

IN THE MATTER
of the Resource Management Act 1991

AND

IN THE MATTER
of Hearing of Submissions and Further
Submissions on Private Plan Change 5 to the
Kapiti Coast District Plan

JOINT STATEMENT OF PLANNING

EXPERTS (JWS) 30 September 2026

INTRODUCTION

1. This joint witness statement (JWS) relates to expert conferencing on the following topics, as set out in the Reply statement from Mr Williams, on behalf of the Plan Change 5 Applicants and directed by the Independent Hearing Panel via Direction 7 (dated 29 September 2026):
 - a. Conferencing between the planners and ecologists to draft revised Development Area provisions requiring and addressing:
 - Delineation of the extent of the wetland at resource consent stage
 - The specific purposes/functions for any planting within the wetland buffer
 - The criteria to be applied to determine the location, extent and type of wetland planting
 - Consideration of whether vegetation planting would have any adverse ecological consequences including for wetland hydrology
 - Maintenance of the planting in perpetuity.
2. Participants in the expert conferencing were:
 - Ms Kate Pascall (S42A reporting officer for the Council)
 - Ms Susan Jones (on behalf of the Applicant)
 - Dr Graham Ussher (Ecologist for the Applicant)
 - Mr David Pickett (Ecologist for the Council)
3. The conferencing was held online (Microsoft Teams) on 30 September 2026.
4. Updated provisions are included in Appendix 1 of this JWS.
5. We confirm that we have read the Environment Court's Code of Conduct set out in the Environment Court's Practice Note 2023. We have complied with the Code of Conduct in preparing this JWS. Except where we state that we are relying on the evidence of another person, this evidence is within our area of expertise. We have not omitted to consider material facts known to us that might alter or detract from the opinions expressed in this evidence.

6. The primary data on which the opinions are based is:

- The Operative Kapiti Coast District Plan (ODP)
- The Proposed Plan Change 5 application including all relevant appendices
- The Section 42A report and the Section 42A Addendum Report for Proposed Private Plan Change 5, including all relevant appendices
- The Statements of Evidence of:
 - Mr David Pickett, dated 20 August 2026
 - Dr Graham Ussher, dated 2 September 2026
 - Ms Jones, dated 3 September 2026
- Summary Statements and responses to questions from the Hearings Panel during the Hearing for PC5 on 21st and 22nd September 2026

MATTERS COVERED BY THIS STATEMENT

ISSUE 1:	Delineation of the extent of the wetland at resource consent stage
FACTS / ASSUMPTIONS	1. The current mapping (both in the ODP and the Applicant's mapping) of the wetland and pond is out of date due to changes to site conditions, water levels etc. There has been an increase and a decrease in extent in various locations and vegetation varies (native vs exotic). 2. There is existing NPS-FM guidance for when delineation work should take place.
AGREED POSITION	The experts agree that: • Dr Ussher and Mr Pickett agree that the delineation of the wetland extent is required at the resource consent stage. • Plan provisions should specify that the delineation should occur during the growing season. • Delineation should be undertaken by a suitably qualified and experienced ecologist and this should be specified in the plan provisions.
ISSUES REMAINING IN CONTENTION AND REASONS	No issues remain in contention

ISSUE 2:	The specific purposes/functions for any planting within the wetland buffer
FACTS / ASSUMPTIONS	1. There is uncertainty in the wetland boundary and Mr Pickett has concerns that existing vegetation/marginal wetland is not sufficiently protected. 2. Dr Ussher does not agree that the pond meets the criteria for a wetland under the NPS-FM guidance for wetland delineation. The plan provisions may therefore need to include reference to the 'pond-like feature' to ensure this is included within any planting and

	buffer requirements. A clear definition of the physical area is required.
AGREED POSITION	1. Some of the area around the wetland is already vegetated, and in these areas additional planting may be required following confirmation of the wetland edge. In other areas there is no existing planting. Where the wetland buffer extends beyond the site boundary, the plan provisions can specify that planting is only required as far as the property boundary.
ISSUES REMAINING IN CONTENTION AND REASONS	No issues remain in contention

ISSUE 3:	The criteria to be applied to determine the location, extent and type of wetland planting
FACTS / ASSUMPTIONS	• Mr Pickett considers this could refer to a document that sets out suitable wetland species, species will depend on wet vs dry areas. A planting management plan will typically set this out i.e. a map with a list of plants and their location/planting zones. • Dr Ussher noted that a typical success measure is 80% coverage with indigenous species. • Dr Ussher noted that any planting for screening/landscape amenity purposes on the fringe of the pond could impact on how the wetland and pond are used by wildlife. This will need to be addressed at the consent stage. • Dr Ussher noted that the 10 metre buffer around a wetland is typically applied as an average by councils, to allow for 'unders and overs'.
AGREED POSITION	• The type of planting should be determined by suitably qualified and experienced ecologists and landscape architects at the consent stage to ensure ecological matters are sufficiently addressed. • Plan provisions should only specify suitable wetland planting/wetland plants at this stage. • Width of buffer is agreed to be 10 metres but is typically applied as an average by Councils to allow for unders and overs. It was agreed that this does not need to be specified in the plan provisions, and Council may use its discretion in applying this to enable a consent to be implemented and workable.

ISSUES REMAINING IN CONTENTION AND REASONS	No issues remain in contention
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ISSUE 4:	Consideration of whether vegetation planting would have any adverse ecological consequences including for wetland hydrology
FACTS / ASSUMPTIONS	Refer to Issues 1-3 above
AGREED POSITION	Dr Ussher and Mr Pickett agree that this issue can be appropriately addressed at the consent stage through the application of the Greater Wellington Regional Council wetland Restoration Planting Guide for the Wellington Region. They also noted the matters in Issue 3 relating to the relationship with any planting for screening to address landscape and visual amenity matters (refer above).
ISSUES REMAINING IN CONTENTION AND REASONS	No issues remain in contention

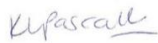
ISSUE 5:	Development Area provisions to address wetland buffer and planting requirements
FACTS / ASSUMPTIONS	Mr Pickett and Dr Ussher have agreed on the wetland buffer extent and the planting requirements within the buffer as set out above in Issues 1-4.
AGREED POSITION	Ms Jones and Ms Pascall agree that: - Policy GRZ-P29 should be amended to reflect the agreed position by Mr Pickett and Dr Ussher, including the deletion of clause 2 and replacement with a policy direction to manage potential adverse effects on K068 through the provision of a buffer, and a new clause directing the consideration of planting, and specific matters that should be addressed in considering such planting. - Subdivision Rule DEV4-R3 should include an additional standard relating to the planting requirements, should the assessment against Policy GRZ-P29 determined planting is required. This rule will also require the provision of a planting and maintenance plan to be submitted with the application. - Land use Rule DEV4-R2(2) should be amended to specify the wetland buffer is 10 metres, but this must be delineated by a

	suitably qualified and experienced ecologist at the consent stage. • The agreed provisions are set out in Appendix 1 to this JWS.
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PARTICIPANTS TO JOINT WITNESS STATEMENT

We confirm that we agree that the outcome(s) of the expert conferencing are as recorded in this statement.

30 September 2026



Kate Pascall
For Kāpiti Coast
District Council



Susan Jones
For the Applicant



Dr Graham Ussher for
the Applicant



David Pickett for Kāpiti
Coast District Council

Appendix 1 – Agreed amendments to Policy GRZ-P29

S42A report drafting is shown in red text.

Agreed amendments in expert conferencing prior to the hearing and amendments recommended in the S42A Addendum report are shown in blue text

Agreed amendments in expert conferencing are shown in green text

Amend Policy GRZ-P29

~~2. Avoid adverse effects on the ecological values and functioning of ecological site K068 through provision and maintenance of a planted buffer around the full extent of the ecological site~~

2. Manage the potential for adverse effects on the ecological values and function of ecological site K068 through the provision of a wetland buffer.

3. Consider the need for planting within all or part of the wetland buffer referred to in (2) to manage the potential for adverse effects on ecological values and function of ecological site K068, having regard to:

(a) appropriate native wetland species;

(b) the height of planting;

(c) the location and extent of planting; and

(d) how planting will be maintained

Amend DEV4-R2(2):

~~2. A 10m planted setback from the boundary of ecological site K068 must be provided, as shown in Appendix 27 DEV4-Figure 1: 100 & 110 Te Moana Road Development Area Structure Plan, and~~

2. A 10 metre wetland buffer is provided around the delineated extent of K068 as determined by a suitably qualified and experienced ecologist during the growing season for the local area and indicatively shown in DEV4-Figure 1: 100 and 110 Te Moana Road Development Area Structure Plan. For the avoidance of doubt, the pond feature is considered part of the overall wetland feature for the purposes of the 10 metre wetland buffer.

Include a new standard in DEV4-R3 – Subdivision Rule

3. Where an assessment under Policy GRZ-P29(3) determines planting is necessary within the 10 metre wetland buffer shown on DEV4-Figure 1: 100 and 110 Te Moana Road Development Area Structure Plan, a planting and maintenance plan shall be provided by a suitably qualified and experienced ecologist, with planting established prior to the issue of a certificate under section 224(c) of the Resource Management Act 1991. The planting and maintenance plan shall include:

(a) A map showing the location of planting within the wetland buffer, to include at least 80% planting coverage of the buffer area

- (b) A list of the native wetland plant species to be planted within the wetland buffer, in accordance with the Greater Wellington Regional Council *Wetland Restoration Planting Guide for the Wellington Region*
- (c) A maintenance schedule
- (d) Monitoring and reporting
- (e) Any requirements for permanent protection of planting

4. Wetland buffer planting is not required beyond the site boundary as shown in DEV4-Figure 1: 100 and 110 Te Moana Road Development Area Structure Plan.