Operative Kapiti Coast District Plan 2021

Private Plan Change 4 – Welhom Developments Limited

Section 42A Addendum Report

Request to rezone part of 65 and 73 Ratanui Road, Otaihanga

3 February 2026

Report prepared by
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Consultant Planner

Contents

1 Executive Summary 3

2 Introduction and purpose of this addendum 3

3 Activity status for retirement villages 4

4 Recommended amendments to DEV3-P1(4) and DEV3-P2(5) regarding buffer widths and heights of buildings 8

5 Amendments to DEV3-P1(4)(d) and DEV3-P2(5)(d) to include reference to natural landform 11

6 Wetlands and the indicative extent of central restoration wetland and stormwater management area. 12

7 New and amended national direction 13

8 Conclusions and Recommendation 13

Appendix 1 – Updated Appendix 4 Recommended Amendments to PPC4 Provisions 14

Appendix 2 – Further analysis of existing District Plan provisions 15

Appendix 3 – Updated Appendix 2 - Memorandum from Council's Manager Urban Planning and Research 16

Appendix 3 – Updated Appendix 7 – Urban Design Report 17

Appendix 4 – Updated Appendix 12 – Landscape, Natural Character and Visual Amenity Report. 18

Appendix 6 – Updated Appendix 13 – Ecology Report 19

Appendix 7 – Addendum Urban Design Report 20

Appendix 8 – Addendum Landscape, Natural Character and Visual Impact Report 21

Appendix 9 – Addendum Ecology Report 22

1 Executive Summary

1. This section 42A addendum report was released on 3 March 2026. It serves as rebuttal to the Applicant and Submitters' expert evidence provided in accordance with Hearing Direction 1 of the Hearing Panel.

2. The matters I address cover:
   - The recommended activity status for retirement villages
   - Recommended amendments to DEV3-P1(4) and DEV3-P2(5) regarding buffer widths and heights of buildings
   - Amendments to DEV3-P1(4)(d) and DEV3-P2(5)(d) to include reference to natural landform
   - Wetlands and the indicative extent of central restoration wetland and stormwater management area
   - New and amended national direction

3. I have provided an updated Appendix 4 (as Appendix 1) which record my amended recommended amendments to PPC4 provisions in response to the above.

4. The Hearing Panel also rightly identified that the evidence provided in Appendices 2, 7, 11 and 12 of my s42A reports did not include the qualifications, experience and confirmation of adherence to the Environment Court's Code of Conduct of those experts. Updated statements of evidence are provided (as Appendices 3 to 6).

5. Council's Urban Design, Landscape Architect and Ecologist have also prepared Addendum Reports, which I have reviewed. These are appended as Appendices 7 to 9.

2 Introduction and purpose of this addendum

6. This is an addendum to my s42A report. It solely focuses on matters raised in the Applicant and Submitters' expert evidence that I consider it appropriate to address prior to the hearing commencing, to assist the Hearing Panel in their consideration of PPC4 and submissions on it. It is to be read in conjunction with my s42A, while noting that I have changed my recommendations to some matters. Where recommendations in this report differ to those in my s42A report, they supersede those in my s42A report. Ms. Popova, Ms. McArthur and Dr. Dijkgraaf have also prepared addendum reports which are appended as Appendices 7, 8 and 9 respectively. I have reviewed their addendums in preparing my Addendum Report.

7. In accordance with Direction 1 of the Hearing Panel, this addendum s42A report responds to matters in the Applicant and Submitters' expert evidence. I confirm that I have read through all the Applicant's and Submitters' expert evidence.

8. The matters I address cover:
   - The recommended activity status for retirement villages
   - Recommended amendments to DEV3-P1(4) and DEV3-P2(5) regarding buffer widths and heights of buildings
   - Amendments to DEV3-P1(4)(d) and DEV3-P2(5)(d) to include reference to natural landform
   - Wetlands and the indicative extent of central restoration wetland and stormwater management area
   - New and amended national direction.

9. I have provided an updated Appendix 4 which record my recommended amendments to PPC3 provisions in response to the above. These amendments are shown in green in Appendix 3. I have not changed any of my recommendations to submissions on PPC4.

10. The Hearing Panel also rightly identified that the evidence provided in Appendices 2, 7, 11 and 12 of my s42A reports did not include the qualifications, experience and confirmation of adherence to the Environment Court's Code of Conduct of those experts. Updated statements of evidence are attached as Appendices to this Addendum[1].

11. A full copy of the plan change request, the amended request as a result of a Request for Further Information, submissions, summary of submissions, further submissions, Applicant and submitters' evidence and other relevant documentation can be found on the Council's website[2].

3 Activity status for retirement villages

12. I have reviewed paragraphs 7.69 to 7.73 of his Mr McDonnell's evidence, where he sets out his view that a controlled activity status is appropriate for a retirement village under proposed DEV3-R1.

13. I maintain my position set out in my s42A report that a restricted discretionary activity status remains appropriate under proposed DEV3-R1. I have also undertaken further analysis of the existing District Plan provisions, attached as Appendix 3 and summarised below, and provide the following further reasons for the benefit of the Hearing Panel.

14. Firstly, I highlight to the Hearing Panel that under s104A of the RMA, a consent authority must grant consent to a controlled activity, with any conditions limited to matters over which it has reserved its control, as follows:

> *After considering an application for a resource consent for a controlled activity, a consent authority—*
>
> *(a) must grant the resource consent, unless it has insufficient information to determine whether or not the activity is a controlled activity; and*
>
> *(b) may impose conditions on the consent under section 108 only for those matters—*
>
> (i) *over which control is reserved in national environmental standards, wastewater environmental performance standards, stormwater environmental performance standards, infrastructure design solutions, or other regulations; or*
>
> *(ii) over which it has reserved its control in its plan or proposed plan.*

15. I note that a consent authority may also refuse consent for a controlled activity under sections 106 and 106A, relating to natural hazards and access to allotments (s106 only).

16. The key thing is that the consent authority must grant the consent. In my view, that provides little room for discretion or the council to seek changes to what is sought through an application, so

[1] Appendices 3 to 6

[2] https://www.kapiticoast.govt.nz/council/forms-documents/district-plan/private-plan-changes-underway/proposed-plan-change-4-private-welhom-developments-ltd/

that the change sought does not change the nature of the application itself and frustrate the exercise of consent.

17. While the Quality Planning Website is guidance material and does not have the weight of a statutory instrument, it provides useful guidance for rule drafting and the use of activity status. The material on the website has been developed as a partnership between the Ministry for the Environment, New Zealand Planning Institute, Resource Management Law Association, New Zealand Institute of Surveyors, Local Government New Zealand and New Zealand Institute of Architects.

18. The following is an extract from the "Writing Effective and Enforceable Rules" Guidance Note[3]

In writing controlled activity rules it is good practice to:

- *write rules so that it is clear as to what activities are controlled (either by listing or through any requirements, conditions, and permissions) and where in the district or region the controlled activity status will apply*
- *clearly specify any requirements, conditions, and permissions an activity needs to comply with to be a controlled activity*
- *check whether the matters over which the council has reserved control, will adequately deal with the likely adverse effects of a development at the maximum limits of any requirements, conditions, and permissions*
- *clearly specify the matters over which the local authority has reserved control for assessment purposes and conditions for the consent (note these should be clearly differentiated from the standards and terms to be complied with)*
- *if the matters over which council has retained control are very narrow, would make minimal changes to an application, and could be written as requirements, conditions, and permissions - then consider whether it is more appropriate to make the activity 'permitted' subject to those requirements, conditions, and permissions*
- *consider whether the matters of control would unnecessarily 'skew' the decision-making process (for example, by unduly focusing on conservation values without allowing for alternatives or positive effects to be considered)*
- *consider whether the scope of the resource consent conditions that would be able to be imposed, could adequately address potential effects (e.g. conditions on height may be limited in their effectiveness)*

19. In my view, what the above says is that controlled activity status should only be used where there is little room for discretion, a "check" is being performed through the use of the rule, and there is certainty of the effects arising and their ability to be managed through conditions of consent.

20. Table 1 in Appendix 2 sets out the applicable rules for a new retirement village on the site. I concur with Mr McDonnell that GRZ-R33 would apply to a new retirement village. However, it is where there is a non-compliance with any of the standards (except standard 1) of this rule that I consider problems arise with proposed DEV3-R1 as a controlled activity. In particular, should a retirement village be proposed that did not comply with any of the standards in GRZ-33, DEV3-R1 makes their default a controlled activity, which must be granted. This contrasts to buildings to be used for residential units, for example, which would default to a restricted discretionary activity under GRZ-R36 and GRZ-R37.

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3 https://www.qualityplanning.org.nz/node/611#:~:text=In%20writing%20controlled%20activity%20rules,controlled%20activity%20status%20will%20apply

21. I have considered paragraph 7.72 of Mr McDonnell's evidence carefully, which I set out in full below:

> *However, I consider that retirement villages as a land use activity are entirely appropriate in residential zones, and is almost exclusively limited to these zones elsewhere in the District and around the country. I do not consider that a retirement village should be declined based on its merits as a land use. The consistency with the structure plan can be managed through conditions. Any other potential adverse effects can be managed in accordance with other chapters in the District Plan. In my view, the reporting officer does not raise any matters that suggests there is a potential basis for decline of a proposal. Identically framed matters of control and discretion have the same breadth of discretion, subject to the ability to decline. If both approaches are equally effective, then the more efficient approach should prevail.*

22. I do not agree with Mr McDonnell's position that a retirement village should not be able to be declined based on its merits as a land use (or aspects of it amended through conditions to address effects) and therefore a controlled activity status would apply, given in DEV3-R2 and DEV3-R3 the Requestor proposes a restricted discretionary activity status for both subdivision and a residential development. I consider that residential development as a land use activity is entirely appropriate in residential zones. I also consider subdivision is entirely appropriate in residential zones. Further, I do not understand how consistency with the structure plan would make it appropriate for development of a retirement village to be a controlled activity and a residential development to be a restricted discretionary activity, particularly when the same structure plan and matters of control (R1) and discretion (R3) apply to both land uses and DEV3-P2 also applies to DEV3-R2 (subdivision).

23. As an example, under DEV3-R1 as proposed, the Council would have to grant consent to 20m (or more) high buildings in the retirement village, with only limited ability to impose conditions to address any adverse effects in a manner that would not unduly restrict the exercise of the resource consent. In other words, in my view, the Council could not grant consent to a 20m high retirement village which was subject to a condition limiting the height to 11m. This condition would frustrate the exercise of the consent. However, if the application was for 20m high buildings in a residential development under DEV3-R3, the Council would be able to exercise more discretion over the buildings' height, either through conditions or through refusing consent.

24. Further, in Appendix 2 I have also set out all the matters of control that would apply to a retirement village under DEV3-R1. There would be 18 matters of control in total for DEV3-R1 (and 18 matters of discretion from DEV3-R3), taking into account the matters in DEV3-P1, GRZ-R41 and GRZ-P28. I reviewed the evidence of Ms Gardiner, including how she considers that there "*needs to be flexibility to respond to site-specific conditions and future context, while still achieving the outcomes anticipated in the LVEA*[4]*"*. In my view, this signals that there will need to be detailed consideration of site-specific conditions which may result in the council wanting changes to any future application, which could only occur through the imposition of conditions that must not frustrate the exercise of the consent. Having reviewed all the matters that apply to the two rules, I consider that these do not fall within the ambit of what is considered best practice for the use of controlled activity rule status. Simply, I think there is a significant amount of evaluation required for most of those matters.

[4] Paragraph 6.17

25. I have also been mindful of the findings of the Environment Court in Oji Fibre Solutions et al v Waikato Regional Council [2025] NZEnvC170 regarding controlled activity rules. I am not a lawyer so I have not based my opinion on this case; rather I provide the information for the benefit of the Panel.

26. This case relates to the dispute between the parties of the appropriate "drafting gate" or numerical limit at which the activity status changed from permitted to controlled, or controlled to restricted discretionary or discretionary, to be used for dairy farms.

27. I am aware that this case relates to Plan Change 1 to the Waikato Regional Plan and improvements to the Waikato and Waipa River catchments and as such is a different context to PPC4. I was an expert planning witness to several of the territorial authorities on appeals to PC1, and am, as such, familiar with elements of PC1.

28. Paragraph 187 states:

> *Fish and Game referred to the evidence of Ms Marr that there should be an ability to decline consents because it is necessary to "enquire into" whether farming activities are appropriate, submitting that under a controlled rule, WRC could not grant a consent for different activity to the one applied for:*
>
> > *This raises a question whether a controlled activity could reserve as matters of control, more fundamental matters relating to farming type e.g. stock numbers/scale or intensity of the operation.*

29. Paragraph 196 states:

> *We are satisfied that the condition of the controlled activity rule requiring a reduction in the risk of discharges of the four contaminants will be able to be met without requiring a fundamental change to the activity consented. We do not accept Fish and Game's submission that stock numbers and the scale or intensity of an operation represent a fundamental change to the nature of the operation sufficient to nullify the grant of consent. Such considerations are a normal part of farm management and an accepted component of managing adverse effects on the environment*.

30. Where considering another proposed rule, the Court states in para [561]

> *When considering the risk of acting or not acting in relation to controlled activity status we took into account submissions from Fish and Game and Forest and Bird that s 77A is not unqualified and there are express (e.g. s 70) and implied filters. They referred to Eden v Thames Coromandel District Council, where the Environment Court found that controlled activity status should be used if a council "really considers that consent would always be granted for a particular activity subject only to the terms and conditions that may be imposed…". They also referred to TKC Holdings Ltd v Western Bay of Plenty District Council, where the Environment Court stated:*
>
> > *Section 32(2)(c) requires us to assess the risk of acting or not acting. … given the significant values at play, it is clear the Court should adopt a cautious approach to ensure that any development which occurs is appropriate and maintains or enhances the environmental, cultural, social and archaeological values of the island. We conclude that this precludes controlled activity status.*

31. I have not changed my recommendations in my s42A report.

4 Recommended amendments to DEV3-P1(4) and DEV3-P2(5) regarding buffer widths and heights of buildings

32. In response to submitter concerns, Ms. McArthur and Ms. Popova's evidence and my own review of the Applicant's landscape evidence, in my s42A report I recommended amendments to DEV3-P1(4) and DEV3-P2(5) to include:
    - reference to naturally occurring species
    - specific reference to the Structure Plan to show the location of the proposed vegetated and landscaped buffers
    - the types of treatment anticipated for the vegetated and landscaped buffers, including a minimum anticipated width of 5m
    - a better description of the purpose of the vegetated and landscaped buffers and that they do not apply where transport connection is provided to an adjacent site
    - direction on the form of development to have the tallest buildings towards the middle of the site, where practicable.

33. In my paragraph 264 I also recommended that the structure plan be amended so that the vegetated buffer also extends along the Ratanui Road frontage in addition to those areas already shown, and the landscaped buffer be extended to apply along all other boundaries where the vegetated buffer does not apply. I note that this amendment was not shown on the proposed Structure Plan, as I did not have the means to amend it. However, I consider that this recommendation is clear.

34. Mr. McDonnell has agreed with most of my recommended amendments, except for the minimum width for the buffers and the location of tallest buildings, and he has suggested an amendment to the new clause for the vegetated buffer.

35. While Mr. McDonnell agrees with my recommended amendment to the purpose of the vegetated buffer in DEV3-P1(4)(c)(iii) and DEV3-P2(5)(c)(iii), he seeks to further amend DEV3-P1(4)(c)(iii) so that it reads "provide filtering of views into the site from adjacent dwellings where practicable".

36. In the first instance, I do not support the addition of "where practicable", as the clause describes one of the purposes of the vegetated buffer and its inclusion reduces the scope and certainty of reaching that outcome. Ms. Popova and Ms. McArthur agree.

37. Ms. Popova also recommends that the wording is amended to "from adjacent sites". She recommends the deletion of "dwellings" as the intent of the vegetated buffer is to manage visual effects and impact on views from the surrounding properties in general and not just dwellings. Ms. McArthur agrees. I also concur and I have recommended this amendment.

38. I also note that Mr. McDonnell has not carried through the same amendment to DEV3-P2(5)(c)(iii). I recommend that it should be amended to read the same as DEV3-P1(4)(c)(iii).

39. In paragraph 7.62, Mr. McDonnell disagrees with my recommendations for the 5m minimum width of buffer because:
    (a) *The width should be determined at a consenting level based on the nature and potential effects of the actual development including the bulk and location of any buildings;*
    (b) The approach is inconsistent with other properties zoned GRZ on the same rural / urban boundary which only have a 1 or 1.5m setback.[47] *This setback applies all*

along the area marked in red in Figure 1 below with no requirement for landscaped boundary treatment; and

(c) *The area already has a relatively urban character due to being a pocket of RLZ zoned land bordered by urban development.*

40. In my opinion, Mr. McDonnell's reason to not have a minimum width and rely on the width being determined at consenting level is why a controlled activity status is not appropriate under DEV3-R1 and the restricted discretionary activity status under DEV3-R3 is appropriate.

41. I have reviewed Ms. Popova and Ms. McArthur's Addendums.

42. Ms. Popova reiterates her opinion from her primary evidence in respect of the need for the 5m buffers extending along the entire boundaries. In her paragraph 44.c, she states that should the 5m minimum buffer not be provided, then an alternative but sufficient minimum buffer width be included and the activity status amended to restricted discretionary to allow a higher level of discretion to determine what constitutes a suitable and effective boundary treatment.

43. Ms. McArthur identifies discrepancies between the Applicant's hearing evidence and the original Request. She continues to recommend a minimum 5m width to ensure its effectiveness, given no details on the placement of taller and larger scale buildings on the PC site. In paragraph 5 she states that the buffer area is about ensuring a greater building setback than the MDRS allows for, as well as providing planting and landscape treatments within the interface.

44. Having reflected on both Council's experts' evidence and Mr. McDonnell and Ms. Gardiner's evidence, I would support the deletion of my recommended text that the buffers be a minimum of approximately 5m, but only should the activity status be changed to restricted discretionary for DEV3-R1. The use of a restricted discretionary activity status is in my view consistent with Mr. McDonnell and Ms. Gardiner's evidence as it would provide flexibility to respond to site-specific conditions and future context.

45. Having considered this further, I recommend further amendments to the policy clauses so that they are clearer as to their purpose and the outcome to be achieved. This will provide flexibility and a clear means of assessment through the resource consent process. I have also reflected on my discussion in paragraph 263 of my s42A report that including a rule for a 5m may be considered a "qualifying matter" by modifying the MDRS. This may extend to including a minimum 5m within the policy. Taking this into account, a clearer way through in my opinion is to remove the 5m and rely on policy direction at the time of a resource consent application. To that end, I have recommended a further amendment to the two policies to include a new clause that require specific consideration that the width of each buffer achieves its defined purpose.

46. I recommend deleting the minimum width requirement from my amendments shown in my s42A report and amending the clauses so that they read:

> vegetated buffers ~~on the southern extent of the Site~~ in areas indicated in the DEV-3 – Figure 1: Ratanui Development Area Structure Plan that:
>
> i. comprise predominantly indigenous species ranging from shrubs to mature trees
>
> ii. reflect the ~~more 'wooded'~~ parkland character of the rural residential properties along Ratanui Road

iii. provide filtering of views into the site from adjacent sites,

iv. are of a sufficient width to achieve i to iii above, and

v. do not apply where a transport connection is provided to adjacent sites;

~~providing an appropriate~~ landscaped ~~and/or vegetated~~ buffers in areas indicated in the DEV3- Figure 1: Ratanui Development Area Structure Plan ~~to~~ that:

i. comprise treatments including landscaping, planting, fencing and/or earthbunds, as appropriate,

ii. ensure integration between the new development and adjacent sites and the wider landform ~~soften the transition from a residential to rural lifestyle land use~~

iii. are of a sufficient width to achieve i and ii above, and

iv. do not apply where a transport connection is provided to adjacent sites

47. I have considered Mr. McDonnell's opinion regarding that including the buffers is inconsistent with other properties zoned GRZ on the same rural/urban boundary which only have a 1 or 1.5m setback, with no requirement for landscaped boundary treatments. I do not understand how this aligns with the evidence of Ms. Gardiner, and the inclusion of buffers in the DEV3 policies and rules as notified. From my perspective, buffers may not have been necessary if PPC4 had formed part of a comprehensive rezoning of the surrounding area. However, as I have discussed in my s42A report, PPC4 would result in land zoned GRZ which is predominantly surrounded by the RLZ. Buffers would assist to soften or mitigate the visual and landscape impact on the surrounding RLZ.

48. Further, I note that proposed DEV3-R1 to DEV3-R3 all include a note that "no buildings shall be located in landscaped or vegetated buffers". Where buildings are located within these buffers, I assume that the default activity status would be non-complying under DEV3-R4. However, it is not clear that the "note" is an activity standard. If that is the intent, then I recommend that the "note" be amended to be an activity standard for each rule. However, in my view, the lack of a defined buffer width in the Rules or in the Policies makes this "note" problematic if it is to be treated as an activity standard, as it would also require an evaluation of any resource consent application to determine if it was met. The alternative option the Requestor may want to consider is moving this "note" to the policies. Regardless, having considered this further, this note may be seen as a modification to the MDRS yard setback provisions and may be ultra vires the RMA unless a qualifying matter is considered relevant.

49. In paragraph 7.66, Mr. McDonnell disagrees with my recommendation regarding building heights:

> *From a planning perspective and based on the evidence of Ms Gardiner, I disagree with the reporting officer's recommendation to include policy direction in the Development Chapter requiring "a form of development where the tallest buildings are located towards the middle of the site, where practicable". As I have outlined above, the approach is inconsistent with other properties zoned GRZ on the same rural / urban boundary which only have a 1 or 1.5m setback for buildings (see Figure 1 above), without*

landscaping vegetated buffers. The area already has a relatively urban character due to being a pocket of RLZ zoned land bordered by urban development.

50. Ms. Gardiner's evidence is:

> *7.16 I acknowledge the submitters' concerns regarding the potential visual impact of taller buildings and outdoor spaces near shared boundaries. The LVEA recommends managing these effects through sensitive earthworks and landscape integration, rather than through prescriptive height controls. Specifically, it advises that development platforms should be sensitively and effectively integrated into the existing terrain, with retaining walls minimised in favour of natural batters where practicable, and that vegetated buffers be provided to soften transitions and screen sensitive views. Where outdoor spaces are located near boundaries, layered planting can further reduce visual intrusion and maintain amenity and sunlight. This approach allows flexibility to respond to site-specific conditions while achieving the outcomes anticipated by the LVEA. Imposing fixed height limits, density limits, or rigid buffer dimensions at the plan change stage would unnecessarily constrain design options and is not considered required to achieve these landscape outcomes*.

51. Ms. Popova and Ms. McArthur have also addressed this proposed deletion in their Addendums. Ms. Popova seeks that the recommended clause be retained for the same reasons stated in her evidence. Ms. McArthur recommends retaining the recommended clause for DEV3-P1 Retirement Villages because taller buildings – up to 11m and larger structures, often 50m or more in length are common in local retirement villages and may cause significant visual dominance issues. She does not recommend the same for residential development under DEV3-R2 where the scale and density of future development would be less.

52. My discussion on the buffer dimensions and activity status above also largely applies to this matter. My experience of retirement villages is the same as Ms. McArthur's; that retirement villages do tend to have larger bulk of buildings. I consider it appropriate that DEV3-P1 includes consideration of the location of larger buildings on the site. I therefore recommend that my recommended clause: "have a form of development where the tallest buildings are located toward the middle of the site, where practicable" be retained for retirement villages under DEV3-R1. I prefer Ms. McArthur's evidence that it is not necessary for residential development as new buildings would not be as "bulky".

53. I have not changed my recommendations to submissions in my s42A report.

5 Amendments to DEV3-P1(4)(d) and DEV3-P2(5)(d) to include reference to natural landform

54. In paragraph 7.52, Mr. McDonnell identifies that I failed to bring through my recommended amendment to DEV3-P1(4)(d) and DEV3-P2(5)(d) to include the following wording:

> Development platforms that are sensitively and effectively integrated into the existing terrain along the edges of the Site, particularly at the northern and eastern edges (retaining walls will be minimised in favour of natural batters <u>and natural landforms will be retained and enhanced including through the planting of indigenous species</u> where practicable<u>)</u>.

55. This was an error on my part.

56. Mr. McDonnell responds in paragraph 7.60 that:

> The Development Chapter provides sufficient policy direction with regard to managing the effects of development on landform. I consider that the low level of naturalness as outlined by Ms Gardiner does not justify the protection of existing features of the site from development including the northern dune feature.

57. I maintain that this amendment should occur, for the reasons provided in paragraphs 245 to 252 of my Section 42A report. My recommended amendment is intended to provide more guidance to the policy clauses in the same manner as the guidance on retaining walls. My recommended wording does not require protection, rather retention and enhancement, where practicable. The use of "where practicable" provides flexibility where it is not practicable to retain or enhance the dune. I consider that this is consistent with Policy 36 RPS and Policies EW-P1, CE-P3, CE-P4, CE-P7, GRZ-P7 and GRZ-P12 of the District Plan. Appendix 4 contains my updated recommended amendments to the PPC4 provisions. I have not changed my recommendations in my s42A report.

6 Wetlands and the indicative extent of central restoration wetland and stormwater management area.

58. I have reviewed Dr. Keesing's evidence and Mr McDonnell's evidence in respect to natural wetlands. I note Dr. Keesing and Dr. Dijkgraaf differ in opinion as to whether Wetlands 2 and 17 are natural inland wetlands. Dr. Dijkgraaf states in her evidence[5] that should these be found to be natural inland wetlands that the wetland offset area may need to be greater than currently indicated in DEV3 - Figure 1 of PPC4. In his evidence, Dr. Keesing states that whether these are natural inland wetlands will be a matter for future debate and assessment through a resource consent process and will simply affect the effects management responses and likely the quantum of offset proposed for disturbance. I have also reviewed Dr. Dijkgraaf's Addendum Report, which confirms the same. I note Dr. Dijkgraaf's Addendum Report includes further assessment of the two wetlands in contention.

59. In paragraph 7.80, Mr McDonnell states

> The status of these features is relevant to the Structure Plan as the area of the central restoration wetlands was determined to provide for all future offsetting for wetland reclamations on site. Further, wetland 2 needs to be filled in to provide for the main site access (shown in blue in Figure 2 below). Based on the evidence of Dr Keesing, I consider that the Structure Plan does not need to be amended.

60. I interpret this as to mean that Mr McDonnell is satisfied based on Dr. Keesing's evidence that wetlands 2 and 17 are not natural inland wetlands and that the central restoration wetland areas shown on DEV3 - Figure 1 is a "set" area, and DEV3 – Figure 1 shows wetland 2 as being removed for the main site access. I do not interpret that to be Dr. Keesing's advice. I consider both Dr. Keesing and Dr. Dijkgraaf acknowledge that the final identification of natural inland wetlands is a matter for any future resource consents, under the NES-F and NRP. Further, I note that DEV3 – Figure 1 shows "indicative extent of central restoration wetland and stormwater management area" and "indicative private driveway". To me, this indicates that these areas and locations are not set and may vary through the consent process. I have not changed my recommendations in my s42A report.

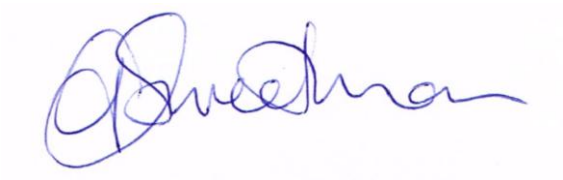
[5] Page 6

7 New and amended national direction

61. I have reviewed Mr. McDonnell's assessment of relevance of the new and amended national direction in paragraphs 5.12 to 5.14 and Table 1 of his evidence. I concur with his assessment and conclusion.

8 Conclusions and Recommendation

62. As I have set out through my primary section 42A report, I recommend that the Panel accepts PPC4, as I recommend it be modified, and accepts, accepts in part or rejects the submissions for the reasons given in that Report and this Addendum.



Gina Sweetman
Consultant Planner
3 February 2026

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