

Proposed (Private) Plan Change 5 – 100 and 110 Te Moana Road, Waikanae

To rezone the application site (of approximately 5.5 ha) from General Rural Zone to General Residential Zone.

Summary of Decisions Requested by Submissions

20 February 2026

Guide to Submission Summary

The following format is used to summarise submissions on Proposed Plan Change 5:

Submission Point	Topic / Provision	Support/Oppose/Seek Amendment	Decision Requested	Reasons
Submission X:				
S1.1				

The submissions are ordered by submission number. Each decision requested by a submitter is listed as a submission point (SX.X).

Making a further submission

Clause 8 of Schedule 1 of the Resource Management Act 1991 (RMA) outlines the persons that may make a further submission, being:

- a) any person representing a relevant aspect of the public interest; and
- b) any person that has an interest in the proposed plan greater than the interest that the general public has; and
- c) the local authority itself (the Kapiti Coast District Council).

A further submission must be limited to a matter in support of or in opposition to the relevant submission made. All submissions received are summarised in this document, however, reference should also be made to the original submissions to view the full submission content and reasons for the submissions. The original submissions can be found on the Plan Change 5 webpage: [Proposed Plan Change 5 \(Private\) – 100 and 110 Te Moana Road, Waikanae - Kāpiti Coast District Council](#).

Further submissions should be made in writing, in the prescribed form - Form 6 of the Resource Management Act (Forms, Fees, and Procedure) Regulations 2003. Copies of Form 6 are available from:

- Online:
 - The Plan Change 5 webpage: [Proposed Plan Change 5 \(Private\) – 100 and 110 Te Moana Road, Waikanae - Kāpiti Coast District Council](#)
 - The Resource Management (Forms, Fees, and Procedure) Regulations 2003: <https://www.legislation.govt.nz/regulation/public/2003/0153/latest/DLM195863.html#DLM195863>
- Kapiti Coast District Council Civic Centre, 175 Rimu Road, Paraparaumu.
- Waikanae Library, 9 Mahara Place, Waikanae.

Further submissions may be lodged by no later than **6 March 2026** in the following ways:

Email: District.Planning@kapiticoast.govt.nz

Post: Plan Change 5 – Attn: District Planning Team
 Kapiti Coast District Council
 175 Rimu Road
 Private Bag 60601
 Paraparaumu 5254

In person: Kapiti Coast District Council
 175 Rimu Road
 Paraparaumu

Please Note: A person who makes a further submission is required by Clause 8A of Schedule 1 of the Resource Management Act 1991 (RMA) to also serve a copy of the further submission on the person who made the relevant original submission, **no later than 5 working days** after the date on which the further submission was provided to the Kapiti Coast District Council.

The address for service for submitters is as follows:

Submitter No.	Submitter Name	Address for Service
S.1	Jillian Bond, Bernadette Doolan, Martin Manning, Anthony George; Vanessa Moore and Michael Moore All submitting on behalf of the 'Fairway Oaks Drive Residents' Partnership'.	Jill Bond Email: jill.bond@nzkindergarten.org.nz
S.2	NZ Transport Agency Waka Kotahi	Attention: Charlotte Niederer NZ Transport Agency Waka Kotahi, Christchurch, Level 1, BNZ Centre, 120 Hereford Street, PO Box 1479 Christchurch 8022 Email: EnvironmentalPlanning@nzta.govt.nz & Charlotte.Niederer@nzta.govt.nz
S.3	QEII National Trust	Abby Jones, Solicitor Level 4, 138 The Terrace, Wellington Email: ajones@qeii.org.nz

Contents

Submission 1: Jillian Bond, Bernadette Doolan, Martin Manning, Anthony George; Vanessa Moore, and Michael Moore - All submitting on behalf of the Fairway Oaks Drive Residents' Partnership.	5
Submission 2: NZ Transport Agency Waka Kotahi	15
Submission 3: QE II National Trust	17

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
Submission 1: Jillian Bond, Bernadette Doolan, Martin Manning, Anthony George; Vanessa Moore, and Michael Moore - All submitting on behalf of the Fairway Oaks Drive Residents' Partnership.				
S1.1	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	This site is ecologically sensitive, flood-prone, and strategically designated as a rural buffer. It functions as an integral part of the Te Moana floodway and wetland corridor, providing essential hydrological storage, ecological connectivity, and cultural landscape values. Please see the original submission for full details.
S1.2	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	Previous rezoning attempts via Plan Change 2 (PC2) in 2022/23 and the Long-Term Plan (2024) were rejected due to unresolved flood hazards, lack of servicing capacity, and misalignment with strategic growth planning. Those constraints not only remain but have intensified due to increased climate risk, ecological degradation, and infrastructure pressures. Please see the original submission for full details.
S1.3	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	The Earth Science New Zealand (ESNZ) Nationwide Flood Exposure and Climate Risk Assessment (October 2025) reinforce the local hydrological case set out in this submission that the 100-110 Te Moana Road site functions as a critical flood-storage and conveyance zone and confirms that rezoning flood-prone land now would be scientifically unsound and strategically indefensible. Please see the original submission for full details.
S1.4	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	Previous rezoning attempts and reasons for failure: (a) The landowner lodged a submission on PC2 to rezone the site, arguing alignment with the NPS-UD. Council did not rezone the site via PC2. The site failed the 'intensify where it's already urban and safe to do so' test that framed PC2 – (Please see submission for full reasoning and a link to the PC2 submission seeking the site to be rezoned). (b) The landowner made a submission on the 2024-34 Long-Term Plan (LTP), requesting Council to include 100-110 Te Moana Road in Waikanae's Service Area provisions. Council did not make this change in the adopted LTP. The adopted LTP and its submissions summary do not extend service-area infrastructure to this rural, hazard-mapped block. This is consistent with KCDC's growth strategy (Te Tupu Pai - grow within existing centres and planned greenfields) and the Housing and Business Development Capacity Assessment (HBA) evidence that the district already has ample zoned capacity. (c) Both attempts ran up against the same fundamentals, being its location outside the planned urban form and service footprint, flood hazards, and KCDC's strategic documents that prioritise capacity within existing centres and identified growth areas rather than ad hoc rural rezoning with high hazard and infrastructure risk. Please see the original submission for full details.
S1.5	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	No material change in circumstances and a worsening risk profile since the previous rezoning attempts: (a) The fundamental planning, environmental, and infrastructure constraints that led to the failure of earlier rezoning attempts at 100-110 Te Moana Road remain firmly in place. In fact, the situation has

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>deteriorated, meaning the case for rezoning is now weaker than it was during the previous attempts.</p> <p>Flooding:</p> <p>(b) When KCDC considered rezoning during PC2 (2022/23), and again through the 2024-34 Long Term Plan, it found the site was flood-prone, outside the urban service boundary, and inconsistent with the district’s growth strategy. None of those constraints have been resolved. The land remains mapped with 1% Annual Exceedance Probability (AEP) flood hazard overlays, including stream corridor, ponding, residual ponding, and overflow, and it still functions as an integral part of the Te Moana floodway, which the M2PP Expressway hydrology design relies upon to manage Waikanae River overflows. No new flood protection infrastructure or verified mitigation measures have been delivered in the intervening years.</p> <p>(c) The hazard profile has intensified. Since 2022, flood modelling and national climate projections have shown an increased frequency and intensity of extreme rainfall events, which raise the probability of overland flow and flood storage failure in areas like Te Moana Road.</p> <p>(d) At the same time, tidal groundwater influence inland of the Expressway has been confirmed through monitoring by GWRC, increasing the compound risk of surface flooding during high tide and storm events. What was already high hazard land in 2022, is now facing greater climate exposure, not less.</p> <p>Infrastructure:</p> <p>(e) Waikanae’s core networks are under more pressure now than when PC2 was considered. KCDC’s most recent infrastructure reporting notes limited capacity in water, wastewater, and stormwater systems and highlights the cost of retrofitting network upgrades in flood-prone areas. No service extension has been committed through the LTP or capital works programme, and stormwater management issues in Waikanae have only become more acute with intensification elsewhere.</p> <p>Environmental conditions:</p> <p>(f) Environmental conditions have also worsened. Since the earlier applications, the wetland buffer has been physically breached through vegetation clearance along the lagoon edge at 100-110 Te Moana Road, directly contravening the Resource Management (National Environmental Standards for Freshwater) Regulations 2020. These actions have increased ecological vulnerability and further reduced the resilience of the site’s wetland systems.</p> <p>(g) The lagoon remains a functioning wetland and swan nesting area, but its ecological health is now more precarious.</p> <p>Strategically, nothing has shifted to support rezoning. The KCDC Te Tupu Pai – Growing Well Strategy remains in force, and the Housing and Business Development Capacity Assessment continues to confirm a large surplus of zoned residential capacity. In fact, the surplus has increased as planned growth areas are now being developed, and intensification provisions have taken effect. This means there is even less justification to rezone flood-prone rural land now than there was in 2022 or 2024.</p> <p>Please see the original submission for full details.</p>
S1.6	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Ecological and Biodiversity Concerns:</p> <p>(a) This landscape performs an important ecological function. It is part of a living corridor that connects</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>native vegetation, birdlife habitats, hydrological systems, and wetland areas that sustain the wider Waikanae environment.</p> <p>(b) Rezoning this land would bring vegetation clearance, compaction of soils, hydrological disruption, and a dramatic increase in impervious surfaces. These changes are proven to fragment habitat, degrade waterways, and push native species toward local collapse.</p> <p>(c) There has been no transparent, publicly available ecological impact assessment. Making a rezoning decision in the absence of baseline ecological evidence is contrary to the precautionary principle, and to both the Neighbourhood Parks and Open Spaces (NPS) Industrial Business (IB) and the RMA sustainable management purpose.</p> <p>(d) There is clear local precedent on the Kapiti Coast where Council has recognised the critical ecological function of connected landscapes and acted to protect them.</p> <p>(e) During Plan Change 79 (Ngarara Zone), Council required comprehensive ecological evidence and iwi engagement before rezoning was considered. As a result, large areas were retained in ecological corridors, consistent with the RMA's sustainable management purpose.</p> <p>(f) In the Waikanae North Wetlands case, rezoning was not approved in the absence of transparent ecological impact assessment, with Council applying the precautionary principle to protect hydrological and habitat connectivity.</p> <p>(g) PC5 proposes rezoning land that performs the same ecological function as part of a living corridor connecting native vegetation, bird habitats, hydrological systems, and wetlands. Making this decision without baseline ecological evidence would be inconsistent with these local precedents and contrary to the RMA's sustainable management purpose.</p> <p>Please see the original submission for full details.</p>
S1.7	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Documented environmental degradation:</p> <p>(a) Over the past decade, residents have witnessed and documented steady ecological decline in this area. Vegetation cover has reduced. Wetland features have been altered. Birdlife, including kererū, tūi, pīwakawaka, and riroriro have noticeably diminished. The chorus of native birds that once characterised this part of Waikanae has grown quieter year after year.</p> <p>(b) This local knowledge aligns with ecological science - incremental loss of habitat leads to cumulative and often irreversible decline. PC5 would accelerate that decline beyond repair.</p> <p>(c) In the case of Plan Change 79 (Ngarara Dunes), KCDC intervened with strong ecological assessment and corridor protection, and ecological function was sustained. In contrast, incremental rezoning and subdivision on the Paraparaumu–Waikanae urban edge proceeded without similar safeguards, resulting in long-term ecological loss.</p> <p>PC5, as currently proposed, would accelerate this decline beyond repair, repeating a pattern KCDC has already acknowledged in its own planning history.</p>
S1.8	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Tangata whenua, iwi values and kaitiakitanga:</p> <p>(a) The proposal has advanced without meaningful engagement with mana whenua, including Te Ātiawa ki Whakarongotai and Ngāti Raukawa ki te Tonga.</p> <p>(b) Tangata whenua are Treaty partners, not optional consultees. This whenua carries cultural and</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>historical significance, and ecological degradation directly undermines mahinga kai, taonga species, and kaitiakitanga.</p> <p>(c) Other plan changes have demonstrated that authentic iwi involvement leads to better ecological and cultural outcomes. PC5 falls well short of those expectations and of the Council's Treaty commitments.</p> <p>(d) A local precedent already exists on the Kapiti Coast that demonstrates the tangible benefits of authentic iwi involvement. The Waikanae River Environmental Strategy, developed in partnership with Te Ātiawa ki Whakarongotai, GWRC, and KCDC led to measurable improvements in ecological health, flood resilience, and cultural heritage protection.</p>
S1.9	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Rural amenity and character:</p> <p>(a) The Te Moana landscape retains a distinctive rural character - open, low-density, green edges. Rezoning this land to General Residential would permanently erase that character.</p> <p>(b) Urbanisation brings intensified traffic, noise, lighting, and building mass. The rural-urban threshold, once crossed, cannot be restored. This change would diminish the sense of place valued by residents and tangata whenua alike.</p> <p>(c) The Waikanae North (PC79) and Waikanae East subdivisions provide clear evidence of how urbanisation permanently alters rural landscapes - increasing traffic, lighting, noise, and building intensity, while erasing sense of place.</p> <p>(d) These changes are not theoretical. They are documented and experienced by Waikanae residents and tangata whenua. Repeating this pattern at Te Moana Road would accelerate the same irreversible urbanisation and ecological fragmentation that has already occurred elsewhere in Waikanae.</p>
S1.10	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Infrastructure and servicing pressures:</p> <p>(a) No clear evidence has been presented showing that water supply, wastewater, stormwater, and roading networks can support additional residential development here without environmental degradation or cost transfer to ratepayers.</p> <p>(b) Runoff from new impervious surfaces would flow directly into sensitive wetland and stream systems, further compounding existing ecological and hydrological stress.</p> <p>(c) Infrastructure pressures are not theoretical in Waikanae - they are well documented in KCDC's own infrastructure strategies and past planning decisions, such as PC79 (Waikanae North).</p> <p>(d) KCDC infrastructure reports have consistently noted that Waikanae's water, wastewater, stormwater, and transport systems are at or near capacity, particularly in wet-weather events. Additional rezoning in the Te Moana landscape risks further burdening these systems, leading to environmental degradation and cost transfer to ratepayers.</p> <p>(e) No transparent, publicly available evidence has been provided showing that network capacity exists to support additional residential development here.</p> <p>Please see the original submission for full details.</p>
S1.11	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Strategic growth and planning integrity</p> <p>(a) The Council's own capacity assessments show that Kapiti already has surplus residential capacity</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>for the next three decades. There is no strategic planning justification for rezoning rural land at Te Moana Road.</p> <p>(b) According to the KCDC’s Housing and Business Development Capacity Assessment, the District already has sufficient realisable residential capacity to meet forecast demand for the next 30 years with a surplus of approximately 18,785 dwellings.</p> <p>(c) The growth strategy ‘Te Tupu Pai – Growing Well’ explicitly directs growth to compact urban centres and a limited number of well-serviced greenfield growth areas, emphasising efficient servicing and consolidation of the urban form. Rezoning rural land at Te Moana Road falls outside the growth strategy’s identified urban containment and planned growth zones. It would undermine the strategy’s objectives by enabling development in an area not identified for expansion, thereby increasing the cost and inefficiency of infrastructure provision and weakening the city-shape outcomes that the Council has adopted.</p> <p>(d) There is no strategic planning justification for rezoning this rural land when the Council’s own documents show that the capacity and servicing efficiency criteria are already met within existing and planned urban zones.</p> <p>(e) This proposal undermines planned growth areas, weakens urban containment, and leads to inefficient and unsustainable infrastructure provision. It directly contradicts the Council’s own growth strategy.</p>
S1.12	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Flood hazard and hydrological risks:</p> <p>(a) Parts of the site remain mapped as 1% AEP 100-year flood hazard land, including overlays for stream corridor, ponding, residual ponding, and residual overflow. These overlays are not arbitrary; they reflect the land’s natural hydrological function as part of the wider Waikanae floodplain.</p> <p>(b) Developing on this land would mean mass earthworks, floodplain re-contouring, and engineered drainage systems that would disrupt existing flow paths, increase flood risk downstream, and potentially displace floodwaters onto neighbouring properties.</p> <p>(c) In at least one recent consent application in Waikanae, the applicant acknowledged that the site was ‘shown on the Council’s flood hazard maps as being subject to stream corridor, ponding and storage flood hazards’. These acknowledgements demonstrate that the hazard is real, mapped, and significant.</p> <p>(d) Rezoning land with these overlays to residential, without demonstrating how flood pathways, runoff, compaction, and impervious surfaces will be managed, would be inconsistent with the recognition of those hazards and the precautionary approach embedded in the Council’s own flood-plain management processes.</p> <p>(e) It is inconsistent and irresponsible to consider residential zoning on land the Council’s own maps acknowledge will flood in a 100-year event, and more frequently in current and expected future climate scenarios. These are known, modelled, mapped hazards.</p>
S.1.13	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Escalating flood risk under climate change – national evidence reinforcing local hazards:</p> <p>(a) Recent national research released by Earth Sciences New Zealand (ESNZ, October 2025) confirms that the flood hazard risks facing Aotearoa New Zealand are intensifying at a pace far beyond that reflected in current district plan modelling.</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>(b) The five-year ESNZ study, “Nationwide Flood Exposure and Climate Risk Assessment,” found that more than 750,000 New Zealanders currently live in flood-prone areas, and that exposure will rise to over 900,000 people under a +3°C warming scenario.</p> <p>(c) The report estimates NZ \$235 billion of existing built assets are at risk from rainfall-driven flooding increasing to NZ \$288 billion under projected climate change conditions. These figures were corroborated in companion coverage by 1 News (30 October 2025) and Scoop (31 October 2025), which highlight that intensifying rainfall and shorter, more extreme storm bursts are already producing greater overland-flow and groundwater-rise hazards across low-lying coastal districts.</p> <p>(d) This national scientific evidence reinforces the local hydrological findings already set out in this submission: the 100-110 Te Moana Road site is not only mapped as 1% AEP floodplain but functions as an active flood-storage and conveyance zone within the Te Moana floodway.</p> <p>(e) The ESNZ analysis demonstrates that what has historically been classified as a “one-in-100-year” event may, within coming decades, become a far more frequent occurrence. In that context, any proposal to urbanise land that already performs a protective hydrological function is strategically reckless and scientifically indefensible.</p> <p>(f) The ESNZ data provide clear national corroboration for the position advanced here - climate change is converting residual and “low-probability” hazards into regular, high-consequence events. Approving rezoning in such an area would directly contradict both the precautionary principle and the intent of Objective 5 of the New Zealand Coastal Policy Statement 2010, which directs new development away from hazard-prone areas. It would also expose ratepayers and future residents to escalating financial and safety risks that are now well quantified in national climate risk evidence.</p> <p>Please see the submission for additional reasons.</p>
S1.14	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Flood Hazard, Hydrology, and Groundwater Dynamics:</p> <p>(a) A critical flaw in the proposed plan change is its failure to differentiate between the hydrological and flood risk characteristics of the so-called “Stage 1” and “Stage 2” areas of the 100 -110 Te Moana Road site. Stage 2 in particular sits on well-defined flood risk land that has been recognised in long-term planning by KCDC including during the development of the M2PP Expressway.</p> <p>(b) That planning explicitly acknowledged the increasing vulnerability of this low-lying land to flooding under climate change scenarios (see submission for a link to a GIS map viewer). Despite this, Option 4 of the PC5 proposes rezoning the entire site to General Residential, ignoring the hydrological reality that Stage 2 acts as a critical flood storage and conveyance zone.</p> <p>(c) The technical basis for groundwater assessment at the site is also inadequate. The PC5 documentation references hand auger tools and piezometers to determine groundwater levels. These methods are not sufficiently robust for a flood-sensitive site. More advanced techniques, such as Time Domain Reflectometry (TDR), are now standard for accurately characterising soil moisture profiles and groundwater dynamics in vulnerable coastal environments.</p> <p>(d) Observations from residents and surface water ponding after relatively minor rainfall events corroborate the technical evidence - the low-lying north-western corner regularly floods, indicating near-surface saturation.</p> <p>(e) This persistent surface water presence underscores the site’s role as a functional floodplain reservoir, not merely a low-lying area (please see submission for a link to a KCDC GIS map viewer</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				and a NZTA/EPA webpage for the M2PP expressway technical reports). Please see the original submission for details.
S1.15	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Flood conveyance function and expressway planning:</p> <ul style="list-style-type: none"> (a) Hydrological planning associated with the Expressway reinforces the strategic importance of the Te Moana floodway. Section 3.4.6 of M2PP Technical Report 22 (“Assessment of Hydrology and Stormwater Effects”) details the protected Te Moana Floodway, which is specifically designed to convey floodwaters when the Waikanae River stop bank is overtopped or breached. (b) The design deliberately relies on the 100-110 Te Moana Road lagoon system to act as a flood storage area before flows are conveyed northward. Both the expressway technical reports and the AWA “Flood Assessment and Stormwater Management Concept Memo” clearly demonstrate that this site forms a critical element of Waikanae’s flood hazard management system. Any proposal to intensify land use here must acknowledge, and protect, this functional floodplain role, rather than treat it as developable real estate. (c) Moreover, the PC5 documentation’s suggestion that the M2PP Expressway has altered flood pathways in a way that removes residual ponding is inconsistent with these hydrological assessments. In reality, the expressway design accommodated, rather than eliminated, the Te Moana floodway function. It remains an essential hydrological buffer for protecting Te Moana Road and downstream properties from flood hazard.
S1.16	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Wetland and QEII site considerations:</p> <ul style="list-style-type: none"> (a) The PC5’s treatment of the wetland areas and QEII site lacks technical rigour and ecological compliance. While the plan notes that “existing ecological values within the QEII site will be retained,” it simultaneously downplays the site’s natural character and fails to demonstrate how the Resource Management (National Environmental Standards for Freshwater) Regulations 2020, 10 m setback requirement for natural inland wetlands will be met. (b) Recent vegetation clearance along the lagoon edge has already breached this legal buffer, and there are no proposed measures to restore or protect the setback. This undermines the integrity of both ecological and flood functions at the site. (c) The site’s lagoon functions as a natural wetland system with overland flow recharge. The PC5 statements, that discharge from new development will be “as close to the source as possible”, fundamentally misunderstand wetland hydrology. Wetland systems rely on gradual sub-surface flow and groundwater recharge to maintain water quality and ecological function. Altering this balance through increased impervious surfaces and engineered stormwater systems will degrade the lagoon’s ecological and flood mitigation capacity.
S1.17	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Climate change, coastal hazards, and groundwater:</p> <ul style="list-style-type: none"> (a) The flood hazard at Te Moana Road is further compounded by coastal processes and projected sea-level rise. Nearby groundwater monitoring by GWRC indicates tidal influence inland of the expressway. As shown in multiple coastal settings across New Zealand, including case studies in Dunedin, the first manifestation of sea-level rise is often a rise in inland groundwater levels,

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>amplifying surface flood risks well before coastal inundation occurs.</p> <p>(b) The Takutai Kāpiti Coastal Advisory Panel 2024 report, led by James Bolger recommends extensive groundwater monitoring in such areas to support resilient planning. Given statutory requirements under the New Zealand Building Act 2004, for structures to be sustainable for at least 50 years, any development must be assessed against a minimum sea-level rise of 300 mm (and prudently, 500 mm) over that period. The Te Moana Road site clearly does not meet that resilience threshold.</p>
S1.18	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Policy and planning implications:</p> <p>(a) The hydrological and ecological functions of the 100-110 Te Moana Road site are deeply interwoven with regional flood management, coastal hazard adaptation, and wetland protection frameworks. These factors make the site unsuitable for residential intensification.</p> <p>(b) The PC5's failure to reflect these realities is inconsistent with the New Zealand Coastal Policy Statement 2010, Objective 5 requirement to locate new development away from hazard-prone areas, and with the precautionary principle embedded in both local and national planning instruments.</p> <p>(c) Given the extensive alternative land available in Kapiti for new housing, the only technically and strategically defensible approach is to avoid rezoning this site for residential use.</p> <p>(d) PC5 is misaligned with the purpose and principles of the RMA. Section 5 requires the sustainable management of natural and physical resources. Sections 6 and 7 require protection of wetlands and indigenous biodiversity, the maintenance of amenity values, and the adoption of a precautionary approach in the face of potential environmental harm. Section 8 requires decision-makers to give effect to the principles of Te Tiriti o Waitangi. The proposed rezoning fails to meet these obligations.</p> <p>(e) It is also inconsistent with key national directions, including:</p> <ul style="list-style-type: none"> • the New Zealand Coastal Policy Statement 2010, Objective 5, which directs development away from hazard-prone areas • the National Policy Statement for Indigenous Biodiversity 2023, which requires the protection of ecological corridors and indigenous biodiversity • KCDC's own growth strategy, Te Tupu Pai – Growing Well, which provides for compact, strategically planned urban growth within identified service boundaries.
S1.19	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Financial and infrastructure risks to ratepayers/residents:</p> <p>(a) Rezoning at Te Moana Road would expose ratepayers/residents to significant long-term financial and service delivery risks. The existing water supply, wastewater, stormwater, and roading networks in Waikanae are already under strain, a fact acknowledged in KCDC infrastructure planning documents and capacity assessments. No clear, publicly available evidence has been presented demonstrating that these systems can accommodate additional residential growth in this location without extensive and costly upgrades.</p> <p>(b) Experience with previous plan changes in the district has shown that retrofitting infrastructure to cope with increased demand, particularly stormwater and wastewater networks, leads to high capital costs, which are frequently transferred to the wider community through rates. Furthermore, intensifying development on flood prone land compounds the likelihood of future flood damage and emergency response costs, creating downstream liabilities well beyond the development site itself.</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				<p>(c) An increase in the residential population in this area would also place substantial additional pressure on local amenities and community infrastructure. Roads that are already near or at capacity would face heavier traffic volumes, resulting in increased congestion, elevated maintenance requirements, and heightened road safety risks for pedestrians and cyclists.</p> <p>(d) Public open spaces and recreational areas would experience greater demand, diminishing the amenity value and accessibility of these assets for existing residents. Community facilities, including libraries, sports grounds, healthcare services, and social infrastructure would be required to absorb additional users without corresponding investment, leading to reduced service levels and quality.</p> <p>(e) These pressures are inconsistent with the Council's own growth management strategy, Te Tupu Pai – Growing Well, which prioritises development within identified urban growth areas where infrastructure and amenities can be efficiently and sustainably provided.</p> <p>(f) The cumulative effect of these pressures is likely to be a significant cost transfer to ratepayers, both through direct financial contributions to infrastructure upgrades and through a gradual reduction in the quality, accessibility, and reliability of essential services and amenities. This would erode community wellbeing and place a disproportionate burden on existing residents who receive no direct benefit from the proposed rezoning.</p> <p>(g) In line with the precautionary principle, approving rezoning in the absence of robust infrastructure evidence and strategic alignment would be an imprudent and high-risk planning decision - one that effectively shifts environmental and financial risk from the developer to the wider community.</p>
S1.20	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>OIA requests and KCDC transparency:</p> <p>(a) Official Information Act (OIA) responses obtained by the Fairway Oaks Drive Residents' Partnership, confirm that this site was not identified as a strategic growth area in Council's own planning documents. It was explicitly intended to remain a rural buffer, protecting both ecological corridors and rural amenity values.</p> <p>(b) Those same Council responses clearly stated that any future consideration of rezoning would require early iwi engagement, comprehensive ecological assessment, and infrastructure capacity testing before any change could be contemplated.</p> <p>(c) The notification of the PC5 proposal now directly contradicts these stated positions, advancing rezoning without demonstrable completion of those prerequisite steps. This raises serious questions about procedural integrity, public trust, and the consistency of Council's decision-making with its own strategic planning framework.</p>
S1.21	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>OIA requests and GWRC position:</p> <p>(a) OIA responses from Greater Wellington Regional Council (GWRC), obtained by the Fairway Oaks Drive Residents' Partnership, clearly identify the site's sensitive wetland hydrology and its critical function as a stormwater recharge and flow pathway within the Waimeha Stream catchment. These responses explicitly reference flood and inundation risks associated with any development on this land, noting that major mitigation works would be required to avoid downstream impacts. This evidence directly contradicts the simplified and minimising narrative presented in the PC5 proposal.</p> <p>(b) The contrast between the applicant's claims and GWRC's own documented technical assessments reveals a serious misalignment between development rhetoric and regulatory evidence. This raises</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
				fundamental concerns about the robustness, accuracy, and integrity of the PC5 assessment process.
S1.22	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Precedent effects and strategic risk:</p> <ul style="list-style-type: none"> (a) Approving PC5 would set a damaging precedent for ad hoc rezoning on rural and flood-prone land. This would erode the integrity of the District Plan, weaken planned growth boundaries, accelerate ecological loss, and further undermine community trust in Council processes. (b) Crucially, the Council has not cited any successful precedent of rural land rezoning in flood hazard areas within this district that has demonstrably avoided environmental, hydrological, or infrastructure impacts over time. This absence is not reassuring. It highlights the lack of a proven track record for managing such risks safely. (c) In this context, approving PC5 in the face of known and mapped hazards - flood risk, ecological connectivity, and amenity impacts - would be a strategically risky and precedent-setting decision, inconsistent with the Council's own growth strategy and infrastructure planning principles. This absence of a proven local precedent is especially concerning when viewed alongside examples from other councils, where comparable decisions to rezone rural and flood-prone land have led to significant environmental and financial consequences. (d) Across Aotearoa, cases have demonstrated that ad hoc rezoning in flood hazard areas can trigger long-term problems, including increased downstream flooding, expensive retrofitted infrastructure, ecological degradation, and legal disputes over liability. (e) These outcomes underline why the precautionary principle and strategic growth planning are embedded in modern planning frameworks. Where councils have departed from planned growth boundaries in similar circumstances, communities have borne the consequences both environmentally and financially. (f) Against that national backdrop, approving PC5 would not only expose Waikanae to similar risks but also signal a regression from established best practice in floodplain and growth management. <p>Reinforcing examples:</p> <ol style="list-style-type: none"> 1. Stop bank failure and resulting inundation of township: Edgecumbe – 2017 (please see submission for details); 2. Allowing housing in flood-exposed valleys – Cyclone Gabrielle 2023 (please see submission for details); 3. Allowing new builds in flood zones and rule tightening – Auckland flooding 2023 (please see submission for details); 4. Landslides and flooding resulting in hundreds of properties being re/yellow placarded – Nelson 2022 (please see submission for details); and 5. Repeated flooding around low-lying coastal catchments – Porirua/Plimmerton (please see submission for details).
S1.23	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Legal vulnerability:</p> <ul style="list-style-type: none"> (a) Approving PC5 would therefore create both a strategic and legal vulnerability. It would expose the Council to potential judicial review, undermine policy coherence, and weaken the credibility of the District Plan.

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
S1.24	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	Based on the statutory context, technical evidence, and planning precedent, Proposed Plan Change 5 should be declined in perpetuity. This outcome is consistent with the precautionary principle, aligns with the purpose and principles of the RMA, upholds national policy direction, protects critical hydrological and ecological functions, and preserves the integrity of the district's strategic growth framework. It also appropriately manages long-term financial and environmental risk on behalf of the community.
S1.25	Entire proposed plan change (PC5)	Oppose	Decline the proposed private plan change request in perpetuity.	<p>Key risks associated with the proposed plan change:</p> <p>Please see Appendix 1 to the submission for a table summarising the key risks associated with the proposed plan change, covering the following topics:</p> <ul style="list-style-type: none"> (a) Ecology and biodiversity (b) Hydrological and flood hazard (c) Infrastructure capacity (d) Amenity and character (e) Social infrastructure and amenities (f) Cultural and Treaty obligations (g) Strategic planning integrity (h) Financial burden on ratepayers (i) Precedent and legal risk (j) Climate resilience and risk. <p>Please see the original submission for full details.</p>
Submission 2: NZ Transport Agency Waka Kotahi				
S2.1	Entire proposed plan change (PC5)	Oppose / seek amendment	<p>Decline the proposed private plan change to the extent that the applicant has not sufficiently addressed the potential impacts of the rezoning on the MacKays to Peka Peka Expressway and associated State Highway (SH) infrastructure.</p> <p>Or, alternatively, that clarification, further assessment and/or commitment be required in accordance with matters identified / raised in the submission.</p>	<ul style="list-style-type: none"> (a) NZTA wishes the applicant to reassess the potential transport effects of the PPC on the state highway network which addresses the matters raised by NZTA. This reassessment is requested so that NZTA can properly assess the impacts of the PPC on the state highway network. (b) The subject site adjoins Te Moana Road and is located approximately 71 metres west of Te Moana Road / MacKays to Peka Peka Expressway Interchange and directly interfaces with the SH network. (c) Considers that the application does not sufficiently demonstrate that the potential adverse effects of the proposed rezoning on the SH network can be managed (avoided, remedied or mitigated) appropriately. <p>Please see the original submission for details.</p>
S2.2	Entire proposed plan change (PC5) Transport effects (traffic modelling and operational concerns)	Oppose / seek amendment	<p>That clarification, further assessment and/or commitment be provided by the applicant in relation to a reassessment of the transport effects of the proposed PPC, including:</p> <ul style="list-style-type: none"> (a) A reassessment of the transport effects of the PPC, which: <ul style="list-style-type: none"> i. includes a revision of trip generation assumptions to align with NZTA PPM 	<ul style="list-style-type: none"> (a) Considers that the applicant's transport assessment may underestimate the traffic generation associated with the developments enabled by the proposed rezoning. (b) The applicant's Transport Assessment assumes a trip generation rate of 9 vehicle movements per dwelling per day and 0.85 vehicle movements in peak hour, which equals approximately 1,350 vehicle movements per day for 150 dwellings. (c) NZTA normally calculates traffic generation from residential sites at a rate of 10.7 movements per

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
			<p>guidance and updating the SIDRA models accordingly;</p> <p>ii. provides clear justification for any reductions, confirming whether they stem from network redistribution assumptions or modelling errors; and</p> <p>iii. ensures traffic growth and distribution patterns are realistic.</p> <p>(b) An update to the SIDRA modelling to incorporate appropriate pedestrian protection phasing consistent with Wellington Transport Operations Centre (WTOC) current phasing and pedestrian priority standards to ensure accurate modelling and compliance with safety requirements.</p> <p>(c) Review and correction of signal phasing configuration to remove placeholder movements or apply variable phase settings so green time allocation reflects actual operational conditions. This needs to ensure consistency across all intersections for reliable modelling results.</p> <p>(d) Elimination of phase repetition and confirmation of minimum green times for all phases. Aligning phase frequency and placeholder movement settings with realistic operational conditions to confirm effective coordination under peak traffic.</p> <p>(e) Standardising the signal offset methodology. Applying a uniform approach to offsets (Green Start) and coordination settings across all SIDRA models to ensure consistent and accurate modelling of signal coordination and intersection efficiency.</p> <p>Please see the original submission for details.</p>	<p>hour, and when applying this rate to the subject site it indicates that there would be adverse effects on intersection performance, queuing, and safety at the interchange.</p> <p>(d) Traffic growth assumptions and modelling scenarios do not reflect realistic trip generation rates and distribution patterns.</p> <p>(e) The SIDRA modelling does not account adequately for pedestrian movements at signalised intersections. Therefore, it is considered that the modelling underestimates delay arising from pedestrian movements and does not adequately address safety requirements, making the intersections appear to perform significantly better than they would.</p> <p>(f) Raises concerns regarding signal phasing configuration, phase frequency, coordination settings and offset methodology within SIDRA models, which may affect the reliability and robustness of modelling outputs.</p> <p>Please see the original submission for details.</p>
S2.3	Entire proposed plan change (PC5) Vegetation and Designation NZTA-005	Oppose / seek amendment	<p>That clarification, further assessment and/or commitment be provided in relation to vegetation located on the subject site that is required to be retained in accordance with the conditions of Designation NZTA-005 (including conditions DC.53C–DC.58), which includes:</p> <p>(a) Further consideration of the potential implications of the PPC on the vegetation if the PPC is adopted by Council.</p> <p>(b) Confirmation of how the vegetation has been</p>	<p>(a) A portion of the subject site is subject to Designation NZTA-005 and includes areas of vegetation within and adjacent to the designation are required to be retained in accordance with the certified Site-Specific Landscape Management Plan and Planting Management Plan associated with the MacKays to Peka Peka Expressway project.</p> <p>(b) It is unclear whether the applicant is aware that there is vegetation on the subject site that is required to be retained in accordance with the conditions of Designation NZTA – 005 under the KCDP (refer to conditions DC.53C – DC.58). NZTA therefore seeks a reassessment from the applicant which takes into consideration the potential impacts of the PPC on this vegetation.</p>

Sub. Point / No.	Topic / Provision	Support / Oppose / Seek amendment	Decision Requested	Reasons
			<p>considered as part of the proposed PPC.</p> <p>(c) Clarification of what measures (if any) are proposed to retain this vegetation if the rezoning proceeds.</p> <p>(d) Confirmation that the Designation conditions will not be compromised.</p>	<p>(c) The location of the vegetation is shown in Figure 2 of the submission and is included within the Site-Specific Landscape Management Plan and Planting Management Plan for the Te Moana Road/MacKays to Peka Peka Expressway Interchange. These plans have been certified by KCDC and any changes to the identified vegetation areas will need approval from KCDC.</p> <p>Please see to the submission for more detail.</p>
Submission 3: QE II National Trust				
S3.1	Entire proposed plan change (PC5)	Neutral (conditional)	That the proposed PPC only proceed on the basis that the rezoning and any subsequent subdivision or development do not adversely affect the QEII open space covenant registered over the 0.971 ha wetland on the subject site (identified as an Ecological Site K068 under the Operative District Plan (ODP)).	<p>(a) A QEII open space covenant, registered in 1995, protects the 0.971 ha wetland on the subject property which is identified as Natural Feature (Ecological Site K068) under the ODP.</p> <p>(b) Acknowledges that the application recognises the covenant and that it applies in perpetuity.</p> <p>(c) Neutral on the proposed rezoning provided that the land use change does not negatively impact the covenant area.</p> <p>(d) Notes that future urbanisation, with the indicated housing construction plans, will bring new ecological threats to the area, along with other threats including dewatering of the wetland and pond, dewatering the wetland and adverse effects on fauna that live in the wetland.</p> <p>Please see the original submission for details.</p>
S3.2	QEII Covenant (protection, compliance, and future works)	Seek amendment / clarification	<p>That the applicant, Council, and any future parties involved in subdivision or development:</p> <p>(a) Familiarise themselves with the terms of the QEII covenant deed, in particular clause 4 of the deed, relating to activities affecting the flow, supply, quantity, or quality of the wetland or any waterbody.</p> <p>(b) Note that subdivision of the covenant area itself is prohibited without the consent of the QEII.</p> <p>(c) Contact QEII prior to undertaking any works that may directly or indirectly affect the covenant in any way.</p> <p>(d) Notify QEII of any further applications relating to the property, including subdivision applications.</p>	<p>(a) Notes that activities affecting the hydrology of the wetland may constitute a breach of covenant conditions.</p> <p>(b) Seeks assurance that covenant obligations will be recognised and upheld throughout any rezoning, subdivision, or future development processes.</p> <p>(c) Advises that it may provide more detailed submission once further subdivision plans and supporting information are available.</p> <p>Please see the original submission for details.</p>