spaces may overlap where they are on the same wall plane in the case of a multi-storey *building*. f. Outlook spaces may be under or over a balcony. g. Outlook spaces required from different rooms within the same *building* may overlap. h. Outlook spaces must: i.be clear and unobstructed by *buildings*; and ii.not extend over an outlook space or *outdoor living space* required by another dwelling.	**Does not comply** The majority of units will comply with the 4m x 4m outlook space from primary living areas. The exception to this will be Units 5, 6, 12, 13, and 16, as these units cannot achieve a 4m outlook width off their primary living space when centred on the window. All units will comply with the 1m x 1m outlook space from other habitable spaces.
GRZ-R33	Windows to Street	**Complies**

District Plan Rule No.	Rule / Standard	Compliance
Standard 9	Any residential unit or retirement unit facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.	The street facing facades of Units 1-5 will have a minimum of 20% glazed area.
GRZ-R33 **Standard 10 and 11**	Landscaped area A residential unit or retirement unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site with grass or plants, and can include the canopy of trees regardless of the ground treatment below them. The landscaped area may be located on any part of the development site, and does not need to be associated with each residential unit or retirement unit.	**Complies** The proposed site landscaping will achieve 20% of landscaped areas across the site. The landscaping will include native plants eco-sourced locally.
TRANSPORT		
TR-R2 Vehicle movements	Vehicle Movements Any activity must not generate more than 100 vehicle movements per day.	**Does not comply** The proposed development is anticipated to generate ~116 vehicle trips per day. Resource consent is required under **Rule TR-R10** as a Restricted Discretionary Activity, as a "major traffic activity".[3]
TR-R3 Site access and loading for vehicles	Site Access and Loading 1. Access - every site must provide either: a. vehicular access over land or by mutual right of way or service lane for parking and/or loading and shall be in accordance with TR-Diagram - 2; or b. for sites with no carparking or loading spaces […NA]. 2. Vehicle access and pedestrian access - all vehicle accesses and pedestrian accesses must be designed, constructed and maintained to ensure that: a. they are able to be used in all weather conditions; b. they have no adverse impact on the roadside drainage system; and c. surface water and detritus (including gravel and silt) does not migrate onto the highway pavement. 3. Vehicle access - all vehicle accesses must meet the following: a. be a minimum of 3.5 metres wide, except for as set out in TR-Table 1. b. be a maximum of 9 metres wide, except in the Beach Residential Zone at Waikanae Beach where the maximum shall be 6.0 metres wide.	**Does not comply** *Standard 1* Vehicle access will be in accordance with TR-Diagram-2 *Standard 2* Vehicle access and pedestrian access will be sealed and meet these conditions. *Standard 3* Width of the site access will be at least 3.5m and less than 9m and therefore will meet these conditions. *Standard 4* NA – the proposal is a residential activity. *Standards 5 & 6*

[3] A Transport Assessment has been provided. While a Travel Plan has not been provided, the definitions and advisory notes indicate these are only relevant in relation to places of work and therefore it is assessed that it is not required in relation to residential development. If this interpretation is incorrect, it is acknowledged that resource consnet will be requried under TR-R11 for failing to meet the standards of TR-R10.

District Plan Rule No.	Rule / Standard	Compliance
	4. Vehicle access - sites containing non-residential activities and which provide more than 6 carparks, shall provide two-way vehicle accesses which must be a minimum of 6 metres wide. 5. Vehicle access to/from a state highway […NA]. 6. Vehicle access spacing - at intersections (except on strategic arterial routes) carrying traffic volumes of 1,000 vehicles or more in any peak hour, or at which traffic signals are operating, no part of a crossing point must be located within 30 metres of an intersection or within 60 metres on the departure side of an urban state highway intersection. **Note**: The distance is measured from the intersecting point of the kerb lines or *road* edge lines. 7. Vehicle access spacing - Where a site is located near an intersection having volumes less than 1,000 vehicles in any peak hour; the minimum distance between the crossing point and the roadway edge or kerb line must be: a. 9 metres measured from the intersecting point of the kerb lines or road edge lines or 4.5 metres from the tangent point of the kerb lines or road edge whichever is greater; and b. 12 metres where a "Stop" or "Give Way" control exists on the roadway measured from the intersecting point of the kerb lines or road edge lines. 8. Vehicle access spacing for major traffic activities - no crossing point must be located closer to any intersection than the distance specified in TR-Table 2 - Access Distance Dimensions. Distances are measured in metres (m) to the intersecting kerb line. 9. Vehicle access spacing sight distances - the required minimum sight distance between the vehicle access and the road must be in accordance with TR-Diagram - 3 and TR-Table 3 - Sight Distance Dimensions 10. NA 11. NA 12. Manoeuvring – a. Private residential access - unless the driveway accesses directly from a Neighbourhood Access Route, sufficient manoeuvring space must be provided on-site to ensure no reversing onto the road is necessary. b. NA 13. NA 14. NA 15. Landscaping - all landscaping adjoining the road boundary of subject sites, must be designed and maintained so that visibility to and from the crossing point complies at all times with the minimum standards sight distances set out in TR-Table 3 Sight Distance Dimensions.	Standards 5 and 6 are not relevant (but could be complied with). *Standard 7* The site access will meet this standard. *Standard 8* The site access will meet this standard. *Standard 9* The site access will meet the specified sight distances in TR-Table 3. *Standards 10 and 11* Not applicable *Standard 12* This standard is generally met. However, vehicles will reverse from the garage of Unit 5 directly onto Eruini Street, which is not a Neighbourhood Access Road. *Standards 13 and 14* Not applicable *Standard 15* Landscaping will be designed and maintained to ensure visibility at the site access/crossing point complies with TR-Table 3 Sight Distances. Resource consent is required under **Rule TR-R11** as a Discretionary Activity due to non-compliance with a standard within this Rule.

<table>
<tr><th>District Plan Rule No.</th><th>Rule / Standard</th><th>Compliance</th></tr>
<tr><td>TR-R4
Design and layout of vehicle parking</td><td>1. All parking must be formed, marked out and maintained for use in all weathers.
2. Surface water originating from the parking area must be managed without adversely impacting other properties either upstream of downstream of the development subject site.
3. Vehicles using the parking area must only use the formed vehicle access point (crossing point) to enter and exit the vehicle parking areas.</td><td>Will comply
Proposed parking will be formed, marked out and maintained for use in all weathers.

Surface water from the parking area will be disposed of via the onsite stormwater connection and will not adversely affect either upstream or downstream of the subject site.

The parking area will be formed for vehicle access that will be used to enter and exit the parking areas.</td></tr>
<tr><td>TR-R5 to TR-R8</td><td>[Permitted activity standards not applicable to this proposal]</td><td>NA</td></tr>
<tr><td>TR-PARK-R18
PC1A

Accessible car parks</td><td>Accessible carparks – Table TR-Table 6A introduced by PC1A

Multi-Unit Residential: 6-25 Units – 2 spaces</td><td>Will Comply

The proposal includes allocated carparks, with provision for 2 accessible carparks.</td></tr>
<tr><td>TR-PARK-R19
Cycle parks</td><td>3. Cycle parking must be provided at the rate of:
<u>TR-Table 6B</u>

<table><tr><th><u>Activity</u></th><th><u>Minimum number of visitor cycle parks</u></th><th><u>Minimum number of staff/residents/students cycle parks</u></th></tr><tr><td><u>Medium density housing</u></td><td><u>4 to 20 household units:
1 space

Plus 1 additional space for every additional 20 household units, or part thereof</u></td><td><u>4- 10 household units:
1 space

Plus 1 additional space for every additional 20 household units, or part thereof</u></td></tr></table></td><td>Does not comply

The proposal includes space for bicycle parking for the units, but no specific provision for visitor cycle parks.

Resource consent is required under Rule TR-PARK-R32 as a Discretionary Activity due to non-compliance with this Rule.</td></tr>
<tr><td colspan="3">EARTHWORKS</td></tr>
<tr><td>EW-R2

Earthworks, excluding those listed in EW-R3, in all areas except areas subject to flood hazards, outstanding natural features and landscapes, ecological sites, geological</td><td>Permitted standards

1. Earthworks must not be undertaken:
1. on slopes of more than 28 degrees; and
2. within 20 meters of a waterbody, including wetlands and coastal water.

2. In all other areas except as provided for in Standard 3, earthworks must not:</td><td>Does not comply

The earthworks at the site consist of total cut volume of 11m³ to finished subgrade levels, total fill volume of 2,284m³ to finished subgrade levels, maximum cut height of 0.60m and maximum fill depth of 1.68m.</td></tr>
</table>

District Plan Rule No.	Rule / Standard	Compliance
features, areas of outstanding natural character, areas of high natural character.	a) disturb more than 50m³ (volume) of land per site in *living zones, working zones* and *open space zones* within a 5-year period*;* b) disturb more than 100m³ (volume) of land per *site* in rural *zones* within a 5-year period; and c) alter the *original ground level* by more than 1 meter, measured vertically. This standard applies whether in relation to a particular *earthwork* or as a total of cumulative *earthworks* within the specified period. 5. Any *earthworks* must ensure that: a) Surface runoff from the *site* is isolated from other *sites* and existing *infrastructure*; and b) The potential for silt and sediment to enter the stormwater system or *waterbodies* in surface runoff from the *site*, is minimised; and c) Erosion and sediment control measures are installed and maintained for the duration of the construction period, where necessary. 6. Accidental Discovery Protocol (Schedule 10.2) to be followed for any accidental discovery of a *waahi tapu* or other cultural site. a) Accidental Discovery Protocol – should a *waahi tapu* of other cultural site be unearthed during *Earthworks* the contractor and/or owner must: - I. cease operations; II. inform local iwi; III. inform Heritage New Zealand and apply for the appropriate authority if required; IV. take appropriate action, after discussion with Heritage New Zealand, Council and Iwi to remedy damage and/or restore the site.	The proposal will otherwise comply with this rule and related standards. Resource consent is required under **Rule EW-R5** as a Restricted Discretionary Activity.
EW-R3 Earthworks in areas associated with NH-FLOOD-R4	Permitted standards 1. Any earthworks must ensure that: a) surface runoff from the subject site is isolated from other subject sites and existing infrastructure; and b) the potential for silt and sediment to enter the stormwater system or waterbodies in surface runoff from the subject site, is minimised; and c) erosion and sediment control measures are installed and maintained for the duration of the construction period, where necessary. 2. Archaeological Discovery Protocol to be followed for any accidental discovery of a waahi tapu or other cultural site. a) Accidental Discovery Protocol – should a *waahi tapu* of other cultural site be unearthed during *Earthworks* the contractor and/or owner must: - I. cease operations; II. inform local iwi;	**Will Comply** Earthworks will be managed to ensure compliance with this permitted rule framework.

District Plan Rule No.	Rule / Standard	Compliance
	III. inform Heritage New Zealand and apply for the appropriate authority if required; IV. take appropriate action, after discussion with Heritage New Zealand, Council and Iwi to remedy damage and/or restore the site.	
NATURAL HAZARDS		
NH-FLOOD-R3 New or relocated buildings (excluding minor buildings) in ponding, residual ponding and shallow surface flow areas.	The building floor level of any new or relocated building in the ponding, shallow surface flow or residual ponding area shall be constructed above the 1% AEP flood event level.	**Will comply** All buildings will be constructed above the 1% AEP flood event level.
NH-FLOOD-R4 Earthworks in Flood Hazard areas	1. In an overflow path or residual overflow path: a. NA b. NA 2. In ponding areas and shallow surface flow areas, earthworks: a. shall not involve the disturbance of more than $20m^3$ (volume) of land in any 10 year period; and b. shall not alter the original ground level by more than 1m measured vertically. 3. In a stream corridor or river corridor, earthworks: a. NA; and b. NA.	**Will not comply** The entire site is identified as being within the Flood Hazard ponding overlay. The proposed earthworks will not comply with the permitted standards within Rule NH-FLOOD-R4(2). The earthworks at the site consist of total cut volume of $11m^3$ to finished subgrade levels, total fill volume of $2,284m^3$ to finished subgrade levels, maximum cut height of 0.60m and maximum fill depth of 1.68m. Resource consent is required under **Rule NH-FLOOD-R11** as a Restricted Discretionary Activity
NH-FLOOD-R5, R6 and R7	Not applicable to this site.	**NA**
INFRASTRUCTURE		
INF-MENU-R27	1. Development must be undertaken in accordance with the Council's Land Development Minimum Requirements.	**Complies** Rule INF-MENU-R27 requires compliance with the Land Development Minimum Requirements (LDMR). The LDMR states that design must "meet the relevant standards and criteria of the district plan". As the district plan includes restricted discretionary rules for non-

District Plan Rule No.	Rule / Standard	Compliance
		compliance with permitted standards, these restricted discretionary rules are considered to be part of the "standards and criteria" of the district plan. Therefore, compliance is achieved with rule INF-MENU-R27.
INF-MENU-R28 Any new and relocated residential buildings on land where potable public water supply is available.	2. All new or relocated residential buildings where potable public water supply is available to a residential building must be fitted with one of the following: a. rainwater storage tanks with a minimum capacity of 10,000 litres for the supply of non-potable water for outdoor uses and indoor toilets; or b. rainwater storage tanks with a minimum capacity of 4,000 litres for the supply of non-potable water for outdoor areas and indoor toilets, and a greywater re-use system for outdoor irrigation. The greywater re-use system shall re-use all water from bathrooms (excluding toilets) and laundry washing machines. 3. The greywater re-use system […] 4. The greywater irrigation system […] 5. A greywater installers certificate […] 6. All new or relocated residential buildings where a rainwater storage tank supplies toilets must be fitted with separate plumbing, including backflow prevention devices, for these non-potable uses to prevent cross contamination of drinking water. Non potable water pipes between the rainwater tank and outlets (toilets and outdoor taps) shall be clearly labelled and coloured to differentiate them from potable water pipes and there shall be permanent non-drinking water signage over outdoor taps connected to rainwater tanks. Roof gutters are required to have leaf guards or screens and mosquito screens on all rain water tank vents. A restricted top-up from the public potable water supply will be provided to the tank to ensure that sufficient water to flush toilets is available. 7. Where a development will contain more than one residential building, e.g. a retirement home or village or a multi-unit residential development, a common rainwater storage facility with a volume of 10,000 litres per residential unit (as determined by the residential unit measurement criteria) can be provided so long as access to operate and maintain the facility is secured via an easement or it is located within an area of 'common property'. In both rainwater storage tanks and greywater re-use systems, backflow prevention must comply with the legislative requirements of the Drinking-water Standards for New Zealand 2005 (revised 2008), in particular, where connections to a potable water supply exist.	**Does not comply** The proposal does not achieve the required level of rainwater storage and supply of non-potable water. Standards 1 and 6 are not met as 3,000 litres of water for non-potable uses for each residential unit will be provided with no greywater re-use system. Standards 2, 3 and 4 are not met as no greywater re-use system is proposed. Standard 7 will be met. Resource consent is required under **Rule INF-MENU-R35** as a Restricted Discretionary Activity. The proposal will comply will all relevant standards of INF-MENU-R35.

District Plan Rule No.	Rule / Standard	Compliance
	Separation and/or backflow prevention between potable and non-potable systems will be required in residential situations to ensure that public health is not compromised by cross contamination from the use of non-potable water. No outdoor taps shall be connected to the potable public water supply. 8. Rainwater and greywater systems must be constructed in accordance with the Kapiti Coast Rainwater and Greywater Code of Practice 2012.	
COASTAL ENVIRONMENT		
CE-R1 and CE-R2	Public access and amenity structures in areas of outstanding natural character or areas of high natural character located within the General Residential, Rural, Natural Open Space or Open Space zones.	**NA** The site is not in an outstanding natural character or area of high natural character.
SUBDIVISION		
SUBDIVISION – DISTRICT WIDE		
SUB-DW-R7 Subdivision where any part of the land contains flood storage, ponding, residual ponding or shallow surface flow areas	Restricted Discretionary Activity, subject to standards below being met: 1. NA 2. The building area for each vacant allotment shall be located above the estimated 1% AEP flood event level. 3. Formed vehicle access does not adversely affect the 1% AEP flood hazard risk on other properties in the same flood catchment. 4. Compliance with all other relevant subdivision rules and standards in other chapters.	**Applicable** All buildings will be constructed above the 1% AEP flood event level. The proposal includes new access crossings at the front of the site where flood hazards are identified. However, it is anticipated that vehicle access will not adversely affect flood flows beyond the site. The proposal complies with all relevant standards of SUB-DW-R7 except standard (4) which requires compliance with all other relevant subdivision rules and standards in other chapters given. The proposed subdivision is therefore a discretionary activity under **Rule SUB-DW-R15**.
SUB-DW-R9	Subdivision (excluding boundary adjustments or subdivision of land where no additional lots are created) of land with peat or sand soils.	**Applicable** A Geotech assessment on liquefaction risk is included

District Plan Rule No.	Rule / Standard	Compliance
		with this application. The proposed subdivision is therefore a Controlled Activity under **Rule SUB-DW-R9**.
SUB-DW-R25 Controlled Activity Subdivision creating new allotments in the General Residential Zone and High Density Residential Zone that complies with all controlled activity standards under rule SUB-RES-R33.	Controlled Activity subject to standards below being met: *Hydraulic neutrality* 1. Stormwater systems must be designed to ensure that the stormwater runoff from all new impermeable surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when compared to the pre-development situation for the 50%, 20%, 10% and 1% Annual Exceedance Probability flood events. 2. Existing waterbodies and stormwater detention areas must be retained. *Underground Services* 3. Where any subdivision of land involves the construction of a new road or the extension of an existing road all electric, gas and telecommunication services to the land in the subdivision shall be reticulated underground. *Water Supply* 4. All new allotments, other than allotments for access, roads, utilities or reserves, where the allotments are in or adjoining areas which are served with a Council reticulated water supply, must be provided with a connection to the Council reticulated water supply laid to the boundary of the allotment. *Effluent Disposal* 5. All new allotments, other than allotments for access, roads, utilities or reserves, where the allotments are in or adjoining areas which are served by the public wastewater reticulation and treatment system must be provided with a piped sewage outfall for disposing of sanitary sewage to a reticulated system, laid to the boundary of each allotment. *Telecommunication and electricity supply* 6. Provision must be made to the boundary of each proposed allotment for a connection to a telecommunication network and energy supply network.	**Applicable** The subdivision will comply with Controlled Activity standards set out in SUB-DW-R25.
SUBDIVISION - RESIDENTIAL		
SUB-RES-R33 Controlled Activity	Subject to compliance with the following Standards: 1. Where the parent allotment contains an existing residential unit: a. the subdivision must not increase the degree of any non-compliance with Rules GRZ-R33, GRZ-R34, HRZ-R6 or HRZ-R7; or	**Not Applicable** The subdivision will not meet all relevant Controlled Activity standards. *Standard 1*

District Plan Rule No.	Rule / Standard	Compliance
	b. the subdivision must comply with an approved land use resource consent. 2. Where the parent allotment does not contain an existing residential unit: a. it must be demonstrated that it is practicable to construct residential units on the parent allotment that comply with Rules GRZ-R33, GRZ-R34, HRZ-R6 or HRZ-R7; or b. the subdivision must comply with an approved land use resource consent. 3. Each allotment must have legal and physical access to a legal road. 4. Each vacant allotment must have a flood free building area above the estimated 1% Annual Exceedance Probability flood event. *Minimum allotment size and shape factor* 5. Compliance with SUB-RES-Table 1. *Infrastructure, access and services* 6. Access, water supply, wastewater and stormwater drainage systems, and underground power and telecommunications must be provided in accordance with the Council's Land Development Minimum Requirements. 7. The maximum number of allotments gaining legal and physical vehicle access by rights of way shall be 6. 8. Access to all allotments must comply with the standards in the Transport chapter. 9. Within the General Residential Zone at Te Horo Beach […]. *Wastewater disposal – non-sewered allotments* 10. NA *County Road Ōtaki Precinct* 11. NA *Esplanades* 12. The Esplanade Reserve and Esplanade Strip provisions of SUB-DW-Table 1 must be complied with. *Financial Contributions* 13. Compliance with FC-Table 1.	N/A - The existing residential unit will be removed. *Standard 2* At the time of implementing the consent, all existing residential units will be removed from site. Given the underlying land area of each individual parcel, it is obvious that construction of residential units could be undertaken in compliance with GRZ-R33. In terms of the proposed allotments, the proposal includes an accompanying land use resource consent submitted for approval, which the subdivision is designed around. The proposal therefore meets this standard. *Standards 3 & 4* Compliance is achieved with Standards 3 and 4. *Standard 5* The minimum allotment size and shape factor are not applicable as the allotments are designed around the land use resource consent. *Standards 6 & 7* Compliance is achieved with Standards 6 and 7. *Standard 8* Access to the site will not comply with all standards in the Transport Chapter, and therefore fails to comply with Standard 8. *Standards 9-12* Not applicable. *Standards 13* Can be complied with.

District Plan Rule No.	Rule / Standard	Compliance
SUB-RES-R30 *Discretionary activity*	Any subdivision of land in the General Residential Zone or High Density Residential Zone which is not a controlled activity under SUB-RES-R25 or SUB-RES-R33.	**Applicable** The proposal requires resource consent as a Discretionary Activity under **Rule SUB-RES-R30** as it does not meet the standards under SUB-RES-R33.

3.2 Activity Status

Table 2: Activity Status of Land Use and Subdivision Consents from various rule triggers

Activity	Rule	Activity Status
Land Use	**Permeable Surfaces and Fence Height** Resource consent is required under **Rule GRZ-R12** as while the overall development site will achieve 30% permeable surfaces, each allotment will not have a minimum of 30% permeable surfaces. Consent is also required under this rule as a result of retaining/fence heights in the front yard.	***Restricted Discretionary Activity***
Land Use	**Building Standards** Resource consent is required under **Rule GRZ-R36** due to non-compliance with standards 4 [setbacks (relating to external stair structures], 5 [building coverage], 6 [outdoor living space], and 8 [outlook space] in GRZ-R33.	***Restricted Discretionary Activity***
Land Use	**Residential Units** Resource consent is also required under **Rule GRZ-R37** due to non-compliance with standard 1 [number of permitted residential units] in GRZ-R33.	***Restricted Discretionary Activity*** Public and limited notification under this rule is precluded.
Land Use	**Earthworks** Resource consent is required under **Rule EW-R5** as the proposal does not comply with Rule EW-R2 relevant to permitted earthworks.	***Restricted Discretionary Activity***
Land Use	**Earthworks in Flood Hazard Area** Resource consent is required under **Rule NH-FLOOD-R11** as a Restricted Discretionary Activity as the proposal does not comply with Rule NH-FLOOD-R4 relevant to earthworks in an identified flood hazard.	***Restricted Discretionary Activity***
Land Use	**Transport –Trip Generation** Resource consent is required under **Rule TR-R10** as a Restricted Discretionary Activity, as the number of daily vehicle movements constitutes being a "major traffic activity".	***Restricted Discretionary Activity***
Land Use	Resource consent is required pursuant to **Rule TR-R11** as a Discretionary Activity, as the proposal fails to meet the site access standards, specifically relating to reverse manoeuvres from Unit 5.	***Discretionary Activity***

Land Use	**Accessible Parking/Cycle Parking** Resource consent is required under **Rule TR-PARK-R32** as a Discretionary Activity as the proposal does not provide 1 visitor cycle park.	***Discretionary Activity***
Subdivision	Resource consent is required pursuant to Rule **SUB-DW-R25** as the subdivision will comply with Controlled Activity standards with regard to site servicing. In addition, the application includes geotechnical assessment thereby meeting the Controlled Activity standards of **Rule SUB-DW-R9**.	***Controlled Activity*** Public and limited notification under these rules is precluded.
Subdivision	Resource consent is required pursuant to **Rule SUB-DW-R15** as a Discretionary Activity as the proposal fails to meet all associated standards within SUB-DW-R7 and other rules.	***Discretionary Activity***
Subdivision	Resource consent is required pursuant to Rule **SUB-RES-R30** as a Discretionary Activity as it does not meet the standards within SUB-RES-R33.	***Discretionary Activity*** Public and limited notification under this rule is precluded.

3.3 Overall Activity Status

Overall, both the land use consent and the subdivision proposal require resource consent as a **Discretionary Activity**.

3.4 Scope

This application seeks resource consent in order to establish all aspects of the proposal.

If Council is of the view that resource consent is required for alternative or additional matters to those identified above, it has the discretion to grant consent to those matters as well as, or in lieu of those identified in this AEE.

3.5 Matters of Discretion

As the proposed land use consent and subdivision consent is for a Discretionary Activity, consideration can be had to any matter deemed relevant.

4. Notification Considerations

4.1 Public Notification – Section 95A

The matters to be considered when deciding whether or not to publicly notify an application are set out in Section 95A of the RMA and summarised below.

Step 1: Mandatory public notification in certain circumstances (sections 95A(2) and (3)

Determine whether the application meets any of the following criteria –

(a) The applicant has requested that the application be publicly notified;

(b) Public notification is required under Section 95C; or

(c) The application is made jointly with an application to exchange recreation reserve land under section 15AA of the Reserves Act 1977

Public notification is not required under Step 1.

Step 2: If not required by step 1, public notification precluded in certain circumstances (sections 95A(4), (5) and (6)

Determine whether the application meets any of the following criteria –

(a) the application is for a resource consent for 1 or more activities, and each activity is subject to a rule or national environmental standard that precludes public notification:

(b) the application is for a resource consent for 1 or more of the following, but no other, activities:

(i) a controlled activity;

~~(ii)~~ [Repealed by Resource Management Amendment Act 2020]

(iii) a restricted discretionary, discretionary, or non-complying activity, but only if the activity is a boundary activity;

~~(iv)~~ [Repealed by Resource Management Amendment Act 2020]

Public notification is not precluded under step 2 and the application must be tested for public notification under Step 3.

Step 3: If not precluded by Step 2, public notification required in certain circumstances

Determine whether the application meets any of the following criteria –

(a) the application is for a resource consent for 1 or more activities, and any of those activities is subject to a rule or NES that requires public notification;

(b) the consent authority decides, in accordance with section 95D, that the activity will have or is likely to have adverse effects on the environment that are more than minor.

The application is for a resource consent that does not require public notification under an NES or rule and the effects of the proposal will not be more than minor for the reasons assessed in Section 5, with the conclusions reached therein applicable to this assessment. Public notification is not required under Step 3.

Step 4: Public notification in special circumstances (section 95A(9))

Determine whether special circumstances exist in relation to the application that warrant the application being publicly notified.

No special circumstances exist in relation to the application that could warrant the application being publicly notified.

Section 95A Conclusion

Having regard to the four steps outlined within Section 95A, public notification of this application is not required.

4.2 Potentially Affected Persons – Section 95B

Section 95B relates to limited notification of consent applications and the relevant steps are summarised below.

Step 1: Certain affected groups and affected persons must be notified (Sections 95B (2) and 95B (3))

Determine whether there are any—

(a) affected protected customary rights groups; or

(b) affected customary marine title groups (in the case of an application for a resource consent for an accommodated activity).

Determine—

(a) whether the proposed activity is on or adjacent to, or may affect, land that is the subject of a statutory acknowledgement made in accordance with an Act specified in Schedule 11; and

(b) whether the person to whom the statutory acknowledgement is made is an affected person under section 95E.

Notify the application to each affected group identified under subsection (2) and each affected person identified under subsection (3).

The application is not considered to affect any of the parties outlined within Step 1, nor is it located on, adjacent to, or may affect land that is subject of a statutory acknowledgement. Limited notification is not required at Step 1.

Step 2: If not required by step 1, limited notification precluded in certain circumstances

(a) the application is for a resource consent for 1 or more activities, and each activity is subject to a rule or national environmental standard that precludes limited notification:

(b) the application is for a controlled activity (but no other activities) that requires consent under a district plan (other than a subdivision of land):

Limited notification is precluded by some, but not all, of the relevant rules breached. Therefore, limited notification is not precluded under Step 2.

Step 3: If not precluded by step 2, certain other affected persons must be notified (Sections 95B (7) and 95B(8))

Determine whether, in accordance with section 95E, the following persons are affected persons:

(a) In the case of a boundary activity, determine in accordance with section 95E whether an owner of an allotment with an infringed boundary is an affected person; and

(b) In the case of any other activity determine whether a person is an affected person in accordance with section 95E.

The application is not for a boundary activity only. It is considered that any effects arising from the proposal on any other party in accordance with section 95E are less than minor for the reasons set out in **Section 5** of this AEE. As such limited notification of the application to affected persons is not required under Step 3.

Step 4: further notification in special circumstances (Section 95 (10))

Determine whether special circumstances exist in relation to the application that warrant notification of the application to any other persons not already determined to be eligible for limited notification under this section (excluding persons assessed under section 95E as not being affected persons), and,—

a) if the answer is yes, notify those persons; and

b) if the answer is no, do not notify anyone else.

No special circumstances exist in relation to the application that could warrant the application being limited notified.

Section 95B Conclusion

Having regard to the steps outlined within Section 95B, limited notification of this application is not required.

5. Assessment of Environmental Effects

5.1 Scope

The following section presents an assessment of environmental effects (AEE) in accordance with Schedule Four of the RMA. The AEE is comprised of the following components:

- Positive Effects
- Permitted Baseline
- Streetscape and Character Effects
- Residential Amenity Effects
- Earthworks Effects
- Natural Hazard Effects
- Transport Effects
- Subdivision Effects
- Servicing Effects
- Construction Effects
- Cultural Effects

5.2 Positive Effects

The proposal will result in the supply of 17 new residential units that will be located in an area identified for residential development. The proposed development will provide a smaller low-maintenance residential typology that will complement the predominant housing typology that is otherwise currently provided for in the district. The development will assist with the provision of residential dwellings to meet identified demand for urban growth. The proposed development will represent an efficient use of the residentially zoned land resource and infrastructure through the use of existing urban services.

This is considered to represent a positive use of a valuable resource and can be considered a positive environmental effect resulting from the proposal.

5.3 Permitted Baseline

When determining the extent of the adverse effects of an activity or the effects on a person respectively, the Council may disregard an adverse effect if a rule or national environmental standard permits an activity with that effect. The permitted activity baseline applies to consideration of both who is affected and whether effects are or are likely to be more than minor.

The District Plan permits built development on a site. In this case, the application site comprises three adjoining residential properties. To proceed without a resource consent, up to three large residential units could be built on each site, provided the buildings did not exceed 50% building coverage, are less than 11m in height, comply with the 4m + 60° recession plane control, are setback 1.5m from the front boundary and 1m from all other boundaries, and maintain a minimum of 30% of the site as permeable surface. Retaining walls and fences located along boundaries with a combined maximum height of 2m are permitted, or 1.8m along the front boundary.

Based on the underlying site topography, this could include three large multi-storey units on each allotment. Each allotment could accommodate up to 404.5m² of buildings, which would translate to 1,213.5m²

cumulatively across the three sites. Each unit must also be provided with 20m² of outdoor living space that is no less than 3m in dimension and an outlook space of 4m x 4m from the principal living room and 1m x 1m from all other habitable rooms. Unit(s) facing the street must meet 20% glazing, and the site should achieve a minimum 20% landscaped area. The proposal would be required to comply with the water supply and re-use requirements for residential units. The proposal must also comply with the transport standards and the earthworks standards along with the natural hazards provisions. To ensure compliance with the natural hazard provisions, a permitted baseline scenario would likely consist of units being constructed on elevated pile foundations.

Despite consent being required in this case for the construction of more than three residential household units, it is considered that the MDRS development controls relating to the bulk and location of buildings establish the anticipated building envelope and are a useful guide as to what scale of development can reasonably be anticipated in this location.

The effects of the permitted baseline can be considered against those of the proposed development.

The District Plan does not provide for subdivisions to be undertaken as a permitted activity.

5.4 Streetscape and Character Effects

The proposal is for the redevelopment of the three contiguous sites with 17 new townhouses. The new townhouses will be arranged on the site in six 'blocks' plus a single townhouse. The block of units along the frontage are two separate duplexes and a single townhouse. These units along the frontage face toward the street. Behind the front units there are four further blocks that alternate in orientation from east-west to north-south alignments. The driveway is along the southern side boundary, which is adjacent to the existing driveway to 22 Eruini Street. The proposed driveway provides access to 11 parking spaces that are within the shared parking area, and also access to the garages serving Units 1-4. The new townhouses would be two storeys high with varied roof forms.

The application includes an Urban Design Assessment, attached at **Appendix E** which concludes that overall, the development meets the outcomes sought by the urban design principles within the Residential Design Guide (RDG) and is compatible with the planned urban built character for the area. This is supported with a comprehensive Landscape Plan at **Appendix D**. Additional assessment is provided below, providing a further planning lens to this matter.

This area of Waikanae Beach is a well-established residential environment, with Eruini Street having been subject to residential subdivision and land development in the 1960s. Land to the west (including adjacent properties in Whitmore Grove) was subdivided and developed slightly later, in the 1970s. The established development and subdivision pattern generally reflects a residential suburban character typical of this era. In this regard, the immediate neighbouring area is characterised by properties with residential buildings that are located slightly back from the road frontage. While these properties were always zoned residential under the previous District Plan, recent changes to the District Plan (triggered by the NPS-UD 2020) have rezoned the area to enable medium density residential housing.

As directed by the National Policy Statement of Urban Development (NPS-UD), and acknowledged in the relevant planning provisions, the residential urban environment is anticipated to change as additional housing supply is provided. The planned urban built environment in this zone is one that includes medium density housing, comprising a mix of typologies including detached housing, terrace housing, and walk up apartments, to a built form of 3 storeys. The corresponding District Plan rule framework reflects and enables this outcome. In this regard Policy 6(b) of the NPS-UD, which Council's must take into account in their decision-making,

specifically recognises that notable changes to perceived character and amenity of existing urban environments resulting from the greater enablement of development envisaged by the NPS-UD will occur, which:

a. May detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
b. Are not, of themselves, an adverse effect.

Therefore, while it is acknowledged that the District Plan requires consideration to be given to the wider resource management issues, such as natural hazards in resource consent applications, this is to ensure such new development does not inappropriately give rise to increased harm from the occurrence of such hazards. Outside of this, the District Plan introduces and enabling framework toward residential development, which gives effect to national direction. This requires greater consideration to be given to how a proposal aligns with the planned urban built environment, rather than requiring the maintenance of existing amenity levels and character. It is acknowledged, however, that any proposal reflecting the planned built form, would technically require resource consent for design based considerations; however, effects upon residential amenity of adjacent parties would not be a relevant matter for consideration in any such design based assessment. The assessment below is informed and framed by the policy direction within the General Residential Zone.

The proposed built form associated with this development comprises multiple building forms, including detached units, semi-detached units, and terrace housing. All units will have a 2-storey built form. The overall building footprint (including elevated decks) will be 1,040.38m² across the site. High quality landscaped areas will be arranged around the buildings, which will help the built development integrate into its surrounds. The proposed buildings comply with all building density standards that are applicable to external boundaries (although it is acknowledged that the external stairs providing access to outdoor service areas will in some cases be marginally inside the 1m setback).

The development, building design, siting, and external appearance have been carefully designed to align with the planned urban built character, and to achieve the streetscape and amenity outcomes sought by the District Plan for the zone. The proposed built form associated with this development signals the emergence of more intensive residential development in this area and is consistent with the planned urban built form and anticipated character of the General Residential Zone.

The proposed design has used a combination of methods to provide for a development that addresses the street. This includes the placement and design of windows, quality landscaping, building setbacks, modulated building and roof forms and non-uniform facades. This approach will ensure the development does not display inappropriate visual dominance and will provide for passive surveillance of the street and within the development itself.

The proposed landscaping will contribute soft features which will complement the visual appearance of the buildings and hard surfacing spaces so that the appearance of the development form and density is attractive to the occupants of the site and also from a streetscape and neighbouring property perspective. The proposed landscaping incorporates species that will be both fit for the spaces allocated, and appropriate for the local climate and growing conditions. As such, it is considered that an attractive setting will be maintained.

The raised finished floor level and retaining at the street frontage provides separation between the public and private interfaces, providing a clear delineation between these spaces, and allowing residents to look out and over to provide passive surveillance, while minimising direct views in. While there will be sections of overheight retaining and fencing along the streetfront outside Units 1-4 as a result, it is noted that the retaining element will range between 0.86m and 1.1m in height, with the overheight element resulting from the fence above. The

fencing on top of the retaining structure has been kept low and semi-permeable to create a positive relationship to the street, and climbers are used for visual screening and softening along the interface.

To minimise vehicle dominance at the street edge, vehicular access for the majority of units is accessed via a shared pedestrian and vehicle accessway to the south of the site. The proposed landscaping will provide a softened aspect to the development with street edge planting, and planting within the shared access cleverly design to screen servicing and parking areas and break up the extent of hard surfacing.

The Urban Design Assessment provides an assessment of the proposal against the Residential Design Guide and makes reference to the built form and design of the proposal in relation to the Residential Design Guide criteria and concludes:

"The proposal is sympathetic to the local environment and is consistent with the outcomes sought under the design guide. Care has been taken to ensure that the design will follow the KCDC Residential Design Guidelines appropriately. The proposal will result in a high-quality design that contributes to the existing and future character of Waikanae Beach and will provide an attracting and comfortable living environment for users, residents, and visitors. Overall, it is considered that given the design measures that have been incorporated into the layout of the development, any potential residential character or visual amenity effects arising from the proposal will be minimal, and the development will provide a positive contribution to the neighbourhood".

Ultimately, the proposed development is consistent with the design objectives and outcomes sought under the RDG. I further note that the proposal accords with the planned urban built form and character anticipated in the zone.

Based on the above, and the accompanying urban design assessment against the RDG, the resulting streetscape and visual effects of the proposal are considered to be less than minor and acceptable.

5.5 Residential Amenity Effects

5.5.1 External residential amenity values

Residential amenity includes factors such as shading, privacy, bulk and dominance. The height in relation to boundary controls and setback standards are intended to provide privacy and a degree of separation between buildings and allow a reasonable amount of daylight and sunshine to reach neighbouring sites. Building coverage together with private open space are the main tools used to control development density. Building height controls manage bulk and dominance and shading effects.

As discussed further above, the natural hazard overlays and provisions are included in the District Plan for the purpose of managing the effects of the natural hazard; they are not an additional tool to reduce or manage broader effects, such as amenity and character effects. Therefore, as it is sufficiently demonstrated that that the risks associated with the associated natural hazards can be mitigated, it is appropriate to consider the bulk and location rules that apply to residential development in the zone to frame the assessment as to the scale and significance of the actual and potential amenity effects on neighbouring sites. This is informed both by discounting effects that may arise from a Permitted Baseline development scenario, while also considering the proposal and resulting effects in the context of the planned urban built form enabled within the General Residential Zone.

While the neighbours will notice a change to the current site, the proposed townhouses are generally designed to comply with the General Residential Zone rules and the buildings are located to minimise shading and privacy effects for the neighbours. Therefore, the proposed townhouses are consistent with the District Plan's expectation for redevelopment of the area and the associated emergence of an evolving character of the area to achieve additional housing, including housing that reflects a medium density typology.

To meet minimum floor levels, and also to integrate a foundation system that is appropriate to the ground conditions, it is proposed to excavate and install gravel raft foundations below the current ground surface, and raise the ground level. Nevertheless, the proposed townhouses comply with the District Plan bulk and location standards (with the exception of external stairs providing access to rear yard service areas, which are located just shy of 1m from external boundaries).

Amenity values are inherently anticipated to change and adapt to development where it reflects a built form that corresponds with the planned urban built environment. In this regard it is noted that the proposal reflects a lower scale of built form compared to that which is enabled within the underlying residential zone framework and the building density standards of the District Plan (being two storeys in form, rather than three). From this, it can be deduced that the scale and level of effect resulting from the proposed development is of a lesser extent that that which is enabled and anticipated within this residential urban environment.

With the exception of housing numbers and staircases, the proposed design complies with all building density standards applicable to the underlying site that control effects at the external boundaries. It is therefore considered that any potential shading, privacy and dominance effects beyond the site will be consistent with those that could be generated by building(s) that are of a scale and intensity enabled in a medium density residential environment. To be clear, it is noted that the three-unit threshold for permitted activities in the medium density zone of the District Plan is an urban design-based trigger, i.e. it is placed to ensure urban design considerations are taken into account for residential developments. It is not an external amenity control and is not intended to indicate the level of intensity that may be appropriate within a site. Similarly, the outdoor living space and outlook space controls are to ensure adequate provision is made for *internal amenity*, again noting this is not an external amenity control.

Effects on adjacent sites are considered in this context and discussed below.

Adjoining properties

The site adjoins 14 Eruini Street to the north, 22 Eruini Street to the south, and 13, 15, and 17 Whitmore Street to the west. 15, 17, and 19 Eruini Street are located opposite the application site on the eastern side of Eruini Street. The adverse residential amenity effects on these properties will be less than minor for the following reasons:

<u>14 Eruini Street</u>

14 Eruini Street is located to the north of the application site. An existing 1.8m fence is located on the common boundary with the application site, which provides good screening between the sites. The site at 14 Eruini Street accommodates a large dwelling located generally centrally within the property, although in close proximity to the boundary with 16 Eruini Street. The dwelling has an original two storey form, and a single level rear addition. The internal layout of this dwelling appears to capitalise on its north facing outlook, with the upper level lounge and primary habitable spaces (including an outdoor deck area) oriented away from the application site toward the north. Based on building plans for 14 Eruini Street, it would appear that the service areas of the dwelling (e.g. toilet, bathroom, laundry, internal stairs, and kitchen) are located on the upper level of the building in proximity to the boundary with 16 Eruini Street (this can be seen on Sheet 27 of the application plans). There are limited windows on the south elevation of the upper level of 14 Eruini Street. While the lounge also appears to extend along this part of the dwelling, there are no south facing windows from this area, looking toward the application site. Based on this, it is determined that intervisibility, and privacy effects will be suitably mitigated between the sites.

The site and dwelling within 14 Eruini Street will be located adjacent to proposed Units 5-10, which are arranged in three building blocks (which is similar to a permitted built form of three large dwellings within a site). These units are comfortably compliant with the external bulk and location building standards of the District Plan that are intended to manage amenity effects beyond the site boundary.

At their closest point, Units 5 and 6 will be setback from the common boundary with 14 Eruini Street by 1.22 and 1.81m respectively, in full compliance with the District Plan requirements. The buildings accommodating Units 7-10 will be set back 4m from the common boundary with 14 Eruini Street, although the upper level decks will range between 1.5m to 2m from the boundary, again in full compliance with the District Plan requirements. Notwithstanding compliance, the proposed design has intentionally limited unreasonable overlooking from the proposed units into this adjacent site from the upper level deck areas. In this regard, the decks on Units 7-10 incorporate partial privacy screening, which will assist with directing outlook away from and over the dwelling at 14 Eruini Street. This privacy treatment and directional viewing can be seen on Sheet 27 of the application plans at Appendix B. No privacy treatment is incorporated into the upper level deck areas of Unit 6 and Unit 5, as these decks are oriented away from the dwelling and sensitive amenity spaces within 14 Eruini Street (see sheet 8 in Appendix B). When considered against the context of the planned urban environment (which includes three storey residential buildings), the bulk, dominance, and shading effects of the proposal on Eruini Street will be less than minor.

Privacy and overlooking effects on this property are minimised through the screening of outdoor living spaces through fencing and planting, and the compliant height and setback from the shared boundary. Privacy and overlooking effects of the proposal on 14 Eruini Street will therefore also be less than minor.

For these reasons, the proposal will have less than minor effects on 14 Eruini Street, and persons associated with this property are not considered to be adversely affected by the proposal.

13, 15 and 17 Whitmore Grove

13-17 Whitmore Grove are located to the west of the application site.

13 Whitmore Grove accommodates a single storey dwelling, with site frontage and access to Whitmore Grove, which is a cul-de-sac road to the southwest. An accessory building and service yard is located to northeast, between the dwelling and the application site. The accessory building appears to be built to the site boundary, and a 1.8m fence otherwise runs along the common boundary.

13 Whitmore Grove will be located adjacent to proposed Unit 10, although due to site layout, proposed Units 11-14 may also be clearly perceived given their relative proximity, although these will have a lesser degree of impact. The remaining units proposed will be set back a greater degree and substantially screened by the aforementioned units closest to 13 Whitmore Grove. At its closest point, Unit 10 will be setback from the common boundary by 1.99m. The outdoor living space associated with Unit 10 is an elevated deck at the first floor, to take advantage of long range views. The proposed deck on Unit 10 is generally oriented away from 13 Whitmore Grove, with any outlook being above and beyond this adjacent site.

Noting that the proposed units will sit atop engineered fill, to achieve minimum floor levels, the development will nevertheless easily comply with the applicable 11m height limit in this zone. While the proposed units will be two-storey across the development this is not an uncommon building height in a residential environment. The proposed units are comfortably compliant with the external bulk and location building standards of the District Plan that are intended to manage amenity effects beyond the site boundary. When considered against the context of the planned urban environment, the bulk, dominance, and shading effects of the proposal on 13 Whitmore Grove will be less than minor and persons associated with this property are not considered to be adversely affected by the proposal.

15 Whitmore Grove accommodates a modern double gable pavilion style dwelling, which has extensive hard and soft landscaping and associated outdoor areas around the dwelling. The ground level within this adjacent site appears to have been built up, which is evident at the boundary with the application site where there is a retaining wall and fence atop, with a combined height of approximately 2.4m from the ground level within the application site. It is intended that this fence will remain in place. This property adjoins the site known as 18 Eruini Street, which is the middle section of the overall application site. The building containing Units 11 to 14 will directly adjoin this adjacent site, although wider visibility of Units 10, and 15-17 will also be possible, noting the application site's western boundary is very wide and incorporates three adjoining land parcels. Figure 4 shows this in context below.

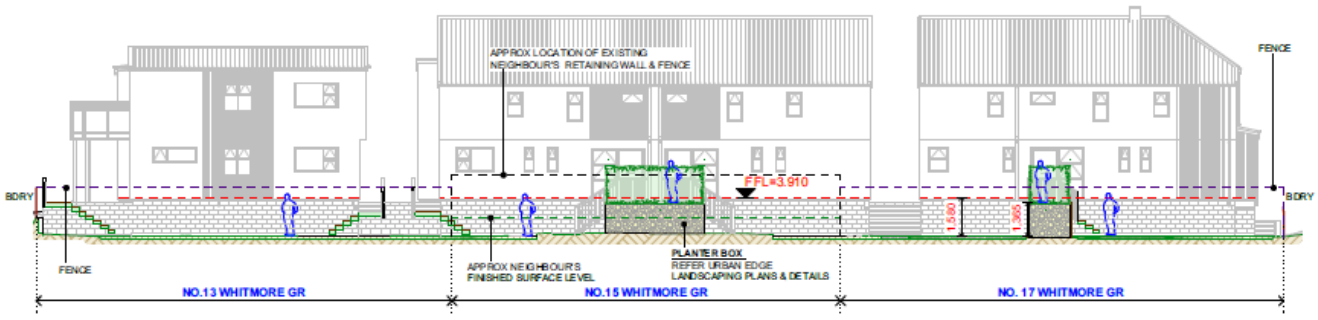


Figure 4. South west boundary elevation. Source: Application plans, sheet 15.

17 Whitmore Grove accommodates a dwelling located centrally within the site. Two accessory buildings are located near to the common boundary with the application site. This adjacent site contains established vegetation along the boundary with the application site and an existing fence ranging between 1.8m to 1.85m runs along the common boundary. This property adjoins the part of the application site known as 20 Eruini Street, which is the southernmost section of the overall application site. The building containing Units 15 to 17 will directly adjoin this adjacent site, although wider visibility of Units 10 to 14 will also be possible based on the orientation of the dwelling within 17 Whitmore Grove, and noting application site's western boundary is very wide and incorporates three adjoining land parcels.

In terms of any potential bulk and dominance, or shading effects, it is noted that the building form as perceived from 15 Whitmore Grove and also from 17 Whitmore Grove is also similar to a permitted form of development on the underlying sites. The building accommodating Units 11-14 will be setback approximately 2m from the common boundary with 15 Whitmore Grove thereby easily compliant with the District Plan yard setback requirements. Similarly, Units 15-17 will be set back from 17 Whitmore Grove by 1.7m to 2m. A skillion roof form is integrated into the design of Units 11-16, to assist with achieving compliance with the underlying bulk and location standards relating to external boundaries, while also providing opportunity for internal spaciousness and light into the upper levels of the proposed units. Ultimately, the proposed buildings are compliant with the external bulk and location building standards of the District Plan that are intended to manage amenity effects beyond the site boundary. When considered against the context of the planned urban environment, the bulk, dominance, and shading effects of the proposal on 15 and 17 Whitmore Grove will therefore be less than minor.

The application site will be partially built up to provide flood free floor levels. While this will elevate the overall building height of the proposed buildings within the application site, the final built form will remain as a recognisable two storey form that will be easily compliant with the permitted building height. The built up land will be set back from the common boundary with 13-17 Whitmore Grove, ensuring no obtrusive bulk or retaining

at the boundary. It is also noted that the ground level at the boundary will generally remain the same, and will continue to be lower than within the adjoining site at 15 Whitmore Grove.

Privacy and overlooking effects on these properties are minimised through the siting of all primary living spaces and outdoor areas associated with Units 11-17 at ground level, and to the east, enhancing the daylight access and spaciousness within these areas while minimising interaction and outlook to the adjacent sites on Whitmore Grove. Bedrooms and bathrooms at the upper level. On the upper level the windows are from bedrooms or bathrooms. Thus these upper level windows are not from a main living area where people would congregate such that over-looking and loss of privacy to the neighbours would be significant. In this way the design minimises overlooking opportunities and loss of privacy to the neighbours. In addition, the rear service areas of these units will have the additional screening with landscaping. Again ensuring that over-looking opportunities and loss of privacy from the stairways and service areas for the neighbours are also minimised. While it is acknowledged that the external staircases providing access to the rear service areas will marginally breach the 1m setback, resulting privacy and overlooking effects will be of no great consequence, given the transitional nature of staircases, and small landing areas associated with these functional spaces. Privacy and overlooking effects of the proposal on 13-17 Whitmore Grove will therefore be less than minor.

For these reasons, the proposal will have less than minor effects on 13-17 Whitmore Grove, and persons associated with these properties are not considered to be adversely affected by the proposal.

<u>22 Eruini Street</u>

22 Eruini Street is located to the south of the application site and accommodates a dwelling that is set back approximately 4m from the shared boundary with the application site, with an accessory building also located in proximity to the shared boundary with the application site. Similar to the subject site, this property has access directly from Eruini Street Road.

The dwelling within 22 Eruini Street is generally oriented toward the application site, to take advantage of sun and amenity provided due to an existing undeveloped rear section of 20 Eruini Street[4]. The dwelling within 22 Eruini Street will be located adjacent to proposed open carparking area and driveway, which will continue to provide a sense of openness to this site, while also allowing good levels of sunlight access to the dwelling and outdoor area. The building accommodating Unit 17 will be the closest to 22 Eruini Street, although this will generally be situated alongside the accessory building in the rear yard of 22 Eruini Street. The remaining units proposed within the proposed development will be set back a greater degree. No units will directly be located near the dwelling within 22 Eruini Street, although this dwelling may have visibility of the majority of units within the development, albeit from some distance. This visibility will be minimised by the boundary fence that runs along the shared boundary with 20 Eruini Street within the application site, which varies in height between 1.6m and 2.4m.

All units within the proposed development will be compliant with the external bulk and location building standards of the District Plan that are intended to manage amenity effects beyond the site boundary.

The proposed double storey building containing Units 15-17 is situated away from the dwelling within 22 Eruini Street, although it is located adjacent to an accessory building within that property. Again, these units will readily comply with the District Plan's height and height in relation to boundary standards. When considered against the context of the planned urban environment (which includes three storey residential buildings), the bulk, dominance, and shading effects of the proposal on 22 Eruini Street will be less than minor.

[4] Benefitting from a concept known as "borrowed amenity".

Privacy and overlooking effects on this property are minimised through the siting of all internal living spaces at the ground level of the proposed units (insofar as they relate to this property), the screening of outdoor living spaces through fencing and planting, and the compliant height and setback from the shared boundary. While it is recognised that the elevated building platforms within the development will increase the overall ground level and associated outdoor areas, the interface with 22 Eruini Street has been specifically considered in the design to minimise any potential overlooking from the outdoor amenity space of Unit 17. In this regard, the outdoor area for Unit 17 is set down at a lower level compared to the remaining outdoor areas associated with Units 11-16. Privacy and overlooking effects of the proposal on 22 Eruini Street will therefore be less than minor.

For these reasons, the proposal will have less than minor effects on 22 Eruini Street, and persons associated with this property are not considered to be adversely affected by the proposal.

15, 17, and 19 Eruini Street

These properties are located to the northeast of the application site, across the Eruini Street carriageway. The sites accommodate residential units, which are in part orientated towards the application site, although they are generally well set back from the street frontage. Dwellings in these sites will have views towards the two storey form of Units 1-5, and these townhouses will largely obscure the remaining townhouses from these properties. In this regard, the altered view of the proposed townhouses is comparable to a permitted baseline across the three properties comprising the wider application site. Given the separation distance, any potentially resulting effects will be negligible in nature. Overall, the proposed development will result in less than minor effects upon the residential amenity of occupants and owners of 15-19 Eruini Street, noting that a change in urban built form is anticipated in this location.

Any Other Person/Property

Effects on parties beyond those identified above are also considered to be less than minor, noting separation distances and intervening building forms.

With the proposed development being two storeys, and meeting the building density standards that manage external effects, any resulting privacy effects are considered to be less than minor. In this regard, it is noted that the design of the proposed units and associated outdoor spaces is consistent with the design objectives within the Residential Design Guide, as discussed in further detail in **Appendix E**.

While the proposed development results in a higher yield on the site than is currently found in the local area, it is a residential development that the District Plan anticipates for the site through general compliance with the General Residential Zone rules and also the Residential Design Guide.

Based on the above, the effects of the proposal upon residential amenity values, taking into account the planned urban built environment and associated amenity values anticipated within the zone will be less than minor and acceptable.

5.5.2 Internal Residential Amenity Effects

Being a multi-unit proposal, a design statement and assessment is required against the RDG, which has been provided in the accompanying Urban Design Assessment at **Appendix E**. This statement provides a comprehensive assessment of the proposal and its alignment with the RDG. The Urban Design Assessment should be read in conjunction with this AEE.

Private open space and outlook are the main tools used to control amenity values within the site. For the most-part, the proposal generally adheres to the MDRS onsite amenity controls relating to outlook space and onsite outdoor living space standards, the latter of which requires provision of a 20m² outdoor open space (min 3m

dimension) for each unit at ground level. Further to this, the outdoor living spaces are oriented to maximise sunlight access and to avoid internal shading effects. Each of these is directly connected to the main living space.

Appropriate internal amenity outcomes are considered to be achieved for the following reasons:

- Each unit provides for self-contained residential use and incorporates provision for indoor and outdoor living, sleeping facilities, a kitchen, and appropriate services (bathroom, laundry, and waste collection).
- As discussed in **Appendix E**, the proposal achieves appropriate onsite urban design outcomes with due consideration for daylight, sunlight and privacy. This accords with the requirements of the RDG and demonstrates that a quality onsite living environment will be achieved. I generally defer to the expertise of Ms Reid, the applicant's urban designer, and concur with her findings relative to urban design outcomes are per **Appendix E**.
- The proposal achieves appropriate daylight and sunlight access by positioning the internal and outdoor living areas to optimise sunlight access. This has the additional benefit of supporting passive heating, while good ventilation is also provided.
- A number of small non-compliances are generated by the proposal in respect of the outdoor living spaces. However, Units 5-6 are provided with a north-facing balcony direct from the internal living space that is larger than the minimum required for units without ground floor living space, and will comfortably accommodate items such as outdoor furniture. This will be supplemented by additional service and/or living courts at the ground floor as well as the primary upper-level balcony. Each of Units 9, 11-13, and 16 technically fail to meet the minimum size dimensions, however the shortfall is considered to be of no consequence, noting these areas range between 18.18m³ and 19.09m² instead of the required 20m².
- The outdoor living spaces and landscaping have been designed by a landscape architect, with plans provided at **Appendix D**. The design and layout therefore foster usability and functionality for residents and will be low maintenance. Each outdoor living area will be fit for passive recreational use. Moreover, the site is well located to public reserves and the beach. Thes public spaces all provide opportunity for more active recreational activity. The development complies with the required 20% landscaping, with planting designed and positioned to support onsite amenity within private and common spaces. Planting includes a mix of specimen trees, providing immediate vertical greening and softening to the development.
- Shortfalls with the required outlook space are proposed for Units 5, 6, 12, 13, and 16, however the outlook breach will be indiscernible and will not impact on internal amenity outcomes. While these units cannot achieve the 4m outlook width from their primary internal living spaces, this is technical only. A 4m x 4m outlook can be achieved, but **not** when centred on the largest expanse of glazing; the doors are off centre within the relevant façade. Nevertheless, a 4m wide and 4m deep outlook is afforded. For Units 12, 13, and 17 this is over the private outdoor living spaces and will therefore provide a pleasant aspect to each dwelling. For Units 5 and 6, the outlook is afforded over a generous balcony and surrounding airspace. This will provide a sense of spaciousness and is oriented to ensure positive daylight and sunlight access. The outlook shortfalls will not result in adverse internal privacy effects.
- Boundary fencing will continue to achieve appropriate privacy between adjacent sites and along internal boundaries within the development.

- Hard and soft landscaping throughout the site ensures that the development will be integrated into the site, with plants screening and softening the appearance of the dwellings and retaining structures as they mature. Fencing also ensures an appropriate balance between privacy and passive surveillance. Landscaping will be undertaken in accordance with the proposed landscaping plans in **Appendix D**. Hard surfacing and fencing will be utilised to define separate spaces and create privacy within the development, while planting is proposed to soften the site and provide additional privacy.

Ultimately, for the reasons noted above, and discussed within the comprehensive Urban Design Assessment, the design of the proposed development is considered to be consistent with the design objectives of the RDG and will result in the supply of modern housing that will provide for a quality living environment that will support the health and well-being of future occupants.

Accordingly, the internal amenity effects of the proposed development will be less than minor and acceptable.

5.6 Earthworks effects

Effects arising from the earthworks such as dust, silt, and sedimentation, can be appropriately managed and mitigated by adherence to best practice earthworks methodologies and standard conditions of consent, which are anticipated to be imposed by Council and proffered as part of this proposal. The proposed earthworks and associated silt and sediment controls will be undertaken and installed in accordance with the guidance in the *Kapiti Coast District Council Land Development Minimum Requirements*. In summary, the earthworks will:

- Be consistent with the policy framework of the District Plan, despite not meeting relevant standards for a permitted activity;
- Be safe, stable and geotechnically sound;
- Not unnecessarily alter the natural land form or interfere with natural features;
- Provide accessible building areas within a vacant site;
- Control surface and ground water flows both during and after construction;
- Control sediment generated by the works; and
- Not cause undue nuisance from silt, dust, noise or disposal of vegetation.

Sediment control measures will be installed for the duration of the site development works as necessary (refer to the proposed erosion and sediment control details on Drawing 2300 contained in Appendix 1 of the Engineering Plans within the Infrastructure Report at **Appendix H**). These measures will be implemented in accordance with industry best practice as per the Greater Wellington's Erosion and Sediment Control Guidelines for the Wellington Region. Therefore, any associated effects are considered to be less than minor.

In some parts, the site will be raised using engineered fill material by up to 1.6m (including installation of gravel raft foundations), which is required to meet minimum floor level requirements. The application is accompanied by a Geotechnical Assessment (and related supplementary statement), which confirms that the underlying ground conditions are suitable to accommodate the proposed development, and proposed services. This assessment also notes that slope stability is not a risk at the site. The earthworks will be retained onsite by low level retaining walls and stability effects are considered to be less than minor.

The proposed earthworks are required to be undertaken in order to facilitate the development of the proposed housing development. Visual effects from the earthworks will be temporary in nature throughout the

construction phase and they will be covered by a combination of the units, retaining walls, hard surfaces, and the proposed landscaping.

The site is not recorded as being in a water collection area. The site is not subject to any Environmental Management Plan or Structure Plan.

For the reasons above, any temporary or long term effects of the proposed earthworks will be less than minor on the surrounding environment.

5.7 Natural Hazard Effects

The site is within the Flood Hazard (Ponding) Overlay within the District Plan maps. Surrounding properties are also identified as being within this overlay. The Recommended Building Level (RBL) for the site is RL 3.76 m based on the Wellington 1953 Datum[5]. This RBL is specified to underside of joist or slab and includes an allowance of 300 mm for freeboard to provide additional protection against potential flooding. Further details regarding the flood risk can be found in the Envelope Flood Risk Assessment report, dated 27 November 2024 (**Appendix F**).

The potential flood risk has been considered in the design of the earthworks. Minimum floor levels have also been considered in the design to reduce risk. Proposed finished floor level for the development is FFL = 3.91m for the residential dwellings. The exception to this is the garage for Unit 5, which will have a lower finished floor level of 3.19m aMSL, below the recommended 3.4m as advised by Wellington Regional Council. This is to allow transitions for vehicles. Inundation effects will impact the garage only, and are expected to be minimal. The advice from GWRC is that the ponding level is 3.4m aMSL; this would equate to 0.21m of potential flood depth within the garage (although, this is a conservative level, noting GWRC flood modelling incorporates a 300mm freeboard within its stated flooding levels). Garages are also non-habitable spaces, expected to be utilised for storage, parking and similar. It is anticipated that the lower portion of the garage will be formed of concrete to mitigate structural integrity/damage issues from any infrequent flood events; this will be incorporated at the time of building consent. This depth of flood waters would not damage the mechanical functioning of a typical vehicle. Potential onsite flooding effects are therefore considered to be appropriately mitigated and resulting effects will be acceptable.

Onsite soak pits are also proposed to be installed to achieve stormwater neutrality. In combination with the compliant permeable surface across the overall site (30% overall), it is anticipated that stormwater management will not create or exacerbate inundation effects.

With respect to offsite flood hazard risk, based on the assessment within the Envelope Engineering Flood Risk Assessment (**Appendix F**) the proposal is considered to have a less than minor effect. The proposal will achieve hydraulic neutrality and meet the required levels of permeable surfaces across the underlying development site. The Flooding Assessment shows that displacement effects associated with the proposed development will be of no consequence, a conclusion which has been supported by an independent review by AWA. Ultimately, the extent of the floodplain is such that the filling of the site would not result in a discernible difference to flood levels across the wider floodplain, or within neighbouring sites. The proposed earthworks design will therefore have less than minor impacts on peak flood depths, both within the site and within the surrounding area for both a 1:20 year and 1:100 year rainfall event. Based on the information provided, there are no wider notable changes to flood depth, maximum flood level, or the direction or velocity of flood flows that would affect the flood risk experienced by any other property or person.

[5] All flood level data supplied by GWRC and AWA was provided using Wellington 1953 datum. It is understood that KCDC has since transitioned to the vertical datum national height standard NZVD2016. Survey and engineering plans showing converted levels will be provided at the subsequent engineering and as-built stage of works, to ensure consistency with the shift to NZVD2016.

The application is accompanied by a Geotechnical Assessment at **Appendix I,** which identifies the site as being at risk of earthquake induced liquefaction. This can be mitigated by the proposed foundation design and the related earthworks and is therefore a low risk with safety being maintained for the proposed buildings and future occupants. The site does not have any slope stability risk.

Turning to potential coastal hazard, such as tsunami, the application site is located within GWRC's Coastal Hazard Area – Tsunami "yellow" area (GWRC Tsunami Hazard Lookup), shown in Figure 5. The GWRC website includes the following advice:

> *Instructions: The Yellow Zone is the self-evacuation zone which means if you feel a long or strong earthquake, then get yourself out.*

In terms of safe evacuation routes, best practice recommends that safe evacuation can be made within 30mins from time of fault rupture to tsunami inundation, noting that people tend to evacuate on foot at a rate of 3km/hr. As shown in Figure 5, a suitable self-evacuation route from the site is within a 10 minute (650m) walk to Trig Hill Terrace, Waikanae Beach, which is out of the tsunami hazard zones. When the distance to safe ground is within 1-2km, evacuees are encouraged to walk to avoid contributing to road congestion that would hinder people who need to drive because of their greater distance to safe areas.

Figure 5: Tsunami Hazard at Application Site and Self-Evacuation Route. Source: GWRC and Google Maps

Overall, effects relating to natural hazards will be appropriately managed, such that they are less than minor.

As such it is considered that the risk from natural hazard both within the site and on adjacent properties will be less than minor.

5.8 Transport Effects

The proposal complies with the requirements of the District Plan except for standards relating to high vehicle movements, reverse manoeuvring from Townhouse 5 onto the road, and provision of visitor cycle parks.

A Traffic Impact Assessment is provided in **Appendix G**. This report concludes that the proposal can be safely and efficiently accommodated within the local road network. I concur with the findings of this assessment and consider associated transport effects to be less than minor for all persons.

The assessment below outlines the key findings of the Transport Assessment.

Parking

The proposal includes 16 onsite parks, with most of the carparks being located in the shared Access Lot 18 and reserved for the exclusive use of the owners/occupiers. Units 1-5 each have onsite parking provided within a

single garage. Should all future residents own a vehicle, this will result in a regular overflow of 1 vehicle parking on street, plus any vehicles associated with visitors. It is noted that kerbside parking is likely to increase, with the rationalisation of kerbside crossings across the wider Eruini Street frontage. The traffic assessment concludes that there is adequate parking capacity within the local street network to accommodate occasional overspill that may eventuate from a development of this scale.

In order to comply with the District Plan, two accessible parking spaces are also proposed as well as space for vehicles to turn around and exit the site in a forward's manner. The on-site car parking has been designed in accordance with the industry standard AS/NZS 2890.1 in terms of parking stall dimensions, with 90-degree parks marked at a minimum 2.7m wide and 5.5m deep, with at least a 5.5m manoeuvre aisle.

Accordingly, the onsite parking, and on-street parking will operate safely and effectively, and any resulting effects will be less than minor.

Access

The development of the site will result in the removal of three redundant vehicle crossings and the formation of two new crossings. Townhouse 5 will be provided with vehicle access directly to/from Eruini Street while all other vehicle movements will be to/from a double width vehicle crossing near the south-eastern end of the site. Compliant visibility splays are proposed where these accesses cross the footpath.

A new sealed internal accessway will provide access to the wider development, with a generous carriageway width accommodating two-way traffic flow. The accessway includes adequate space to operate efficiently and safely, and it is noted that the design incorporates a dedicated pedestrian pathway to service Units 6-17, which is located between Units 4 and 5, providing direct pedestrian access to Eruini Street for the rear units.

The plans in the Traffic Assessment show provision for onsite vehicle turning within the shared access that will provide for vehicles to conveniently turn around and exit in a forward facing manner. Except for Unit 5, all vehicles will therefore exit the site in a forward-facing manner. The assessment at section 7.3 of the Transport report concludes that effects resulting from vehicles reversing from Unit 5 onto Eruini Street will be of no consequence.

Sightlines and gradients through the site are considered to provide for safe and efficient functioning. To ensure sightlines are maintained in perpetuity, a condition requiring a consent notice detailing any limitations on planting to preserve sightlines is proffered.

Waste and recycling collections are anticipated to be undertaken by a private contractor. Bin storage will be located along the eastern side of primary vehicle accessway with rubbish trucks to reverse into the site from Eruini Street for loading. Necessary checks have been completed to ensure a rubbish truck is able to sit idle for loading on the driveway while ensuring access along the driveway is not impeded in any way. Feedback from private waste collection services has confirmed that the proposed collection arrangement (including reversing into the site) is suitable and serviceable.

Ultimately, the proposed access is fit-for-purpose and will operate in a functional and safe manner. Effects will be less than minor.

Wider effects

The traffic generated by the residential proposal will exceed the permitted threshold of 100 vehicles per day. In this case, the increased traffic is anticipated to be approximately 14 trips in the peak hour and 116 trips per day[6]. This amount of traffic generation is not expected to be noticeable to the existing road users. Eruini Street is identified as an access road under the ONRC. Access roads can be expected to carry up to 1,000 vehicles per day in an urban environment with the expected number of vehicle trips resulting in excess traffic capacity of around 40%. The addition of vehicle movements in the peak hour will have little to no impact on the local transport network with the local roads and nearby intersections expected to be able to accommodate this level of traffic generation while continuing to operate safely.

The Transport Assessment has considered the wider network effects of the proposal, and the analysis demonstrates that traffic generated by the proposal can be appropriately accommodated on the network without causing adverse capacity or safety issues.

Overall, the Transport Assessment concludes that there are no evident adverse road safety concerns pertaining to the proposal that are expected to effect, or be affected by, the proposed additional traffic. For these reasons, it is considered that any impacts of the proposed development resulting from increased traffic generation are acceptable.

Sustainable Transport Effects

The site is well serviced by pedestrian footpaths on both sides of Eruini Street, and the local road network can accommodate additional cyclists associated with increased occupation levels at the development site. The proposal includes several onsite bicycle parks for the residents (exceeding District Plan minimums). While a dedicated visitor bike park is not provided, it is anticipated any visitors arriving to the site by bicycle will place their bike adjacent to the resident's dwelling being visited, as is typical. The effects of the visitor bike parking noncompliance will be negligible.

Outside of active sustainable transport options, the site is well located in terms of an available and frequent public transport service. If anything, the proposal may generate a small increase in demand, which is determined to be a positive feature as this is what typically drives service improvements. Regardless, the existing public transport network has capacity to accommodate any resulting demand.

Overall, informed by the assessment and findings within the Traffic Impact Assessment at Appendix G, related adverse transport effects are considered less than minor and acceptable.

5.9 Subdivision Effects

It is proposed to undertake a fee simple subdivision with land use consent being sought concurrently for the proposed units. The proposed subdivision will establish 17 freehold residential allotments on site. Each allotment is of sufficient size and shape to support the intended residential dwelling, as well as outdoor living areas, planting, and onsite parking (noting in the cases of Units 7-17, these carparks are located in the shared Access Lot 18 and reserved for the exclusive use of the owners/occupiers).

The proposed subdivision reflects the proposed layout of dwellings, driveway, and communal space as per the land use consent.

[6] The Traffic Impact Assessment refers to 136 daily vehicle movements. This is based on a 20 unit development. With 17 units, this calculation is appropriately altered to 116 vehicle movements (i.e. 6.8vpd x 17 = 116vpd). Similarly, the trips per hour has been altered to reflect the 17 unit proposal.

As a result of the fee simple subdivision there will be a breach to building coverage and permeable surface requirements. Irrespective of this, the design and layout of the proposed allotments are of a suitable size and shape to accommodate the proposed units, the outdoor living areas, access, and the proposed landscaping. Notably, if an alternative subdivision tenure was sought (i.e. unit title, rather than fee simple), there would be no resulting technical breaches to these standards. While the act of subdivision will result in non-compliance with the building coverage standard, it will not create or exacerbate any adverse environmental effects for any person. While the allotments are smaller than prevail in the wider area, there is no minimum lot size required, as land use consent is sought concurrently for the development. The subdivision will not create or exacerbate any character or streetscape effects relative to those generated by the concurrent land use and will be less than minor.

Each allotment will be provided with legal and physical access to Eruini Street and the surrounding public road network. The effects of the transport non-compliances have been assessed under '*Transport'* above. No related effects will be created or compounded by the act of subdivision.

There are no known regionally significant network utilities located on or in proximity to the site. While the site is impacted by Flooding – Ponding, the proposal will not exacerbate resulting effects either within the site, or beyond. No significant natural hazards have been identified in relation to the site, and as such the proposed subdivision will not exacerbate or give rise to these effects more broadly.

Services connections for the three waters network, power and telecommunications will be installed for each dwelling/allotment. These will be designed to comply with the relevant District Plan standards, and stormwater attenuation and water re-use will take place on site to minimise the effects of the development on the public networks. On this basis, any adverse servicing and engineering effects are considered to be less than minor.

Overall, the proposed design and layout of the allotments can accommodate the necessary services as indicated on the subdivision scheme plan, attached at **Appendix C**, and each allotment will have suitable physical and legal access.

Effects associated with the subdivision design and layout will be less than minor and acceptable.

5.10 Servicing Effects

The site can be serviced appropriately for stormwater, sewer, water, power and telecommunications as demonstrated in the attached scheme plan (**Appendix C**), and discussed in the attached Infrastructure Report by Envelope Engineering (**Appendix H**). It is expected that appropriate conditions will be imposed on the consent which will require the applicant to install and/or maintain services to the standards of the Council. Where necessary easements are proposed to allow for servicing of the proposed allotments.

Wastewater modelling undertaken by HAL, on behalf of Kāpiti Coast District Council confirms that wastewater mitigation is not required.

With regard to stormwater control and management, all operational discharges of stormwater are managed via water sensitive design. The existing hydrology post-development will remain largely unchanged as the site's primary stormwater disposal relies on good ground soakage (see Soakage Test Report **Appendix H**). All new run-off from the development will be collected and discharged via the proposed soak pit, thereby achieving hydraulic neutrality. The proposed stormwater management devices will be designed in accordance with Part 3, Section E of the Kāpiti Coast District Council's Land Development Minimum Requirements. The Water Sensitive Urban Design (WSUD) measures employed on the site are outlined below - these measures are appropriate and achieve a suitable WSUD outcome for the site.

WSUD Items	Design Response
Limit impervious area	Where possible, the proposal has included areas of permeable surfaces and planted areas.
Restricting zinc or copper roofing materials	Materials which have the potential to leach contaminants are not being used in this development. A condition would be accepted that imposes a consent notice stating that these materials will not be used as roofing materials without treatment of this runoff.
Collect water for domestic or garden uses	Rainwater re-use is proposed for this development for outdoor use.
Retention	Rainwater storage will achieve retention of stormwater, particularly for high frequency events. Retention provides mitigation against hydrological effects in high frequency rainfall events and protects the receiving catchment from increase in scouring and other negative effects. The proposed stormwater system will mitigate peak stormwater flows from the site to pre-development levels across a wide range of events up to the 1% AEP event. The stormwater will infiltrate into the ground via onsite soakpits.
Attenuation	Mitigation measures have been designed and implemented in accordance with the Council's LDMR within the civil design and model. These consist of underground attenuation tanks (e.g. Cirtex Rain Smart) with a total of 225 and 342 crates to attenuate peak flow for the 10 and 100-year events of the fully developed site, respectfully.

The District Plan does not identify on site waste management as a resource management issue. Instead, this issue is addressed under the Council's Solid Waste Management and Minimisation Bylaw 2021. The bylaw provides a means to mitigate potential adverse waste management effects including access, and minimising noise and odour and vermin. Any obligations upon the Residents Association under this bylaw will be addressed and dealt with separately from the resource consent. Notwithstanding, there is adequate space for safe and efficient collection within the site and at the kerbside, as is commonly undertaken throughout the district. A waste management plan will be prepared for submission to Council (post lodgement) in line with the Solid Waste Management and Minimisation bylaw. Effects in relation to waste management will be less than minor on the environment, and no parties will be adversely affected.

Overall, the density of development proposed is aligned with the general development expectations for this established residential area and therefore any actual or potential adverse effects on existing infrastructure can be considered to be less than minor and acceptable.

5.11 Construction Effects

Any potential adverse effects from the construction of the proposed dwellings and associated site development works will be temporary in nature.

The earthworks and civil construction works on site are anticipated to occur across a period of approximately 6 months. Construction works are likely to take place 5 days a week (7.30am to 6pm) and Saturdays (8am to 4pm). No work are anticipated to be carried out on Sundays or public holidays. Exceptions to the above mentioned hours may be required for emergency remedial works, or in relation to general safety issues on the site.

Construction noise will remain in compliance with NZS6903:1999 Acoustics – Construction Noise and Section 16 of the RMA. A small amount of vibration, associated with earthworks and construction, may be discernible beyond the site boundary. Vibratory rollers may be required to compact fill; this is a common procedure within the region, and the relatively short time frame associated with this method should ensure that potential effects at neighbouring sites remain less than minor. More specifically, based on standard construction methodology and BPO, the construction is anticipated to be compliant with the most stringent standard (BS5228) at a setback

distance of 3m or more for vibration amenity, and at 1m or more for cosmetic building damage (residential). If determined necessary by Council to mitigate effects, these matters can be appropriately and fully addressed in a Construction Management Plan.

Dust can become a problem during construction activities and in certain weather conditions, causing disturbance to neighbouring properties. Dust may be generated from both works on site and haulage of materials. The following measures could be used to minimise effects of excessive dust on adjoining properties:

- A water cart with sufficient water resources must be available on short notice for the duration of the works.
- All storage areas, loading and unloading operations and other activities carried out on site shall be conducted and managed in such a manner as to ensure that all dust and particulate emissions are kept to a practical minimum.
- Where the existing landform or vegetative cover is being disturbed, ground cover is to be established immediately following earthworks and with a minimum of delay to ensure the wind erosion of soil or other material does not become a nuisance.

In terms of construction related traffic, at this stage it is difficult to provide accurate details of construction traffic at this early concept stage. However, the application site is of a size that is anticipated to suitably accommodate construction related vehicles and the need to park vehicles on the road will be limited. Consistent with standard practice, a condition of consent is offered that requires a construction management plan (CMP) to be submitted to council at the Engineering Approval Stage that considers all site vehicle movements and how the site will interact with the road environment through the construction phase.

Any adverse effects associated with the earthworks, construction of the proposed dwellings, access and onsite servicing will be temporary in nature and are considered a necessary part of any new residential development of this scale.

With the implementation of the proposed mitigation, and considering the temporary nature of construction, any adverse effects will be less than minor.

5.12 Cultural Effects

The application site is not identified as being of significant cultural importance within the District Plan. Notwithstanding, it is noted that the site is in proximity, but well outside of, the identified Kārewarewa Urupā Block, which is located further to the southwest. The Kārewarewa Urupā Block is currently separately going through a planning process under Plan Change 3 to the Kāpiti Coast District Council District Plan. The application site forms part of a well established residential environment, that was subdivided and developed in the 1960s.

In recognition of the site's coastal location, and general proximity to Kārewarewa Urupā Block (which is understood to be the location of a 19th Century battle site), the applicant offers an accidental discovery protocol condition. This will ensure appropriate cultural measures and protocols are in place and followed if artefacts or kōiwi are discovered through the course of site works.

For completeness, Te Āti Awa ki Whakarongotai have been consulted (via email – refer to **Appendix J**) prior to lodgement of this resource consent application. No specific concerns were expressed regarding the project. With regard to landscaping, the applicant intends to eco-source native plants locally.

To minimise any adverse effects to land or water beyond the site, water sensitive design has been integrated into the site design and erosion/sediment control measures will be in place during construction.

While there are no known archaeological resources on the site, an Accidental Discovery Protocol condition is appropriate given the extent of earthworks proposed on the site.

For the reasons above, any potential for cultural effects are considered less than minor and acceptable.

5.13 Conclusion

Overall, it is considered that with the implementation of the measures proposed in this application (including the appendices) the actual and potential adverse environmental effects of the proposal will be avoided, mitigated or remedied so as to be less than minor and acceptable.

6. Statutory Assessment

The following assessment is provided in accordance with the relevant sections of the Resource Management Act 1991 (RMA).

6.1 Part 2 (Purposes and Principles) – Sections 5, 6, 7 and 8

Consideration of an application is 'subject to Part 2' (sections 5, 6, 7 and 8) of the Act. Part 2 sets out the purpose and principles of the Act. The caselaw direction in R J Davidson Family Trust v Marlborough District Council [2018] NZCA 316 is that the statutory language in section 104 plainly contemplates direct consideration of Part 2 matters, when it is appropriate to do so. Further, the Court considered that where a plan has been competently prepared under the RMA it may be that in many cases there will be no need to refer to Part 2 because it would not add anything to the evaluative exercise. However, if there is doubt that a plan has been "competently prepared" under the RMA, then it will be appropriate and necessary to have regard to Part 2.

In this case, the relevant planning framework has been competently (and recently) prepared, and there is no further need to refer to Part 2.

6.2 Section 104(1)

This section of the RMA requires that, when considering an application for resource consent, the consent authority must have regard to a number of factors, as considered follows:

- Section 104(a) of the Act – Potential or Actual Effects;
- National Environmental Standards;
- Other Regulations;
- National Policy Statements;
- Objectives and Policies of the Regional Policy Statement;
- Objectives and Policies of the Operative District Plan; and
- Other Matters.

6.2.1 Section 104(1)(a) – AEE

This section of the RMA requires that regard is given to any actual and potential effects on the environment of allowing the activity.

An assessment of the actual and potential effects of the proposal is included in **Section 5** of this report. It is considered that the adverse effects on the environment will be less than minor and acceptable.

6.2.2 Section 104(1)(b)(i) – NES's

Section 104(1)(b)(i) of the RMA requires that regard is given to any relevant provisions of a national environmental standard.

There are no national environmental standards relevant to this proposal.

6.2.3 Section 104(1)(b)(ii) – Other Regulations

Under section 104(1)(b)(ii), consideration must be given to any other relevant regulations. No other regulations are relevant to this proposal.

6.2.4 Section 104(1)(b)(iii) and (iv) – National Policy Statements

Under section 104(1)(b)(iii) and (iv), consideration must be given to any relevant provisions of a National Policy Statement (NPS).

The following National Policy Statements are of specific relevance to this proposal.

National Policy Statement on Urban Development

The NPS-UD is considered to the of most relevance to this proposal. The NPS-UD, which seeks to create well-functioning urban environments through the RMA planning process, has been recently integrated into the District Plan through the recent District Plan review process. The proposal is consistent with the relevant objectives and policies of the NPS-UD.

New Zealand Coastal Policy Statement

The NZCPS is also considered of some relevance, noting the site is within the landward extent of the coastal environment. However, given the application site is located within an urbanised area and has previously been modified and contains an existing residential use, the relevance of this higher order planning document is somewhat reduced. Moreover, the outcomes directed by the NZCPS have also been incorporated within the recently reviewed District Plan and the proposal is considered to be consistent with the underlying direction of this plan.

6.2.5 Section 104(1)(b)(v) – Regional Policy Statement

Section 104(1)(b)(v) of the RMA requires that regard is given to any relevant provisions of a Regional Policy Statement (RPS) or proposed RPS. The proposal is broadly consistent with the objectives and policies of the operative RPS and Proposed Change 1 as it will:

- Manage the effects of earthworks and vegetation clearance on freshwater values.
- Supports a consolidated regional form, design and function with a development that is appropriate to the residential character of the area.
- Will not result in any significant modifications to the natural landforms.
- Will not impact on air quality, fresh water, historic heritage, indigenous ecosystems or soils and minerals.
- Will not increase risk to people from natural hazards.
- Not impact on climate resilience.

6.2.6 Section 104(1)(b)(vi) – Plans or Proposed Plans

Under section 104(1)(b)(vi), regard must be given to any relevant provisions of a plan or proposed plan.

The following sections provide an assessment of the proposal against the relevant objectives and policies in the Operative District Plan. The assessment should be read in conjunction with the assessment of effects in **Section 5** above.

The proposal is consistent with the following Strategic Objectives and Policies:

- DO-O1 – Tangata Whenua
- DO-O3 – Development Management
- DO-O4 – Coastal Environment
- DO-O5 – Natural Hazards

- DO-O8 – Strong Communities
- DO-O11 – Character and Amenity Values
- DO-O12 – Housing Choice and Affordability
- DO-O13 – Infrastructure
- DO-O14 – Access and Transport
- DO-O20 – Well-functioning Urban Environments
- DO-O21 – Housing in Relevant Residential Environments
- UFD-P2 – Housing Choice
- UFD-P3 – Managing Intensification
- UFD-P4 – Residential Density

Assessment against the specific district wide provisions that are relevant to this proposal is provided below.

Table 2: Relevant Objectives and Policies of the Operative District Plan

GENERAL RESIDENTIAL ZONE	
GRZ-P20 MRDS Policy 1	*Enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments.*
GRZ-P21 MRDS Policy 2	*Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).*
GRZ-P22 MRDS Policy 3	*Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.*
GRZ-P23 MRDS Policy 4	*Enable housing to be designed to meet the day-to-day needs of residents.*
GRZ-P24 MRDS Policy 5	*Provide for developments not meeting permitted activity status, while encouraging high-quality developments*
GRZ-P7 Development and Landforms	*Subdivision, use and development (including associated driveways) should be sited, designed and undertaken to integrate with the natural topography and landform of the land and to minimise:* ***1.*** *the visual impact, bulk and scale of buildings and structures on identified landscape values, ecological sites, geological features or areas of high natural character;* ***2.*** *the extent of cut and fill;* ***3.*** *the need for and the height of retaining walls; and* *4. the mass of buildings on sloping land, by variations in wall and roof lines and by floor plans which complement the contours of the land.*
GRZ-P9 Residential Activities	*Residential activities will be recognised and provided for as the principal use in the Residential Zones, while ensuring that the effects of subdivision, use and development is in accordance with the following principles:* *1. adverse effects on natural systems will be avoided, remedied or mitigated;* *2. new built development will respond to the planned built character of the Zone;* *3. transport choice, efficiency and accessibility to active or public transport will be maximised;* *4. housing types which meet the need of households will be provided for;* *5. The functional and operational requirements of different types of housing are recognised; and* *6. Accessory buildings and buildings which are ancillary to residential activities will be provided for.*
GRZ-P10 Residential Amenity	*Subdivision, use and development in the Residential Zones will be required to achieve on-site amenity for residents and neighbours in accordance with the following principles:* *1. building size and footprint will be proportional to the size of the allotment;* *2. usable and easily accessible private outdoor living spaces will be provided;* *3. buildings and structures will be designed and located to maximise sunlight access, privacy and amenity for the site and adjoining allotments;* *4. buildings and structures will be designed and located to respond to the planned built character of the Zone;* *5. appropriate separation distances will be maintained between buildings;* *6. yards will be provided to achieve appropriate building setbacks from neighbouring areas, the street and the coast;* *7. hard and impermeable surfaces will be offset by permeable areas on individual allotments;* *8. unreasonable and excessive noise, odour, smoke, dust, light, glare and vibration will be avoided;* *9. non-residential buildings will be of a form and scale which is compatible with the surrounding residential environment; and* *10. service areas for non-residential activities will be screened, and planting and landscaping will be provided.*

GRZ-P11 Residential Streetscape	*Development, use and subdivision will enhance the amenity, functionality and safety of the streetscape in the Residential Zones. To achieve a positive relationship between development and the street, development will be undertaken in accordance with the Council's Streetscape Strategy and Guideline:* *1. direct pedestrian access will be provided from the street to the front entrance of the primary residential building, where practicable;* *2. where practicable, at least one habitable room will be orientated towards the street;* *3. the safety of road users, including pedestrians and cyclists, will not be adversely affected; and* *4. on-site vehicle manoeuvring will be provided for rear allotments, allotments with significant sloping driveways and on strategic arterial routes.*
GRZ-P12 Landscaping	*Landscaping will be required for non-residential activities and residential development in the Residential Zones to enhance residential amenity, while promoting water conservation and biodiversity and allowing for the natural infiltration of surface waters through permeable treatments.* Landscaping *will be located and designed in accordance with the following principles:* *1. the visual impact of large buildings will be reduced by appropriate screening and planting;* *2. service areas, loading areas and outdoor storage areas will be screened;* *3. on-site outdoor living spaces will be defined and enhanced by landscaping;* *4. sunlight access and passive surveillance to adjoining areas will not be unreasonably restricted;* *5. public infrastructure and services will not be damaged or blocked;* *6. planting of locally indigenous vegetation will be encouraged; and* *7. permeable surfaces will be provided for the natural infiltration of surface waters.*
GRZ-P13 Energy Efficiency	*Where practicable, development and subdivision in the Residential Zones will be designed to minimise energy consumption by maximising sunlight access, and incorporating passive ventilation. Specifically, development will be undertaken in accordance with the following principles:* *1. good sunlight access should be prioritised to main living areas, habitable rooms (including rooms used for hospital recovery) and the private open space associated with living areas; and* *2. the potential for natural cross-ventilation will be maximised to enable cooling breezes to reduce internal temperatures in the summer months*

Assessment

The proposal will result in a change in character and amenity values to those currently experienced, however the development is consistent with the planned urban environment of the General Residential Zone.

The design responds to the qualities of the area and will contribute positively to the character and amenity of the neighbourhood.

The proposal provides for a variety of housing typologies to those currently available in the broader Kāpiti housing market.

The allotments are of a shape and size that can achieve functionality for the residential dwellings designed within them.

The street facing units provide good natural surveillance to the street with good levels of glazing and opportunity for passive surveillance. The development site incorporates quality landscaping at the site frontage, providing an attractive interface with the public street.

Landscaping is proposed to ingratiate the development into the residential environment in which it is located and enhance the visual appearance of the development.

As a result of the subdivision, there will be breaches to the building coverage standard and permeable surface rule. These are technical non-compliances as a result of the subdivision, for which land use consent is sought concurrently. The proposal represents a high-quality development that provides for residential amenity values that are consistent with achieving a medium density built outcome. The units have been designed to ensure high levels of on-site amenity is provided by orientating the units and outdoor living areas for optimum sunlight and outlook.

The site is generally flat in topography with minimal changes to ground level required. The development will integrate into the natural topography and landforms. Construction and earthworks will result in a temporary effect on residential

amenity. However, these effects are necessary to facilitate the development. There will be no exposed earth on completion of the earthworks.

An urban design assessment and landscape plan have been provided to ensure a high level of on site and off site amenity and site functionality are achieved. These matters are considered further in Section 5, where any adverse effects are considered less than minor.

The proposed development is considered to meet the outcomes of Policy GRZ-P10. The proposal takes measures to ensure privacy and amenity are maintained both within the site and to neighbouring properties. The development is considered to provide a medium density form of living that will be well integrated into the neighbourhood with familiar building materials, a modest form and frontage that relates well with the street.

A traffic report has been appended, which considers the vehicle accessways, site manoeuvring and safety of road users to be appropriate. Passive surveillance has been considered through the urban design assessment and has been provided. Direct pedestrian access will be provided from the street to the front entrance of each residential unit that has a street frontage. The proposal is consistent with GRZ-P11.

A comprehensive Landscape Plan has been prepared and appended to this report which takes into account all of the matters in GRZ-P12.

An Urban Design Assessment is provided at Appendix E. This addresses sunlight and ventilation, both of which are considered appropriate for the following reasons:

- Each unit will maximise opportunities for sun from either the east and west, or north.
- A high degree of glazing has been proposed on the façades that are oriented towards the sun with glass sliding doors and generous windows reducing the need for heating and saving on energy costs.
- All dwellings will have windows that can open to ventilate naturally.

SUBDIVISION	
No specific objectives or policies. Refer to Strategic Objectives, district wide, and zone-based provisions instead.	
INFRASTRUCTURE	
INF-MENU-P17 **Hydraulic Neutrality Stormwater**	*Subdivision and development will be designed to ensure that the stormwater runoff from all new impermeable surfaces will be disposed of or stored on-site and released at a rate that does not exceed the peak stormwater runoff when compared to the pre-development situation.*
INF-MENU-P18 Stormwater Quantity and Quality	*The adverse effects of stormwater runoff from subdivision and development, in particular cumulative effects, will be minimised. The following assessment criteria will be applied when considering resource consent applications for* subdivision *and* development*:* 1. *whether there is capacity in Council's existing infrastructure;* 2. *the extent to which the capacity and environmental values of watercourses or drains and the associated catchment areas will be compromised;* 3. *the extent to which development styles and stormwater management methods mimic natural, pre-development runoff patterns;* 4. *the extent to which riparian vegetation is protected and enhanced;* 5. *whether minimal vegetation loss in riparian areas associated with development is achieved;* 6. *the extent to which water quality is ensured to enhance and maintain aquatic ecosystem health;* 7. *the extent to which a healthy aquatic system is maintained, including maintenance of sufficient flows and avoidance of unnatural fluctuations in flows;* 8. *the extent to which degraded, piped or channeled streams are restored and realigned into a more natural pattern;*

	9. *where practicable, the extent to which low impact design, including on-site disposal of stormwater, soft engineering or bioengineering solutions and swales within the legal road are used;* 10. *the extent to which straightening and piping of streams is avoided; and* 11. *the extent to which the adverse effects of stormwater runoff, in particular cumulative effects, from subdivision and development will be minimized.*
INF-MENU-P19 Water Demand Management	*New residential development connected to the public potable water supply and reticulation network will be required to provide rainwater storage tanks, water re-use systems or other water demand management systems to supply water for toilets and all outdoor non-potable uses.*
INF-MENU-P20 Water Supply	*All new subdivision, land use or development will have an adequate supply of water in terms of volume and quality for the anticipated end uses, including firefighting supply. Where a new connection to the reticulated network is proposed, evidence may be required to support its viability.*
INF-MENU-P21 Wastewater	*Subdivision, land use and development will ensure that the treatment and disposal of wastewater will be adequate for the anticipated end uses appropriate to the location. The treatment and disposal of wastewater will be undertaken in a manner that avoids, remedies or mitigates adverse effects on the environment and maintains public health and safety. Where a new connection to the reticulated network is proposed, evidence may be required to support its viability.*
Assessment	
The stormwater design is based on achieving hydraulic neutrality for the site to ensure the proposed development does not increase potential peak stormwater flows beyond what the site currently generates. The design proposes a comprehensive stormwater solution for the overall site redevelopment. The proposed onsite stormwater management and servicing design incorporates WSUD measures (to limit run-off, mimic natural hydrological processes, and limit the amount of contaminant laden stormwater that is discharged from the site). Measures have been incorporated into the design of the development to reduce water demand, with the proposal incorporating onsite water demand management for outdoor and non-potable uses. The proposal provides for adequate three waters, power and telecommunications servicing to the resulting allotments/residential units in line with the requirements of the LDMR. The proposed development can be serviced by reticulated networks without creating capacity or efficiency issues, as demonstrated in the reports appended to this application document. The proposal is therefore considered to be consistent with these provisions.	
TRANSPORT	
TR-P1 Integrated Transport and Urban Form	*Development and subdivision will be integrated with and consistent with the transport network hierarchy in TR-Table 7 , and undertaken in a manner and at a rate to ensure:* **1.** *the transport network is capable of serving the projected demand safely and efficiently;* 2. *the location of development is appropriate, including providing for the co-location of compatible developments and land use and transport networks to reduce unnecessary travel;* 3. *travel time and distance to services are minimised for all modes of travel;* 4. *development is consistent with Council's Land Development Minimum Requirements; and* **5.** *enhanced community connectivity is achieved, resulting in more efficient travel patterns from the community.*
TR-P2 Sustainable Transport and	*Development and subdivision will be integrated with a transport system that offers a wide range of travel mode choices, which connects residents to essential community services, centres and social infrastructure, through:* 1. *well-integrated and connected communities;*

Maximising Mode Choice	*2. development that is conducive to active modes of travel, particularly walkable communities which reduce demand for vehicular travel, particularly by private vehicle;* *3. land use that is integrated with the transport network;* *4. improved public transport services to the District;* *5. travel plans and transport assessments for major traffic activities as part of an application for consent for new developments;* *6. consistency with the Council's Subdivision and Development Principles and Requirements 2012; and* *7. development that ensures adequate access and space for all modes, including pedestrians, people with mobility problems, cyclists, public transport and private car travel.*
TR-P5 Effects of Land Use on Transport	*The potential adverse effects on the transport network from development and subdivision will be avoided, remedied or mitigated by identifying both the key existing transport routes and proposed transport routes likely to be required long term as part of the District's transport network and having regard to these when considering applications for subdivision or development.*
TR-P6 Safety	*The safety of all transport users will be enhanced during the development, operation, maintenance and upgrading of the transport network, by:* *1. implementing the principles set out in Appendix 6 - Crime Prevention Through Environmental Design (CPTED) Guidelines;* *2. requiring that all developments provide for safe vehicular and pedestrian access, and have adequate visibility (sight lines);* *3. requiring all developments to have safe connections to the wider transport network; and* *4. requiring adequate visibility and sight lines for level crossings.*
TR-PARK-P8 Parking	*All new subdivision and development shall provide for safe vehicular and pedestrian access and appropriate accessible carparks by:* ***1.*** *providing accessible carpark numbers, layouts and dimensions consistent with parking standards;* *2. supplying adequate off street accessible carparks to meet the demand of the land use while having regard to the following factors:* *a. the intensity, duration location and management of the activity.* *b. the adequacy of accessible carparks in the location and adjacent areas.* *c. the classification and use of the road (as per transport network hierarchy in TR-Table 7), and the speed restrictions that apply.* *d. the nature of the subject site, in particular its capacity to accommodate accessible carparks.* *e. the characteristics of the previous activity undertaken on the subject site;* *3. taking effects on neighbouring areas into account when designing the location, layout and number of cycle parks and accessible carparks;* *4. ensuring the location, layout and number of cycle parks and accessible carparks is safe, user-friendly and appropriate.*
TR-PARK-P8A Cycle Parking	*Subdivision and development shall provide for safe, sufficient, and appropriately located onsite cycle parking facilities.*

Assessment

The proposal will result in the development of land that is in proximity to employment and service centres and public transport connections. There is space for bicycles to be stored within the site, which further enables and encourages sustainable transport options and alternative mode choice.

The proposal will result in a safe, efficient and effective functioning of the onsite vehicle access, including the safety of pedestrians and provision for firefighting and waste collection services. Ultimately, the proposed access is fit-for-purpose, and will operate in a functional and safe manner.

The onsite parking will be adequate for demand, and on-street parking capacity is available for any occasional overspill. The proposal includes two accessible carparks, consistent with the minimum requirements of the District Plan.

The analysis within the Transport Assessment demonstrates that traffic generated by the proposal can be appropriately accommodated on the network without causing adverse capacity issues.

The proposal will continue to result in the safe, resilient, efficient and effective functioning of the transport network.

Specific provision has not been made for a visitor bicycle rack, but the proposal incorporates multiple bicycle storage areas (in excess of the 2 required within the District Plan). More generally, there is ample space within each site to accommodate a visitor on a bicycle.

The proposal is consistent with these provisions.

NATURAL HAZARDS	
NH-P2 Risk Based Approach	*A risk based, all hazards approach will be taken to subdivision, land use, and development within areas subject to the following natural hazards:* *a. flood hazards;* *b. earthquake hazards; and* *c. fire hazards.* *Hazard categories will be developed for flood and seismic hazards to guide decision making and help minimise potential harm to people and damage to property due to these hazards, while allowing appropriate use.*
NH-P3 Managing Activities in Natural Hazard Prone Areas	*In areas identified on the District Plan Maps, new subdivision, use and development will be managed in a way that avoids increasing risks from natural hazards. Subdivision, use and development will be allowed only where it can be shown that any potential increase in risk exposure on or beyond the land itself has been avoided, remedied or mitigated.*
NH-FLOOD-P10 Flood and Erosion Free Building Areas	*All new lots must have flood and erosion-free building areas based on 1% AEP flood modelling.*
NH-FLOOD-P13 Ponding, Residual Ponding, Shallow Surface Flow, Flood Storage and Fill Control Areas	*When assessing applications for subdivision, use or development within a ponding, residual ponding, shallow surface flow, flood storage or fill control area, consider the following:* *1. the effects of the development on existing flood mitigation structures;* *2. the effects of the development on the flood hazard – in particular flood levels and flow;* *3. whether the development redirects floodwater onto adjoining sites or other parts of the floodplain;* *4. whether access to the subject site will adversely affect the flood hazard;* *5. the extent to which buildings (excluding minor buildings) can be located on areas of the site not subject to flooding; and* 6. *whether any subdivision or development will or may result in damage to property or harm to people.*

Assessment

The risk from natural hazards has been assessed as part of the proposal, including measures proposed to manage the potential flood risk and stormwater flows. This approach is considered to be consistent with the intent of this policy.

All proposed residential units will be designed and constructed so they are free of flood risk based on the 1% AEP flood modelling. Expert flooding assessments also confirm the proposed site works will not result in discernible offsite flooding effects, in either the 1:100 year flooding event, or 1:20 year flooding event.

The Geotechnical Report submitted with the application identifies the site as being at risk of earthquake induced liquefaction. This can be mitigated by foundation design and the proposed earthworks and is therefore a low risk with safety being maintained for the proposed buildings and future occupants. The site does not have any slope stability risk.

The proposed development is not considered to be at significant risk from any other hazards.

The proposal is therefore considered to be consistent with these provisions.	
EARTHWORKS	
EW-P1 – Earthworks	*Earthworks activities excluding extractive industries, the removal and replacement of underground storage tanks, and earthworks defined in and regulated by the NESPF will:* *1. Be managed to protect geological features identified in Schedule 6 from disturbance; and* *2. Be sympathetically located and of a scale that protects the values of outstanding natural features and landscapes identified in Schedule 4; and* *3. Avoid or mitigate erosion and off-site silt and sediment runoff to the Council's reticulated stormwater system and waterbodies; and* *4. Be managed to ensure adverse effects on natural landforms, residential amenity values and rural character values are remedied or mitigated.*
Assessment	
The proposal is considered to be consistent with this policy. The site does not contain any relevant identified geological features. The proposal incorporates a development landscaping plan, to help mitigate effects of earthworks on this landform. The overall landform will remain legible. The site is not in a rural area and the earthworks will be undertaken in a way to avoid or mitigate erosion and sediment runoff. The application proffers a condition for a Construction Management Plan. Early engagement has been undertaken with iwi, with no significant concerns raised. The applicant also offers an accidental discovery protocol, noting the extent of earthworks and wider proximity to the coast. As such, the proposal is consistent with this provision.	
COASTAL ENVIRONMENT	
The site is located within an urbanised area, albeit within the *Coastal Environment*. The site is not within an area with identified Natural Character (in the context of the *Coastal Environment*). There are no relevant provisions within the Coastal Environment chapter of the District Plan applicable to this site and proposal. More generally, it is noted that the urban environment in the Wellington region intersects with the Coastal Environment in many places, including Waikanae Beach. Development in these already urbanised locations is appropriate and consistent with the underlying zoning framework.	

Overall, the proposal is consistent with the outcomes directed within the relevant objectives and policies of the Operative District Plan.

6.2.7 Section 104(1)(c) – Other Matters

Section 104(1)(c) of the RMA requires that regard is given to any other matters the consent authority considers necessary to determine the application. As noted elsewhere, a waste management plan will be prepared for submission to Council (post lodgement) in line with the Council's Solid Waste Management and Minimisation bylaw.

There are no other matters of particular relevance to the consideration of this application.

6.2.8 Section 106

Section 106 of the RMA states that a consent authority may refuse subdivision consent in certain circumstances, or grant a subdivision consent subject to conditions, if it considers that there is a significant risk from natural hazards or if sufficient provision has not been made for legal and physical access to each allotment created by the subdivision.

The risk of liquefaction is appropriately managed and mitigated by the construction of appropriate building foundations through the building design processes under the Building Act. A condition is offered to this effect. Section 5.7 of this report discusses the site's inundation and tsunami hazards and the response through raised floor levels, and self-evacuation in the event of tsunami. The flood risk assessment (**Appendix F**) notes that the proposal will not result in any undue increase in offsite flood risk. Accordingly, any natural hazard effects have been appropriately mitigated and are not considered to present a significant risk to people or property.

Both legal and physical access can be provided to each allotment.

It is considered that the matters raised under section 106 of the RMA have been met and therefore consent can be granted in terms of this section of the Act.

6.2.9 Sections 108 and 220 of the RMA

This application includes a number of proffered conditions to mitigate the potential effects of the proposal and to provide certainty in relation to the proposal. The proffered conditions included in this application are:

- Standard condition(s) of consent on the Land Use decision relating to mitigating construction effects of the earthworks.
- A condition requiring a Construction Management Plan to be submitted to Council prior to works commencing.
- Standard condition(s) of consent on the Land Use decision relating to constructing in accordance with the approved plans and undertaking site landscaping in manner consistent with the plans.
- An accidental discovery protocol condition relating to the earthworks and construction phase of works.
- Standard condition(s) of consent on the Subdivision decision relating to design and installation of services.
- Standard condition(s) of consent on the Subdivision decision relating to registering easements and amalgamation of titles.

We request that draft conditions be circulated to us prior to the release of the resource consent decision.

7. Conclusion

This application has analysed the proposal in terms of the actual and potential effects on the environment with the conclusion that there are no affected persons and the adverse effects will be less than minor and acceptable.

It is considered that the proposal is consistent with the relevant objectives and policies of the Regional Policy Statement, the Operative District Plan as well as Part 2 of the RMA. It is therefore considered that the Council can grant the consent, subject to the imposition of appropriate conditions.

We request that draft conditions be circulated to us prior to the release of the resource consent decision.