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ref: Bean/23333

16 September 2024

Megan Barr
Consultant Planner
Kāpiti Coast District Council

By Email to: megan.barr@kapiticoast.govt.nz

Dear Megan,

RM240112 – RESPONSE TO SECTION 92 FURTHER INFORMATION REQUEST

In response to your Section 92 Further Information Request dated 26 August 2024 and the subsequent meeting 05 September 2024, we have reviewed the points raised (set out below) and would like to submit the following further information:

Development Engineering

1. *Please update the application plans and data to the NZVD 2016 Vertical Datum, which was adopted by Council on 1 July.*

As discussed at the 05 September meeting, at the time of designing this project, Council's updated flood data was not available in NZVD16 and the preparations of plans were underway prior to Council's datum switch so the 1953 datum was used.

We understand Council's concern with having the entirety of the consent in one datum, as such the Scheme Plan has been converted to the NZVD16 Vertical Datum.

2. *Please clarify whether Lidar data or Total Station data have been used to establish topographical survey, as it is not adequate for stormwater ponding assessments and earthworks quantities.*

A detailed site survey was undertaken using drone and GPS surveying methods, which is entirely suitable for stormwater and earthworks design.

3. *Please provide details of project staging together with relevant measures to ensure that each stage is self-sufficient and can operate in isolation from other following stages.*

Staging is not strictly proposed by the application, so a staging plan has not been prepared. The construction of the loop road and installation of services will be undertaken at one time (i.e. Stage 1). However, the applicant is seeking flexibility in staging s224(c) certificates if required as the units are constructed (i.e. Stages 2+). Any request for staging must ensure that the stage can stand on its own, with the standard proffered condition which has been accepted by Council in the past, and is commonly accepted by other Council's in the region, ensures that any request for staging must

ensure that the stage can be self-sufficient and is provided legal and physical access, serviced and have paid the appropriate development contributions – all of which will need to be demonstrated when certification is sought pursuant to s223 and 224(c).

4. *For Information: Council does not accept draft CEMPs at resource consent stage. In addition, the content of the document provided is less than required by Council's standard conditions. A draft CEMP to be provided at Engineering Approval (Detailed Design) is acceptable, with a final CEMP to be provided at least 40 working days prior to construction starting.*

Noted. The Preliminary CEMP was not intended to be conditioned, but rather to aid in understanding likely construction effects and how these are managed on site, it has not been provided for engineering certification at this stage. As discussed at the meeting, we anticipate providing a further Draft CEMP for engineering approval at detailed design stage, with the final CEMP being provided 10 working days prior to works commencing, once tenders have been put out and contractors have been appointed. The final approval of the CEMP will provide the inclusion of contact details of the contractor appointed and all other matters will have been addressed at the engineering approval stage.

5. *For earthworks, please provide a topographical plan showing the existing and finished final ground levels to help identify existing drainage patterns and the accurate depths of cut and fill areas*

The proposed and existing contours have been overlain on Sheet 3 of the Scheme Plan.

6. *For earthworks, the application suggested LDMR Parts 3C and 4 Schedule 2 apply. However, KCDC also require NZS4404 Parts 1 and 2, although mentioned also within LDMR.*

Noted, the proposal will also comply with NZS4404 Parts 1 and 2. Happy to accept this as a condition of consent.

7. *Please provide a revised geotechnical report including comment on / recommendations for the utilities and private right of way.*

The report prepared by Torlesse assesses the requirements of the whole site and makes recommendations for site-wide filling in accordance with NZS4404:2010 and NZS4431:2022. These recommendations will inevitably cover both dwelling foundation areas, road network areas and subsequently service corridors given the methodology in which the site will be earthworked. The report does not specifically comment on 'Utilities' or 'Right of Way' as such but is covered under the wider recommendations of the report. Outside of fill / re-worked areas the installation of services and construction of the roading network will be in accordance with NZS4404:2010 and as amended by the LDMR following local standard design and installation practices. We believe the report's findings and recommendations provided are satisfactory for Resource Consent.

8. *Please provide a combined utilities plan showing all utilities with street lighting (for the private right of way) included. Please provide typical sections at critical locations to ensure that sufficient spacings can be provided between utilities and that there is sufficient private right of way width to accommodate all utilities.*

Please refer to the attached Lighting Plan. A typical trench detail has been shown on Sheet 11 of the Scheme plan to demonstrate separation between services.

9. *Please provide an assessment of how the proposed earthworks within Niu Sila Way properties will affect hydraulic neutrality within these sites.*

The area of works within Niu Sila Way is currently a grassed strip, the proposal includes filling this area which will be re-grassed. Thus, there is no change in permeability and hydraulic neutrality is retained. Detail A on sheet 4 of the amended Scheme Plan shows this.

Waste Minimisation

10. *Please confirm whether advice has been sought from a waste collection company about whether the private right of way and waste collection arrangements (including an 8m truck) are practicable.*

Based on our discussions with waste management providers on other developments with similar layouts, the waste collection arrangement will be practicable. Should a 10m waste management truck be required to service the site, they can manoeuvre around the site, as per the tracking for a 10.5m truck shown in Figure TR5 of the Integrated Transport Assessment and Page 13 of the lodged application.

Access and Transport

11. *Please provide clarification about the location of the three accessible parking spaces the Integrated Transport Assessment (ITA) refers to.*

TR-Table 6A requires three accessible parking spaces for the development.

Unit D typologies are accessible units, of which there are up to 11 units with on-site carparking spaces (Units 7, 23, 26 – 29, 31 – 32, 34 – 36 and 38 – 39). Each of these units has an on-site carparking space which is of suitable width and grade to constitute an accessible parking space. The guest parking spaces at the centre of the development are also of a width / grade for an accessible parking space.

It is not proposed to demarcate these parking spaces, given parking on site is largely private and associated with an individual unit. However, it is considered that the accessibility of parking supplied on site is commensurate to the proposal.

12. *Please confirm the width of the proposed heavy-duty vehicle crossing.*

The vehicle crossing is 5.8m in width. See Sheet 17 of the amended Scheme Plan.

13. *Please provide details of any lighting proposed along the common accessway and footpaths (see question 8 above).*

Please refer to the response to Point 8, and attached lighting plan.

14. *Please notate the plans to show the existing crossover to the site as to be removed and reinstated.*

Please refer to the amended Scheme Plan (Sheet 17), the vehicle crossing has been notated as being removed and reinstated.

15. *Please provide an assessment of the impacts of the proposed earthworks on the existing footpath adjacent to Mazengarb Road. What are the impacts on the existing footpath as a result of the earthworks? Will the footpath need to be removed and reinstated?*

The lodged plans showed earthworks being undertaken to the kerb – this was in error and has been amended on the Scheme Plan. The plans have been amended to show earthworks to the back of the footpath directly adjacent to Mazengarb Road. The footpath will not be impacted by the works. The curved footpath is proposed to be removed as part of the earthworks. Berm will be reinstated with grass.

Council's Access and Transport Team have confirmed that the pathway nearest the subject site does not need to be reinstated (Refer to Appendix J of the lodged application).

16. *Please update the plans to show the footpaths within the development being a consistent width and a minimum of 1.5m-1.6m wide.*

The lodged Scheme Plan showed a footpath of 1.2m in error, this has been amended. Footpaths are all 1.5m – 1.6m wide. At the in person meeting the variation between 1.5m and 1.6m wide footpaths was considered to be acceptable.

Stormwater & Coastal Assets

17. *Please note that despite the updated flood modelling referred to in the application, the site is still identified in both the District Plan Maps and Council's GIS as being subject to a ponding flood hazard.*

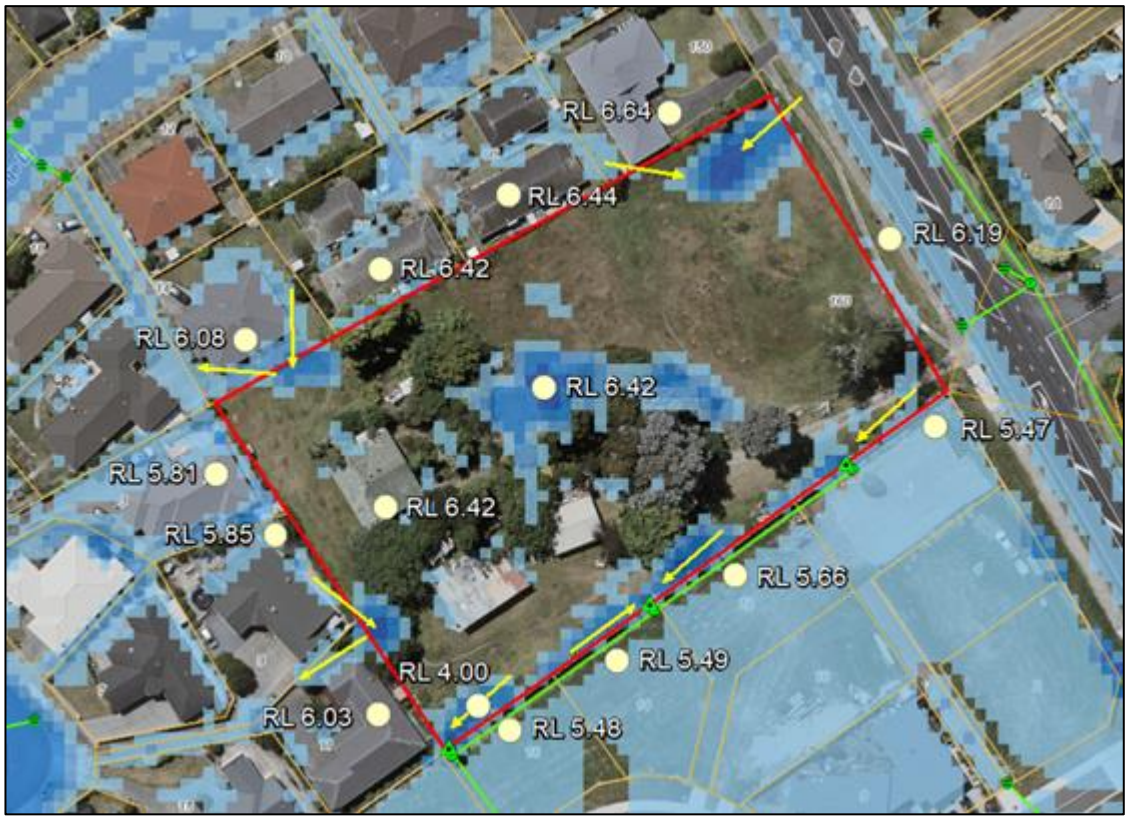
    The following comments are made on the basis of the use of the yet to be approved/released flood models.

Noted. The updated flood modelling has not yet been released for public use. However, when preparing the application we have considered that placing more weight on the most up to date flood modelling was the appropriate option, noting that an assessment against the updated models has been requested at s92 for a number of other recent projects.

18. *In order to assess the application against Policy NH-Flood-P13 and associated rules, the application has not provided information demonstrating whether the development will redirect floodwater onto adjoining sites and what those impacts might be. The earthworks plan and example as shown in Figure 13 show the land being raised in what is shown as a ponding area to a level higher than the surrounding properties therefore potentially redirecting ponding or surface flow onto properties outside the development site.*
    Please provide information demonstrating what the effects are of the land raising on both the displacement of flood waters onto adjoining properties and also impacts on natural drainage and/or surface flow from the development site to the neighbouring properties i.e. from higher land to lower land [i.e. Changing the natural servitude].

The earthworks proposed will shape all finished ground levels towards the central stormwater disposal area.

Updated flood information from Awa shows the direction of flow within the ponding areas (please disregard the levels which are in Wellington Datum 1953 and have not been provided by Awa in VD16). Full email correspondence is attached.



The topographical data and site inspections of the boundary, show that water is not entering 160 Mazengarb Road from surrounding properties as indicated by the yellow arrows in Awa's diagram above. The data does show ponding entering the site from Mazengarb Road which our design proposes to prevent by raising the entrance to the new development.

When Niu Sila Way was developed, stormwater pipes were installed to ensure ponding within 160 Mazengarb Road, along the southern boundary was conveyed through Niu Sila Way due to the raised ground level and construction of the retaining walls preventing ponding escaping the site.

Whilst the ground level at No. 160 Mazengarb Road is being raised above Niu Sila Way, the site will be shaped so that it falls towards the centre of the site, conveying runoff away from the neighbouring properties.

The localised ponding within 160 Mazengarb Road, due to rainfall on the site has been catered for within the design which controls all stormwater generated from the new development.

19. *If the new flood model is going to be used, it is important that it is not just presented in isolation as part of the application for development on site. The application needs to be considered on the information submitted and therefore the if the new flood model is going to be relied upon it needs to show the flooding relative to the surrounding environment and any interaction or impacts that may or may not occur.*

Please refer to Point 18 above.

20. *If the new flood modelling is being relied on as part of the application, please provide further details regarding the extent of the floodplain around the application site and any interactions of that floodplain with the surrounding area, i.e. is the ponding from rain on grid or as a result of flow from off the application site.*

Please refer to Point 18 above.

21. *In accordance with NZS4404 - 4.3.1 please provide details of the how the proposed system meets the design life requirements for stormwater systems. In noting that this system proposes large private on site soakage please provide details around the proposed maintenance and/or replacement of the structures and how any such maintenance/replacement obligations under the body corporate agreement are proposed to occur in order to meet the required design life.*

An Operations and Maintenance Manual will be provided, with the maintenance, repairs and replacement being tied back to the Residents Society. The provision of this manual is anticipated as a condition of consent.

Water & Wastewater

22. *Please confirm that the design will achieve a minimum cover of 900mm for wastewater mains and a minimum cover of 600mm for water rider mains.*

Minimum cover will be achieved for wastewater and water rider mains, to be confirmed at detailed design.

23. *Please note that each wastewater lateral requires a cleaning eye. Please notate the Scheme Plan – Sewer Layout to reflect this requirement.*

Whilst this is typically a detailed design matter, cleaning eyes have been shown on Sheet 12 of the amended Scheme Plan.

24. *Please confirm that the minimum clearance between services as per NZS 4404:2010 Table 5.6 & 6.4 can be met.*

Minimum clearance between services will be met, to be confirmed at detailed design stage. An indicative service trench is provided on Sheet 11 of the amended Scheme Plan.

25. *Please amend the proposal so that the proposed pumpstation complies with the requirements of the LDMR, including that it be located away from vehicular access and within a separate lot. Please see Clause 5.3.11 under Schedule 5 of the LDMR for the requirements for pump stations.*

This was discussed at the 05 September meeting, with Megan Turner to follow up internally regarding out proposal.

The pump station is a private asset to be owned and maintained by the Residents Society, and will not be vested with Council. On this basis, it is practical to locate the pump station within the lot owned by the Residents Society, as opposed to a separate lot. With respect to the vehicle access, the pump station, including the lid, will be trafficable, so vehicles are able to enter / exit Lots 27 – 29 over the pump station.

Maintenance of the pump station will be undertaken during the daytime, when occupants are less likely to be moving to / from the units which access from the laneway. Any disturbance will be for short periods at arranged dates – similar to a rubbish

collection vehicle stopping in front of a driveway, a courier with a delivery, or a trades person who needs to site their vehicle close to a dwelling.

This is a common and accepted aspect more intensive development, or where streets are narrow and access is challenging which is common in Wellington's narrow streets. It's not uncommon for residents and service vehicles to negotiate access in the highly unlikely event there is an issue, and usually this is easily resolved by way of a conversation between parties.

Notwithstanding, any issues is highly unlikely and in the event there is a conflict, will be of short duration.

We're happy to include a consent notice advising that maintenance will be undertaken within the pump station and may intermittently restrict vehicle access to Lots 27, 28 and 29.

An alternative would be to only provide walk up access to these units and remove the on-site carparking which when considering the minor inconvenience of occasional maintenance on the pump station against the convenience of having an on-site carpark. The provision of a carpark is considered to be of greater benefit to the occupant to the minor and highly unlikely inconvenience of the pump station maintenance.

26. *Please note that a detailed pump station design for approval will be required at detailed engineering drawing stage (this will be included as a consent condition). The pump station shall be designed as per WSA04 sewage pumping station code of Australia, Version 2.1 (2005) and LDMR:2022.*

Noted. This is anticipated as a condition of consent.

27. *Please acknowledge that the water reticulation plan is to be confirmed as the water reticulation model is not yet completed.*

Since lodgement, the Water Supply Assessment has been completed by Stantec which suggests no issues with pressure, fire flow or resilience within the development or across the wider network. This assessment has been incorporated into the updated Engineering Infrastructure Report.

28. *The proposed connection of outdoor taps to the public watermain is not allowed as it is against Council's water bylaw. This proposal will not be supported. Please provide an alternative means of supplying non-potable water for household purposes such as toilet flushing, washing machines and outdoor taps (together with supporting information for the alternative proposal).*

Outdoor taps have been removed from the proposal.

It is noted that the lack of outdoor taps may cause issue at Building Consent stage with respect to being able to wash buildings. However, the Building Act 2004 provides for alternative solutions. In this instance, the washing of buildings will be managed by the Residents Society, who will organise for an external building maintenance contactors to come and wash the buildings. This has been working in practice at The Florian (Trieste Way), where the Residents Society engage a company to wash the buildings every 9 months.

We anticipate a condition of consent and consent notice imposing that no outdoor taps are to be installed on each dwelling / residential building.

The proposed water demand management solution has been further discussed under Point 38 below.

29. *As per Council's GIS the invert level of manhole KWWN003084 & KWWN003085 are 4.77 and 4.42 respectively in terms of the Wellington Datum 1953. The datum provided in the infrastructure report doesn't align with Council's GIS data. Please advise whether you have confirmed the datum through site investigation.*

These levels were provided in error and have been amended within the Engineering Infrastructure Report.

30. *Please provide a gravity feasibility report from a suitably qualified person. We believe looking at the finished ground levels on the earthwork plans, that gravity can be achieved for the proposed eastern lots.*

Please refer to the Infrastructure Effects on Page 56 of the lodged application and Section 6.3 of the Engineering Infrastructure Report. A gravity system can be achieved but would require approximately 2.5m of additional fill and retaining at the southwestern end of the site, which would leave the subject site around 1.5m higher than the adjoining property. When considering the additional bulk and location, privacy and shading effects that would be generated on the adjoining properties to the southwest as a result of ground level being raised to 1.5m above adjoining properties, we could not support this as a practical or acceptable outcome.

31. *Please provide a detailed design report for the low-pressure sewer system prepared by a suitably qualified person.*

This is detailed design and will be provided at engineering approval, it's anticipated a condition of consent will be imposed requiring the detailed design report for the low-pressure sewer system to be provided to Council.

32. *Please note that it will be necessary to comply with the recommendations of the geotechnical report while installing services within trenches. Trench details will be required at the detailed design stage.*

Yes, the recommendations of the Geotechnical Report will be followed whilst installing services. Trench details have been requested and provided at Point 7.

33. *For the communal bin areas, please provide an explanation of how the discharge from this area will not enter the stormwater system. The proposed solution should include a primary treatment system within the sump/grease trap prior to discharging it to the wastewater network. Please design and submit a solution for council's review and approval.*

The waste area will be shaped into itself so that water is concentrated into the waste area, and avoids capturing stormwater from outside of the waste area. A grease trap will be installed in the waste area, at the in person meeting Megan Turner mentioned that KCDC had some design details for grease traps that could be used – once received, we plan to incorporate these in the detailed design.

<u>Planning</u>

34. *Please provide an explanation of why the potential changes to the proposal discussed at the pre-application meeting were not actioned. These included*

reducing the number of dwellings and lots, varying setback distances from external site boundaries, clustering dwellings in groups rather than setting them out uniformly, and showing water demand management tanks for each dwelling on the plans.

We appreciate the early input of Council's planning consultant and note that initial concerns pertained to bulk and location, density and uniformity of the development, particularly with respect to the northern boundary, as well as alignment with the Residential Design Guide. Post pre-application meeting, an experienced Urban Designer (Urban Acumen) was engaged to review the proposal and provided a number of recommendations to achieve better urban design outcomes and overall alignment with the Residential Design Guide.

Between pre-application correspondence and lodgement, the following changes have been made:

- Removal of a unit;
- Setback distances staggered across the northwestern and northern boundaries to reduce uniformity;
- Introduction of a varied colour pallet to provide visual interest and reduce uniformity;
- Five two-storey units introduced to create variation in the roofline;
- Outdoor living spaces for units along the northern boundary shifted to the north to maximise sunlight access;
- Units along the eastern boundary shifted towards the Mazengarb Road frontage to provide better interaction with the street and opportunity for passive surveillance. Two units in the northeastern corner orientated towards the street for the same purpose;

Based on these changes and the input from Urban Acumen regarding achieving the urban design outcomes sought by the Residential Design Guide, we feel that the lodged proposal has addressed the concerns regarding bulk, uniformity, sunlight access and layout. The proposed water demand strategy has been discussed at Points 28 and 38.

Since the pre-application advice, the Niu Sila Way properties have also been included in the development with respect to undertaking earthworks to the existing retaining walls. This avoids creating an area of 'no mans land' between retaining at Niu Sila Way and at No. 160 Mazengarb and works to create a more cohesive landform and integrated development.

35. *Please provide a Landscape and Visual Assessment (LVA) from a suitably qualified person (Landscape Architect), which assesses the landscape, character and visual effects of the proposal on the surrounding environment, neighbouring properties and the streetscape. This LVA should also include an assessment of the proposal against the relevant District Plan objectives and policies.*

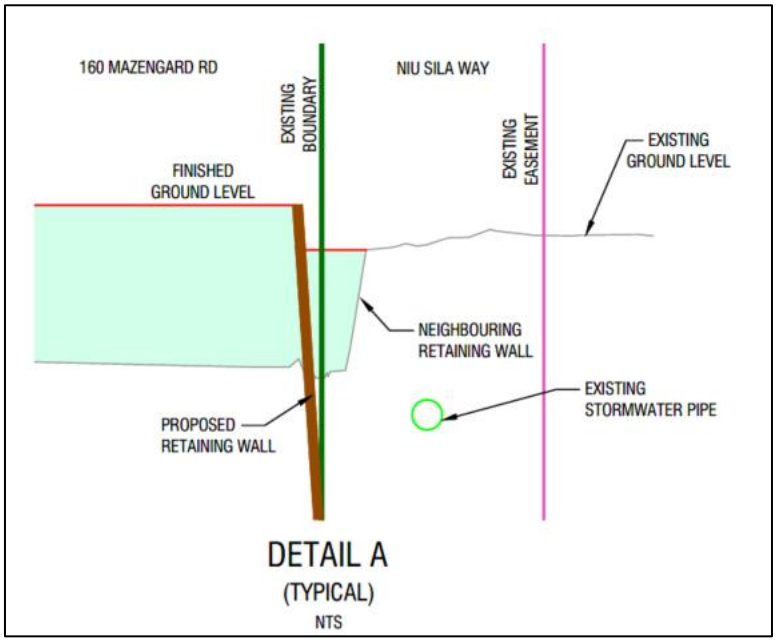
The site is not specifically identified in the District Plan as having significant or outstanding scenic or landscape amenity values.

Notwithstanding, a Landscape and Visual Impact Assessment is being prepared by DGSE, and will be forwarded through to Council once received, anticipated within the next week. Whilst this assessment is yet to be finalised, initial discussions with DGSE are that the site currently presents an anomaly in the immediate area, which is predominately residentially developed, and the residential development of the site is

more in character than what currently exists on site. We understand that based on conversations regarding their assessment, that the landscape and visual effects are very low, which is considered using the NZLIA scale to be less than minor with regards to consideration of effects under the RMA.

36. *Please provide an assessment of the effects of the proposed earthworks to be undertaken within the adjoining properties at Niu Sila Way on the water drainage easement labelled 'H', 'I', 'J', 'K' on Record of Title 1030162. Please advise whether Council's Water and Wastewater team has been consulted about the proposed fill earthworks within the easement.*

Consultation had not been undertaken with Council's Water and Wastewater Team with respect to the water drainage easement prior to the meeting on 05 September, where the easement was discussed with Paul Busing who confirmed that there was no fundamental issue with the works within the easement when considering that the pipes were installed to capture water from No. 160 Mazengarb Road, when Niu Sila Way was developed, as the retaining walls stopped the flow of water. As ground level at No. 160 Mazengarb (and the strip of land at Niu Sila Way) is being lifted, and falls inward, water is directed towards the centre of the site and the easement is effectively made redundant, refer to diagram below which has been excerpted from Sheet 4 of the Scheme Plan.



37. *Please confirm whether applications have been submitted to Greater Wellington Regional Council for the necessary discharge consent and earthworks consent. If applications have been made, please advise the application numbers and current status of the applications.*

Resource consent has not been lodged with GWRC yet, as we were waiting to have consent thoroughly progressed with KCDC prior to proceeding with GWRC consenting in case any design changes were required.

38. *Please provide additional justification for the proposal not to comply with the requirements of INF-MENU-R28 or INF-MENU-R35. The planning argument advanced for not meeting the District Plan requirements for water demand*

management that "The District Plan requirement to show a reduction in water use of 30% of the Household 2007 summer average water use has been met, largely through the introduction of metering in 2014" is not accepted. Equally, the proposal to connect outdoor taps to the potable water supply is not accepted (see point 28 above). Council is aware of other developments with limited space where water demand management tanks have still been accommodated.

At the 05 September meeting, Megan Turner advised she'd follow up on a volume of storage which Council deemed acceptable. We're awaiting this information, however since the meeting outdoor taps have been removed from the proposal.

The Engineering Infrastructure Report has outlined in detail the justification for not meeting Rules INF-MENU-R28 and INF-MENU-R35 using case studies and evaluation of potential storage options.

When considering the permitted activity standards in INF-MENU-R28, these require 10,000L of storage per dwelling, either communally or in individual tanks. This equates to 410,000L of storage, which when considering the actual anticipated water use associated with the development is excessive, and the layout of the proposed development would make construction of these tanks difficult given their proximity to dwellings and would requirement specific geotechnical provisions to be made.

The alternative option within the permitted activity standards is 4,000L of storage and each dwelling being fitted with a greywater re-use system, which equates to 164,000L of storage across the development. Greywater re-use systems were not considered due to the setback requirements to property boundaries, which is impractical within medium density developments.

The restricted discretionary standards for new (or relocated) residential buildings which do not comply with the permitted activity standards set out in Rule INF-MENU-R28 (i.e. 10,000L storage per dwelling) are:

1. *An assessment that demonstrates the system proposed will permanently reduce water demand associated with the residential unit(s) by at least 30% from Household 2007 summer average water use.*
2. *The provision of a non-potable supply for all outdoor uses associated with the residential unit, including garden irrigation.*
3. *Provision must be made to ensure that no outdoor taps can be connected to the potable public water supply system.*

With respect to Standard 1, whilst water metering has largely achieved a near 30% reduction from the *Household 2007 summer average water use*, the proposal further reduces water demand through the introduction of smaller units with outdoor living spaces which do not require irrigation and the requirement for water efficient fixtures to be installed.

The Sue Avenue / Moy Place case study referenced in the Engineering Infrastructure Report found that the introduction of water metering and water efficient fixtures reduced waster demand by 48% from the 2007 average (not including additional savings from water re-use tanks), noting that this study refers to larger dwellings (average 250m^2) on larger allotments (average 800m^2) which include grassed lawns and garden areas which require irrigation. In comparison, the proposal includes units of 63m^2 on lots between 109m^2 and 190m^2 with private outdoor areas which do not require irrigation. Indoor water use for multi-unit developments is estimated to at 20% less than a conventional standalone residential subdivision.

Thus, the nature of the development, provision of communal storage, introduction of water metering and mandatory use of water efficient fixtures is considered to have meet the 30% reduction sought by the District Plan.

With respect to Standard 2, the proposed units do not have associated gardens which require irrigation, with outdoor living spaces utilising paving and artificial grass. The removal of outdoor taps from dwellings also means that outdoor uses such as car washing will not be undertaken on site, and thus there is very little outdoor use associated with the individual units. It is noted that residents may choose to set up small scale garden activities outdoors which may require watering during summer months (i.e. herb garden, pot plants) however this presents very little water demand and does not differ to the indoor house plants which would be watered using the public supply.

Outdoor use for the communal area include the irrigation of the community lawn, water supply to the waste area and supply for washing the buildings. A 20,000L communal supply which is considered to sufficiently meet outdoor demand for these uses.

Thus, there is considered to be very little outdoor use associated with the proposed individual units and the 20,000L communal storage provides for the outdoor use associated with common areas.

With respect to Standard 3, outdoor taps have now been removed from the proposal and a consent notice proposed to restrict dwellings from having outdoor taps installed and connected to the public water supply.

On this basis, the removal of outdoor taps mean that the proposal largely meets the restricted discretionary standards set out in INF-MENU-R35. Noting that pursuant to Rule INF-MENU-R35, Council's matters of discretion include the supply, storage and use of non-potable water to the residential unit alongside effects on public health, ecological and hydrological systems.

The rationale behind water use for the proposed multi-unit development has been outlined above. The proposal is not considered to create and risk to public health or ecological systems. With respect to hydrological systems, the provision of storage tanks connected to toilets would alter natural hydrological systems through removing water from the hydrological catchment by conveying it away from the site via Council's wastewater network rather than runoff being captured using on-site soakage. One communal 20,000L tank is considered to strike a balance between providing for water re-use and reducing disruption to natural hydrological processes.

<u>Iwi – Ātiawa ki Whakarongotai</u>

39. *Please respond to the following comments made by the Ātiawa ki Whakarongotai Charitable Trust:*
The Proposed Works have the potential to generate adverse effects to Ātiawa values. The following will address these effects and make recommendations on how to mitigate them:

- *During the earthworks process, the Trust requests that any excess fill not be removed from the site but be retained for landscaping. If this is not practicable, the Trust requests that fill is retained within the rohe of Waikanae. Where fill needs to be brought in, the Trust requests it is sourced from within the rohe of Waikanae.*
- *It is important to Ātiawa that sediment runoff is monitored well. We require that sediment and erosion control is carried out to a standard that Kapiti Coast District*

Council is satisfied with, and that they are responsible for the ongoing monitoring and compliance of the Works.

- *The Trust is opposed to the removal of any native vegetation, and where plants are removed we request a twice-fold planting of native species to mitigate this. The Trust requests that chosen native vegetation is eco-sourced where practicable.*
- *Earthworks at the site have the potential to result in archaeological findings, we appreciate the inclusion of the Ātiawa ki Whakarongotai Accidental Discovery Protocol in the Application.*

We accept the recommendations made by the Trust, and are happy to accept these as conditions of consent.

We trust the above information satisfies your queries in full. If any further clarification is required, please don't hesitate to get in touch. We would appreciate consideration of draft conditions prior to the decision being issued and request the application be placed on hold under s91D of the RMA from receipt of draft conditions to our response.

Yours faithfully,

Emma Bean
Intermediate Planner
CUTTRISS CONSULTANTS LTD

Attachments:

1. Amended Scheme Plan – 23333 SCH, Rev B
2. Lighting Plan
3. Amended Engineering Infrastructure Report
4. Awa Flood Hazard Correspondence

To be provided:

5. Landscape and Visual Assessment prepared by DGSE