



DATE 17 August 2022

TO SAMANTHA MAXWELL

s 9(2)(a)

JESS HOLLIS

s 9(2)(a)

[SENT VIA EMAIL]

FROM STEPHANIE BLICK

s 9(2)(a)

s 9(2)(a)

Dear Samantha and Jess,

WAIKANAE NORTH REFERRAL APPLICATION: REQUEST FOR FURTHER INFORMATION

1. INTRODUCTION

This letter seeks to respond to the requests for further information made by the Ministry for the Environment ("MfE") on the 3rd of August. For completeness, responses to each of the points are provided in the following section. In addition, based on further discussions with both Kapiti Coast District Council ("KCDC") and Greater Wellington Regional Council ("GWRC"), a number of other clarifications have been provided. These are detailed in the "Other Matters" section below.

This response is accompanied with the following information:

- Revised scheme plan
- Stream reclamation memorandum
- Cuttriss RFI response letter

2. FURTHER INFORMATION

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

2.1 EASEMENT RESTRICTIONS

1. The record of title (WN54D/269) for 99 State Highway 1, is subject to a number of interests, including easement B742932.6 and B742932.7. It is noted that easement B742932.6 in favour of Horowhenua

Energy Limited appears to relate to existing overhead electricity lines that extend across proposed Lots 302 and 172 and the proposed road to vest, however the application does not contain any details on this nor on consultation undertaken to date with Horowhenua Energy Limited. Please provide further details of the easements, any consultation undertaken to date in relation to them, and advise whether they will potentially prevent, limit or delay project delivery.

RESPONSE:

Electra have been consulted with respect to the design of electrical infrastructure to serve the proposed development. Electra have confirmed the existing overhead electrical lines will remain and the existing easements will be transferred onto the subdivided lots and in the case of the road, surrendered so the road can vest unencumbered.

Electra have also provided a layout for the electrical design of the subdivision. This plan will be included in the fast-track consent application should the referral be approved.

2.2 STORMWATER

2. The application states that the project will discharge stormwater to a new piped network that will discharge to the existing reticulated network and that the project engineers have confirmed the site can be adequately serviced for stormwater disposal. However no commentary is provided on stormwater in the infrastructure report prepared by Cuttriss, and submitted with the application. Please provide additional supporting information relating to stormwater management and disposal, in particular:

- a. confirmation from the project engineers of any required stormwater infrastructure upgrades (on and off the site), and their timing, to support the project*
- b. comment on proposed funding for any required stormwater infrastructure upgrades to support the project, e.g. will funding be met in full by the applicant, provided by Kapiti Coast District Council or other third parties*
- c. whether alternative funding arrangements, if required, are likely to impact on the proposed construction timeline.*

RESPONSE:

Refer response provided by project engineers, Cuttriss Consulting. They advise that:

The development will be hydraulically neutral. Any additional stormwater generated from the development will be managed on site and will be either disposed of in suitably sized soakpits or attenuated in suitably sized stormwater ponds and/or tanks. Attenuated stormwater will be discharged into the existing network at a rate no greater than what is currently discharged off site and therefore we do not anticipate any upgrades will be required to existing stormwater infrastructure. Funding of all new infrastructure on site will be by the developer.

Therefore, no off-site upgrade works will be required to support the proposed development and KCDC will not be required to pay for the on-site stormwater management infrastructure.

Preliminary stormwater modelling has been undertaken by WSP Opus to confirm suitability of the site for stormwater disposal and full stormwater modelling will be undertaken by AWA (KCDC and Wellington Water Limited's stormwater advisors and modellers) as part of the fast-track consent if the referral is approved. The additional modelling will reconfirm the size of the proposed attenuation tanks and sizing for on-lot tanks.

2.3 WATER SUPPLY

3. The application details that the project engineers have confirmed the site can be adequately serviced for water supply. However, the detail provided in the infrastructure report prepared by Cuttriss only refers to the requirements for the adjacent Manu Park development and does not address water supply capacity for the project. Please provide additional supporting information relating to water supply, in particular:

- a. confirmation from the project engineers of any required water supply infrastructure upgrades (on and off the site), and their timing, to support the project
- b. comment on proposed funding for any required water supply infrastructure upgrades to support the project, e.g. will funding be met in full by the applicant, provided by Kapiti Coast District Council or other third parties?
- c. whether alternative funding arrangements, if required, are likely to impact on the proposed construction timeline.

RESPONSE:

Refer response provided by project engineers, Cuttriss Consulting. They advise that:

The Stantec report modelling completed for Manu Park modelled future peak scenarios to 2047 based on anticipated growth in Waikanae. We can confirm that water supply infrastructure upgrades will be required off site. These infrastructure upgrades may include one of the two options indicated in the Stantec report, attached. Further modelling will be necessary to confirm the exact upgrades required. Our full suite of resource consent application information will include further modelling and concept design of upgrades required.

The upgrade will need to be timed to be completed to service the development of the Waikanae North site and therefore will need to be implemented to provide water supply to the development.

The funding of this infrastructure upgrade will be either confirmed in a developer's agreement which shares the cost between the developer and KCDC, or it will be funded by the developer.

Funding of all new infrastructure onsite will be by the developer.

Cuttriss have discussed the servicing options with relevant KCDC staff where it is understood that there is general agreement that the specific detail of the upgrades will be determined through detailed design as part of the fast-track application should the referral be approved.

If the servicing solution requires funding from the KCDC and developer it is likely this will be agreed through a Development Agreement. The Cuttriss has significant experience with land development projects in the Kapiti Coast district whereby funding was agreed via such a mechanism. It is therefore considered that the design, timing and funding of a water supply solution will not impact on the proposed construction timeline.

2.4 STREAM RECLAMATION

- 4. *The ecological assessment prepared by WSP New Zealand Limited (WSP), and submitted with the application, identifies four unnamed streams on the site and assumes (section 5.7), and recommends (section 6.4) that all streams will be fenced and planted. However, the project description refers to 'stream reclamation' and we anticipate that this will likely need to occur to give effect to the project as currently proposed. Please provide the following information:*
 - a. *clearly identify the streams, or parts of, that will be reclaimed/infilled as part of the project*
 - b. *confirm whether consent is required under clause 57 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 for the proposed reclamation*
 - c. *confirm whether consent is required under the relevant regional plan/s for the proposed reclamation and provide an updated assessment of effects in relation to the proposed reclamation (noting that this was not anticipated in the ecological assessment prepared by WSP)*
 - d. *provide further assessment against the objectives and policies of the National Policy Statement for Freshwater Management 2020, specifically in relation to the proposed reclamation, and Policy P102 - avoiding the loss of extent and values of the beds of rivers - of the Proposed Natural Resources Plan for the Wellington Region (Appeals Version).*

The proposal has sought to avoid reclamation to the greatest extent possible through the careful design of roading, residential lots and open space. However, full avoidance has not been possible.

It is acknowledged that there is a discrepancy between the ecological assessment prepared by WSP and the proposed scheme plan. There is a small portion (95m) of “*unnamed Stream 2*” that is proposed to be reclaimed in order to implement the medium density area of the development and a small portion (92m) of “*unnamed Stream 4*” that will be piped to construct the entry road. In total, 187m of the 1,044m streams on site are proposed to be reclaimed. On-site offset on the Waimeha Stream is proposed as illustrated on the revised scheme plan (**refer attached**). There is also an ephemeral stream on the site that is proposed to be reclaimed. This is not subject to any rules of the NES-F or NRP as it does not fall under the RMA definition of river.

The total reclamation on site of 187m doesn't account for the daylighting of streams that is proposed via the removal of culverts. In the Waimeha Stream there are a number of culverts, that currently impede fish passage, that will be removed. The new culvert that is proposed within the Waimeha Stream will be a replacement of an existing culvert in generally the same location.

Streams 2 and 4 are identified on GWRC maps as a “*highly modified watercourse*” and are both manmade drains dug by the previous owner. WSP have summarised the value of the unnamed streams as low and included the following concluding comments:

The Unnamed Streams within the property boundary are all heavily modified. There is little in the way of riparian vegetation, no fencing and there is evidence of stock accessing the streams in recent times. Culverts found in some of the Unnamed streams appear to be a barrier to fish passage. Further, Unnamed Streams in the property are largely soft-bottomed and culverts appear to be blocked by sediment and weeds. In their current state the Unnamed Stream habitat is considered of low ecological value.

For context, it is noted that WSP were engaged by Kainga Ora to provide an ecological assessment to support the agencies due-diligence programme, and to assist in informing the referral application process. Kainga Ora authorised the use of the WSP Ecological Assessment for the referral application.

Thames Pacific have a wider consultant team that have undertaken site assessments and who will undertake further assessment and detailed design work, should the referral application be approved. In this regard, Treffery Barnett, Senior Ecologist – Coastal and Freshwater from Bioresarches has been providing ecological advice on the project.

The proposed reclamation and associated offsetting were assessed by Ms Barnett and a memorandum prepared to satisfy MfE's RFI (**refer attachment**). The purpose of the assessment was to determine the feasibility of stream offset on-site for the proposed reclamation of a modified stream.

In her assessment Ms Barnett has applied the principles for aquatic offsetting within the exposure draft document for the National Policy Statement for Freshwater Management (NPS-FM).

Ms Barnett has assessed the requirements for off-setting based on the Stream Ecological Valuation (SEV) methodology combined with the calculation of the Environmental Compensation Ratio (ECR). Ms Barnett notes that this is a transparent, well-recognised methodology for calculating the quantum of offset required for stream loss.

Table 1 of Ms Barnett's assessment presents the estimated SEV values calculated from the WSP Ecological Report and data from the site surveyor, to inform the feasibility of on-site stream offset. Using these figures and the ECR equation, the total length of the Waimeha Stream required to offset the loss of Stream 2 and part of Stream 4 is 168m. As this is less than the total length of stream loss, this stream length, as required by the methodology to increase to the total length of stream loss i.e. 187m. As noted above, the scheme plan has been revised to illustrate the extent of off-setting that is proposed (**refer attachment**).

In summary, Ms Barnett has assessed that, in order to offset the loss of streams as proposed on the site, riparian planting 10m either side of 186m of the Waimeha Stream would be required. As the 342m of the Waimeha Stream is available for offset on the site, this leaves a residual of 156m of the Waimeha Stream to account for any changes in the input data, from future field surveys.

Ultimately, Ms Barnett concludes that:

All of the streams on 99 -103 State Highway 1, Waikanae are highly modified, rural streams with very low ecological values. Reclamation and piping of 168m of streams on the site is proposed. Using the site data from the ecological surveys carried out in May 2022, augmented by data from the site surveyor, the quantum of stream offset was estimated using the Stream Ecological Valuation (SEV) methodology combined with the calculation of the Environmental Compensation Ratio (ECR) methodology. Offsetting the loss of the two stream reaches by riparian planting 10m either side of 186m the Waimeha Stream will offset the stream loss. This leaves a residual of over 150m to account for any refinement in the calculations once field surveys are performed, as well as over 670m of additional stream length on the site.

CONSENT REQUIREMENTS

The proposed reclamation will require resource consent under the following rule of the NES-F:

- **Clause 57:** Reclamation of the bed of any river (Discretionary Activity)

And the following rule of the Natural Resources Plan ("NRP").

- **Rule R129:** All other activities in river and lake beds (Discretionary Activity)

The proposal is not subject to non-complying activity rule R127 of the NRP as the stream is not identified in Schedule A1, Schedule A2 or Schedule C.

If the referral information is approved, the fast-track consent application will cover all of the information requirements associated with the above rules.

UPDATED ASSESSMENT OF EFFECTS

LOSS OF STREAM HABITAT

As outlined in this response 187m of stream reclamation is proposed. To offset the loss of stream habitat, the scheme plan has been revised to include offset planting along the length of Waimeha Stream. In some areas the buffer extends the 10m width recommended by Ms Barnett. The proposal also includes the construction of a culvert within Waimeha Stream to provide road access and the removal of existing culverts and streams. Through the removal of these culverts and structures from the stream, together with the proposed planting, stream habitat will be restored.

As identified in the Ecological Assessment prepared by WSP, the Waimeha Stream and a number of tributaries bisect the site. The WSP Ecological Assessment, together with Ms Barnett's memorandum has assessed the freshwater values of the site as low.

Works proposed within the Waimeha Stream include the daylighting of portions of the stream via the removal of culverts that also currently impede fish passage, the construction of a new culvert generally in the same location as an existing culvert to create a road connection to the proposed allotments in the north-western corner of the site, and riparian planting as illustrated on the revised scheme.

Also as part of the Project minor reclamation works are proposed, being 187m of the 1,044m length of highly modified watercourses on the site. In developing the scheme, the project team tested a number of options to lessen the extent of reclamation to the greatest extent possible. This included realigning the proposed roading, realigning allotments, and removing allotments where streams are located, including along the western boundary where Stream 3 is located. As noted, there is only a small extent of modified low-value streams that are proposed to be reclaimed.

In assessing the potential adverse effects of the reclamation and the level of offsetting that would be required to offset / mitigate such effects, the project ecologist applied the principles for aquatic offsetting within the exposure draft document for the NPS-FM. The principles include adherence to the effects mitigation hierarchy.

In terms of avoidance, as noted, the design has been refined to avoid stream reclamation to the greatest extent practicable. In this regard, 857m of the 1,044m of watercourses on the site have been avoided (as well as all of the identified wetlands). However, as full avoidance has not been achieved, the permanent loss of stream length is an effect that requires assessment. With regard to this loss of habitat, Ms Barnett completed a preliminary SEV assessment, which is the primary method that is used to assess offsetting / compensation for the loss or degradation of stream environments. To offset the slight reduction in stream length across the site, the SEV assessment found that 187m of riparian planting along Waimeha Stream is necessary.

As illustrated on the revised scheme plan, riparian planting is proposed along the majority of the Waimeha Stream – much greater than was required under the SEV. In addition, culverts and structures that currently impede fish passage are proposed to be removed and these portions of the stream 'daylighted' to restore stream habitat.

As part of the future resource consent application if the referral is approved, a planting plan will be prepared set out the maintenance requirements for the planted areas of the riparian corridor and wetland ponds. Additional monitoring following a storm event or after prolonged dry or wet periods will also be proposed.

In summary, to compensate for the loss of stream habitat, offsetting has been proposed and the project ecologist has concluded there is sufficient opportunities within the site to enhance ecological values. The offsetting areas identified on the revised scheme plan extend the extent considered necessary by Ms Barnett to offset the loss of portions of Stream 2 and Stream 4.

Specifically, regarding the proposed offsetting to Waimeha Stream, Ms Barnett has noted:

On-site offset on Waimeha Stream is proposed for the loss of 95m of Stream 2 and the piping of 92m of Stream 4. The current ecological values of Waimeha Stream are low, but with good design, planting plans, maintenance and pest control Waimeha Stream would rapidly show a net gain in ecological values, show additionality (through fencing and buffering of nearby wetland habitats), is appropriate in the landscape and have the long-term potential to link larger ecosystems and or create extensive riparian corridors.

In short, the compensation that is proposed exceeds what is required by the calculated SEV model. When viewed in conjunction with the other aspects of the Project including stream enhancement works, the adverse effects of the stream works can be adequately mitigated and compensated. In addition, the planting will not only provide for an enhanced natural environment through habitat values, but it will also result in a high level of amenity for people enjoying streamside reserves. Overall the planting and restoration is considered to be a benefit to the wider area through an enhanced freshwater environment.

EFFECTS ON FISH PASSAGE

As noted, the Project includes the removal of culverts and structures from the Waimeha Stream as well as the construction of a new culvert in this stream. As required by the information requirements of the NES-F, fish habitat design will be incorporated into the final design of the culvert structure. In addition, monitoring for the success of fish habitat be undertaken.

On balance, it is considered that the Project will result in positive effects with respect to fish passage given that culverts that currently impede this will be removed and stream beds reinstated to create suitable habitat.

EFFECTS ON STREAM ECOLOGY

In relation to potential stormwater and sediment control effects on the on-site watercourses, the likelihood of the failure of sediment and erosion controls during high rainfall events is low. Given the low likelihood of such an occurrence given adherence to applicable KCDC and GWRC erosion and sediment control guidelines, such effects will likely be low. This will be outlined in the Ecological Assessment that will accompany the resource consent application if the referral is approved.

Potential effects on aquatic fauna (that have been assessed as low) may stem from discharge events, though unlikely. Appropriate site management techniques can sufficiently mitigate the risk of such events occurring and this will be detailed in an Environmental Management Plan ("EMP") that will be provided with the resource consent application.

The proposed stormwater attenuation areas on the site as well as on-site rain tanks will ensure that stormwater flows to existing watercourses do not increase and that overland flow does not discharge directly to the streams. A Stormwater Management Plan ("SMP") will also be prepared in support of the application and will address potential effects on the site and outline the approach to stormwater management. The resource consent will proffer a consent condition that requires implementation of and adherence to the SMP.

SUMMARY

In summary, given the measures proposed, including offsetting the loss of stream habitat, there is no potential for the Project to have significant adverse environmental effects on the ecological values of the site. On the contrary, the works proposed seek to enhance ecological values (including freshwater values) of the site. Regarding potential effects of the proposed development on the retained watercourses, adverse effects will be avoided, remedied or mitigated and any residential effects will be readily managed through proffered conditions in the future application.

OBJECTIVES AND POLICIES

Please refer **Table One** below for an assessment of the proposal against the objectives and policies of the NPS-FM and Policy P102 of the PNRP.

TABLE ONE: OBJECTIVE AND POLICY ASSESSMENT		
REQUIREMENT		COMMENT
NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT		
Objective (1)	<p>The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:</p> <p>(a) first, the health and well-being of water bodies and freshwater ecosystems</p> <p>(b) second, the health needs of people (such as drinking water)</p> <p>(c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.</p>	This objective is given effect to through the policies. Refer assessment below.
Policy 1	Freshwater is managed in a way that gives effect to Te Mana o te Wai	<p>The NPS-FM specifies that Policy 1 is given effect to by Regional Councils through engagement with communities and tangata whenua to determine how Te Mana o te Wai applies to water bodies and freshwater ecosystems in the region.</p> <p>Policy 1 is therefore not directly applicable to the proposal. Irrespective, Ātiawa ki Whakarongotai (Ātiawa) have been consulted with in respect of the development and the proposal has been designed in such a way as to, the greatest extent practicable, avoid direct effects on adjacent waterbodies, wetlands or the downstream receiving environment and to minimise effects the works which relate primarily to the control of stormwater and sediment. Resultingly the health of</p>

TABLE ONE: OBJECTIVE AND POLICY ASSESSMENT		
REQUIREMENT		COMMENT
		<p>freshwater will be protected in a manner consistent with Te Mana o te Wai.</p> <p>The Applicant is aware that Kapiti Coast District Council, together with mana whenua have prepared a Stormwater Management Framework that outlines Te Mana o te Wai principles. The final stormwater management solutions for the site will adhere to the principles, guidelines and recommendations of this document.</p>
Policy 2:	Tangata Whenua are actively involved in freshwater management (Including decision – making processes), and Maori freshwater values are identified and provided for.	Conversations with Ātiawa regarding involvement in freshwater management and ecological restoration works in the wider development will continue throughout the development.
Policy 3:	Freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects of receiving environments.	<p>Part 3 of the NPS-FM, 'Implementation', notes in respect of integrated management that:</p> <p><i>Adopting an integrated approach, ki uta ki tai, as required by Te Mana o te Wai, requires that local authorities must:</i></p> <p><i>(a) recognise the interconnectedness of the whole environment, from the mountains and lakes, down the rivers to hāpua (lagoons), wahapū (estuaries) and to the sea; and</i></p> <p><i>(b) recognise interactions between freshwater, land, water bodies, ecosystems, and receiving environments; and</i></p> <p><i>(c) manage freshwater, and land use and development, in catchments in an integrated and sustainable way to avoid, remedy, or mitigate adverse effects, including cumulative effects, on the health and well-being of water bodies, freshwater ecosystems, and receiving environments; and</i></p> <p><i>(d) encourage the co-ordination and sequencing of regional or urban growth.</i></p> <p>While directive to local authorities, the Project is consistent with this policy insofar as it has been designed and planned in an integrated manner, recognising potential impacts of the proposal on water quality in the receiving environment and implementing appropriate measures to avoid and minimise such impacts. These include avoiding direct impacts on waterbodies to the greatest extent practicable, undertaking ecological enhancement works in the form of removing culverts and daylighting streams, employing a range of management techniques relating to the control of erosion and sediment discharges from earthworks in order to maintain freshwater quality, and the proposed use of rain tanks and attenuation ponds to control stormwater quality and discharge rates to ensure freshwater is not adversely affected by stormwater from the site.</p>

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REQUIREMENT		COMMENT
Policy 4:	Freshwater is managed as part of New Zealand's integrated response to climate change.	The Project been designed to achieve hydraulic neutrality and the design of the stormwater system for the site will take into account climate change impacts. In addition, the stormwater system has also been designed to mitigate flood risk on site to ensure that flood risk downstream of the site is not exacerbated. Therefore, the proposal will not impact public stormwater infrastructure.
Policy 5:	Freshwater is managed through a National Objectives Framework to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved.	<p>This policy is not considered to be directly relevant to the Project. The policy requires regional councils to go through a comprehensive process of identifying Freshwater Management Units (FMUs), identify their values, set environmental outcomes for each value and include them as objectives in regional plans, identify attributes for each value and set baseline states for those attributes, set target attribute states, environmental flows and levels, and other criteria to support the achievement of environmental outcomes, set limits as rules and prepare action plans to achieve environmental outcomes.</p> <p>Notwithstanding that the policy is not directly applicable, it is noted that the ecological values of the wetlands and the watercourses on the site have been identified as low. The Project will have the positive effect of ensuring that these wetlands will retained and, that their condition is monitored. In addition, as described in the memorandum prepared by Ms Barnett, there are significant offsetting and ecological enhancement opportunities on the site. In the future ecological assessment, the potential effects on the wetlands and watercourses on the site will be addressed through the effects management hierarchy.</p>
Policy 6:	There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	<p>The identified wetland areas been thoroughly considered in the design of the Project and the subdivision design ensures that the extent of wetlands on the site will not reduce.</p> <p>Potential effects related to these wetlands relate to earthworks in their proximity and the diversion of additional water into these areas in storm events. Physical works have been designed to avoid these areas directly. There will be no earthworks within the wetlands, they will not be drained and as a result the works will not result in a loss of wetland extent. Moreover, the effect of the proposal on these wetlands will be positive in that it will retain these wetlands, and ensure their viability into the future where otherwise they may not survive without intervention if the current farming practices on site were to remain. Accordingly, there will be no loss of natural wetlands, their current decline will be halted, and their condition will be monitored as a result of the Project. Therefore, the proposal is consistent with this policy.</p>
Policy 7	The loss of river extent and values is avoided to the extent practicable.	As noted, through careful subdivision design the loss of river extent and values has been avoided to the greatest

TABLE ONE: OBJECTIVE AND POLICY ASSESSMENT		
REQUIREMENT		COMMENT
		<p>extent practicable. As full avoidance of the loss of stream extent has not been possible, offsetting requirements have been assessed by Ms Barnett.</p> <p><i>On-site offset on Waimeha Stream is proposed for the loss of 95m of Stream 2 and the piping of 92m of Stream 4. Ms Barnett concludes that:</i></p> <p><i>The current ecological values of Waimeha Stream are low, but with good design, planting plans, maintenance and pest control Waimeha Stream would rapidly show a net gain in ecological values, show additionality (through fencing and buffering of nearby wetland habitats), is appropriate in the landscape and have the long-term potential to link larger ecosystems and or create extensive riparian corridors.</i></p> <p>In addition, there is over 150m of the Waimeha Stream and 670m of other low ecological value streams that can be enhanced as part of the Project in order to enhance the overall ecological and freshwater values of the site.</p> <p>The revised scheme plan includes offsetting to the majority of the banks of Waimeha Stream and, in many places, this exceeds the 10m width recommended by Ms Barnett.</p> <p>On the basis of the updated effects above, it is considered that, with the compensation / offsetting proposed, stream values on the site will be enhanced.</p>
Policy 9:	The habitats of indigenous freshwater species are protected.	As outlined in the WSP report, the unnamed tributaries on the site do not support indigenous freshwater species. Further, enhancement works to the Waimeha Stream will ensure the habitats within this stream are not only protected, but enhanced.
Policy 12:	The national target (as set out in Appendix 3) for water quality improvement is achieved.	This policy is not directly applicable to the Project. However, the proposal seeks to maintain the water quality of the site watercourses, wetlands and downstream receiving environment through appropriate site management measures relating to the management of stormwater, erosion and sediment effects. This will include the use of over-sized sediment retention ponds and decanting earth bunds.
Policy 13	The condition of water bodies and freshwater ecosystems is systematically monitored over time, and action is taken where freshwater is degraded, and to reverse deteriorating trends.	This policy is not directly applicable to this Project as the requirements of the policy are directed at the Regional Council. However, as required by the NES-F, the Project will include the implementation of a monitoring regime, that would monitor the effects of the proposal on the wetlands and watercourses on the site. This will be volunteered as a condition in order to appropriately address any relevant effects of the proposal.
Policy 14	Information (including monitoring data) about the state of water	Any requirement to monitor environmental outcomes on the site, would be secured by a condition of consent, and

TABLE ONE: OBJECTIVE AND POLICY ASSESSMENT

REQUIREMENT		COMMENT
	bodies and freshwater ecosystem, and the challenges to their health and well-being, is regularly reported on and published.	such monitoring data would be provided to the Council(s). Such an outcome is consistent with and would support this policy.
Policy 15:	Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with National Policy Statement.	The Project would allow for a sector of the community to provide for their social and economic wellbeing, as well as providing a wider economic benefit to the community as a whole with respect to providing additional housing supply within a constrained housing market.

NATURAL RESOURCES PLAN (DECISIONS VERSION)

Policy P102	<p>Policy P102: Reclamation or drainage of the beds of lakes and rivers</p> <p>The reclamation or drainage of the beds of lakes and rivers and natural wetlands shall be avoided, in particular those identified in Schedules A (outstanding water bodies) and C (mana whenua), except where the reclamation or drainage is:</p> <p>(b) partial reclamation of a river bank for the purposes of flood prevention or erosion control, or</p> <p>(c) associated with a growth and/or development framework or strategy approved by a local authority under the Local Government Act 2002, or</p> <p>(c) necessary to enable the development, operation, maintenance and upgrade of regionally significant infrastructure, or</p> <p>(d) associated with the creation of a new river bed and does not involve piping of the river, and</p> <p>(e) for the purpose of forming a reasonable crossing point, and</p> <p>(f) in respect of (a) to (e) there are no other practicable alternative methods of providing for the activity, or</p> <p>(g) the reclamation or drainage is of an ephemeral flow path.</p>	<p>The site is identified in two growth strategies (being the KCDC Growing Well strategy and the Regional Growth Framework) that were approved under the Local Government Act. In addition, the proposed piping of stream 4 is required to create a 'reasonable crossing point' for access to the north-western portion of the development.</p> <p>In developing the scheme, the project team tested a number of options to lessen the extent of reclamation to the greatest extent possible. This included realigning the proposed roading and removing allotments along the western boundary where stream 3 is located. The final scheme includes only a small extent of streams that are proposed to be reclaimed, being 187m of the 1,044m of watercourse on the site. In assessing the level of offsetting proposed, the Ms Barnett applied the principles for aquatic offsetting within the exposure draft document for the NPS-FM. The principles include adherence to the effects mitigation hierarchy.</p> <p>In terms of avoidance, the design has been refined to avoid stream reclamation to the greatest extent possible. In this regard, 857m of the 1,044m of watercourses on the site have been avoided (as well as all of the identified wetlands). As full avoidance has not been achieved offsetting has been proposed where the project ecologist has concluded there is sufficient opportunities within the site to enhance ecological values. In addition, mitigation is proposed by way of erosion and sediment and stormwater management measures to ensure the freshwater values of the retained watercourses are enhanced.</p> <p>It is also acknowledged that the Project enables and provides for the enhancement of freshwater values on the site from what currently occurs via previous and current farming practices. Proposed works include the removal of culverts to daylight streams to enable fish passage that will be supported by improved stream habitats created via the offset planting.</p> <p>On this basis it is considered that the Project is not contrary to this policy.</p>
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3. OTHER MATTERS

In addition to the responses above, the Applicant would like to make a number of clarifications as a result of further consultation with both KCDC and GWRC.

3.1 REGIONAL GROWTH FRAMEWORK

The Wellington Regional Growth Framework is a spatial plan that has been developed by local government, central government and iwi partners in the Wellington-Horowhenua region to provide councils and iwi in the region with an agreed regional direction for growth and investment, and deliver on the Urban Growth Agenda objectives of the Government.

The Project site is in Waikanae North that has been identified as a 'Future Urban Area' in all of the spatial plans and diagrams in this report. Refer example in **Figure One** below.



FIGURE ONE: REGIONAL GROWTH FRAMEWORK FUTURE URBAN DEVELOPMENT AREAS

Therefore, together with KCDC's Growing Together growth strategy document, there is an acknowledged that the site is part of an area identified as being appropriate to accommodate urban development to support the growth of both the district and the region.

3.2 NEIGHBOUR CONSULTATION

The Project site was the subject of a subdivision that separated the development block from an existing house. It is unclear how such a subdivision occurred given that the house lot is a lot less than the minimum lot size under the current zoning.

The existing house is now held in a separate lot with access to the house provided via a Right of Way. Refer **Figure Two** below.

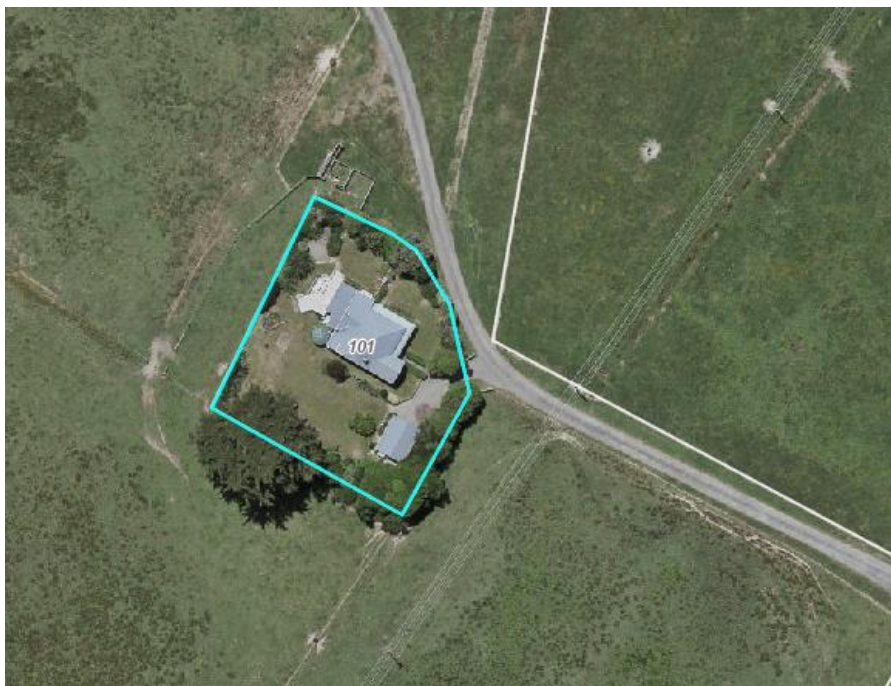


FIGURE TWO: ADJACENT ALLOTMENT

As illustrated in the application drawings, the existing house will be accessed via the new internal road generally in the same location as the existing driveway. Access via the new road removes the requirement for the Right of Way easement.

The house lot was sold generally around the same time as the Project site was sold as a development site. Thames Pacific have had a number of conversations with the owner of the house lot who have expressed a desire to sell their lot to them. These discussions are ongoing, and should the allotment be purchased by Thames Pacific, this allotment does not need to form part of the future development if this is not possible through the fast-track process. In other words, the development has been designed in such a way that the proposal can be implemented irrespective of whether Thames Pacific purchase this allotment or not. In addition, due consideration has been given to the amenity of this existing property.

3.3 INTERFACE WITH ECOLOGICAL SITE

The Applicant has identified the ecological site on the site as a significant asset that will enhance the amenity of the proposed development. As illustrated on the proposed development, sufficient space has been provided between the proposed roading and the eco-site to provide a suitable interface with the development. There is

also sufficient width between the eco site and the proposed medium density area to implement a suitable interface with appropriate connections and surveillance. It is likely this will be in the form of a path alongside 'unnamed stream 3' that will likely be enhanced as part of the proposal.

The Applicant also intends on providing pedestrian and cycle connections through the site via existing tracks evident on-site aerials.

The project urban designer has identified the following elements of the proposal that will be further considered in the fast track application:

- a subdivision pattern that promotes visual and physical connections to adjacent passive open spaces
- active interfaces with passive open spaces, promoting surveillance and safety

We trust the above information satisfies your requests, however please do not hesitate to contact me should you require any further clarification.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'SBlick', followed by a period.

Stephanie Blick

SCOPE PLANNING LIMITED