



DATE 5 January 2023

TO SAMANTHA MAXWELL  
s 9(2)(a)

CC JESS HOLLIS  
s 9(2)(a)  
[SENT VIA EMAIL]

FROM STEPHANIE BLICK  
s 9(2)(a)  
s 9(2)(a)

Dear Samantha and Jess,

## OTAKI RACECOURSE DEVELOPMENT REFERRAL APPLICATION: REQUEST FOR FURTHER INFORMATION

### 1. INTRODUCTION

This letter responds to the requests for further information made by the Ministry for the Environment ("MfE") on the 12<sup>th</sup> of November. For completeness, responses to each of the points are provided in the following sections.

### 2. FURTHER INFORMATION

A response to each of the RFI points is provided below.

#### 2.1 NATIONAL POLICY STATEMENT FOR HIGHLY PRODUCTIVE SOILS

##### REQUEST:

1. *We understand the site is zoned Rural Production, contains LUC class 1 and 3 soils, and is not identified for future urban development or subject to a Council rezoning plan change, therefore meeting the definition of 'highly productive land' under the National Policy Statement on Highly Productive Land 2022 (NPS-HPL). Provide the following:*
  - a. *additional information, with reference to all relevant parts of clause 3.10 of the NPS-HPL, in support of your assessment that there is a long-term constraint on the land that means the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years.*
  - b. *an assessment against the objective and policies of the NPS-HPL.*

##### RESPONSE:

The NPS-HPL applies to Highly Productive Land ('HPL') that is defined as follows (my emphasis added):

*land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)*

Under Clause 3.4(1) of the NPS-HPL, every regional council must map as highly productive land any land in its region that (my emphasis added):

- (a) *Is in a general rural zone or rural production zone; and,*
- (b) *Is predominantly LUC 1, 2 or 3 land; and*
- (c) *Forms a large and geographically cohesive area.*

While the OMRC site satisfies (a) and (b) above, it does not 'form a large and geographically cohesive area' irrespective of whether the racecourse activities were present on the Site. Nor is the Site connected to a larger area given that it is largely bound by public roads.

For the purpose of identifying land referred to in Clause 3.4(1) above, clause 3.4(5) of the NPS-HPL outlines how the mapping is to occur. An assessment of the Clause 3.4(5) considerations is provided below.

- (a) *mapping based on the New Zealand Land Resource Inventory is conclusive of LUC status, unless a regional council accepts any more detailed mapping that uses the Land Use Capability classification in the New Zealand Land Resource Inventory; and*

Noted.

- (b) *where possible, the boundaries of large and geographically cohesive areas must be identified by reference to natural boundaries (such as the margins of waterbodies), or legal or non-natural boundaries (such as roads, property boundaries, and fence-lines); and*

Not applicable as the Site is not considered to be a 'large and geographically cohesive area'.

- (c) *small, discrete areas of land that are not LUC 1, 2, or 3 land, but are within a large and geographically cohesive area of LUC 1, 2, or 3 land, may be included; and*

The Site has LUC 1 and 3 land so this consideration is not applicable.

- (d) *small, discrete areas of LUC 1, 2, or 3 land need not be included if they are separated from any large and geographically cohesive area of LUC 1, 2, or 3 land.*

The Site is a small discrete area of LUC 1 and 3 land and is separated from large geographically cohesive area by roads and other natural boundaries and therefore **does not need to be included** under this clause.

Based on the above, and subject to clauses 3.4(1)(c) and 3.4(5)(d), the Site **does not fall under the definition of Highly Productive Land**.

Should the Ministry for the Environment ('MfE') disagree with the assessment that the Site is not HPL and therefore chooses to apply the NPS-HPL under Clause 3.5(7), an assessment of the Site against clause 3.10 is provided below.

## CLAUSE 3.10

Under Clause 3.10, territorial authorities may only allow HPL to be subdivided, used, or developed for activities not otherwise enabled under clauses 3.7, 3.8, and 3.9 if it is satisfied that a number of criteria are met. Refer assessment under the Clause 3.10 matters below.

- (a) *there are permanent or long-term constraints on the land that mean the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years; and*

The long-term constraint on the land that means the use of the highly productive land for land-based primary production is not able to be economically viable for at least 30 years is the fact that it is, and will continue to be, a racecourse. OMRC have further clarified that even if the Project didn't go ahead (e.g if the referral was not approved, or was declined) there is no intention to remove the racecourse and replace with land-based production activities.

- (b) *the subdivision, use, or development:*

*(i) avoids any significant loss (either individually or cumulatively) of productive capacity of highly productive land in the district; and*

This consideration refers to the significant loss of productive capacity of highly productive land *in the district* as opposed to the specific site in question. The District Plan map exert below demonstrates the Site (circled red) in relation to the vast areas of the District also zoned rural production. Given the small discrete area of the Site in relation to HPL spanning the whole district, it is considered that the proposed development will avoid 'any significant loss of productive capacity of highly productive land in the district'.

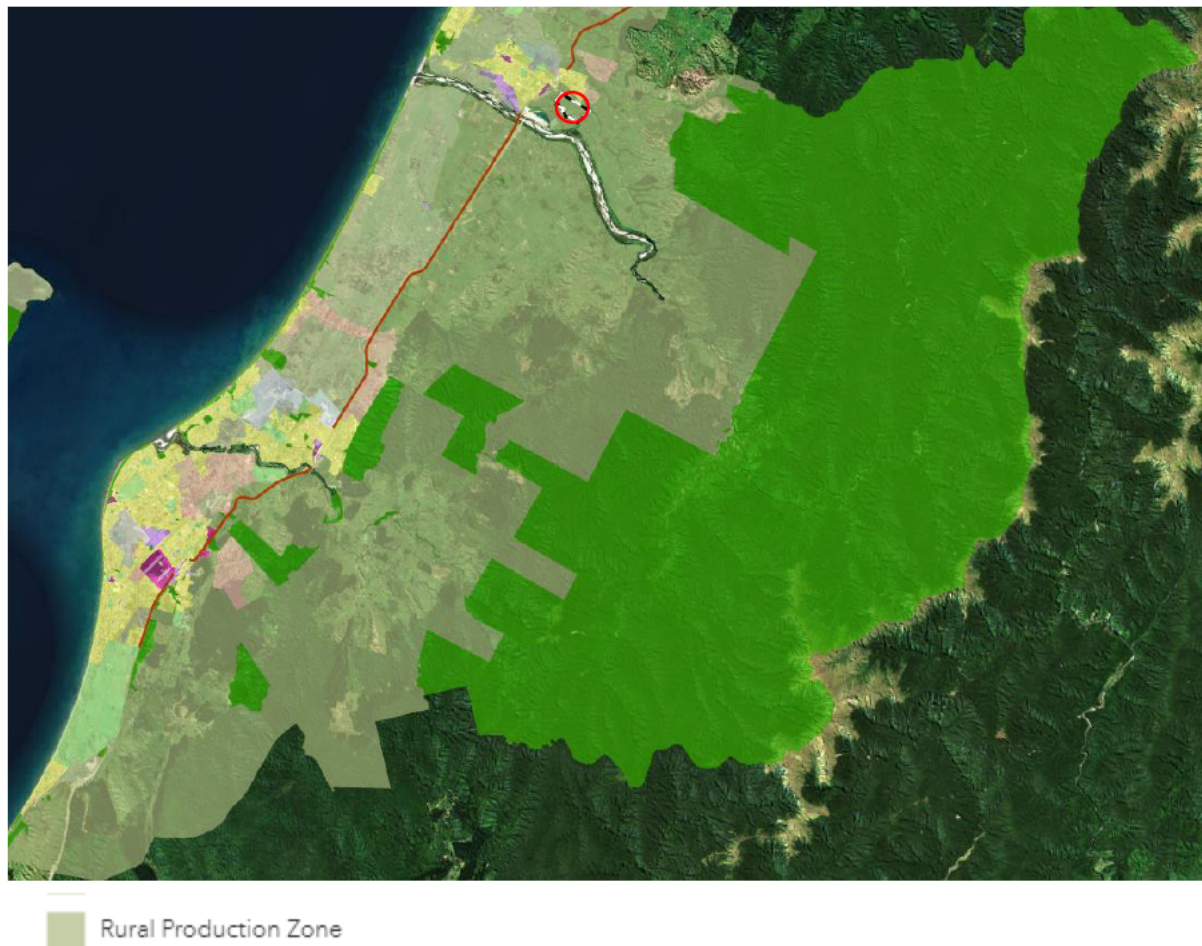


FIGURE ONE: DISTRICT PLAN RURAL PRODUCTION ZONE

*(ii) avoids the fragmentation of large and geographically cohesive areas of highly productive land; and*

This matter is not applicable as the Site is not a large and geographically cohesive area of highly productive land.

*(iii) avoids if possible, or otherwise mitigates, any potential reverse sensitivity effects on surrounding land-based primary production from the subdivision, use, or development; and*

As noted in the referral application the Project has sought to minimise potential reverse sensitivity effects through a number of design considerations including building setbacks (i.e. limiting development on the periphery of the site) and retention of a significant amount of screening and amenity trees within and bordering the site. The Site is adjacent to both rural and residential activities and potential interface effects were assessed in the *Urban Design Memorandum* which states –

- *There is a neighbouring house at the westernmost corner of the site, on Rahui Road. This, the closest to the site, is set behind its own large existing trees. The nearest proposed houses to the north are both one storey, type H1 houses. These will change the aspect from the neighbouring house. However*



subject to sensitive boundary treatment and planting, the setback and low scale of the proposed dwellings means they will have no other appreciable effects on the existing house.

- Most of the south boundary of Zone A is defined by a line of existing mature trees which will be retained. These are much taller than the tallest proposed buildings and will both allow filtered views through and partially screen new development. These trees provide an appropriate buffer to the farmland behind. There is minimal change at the southern corner of the site (Zone G and the horse training area) where apart from minor building additions and additional activity around the old totalisator building, the existing condition and use remains.
- Proposed houses will be visible from the farmland along the eastern boundary, including from the only house here which is some 400m away from the boundary. The setback of housing from the boundary in combination with existing mature trees and proposed planting at and near the boundary will ensure suitable visual integration.

Ultimately the design considerations inherent to the Project will appropriately mitigate potential reverse sensitivity effects on adjacent rural production land.

- (c) *the environmental, social, cultural and economic benefits of the subdivision, use, or development outweigh the long-term environmental, social, cultural and economic costs associated with the loss of highly productive land for land-based primary production, taking into account both tangible and intangible values*

As the Site has never been used for land-based primary production, there are no costs associated with the loss of highly productive land for land-based primary production. In other words, the benefits of the Project will far outweigh the costs as there are no costs. Therefore, a cost benefit analysis is not required to be undertaken.

Based on the assessment above, if the Site were considered HPL, territorial authorities may allow the Site to be subdivided and developed given that the relevant criteria in Clause 3.10 are satisfied.

KCDC agrees with the above assessment as outlined in the email correspondence already provided to MfE:

*Confirming Kapiti Coast District Council agrees with the applicants reasoning outlined with respect to the NPS-HPL and would support it going forward. It is unlikely Council would seek to apply NPS-HPL obligations to the OMRC Development.*

## 2.2 NPS-HPL OBJECTIVES AND POLICIES

As outlined in the section above it is considered that the Site does not fall under the definition of HPL. However, for the purposes of satisfying the information request, an assessment against the NPS-HPL objectives and policies is provided in **Table One** below.

TABLE ONE: NPS-HPL OBJECTIVES AND POLICIES	
PROVISION	COMMENT
<b>Objective:</b> Highly productive land is protected for use in land-based primary production, both now and for future generations.	The Site is not considered HPL and for the reasons outlined above and in the referral application, the development will not impact on use of HPL in the vicinity of the site for land-based primary production.
<b>Policy 1:</b> Highly productive land is recognised as a resource with finite characteristics and long-term values for land-based primary production	Refer assessment against objective above.
<b>Policy 2:</b> The identification and management of highly productive land is undertaken in an integrated way that considers the interactions with freshwater management and urban development.	Refer assessment against objective above.

TABLE ONE: NPS-HPL OBJECTIVES AND POLICIES

PROVISION	COMMENT
<b>Policy 3:</b> Highly productive land is mapped and included in regional policy statements and district plans.	Noted.
<b>Policy 4:</b> The use of highly productive land for land-based primary production is prioritised and supported.	Refer assessment against objective above.
<b>Policy 5:</b> The urban rezoning of highly productive land is avoided, except as provided in this National Policy Statement.	The Site is not HPL due to the exclusions provided in the NPS.
<b>Policy 6:</b> The rezoning and development of highly productive land as rural lifestyle is avoided, except as provided in this National Policy Statement.	The Site is not HPL due to the exclusions provided in the NPS.
<b>Policy 7:</b> The subdivision of highly productive land is avoided, except as provided in this National Policy Statement.	The Site is not HPL due to the exclusions provided in the NPS.
<b>Policy 8:</b> Highly productive land is protected from inappropriate use and development	Refer assessment against objective above.
<b>Policy 9:</b> Reverse sensitivity effects are managed so as not to constrain land-based primary production activities on highly productive land.	Refer assessment against objective above.

## 2.3 DISTRICT PLAN OBJECTIVES AND POLICIES

### REQUEST:

*For the Minister to accept a project for referral, he must be satisfied that the project will help to achieve the purpose of the FTCA under section 4, being to urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources. As the project proposes urban development within a rural zone, please provide a more detailed assessment against the objectives and policies of the Kapiti Coast District Plan.*

### RESPONSE:

A thorough assessment of the Project against the relevant objectives and policies of the District Plan is provided in **Table Two** below.

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<b>DISTRICT OBJECTIVES (included those listed in the Rural Production Chapter)</b>	
<b>DO-03 DEVELOPMENT MANAGEMENT</b> To maintain a consolidated urban form within existing urban areas and a limited number of identified growth areas which can be efficiently serviced and integrated with existing townships, delivering: <ol style="list-style-type: none"> <li>1. urban areas which maximise the efficient end use of energy and integration with infrastructure;</li> </ol>	The Site is currently zoned Rural Production but is within one of the identified growth areas in the District.  The Project is consistent with this objective for the following reasons: <ul style="list-style-type: none"> <li>• The Site is on the south-eastern edge of the Otaki Township, meaning it is already</li> </ul>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<p>2. a variety of living and working areas in a manner which reinforces the function and vitality of centres;</p> <p>3. resilient communities where development does not result in an increase in risk to life or severity of damage to property from natural hazard events;</p> <p>4. higher residential densities in locations that are close to centres and public open spaces, with good access to public transport;</p> <p>5. management of development in areas of special character or amenity so as to maintain, and where practicable, enhance those special values;</p> <p>6. sustainable natural processes including freshwater systems, areas characterised by the productive potential of the land, ecological integrity, identified landscapes and features, and other places of significant natural amenity;</p> <p>7. an adequate supply of housing and areas for business/employment to meet the needs of the District's anticipated population which is provided at a rate and in a manner that can be sustained within the finite carrying capacity of the District; and</p> <p>8. management of the location and effects of potentially incompatible land uses including any interface between such uses.</p>	<p>bounded by urban development allowing for a strong integration with the existing urban area and existing infrastructure as described in the referral application.</p> <ul style="list-style-type: none"> <li>• The development of the Site at the density proposed will contribute to a variety of housing types and living styles within Otaki and wider District.</li> <li>• The Site is within a growth area identified in KCDC's growth strategy documents and the Project will make a significant contribution to available residential capacity in the District.</li> <li>• As outlined in the Infrastructure Memorandum, the Project can be adequately serviced without resultant effects on existing capacity.</li> <li>• As outlined in the Transportation Memorandum, the Project has appropriate connections to adjacent roading network and seeks to utilise spare capacity of the old State Highway.</li> <li>• The Project includes measures to manage flood hazard risk, including the provision of stormwater detention areas.</li> <li>• The site is not located in an area of special character or amenity or an identified landscape or feature. Nonetheless, the Project has sought to maintain the rural character values of the wider locality;</li> <li>• The Project seeks to respond to housing supply issues in Otaki by providing a variety of housing typologies and tenures seeking to cater for the community and the districts growing population.</li> <li>• As further described in the Urban Design Memorandum and the Landscape Memorandum, layout and design</li> </ul>
<p><b>DO-06 RURAL PRODUCTIVITY</b></p> <p>To sustain the productive potential of land in the District, including:</p> <ol style="list-style-type: none"> <li>1. retaining land which is suitable for a range of primary production activities;</li> <li>2. achieving added economic and social value derived from primary production activities through ancillary on-site processing and marketing;</li> <li>3. enabling activities that utilise the productive potential of the land in the rural environment;</li> <li>4. reducing conflict between land uses in the rural environment and adjoining areas; and</li> </ol>	<p>While the Site is located in the Rural Production Zone, it is highly fragmented and modified and therefore not considered suitable for primary production activities. Even if the Site was deemed suitable, a racecourse has occupied the Site for over 100 years and the Site has never been utilised for rural production or other rural based activities during this time.</p> <p>With respect to potential adverse effects on primary production activities on adjacent sites, the following points are noted:</p> <ul style="list-style-type: none"> <li>• The rural land to the east of the site does not support activity likely to give rise to</li> </ul>



TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<p>5. avoiding, remedying or mitigating adverse effects on the efficient operation of existing primary production activities from sensitive activities establishing on adjoining subject sites;</p> <p>while safeguarding the life-supporting capacity of air, water, soil, and ecosystems by avoiding, remedying or mitigating adverse effects on the environment.</p>	<p>reverse sensitivity effects of any significance.</p> <ul style="list-style-type: none"> <li>• Adjacent land uses are a mix of both residential and rural activities and potential effects of the development on these properties has been appropriately addressed through the proposed masterplan. Refer assessment provided in both the <i>Landscape Memorandum</i> and the <i>Urban Design Assessment Memo</i>.</li> <li>• There is a quarry located to the south of the Site that is identified as 'Quarry – Ashford Park 2' in the District Plan. Resource consents were granted by the Council and Regional Council for the operation of a gravel quarry at 61-67 Te Roto Road, Otaki ("Ashford Park Quarry"). Upon review of the consent documentation and the Site Management Plan, it is considered that potential reverse sensitivity effects will be appropriately dealt with under existing conditions of consent. Otaki Revisited Limited will engage with the quarry operators throughout the preparation of the fast-track resource consent application.</li> </ul>
<p><b>DO-08 STRONG COMMUNITIES</b></p> <p>To support a cohesive and inclusive community where people:</p> <ol style="list-style-type: none"> <li>1. have easy access and connectivity to quality and attractive public places and local social and community services and facilities;</li> <li>2. have increased access to locally produced food, energy and other products and resources;</li> <li>3. have improved health outcomes through opportunities for active living or access to health services; and</li> <li>4. have a strong sense of safety and security in public and private spaces.</li> </ol>	<p>The Project is located in good proximity to the Otaki Town Centre as well as other recreation and education facilities.</p> <p>As a comprehensive village development, the Project includes community and commercial facilities and recreational opportunities, thereby providing for improved health outcomes, active living and for residents to provide for their wellbeing.</p> <p>The layout and clustered approach to development together with the creation of public, private and communal spaces seeks to balance the need of residents' privacy and security, with the continued operation of the racecourse together with opportunities for public access through the Site as part of potential reserve areas.</p>
<p><b>DO-011 CHARACTER AND AMENITY VALUES</b></p> <p>To maintain and enhance the unique character and amenity values of the District's distinct communities so that residents and visitors enjoy:</p> <ol style="list-style-type: none"> <li>1. relaxed, unique and distinct village identities and predominantly low-density residential areas characterised by the presence of mature vegetation, a</li> </ol>	<p>Of relevance to the Project are clauses 4) and 5). In relation to potential rural character effects the Project has sought to respect the open space and landscape values currently afforded to the Site.</p> <p>The masterplan has been designed to enable open space around dwellings, as well as providing public open spaces. Important site</p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<p>variety of built forms, the retention of landforms and unique community identities;</p> <p>2. vibrant, lively town centres supported by higher density residential and mixed use areas;</p> <p>3. neighbourhood centres, village communities and employment areas characterised by high levels of amenity, accessibility and convenience;</p> <p>4. productive rural areas, characterised by openness, natural landforms, areas and corridors of indigenous vegetation, and primary production activities; and</p> <p>5. well managed interfaces between different types of land use areas (e.g. between living, working and rural areas and between potentially conflicting land uses, so as to minimise adverse effects</p>	<p>features, including large open space vegetation areas and the racecourse track itself, are proposed to be retained and will be incorporated into the development with appropriate landscape activation and pedestrian connections.</p> <p>Key elements of the Project that seek to recognise the site's existing 'green' and rural character include:</p> <p>The location and orientation of elements within the development zones has been carefully considered to afford to recognise the Site's existing green and rural character, whereby achieving:</p> <ul style="list-style-type: none"> <li>• a high degree of community connectivity,</li> <li>• retention of the site's key defining landscape feature, the Racetrack</li> <li>• retention of the site's existing stands of Tōtara trees</li> <li>• retention of much of the existing boundary planting retention of the site's distinctive racing towers</li> <li>• retention and protection of the site's existing open water channels and streams</li> <li>• a logical and succinct network of underground services</li> <li>• siting of new dwellings within an articulated landscape that harnesses native species</li> <li>• access to public open space</li> <li>• enhancement of the site's natural character and biodiversity</li> </ul>
<p><b>DO-012 HOUSING CHOICE AND AVAILABILITY</b></p> <p>To meet diverse community needs by increasing the amount of housing that:</p> <ol style="list-style-type: none"> <li>1. is of densities, locations, types, attributes, size and tenure that meets the social and economic wellbeing needs of households in suitable urban and rural locations;</li> <li>2. is affordable and adequate for lower income households; and</li> <li>3. can respond to the changing needs of residents, regardless of age, mobility, health or lifestyle preference;</li> </ol> <p>while enhancing the amenity of living environments and contributing to the sustainability of communities and compatibility with the goals of environmental sustainability, in particular resource, water and energy efficiency.</p>	<p>The Project is inherently consistent with this objective for the following reasons:</p> <ul style="list-style-type: none"> <li>• It will providing significant housing capacity at a standard to medium density of varying typologies that will cater for a wide range of people. It seeks to provide for 628 new dwellings over the next six years. The Project will deliver significant development capacity to an area of increasing demand and increasing housing affordability issues.</li> <li>• It will enable more people to live in an urban environment which is close to a suburban centre that is continuing to undergo significant change and improvement and where, based on</li> </ul>



TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	<p>population projections and the shortfall in land supply, there is high demand for housing relative to surrounding areas or other areas of the District.</p> <p>The Project achieves the above while having a minimal impact on the amenity of surrounding properties, providing a positive internal amenity within the Site and appropriately addressing a range of environmental effects as detailed in the referral application.</p> <p>With respect to affordable housing, the <i>Economic Assessment</i> states:</p> <p><i>The dwellings are expected to be priced between \$340,000 and \$690,000 with 53% of these dwellings priced for less than \$600,000. This will reduce the affordability pressures residents of Ōtaki currently experience, with Ōtaki being one of the least affordable locations in the Kapiti Coast District.</i></p>
<p><b>DO-013 INFRASTRUCTURE</b></p> <p>To recognise the importance and national, regional and local benefits of infrastructure and ensure the efficient development, maintenance and operation of an adequate level of social and physical infrastructure and services throughout the District that:</p> <ol style="list-style-type: none"> <li>1. meets the needs of the community and the region; and</li> <li>2. builds stronger community resilience, while avoiding, remedying or mitigating adverse effects on the environment.</li> </ol>	<p>The project engineers have confirmed that the site can be adequately serviced with water supply, wastewater disposal, stormwater disposal and telecommunications. The infrastructure assessment concludes that:</p> <p><i>In summary, it is our view that the site can be developed and adequately serviced subject to further engineering design, and that this can be addressed through future consents. Further, as Kapiti Coast District Council has received the necessary funding for off-site infrastructure upgrades to support the development and has already commenced the necessary modelling and design work to advance these upgrades, there appear to be no impediments to implementing the proposed development based on the delivery programme provided with the referral application.</i></p> <p>Three waters infrastructure will be designed to Council standards. The final design will be developed in consultation with District Council to achieve an acceptable outcome with regard to the Council's District Plan and the Subdivision and Development Principles and Requirements document.</p> <p>With respect to social infrastructure, the Project includes integrating existing community activities and enabling new community and commercial activities to establish within the village. These activities will</p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	meet the needs of the development and the wider community.
<p><b>DO-014 ACCESS AND TRANSPORT</b> To ensure that the transport system in the District:</p> <ol style="list-style-type: none"> <li>1. integrates with land use and urban form and maximises accessibility;</li> <li>2. improves the efficiency of travel and maximises mode choice to enable people to act sustainably as well as improving the resilience and health of communities;</li> <li>3. contributes to a strong economy;</li> <li>4. avoids, remedies or mitigates adverse effects on land uses;</li> <li>5. does not have its function and operation unreasonably compromised by other activities;</li> <li>6. is safe, fit for purpose, cost effective and provides good connectivity for all communities; and</li> <li>7. provides for the integrated movement of people, goods and services.</li> </ol>	<p>Potential access and traffic related effects are addressed below with reference to the Traffic Assessment provided with the referral application.</p> <p>The Project has been developed with significant input and advice from Stantec. In relation to potential traffic generation effects, the Traffic Assessment makes the following comments:</p> <p><i>The Racecourse is well located in a transport sense. It is close and within walking and cycling distance to the facilities and amenities of the Otaki town centre, including the railway station, and well connected by road with the improvements afforded by the Peka Peka to Otaki Expressway.</i></p> <p><i>Traffic movements from the site will be distributed to and from Rahui Road and Te Roto Road. Both roads have available capacity to accommodate additional traffic movements of the scale likely to be generated by development of the Racecourse site in the manner proposed, and indeed as anticipated by Te Tupu Pai.</i></p> <p>Ultimately, Stantec conclude that –</p> <p><i>Te Tupu Pai presents a strategy for growth and development across the Kapiti district. Otaki is identified as a growth node, with opportunity for further development and intensification as infrastructure improvements on the rail corridor come online.</i></p> <p><i>Recent investment in the transport system in the form of the Peka Peka to Otaki Expressway is an enabler to local land development, by way of removing current constraints and traffic congestion, and providing opportunities for improved local travel. The current proposal for future housing development at Otaki Maori Racecourse will be supported well with the added capacity afforded in the network at the completion of the Expressway and the improved safety, travel and active mode facilities offered. There is no need for other infrastructure improvements (significant or otherwise) to be made.</i></p> <p><i>From a transport perspective, the effects of additional traffic activity generated by development of the land as proposed can be</i></p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	<p><i>appropriately managed without giving rise to adverse effects that cannot be appropriately avoided, remedied or mitigated.</i></p> <p><i>Furthermore, development of housing in this location will support the ability for other transport improvements to be made in the future, including investment in the rail corridor to extend commuter rail to Otaki.</i></p> <p>The adverse effects of construction traffic can be mitigated to an acceptable level through the implementation of a Construction Traffic Management Plan as proposed through a condition of resource consent.</p> <p>On the basis of the assessment provided by Stantec, the Project is consistent with this objective.</p>
<p><b>DO-015 ECONOMIC VITALITY</b> To promote sustainable and on-going economic development of the local economy, including the rural sector, with improved number and quality of jobs and investment through:</p> <ol style="list-style-type: none"> <li>1. <ol style="list-style-type: none"> <li>a. encouraging business activities in appropriate locations within the District, principally through differentiating and managing various types of business activities both on the basis of the activity, and the potential local and strategic effects of their operation;</li> <li>b. reinforcing a compact, well designed and sustainable regional form supported by an integrated transport network;</li> <li>c. enabling opportunities to make the economy more resilient and diverse;</li> <li>d. providing opportunities for the growth of a low carbon economy, including clean technology;</li> <li>e. minimising reverse sensitivity effects on business activities, including primary production activities ; and</li> <li>f. enhancing the amenity of Working Zones;</li> </ol> </li> </ol> <p>while:</p> <ol style="list-style-type: none"> <li>2. <ol style="list-style-type: none"> <li>a. ensuring that economic growth and development is able to be efficiently serviced by infrastructure;</li> <li>b. encouraging commercial consolidation and the co-location of community services and facilities primarily within the Paraparaumu Sub-Regional Centre and Town Centres; and</li> <li>c. managing contamination, pollution, odour, noise and glare, associated with business activities, including primary production activities.</li> </ol> </li> </ol>	<p>The Project is consistent with this objective for the following reasons:</p> <ul style="list-style-type: none"> <li>• The <i>Economic Assessment</i> states that the Project would create a considerable number of jobs within the construction industry, estimating that the construction of the dwellings and associated activities including the assembly operation would result in between 384-556 FTE jobs and would contribute \$51 – 74 million to GDP.</li> <li>• The commercial activities proposed for the development are commensurate with the location, scale and nature of the village development and will not adversely affect the vitality of Otaki Town Centre;</li> <li>• The proposed building manufacture activities seeks to contribute to a low carbon economy by enabling house construction 'on-location' in a streamlined and efficient manner;</li> <li>• The proposed commercial activities will not adversely affect adjacent rural activities;</li> <li>• As further outlined in the referral application, the development can be appropriately serviced via existing infrastructure as well as new and upgraded infrastructure that will be funded through the IAF;</li> <li>• The proposed community activities are complementary and enhance existing activities already occurring on the Site and to make efficient use of the existing racecourse buildings.</li> </ul>



TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	<ul style="list-style-type: none"> <li>The proposed community and commercial activities will not result in adverse contamination, pollution, odour, noise or glare effects.</li> </ul>
<p><b>DO-017 STRIVING COMMUNITIES</b> To have a rich and diverse network of open space areas that:</p> <ol style="list-style-type: none"> <li>is developed, used and maintained in a manner that does not give rise to significant adverse effects on the natural and physical environment;</li> <li>protects the District's cultural, ecological and amenity values, while allowing for the enhancement of the quality of open space areas;</li> <li>supports the identity, health, cohesion and resilience of the District's communities; and</li> <li>ensures that the present and future recreational and open space needs of the District are met.</li> </ol>	<p>Recognising the site's existing 'green' and rural character, the Project develops a comprehensive open space network within the village that is a mixture of private and shared open space.</p> <p>The proposed public recreational spaces (in addition to the Racing Precinct that contains the long-established racecourse buildings and associated activities) are proposed in the form of parklets and larger park zones. These areas are located strategically to provide equitable access as well as convenient off-site access.</p> <p>As further outlined in the <i>Landscape Memorandum</i>, the public open spaces are proposed to provide opportunities for celebration of the cultural and racing history of the site and broader environs.</p> <p>Open space is also provided in a passive sense through larger areas of open space being retained (including the racecourse itself), retention of shelterbelt and mature trees, and planting across the wider site.</p> <p>The <i>Landscape Memorandum</i> also concludes that the village development can be sensitively integrated into the existing rural racecourse landscape, ensuring potential landscape character and visual effects can be adequately avoided, remedied, or mitigated and that '<i>visual and landscape effects will not be significant</i>'.</p> <p>In summary, the Project will meet the open space needs of future residents and identifies ways in which the wider Project can contribute to the wider public open space network via appropriate external connections.</p>
<b>RURAL PRODUCTION CHAPTER</b>	
<p><b>RPROZ-P1 RURAL PRODUCTION</b> Primary production activities will be provided for as the principal use in the District's Rural Zones where adverse effects on the environment are avoided, remedied or mitigated and the life-supporting capacity of air, water, soil and ecosystems is safeguarded.</p>	<p>While the Site is in the Rural Production Zone of the Operative District Plan, it is highly fragmented and modified, and, most importantly, it has operated as a racecourse for over 100 years and has never been utilised for rural production or other rural based activities during this time.</p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	<p>The long-established racecourse activities on the Site represents a long-term constraint on the land that would mean that use of the small balance areas of the Site for primary production activities would not be viable.</p> <p>While this policy recognises primary production activities as the <i>principal use</i> in the zone, the broader policy framework does not seek to avoid or discourage other activities that may be appropriate. Refer assessment against other relevant policies below.</p>
<p><b>RPROZ-P2 RURAL CHARACTER</b></p> <p>Subdivision, use and development in the Rural Zones will be undertaken in a manner that maintains or enhances the District's rural character, including:</p> <ol style="list-style-type: none"> <li>1. the general sense of openness;</li> <li>2. natural landforms;</li> <li>3. overall low density of development; and</li> <li>4. the predominance of primary production activities.</li> </ol>	<p>While the Site is not rural in function, the project landscape architects acknowledge that the Site has a sense of openness and character that contributes to the wider environment.</p> <p>Key elements of the Project that seek to maintain the Site's existing 'green' and rural character include:</p> <ul style="list-style-type: none"> <li>• the clustering of development in strategic locations (including being far-removed from adjacent rural properties) so as to avoid an over-intensification of the Site;</li> <li>• Retention of extensive planting and mature trees within and bordering the Site;</li> <li>• A visually cohesive language of native planting;</li> <li>• 'soft' edges to paved surfaces,</li> <li>• Low level fencing, strategically located privacy screens/fences, and</li> <li>• Water sensitive urban design elements (rain gardens, planted swales, on site water detention and restorative planting to existing water channels).</li> </ul> <p>The <i>Landscape Memorandum</i> concludes that:</p> <p><i>The large green paddock zone denoted by the racetrack will continue to be the dominant landscape feature on site by virtue of its sheer scale and slightly elevated condition in relation to the proposed development areas. That said, the proposed development will visually and physically transform portions of the site, namely the northwest, northeast, southwest and eastern sectors. Whilst some sections of the development will be visible from the surrounding public streets and neighbouring</i></p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	<p><i>properties, the retention of existing boundary planting will provide a level of visual screening.</i></p> <p><i>The location and orientation of elements within the development zones has been carefully considered to afford:</i></p> <ul style="list-style-type: none"> <li><i>• a high degree of community connectivity,</i></li> <li><i>• retention of the site's key defining landscape feature, the Racetrack</i></li> <li><i>• retention of the site's existing stands of Tōtara trees</i></li> <li><i>• retention of much of the existing boundary planting retention of the site's distinctive racing towers</i></li> <li><i>• retention and protection of the site's existing open water channels and streams</i></li> <li><i>• a logical and succinct network of underground services</i></li> <li><i>• siting of new dwellings within an articulated landscape that harnesses native species</i></li> <li><i>• equitable access to public open space</i></li> <li><i>• opportunities for the integration of WSUD</i></li> <li><i>• enhancement of the site's natural character and biodiversity</i></li> <li><i>• an expression of the site's cultural and racing histories</i></li> </ul> <p>The combination of the factors referred to above ensures that the interfaces of this development are appropriately managed to mitigate any potential rural character and amenity effects.</p> <p>Ultimately, the assessment finds that the village development can be sensitively integrated into the existing rural racecourse landscape, ensuring potential landscape character and visual effects can be adequately avoided, remedied, or mitigated.</p>
<p><b>RPROZ-P5 MANAGEMENT OF CONFLICTING USES</b></p> <p>Manage the interface between activities on adjoining sites in the Rural Zones in order to avoid, remedy or mitigate adverse effects on amenity values and on the effective and efficient operation of rural activities.</p>	<p>The Urban Design Assessment includes an assessment of potential impacts on adjacent properties. In summary, Mr McIndoe makes the following comments:</p>



TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
	<ul style="list-style-type: none"> <li>• <i>There is a neighbouring house at the westernmost corner of the site, on Rahui Road. This, the closest to the site, is set behind its own large existing trees. The nearest proposed houses to the north are both one storey, type H1 houses. These will change the aspect from the neighbouring house. However subject to sensitive boundary treatment and planting, the setback and low scale of the proposed dwellings means they will have no other appreciable effects on the existing house.</i></li> <li>• <i>Most of the south boundary of Zone A is defined by a line of existing mature trees which will be retained. These are much taller than the tallest proposed buildings and will both allow filtered views through and partially screen new development. These trees provide an appropriate buffer to the farmland behind. There is minimal change at the southern corner of the site (Zone G and the horse training area) where apart from minor building additions and additional activity around the old totalisator building, the existing condition and use remains.</i></li> <li>• <i>Proposed houses will be visible from the farmland along the eastern boundary, including from the only house here which is some 400m away from the boundary. The setback of housing from the boundary in combination with existing mature trees and proposed planting at and near the boundary will ensure suitable visual integration.</i></li> </ul> <p>The potential adverse reverse sensitivity effects on the adjacent quarry are assessed in the referral application where it is concluded that potential reverse sensitivity effects will be appropriately dealt with under existing conditions of the quarry consent.</p>
<b>RPROZ-P6 SENSITIVE USES</b> Ensure that new sensitive activities establishing in the Rural Zones are designed and located to avoid, remedy or mitigate potential reverse sensitivity effects on primary production activities, and other lawfully established activities.	Refer assessment under RPROZ-P5 above.
<b>RPROZ-P7 GROWTH MANAGEMENT</b> Avoid the use of land in the Rural Production Zone for urban development or rural lifestyle development where such a proposal would:	The Project supports the District's urban form by locating within an area identified to accommodate urban growth. It achieves an appropriate density across the Site and avoids any significant adverse effects through a

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<ol style="list-style-type: none"> <li>1. compromise the use and productive potential of land for primary production activities;</li> <li>2. compromise the District's ability to maintain a consolidated urban form in existing urban areas;</li> <li>3. compromise the distinctiveness of existing settlements or reduce rural character values between and around settlements;</li> <li>4. adversely affect the vitality of the District's Centre Zones;</li> <li>5. make inefficient use of the transport network; or</li> <li>6. increase pressure for public services and infrastructure (including transport and community infrastructure) beyond existing capacity.</li> </ol>	<p>comprehensive and integrated approach to the mitigation of effects.</p> <p>The Project will not:</p> <ul style="list-style-type: none"> <li>• Compromise the use and productive potential of the land or adjacent rural land for primary production activities;</li> <li>• Compromise the District's ability to maintain a consolidated urban form. The Project will achieve a positive interface with the emerging residential environment and maintain the amenity and operational functions of surrounding rural properties.</li> <li>• Compromise the distinctiveness of existing settlements or reduce rural character values. Refer assessment of rural character effects above;</li> <li>• Adversely affect the vitality of the Districts Centre Zones. The proposed community and commercial activities are of a scale and nature that will service the local community and will not detract from the vibrancy or vitality of the Otaki Town Centre.</li> <li>• Make inefficient use of the transport network. The Project provides appropriate connectivity to adjacent urban areas and beyond via the state highway upgrades.</li> <li>• Increase pressure for public services and infrastructure (including transport and community infrastructure) beyond existing capacity. The infrastructure and traffic assessments demonstrate that the Project can be effectively integrated with infrastructure planning, funding and delivery. All off-site upgrades necessary to support the proposed development have secured funding via the IAF whereby Council are already working on the necessary modelling, design and programming work to ensure the upgrades align with the delivery programme for the Project.</li> </ul>
<p><b>RPROZ-P8 RESIDENTIAL UNITS AND BUILDINGS</b></p> <p>New residential units (excluding visitor accommodation which is not temporary residential rental accommodation) and other buildings (excluding minor buildings) in all the Rural Zones will be provided in a manner which avoids, remedies or mitigates adverse environmental effects (including cumulative effects) on the productive potential and landscape character of the rural area, including:</p>	<p>Refer assessment of rural character and rural production effects above.</p> <p>The location, scale and density of residential development proposed has been carefully considered and assessed by the project team through an integrated and comprehensive masterplanning process.</p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<ol style="list-style-type: none"> <li>1. limiting the number of residential units and minor residential units to one of each per subject site, except where Development Incentive Guidelines are complied with;</li> <li>2. managing the location and scale of buildings (excluding minor buildings); and</li> <li>3. recognising the operational requirements for buildings (excluding minor buildings) that are ancillary to primary production activities.</li> </ol>	<p>The level of residential development proposed is appropriate within the context of the site and surrounds given that:</p> <ol style="list-style-type: none"> <li>a. The Site is in close proximity of the site to the SH1 town centre zone and other essential service and community facilities including a supermarket, college and school.</li> <li>b. Development around the part of Ōtaki close to SH1 is currently one-sided. The town extends across SH1 to the north-east, but has yet to expand to the south-east. The racecourse site provides for that expansion, filling a gap in the quadrant of land to the south-east.</li> <li>c. The proposed residential development is well located on a major cross-axis and similarly suitably placed relative to the town centre as the existing residential area due north between Rahui and Waitohu Valley Roads.</li> </ol>
<p><b>RPROZ-P10 RURAL PLANS PRECINCT</b></p> <p>Subdivision, use and development in the Rural Plains Precinct will be undertaken in a manner which:</p> <ol style="list-style-type: none"> <li>1. Supports the primary production activity focus of the Rural Zones while protecting the openness and expansive character values of the Rural Plains Precinct;</li> <li>2. avoids loss of the life sustaining and productive potential of the land resource;</li> <li>3. allows for clustered development in appropriate areas;</li> <li>4. retains an overall low density, vegetated character and minimal level of non-rural activity;</li> <li>5. provides subject sites which are capable of accommodating a primary residential building which is not at risk from identified natural hazards; and</li> <li>6. provides for buildings ancillary to primary production activities.</li> </ol>	<p>The Site is not a 'typical' rural site in that it does not accommodate primary production activities and has accommodated a recreational / commercial activity for over 100 years. Further, as outlined in the assessments above, the Project will not adversely affect primary production activities in the vicinity of the Site.</p> <p>In addition, while residential development on a rural site is proposed, given the small and discrete nature of the site when compared with the extensive area of rural zoned land within the District, it is considered that the development will not detract from the primary production activity focus of the rural zone.</p> <p>Furthermore, for the reasons outlined in the <i>Landscape Memorandum</i> and <i>Urban Design Memorandum</i>, the Project will maintain the openness character values of the Site and surrounding locality.</p>
<p><b>URBAN AND ENVIRONMENTAL DESIGN AND INCENTIVES</b></p>	
<p><b>UED1 – P1: URBAN DESIGN</b></p> <p>Quality urban design outcomes will be promoted so that public and private places and spaces:</p> <ol style="list-style-type: none"> <li>1. are liveable and safe;</li> <li>2. enhance the local economy, environment and community;</li> <li>3. are sustainable, enduring and resilient;</li> </ol>	<p>Based on the assessments provided in the <i>Urban Design Memorandum</i>, the Project aligns with this policy.</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>• The Project is consistent with this policy as it will create a safe and liveable space</li> </ul>



TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<p>4. provide a strong sense of place reflecting cultural values and distinct community identities;</p> <p>5. are enjoyable, comfortable, welcoming and provide a diversity of experiences; and</p> <p>6. are easy to move around and through, by encouraging a well-connected and integrated transport network;</p> <p>7. at all levels of urban design, from macro (urban structure and subdivision) to micro (building details and materials) scale.</p>	<p>for residents with a high amenity value. A strong sense of place will be created through the design of the village and the environmental values of the Site will be enhanced. A highly liveable environment will result.</p> <ul style="list-style-type: none"> <li>• The Project represents a significant investment into the local economy both through the construction phase but also through the ongoing operation of the village.</li> <li>• The Site, adjacent land uses and its wider context means that it is suitable for the planned village development, being conveniently close to the centre of Ōtaki and important amenities including shops, schools and a supermarket.</li> <li>• The development achieves a comfortable fit with both its wider context and its immediate neighbours.</li> <li>• The network of local streets, lanes and walkways is fine grained, safe and attractive. This provides a choice of routes for comfortable access throughout the neighbourhood and a high degree of amenity.</li> <li>• A high amenity suite of public spaces and places provides the setting for relatively small dwellings with small, well-oriented private open spaces.</li> <li>• A combination of economy in dwelling size with generosity in public and community spaces is a valid means of making this a high amenity, attractive and affordable place to live.</li> </ul>
<p><b>UEDI- P2: SAFETY CRIME PREVENTION THROUGH ENVIRONMENTAL DESIGN</b></p> <p>Development, use and subdivision will be consistent with the Subdivision and Development Principles and Requirements 2012 and Crime Prevention through Environmental Design (CPTED) Guidelines to enhance safety and security of residents and visitors.</p>	<p>The Project is generally consistent with the Subdivision and Development Principles and Requirements 2012 and CPTED Guidelines. If referred, the fast track application will include a detailed assessment of the Project demonstrating this.</p>
<b>URBAN FORM AND DEVELOPMENT</b>	
<p><b>UFD-P1: GROWTH MANAGEMENT</b></p> <p>New urban development for residential activities will only be located within existing urban areas and identified growth areas, and will be undertaken in a manner which:</p> <ol style="list-style-type: none"> <li>1. supports the District's consolidated urban form;</li> <li>2. maintains the integrity of the urban edge north of Waikanae and Ōtaki;</li> </ol>	<p>The Project supports the District's urban form by locating within an area identified for urban development. It achieves an appropriate density across the Site and avoids any significant adverse effects through a comprehensive approach to the mitigation of effects.</p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<p>3. manages residential densities by:</p> <ol style="list-style-type: none"> <li>enabling medium density housing and focused infill housing in identified precinct areas that are close to centres, public open spaces, and public transport nodes;</li> <li>retaining a predominantly low residential density in the Residential Zones;</li> <li>avoiding any significant adverse effects of subdivision and development in special character areas identified in GRZ-P3;</li> </ol> <p>4. avoids urban expansion that would compromise the distinctiveness of existing settlements and unique character values in the rural environment between and around settlements;</p> <p>5. can be sustained within and makes efficient use of existing capacity of public services and strategic infrastructure; and</p> <p>6. promotes the efficient use of energy and water.</p>	<p>Refer assessment against Objective DO-03 – Development Management above.</p>
<p><b>UFD-P2: HOUSING CHOICE</b></p> <p>An increased mix of housing forms and types will be encouraged within parts of the District where increased variety and densities of housing are able to cater for changing demographics, while maintaining high amenity values. This will include provision for:</p> <ol style="list-style-type: none"> <li>smaller household sizes, including 1 and 2 bedroom residential units;</li> <li>housing for older persons;</li> <li>supported living accommodation;</li> <li>papakāinga;</li> <li>shared and group accommodation;</li> <li>minor residential units; and</li> <li>a range of allotment sizes and land tenure arrangements to facilitate these typologies.</li> </ol>	<p>The project will deliver a variety of homes at a range of typologies and prices (including affordable housing) to meet the needs of different households.</p>
<p><b>UFD-P3 INTENSIFICATION</b></p> <p>Residential intensification will be managed to ensure that adverse effects on local amenity and character are avoided, remedied or mitigated, including through achievement of the following principles:</p> <ol style="list-style-type: none"> <li>development will complement the existing environment in terms of retaining landforms, yard setbacks and relationship to the street and open spaces; and</li> <li>building bulk and scale will be managed.</li> </ol>	<p>The Project is consistent with the policy for the reasons outlined in the <i>Urban Design Memorandum and</i> rural character, residential character and amenity assessments included in the referral application.</p>
<p><b>UFD-P7: ACCESSIBILITY</b></p> <p>Subdivision, land use and development will be undertaken in a manner which enables all urban residences to have access to public open space within a distance of 400 metres.</p>	<p>The proposed public recreational spaces (in addition to the Racing Precinct that contains the long-established racecourse buildings and associated activities) are proposed in the form of parklets and larger park zones. These areas are located strategically to provide equitable access (within a distance of 400m) as well as convenient off-site access.</p>

TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
<b>FLOOD HAZARDS</b>	
<p><b>NH-FLOOD-P12 HIGH HAZARD FLOOD AREAS</b> Development in the river corridor, stream corridor, overflow path, and residual overflow path areas will be avoided unless the 1% AEP hazard can be mitigated on-site to avoid damage to property or harm to people, and the following criteria are met:</p> <ol style="list-style-type: none"> <li>1. no increase in flood flow or level on adjoining sites or other parts of the floodplain;</li> <li>2. no reduction in storage capacity on-site; and</li> <li>3. all flow corridors or overflow paths are kept clear to allow flood waters to flow freely at all times.</li> </ol>	<p>The GWRC flood hazards GIS map indicates that most of the site has a low flooding risk but some lower lying areas have an Annual Exceedance Probability modelled at 1%. A portion of the site is located within the Flood Hazard (Ponding) Area of the District Plan.</p> <p>Land contouring undertaken during construction of the development will ensure all surface water drains to the road and reserve corridors. Building platforms will be set at levels that will comply with the NZ Building Code and will be calculated at building consent stage.</p> <p>The Project also includes the creation of stormwater storage areas as well as minor recontouring works to existing drains and watercourses to accommodate current flood volumes within the site. These areas have been allowed for in the masterplan. The preliminary stormwater modelling undertaken to date confirms that flood volumes can be accommodated on site to ensure hydraulic neutrality is achieved and flood volumes do not increase off-site.</p>
<b>DISTRICT WIDE SUBDIVISION MATTERS</b>	
<p><b>DO-19 HOUSING BOTTOM LINES</b> To achieve sufficient development capacity as required by the National Policy Statement on Urban Development 2020 by meeting housing bottom lines of:</p> <ol style="list-style-type: none"> <li>1. 6,123 additional residential units over the short-medium term (2021 – 2031); and</li> <li>2. 10,063 additional residential units over the long term (2031-2051).</li> </ol>	<p>The proposal will add significantly to development capacity of the District given that it will account for 10% of the short-medium term housing demand.</p>
<b>EARTHWORKS</b>	
<p><b>EW-P1 EARTHWORKS</b> Earthworks activities excluding extractive industries, the removal and replacement of underground storage tanks, and earthworks defined in and regulated by the NESPF will:</p> <ol style="list-style-type: none"> <li>1. be managed to protect geological features identified in Schedule 6 from disturbance; and</li> <li>2. be sympathetically located and of a scale that protects the values of outstanding natural features and landscapes identified in Schedule 4; and</li> <li>3. avoid or mitigate erosion and off-site silt and sediment runoff to the Council's reticulated stormwater system and waterbodies; and</li> </ol>	<p>The Project is consistent with this policy. The Site does not contain any identified geological features, outstanding natural features or landscapes, and the referral application is accompanied by <i>Infrastructure Report</i> that outlines the following principles that will be further developed to manage potential effects associated with earthworks:</p> <ul style="list-style-type: none"> <li>• Minimise disturbance – Minimise the extent of earthworks as much as is practicable.</li> <li>• Stage construction – Minimise the amount of area open at one time and the</li> </ul>



TABLE TWO: DISTRICT PLAN OBJECTIVES AND POLICIES

PROVISION	COMMENT
4. be managed to ensure adverse effects on natural landforms, residential amenity values and rural character values are remedied or mitigated.	<p>time that these areas are left un-stabilised.</p> <ul style="list-style-type: none"> <li>• Protect receiving environments – Apply additional protection (e.g. silt fences) and work methodologies around sensitive receiving environments (near stream corridors etc).</li> <li>• Rapid stabilisation – Progressive stabilisation of disturbed areas as soon as practicable.</li> <li>• Perimeter controls – Installation of perimeter controls for the diversion of clean water around the earthworks extent and separate this from sediment-laden water within the site.</li> <li>• Employ sediment retention devices – Install treatment devices to maximise the efficiency of sediment removal within treatment devices.</li> <li>• Review – Review and revise the effectiveness of erosion and sediment controls on a regular basis to ensure that they are still effective and applicable to the current site conditions.</li> </ul>

I trust the information provided satisfies your queries however please do not hesitate to contact me should you require further clarification.

Yours sincerely

SCOPE PLANNING LIMITED



Stephanie Blick

PRINCIPAL PLANNER