PROPOSED RETIREMENT VILLAGE

PARK AVENUE, WAIKANAE

APPLICATION BY SUMMERSET VILLAGES (WAIKANAE) LIMITED FOR REFERRAL TO EXPERT CONSENTING PANEL UNDER THE COVID-19 RECOVERY (FAST TRACK CONSENTING) ACT 2020

November 2020

1. EXECUTIVE SUMMARY

1.1 This is an application for referral to an Expert Consenting Panel under the COVID-19 Recovery (Fast Track Consenting) Act 2020 for consent to construct and operate a comprehensive care retirement village at 32 Park Avenue, Waikanae ("**Project**").

1.2 Summerset has significant experience in developments of this nature, gained over its 30 years of operation, and has financing to fund the Project to completion. The application site ("**Site**") is located in an area of expected higher density residential development. In all respects the Project is "shovel ready" with construction expected to commence within approximately a month of receiving consent, and the Project developed in a staged manner over 5 – 7 years from commencement. Summerset directly manage all of their village construction internally (Summerset is the head contractor with directly employed project management). This gives Summerset a high degree of control over the construction process including quality and the careful management of temporary construction effects.

1.3 The Project has been significantly delayed through the Resource Management Act 1991 ("**RMA**") process on the basis of issues that can be satisfactorily resolved through conditions and that do not require the involvement of third parties. Both the district and regional applications have been placed on hold. There have been no notification decisions made on either of the resource consent applications lodged, and Summerset has not created any expectations of notification. The residual issues in contention are well understood and arise from differences in expert opinion. The delays experienced, and any further future delays, will have significant impacts on the availability of contractors, availability and cost of materials and the scarcity of aged care support in the local area relative to increasing demand. The Project will progress significantly faster through the fast track process.

1.4 There will be significant investment in the local community of approximately $150 million, providing jobs and significant flow-on economic benefits. There are opportunities through the Project for employment both locally, and for those in sectors that have been affected by COVID-19. The local construction industry will benefit, as well as the hospitality and accommodation sectors, where there have been widespread job losses in roles relating to accommodation, cafes and restaurants. Once the village is operational, it will create 30 to 50 full time equivalent local jobs such as for maintenance, management, caregivers and housekeepers. There will also be employment generated indirectly through demand on local services and suppliers for operating the village.

1.5 The development of affordable retirement village dwellings such as those in the proposed village would help to reduce land demand pressure and make further residential housing available. This increase in housing supply will help to relieve pressure on the housing market and will contribute towards improved housing affordability in the long term. Affordable housing and the realistic prospect of home ownership for younger generations provides the opportunity for more secure accommodation than renting, and long term investment opportunities.

1.6 The proportion of New Zealand's population over 75 is also anticipated to grow rapidly over the next 48 years. Being a Comprehensive Care Retirement Village, the Project would help to reduce the fiscal burden on the Government by supplementing the services provided by the District Health Board, as well as meeting the needs of older people that in terms of carer burden, would otherwise often fall on the working aged population.

1.7 Summerset has engaged with Te Ātiawa ki Whakarongotai Charitable Trust and Muaūpoko Tribal Authority and both iwi authorities have produced cultural value assessments for the Project. Summerset has consulted with Te Ātiawa and the consultation has resulted in Te Ātiawa confirming that it considers its concerns resolved. Consultation was also undertaken

with Muaūpoko under the Heritage New Zealand Pouhere Taonga Act 2014 and the archaeological authority has subsequently been issued. Summerset also takes pride in the efficiency of its operations and achieved carboNZero certification in 2019 which means that all carbon emissions produced are offset and there are initiatives implemented to further reduce its carbon footprint including by minimising waste to landfill.

1.8 There is no potential for the Project to have significant adverse environmental effects, and as outlined in section 8 below, adverse effects will be avoided, remedied or mitigated. Effects can be readily managed through conditions.

2. APPLICATION DETAILS

2.1 Applicant details

Person or entity making the request:	**Summerset Villages (Waikanae) Limited**
Contact person:	Steven Wickham
Job title:	Development Manager
Phone:	s 9(2)(a)
Email:	s 9(2)(a)
Postal address:	PO Box 5187, Wellington 6140

Address for service (if different from above)

Organisation:	Urban Perspectives Ltd
Contact person:	Mitch Lewandowski
Job title:	Resource Management Consultant
Phone:	s 9(2)(a)
Email:	s 9(2)(a)
Email address for service:	s 9(2)(a)
Postal address:	PO Box 9042, Wellington 6141

3. PROJECT LOCATION

3.1 The application (click to place an "X" in the relevant box):

☒ does not relate to the coastal marine area

☐ relates partly to the coastal marine area

☐ relates wholly to the coastal marine area.

Site location

3.2 28 and 32 Park Avenue, Waikanae.

Below is a site plan that identifies the location and the land that is the subject of this application.

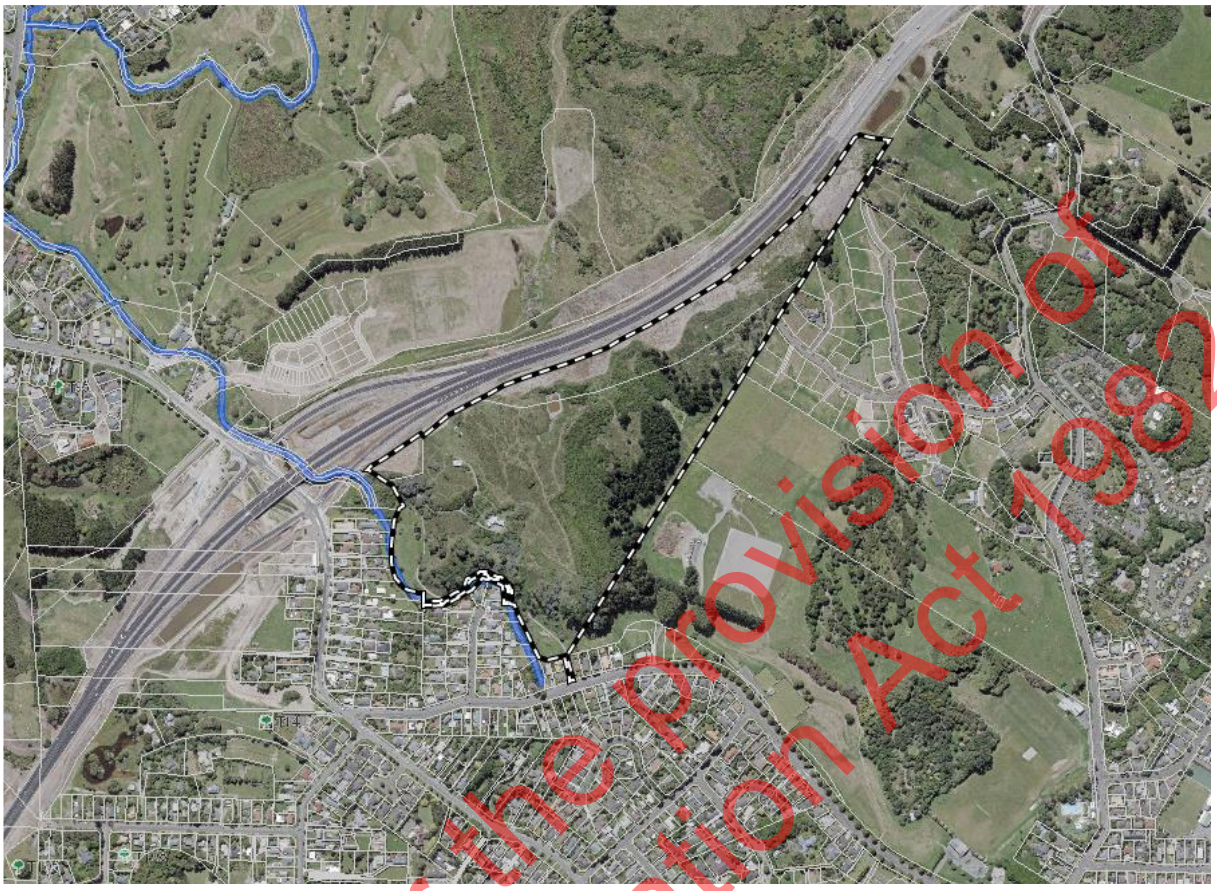

Figure 1. The application site. Source: Kāpiti Coast District Council e-plan.

Legal description

3.3 Secs 17-20 SO 505441 and Lot 2 DP 27407

Copies of the above records of title can be provided on request.

Registered legal land owners

3.4 The Applicant, Summerset Villages (Waikanae) Limited, owns the relevant land.

4. PROJECT DETAILS

Project summary

Project name

4.1 Summerset Retirement Village – Waikanae.

Project details

4.2 The Project is the development of a Comprehensive Care Retirement Village. The village will comprise:

(a) 217 independent living units (cottages, villas and Louisville and Over / Under townhouses) in various configurations as shown in the application plans;

(b) a "Main Building" that will house 56 assisted living suites, 20 memory care suites, 43 care beds and associated staff and administrative functions;

(c) a range of resident amenities such as a bowling green, café, restaurant, swimming pool, library, recreation centre, cinema and residents shop;

(d) internal circulation and parking provision; and

(e) extensive site landscaping.

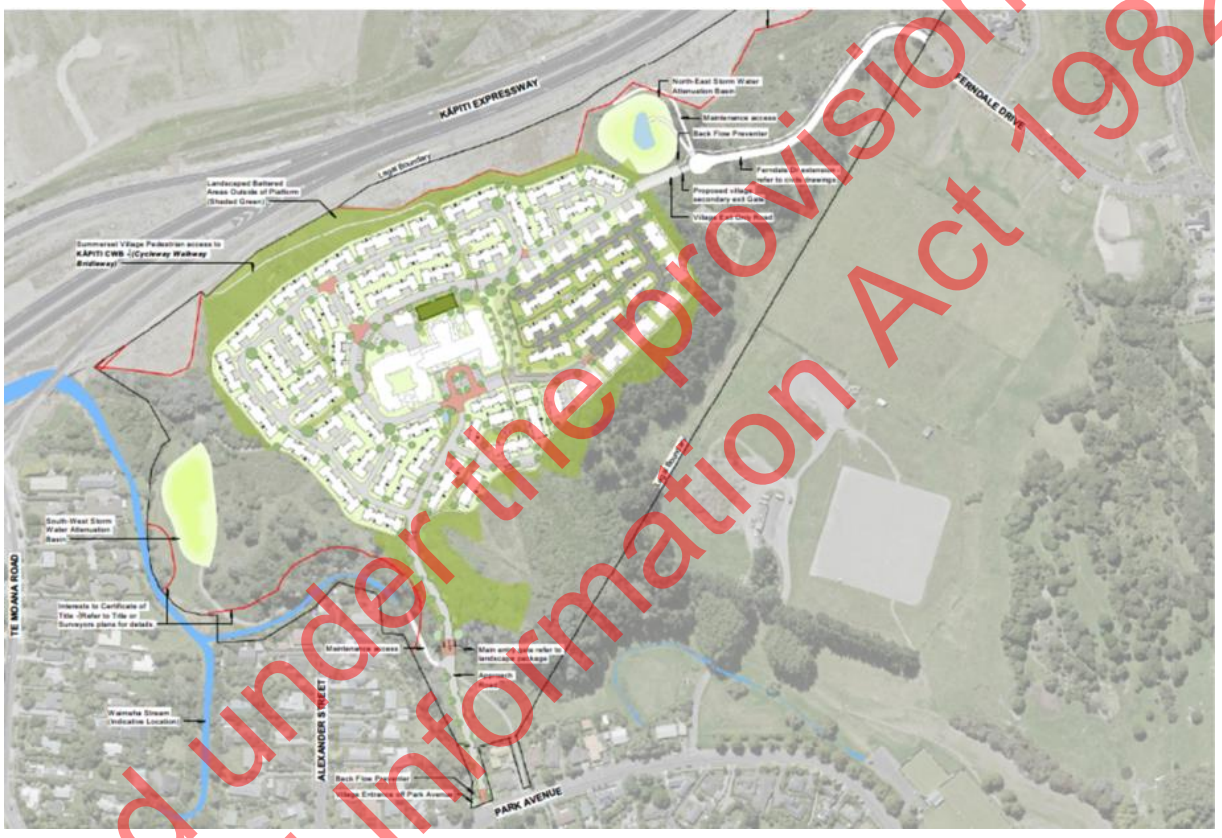

Figure 2 – Project layout. Source KCDC resource consent application – Appendix 2.

4.3 In order to establish the village, it will be necessary to:

(a) undertake earthworks to enable the Project on the Site by creating roading access, creating a suitable building platform comprising of two level terraces, and assorted works for the construction of required infrastructure (e.g. underground infrastructure and stormwater ponds);

(b) undertake vegetation clearance on portions of the Site as further described in this application;

(c) undertake site remediation works in the form of extensive landscaping and ecological mitigation of the areas that were cleared and earthworked;

(d) provide for the potential establishment of reserves along the south-western and eastern boundaries of the Site to provide for public access through the Site and to provide for amenity protections;

(e) provide a pedestrian linkage from the village to the Cycleway, Walkway, Bridleway ("**CWB**") Network;

(f) establish a new primary access to the village from Park Avenue. In order to provide this linkage, it is proposed to demolish the existing property at 28 Park Avenue;

(g) create a secondary exit only route from the village to an extension of Ferndale Drive;

(h) create two stormwater ponds for the attenuation of stormwater from the Site; and

(i) establish limited signage at the main entry to the village along with two temporary advertising billboards.

4.4 As a result of the size of the Project, the village construction will be undertaken in stages. As detailed in the Stantec assessment that formed part of the resource consent application, it is proposed to share residents, staff and visitor access along with construction traffic from Park Avenue for the initial stages of the village, before potentially moving construction traffic to the proposed Ferndale Drive connection for the latter stages of construction.

4.5 The staged roll-out of the village also means that some temporary activities are required during the earlier phases of construction and before the main building is completed. These are shown on the architectural and landscape drawings that formed part of the resource consent application, and include:

(a) a temporary recreation centre and associated car parking spaces;

(b) a show villa;

(c) a temporary operations office; and

(d) a temporary sales office.

4.6 As the village construction rolls-out, and in particular following the construction and occupation of the main building, these temporary activities will be ceased and reverted to their ultimate use, and where necessary deconstructed.

Where applicable, describe the staging of the project, including the nature and timing of the staging

4.7 The initial works will include an enabling works package, including a main access driveway from Park Avenue, vegetation clearance and initial archaeological investigations as well as further geotechnical investigations. The bulk earthworks and civil construction is expected to be finished within the first 3 stages of the six stage programme. High level programme indication is 5-6 months for bulk earthworks completion. A typical stage is 18 months, with the Project intending to be undertaken during a 5-7 year period. Note stages do overlap. The Main Building is intended to be completed by Stage 3.

4.8 Summerset has significant experience in developments of this nature and has financing to fund the Project to completion. Summerset is not dependent on pre-sales to fund any aspects of the Project. As such no delays are expected between any stages of development and completion of the Project as soon as possible will be Summerset's priority. In all respects the Project is "shovel ready".

Consent / approvals required

4.9 Relevant local authorities: Kāpiti Coast District Council ("**KCDC**") and Greater Wellington Regional Council ("**GWRC**").

Resource consent(s) / Designation required (click to place an "X" in the relevant box/s):

☒ Land-use consent	☐ Subdivision consent	☐ Coastal permit
☒ Water permit	☒ Discharge permit	☐ Designation
☐ Alteration to designation		

4.10 Summerset seeks all necessary consents for the Project. Summerset considers the following resource consents are required:

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
Kāpiti Coast District Plan	Rule 3A.3.1	For the clearance of indigenous vegetation protected in Schedule 3.2 of the District Plan	Restricted Discretionary Activity	Areas proposed for construction
Kāpiti Coast District Plan	Rule 3A3.4	Earthworks exceeding permitted activity standards	Restricted Discretionary Activity	Village platform, access roads and curtilage to provide for associated infrastructure
Kāpiti Coast District Plan	Rule 9A.3.4	For earthworks within a flood hazard (ponding) area	Restricted Discretionary Activity	A small area of the Site near Park Avenue
Kāpiti Coast District Plan	Rule 11E.3.1	For generating more than 100 vehicle movements per day	Restricted Discretionary Activity	Whole Site
Kāpiti Coast District Plan	Rule 11P.4.1	For non-compliance with the required car parking provision	Discretionary Activity	Whole Site
Kāpiti Coast District Plan	Rule 11E.2.1	For the construction of a new road	Controlled Activity	A short section of road linking the Site to an existing road at Ferndale Drive
Kāpiti Coast District Plan	Rule 12.C.2.1	For non-compliance with permitted activity standards for signage	Restricted Discretionary Activity	At three locations across the Site

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
Kāpiti Coast District Plan	Rule 12D.4.1	For non-compliance with noise standards	Restricted Discretionary Activity	At the Park Avenue frontage
Kāpiti Coast District Plan	Rule 11B.3.1	For non-compliance with water demand standards	Restricted Discretionary Activity	Whole Site
Kāpiti Coast District Plan	Rule 5C.4.2	For the development of a Neighbourhood Development Area within the Ngārara Structure Plan	Discretionary Activity	Whole Site
Kāpiti Coast District Plan	Rule 5A.3.1.	Various non-compliances with bulk and location standards	Restricted Discretionary	Whole Site
Proposed Natural Resources Plan	Rule R52A	Stormwater from new subdivision and development	Restricted Discretionary Activity	Whole Site
Proposed Natural Resources Plan	Rule R56	Investigation of, or discharges from contaminated land	Discretionary activity	Localised areas of the Site
Proposed Natural Resources Plan	Rule R101	Earthworks and vegetation clearance over 3000m^2 in area	Discretionary Activity	Whole Site
Proposed Natural Resources Plan	Rule R108	Diversion of water into wetlands	Non-Complying Activity	Three locations across the Site
Proposed Natural Resources Plan	Rule R125	Structures within a Site identified in Schedule C of the Plan	Restricted Discretionary Activity	Waimeha Stream
Regional Freshwater Plan	Rule 5	Discharge of stormwater to freshwater	Discretionary Activity	Waimeha Stream
Regional Soil Plan	Rule 2	Soil disturbance exceeding 10,000m^2	Restricted Discretionary Activity	Whole Site
Regional Plan for Discharges to Land	Rule 3	Discharge of contaminants not otherwise provided for	Discretionary Activity	Whole Site

RELEVANT PLAN / STANDARD	RELEVANT RULE / REGULATION	REASON FOR CONSENT	ACTIVITY STATUS	LOCATION OF PROPOSED ACTIVITY
NES Soil Contamination	Regulation 9	To disturb soil that has the potential to be contaminated	Controlled Activity	Small localised areas of the Site
NES Freshwater	Regulation 54	Earthworks within 10m of a natural wetland and diversion of water	Non-Complying Activity	Three locations across the Site

4.11 The Project does not include any activity that is a prohibited activity under the RMA, its regulations, a Plan or Proposed Plan.

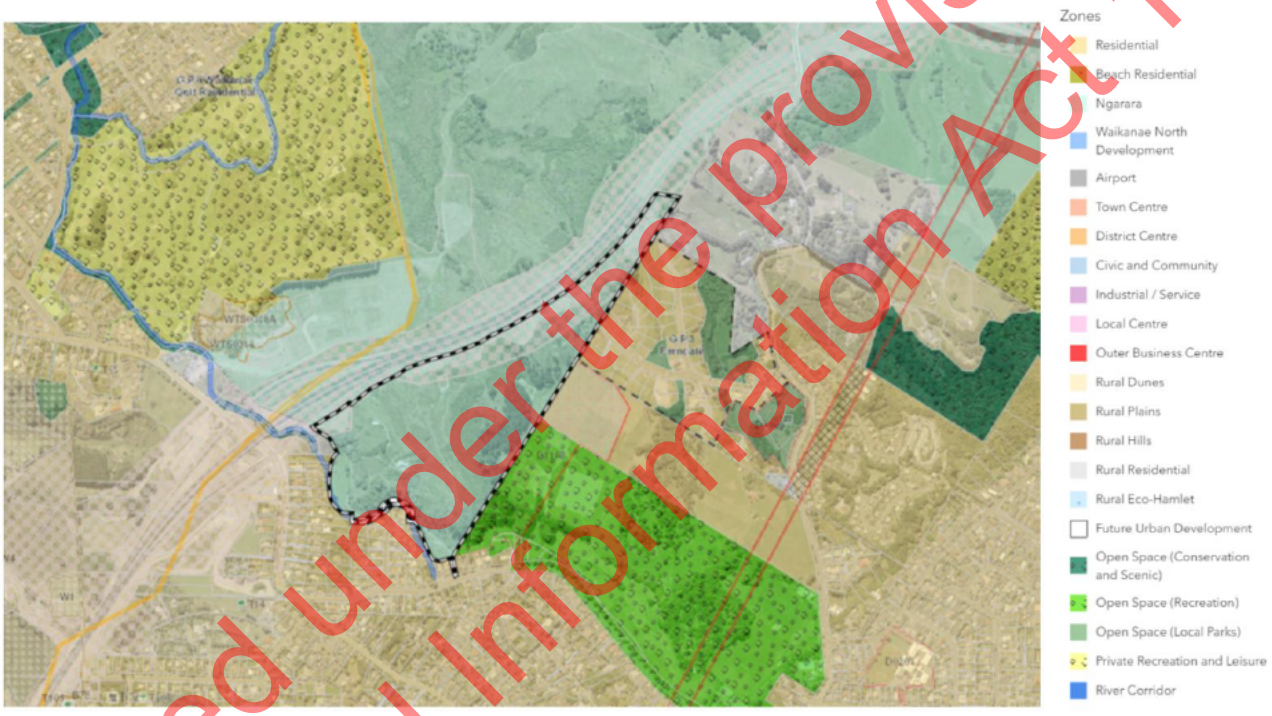

Figure 3. The Site and surrounding area showing zoning under the PDP. Source: Kāpiti Coast District Council e-plan.

Relevant zoning, overlays and other features

4.12 The Site is principally zoned "Ngārara" under the Kāpiti Coast District Plan ("**District Plan**"), with a small portion zoned "Residential" (being the smaller residential property at 28 and the access strip at 32 Park Avenue). The Ngārara zone is one of the residential zones contained in the District Plan providing for residential activities of varying densities. The Ngārara zone enables residential activities across a range of development clusters while maintaining the rural coastal character of the zone. The Site is located in an area of expected higher density development, and therefore the retirement village proposed through the Project is contemplated in this zoning. The Site and surrounding area, along with zoning, are shown in Figure 3. Further detail on the zoning of the site from both consent applications can be provided on request.

4.13 In terms of relevant overlays or notations, the following apply:

(a) the Site is partly subject to the Mackays to Peka Peka ("**M2PP**" or "**Expressway**") designation;

(b) the Site is partly subject to a Special Amenity Landscape overlay;

(c) the entire Site is located within the 'Coastal Environment' overlay; and

(d) small parts of the Site are subject to various flooding notations, notably the southern corner of the Site and 28 Park Avenue.

Resource consent applications already made, or notices of requirement already lodged, on the same or a similar project

4.14 Applications have been made to both KCDC and GWRC (together, the "**Councils**") in respect of the Project, for the consent requirements described at 4.10. Full copies of these applications can be provided on request.

4.15 Summerset has provided further information to both Councils to address information requirements, and has refined the Project to address potential environmental effects as described in section 8 below. Both applications are at the stage of the Councils making notification decisions, and final notification decisions have not yet been made. These applications have been placed on hold.

4.16 Should the Minister refer this application, then the consents currently applied for will be withdrawn before a new application is lodged with an expert consenting panel.

Consents / designations by other parties

4.17 No resource consents/designations are required for the Project by anyone other than Summerset.

Other legal authorisations

4.18 As the Site was associated with human activity prior to 1900, an archaeological authority is required under the Heritage New Zealand Pouhere Taonga Act 2014. The authority has been obtained. A copy of the authority can be supplied on request.

Construction readiness

4.19 Summerset directly manage all of their village construction internally (Summerset is the head contractor with directly employed project management). This gives Summerset a high degree of control over the construction process including quality and the careful management of temporary construction effects.

4.20 Summerset expects construction to commence within approximately a month of receiving consent, with the Project developed in a staged manner over 5 – 7 years from commencement.

4.21 Works had been programmed to commence in February 2021 on the expectation that resource could be uplifted by the end of 2020.

s 9(2)(b)(ii)

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5. CONSULTATION

Government ministries and departments

5.1 Summerset has consulted with Waka Kotahi- NZ Transport Agency ("**Waka Kotahi**") in respect of the applications as lodged with the Councils. This has resulted in ongoing discussions between Summerset and Waka Kotahi, now focussing on potential conditions of consent that would address any issues of relevance to Waka Kotahi.

Local authorities

5.2 Summerset engaged in several pre-application discussions with both the KCDC and GWRC in preparing its applications. Since lodging those applications, and in responding to further information requirements from each Council, Summerset has amended its applications as necessary through responses to those information requests and has continued to meet with the Councils as necessary.

Other persons / parties

5.3 It is Summerset's view that no other parties are affected by the Project. Accordingly, Summerset has not engaged with any other groups or neighbouring property owners.

5.4 Summerset is willing to meet with the District Health Board Portfolio Manager about the plans for the Project, including the award winning Memory Care Centre which forms part of the Project.

6. IWI AUTHORITIES AND TREATY SETTLEMENTS

Iwi authorities

IWI AUTHORITY	CONSULTATION UNDERTAKEN
Te Ātiawa ki Whakarongotai	Summerset has consulted with Te Ātiawa. A record of that consultation can be provided on request. The consultation has resulted in Te Ātiawa confirming that it considers its concerns resolved. Summerset has agreed to engage Te Ātiawa in the preparation of Management Plans and monitoring requirements as required for the Project, along with agreeing to the presence of an Iwi representative during earthworks, as confirmed in the record of consultation.
Muaūpoko	For the purposes of the application for an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014. The archaeological authority has subsequently been issued. Muaūpoko have not been identified as an affected party by either KCDC or GWRC.

Treaty settlement entities

TREATY SETTLEMENT ENTITY	CONSULTATION UNDERTAKEN
NA	NA

Treaty settlements

6.1 The Project does not involve land returned under a Treaty settlement.

7. MARINE AND COASTAL (TAKUTAI MOANA) ACT 2011

7.1 The Project is not within a customary marine title or protected customary rights area.

8. ADVERSE EFFECTS

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions

Summary

8.1 As set out in further detail below, the effects of the Project have been extensively assessed and can be appropriately managed. Summerset is confident that all effects can be appropriately managed through conditions of consent, and that, if referred, the input of parties through the COVID-19 Recovery (Fast-track Consenting) Act process will be appropriate to enable the Expert Consenting Panel to make a fully informed decision on the Project.

8.2 In discussions with the Councils in relation to the applications, the three key effects raised by the Councils related to construction traffic and onsite ecological impacts on wetlands and Mahoe. In all respects, these can and should appropriately be addressed through conditions of consent:

(a) Construction traffic - The level of construction traffic is entirely consistent with a residential development, as contemplated by the Site's zoning. An onsite cut and fill balance has been achieved for the Project to minimise heavy traffic movements. Summerset acquired a residential property (after the main site was acquired) on Park Avenue to provide for the main entrance to the village to be off the more arterial road and to balance the construction effects between neighbours on different sides of the Site. As supported by the Integrated Transportation Assessment ("**ITA**"), and from Summerset's extensive experience with similar projects, this is an issue where conditions of consent can comfortably address any realistic concerns.

(b) Wetlands – Summerset's expert's ecological advice is that the impacts on wetlands are minor at worst, and potentially positive. While the GWRC officers have a different view, those issues can be addressed through the Expert Consenting Panel Stage, if the Project were referred. There is no need for further public input, particularly given the GWRC, Director General of Conservation and Forest and Bird would all be involved in the Expert Consenting Panel Stage.

(c) Mahoe – The site has 3.3 hectares of Mahoe forest and comprises two distinct parts (Mahoe Area 1 and Area 2). The ecological assessment concludes that the Mahoe is a moderate value habitat. The Project would require the removal of 2.25 hectares of the Mahoe forest. It is not feasible to appropriately avoid or mitigate this effect, so in accordance with policy direction of the District Plan, Summerset proposes restoration planting at a 1:2 ratio for Mahoe Area 1, and a 1:1.5 ratio for Mahoe Area 2. This will result in an offset total area of 3.64 hectares replanted for the loss of 2.25 hectares of forest. There is no need for further public input, particularly given the KCDC, GWRC, Director General of Conservation and Forest and Bird may be involved in the Expert Consenting Panel Stage.

Bulk and Location Effects

8.3 The Project does not meet two bulk and location standards for the zone, being compliance with permitted height (relating to the 'main' retirement village building) and for outdoor living space requirements.[1] The breach of the permitted height standard has been assessed by Boffa Miskell as part of the Landscape and Visual Effects Assessment. The building is located

[1] Standards 5A.1.6.7 and 5A.1.6.10.

centrally within the Site as part of a wider master planned village. It will have negligible impacts on neighbouring properties given the topography of the area, and in views from the west will sit against the dune backdrop as part of a wider site.

8.4 Given the nature of a retirement village and how outdoor open space is planned and provided for, it is impractical to comply with an outdoor living space requirement on a per unit basis when the standard is designed for traditional residential housing. Outdoor open space has been designed to Summerset's established and proven design standards as a combination of private open space and communal open space.[2]

8.5 Overall, any effects from the breach of maximum height will have less than minor effects and any effects from the non-compliance are considered to be negligible.

Transportation Effects

8.6 The application is supported by an ITA.[3] That assessment has been refined through responses to further information requests from KCDC. Roading within the development will be private and has been designed to Summerset's village design standards.

8.7 Two access points are proposed for the village. The main entry is proposed from 28 Park Avenue, and a secondary exit-only connection is proposed to connect to an extension of Ferndale Drive to the north of the application Site. This secondary exit-only connection will be used as an entry during certain stages of construction. Ferndale Drive has been designed and constructed in order to allow for a future connection into the application Site.

8.8 Principal transportation effects relate to traffic movements during construction and following completion of the village.

Transportation effects from construction

8.9 Construction traffic will be present in the area over the years that the village is constructed. The ITA considers the impacts of construction traffic on both Park Avenue and Ferndale Drive. This includes assessment of the design capacities of both Park Avenue and Ferndale Drive, their existing traffic loads, and the additional construction traffic from the proposed village. The ITA concludes that both Park Avenue and Ferndale Drive can accommodate the anticipated construction traffic without adversely affecting their function.

8.10 Construction traffic movements will be temporary and daily construction vehicle movements at the Park Avenue access will be less than the vehicular movements anticipated from the village when completed. Earthworks traffic will be minimised through achieving a cut-fill earthworks balance on the Site, meaning there will be little need for removing soil from the Site. The ITA recommends the preparation of a Construction Traffic Management Plan as a condition of resource consent to manage ongoing effects.

8.11 In respect of Ferndale Drive, and in response to a further information request, a comparative assessment was undertaken contrasting expected construction traffic from the village as compared to construction traffic from a nominal (based on District Plan minimum lot sizes) subdivision. The assessment found that construction traffic from the village would be comparable to a general subdivision, but that the village had a number of benefits namely being a development undertaken by a single builder, over a defined timeframe. This would enable coordination and control of traffic movements, rather than a number of individual

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2 Further detail on Summerset design standards can be provided on request.

3 Further detail as contained in the ITA can be provided on request.

property owners developing independently. It would also mean that defined stages are undertaken together, rather than by ad-hoc development on a lot by lot basis.

8.12 Summerset has experience in delivering these types of Projects across the country and that transportation effects from construction can be appropriately managed through conditions. A condition of consent addressing construction traffic is proposed as follows:

Construction Traffic Management Plan

1. Prior to the commencement of any site development works for each stage of the development, the consent holder shall submit a Construction Traffic Management Plan (CTMP) to Council for certification by the Team Leader Resource Consents. The purpose of the CTMP is to manage the traffic effects associated with the undertaking of earthworks and building construction throughout the earthworks and construction period. The CTMP shall contain, but not be limited to, the following information:

    a. Roads to be used by construction traffic;

    b. Anticipated types of vehicles numbers of construction worker vehicles and delivery trucks during each phase of construction;

    c. Recommended maximum sizes of trucks and demonstration with vehicle tracking that they can manoeuvre through Ferndale Drive within the built carriageway. No articulated trucks will be permitted to use Ferndale Drive

    d. Work hours;

    e. Parking arrangements for construction staff and how these will vary during the construction phases;

    f. Construction access, egress and site circulation over the entire construction period, which ensures that all construction staff/trade access the site in accordance with this consent;

    g. Provisions for temporary traffic management including signage and travel speeds;

    h. Measures for avoiding any carry of soil or any other material onto public roads;

    i. Procedures for undertaking pre-construction road condition survey of Ferndale Drive to establish a baseline condition of the road to be used by construction traffic, and a methodology for completing a post-construction road inspection at the conclusion of the construction phase, and for attending to any repairs identified; and

j. Storage of construction plant and material.

2. Any proposed amendments to the CTMP shall be submitted to the Team Leader Resource Consents for consideration and approval, prior to those amendments being implemented.

3. The consent holder must implement the certified CTMP through the duration of the site development period.

4. A copy of the certified CTMP shall always be held on site and shall be made available, on request, to any Council officer.

Transportation effects from operation

8.13 The ITA has shown that the surrounding road network is capable of accommodating the additional traffic from the village once completed with no mitigation or infrastructure upgrade required. It also contrasts the effects of the proposed village against a traditional residential development and finds the effects of the Project are lesser in scale.

8.14 The Project creates a shortfall of 45 car parking spaces against District Plan standards. The ITA assessed this shortfall as acceptable given the nature of the proposed land use, and that based on a specific assessment of the parking provision required for a retirement village, the amount of parking provided exceeds this requirement. The National Policy Statement for Urban Development ("**NPS-UD**") also requires that minimum car parking requirements for a particular development in the District Plan are removed.

8.15 Drawing on the ITA prepared in support of the application, the effects of the Project will not adversely affect the capacity of the surrounding road network and the internal design of the village road network and parking capacity is appropriate.

Earthworks

8.16 The Project requires earthworks in order to create the central platform nestled into the Site's natural topography for the retirement village of some 8 hectares, and ancillary earthworks for the creation of roading, associated batters, installation of infrastructure and the formation of stormwater detention basins.

8.17 In total, earthworks will involve a volume of approximately 300,000 m^3 and will be spread over an area of approximately 14 hectares. The works will have maximum cut depths of 18 metres and maximum fill depths of 10m. The earthworks have been designed to achieve a cut-fill balance on the Site, thereby avoiding traffic movements from transporting material from the Site. The earthworks methodology is set out in the application documents. Earthworks will be staged in line with the overall build programme.

8.18 Earthworks effects will relate to their visual impact, erosion and sediment control and dust management.

Visual impact

8.19 The proposed earthworks have been designed to maintain the current characteristics of the Site. This is by maintaining the eastern dune on the Site as a barrier and screen to the east and south, and by filling in the existing "natural amphitheatre" along the north-western side of

the Site to create two stepped building platforms sitting above the Expressway. The Landscape and Visual Assessment considers the landscape and visual effects of the earthworks and overall Project.[4] It considers that the Site is "reasonably well contained" with principal views into the Site coming from the north and west and from closer proximity, as more distant views are screened by variations in topography. The main earthworks volume to create the village footprint is oriented away, and screened from, the main residential areas in closest proximity to the Site along Park Avenue and to the east/north-east and south.

8.20 The Landscape and Visual Assessment discusses how views will vary from the surrounding environment. While the earthworks required for the formation of the main access route will be visible to some degree from some surrounding properties, it considers that the rapid stabilisation of these cuts, along with the proposed replanting and other landscaping measures will result in temporary and less than minor effects on these residential properties in terms of visual effects. To the north and west, views into the Site are more distant with the principal interface with the Site being with the M2PP Expressway and neighbouring CWB. This separation to residential properties, views taken when passing along the Expressway or CWB, the temporary nature of the effects and proposed remediation, will result in acceptable environmental effects. Visual effects in respect of the Expressway will be low, and in terms of the CWB moderate-low at Year 1, reducing to very low at Year 10 as planting becomes established and matures.

Erosion and sediment control

8.21 Erosion and sediment control, and the management of associated effects, are central to the proposed earthworks methodology. Erosion and sediment control methods have been prepared with reference to the relevant GWRC guidelines as well as KCDC's "Subdivision and Development Principles and Requirements".[5]

8.22 Sediment controls for the Site will primarily involve the use of sediment retention ponds and decanting earth bunds. The proposed erosion and sediment control measures have been designed to meet or exceed the relevant Council guidelines. Measures related to erosion control are designed to slow down stormwater flows, dissipate energy, reduce the overall amount of sediment generated from exposed areas of earthworks, and decrease the overall volume of sediment transported to the sediment control devices. The measures to be employed include runoff diversion channels, clean water diversion channels, check dams and drop out pits amongst others.

8.23 Sediment control will be managed by devices designed to reduce the loading of sediment discharged into the Site and wider environment, by allowing sediment to settle before it is discharged. The measures to be employed include sediment retention ponds, decanting earth bunds and silt fences amongst others.

8.24 Where previously earthworks were required in the Waimeha stream for the installation of an outlet structure, the Project has been amended to no longer require this structure.

Conclusion on earthworks effects

8.25 With the mitigation proposed by Summerset, the visual effects of the Project during the construction phase of the village will be temporary and acceptable. The measures proposed in respect of both sediment and erosion control, and dust management in line with the

4 Further detail as outlined in the Landscape and Visual Assessment can be provided on request.
5 These guidelines can be provided on request.

proposed management plan, will manage these effects to a minimal and acceptable level. These measures will be secured by conditions of consent.

Landscape and Visual Amenity Effects

8.26 In addition to the visual effects of the proposed earthworks described in the preceding section, this section considers landscape character effects and urban design effects of the village itself.

8.27 The District Plan identifies part of the Site as being located within a Special Amenity Landscape ("**SAL**"). There is no resource consent requirement associated with development inside of the SAL, but there are relevant policy considerations. The Landscape and Visual Assessment prepared in support of the application highlights that the SAL itself is extensive, and that the application Site occupies only a small portion of the SAL at its south-eastern extent.

Figure 4. The Special Amenity Landscape as it applies to the Site. Source: Kāpiti Coast District Council e-plan.

Figure 5. The entire Special Amenity Landscape with the Site highlighted in the south-west. Source: Kāpiti Coast District Council e-plan.

8.28 The assessment notes that the qualities of the SAL only partly relate to the Site and are more illustrative of the qualities of the wider environment. The assessment considers that significant changes have occurred in this area in recent times (such as the M2PP Expressway) introducing change into the environment. The Site is also identified for development through the Ngārara Structure Plan. The landscape character effects of the Project are considered by the assessment to be moderate-low. Taken in the context of the Site being identified for urban development, the SAL only applying to part of the Site, and the extensive planting proposed for the Site, it is considered that any effects in relation to landscape character, and the SAL, are acceptable.

8.29 Urban design considerations are principally directed internally to the village. The height of the proposed main building is not considered to create any adverse urban design effects, and its location within the Site and blocked from views is not considered to give rise to any shading, privacy or bulk and dominance effects. In urban design terms, its height and location within the village provides for positive legibility effects for occupants and visitors through its height contrast.

Conclusion on landscape and visual effects

8.30 Visual amenity effects have been carefully considered with respect to surrounding properties. The assessment has found that in respect of a few properties, visual amenity effects can be described as having a low scale of effect at Year 1 by virtue of clearer views into the Site, reducing from low to very low over time as the village construction progresses and mitigation measures are implemented. Such temporary visual effects resulting from construction are considered to be acceptable, particularly in the context of the mitigation works that are proposed, namely extensive landscaping and the treatment of earthworked batters.

Ecological Significance and Ecological Values

8.31 The application is supported by an Ecological Impact Assessment ("**EIA**") prepared by Boffa Miskell.[6] Describing the Site, the EIA highlights the dominance of exotic vegetation communities within the Site, reflective of the former rural land use on the Site. Notwithstanding the predominantly exotic vegetation that dominates the Site, the EIA highlights a small number of ecological sensitivities on the Site which are described below. Care has been taken to ensure that sensitive areas such as wetlands are avoided. Where an ecological effect cannot be avoided, such as in the case of the proposed clearance of an area of Mahoe forest, Summerset proposes a suitable environmental off-set to ensure a positive ecological outcome.

8.32 There are no Ecological Sites (Schedule 3.1) identified in the District Plan on the Site, nor does the Site contain any Rare or Threatened Vegetation Species (Schedule 3.3) or Key Indigenous Trees (Schedule 3.2A). The Site contains Mahoe which is identified as a Key Indigenous Tree Species By Size in Schedule 3.2 of the District Plan.

Wetlands

8.33 In summary, in relation to wetlands on the Site, Summerset is taking a conservative approach where a monitoring regime is proposed, and remedial works can be undertaken if necessary, but the likelihood of such an eventuality is considered to be low. While an offset is not considered to be required, Summerset has also volunteered as part of the application the creation of a new enhancement wetland. The Project is anticipated to have a neutral or positive effect on the Trackside wetlands.

8.34 In accordance with Proposed Natural Resources Plan ("**PNRP**") criteria, all natural wetlands areas on the Site are considered to be significant natural wetlands. These are identified in the EIA and are described as the Trackside, Roadside and Carex wetlands.

8.35 Notwithstanding the classification made by the PNRP of all natural wetlands being considered to be significant, the Boffa Miskell assessment found the ecological values of these wetlands to be low.

8.36 Of the three natural wetland areas, the Trackside and Roadside wetlands are proposed to be incorporated into stormwater detention basins (but separated from the basins by bunds). Stormwater detentions basins are required by the Project in order to achieve stormwater management requirements for the Site. Extensive Site investigations and an assessment of alternative options have confirmed the appropriate location for these basins to be in the same wider areas as these two wetlands.

8.37 In order to establish these basins, works would be required in proximity to the wetlands, but not within the wetlands, which would be left undisturbed.

8.38 In the original EIA undertaken, the following assessment of wetland effects was made:[7]

> Without mitigation, there is an expected to be major alterations to key elements and features of the existing baseline in each natural wetland irrespective of the expected increase in water flows and water permanence. This equates to a High Magnitude of Effect on the Trackside and Roadside wetlands. A High Magnitude of Effect on the Low Value wetland systems results in a Low Overall Level of Effect on each area. There are design and engineering techniques which can be

6 Further detail from the Ecological Impact Assessment can be provided on request.

7 Ecological Impact Assessment, paragraph 6.2.1.

utilised to avoid direct effects on the natural wetlands while still allowing for the required stormwater retention volumes. If this occurs, there will be no effects on the wetlands.

8.39 Since the application EIA was prepared, and following ongoing discussions with GWRC, the design has been reworked and the stormwater basins have been amended to (through the mitigation hierarchy) avoid / minimise adverse effects. This has involved resizing and reshaping the stormwater basins to avoid all direct physical effects and to mimic as far as possible the stormwater inflows to the Wetland areas resultant of the Stormwater Management required onsite. Further assessment undertaken confirms that the changes will be of a low magnitude. Further works have been undertaken to better understand the hydrological changes, which relate to short periods of increased water depths within the wetlands following significant rainfall events.

8.40 The Trackside wetland is described by Boffa Miskell as being dominated by exotic common vegetation. Boffa Miskell consider that under a "no development" scenario this wetland will trend further towards terrestrial and exotic dominated communities. In the absence of management, it is considered that the wetland will progress to a blackberry thicket and eventually willow or conifer community as seen nearby onsite. The same situation applies to the Roadside wetland. The indigenous biodiversity values of these features is very low and their functions as wetlands are also ecologically unimportant in the local area. The Carex wetland is a wetter area and is not under the same pressure. However, over a longer timeframe it too will likely succumb as wilding pines and other exotic species move into the area.

8.41 The works required to establish the Trackside stormwater basin means that the stormwater basin will be installed around the wetland and the natural wetland area will not be physically affected (i.e. no earthworks or vegetation clearance). It will be bunded from the stormwater in the basin with a low bund that will mimic an existing bund that surrounds the wetland in its current condition. The catchment of the existing wetland is approximately 0.3ha and receives surface runoff from the trackside slope. The wetland itself is supported primarily by ground water. This surface catchment under the Project remains the same. From the assessment of the proposed works, there is nothing to suggest that there will be a hydrological change because the ground water and hill slope that currently feed the wetland will continue to do so after the works.

Figure 6. Works around the Trackside wetland. Source: Woods.

8.42 The value of the Trackside wetland is low because of its condition (exotic) and nature (induced). The magnitude of effect is negligible, resulting in a very low level of effect (irrespective of potential differing value assessments).

8.43 Based on the above (avoidance of adverse effects) Boffa Miskell do not consider that any mitigation or an offset will be required for the Trackside wetland. Nonetheless, to adopt a conservative approach, Summerset are volunteering a monitoring regime focusing on plant species persistence and health such that any unexpected changes of health or species because of the works can be targeted for remediation. It is noted that the trackside wetland is not a dune slack and there is a wider assemblage of plants in such wetlands to allow a greater scope to implement this remediation.

8.44 The recommended monitoring of the wetland and the general site works (including removal of most of the weed species) will enhance the ability of the wetland features to be maintained well above that which currently exists. In Summerset's experts opinion, the likelihood of needing any action after monitoring is low to none, but if hydrology changes result in a need then the wetlands are more likely to benefit and become far more representative of an indigenous example of their type than if no vegetation support occurs (or if the wetland were to remain in its current form).

8.45 The second wetland, Roadside, is a scattered small set of wetlands in a larger non-wetland dune hollow. The stormwater basin works will be installed around the wetland and the natural wetland areas will not be physically affected (i.e. no earthworks or vegetation clearance). It will be bunded from the stormwater in the basin with a low bund but there will be periodic rain fall related peak depth change in the wetland. The wetland itself is supported primarily by ground water. The surface catchment under the Summerset application is different and will result infrequently for a 52-hour period in an increase in depth of water in a 1-year event (50mm) in a depth at peak of 2m. This hydrological change (through “spillage” over the bund), is sufficiently temporary (short term), infrequent and of a magnitude that the existing wetland species (mostly tall *Juncus* and *Carex*) will not be adversely affected.

Figure 7. Works around the Roadside wetland. Source: Woods.

8.46 The value of the Roadside wetland is seen as low because of its very poor condition and lack of representativeness (exotic) and nature (induced). The magnitude of effect is at most low (but more likely negligible) resulting in a very low level of effect.

8.47 Based on the above (avoidance of adverse effects) Boffa Miskell do not consider that any mitigation or an offset will be required for the Roadside Wetland.

8.48 Nonetheless, to adopt a conservative approach again Summerset are volunteering a monitoring regime focusing on plant species persistence and health such that any unexpected changes of health or species because of the works can be targeted for remediation. It is noted that the Roadside wetland is a dune slack and there is a narrower assemblage of plants that can be used in response to any hydrological change. That said the Carex wetland is much wetter and provides a suitable guide for such a process if required.

8.49 The recommended monitoring of the wetland and the general site works (including removal of most of the weed species) will enhance the ability of the wetland features to be maintained well above that which currently exists. In our expert opinion, and despite a small and occasional hydrological change, the likelihood of needing any action after monitoring is low to none.

8.50 The third wetland on the Site is the Carex wetland. It is considered to be the largest and best vegetated of the three wetlands. It has a widely varying hydrology, being very wet in wet winters but is an ephemeral wetland that periodically dries up during summer. There are no direct physical effects to this wetland, as it has been avoided in terms of vegetation clearance or earthworks. However, there is recontouring of a slope above the wetland (covered in exotic pine) which is part of its surface water catchment. This will reduce the surface catchment of the Carex wetland from 5 to 4 ha in that part of its catchment.

8.51 The reduction in catchment size caused by this recontouring will reduce (by 20%), during rain fall, the discharge of water to the wetland. This nominally reduces the discharge during rain, but it is ground water that sustains the wetland. The adverse effect of such a temporal change

is difficult to quantify, but it is considered that the vegetation is of a type and nature that the minor surface catchment change resulting in less rainfall is highly unlikely to result in a wetland-vegetation change. A monitoring regime is recommended to be sure of this result. If subsequent monitoring of the wetland indicates a material change in hydrology has occurred then remedial actions are available and can be implemented (felling some of the surrounding pines to reduce the amount of run-off uptake by the pines could achieve the balance).

8.52 The potential effects of the Project on wetlands stem from changes to the hydrology caused by the earthworks necessary to establish the Site and create stormwater detention ponds. Changes to hydrology are assessed as occurring infrequently in particularly heavy rainfall events. Even in such events, however, the additional rainfall is modelled as draining in a short timeframe. Consequential effects on the wetland vegetation communities are considered to be negligible and anticipated by the residential zoning of the site.

8.53 In terms of approaches to avoid, minimise and remedy potential adverse effects, the Project has sought to avoid direct effects on the wetlands as outlined above by resizing and reshaping the stormwater basins to avoid all direct physical effects and to mimic as far as possible the stormwater inflows to the Wetland areas resultant of the stormwater management required onsite. A monitoring regime is proposed, and in the event that the wetlands were adversely affected, remedial works can be undertaken such as supplementary planting of wetland species more tolerant of changes to hydrology. The likelihood of such an eventuality is considered to be low.

8.54 In addition, while an offset is not considered to be required, Summerset has volunteered as part of the application the creation of a new enhancement wetland adjacent to the existing Trackside wetland of approximately 300m^2 of perennial wetland and 330m^2 ephemeral wetland habitat, together with a further 580m^2 riparian and peripheral buffer of vegetation to support and protect the wetland habitats. The creation of this new wetland area will further enhance the wetland environment on the Site and will be used in the dispersal of water from the Trackside stormwater basin to the adjoining stream.

8.55 Summerset considers that these matters can be appropriately managed through conditions, on assessment from the Expert Consenting Panel. Through that process there will be opportunity for the parties listed at section 17(6) to be invited for comment by the Expert Consenting Panel (for example Forest and Bird and the Environmental Defence Society).

Stream Ecology Effects

8.56 A tributary of the Waimeha Stream runs alongside the Site before joing the Waimeha Stream. The Waimeha Stream supports fish species that include At Risk species and is “one of the least turbid streams along the Kāpiti Coast.” The diverse range of species, and its spring fed nature means it is likely resilient to “climatic and annual variations, and urban stressors…”, however, its overall quality and other indicators reduce the overall values of the stream. The Waimeha Stream is considered to be a significant waterway under the Proposed Natural Resources Plan ("**PNRP**"). The EIA considers the stream to have moderate ecological values.

8.57 The potential effects on stream ecology relate to the control of stormwater and sediment from the Site, and management measures proving inadequate during high rainfall events. Given the low likelihood of such an occurrence, and subject to appropriate monitoring and maintenance, such an event would have a high magnitude of effect, on a low value macroinvertebrate community, resulting in a low overall level of effect.

8.58 Effects on aquatic fauna are likely to stem from discharge events, though unlikely. Effects on the habitat of giant kokopu relate to discharges affecting pools within the stream habitat used

by kokopu, resulting in displacement. This is a high magnitude of effect on giant kokopu, a high value species, resulting in a very high level of effect overall. In terms of other species, the effect is low. Appropriate site management techniques can sufficiently mitigate the risk of such events occurring through the Environmental Management Plan ("**EMP**").

8.59 The EIA concludes that with the implementation of the report's recommendations in respect of freshwater, resulting effects will be appropriately managed.

8.60 A Stormwater Management Plan ("**SMP**") prepared in support of the application also addresses potential effects on the stream. It outlines the approach to stormwater management on the Site and has been refined in response to further information requests from GWRC. This has resulted in minor amendments to satisfactorily address issues raised by GWRC. Implementation of the SMP is expected to be a requirement of any consent approval.

Mahoe Forest

8.61 The Project seeks to clear an area of Mahoe on the Site. The regenerating Mahoe forest has an overall area of 3.3 hectares and is described in the EIA as being composed of two distinct parts (Mahoe Area 1 and Area 2) reflecting the tree height and understorey species. The Project seeks to remove 2.25 hectares of the Mahoe forest. Both areas of Mahoe forest achieve low scores for representativeness, diversity and pattern. Two habitats have moderate ecological values but achieve a moderate score for rarity/distinctiveness and context due to its age and size within an area that has less than 10% native vegetation cover.

8.62 The assessment considers the loss of this Mahoe to be a high magnitude effect given it will result in the loss of some 68% of the vegetation community. It considers that a high magnitude effect on a moderate value habitat to result in a moderate overall level of effect. It is not feasible to appropriately avoid or mitigate this effect, so in accordance with the policy direction of the PDP consideration was given to offsetting this effect.

8.63 The recommended off-set is restoration planting which is proposed at a 1:2 ratio for Mahoe Area 1, and a 1:1.5 ratio for Mahoe Area 2. This will result in a total area of 3.64 hectares replanted for the loss of 2.25 hectares of forest. Details of the proposed planting are contained in the regional consent application and can be provided on request, this will also be included in the EMP.

Conclusion on ecological effects

8.64 The Site contains areas of ecological value and significance, notably a stand of regenerating Mahoe forest, planting undertaken as part of the M2PP Expressway (not affected by the Project), sections of the Waimeha Stream and some ephemeral wetland areas.

8.65 The assessment has identified the relevant values of the Site ecology and assessed the impacts of the proposed works. Overall, the effects likely to arise from the Project can be appropriately managed through conditions such that any effects are acceptable.

8.66 In the case of the Mahoe forest, it is not possible to appropriately avoid or mitigate such effects. Summerset proposes an off-set as recommended in the EIA and that appropriate conditions of consent secure this requirement in line with the accompanying EMP.

8.67 In relation to the wetlands, the Project is anticipated to have a neutral or positive effect on the Trackside wetlands. Summerset is taking a conservative approach where a monitoring regime is proposed, and remedial works can be undertaken if necessary, but the likelihood of such an eventuality is considered to be low. While an offset is not considered to be required,

Summerset has also volunteered as part of the application the creation of a new enhancement wetland.

Environmental Management Plan

8.68 The preparation of an Environmental Management Plan ("**EMP**") is a requirement of the KCDC District Plan in respect of this site. An EMP, in draft form, was prepared with the application. The EMP can be provided on request.

8.69 It begins by considering the ecological impacts of the Project as identified through the separately provided EIA and highlights the methods proposed to protect ecological values. These include the impacts on the mitigation planting undertaken as part of the M2PP Expressway, the specific protection of the regenerating Mahoe on the Site not subject to site works, and the impacts on the Waimeha Stream from the construction of the stormwater discharge structure.

8.70 In respect of wetlands, the EMP describes the methods to be employed to avoid and mitigate effects on the wetlands on the Site. These matters are further considered in the resource consent application made to GWRC. The EMP recommends the preparation of a Natural Wetland Management Plan ("**NWMP**") prior to the commencement of construction to ensure the above objectives related to wetland management are achieved. The Applicant agrees with this recommendation and volunteers a suitable condition of consent requiring the preparation and approval of an NWMP.

8.71 In respect of the impacts on the regenerating Mahoe forest located on the Site, the EMP proposes an environmental off-set in the form of revegetation planting. Specifically, it is proposed to undertake replanting across 3.64 hectares of the Site, in the form of mixed native vegetation. The EMP then provides proposed planting details.

8.72 A monitoring regime is also proposed by the EMP relating to a number of issues including stormwater, native vegetation, invasive plant species, ecological connections, aquatic habitat health and indigenous fauna.

8.73 Overall, the proposed EMP considers the relevant requirements of the District Plan, identifies the relevant environmental outcomes, and proposes a range of methods to address the impacts of the Project. It is envisaged that the EMP will be further refined through a condition of resource consent and it will be implemented in order to appropriately address the environmental impacts of the Project.

Site Contamination

8.74 Resource consent is required under the NES-CS due to background concentrations of certain metals and metalloids exceeding regional background levels. Resource consent is required as a controlled activity, both a Preliminary ("**PSI**") and Detailed Site Investigation ("**DSI**") have been prepared in support of the application. These can be provided on request.

8.75 The DSI recommends the preparation of a Site Management Plan to manage contamination related effects. The Management Plan will address any specific consent conditions imposed by the Council and will “provide guidance to the civil works contractor regarding appropriate handling and removal of isolated areas of soils showing minor (above background) heavy metal/metalloid concentrations.”

Conclusion on site contamination effects

8.76 Any effects from the Site works on soil contamination will be negligible provided that works are undertaken in line with a suitably prepared management plan and in accordance with industry standards. There will be some positive effects resulting from ensuring that any areas of site contamination are appropriately addressed.

Infrastructure Effects

8.77 The application is supported by a comprehensive Infrastructure Assessment, which has been supplemented by responses to further information requests from both KCDC and GWRC. The Infrastructure Assessment can be provided on request.

8.78 The assessment describes the approach to the management of stormwater, and the provision of water and wastewater networks in the application Site. It also notes that the supply of water for irrigation purposes will be provided from a new bore which is subject to a separate application to GWRC.

Conclusion on infrastructure effects

8.79 The infrastructure design proposed has been developed in consultation with KCDC to achieve an acceptable outcome with regard to the Council's District Plan and Code of Practice requirements.

Flooding Effects

8.80 A small area along the access route into the Site, near Park Avenue, is subject to flooding as recorded in the District Plan. The flooding is limited to low lying areas at the southern boundary and south-west corner of the Site and shown as ponding and overland flow areas.

8.81 The SMP details consideration on the floodplain resulting from the Project, drawing on modelling of the catchment by Jacobs on behalf of KCDC. That assessment, along with additional analysis by Woods leads to a conclusion that the Project:

> causes negligible effects in flood depths or flood extents in the area, as the loss of floodplain area does not affect maximum flood depths or extents, and increases in flooding depths of 20mm to 60mm in a localised area of uninhabited land is immaterial to the flood risk posed by the 1% AEP scenario analysed.

Conclusion on flooding effects

8.82 The Project causes negligible effects in flood depths and extents.

Archaeological and Tangata Whenua Effects

8.83 The application is supported by an archaeological assessment. This assessment was also the foundation for an application for an archaeological authority from Heritage New Zealand which has now been obtained. That assessment can be provided on request.

8.84 Archaeological effects relate to effects on existing and known archaeological sites, and potential sites that may be discovered as a result of site works. A visual inspection of the Site highlighted six previously unrecorded potential sites of archaeology interest. The report concludes that there is a high likelihood of encountering shell middens and earth ovens as these are common in sites in Kāpiti dune areas. It further concludes that there is "some

likelihood" of koiwi tangata (human skeletal remains) being encountered on the Site, either from deliberate burial or from those killed in warfare.

8.85 The report concluded that:

> Archaeological investigation and monitoring of earthworks for the M2PP Expressway immediately adjacent to the subject property uncovered a large number of archaeological deposits including midden and oven features which contained a number of artefacts. It can be reasonably expected that similar deposits will be encountered in the relatively unmodified dunes on the subject property.
>
> The subject property has seven recorded archaeological sites which are likely to have in situ remains, as well as being the location of several other archaeological sites investigated in response to M2PP Expressway construction works. In the case of in situ sites the mapped locations of these sites represent their visible surface extent rather than extent of subsurface deposits.

8.86 A range of recommendations are then made to appropriately address the effects of the Project:

(a) That the Applicant engage with Te Ātiawa ki Whakarongotai Charitable Trust in respect of the archaeological assessment and subsequent resource consent application – this has taken place.

(b) That earthworks will impact on both recorded and unrecorded archaeological deposits and an archaeological authority will be required from Heritage New Zealand – an archaeological authority has been obtained

(c) That appropriate mitigation of effects would involve the advance investigation and documentation of archaeological sites following the removal of topsoil from the earthworks area. The archaeological work should be outlined in an archaeological management plan endorsed by Heritage New Zealand.

(d) That prior to the removal of vegetation, archaeologically sensitive areas should be marked with a temporary cordon to minimise damage from machinery, and the Project area should be inspected again immediately following the vegetation removal to identify areas for investigation in advance of the main body of earthworks.

Conclusion on archaeological and tangata whenua effects

8.87 Summerset expects these recommendations to be formalised through conditions of consent, as relevant, including the preparation of an Archaeological Management Plan. This, coupled with the archaeological authority from Heritage New Zealand, will lead to archaeological effects resulting from site works being managed appropriately.

8.88 Summerset has engaged with Te Ātiawa ki Whakarongotai Charitable Trust about the Project. An initial response from the Trust was provided with the application. In that response the Trust identified a number of matters over which it held concerns or required further information. These are recorded in the application document.

8.89 Since that time, Summerset has continued to engage with the Trust to address any outstanding matters of concern. The Trust has ultimately confirmed that it is satisfied with the information provided by Summerset and that it has no objection to the Project. Confirmation of the Trust's position is provided with this application.

Noise Effects

8.90 Noise effects relate to two aspects of the Project. The first is in relation to reverse sensitivity matters relating to the neighbouring State Highway. The District Plan contains standards addressing the development of noise sensitive activities (such as residential development) in proximity to the State Highway. The requirement is to 'treat' buildings within a specified setback of the highway. A noise assessment prepared in support of the application recommends a suitable approach to achieve this requirement and this matter forms a part of the application that can be secured by a specific condition of consent.

8.91 The second aspect was noise from vehicles entering and exiting the Site on two immediately adjoining residential properties. This matter has been addressed through the inclusion in the Project of a noise attenuating fence which suitably addresses the matter to meet the District Plan standards.

Conclusion on noise effects

8.92 Noise effects can be managed through a condition of consent and inclusion of a noise attenuating fence.

Signage Effects

8.93 The original application proposed two signs at the entrance to the village that exceeded District Plan standards which allow for a sign of 0.2m^2 (each sign proposed is 1.58m^2). The signs will be incorporated into new entrance gate structures and are considered to be appropriate with reference to the immediately surrounding residential environment.

8.94 This further application now incorporates two additional signs, being two temporary advertising billboards. One is to be located at the Park Avenue access to the Site, adjacent to 30 Park Avenue, and the other on the northern side of the Site that will be visible from the State Highway. Both these signs do not meet District Plan standards in terms of their area, and in the case of the State Highway side sign, a required setback from the State Highway.

8.95 Waka Kotahi will have an interest in the sign near the State Highway and are aware from initial consultation that Summerset want to erect a sign visible from the State Highway. No additional consultation has occurred as yet, however, Summerset intends to continue discussions with Waka Kotahi in respect of this sign. The sign adjacent to 30 Park Avenue is proposed within the access to the Summerset village Site to be visible to traffic travelling along Park Avenue.

Greenhouse Gas Emissions

8.96 The proposed retirement village density has advantages over traditional lower density development in reducing greenhouse gas emissions through density. There are a range of amenities provided on-site that reduce the need for residents to travel.

8.97 As compared to traditional residential development, the village is inherently a lower generator of vehicle movements from residents, minimising resultant emissions. The village will have a village van that is utilised for group outings, thereby further minimising vehicle movements by residents. The village is positioned in close proximity to a number of key amenities enabling access to these amenities (such as the Waikanae Golf Club) on foot or by mobility scooter.

8.98 Summerset take pride in the landscaping of their villages and will provide extensive landscaping throughout the Site, including specimen trees and additional Mahoe forest, which

is maintained by full time onsite gardeners. That new flora (much of which will be protected) will have the effect of absorbing carbon (carbon sink) from the atmosphere.

8.99 Summerset is New Zealand's first retirement village operator to be Toitū carbonzero certified and is a member of the Climate Leaders Coalition. Summerset is also member of the New Zealand Green Building Council. All unavoidable emissions are offset and there is an ongoing plan to reduce carbon emissions, with a goal to reduce operational emissions intensity by 5% by 2022.

8.100 In terms of the Project's day-to-day operations, Summerset has goals in place to reduce carbon emissions in five target areas and this includes initiatives in of new developments such as the Project, as set out below:

(a) energy, where key initiatives include;

(i) emission friendly designs;

(ii) seeking carbon neutral electricity suppliers; and

(iii) electric pool covers to keep heat in the heated pools.

(b) waste, where key initiatives include;

(i) village design layouts that include effective waste management;

(ii) green waste collections; and

(iii) supplier take-back schemes.

(c) paper;

(i) moving paper-based records online;

(ii) printers with FollowMe printing to cut down on unclaimed printing; and

(iii) double sided printing on default.

(d) travel; and

(i) Zoom video-conferencing facilities;

(ii) improved travel planning; and

(iii) ride sharing.

(e) fertilisers.

(i) selecting environment-friendly fertilisers for garden maintenance.

9. NATIONAL POLICY STATEMENTS AND NATIONAL ENVIRONMENTAL STANDARDS

General assessment of the project in relation to any relevant national policy statement and national environmental standard

9.1 The National Policy Statements and Environmental Standards that are relevant to this Project are the:

(a) NPS-UD.[8]

(b) National Policy Statement for Freshwater Management ("**NPS-FM**").

(c) New Zealand Coastal Policy Statement ("**NZCPS**").

(d) National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ("**NES-CS**").

(e) National Environmental Standards for Freshwater ("**NES-F**").

NPS-UD

9.2 Objectives 1, 2 and 4 of the NPS-UD are of particular relevance to the Project. These objectives direct that:

(a) Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

(b) Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.

(c) Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities and future generations.

9.3 The Project will give effect to these objectives in the following ways:

(a) The Project will utilise a Site that is zoned for urban/residential development. It will create housing for retirees in an area of high demand and will have the consequential effect of freeing up housing stock in the immediate district and wider region as people move into the new village. In turn, this will allow future residents to provide for their social and economic wellbeing, along with their health and safety.

(b) The Project will contribute to the overall supply of housing in the district, thereby contributing to housing affordability.

(c) The Site is generally contained within a basin and by State Highway 1. It is generally screened and well separated from neighbouring residential development. Therefore, while the Project will introduce some change to the area, it is considered that any effects on amenity values will be minor overall, and entirely consistent with Objective 4 of the NPS-UD.

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[8] The original application as lodged with KCDC and GWRC was made prior to the current NPS-UD, under the previous National Policy Statement on Urban Development Capacity which has now been replaced.

9.4 As detailed in the application documents, the Housing and Business Capacity Assessment prepared by KCDC under the earlier National Policy Statement on Urban Development Capacity, noted an overall shortage of development capacity in the district over the long-term, and a particular focus on smaller housing. The assessment notes:

> While Kāpiti has experienced growth across a cross-section of its age groups, it has a high and growing proportion of residents over 50 years of age. This is linked to strong growth in the retirement sector and contributes towards its high percentage of single (30%) and two person (40%) households across the District.

9.5 Accordingly, it is considered that the Project is strongly aligned with the objectives of the NPS-UD.

NPS-FM

9.6 The principal effects of the Project as relevant to the NPS-FM relate to Policy 6:

> There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.

9.7 There are three wetland areas located on the Site. These areas have been thoroughly considered in the design of the Project. Potential effects related to these wetlands relate to earthworks in their proximity and the diversion of additional water into these areas in certain storm events. Such effects will not result in a loss of extent of wetlands. There are no direct physical works proposed within the wetlands and no wetlands will be reclaimed. Further detail is provided in the effects assessment above.

NZCPS

9.8 While the Site is significantly inland from the coast, the District Plan identifies the Site as being within the coastal environment. A Landscape and Visual Effects Assessment prepared in support of the resource consent application to KCDC concludes that the Site is 1.4km inland and shows negligible evidence of current coastal influence. The Project will therefore have negligible effects on the natural character of the coastal environment, and matters relating to biodiversity, landscape effects and heritage have been addressed by the Project. Accordingly, considerations relevant to the NZCPS are limited, and where relevant the Project is considered to be consistent with the NZCPS.

NES-CS

9.9 The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health ("**NESCS**") is relevant to the Project. Both a Preliminary Site Investigation and Detailed Site Investigation have been undertaken for the Site. The conclusion of those assessments is that a resource consent is required under the NESCS as a controlled activity.

NES-F

9.10 The NES-F contains regulations relating to certain works in and around wetlands. As noted above, the Project does not involve any works directly within wetlands, nor does it involve drainage or reclamation of wetlands. However, earthworks within 10m of a wetland that are not for the purposes of wetland restoration require resource consent under the NES (Regulation 55) as a non-complying activity.

10. PURPOSE OF THE ACT

Project's economic benefits and costs for people or industries affected by COVID-19

10.1 As discussed in further detail below, the Project represents a significant investment in the local area through both the construction of the retirement village and its operation.

Economic benefits during construction

10.2 Construction has historically been a major driver for growth within New Zealand, directly employing about 258,000 people in residential, heavy and civil construction, and constructions services.[9]

10.3 Due to the effects of COVID-19, a number of projects have been delayed due to the periods of lockdown New Zealand underwent as a response to the virus. The Ministry of Business, Innovation and Employment ("**MBIE**") has found that it is too early to conclude on the impact that this will have on employment, however, the applications for government support for businesses show a significant number of construction businesses (56,300) needed support in the form of wage subsidy or other support payments.

10.4 Similarly, commercial and residential construction intentions have fallen significantly since February 2020. Longer term impacts are expected to be seen in the deferral of funding for private developments and capital projects in the corporate sector (e.g. for airlines, airports, tourism, retail and hospitality).

10.5 As a result, MBIE conclude that the construction sector will be reliant on a pipeline of fast-tracked consent activity, which will also work as a part of the economic recovery and rebuild following COVID-19. Whilst construction demand is predicted to continue to fall, fast-tracked construction activity (such as the Project) will work to offset these losses and fill the gap in terms of employment and construction activity where funding for private developments in heavily impacted sectors is deferred.

10.6 The Project represents an approximate $150 million investment in the local area providing jobs and significant flow-on economic benefits to the local community through the construction phase. Of that investment, between 77% and 88% is expected to remain within the region, with the remaining 12% to 23% being spent within the wider New Zealand economy. For every dollar spent by Summerset on construction, 40% is spent on salaries to local employees and on local supplies. This will provide jobs and significant flow-on economic benefits to the local community affected by the economic impacts of COVID-19.

10.7 There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers. There will also be associated financial and development contributions for local councils as part of the development.

10.8 Indirect benefits include supplies and services purchased by Summerset's construction team, or by contractors engaged by Summerset. These include the wholesale and retail building supplies, and legal, telecommunications, administrative and accounting services. The vast majority of Summerset's contractors and materials are locally sourced, ensuring that the benefits remain within the local economy. Other professional services, such as real estate and conveyancing services, are expected to benefit as housing is released into the market.

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9 Construction factsheet: October 2020, COVID-19 economic update, MBIE.

Economic benefits during operation

10.9 Around 65% of staff employed for operation of the village are caregivers and housekeepers. The village will also employ other qualified professionals such as registered nurses, a village manager, property managers and diversional therapists. As provided in the New Zealand Aged Care Workforce Survey 2016, the aged care workforce is predominately made up of women aged 45 and above.[10] Summerset's employment data also reflects this trend, with approximately 80% of staff being female.

10.10 COVID-19 has had a disproportionate effect on women in the workforce, with women having fared worse than men across key labour market measures since COVID-19 began impacting New Zealand's labour market.[11] Nationally, the seasonally adjusted number of people in employment fell by 31,000 between the March and September 2020 quarters, with over two thirds (22,000) being women. This is reflected in the widespread job losses experienced in sectors that predominately employ women. One sector that has shown this trend is tourism, with job losses in roles such as accommodation, cafes and restaurants.[12] The Project operations include many wider roles in staffing the resident amenities such as the bowling green, café, restaurant, swimming pool, library, recreation centre, cinema and residents shop which will provide opportunities for those in the hospitality sector. The Project therefore presents employment opportunities for people that are likely to have been affected by COVID-19.

10.11 Summerset will also seek to recruit locally where possible, and will engage a range of local contract resources.

10.12 The provision of healthcare through the Project would be efficient due to factors such as:

(a) Earlier identification of health problems as residents are regularly assessed.

(b) Reduced emergency or unnecessary call outs with assessments accessible on site.

(c) Centralised location for healthcare and social welfare services.

(d) Lower healthcare costs (hospital stays), and more efficient care with multiple people visited by healthcare professionals in the same location.

10.13 The Project would also be cost effective in relation to Council and public services, as the provision of on-site amenities such as a library and pools reduces pressure on these services within the local community. Further, capital expenditure and maintenance costs for infrastructure (such as drains and roads) within the site would be borne by Summerset. Rates would also be charged on the retirement village as a whole. This reduces both administrative and capital costs for the Council.

10.14 Caring for vulnerable people such as parents, grandparents, family or friends can often place a financial, time and emotional burden on carers, especially when this case is a full time responsibility. This burden often falls on a working aged generation and many carers both need to and want to work, but are unable to due to this responsibility. The retirement village would enable carers to return to the workforce which may ease the financial situation of the carer while contributing to the local economy. Financial pressures on many carers are likely to be exacerbated by the effects of COVID-19.

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10 New Zealand Aged Care Workforce Survey 2016, at 3.

11 COVID-19's impact on women and work, Stats NZ, 4 November 2020.

12 COVID-19's impact on women and work, Stats NZ, 4 November 2020.

Flow on effects

10.15 The economic impacts of the Project will include flow-on effects that arise indirectly from the development and operation of the retirement village, these include:

(a) approximately 76 percent of construction spending by Summerset stays within the New Zealand economy and for every dollar spent on developing a Summerset village, 20 percent is spent on salaries to local employees and only 12 percent of the construction spend is attributed to imported goods;

(b) increased business for local firms and industries supplying goods and services to the retirement village during the construction phase and thereafter during the future village operation;

(c) salaries earned by local residents being spent on purchasing household goods and services, boosting the regional economy;

(d) increased housing both through the provision of new housing in the retirement village and the release of usually large family homes which are released back on the market for more efficient use;

(e) "new money" coming into the area as a result of the retirement village, for example residents and staff relocating from outside the area and spending by relatives and friends of the village residents who live outside the Waikanae area;

(f) increased household incomes flowing through the local community; and

(g) possible increased visitor benefits.

Project's effects on the social and cultural wellbeing of current and future generations

10.16 The Project would have a range of positive effects on the wellbeing of multiple generations. In terms of older generations, there are the following social benefits:

(a) Elderly people are more vulnerable to fraud and other forms of "elder abuse". The wider community often do not know about these scams and elderly people either do not realise what has happened or are too embarrassed to report the events. A retirement village provides a sense of security as retirement village units are well protected and residents have support networks within the retirement village.

(b) Summerset staff build a rapport with residents providing them with a sense of security. This security helps residents to be comfortable enough to ask questions and talk to staff, providing a sense of companionship. Summerset helps to foster a sense of community within the retirement village and encourages residents to be outgoing and socially involved by creating interactive social events and activities.

(c) Other measures to provide a safer community are extra sensory lighting, CCTV and well lit pathways which are provided through the adoption of Crime Prevention Through Environmental Design ("**CPTED**") standards.

10.17 For the working aged generations, there would be increased employment opportunities and a decreased burden for the family and loved ones of the residents where they would otherwise be family carers and this has emotional, financial and physical benefits. Due to the proposed

location of the retirement village, local residents will also be able to stay within their local communities and remain connected with friends and family.

10.18 Summerset developments have a higher population density than traditional residential development, with Summerset developments at a density of approximately 40 per hectare (as opposed to the highest density of 27 per hectare in Auckland). The development of affordable, high-density retirement village dwellings will reduce land demand pressure and make further residential housing available as new village residents release their properties to the market. This increase in housing supply will help to relieve pressure on the housing market and will contribute towards improved housing affordability in the long term. Lack of affordable housing is widely considered to be one of the biggest issues nation-wide, and disproportionately affects younger people. Affordable housing and the realistic prospect of home ownership for younger generations provides opportunity for more secure accommodation than renting, as well as long term investment opportunities to improve financial security.

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case

Executive summary of progress anticipated under each process

10.19 The Project has been significantly delayed through the RMA process on the basis of issues that can be satisfactorily resolved through conditions and that do not require the involvement of third parties. There have been no notification decisions made on either of the resource consent applications lodged with KCDC or GWRC, and both of these applications have now been placed on hold. The notification decisions have also not been referred to any independent commissioners. As notification has not occurred, there is no community expectation of involvement in the consideration of this Project and Summerset considers that it would be progressed in an appropriately rapid manner under the Act's process.

10.20 As set out clearly above, the two key issues that have created delay in the Council process are construction traffic and onsite ecological effects and Summerset considers that notification is not necessary to resolve these matters. These matters can be appropriately managed through consent conditions and both GWRC and KCDC and other stakeholders will have opportunity to provide comment through the expert consenting panel process.

Progress with the Councils to date

10.21 Summerset has lodged resource consent applications for the Project under the standard RMA process with the relevant consent authorities, KCDC and GWRC:

(a) The district consent application was lodged with KCDC in April 2020, and a request for further information was made under section 92. Subsequently, KCDC communicated that it intends to at least limited notify the application to a number of properties. The application has not progressed to a Council decision on notification.

(b) The regional consent application was lodged with GWRC on 5 May 2020. A request for further information under section 92 of the RMA was made on 18 May 2020. Summerset provided a response to this on 20 July 2020. Since then, Summerset and the Council have been involved in ongoing discussions in relation to the issue of notification. Summerset requested that the application be placed on hold and sought that the notification decision be referred to an independent commissioner. This was in order to resolve these issues (differences of expert opinion) and to ensure the consent is processed as efficiently as possible. However, due to ongoing

issues with the Council, the application has not progressed to a decision on notification.

10.22 Through the processing of its consent applications for the Project under the standard RMA process, Summerset has already experienced considerable delays. In addition, if the applications continued under the standard RMA processes both Councils have indicated that the corresponding applications would be subject to a public notification process. Summerset has been progressing to be ready to start the site works in February 2021.

10.23 Summerset's firm position, on the basis of the assessment of effects described above and contained within the respective applications, is that notification (either public or limited) is not justified. The prospect of public notification (despite Summerset's clear position that notification is not justified) and the consequential risk of subsequent appeal to the Environment Court would result in significant further processing delays to the Project. Summerset has had recent experience of two proposals going through the Environment Court process, for its St Johns and Boulcott villages. In both cases, the involvement of third parties resulted in consent ultimately being granted for the proposal, but with a significantly protracted process.

10.24 It is clear there are likely to be significant time savings in processing this application under the Act. Given Summerset's recent experience with retirement village applications that have been through an Environment Court process, Summerset anticipates that the potential time saving through use of the fast-track process could be in the order of 12-18 months.

Whether the Project may result in a 'public benefit'

Employment / job creation:

10.25 The Project represents an approximate $150 million investment in the local area including providing jobs and significant flow-on economic benefits to the local community through the construction phase. This includes jobs in construction work as well as real estate operations.

10.26 As detailed above, there are also likely to be flow on effects from the Project for employment and job creation in:

(a) local firms and industries supplying goods and services to the retirement village during the construction phase and thereafter during the future village operation; and

(b) "new money" coming into the area with residents and staff relocating from outside the area and spending by relatives and friends of the village residents who live outside the Waikanae area.

10.27 Once the village is operational it is expected to directly create 30 – 50 full time equivalent ("**FTE**") local jobs in the village such as caregivers and housekeepers, as well as many more jobs indirectly through demand on local suppliers being used to provide goods and services required to operate the village. These positions are expected to be filled by workers living in the region and as outlined above, Summerset seeks to recruit locally where possible.

10.28 It is anticipated that approximately 10 FTE Summerset construction staff will be employed over the course of the Project. A further 50 – 150 FTE construction staff per year of construction will also be employed during various stages of the works.

10.29 Summerset does not directly procure any materials, furniture or equipment from overseas. All materials are sourced from the region's suppliers and construction is undertaken by New Zealand based contractors. As set out at 10.8 above, where possible Summerset seeks to

source materials locally and a significant portion of construction spending is on local contractors and suppliers.

Housing supply

10.30 The Kāpiti Coast, including Waikanae, has seen significant development in recent years and is expected to continue to grow with the completion of Transmission Gully (in addition to the new Expressway). This has driven strong growth in the residential market with median prices in Waikanae increasing by approximately 46% since 2016.

10.31 As outlined above, the development of affordable retirement village dwellings such as those in the proposed village, would reduce land demand pressure and make further residential housing available as new village residents release their properties to the market, to be more efficiently used by families.

Contributing to well-functioning urban environments

10.32 The Project is to be located within a site identified and zoned for urban development. It will be largely contained by the existing dune topography of the Site, with minimal visual interface with surrounding residential properties. The Landscape and Visual Assessment prepared in support of the application noted that:[13]

> The proposal is of compact urban form that responds to the landform of the Site with a range of building heights (and platforms) rising from the naturally lower western edge of the village towards the higher outer rim of dunes which form a natural boundary to the village. The outer edges of these dunes that will remain as a result of construction, create containment and limit views into the Site from the surrounding areas.
>
> Proposed native planting on the reshaped batters would reinstate the natural vegetated edges affected by the proposal. Further potential open space provisions in the southern part of the Site (subject to negotiation) would allow for the managed conservation of the Waimeha Stream, a significant waterway with beneficial open space (ecological and recreational) links from neighbouring residential areas to the district-wide CWB pathway network.
>
> While the Site will be modified through earthworks and building construction, the proposal will result in a concentrated urban form surrounded by considerable areas of open space. Combined with potential open space provisions, the proposal has many similarities with that anticipated in the District Plan for the Ngārara Zone.

10.33 Accordingly, the Project is considered to achieve a positive interface with the surrounding residential environment, maintaining the amenity of surrounding properties, and ensuring a private and secure environment for future village residents. The Project has been assessed against the Ngārara Structure Plan which applies to the Site and has been found to be consistent with the outcomes sought by the Structure Plan.

10.34 Summerset build and maintain their own infrastructure being drains, roads, gutters and other capital requirements within the village. At the same time they pay development contributions to local councils (in excess of $25 million over the next five years), for the construction of public infrastructure external to Summerset's villages.

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13 Landscape and Visual Assessment, paragraph 5.41.

10.35 The ITA undertaken as part of the land use consent application provides that the Project is likely to generate daily site traffic demands of around 960 vehicle movements per day. This indicates that the traffic flows will be less than the level of traffic, and outside of the peak commuter times, than would otherwise be expected in conjunction with standard residential development on the same Site.[14]

10.36 The arrangement of access, parking and servicing have been assessed as being appropriately designed in either meeting the relevant provisions of the District Plan or industry recognised best practice standards, with traffic outcomes that match the needs of the retirement village.[15]

10.37 As is concluded in the ITA, the traffic activity of the proposed retirement village fits in well with the local transportation and roading environment and can be developed to provide logical access and connectivity for a range of travel modes, from cars to mobility scooters.[16]

10.38 The location of the Site immediately adjoining existing residential development, and in an area that is zoned for urban development, means that the Project is a logical expansion of an existing urban area. The Project will also be serviced by an internal network of private roads.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity

10.39 The proposed village would contribute to improving housing infrastructure in the Waikanae area and through both construction and ongoing operations would increase employment outcomes and productivity also. On average, for every dollar spent on construction, around 77% to 88% is retained in the region and the remaining 12% to 23% is spent within the wider New Zealand economy.

10.40 Summerset will also contribute more than $4 million in financial and development contributions for local councils as part of the development which will support local public growth infrastructure, public community reserves (including environmental initiatives) and employment from infrastructure and reserve projects.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity

10.41 Assessment undertaken by Boffa Miskell identifies the wetlands located on the Site as being of low ecological value, as they are dominated by exotic and terrestrial vegetation. These wetlands are also expected to disappear within a short period under the current land use and conditions due to weed vine, tree invasion and resultant shading and drying.

10.42 The Project will preserve the wetlands and offer possibility for enhancement. The Project would result in changes to the hydrology of the wetlands to make them wetlands in perpetuity, rather than ephemeral. Existing plant communities are anticipated to naturally adapt to the changes over time, and this can be supplemented by remedial planting of native vegetation. As outlined above, the wetlands are expected to become more representative of indigenous wetlands over time as a result of this. Monitoring during and following completion of the works will confirm the extent to which any remedial planting is required, but the likelihood of any action being required following monitoring is low.

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14 Integrated Transport Assessment at 8.

15 Integrated Transport Assessment at 8.

16 Integrated Transport Assessment at 1.

10.43 In addition, the creation of the enhancement wetland will result in an overall improvement in wetland habitat provided by the Project.

Minimising waste and contributing to NZ's efforts to mitigate climate change and transition more quickly to a low emissions economy (in terms of reducing NZ's net emissions of greenhouse gases)

10.44 In 2018 Summerset became the first retirement village operator in New Zealand to achieve CEMARS (Certified Emissions Measurement and Reduction Scheme) certification. This provides third party certification to ensure accurate and consistent carbon measurement, reduction and neutrality claims.

10.45 Summerset also achieved carboNZero certification in 2019, which means that all carbon emissions produced are offset and there are initiatives implemented to further reduce its carbon footprint, including by minimising waste to landfill.

10.46 There are also further efficiencies through the Project due to the intensified and self-contained nature of the development that provides amenities onsite and reduces the need for residents to drive elsewhere.

10.47 The Project would use land and construction resources efficiently given the increased density of the development and would enable the full use of existing housing that is large enough to accommodate multiple people and families, instead of necessitating further lower density large dwellings to be constructed.

10.48 Through the provision of extensive on-site amenities, services and recreation opportunities, communal transport for residents and provision for cycle parking and end of trip facilities, the village will reduce the vehicle use (and the associated carbon emissions) against more standard residential development.

Promoting the protection of historic heritage

10.49 An Archaeological Assessment was undertaken on behalf of Summerset in April 2020. This identified that there is reasonable cause to expect that earthworks on the Site will impact on both recorded and unrecorded archaeological deposits, and on this basis will require an archaeological authority to be granted by Heritage New Zealand before commencing. This authority was subsequently granted on 17 September 2020.

10.50 Summerset has also engaged with Te Ātiawa ki Whakarongotai Charitable Trust and Muaūpoko Tribal Authority and both iwi authorities have produced cultural value assessments for the Project. These are available upon request.

10.51 The Applicant has consulted with Te Ātiawa. A record of that consultation is provided with this application. The consultation has resulted in Te Ātiawa confirming that it considers its concerns resolved. Summerset has agreed to engage Te Ātiawa in the preparation of Management Plans and monitoring requirements as required for the Project, along with agreeing to the presence of an Iwi representative during earthworks, as confirmed in the record of consultation.

Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change

10.52 The Project would help to increase the social resilience of its residents in the event of a natural disaster by looking after the residents that are likely to otherwise be vulnerable if living on their

own. For example, in relation to stormwater management and flooding risks, freeboard is provided in accordance with the NZ Building Code, owing to accessibility requirements for older residents preventing a higher allowance. Further, if the home of a resident is destroyed by a disaster and it can't be rebuilt on the original site or in reasonable vicinity, they will receive the full market value of their home. Summerset also provide emergency water and power generation on site to ensure resilience for its residents through natural hazard events.

Other public benefits

10.53 The proportion of New Zealand's population over 75 is anticipated to grow rapidly over the next 48 years, with an anticipated increase of more than 1 million (or 17% of the population). In addition, people over 75 are living longer which requires further housing and creates a greater need for age-specific services such dementia and palliative care. Traditionally, the Government has subsidised a large portion of the aged care sector cost and with the increasing population this results in a fiscal burden. The Project would be part of an alternative solution to reduce this fiscal burden by meeting the needs of older people.

10.54 The Kāpiti Coast is seen as a popular destination for retirees in New Zealand, but the area lacks high quality retirement villages with comprehensive care facilities. The area was one of the earlier adopters of the retirement village model with the majority of villages built without the expectations of modern day retirees in mind. Many of the existing retirement villages are older and provide no comprehensive care living options. They offer no continuum of care and rely on (rather than supplement) healthcare services provided by District Health Boards.

10.55 There is growing demand for Comprehensive Care Retirement Villages and the area lacks supply for these types of villages, and aged care living more generally. Comprehensive care retirement villages provide for a range of retirement living and care options, including independent units such as cottages, villages, townhouses and apartments. It also provides the full range of aged care, including services or assisted living, rest-home, hospital and dementia level care. Summerset's Comprehensive Care Retirement Village in Paraparaumu has proven to be one of its most popular retirement villages. While residents are mostly local, around 20% of the residents of this village are from outside the Kāpiti Coast.

10.56 By 2023, the Kāpiti Coast (including Waikanae and Ōtaki) will only have aged care living to support 20.1% of the population over 75. Less than half of this will be comprehensive care retirement villages, being 8.8%. In the Waikanae area alone the supply issue is greater, having aged care living supply for only 10.1% of the population over 75 and only 4.2% being provided by comprehensive care retirement villages. The Project would more than double this supply to 20.6%, and 10.1% comprehensive care retirement villages.

10.57 As the COVID-19 risk continues, Summerset has procedures in place in its villages (which would include the Project) to ensure its residents are safe given their vulnerability to complications from the virus.

10.58 The Project would contribute to increasing the safety of its residents and reducing the wider crime rate by reducing the real and perceived risk of crime to its residents, using "Safety in Design" principles and reducing the risk of road accidents involving the elderly.

10.59 At a more local level, access along the Waimeha Stream will be enhanced as a result of the Project, through the proposed vesting of an area of the Site and provision for pedestrian access through this portion of the Site. In addition to this area, the Project identifies additional areas of reserve land that could be vested in the Council allowing for public access and improving connectivity which aligns with the intent of the Ngārara Structure Plan. Initial

discussions with the Council have commenced in this regard and would be completed following the granting of consent.

Whether there is potential for the project to have significant adverse environmental effects

10.60 There is no potential for the Project to have significant adverse environmental effects. As outlined in section 8 above, adverse effects will be avoided, remedied or mitigated. To the extent that effects on the wetlands cannot be avoided, remedied or mitigated, comprehensive offsetting will be provided to ensure that there is no net loss of wetland habitat. Summerset will be proposing conditions that will appropriately address these effects.

11. CLIMATE CHANGE AND NATURAL HAZARDS

11.1 Climate change effects such as an increase in extreme weather events including storms are taken into account in the design and development of Summerset villages. The GWRC flood hazards GIS map indicates that most of the Site has a low flooding risk but some lower lying areas adjacent to the Waimea Stream in the south-west corner of the Site have an Annual Exceedance Probability modelled at 1%.[17]

11.2 As set out at paragraph 10.52 freeboard is provided for the Project in accordance with the NZ Building Code, owing to accessibility requirements for older residents preventing a higher allowance. The primary stormwater network will be capable of conveying the 10-year average return interval ("**ARI**") (plus climate change) storm events, with a secondary network for flows that exceed the primary network capacity and stormwater basins to attenuate peak discharges up to the 100 – year ARI (plus climate change).[18]

11.3 The GWRC GIS data maps the Project Site as having a moderate ground shaking hazard, this has been taken into account in the assessment provided by Beca in its Geotechnical Interpretive Report undertaken in September 2019.

12. TRACK RECORD

12.1 The broader Summerset group prides itself on its environmental record of compliance across its developments. The Summerset Group has not been the subject of any environmental prosecution. s 9(2)(b)(ii) [redacted]

17 Geotechnical Interpretive Report, dated 12 September 2019 at 6.1.7. Further detail from this report can be provided on request.

18 Stormwater Management Plan, dated 8 April 2020. Further detail from the Stormwater Management Plan can be provided on request.

s 9(2)(b)(ii)

[redacted]