

**BEFORE THE HEARING PANEL
APPOINTED BY KAPITI COAST DISTRICT COUNCIL**

IN THE MATTER OF | I TE TAKE O the Resource Management Act 1991
AND | ME

IN THE MATTER OF | I TE TAKE O Proposed Plan Change 5 (Private):
100 and 110 Te Moana Road,
Waikanae, Kāpiti Coast District

**SUMMARY STATEMENT OF NICHOLAS HILTON TAYLOR
ON BEHALF OF ERIC, VINCE AND RAECHEL OSBORNE**

Dated 21 September 2026

Introduction

1. My full name is Nicholas Hilton Taylor.
2. I have prepared a statement of evidence regarding Proposed Plan Change 5 (Private): 100 and 110 Te Moana Road, Waikanae, to the Kāpiti Coast District Plan (**PC5**), in relation to land development, civil engineering and infrastructure matters. My qualifications and experience and work completed are as set out in that statement.

Earthworks

3. The development will require earthworks to remove peaty soils from development areas, modify ground levels to form road and building platforms, enable road construction, service installation, potential attenuation ponds and constructed wetlands, landscaping and possible geotechnical ground improvement. These works will also include erosion and sediment control measures, vegetation and topsoil stripping and final revegetation of the site.
4. I have completed a conceptual earthworks design premised on both achieving building platforms clear of predicted flood levels (as discussed by Mr Martell) and maintaining the effective function of the residual flow path through the site. This conceptual design is shown on the plan included as **Annexure A** to my evidence.
5. In my experience, dune sand can be compacted to a high degree while retaining the infiltration characteristics required for low-impact stormwater devices such as soakage systems. Pre- and post-earthworks infiltration testing on other projects on the Kāpiti Coast has verified this outcome. Beyond this I defer to the evidence of Mr Smith on geotechnical matters. I also consider that the design can be developed to maintain the hydrological inputs to the wetland.
6. While detailed earthworks design will be required at the resource consent stage, this conceptual model demonstrates that a feasible developed landform can be achieved and that the earthworks can be managed to achieve a practical cut/fill balance. On that basis, I do not consider the earthworks requirements to represent a fundamental or feasibility constraint to residential development of the site.

Stormwater

7. Based on experience with a range of projects in the Kāpiti area, I consider that low impact stormwater solutions are appropriate in the elevated parts of the site, with stormwater discharged to ground as close to source as practicable to mimic natural hydrology and ensure hydraulic neutrality.

8. In lower areas, where groundwater is shallow and infiltration may not be suitable, attenuation areas or constructed wetlands are likely to be required to achieve hydraulic neutrality and provide compensatory storage.
9. The site can also be serviced with an appropriate combination of infiltration, attenuation and stormwater treatment measures such as Enviropods & biofiltration devices. Detailed infiltration testing, groundwater monitoring and stormwater design will be required at the resource consent stage once the roading footprint, number of lots and platform elevations are known.

Flood Hazards

10. I defer to Mr Martell's evidence for a more detailed assessment of this issue and the measures that can be applied to ensure these requirements are met on the PC 5 site, including maintaining the effective functioning of the residual flow path across the site.

Transportation effects

11. In my opinion, future road design can comply with the KCDC Land Development Minimum Requirements and based on Mr Benner's evidence, the effects on the roading network from future residential development will be acceptable.

Power and Telecommunications

12. Chorus confirmed that the site falls within the Chorus UFB area and that the network can be extended to service 50 possible future lots, assuming up to three dwellings per lot. Electra confirmed that the local power network has capacity to service 50 possible future lots, assuming up to three dwellings per lot, and that the network can be extended within the site. On that basis, I consider that effects on network utilities will be acceptable.

Summary- Infrastructure and servicing

13. Overall, my opinion is that the infrastructure required to support future residential development of the site can be suitably designed and provided. I have not identified a civil engineering constraint that prevents the site from being developed for residential purposes. The outstanding engineering work principally relates to confirming the final form, sizing, timing and detailed design of the servicing and mitigation measures once the development layout and servicing demands are known.
14. I am satisfied that there is sufficient infrastructure within close proximity of the site, together with practicable upgrade and on-site mitigation options, to support future residential development. Further site-specific modelling, detailed design

and approvals will be required before subdivision development can proceed, but in my opinion, those matters do not preclude rezoning of the site.

Council evidence and submissions

15. The Council evidence caused me to refine aspects of my opinion as recorded in the Infrastructure Report, particularly in relation to the present capacity of the wider potable water network and the timing of wastewater connections. It has not caused me to alter my overall opinion that the PC5 site is capable of being serviced and developed for residential purposes, and that no additional plan provisions are needed to ensure the topics covered in my evidence are addressed at the resource consent stage.
16. I disagree with the section 42A recommendation that 100 Te Moana Road should remain in the General Rural Zone on the basis of unresolved civil engineering, stormwater or flood management feasibility (paragraphs 1.11-1.12 and 13.2-13.3 of the s42A report). I remain of the opinion that there is no civil engineering or infrastructure constraint that precludes both 100 and 110 Te Moana Road from being rezoned General Residential.
17. Since receiving Direction 4, when the panel advised I was not required to speak to wastewater and water supply matters, we received Mr Pillai's Statement of Rebuttal Evidence, so if it assists the Panel I will speak to the points raised in his latest document.
18. I noted the water capacity modelling was instructed by KCDC, despite earlier written confirmation this would not need to be progressed until the resource consent stage. Council staff have provided the brief to Ms Waterland and have not considered the possible development yield of approximately 150 dwellings in their instruction, which, had we been involved in the modelling we would have asked them to include.
19. Using Council's water meter data, I have previously completed detailed water modelling for different development typologies in the Kāpiti Coast. Based on these water meter readings, I have determined that medium density dwellings, as the case would likely be in a 150-dwelling scenario, use significantly less water than conventional larger dwellings. It is evident therefore that the built typology needs to be understood before an accurate assessment of the network impact can be determined. This is why I had anticipated that the modelling would be completed at the Resource Consent stage.
20. I agree with Mr Pillai at paragraph 8 of his rebuttal evidence that the current modelling does not mean that a development of 150 dwellings is unserviceable, and that further assessment should be completed at the RC stage. This rebuttal point does not alter my overall conclusion.

21. I agree with Mr Pillai at paragraph 9 that the absence of a modelled existing scenario excluding PPC5 does not alter the finding from the cumulative-demand assessment. The intent of my commentary was to demonstrate that the network upgrades recommended to service the PC5 site may have already been triggered by existing consented development that was included in the modelling. This rebuttal point does not alter my overall conclusion.
22. At paragraph 10 of his rebuttal evidence, Mr Pillai assumes my opinion regarding the DMA boundary valve was reached following my reading of his evidence. Whilst true in part, this was also based on discussions I had in person with Mr Hemraj Kunwar. Ultimately, I agree with Mr Pillai's position that capacity depends on the delivery of wider upgrades, which is why it is appropriate to complete the modelling at the RC stage, when the network upgrades completed at that point are known, as well as the form of development. This rebuttal point does not alter my overall conclusion.
23. At paragraph 11, Mr Pillai states that the figures quoted in my evidence relating to funding allocations for water upgrades are from the Water Services Delivery Plan, not the Long-Term Plan. I can confirm again that the figures used were taken from pages 144 and 145 of the Long-Term Plan 2024-34 however I would like to note one correction, due to a mathematical error when preparing my evidence, the total allocated in the LTP is actually \$44,214,000, not \$39,713,000 as noted in my evidence. This further supports my position that there is significant funding set aside for network upgrades in the area, which are based on future growth projections, not on a development-by-development basis. As above I agree with Mr Pillai that it is appropriate to complete the water demand modelling at the RC stage and his rebuttal point does not alter my overall conclusion.
24. At paragraph 12, Mr Pillai agrees with my evidence that the development site is included within the Development Contribution catchment maps. Irrespective of the anticipated 70 dwellings anticipated in the Zone Management Plan, the reason I included the map in my evidence was to give the Panel confidence that this site is included in the area which the Development Contributions were intended to fund, and not some far-fetched, out of town area that has not been anticipated when considering future development on the Kāpiti Coast. This rebuttal point does not alter my overall conclusion.
25. I agree with Mr Pillai's conclusion that the absence of modelling on the 150-dwelling scenario does not make rezoning infeasible. I further agree with Mr Pillai that further modelling is appropriate at the Resource consent stage, and that the extent of network upgrades completed at that point will determine what further upgrades will be required in order to service the site.

26. I understand that all of the 'interdisciplinary' matters covered at paragraphs 68-88 of my evidence are now agreed following expert conferencing with Mr Oakley (as confirmed in the Stormwater and Flood Hazard JWS).
27. I have given a detailed response to the matters covered in the submission by the Fairway Oaks Drive Residents Partnership, and defer to that for this hearing.

Nicholas Hilton Taylor

21 September 2026