

100&110 TE MOANA ROAD – OSBORNE, SITE SUBMISSION



PLAN CHANGE 2 SUBMISSION SEPT 2022 (LANDLINK REF 2584)

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1. Submitter Details

Submitter	Vince/Eric Osborne
Agent (Contact person)	Landlink Paul Turner/Marie Payne
Postal Address	[REDACTED]
Telephone	04 902 6161
Email	paul@landlink.co.nz / marie@landlink.co.nz
I would like my address for service to be my email	Yes
I have selected email as my address for service, and I would also like my postal address withheld from being publicly available [select box if applicable]	Yes

2. Summary

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

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

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

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

3. Submission Scope

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

- The exclusion of 100-110 Te Moana Road from Plan change 2 residential rezoning.


This submission advocates that Plan Change 2 includes 100-110 as a residential site to be rezoned to ensure that effect is given to Policies 1, 2 and 3 of NPS-UD 2020, with particular regard to Part D policy 3.

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

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

SUBMISSION

4. Site Profile

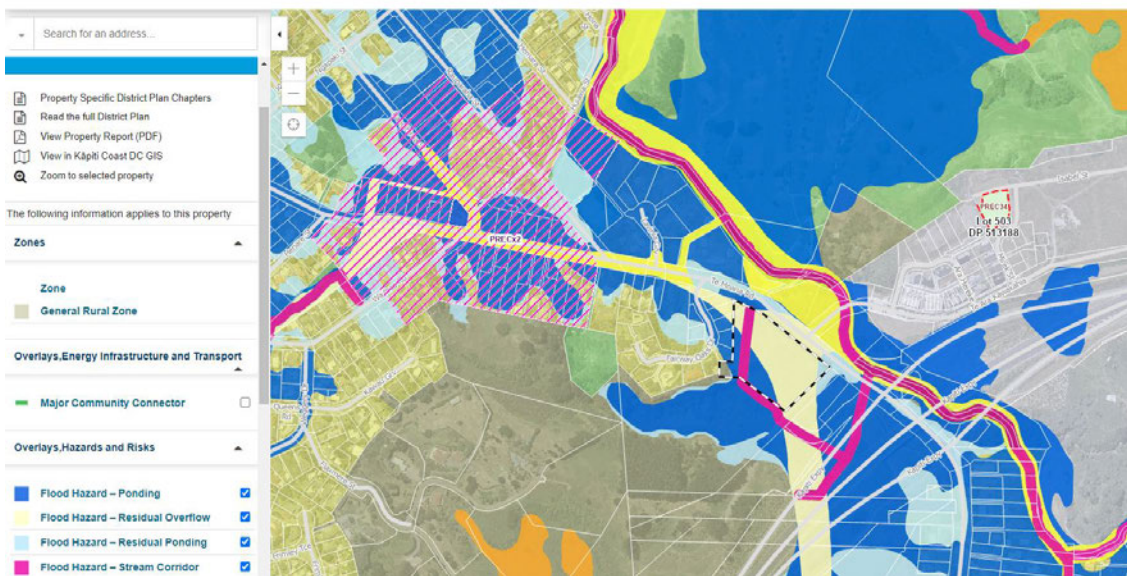
Site Address	100&110 Te Moana Road, Waikanae
Legal Description	Parcel: Lot 1 DP 71916 Parcel: Part Lot 2 DP 71916
Study Area Reference (BM 2022)	WB-02
	
Record of Title	687238 WN44C/426
Registered Interests	<p>Fencing Covenant in Transfer 11702654.1</p> <p>Subject to Part IVA Conservation Act 1987</p> <p>Subject to Section 11 Crown Minerals Act 1991</p> <p>11702654.2 Encumbrance to New Zealand Transport Agency</p> <p>11513765.1 Encumbrance to New Zealand Transport Agency</p> <p>B429547.1 Open Space Covenant pursuant to Section 22 Queen Elizabeth the Second National Trust Act 1977</p> <p>Fencing Covenant in Transfer 11752513.2</p> <p>B311436.3 Encumbrance to Kāpiti Coast District Council</p>

Site Area	5.49 ^{ha}
District Plan	Kāpiti Coast Operative District Plan 2020
District Plan Zone	General rural zone
District Plan Feature(s)	Rural Dunes Precinct Coastal Environment Ecological Site K068
District Plan Hazard(s)	Flood Hazard – Ponding Flood Hazard – Residual Ponding Flood Hazard – Residual Overflow Stream corridor
District Plan Transport Network Hierarchy	Major Community Connector
Proposed Plan change 2	<u>N/A</u>
Regional Policy Statement	Regional Policy Statement for the Wellington Region 2013
Regional Policy Statement Feature(s)	N/A
Regional Plan	Proposed Natural Resources Plan Appeals Version 2019
Regional Plan Feature(s)	Category 2 Surface Water Bodies Lowland areas for Category 2 Surface Water Bodies Schedule F – ecosystems and habitats with significant biodiversity values
Regional Hazard(s)	Combined Earthquake Hazard Tsunami Hazard

4.1 Site background

Currently the site is zoned the general rural zone. Given the increasing urbanisation and development surrounding the site to the north along with the established residential urban area towards and noting the local centre as identified in the XX the site would be an ideal candidate for short term development. It is also clear the NPS directs that the district plan facilitates increased densities adjacent to local centre zones and this site meets that criteria.

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



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

Infrastructure

We are aware that there is infrastructure surrounding the site which could be considered ‘ready to go’ this includes water and wastewater infrastructure. Consideration should also be given to potential for access to Rauparaha Street pump station through the site to support the provision of future public wastewater infrastructure, particularly given the potential for concentrated intensification in nearby areas e.g. Proposed Precinct B.

Due to the established residential density in the surrounding areas it is likely there is network capacity and telecommunications which would be available to service proposed residential development.

FIGURE 2 THREE WATERS SERVICES KCDC GIS 2022

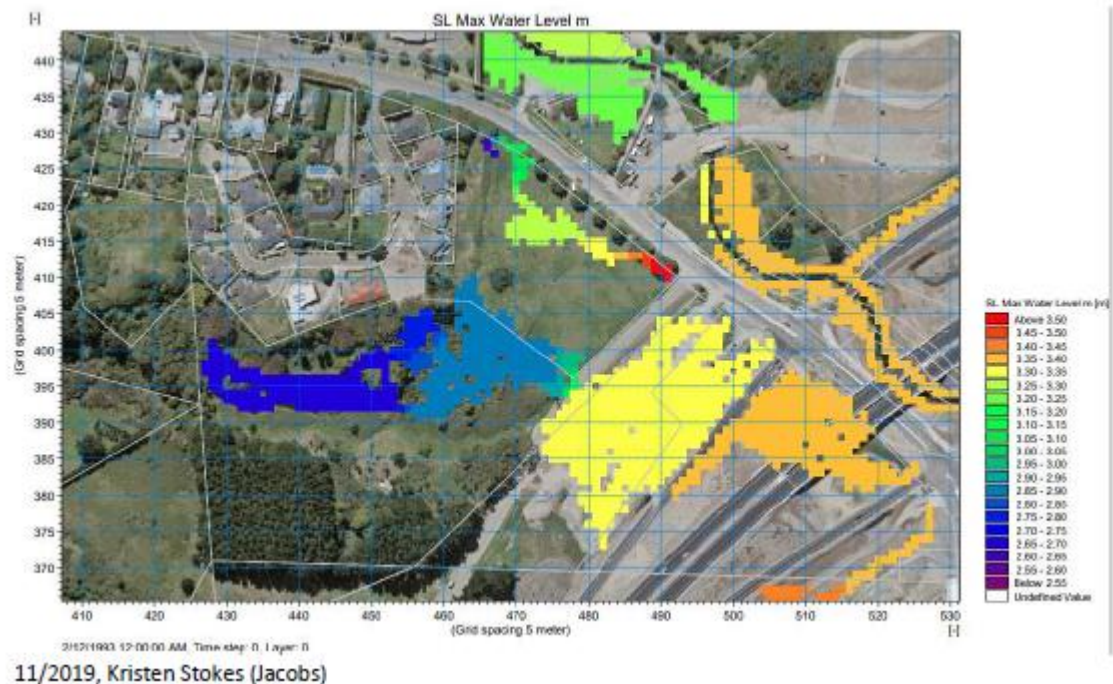


It is also noted that the site is subject to urban rates for land which should be considered in the context of infrastructure and the existing rural zoning.

Hazards and constraints

Figures 1 and 3 refer to Flood Risk Mapping which has been sourced from KCDC district plan and Jacobs consultants. Contrary to the information in the district plan the Jacobs assessment indicates that the site is subject to minor localised surface water and a water body (which is protected by a QEII Trust covenant). This data is in contrast to council current GIS data which we believe only to show pre-expressway flood hazard. The data should be interpreted in the context of the sites contours as provided below.

FIGURE 3 JACOBS FLOOD RISK GIS DATA 2019



It is also evident that the wetland on site has been noted as a significant constraint however we believe that feasible development can be undertaken protecting the values of the wetland and enhancing it as a development feature.

4.2 Growth plan submission

This site is an area which was previously identified as site WB-02 in the Boffa Miskell Greenfield Urban Development Assessment (2021) which we believe informed the proposed rezoning of 13 smaller areas to residential informing Plan Change 2. As part of this process the site was categorised as Priority Area 2B *'a potential candidate for medium- or long-term urban development, however there are several constraints to overcome that may require significant strategic decision-making'* (Boffa Miskell 2020). Our submission highlighted that we did not agree with the categorisation or 'ratings' against many aspects of the site. These points provided rationale and were informed by a comprehensive understanding of the site and its history – arguably this went beyond the initial desktop study.

These points included further insight should be sort in relation to the below:

- Technical assessments
 - Re-evaluated flood risk analysis post expressway development (refer

- Councils updated flood risk modelling)
- Infrastructure analysis (services immediately available in Te Moana Road)
- Amendments to localised DC boundaries for infrastructure funding
- Cultural and ecological investigation
 - Engagement with Iwi and manu whenua to develop greater understanding
 - of heritage issues in relation to the site (supported through Māori
 - landowner relationships)
 - Ecological impacts exploration and design
 - 1 Wellbeing - social, natural, human and financial/physical capital
- Geotechnical and liquefaction issues
 - Further work on ground conditions is appropriate
 - Planning matters are further explored
 - A re-evaluation of site/reassess draft priority rating from '2B' to '1'
 - Further engagement facilitated with council to discuss future development
 - potential, cohesive planning approach, work through approaches to
 - constraints
 - Consideration given to revised yield potential assessment – amending
 - analysis to include development potential to the North of the site

FIGURE 4 GROWTH PLAN SUBMISSION ASSESSMENT 2021

KEY CONSTRAINTS	KEY OPPORTUNITIES
Draft comments for NV-01	
<ul style="list-style-type: none"> • Expressway designation. • Ecological sites, wetlands and waterbodies. • Flooding and liquefaction. • Adjacent wāhi tapu site (urupā). 	<ul style="list-style-type: none"> • Cohesive expansion of established urban form. • Reasonable access to Waikanae town centre
Review comments	
<ul style="list-style-type: none"> • Expressway completed - no longer a constraint • Natural features can be integrated through design and protected as part of development considerations • Flood risk requires further investigation • Precluding northern end of site from development overlooks the benefits of sound engineering and urban design solutions, further investigation is required and warranted. 	<ul style="list-style-type: none"> • Provides a site in areas of co-joining urban form. • Provides for variety of housing types • Natural features provide opportunity for innovative urban design and complement amenity and wellbeing¹ • Infrastructure is existing and can be readily utilised • Creates open space connectivity and regenerative living opportunities.

FIGURE 5 BOFFA MISKELL WB-02 STUDY AREA

Future Urban Study Area WB-02



As part of the Te Tupu Pai- Growing Well engagement process our client made a submission requesting further investigation of the site pre-empting that the desktop study would be influential to the areas being rezoned as part of Plan Change 2/giving effect to the NPS-UD as required by the RMA.

On review of the Proposed Plan change we have reviewed:

- Our original submission
- Councils response to our original submission
- The requirements of the NPS-UD in particular Policy 3 D

Access

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FIGURE 6 WALKABLE DISTANCE 100 TE MOANA ROAD TO LOCAL CENTRE ZONE

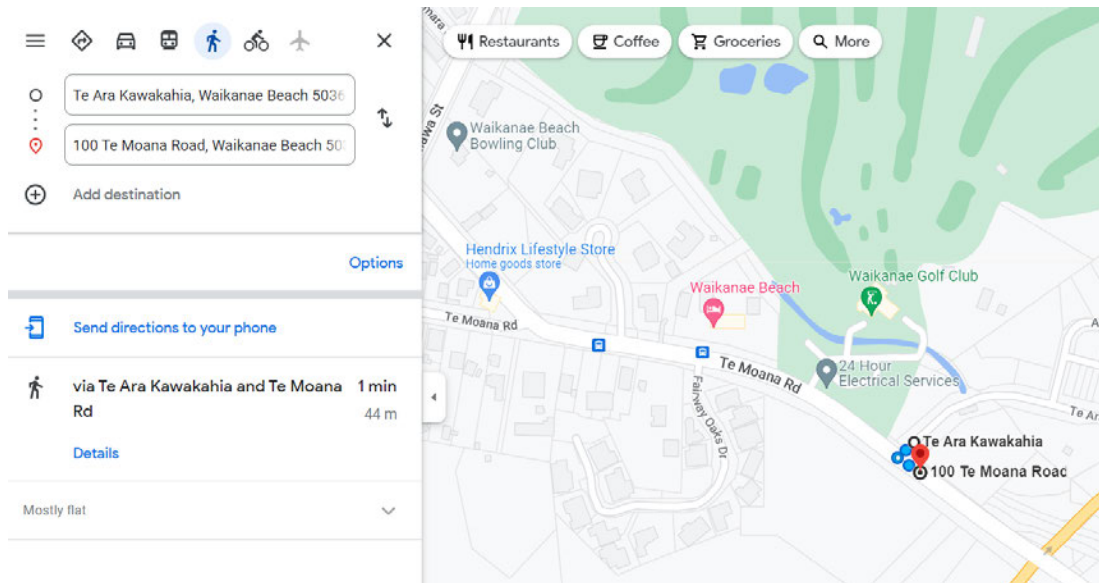


FIGURE 7 SITE FOR INCLUSION IN RESIDENTIAL INTENSIFICATION PRECINCT



5. Commentary Plan Change 2

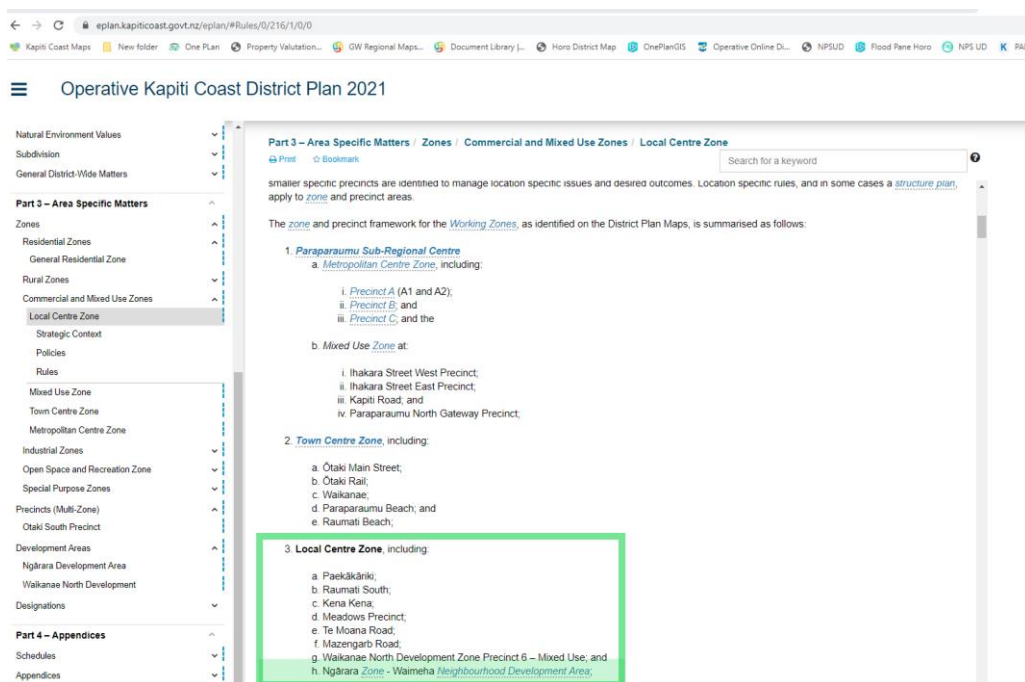
Plan change 2 has identified 'Residential intensification precincts' and applied them to the general residential zone they identify the spatial application of Policy 3. We understand these new precincts are based on proximity to those areas listed in Policy 3 of the NPS UD and the rational around the development of these precinct areas is as proposed in Spatial Application of NPS-UD intensification policies Kāpiti coast district *Boffa Miskell Study 2022*. This methodology is then demonstrated on pages 10-11 of Proposed Plan Change 2 DRAFT.

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

- **Proximity to town centre zone** – Site is adjacent to a local centre zone and borders a developed urban area with a proposed intensification precinct less than 225m away which is proposed to facilitate up to 4 storeys and has a range of similar constraints to this site. We anticipate that a view has been taken that the similar constraints within such close proximity can be managed to support intensification in this area. We believe a similar approach would be reasonable in relation to this site.

It is also apparent that the NPS-UD Policy 3-part D is clear in directing that district plans (tier 1 authorities) to enable development opposite local centre zones. The district plan defines the Ngārara Zone directly as a 'Local Centre Zone' (please see Figure 8), and through DP Policy LCZ-P1. This site is within a 50m walkable catchment/adjacent to a local centre zone in accordance with the district plan. Failure to include provisions in Plan Change 2 reflects that the direction of the NPS-UD is being inadequately incorporated in line with the relevant provisions of the RMA.

FIGURE 8 LOCAL CENTRE ZONE KCDC DISTRICT PLAN 2021



- **Alignment, context and urban form** - Although currently a rural zone the character and context of the area is changing and being increasingly urbanised. In particular the site is within close proximity to a proposed intensification precinct where development of a higher density is anticipated and opposite a developing local centre.

*“...within and **adjacent to** neighbourhood centre zones, **local centre zones**, and town centre zones (or equivalent), **building heights and densities of urban form commensurate with the level of commercial activity and community services**” (Pg 11 NPS UD 2020)*

Further consideration should be given to the fact the site is not a submersed rural site but an area on the fringes of increasing urban development. The rural zoning is arguably fragmented and not reflect of growing urbanisation. Cohesive patterns of urban development are key to good urban design and clustering development around local centres and existing urban areas is an important focus of that – as documented by a range research and direction within the district plan. This site provides an opportunity to provide housing which would be of a lesser density but complementary to the proposed higher density anticipated in the area around an increasing urbanising area. We note key focuses of the district plan, NPS-UD and Te tupu pai is the provision of ‘Diverse housing options’ (KCDC 2022). Although we acknowledge that studies have shifted council focus to housing of a certain type advocating that with a narrow focus is not in line with the intent of providing a range of housing options. A larger vacant lot also has the potential to host a range of innovate design options which could support broader objectives e.g. sustainability and climate change. We note that the site is also in a prime location being directly connected to the town centre via public transport and within walking distance to its local and neighbourhood centres. It is noted that there is a small area of productive land which has been previously defined a ‘relatively non-cohesive’ (Boffa Miskell 2022) as the surrounding rural land is fragmented. Additionally the ecological site and features could inhibit productive activities on the site.

- **Feasible management of constraints** – In its response previous submissions the council noted that this site was ‘subject to a range of constraints’ (Appendix B Summary of submissions on Draft PC 2 2022). We are aware there are a number of considerations in relation to the site which will require a planned and strategic management approach but we do not believe these amount to ‘sufficient complexity’ (KCDC 2022) and as such should not be considered reasonable impediments to shorter term development or for the purpose of rezoning in this context. The four constraints noted in the Greenfield assessment are provided further commentary with particular though given to surrounding context and decisions made around nearby sites noted to have similar constraints.

Expressway Reserve Sensitivity/designation	<ul style="list-style-type: none"> • Can be managed through design we note that the notion of higher density development will require utilisation of sites with constraints and as such will require innovative design
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	<p>and thinking. Should not impeded short term potential. We note the local centre/ Ngārara zone provides residential uses which would have similar considerations around reserve sensitivity. Additionally the expressway designation may no longer be considered as pertinent as work is completed and no future works planned we are aware of. Designation issues could also be managed through district plan provisions.</p>
Flooding and waterbodies	<ul style="list-style-type: none"> A number of provisions and strategies to manage flood risk which is a nationwide/district wide issue. Flood risk is a significant consideration, and we note that further information to date indicates initial council assessments of the risk may well be overstated. However, provisions in the district plan would manage flood risk as appropriate to mitigate or remedy any adverse effects considered part of future development. We also note the intensification precinct within close proximity which has a very similar flood risk constraints – we assume council has taken the view these constraints in that very nearby area can be managed. Arguably the management of flood risk on vacant site where a planned approach to development can be taken may be undertaken more efficiently than within areas where existing developments limit management options.
Ecological site, wetlands and waterbodies	<ul style="list-style-type: none"> The ecological area is an important feature of the site which requires careful management and protection. We note the importance of wetlands and their role in the environment. In relation to this site the wetland is located in an area where development would not be anticipated. We note that there are a range of national, district and local provisions which are in place to manage development around areas where there are natural wetlands/ecological and these guidelines and policies would be followed accordingly. We also note that the extension of wetlands ‘constructed’ wetlands in particular can be a positive feature of development. We believe that sustainable development could take place alongside the protection of natural features of the site and that this should not impeded opportunity for shorter term development.
Adjacent wāhi tapu site (urupā).	<ul style="list-style-type: none"> We acknowledge wāhi tapu and the importance of careful consideration around development in these areas. We note that wāhi tapu overlay does not extend in to this site. However, engagement with Manu Whenua around such issues is an important part of the future development for this site. Again district plan provisions facilitate such engagement, we also note that Manu Whenua as a treaty partner will be engaged as part of the plan change process.

- Site would not require structure plan approach/future plan change process** – The site size and the existing residential and complementary uses (e.g. local centre) would mean that a structure plan/private plan change approach isn’t considered feasible to support particular

given the time and costs involved when there is a process directed at facilitating this type of opportunity at present. It would be pragmatic to support this recommendation through plan change 2 as supported and we believe directed by the NPS-UD. It is also apparent that there are other examples of rural areas which have been considered suitable for proposed rezoning as part of plan change 2 which share similarities in principle (Council owned Land Rangiuru Road, Otaki).

- **Would provide a notable contribution** – Given the existing development in the area and the site area of over 5ha this change request could result in a modest yet notable potential contribution to housing supply which would support the district in meeting its housing aspirations. It has been previously anticipated approximately 2ha of the site could be developable with a potential yield of approximately 120 dwellings.
- **‘Ready to go infrastructure’** – Future development on site can be facilitated through existing infrastructure (and including upgrades) these are achievable given the existing surrounding provisions. Specifically water and wastewater, are available Infrastructure provisions for the site are documented in Section 4.1 of this report align with the NPS-UD definition of ‘Ready to go’. It is further noted that the site contains opportunity for **critical** infrastructure link (wastewater standby main main).
- **Development with strong potential ‘to be realised’** – We note that to achieve the objectives for the NPS-UD there are many variables at play. Giving effect to the policies in the NPS-UD is sort to enable higher density of development however often but there are no guarantees that development will ‘be realised’ on a number of sites where it is in fact enabled. It is pragmatic to include where appropriate sites where development has a strong potential ‘to be realised’ as it will support the region in meeting its housing need requirements efficiently. It should also be highlighted that subjected site prime (and directed) for shorter development to future plan change processes will be cost and time prohibitive for many and will also bring additional (and potentially unanticipated) workload to council which arguably will be determinantal to the actual short term delivery of much needed housing in the area. It is further noted in relation to infrastructure that the site has potential to facilitate general wastewater provisions and infrastructure in the wider area which would be key for future intensification.
- **Risk Management** – We note that a change of ‘zone’ alone will not automatically enable substantial development on this site and that future development will be subject to a number of national, regional and local district plan provisions. With that in mind consideration around the ‘constraints’ ,which we understand have contributed to the decision to exclude this site from Plan Change 2, would be managed and risks mitigated accordingly. Due consideration believe should be given to this point any rezoning at this point in time would provide opportunity for the future with key levers for management.

5.1 Giving effect to NPS-UD 2020

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

- Policy 1 – incorporating the recommendation to proposed plan change 2 will contribute to a well-functioning urban environment
- Policy 2 – Can contribute to sufficient development capacity to meet demand for housing in the short term- it is very uncertain that the 13 small areas rezoned will

provide sufficient short term capacity to give effect to Policy 2 this site has the potential to yield 100 dwellings whilst carefully managing any constraints

- Policy 3 – 77G of the RMA sets out the duty of territorial authorities to give effect to Policies 3 & 5 of the NPS-UD. Policy 3 specifically directs that intensification is facilitated in areas within and adjacent to local centres (which this site is clearly defined as through the district plan) however this site has been omitted from consideration – this appears contrary to clear direction of Policy 3 part D.

We believe that the exclusion of this area from a proposed intensification precinct will be contrary to the specific detail of Policy 3 (d) NPS UD 2020 as per RMA requirements under Sections 77G.

We seek the following decision from KDC

We require that this site (area demonstrated in Figure of this submission) is rezoned to 'residential' area demonstrated in Figure 7 of this submission and in accordance with the provision of NPS-UD. 2020 with particular focus on Policy 3 part (d).

Annexures

Trade Competition

Trade Competition [select the appropriate wording]

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

I could ☐ / I could not ☐ gain an advantage in trade competition through this submission.

If you could gain an advantage in trade competition through this submission, please complete the following:

I am ☐ / I am not ☐ directly affected by an effect of the subject matter of the submission that—

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition.

References and Sources

Kāpiti Coast Urban Development Greenfield Assessment *Boffa Miskell* 2022

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

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

Source:

https://www.kapiticoast.govt.nz/media/wnic5k0t/pc2_s32_appendix_spatialapplicationpolicy3.pdf

KCDC Three Waters GIS

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

Operative Kāpiti Coast District Plan 2021

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

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

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

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

Source:

https://www.kapiticoast.govt.nz/media/04bbdt13/pc2_s32_appendixb_draftpc2feedback.pdf

[Accessed on 14/09/2022] National Policy Statement on Urban Development 2020 Updated May 2022 *Ministry for the Environment* 2022

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

Attachments

100-110 Te Moana Road Site Specific Submission - Te tupu pai – Growing Well *Landlink* 2021

100&110 TE MOANA ROAD – OSBORNE, SITE SUBMISSION



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

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Executive Summary

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

This submission is a site-specific response to 'Te tupu pai' and its underlying assessment (*Kāpiti Coast Urban Development Greenfield Assessment Draft 2021 Boffa Miskell*). As a trusted advisor in land development with a breadth of local knowledge – the issues presented in this submission provide a further overview of information which is imperative when considering future land development opportunities in the area and ensuring sufficient capacity in meeting long term growth. As such we are seeking the further investigation and the re-consideration of the priority ratings provided against 100/110 Te Moana Road, Waikanae.

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

Site profile

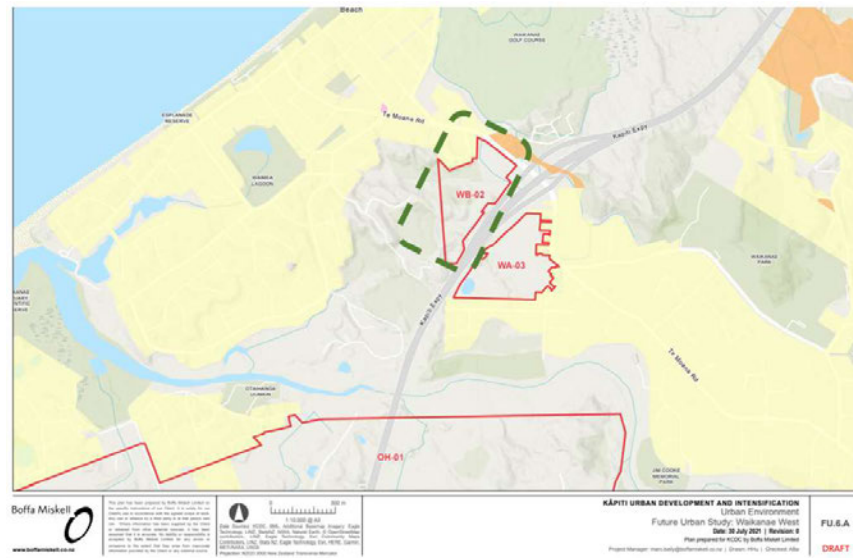


Figure 1: Future Urban Study Area WB-02 – Kāpiti Coast Urban Development Greenfield Assessment 10/2021

Overview

- WB-02— (*Future Urban Study Area Reference – Boffa Miskell*)
- Total Ha -10.4ha
- Currently Priority area 2B

Location

- 100 Te Moana Road – 1.531 ha
- 110 Te Moana Road – 3.96 ha
- 53% (approx.) of WB-02 site
- Client – Vince Osborne

Kāpiti Coast District Plan

- | | | |
|------------------------|-------------------|-----------------------------|
| • General rural zone | • Ponding hazard | • Coastal Environment |
| • Rural Dunes Precinct | • Stream corridor | • Major community connector |

Greater Wellington Region Natural Resources Plan

- | | |
|---|---|
| • Schedule F – ecosystems and habitats with significant biodiversity values | • Lowland areas for Category 2 surface water bodies |
| • Category 2 surface water bodies | |

Site Summary

The area identified as site 'WB-02' is a well-connected and well serviced area primed for future growth and development. As such we strongly recommend it is further investigated and re-evaluated to 'Priority Group 1'. Investment in infrastructure and services over the years have brought services 'to the door' of the site. There is accessible sewer, water, roading, electric and telecommunications infrastructure providing a unique opportunity in terms greenfield development of enabling go in terms of short-term future residential and/or mixed-use development. The areas natural features would be mutually complemented through residential development which would have high amenity values, providing further peri-urban choice to a region planned to become denser at its urban core. We also note further development of this site would be complementary to the adjacent and recently and successfully developing mixed use area.

Since the expressway has been completed there would be the possibility to facilitate further residential and mixed use of the area including areas previously designated for the expressway.

High-quality urban design could mediate issues which may be anticipated through reserve sensitivity considerations. A considerable number of landowners in the area have signalled support for the utilisation of this area for residential/mixed use development. The provisional '2B' priority rating of this site overlooks its positioning as a pragmatic and strategic greenfield (upzoning) development option to support shorter term growth in an established and well serviced area. Our comparative assessment below strongly indicates that aspects of the site labelled as 'constraints' – largely the ponding hazard and wetland features have been unjustly weighted to preclude shorter term development underestimating the positive benefits of residential development on this site.

Criteria rating Assessment

CRITERIA RATING				
Criteria	Headline Observations	Draft Rating	Commentary	Proposed rating
Mana whenua values	Takamore Urupa location/archaeological sites		Development in consultation with Manu Whenua/Māori landowners. Supporting development around heritage, natural features and manu whenua values.	
Iwi development aspirations			Local Māori landowners have indicated openness to exploring potential of future development e.g. papakāinga housing.	
Urban form	Cohesive consolidation of urban form		Excellent opportunity to integrate with existing urban environment along key transport corridor, current planning	
Local neighbourhoods	Extension of established neighbour		Would be an extension of surrounding neighbourhoods including but not limited to the Waikanae beach/Te moana road	
Activity centres	Good access to local centres		Numerous connection points to established activity centres	
Residential Development	Combined constraints undermine housing feasibility considerably		Comprehensive planning required and to realise potential - further investigation required to mediate flood risk and increase projected density provision. Contribution to dwelling supply potentially understated.	
Business land	No business land		Business land not proposed but integrated into well-functioning urban environment site is connected to business provision.	
Transport networks	Well-connected		Good access to SH1, Te moana Road (link to rail), Public transport existing and proposed.	
Infrastructure and Servicing	Scale of development could trigger upgrades		No major upgrade of infrastructure anticipated due to existing provision.	

Natural ecosystem values	Identified ecological sites and wetlands in the area		Enhancement of ecological sites is a priority and community asset. Residential development to utilise and protect surrounding natural features supporting innovation and well-being.	
Water bodies	Number of wetlands in the area		Wetlands can be integrated as an incredible feature of residential development and complementary open space uses. Potential restorative opportunities.	
Landscape and open space values	No special amenity landscapes		Note rural dunes precinct - surrounding open space allows for high amenity value living	
Heritage Values	No listed heritage values/number of archaeological sites in the area		Manu whenua values and development in consideration and engagement with manu whenua/lwi. Local and adjoining Māori landowners have signalled support for future development discussions.	
Topography	Relatively hilly area		Development proposed to occur in flatter areas	
Natural hazards and land risks	High flood risk		Flood risk can be mitigated and requires further analysis - current flood mapping is outdated (pre-expressway development) low quality data should not preclude the site from future priority development.	
Land use compatibility	Reverse sensitivity SH1		High quality urban design can mitigate amenity issues from noise, pollution, visual and amenity effects. Higher density urban living needs to be considered in relation to the presence of infrastructure i.e. development often targeted around transport infrastructure. Also provides opportunity to utilise land previously designated for highway which is complete.	
Highly productive land	LUC1 soils which discontinuous with other productive areas		Incohesive and lack of potential for significant scale productive purposes due to surrounding infrastructure and residential uses	
Climate change (low carbon futures)	Consolidation of existing urban form		Consolidation of existing urban form	

KEY CONSTRAINTS	KEY OPPORTUNITIES
Draft comments for NV-01	
<ul style="list-style-type: none"> • Expressway designation. • Ecological sites, wetlands and waterbodies. • Flooding and liquefaction. • Adjacent wāhi tapu site (urupā). 	<ul style="list-style-type: none"> • Cohesive expansion of established urban form. • Reasonable access to Waikanae town centre
Review comments	
<ul style="list-style-type: none"> • Expressway completed - no longer a constraint • Natural features can be integrated through design and protected as part of development considerations • Flood risk requires further investigation • Precluding northern end of site from development overlooks the benefits of sound engineering and urban design solutions, further investigation is required and warranted. 	<ul style="list-style-type: none"> • Provides a site in areas of co-joining urban form. • Provides for variety of housing types • Natural features provide opportunity for innovative urban design and complement amenity and wellbeing¹ • Infrastructure is existing and can be readily utilised • Creates open space connectivity and regenerative living opportunities.

Revised Yield Potential

The development is likely to be focussed on the Te Moana frontage (due to the fact that the stormwater issue has been alleviated as shown below) with a likely additional 40-80 dwelling units.

This would be likely to double the immediate yield expectations.

Recommendations

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

Further investigation is undertaken on site 'WB-02' focusing on:

- Technical assessments
 - Re-evaluated flood risk analysis post expressway development (refer Councils updated flood risk modelling)
 - Infrastructure analysis (services immediately available in Te Moana Road)
 - Amendments to localised DC boundaries for infrastructure funding
- Cultural and ecological investigation
 - Engagement with Iwi and manu whenua to develop greater understanding of heritage issues in relation to the site (supported through Māori landowner relationships)
 - Ecological impacts exploration and design

¹ Wellbeing - social, natural, human and financial/physical capital

Geotechnical and liquefaction issues

- Further work on ground conditions is appropriate

Planning matters are further explored

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

Additional Information

- As noted in our criteria assessment there are a number of landowners within WB-02 to the south of our client's site that have signalled openness to exploring future development
- These landowners are Māori landowners and the landowner representative is Tony Ropata
- We understand that Council are interested in connecting the standby wastewater main which runs from the treatment plant to the Rauparaha Street pump station through this site and the landowners are open to facilitate this connection.
- The presence of natural wetlands onsite do not preclude development in accordance with the National Policy Statement for Freshwater Management 2020 – we are confident feasible development can be achieved.

Alignment with draft Te tupu pai principles and objectives

Enabling Choice

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

Valuing our environment

- Opportunity to retain, manage and integrate natural features of the site into residential scenarios which have high amenity values
- Ensuring the development of land practices good urban design principles utilising the natural environment and integrating natural design features (e.g. Wetlands)
- Ensuring the site is used to provide efficient and appropriate density of development
- Clustering greenfield development in established residential settings (neighbouring the site)

Fostering strong communities

- This site is incredibly well connected with its location next to the SH 1 provided direct links to North and South – and being surrounded by established public transport networks
- Provides for development in established residential communities with a strong sense of identity.
 - Provides housing potential in an area which already hosts a range of amenities and services (schools, health care facilities, open space)

Supporting Manu Whenua Aspirations

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

Encouraging low carbon living

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

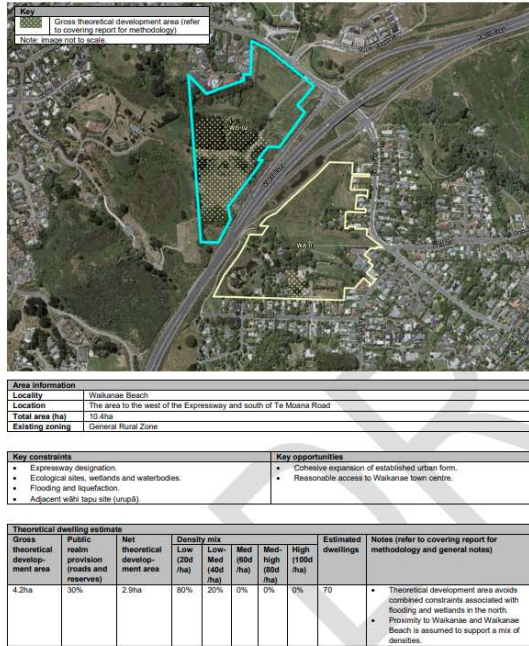
Embracing the opportunities of growth

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

ANNEXURES

Urban Study WB-02 Area Reference

Future Urban Study Area WB-02



Criteria	Observations	Rating
Mana whenua values	<ul style="list-style-type: none"> The Takamore urupā is located in the area, and there is a wider with tapu area associated with this that covers the majority of the western half of the area. There are a number of archaeological sites located throughout the area. The influence Takamore urupā and with tapu site to the west is a highly site, and there is likely to be sensitivity towards urban development near the site. 	
Iwi development aspirations		
Urban form	<ul style="list-style-type: none"> Development of the area would function as a cohesive consolidation of urban form at Wakanae, although constraints associated with the site mean that development is likely to establish away from Te Moana Road. 	
Local neighbourhoods	<ul style="list-style-type: none"> Development of the area would be an extension of the established neighbourhood at Wakanae Beach. 	
Activity centres	<ul style="list-style-type: none"> The area has good access to the local centre on the corner of Te Moana Road and Waimea Road. Development of the area is likely to support the development of the existing local centre. Wakanae town centre is located approximately 4km to the east, along Te Moana Road. The nearest schools are at Wakanae to the east. 	
Residential development	<ul style="list-style-type: none"> Combined constraints in the area limit the theoretical development area, and as a result the potential to contribute to housing supply is marginal. 	
Business land	<ul style="list-style-type: none"> There is no existing business zoned land in the area. 	
Transport networks	<ul style="list-style-type: none"> There is access to the area from Te Moana Road, Flaxmere Street and Gates Road. The area has immediate access to the Expressway via the adjacent interchange. There is an existing bus route that runs along Te Moana Road. There is reasonable access to Wakanae Station and town centre via active modes along Te Moana Road. Some parts of Te Moana Road include a cycle lane. 	
Infrastructure and servicing	<ul style="list-style-type: none"> Water supply and waste water reticulation extent in to the area via Flaxmere Street. Depending on scale, development in the area may trigger upgrades to the existing waste water plant, and/or pipes and pump stations between the area and the plant. 	
Natural ecosystem values	<ul style="list-style-type: none"> There are a number of identified ecological sites associated with wetlands in the area. There is a QELI covenant site located in the north of the area. 	
Water bodies	<ul style="list-style-type: none"> There are a number of significant wetlands located throughout the area. A tributary to the Wakanae River is located in the south-western extent of the area. The Wakanae Stream is located to the north of the area. A drain that flows to the stream runs through the north of the area. 	
Landscape and open space values	<ul style="list-style-type: none"> There are no identified special amenity landscapes in the area. The area has good access to open spaces within Wakanae Beach, as well as coastal open space. 	
Heritage values	<ul style="list-style-type: none"> There are no listed heritage features in the area. There are a number of archaeological sites located throughout the area. 	
Topography	<ul style="list-style-type: none"> The area is relatively hilly. 	
Natural hazards and land risks	<ul style="list-style-type: none"> North eastern and south-western parts of the area are identified as being subject to flood risk. High consequence hazard associated with the flooding of the Wakanae river in this location. The majority of the area is identified as being subject to high liquefaction risk. There is a SLUR site located along the northern extent of the area. 	
Land use compatibility	<ul style="list-style-type: none"> A significant portion of the area is covered by the Expressway designation, although this could be reviewed with Waka Kotahi, and is not necessarily a constraint. Development is likely to have reverse sensitivity effects on the Expressway. Established rural lifestyle development in the area may be resistant to urban development. Significant presence of urupa and with tapu sites cover much of the western extent of the area. The north-eastern portion of the area is identified as LUC 1, however it is relatively discontinuous with other potentially highly productive areas. 	
Climate change (low carbon futures)	<ul style="list-style-type: none"> Consolidation of existing urban form and connecting to established infrastructure services is likely to be less resource intensive. The area has good access to activity centres and regional public transport, with reasonable opportunities for access to these areas by active modes of transport. 	

Notes:
 * Some high-level observations were provided during a workshop with Council officers in July. Observations are subject to further engagement with mana whenua.

Kāpiti Coast Urban Development Greenfield Assessment 13/10/2021

Wetland Extent

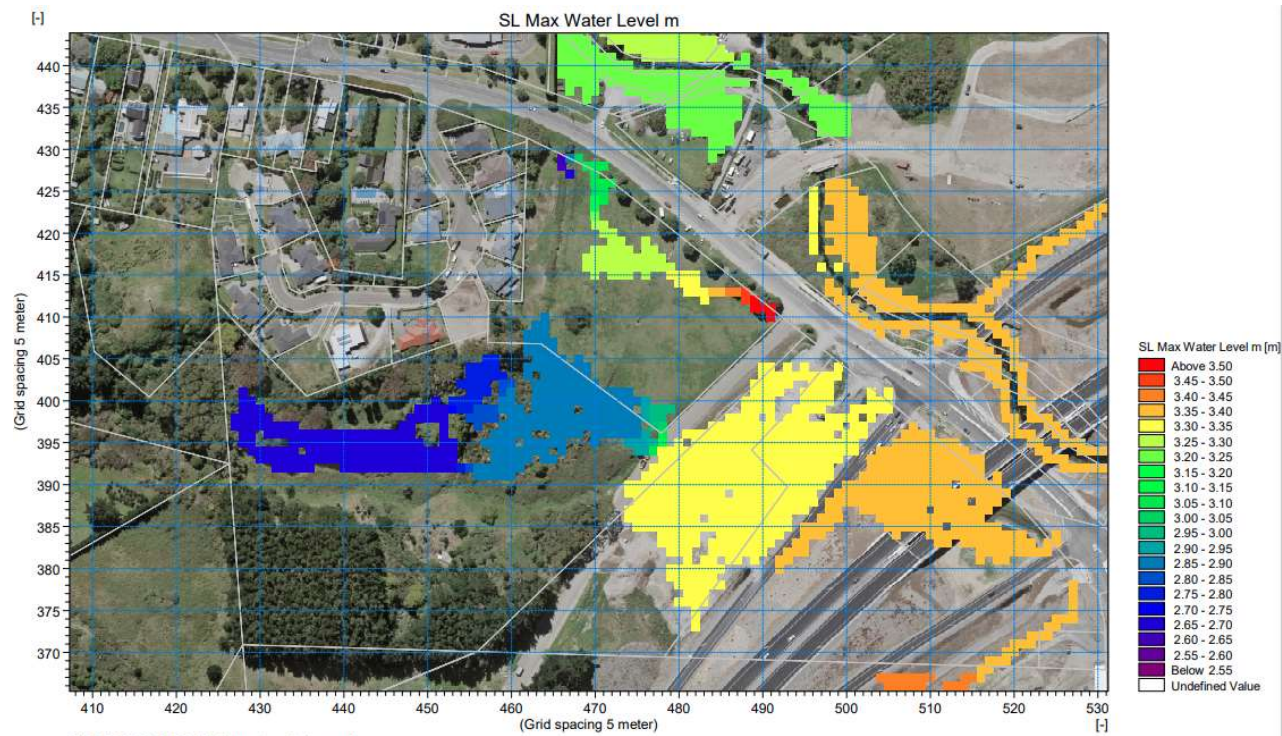


Source: Current Wetland Extent MFE 2013 (Accessed 17/11/2021)

<https://data.mfe.govt.nz/layer/52676-current-wetland-extent-2013/>

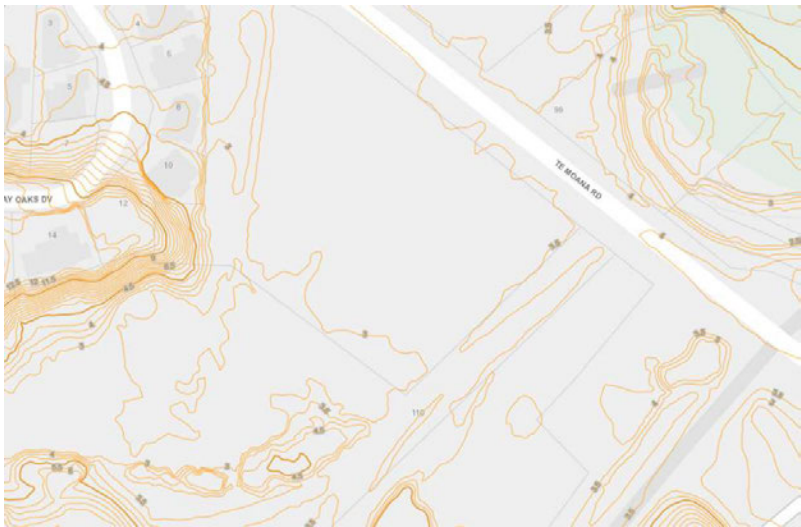
Flood Risk Mapping

The attached plan has been sourced from Councils flood mapping consultants (refer Rita O’Brien and Jacobs emails from Nov 2019) and indicates that the site is subject to minor localised surface water and a water body (which is protected by a QEII Trust covenant). This data is in contrast to council current GIS data which we believe only to show pre-expressway flood hazard. The data should be interpreted in the context of the sites contours as provided below.



11/2019, Kristen Stokes (Jacobs)

Site contours



Source Kāpiti Coast District Council GIS: Flood Hazards Accessed 18/11/2021

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

Existing Services Adjoining the site



Source Kāpiti Coast District Council GIS: 19/11/2021

From: [Marie Payne](#)
To: [Mailbox - District Planning](#)
Subject: [#LL-2584] Growth Plan Submission 100/110 Te Moana Rd
Date: Tuesday, 27 September 2022 1:41:53 pm
Attachments: [image002.png](#)
[image004.png](#)
[Plan Change 2 Site Submission 2584.pdf](#)
[Site specific WB-02 Growing Well Submission Landlink21.pdf](#)

Kia ora,

Please find attached the submission for 110-110 Te Moana Road.

Kind regards,

Marie



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

