

APPENDIX 8

Assessment of Proposal in terms of Objectives, Policies and Anticipated Environmental Outcomes

Proposed Wairarapa Combined District Plan

**APPENDIX 8 – ASSESSMENT OF THE PROPOSED SUBDIVISION AND DEVELOPMENT AT FLAT POINT
IN TERMS OF
OBJECTIVES, POLICIES AND ANTICIPATED ENVIRONMENTAL OUTCOMES
OF THE
PROPOSED WAIRARAPA COMBINED DISTRICT PLAN**

Proposed Wairarapa Combined District Plan			Assessment
As varied by decisions on Submissions notified 29 March 2008.			
Rural Zone	Chapter 4		
	Objective Rur1 4.3.1	To maintain and enhance the amenity values of the Rural Zone, including natural character, as appropriate to the predominant land use and consequential environmental quality of different rural character areas within the Wairarapa.	The proposed subdivision will merely add to the existing development, the effects of which can be observed to be minor on the rural and area and coast. Therefore it is considered that the proposal will not have adverse impacts upon the character and amenity of this rural area.
	Policy Rur1 4.3.2 (a)	Identify areas within the Rural Zone where the predominant land use is primary production, which needs to operate and develop effectively.	<p>The soil type of this site is less suitable for primary production activities particularly arable crops or grazing.</p> <p>Given the coastal location and dune environment of this site it is unable to be used for primary production in the way that some of the surrounding land further back from the coast can be.</p>
	Policy Rur1 4.3.2 (d)	Maintain and enhance the amenity values, including natural character, of the differing Rural character areas through appropriate controls over subdivision and the bulk, location and nature of activities and buildings, to ensure activities and buildings are consistent with the rural character, including an appropriate scale, density and level of environmental effects.	<p>The proposal would create further residential use amongst coastal rural land which as outlined above is relatively unsuitable for arable crops and grazing.</p> <p>The proposal will enhance the existing dune environment through rehabilitation planting.</p> <p>Dwellings will be sensitively located amongst the dunes, limited in height and their designs will be sympathetic to this coastal environment.</p>

	Objective Rur2 4.3.4	To enable primary production and other land uses to function efficiently and effectively in the rural zone while the adverse effects are avoided, remedied or mitigated.	<p>The proposal does not involve primary production as the soil type is less suitable for this.</p> <p>The development will face the coast and dwellings will be amongst dunes. It is considered that there is sufficient space between surrounding sites containing primary production such that reverse sensitivity should not be an issue.</p>
	Policy Rur2 4.3.5 (a)	Provide for primary production activities as permitted activities in the Rural (Primary Production) Zone and the Rural (Special) Zone subject to such environmental standards as necessary to avoid, remedy or mitigate any adverse effects of primary production activities without unreasonably affecting landowners' ability to use their land productively..	See comments under Policy Rur1 4.3.2 (a).
	Policy Rur2 4.3.5 (b)	Provide for other land uses as permitted activities in the Rural (Primary Production) Zone and Rural (Special) Zone, subject to such environmental standards as necessary to avoid, remedy or mitigate any adverse effects .	<p>The District Plan provides for most land use activities as being permitted provided they can comply with the standards for Permitted Activities.</p> <p>Any effects of the proposed residential use can be avoided or mitigated to a level where they are considered to be no more than minor.</p>
	Policy Rur2 4.3.5 (c)	Ensure activities that are potentially sensitive to the adverse external effects of primary production and other activities, particularly those activities with significant external effects, are either appropriately sited, managed or restricted to avoid or mitigate effects.	<p>The proposal complies with this policy.</p> <p>The development will face the coast and dwellings will be amongst dunes. It is considered that there is sufficient space between surrounding sites containing primary production such that reverse sensitivity should not be an issue.</p>
	Policy Rur2 4.3.5 (d)	Ensure that new primary production and other activities that may have significant external adverse effects are appropriately sited from sensitive land use or are otherwise controlled to avoid or mitigate such effects.	The proposal does not involve new primary production activities.

	Policy Rur2 4.3.5 (e)	Provide interface controls on primary production and other activities that may have adverse effects on adjoining activities.	The proposed residential activity is compatible with surrounding land uses such that no specific interface controls are necessary.
Anticipated Environmental Outcomes	4.4 (a)	Protection of primary production as a principal land use and economic driver in the Wairarapa.	The proposal does not discourage or threaten any primary production activities particularly because it involves the use of a site with a soil type less suitable for primary production.
	4.4 (b)	Diverse activities in the Rural Zone that are compatible with the rural environment in scale, amenity and character.	The proposal will ensure this outcome is achieved. It will add to the diversity of activities in the Rural zone by providing a further cluster of residential activity that is consistent with the scale amenity and character of existing Flat Point community.
	4.4 (c)	Protection of the amenity in adjoining zones from the potential adverse effects of activities within the Rural Zone.	The application site does not adjoin any other zone.
	4.4 (d)	Increased level of self-sustainability and a reduced level of degradation on the natural environment and processes.	Each of the dwellings will be relatively self sustaining being on storage tank water and individual effluent disposal system. The existing dunes will be re-vegetated and protected. Adverse effects on natural character will be no more than minor.
	4.4 (e)	Protection from environmental pollutants such as excessive dust and noise.	Once the dwellings are constructed and rehabilitation planting has occurred it is considered that dust will be less of a concern. The Applicant extend seal on Flat point Road to the south-west boundary of Stage 2. Only typical residential noise will result which will generally be contained within the future dwellings, especially given that the use of outdoor living areas would be less frequent on this relatively exposed coast.
Coastal Environment Objectives and Policies	Section 13		
	13.3.1 Objective CE1 – Natural Character	To protect the natural character of the coastal environment by ensuring use, subdivision and development maintains the comparatively undeveloped nature of the Wairarapa Coast.	The proposed subdivision will add to an existing cluster/group of residential dwellings which are sensitively located amongst the dunes. The protection and restoration of the dune environment and larger lot sizes will ensure that a sense of it being relatively undeveloped is maintained.

	13.3.2 CE1 Policy (a)	Identify the extent of the coastal environment based on landscape and ecological principles.	The proposal falls within a dune environment and is within the extent of the coastal environment.
	13.3.2 CE1 Policy (b)	Manage the design, location and scale of subdivision and development in the identified coastal environment to ensure the special qualities and natural character of the coast are retained and adverse effects are avoided, remedied or mitigated, with priority given to avoiding effects.	<p>The subdivision proposes to add a further 42 allotments to the existing 39 created previously.</p> <p>The special qualities of this coast are the dramatic rolling country dropping down to a flatter dune environment. As part of this proposal the dunes will be rehabilitated and protected permanently.</p>
	13.3.2 CE1 Policy (c)	Recognise the key role of subdivision process in establishing the frameworks for development in the coastal environment, including the siting and design of structures.	The subdivision will add to an existing cluster/group of residential use occurring on this coast, it is considered the framework for development of this kind on this coast already exists.
	13.3.2 CE1 Policy (d)	Ensure that adverse cumulative effects of subdivision and land use and development on the special qualities and natural character of the Wairarapa Coast are avoided, remedied or mitigated	<p>Adding to the existing residential cluster will not have adverse cumulative effects on the coast.</p> <p>This is due to the maintenance of special qualities through; replanting and permanent protection of the dunes; sufficient capacity of roading; and the fact that the soil type is less suitable for primary production uses.</p>
	13.3.2 CE1 Policy (e)	Promote the consolidation of urban development at existing coastal settlements.	The proposal promotes consolidation by adding a further 42 allotments to the existing 39 residentially used allotments on this coast.
	13.3.2 CE1 Policy (f)	Manage the expansion of existing coastal settlements to ensure the special qualities of each settlement are protected.	The expansion of this cluster involves replanting and protection of the dune environment. This is a special quality of this cluster, that the dwellings are sensitively located amongst the dunes rather than flattening them.
	13.3.2 CE1 Policy (g)	Ensure the provision of adequate infrastructure, services and on-site mitigation measures as subdivision, land use and development occurs.	Each allotment will have its own water storage tanks and effluent disposal system. Power and telecommunication connections will also be provided as part of the subdivision.

	13.3.2 CE1 Policy (h)	Protect foreshore amenity values and avoid hazard risks by controlling the location of structures in the close proximity to the foreshore.	<p>Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.</p> <p>Information about natural hazards will be noted in information made available to all purchasers of new lots and could be included within a consent notice if necessary. This would alert existing and potential owners to the risks and facilitate preparedness. An emergency response evacuation plan will be established for the community in the event of natural events such as earthquake and potential tsunami.</p>
	13.3.2 CE1 Policy (i)	Discourage built development between roads and the foreshore where such roads are in close proximity to the foreshore, to protect the open coastal vistas.	The open space coastal vista will not be impacted upon as a result of this development as dwellings will be sensitively located amongst the dune and limited in height. No existing roads lie between the development and the coast.
	13.3.2 CE1 Policy (j)	Promote a strategic approach to the use and management of the Wairarapa Coast through the development of management plans, particularly for coastal settlements, for areas with significant natural character values and/or areas with significant environmental issues.	No management plans have been developed for this part of the Wairarapa Coast.
	13.3.2 CE1 Policy (k)	Encourage and support innovative land uses and development that retains or enhances the special qualities of the coast.	The proposed development is innovative and retains the special qualities that distinguish the existing community from a standard residential development. Both developments use the unique land form to maintain the coastal character and both development recognise and protect the dune environment.
	13.3.2 CE1 Policy (l)	Support cooperative relationships with landowners, communities and key stakeholders in managing the coastal environment and in environmental enhancement and public access projects.	The owners of lots in the existing Flat Point community have responsibilities through consent conditions of implementing and maintaining a dune management plan and adherence to an environmental care code. Public access to the beach is restricted to pedestrian access only with vehicle access for boat launching controlled by the owners of Flat Point Station. There is evidence over the past decade that this control of vehicle access has been beneficial in mitigating effect of access on the coastal dunes and marine life.

	13.3.2 CE1 Policy (m)	Adopt a precautionary approach to new subdivision and development where knowledge is lacking about coastal processes and where the risk from natural hazards are likely to be high.	<p>Natural drainage patterns are not impeded or interfered with in any significant way and ground cover will be maintained to avoid wind erosion of soil and/or sand. There is no risk of flooding from the Te Unu Unu Stream.</p> <p>Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.</p> <p>Information about natural hazards will be noted in information made available to all purchasers of new lots and could be included within a consent notice if necessary. This would alert existing and potential owners to the risks and facilitate preparedness. An emergency response evacuation plan will be established for the community in the event of natural events such as earthquake and potential tsunami.</p>
	13.3.2 CE1 Policy (n)	Require esplanade reserves/strips along the coastal marine area and estuaries and river mouths of significant waterbodies, recognizing that esplanade strips may be more appropriate if the special qualities of the coastal environment are likely to be detrimentally affected by esplanade reserves.	The application site does not include and water ways/bodies.
	13.3.4 Objective CE2 – Coastal Settlements	To provide for further development at coastal settlements in a manner that maintains the distinctive character and amenity values of each settlement.	The proposed subdivision will add to an existing cluster/group of residential dwellings, which are sensitively located amongst the dune. This will maintain the distinctive character and amenity values of the dunes.
	13.3.5 CE2 Policy (c)	Provide for further subdivision, use and development within existing coastal settlements in a manner that is appropriate to each settlement's character, its landscape and recreational values and its infrastructural capacity.	The proposed development replicates the character of the existing settlement, respects its landscape and recreational values. The only infrastructure utilised is Flat Point Road and the telecommunications facilities and power supply. These have capacity to accommodate further growth.
	13.3.5 CE2 Policy (e)	Establish development standards that recognize and maintain the character and amenity values of coastal settlements as appropriate.	The proposed subdivision is very closely modelled on the existing 39 allotments created as part of the previous subdivision. Similar conditions of consent are intended which will control design and appearance, location,

			earthworks and vegetation clearance and re-vegetation proposals. These are likely to meet or exceed any applicable standards.
	13.3.5 CE2 Policy (f)	Ensure public facilities and infrastructure are provided to serve the needs of residents and visitors while being located and designed to retain the character of the settlements.	All relevant public facilities have been provided at Stage 1 of the Flat Point development.
	13.3.7 Objective CE3 – Public Access & Enjoyment	To facilitate public access to, and enjoyment of, the Wairarapa's coast and its margins in a manner that protects its natural character.	The proposed subdivision will rely on access provided in the earlier development by way of an access strip and existing reserve from the existing public road.
	13.3.8 CE3 Policy (a)	Recognise and provide for existing recreational activities on the coast and its margins in a manner that protects its natural character.	The enlargement of the Flat Point Community will enable more people to experience and enjoy the recreational activities of this part of the coast without any detriment to its natural character.
	13.3.8 CE3 Policy (b)	<p>Ensure use, subdivision and development of the coastal environment provides for, or enhances, public access to and along the coast. Access should only be restricted for the following reasons:</p> <ul style="list-style-type: none"> i. To protect natural habitats. ii. To protect historic heritage features and areas; or iii. To protect public health and safety. 	<p>The proposed subdivision does not directly adjoin the coastal margin, but access will be available over an existing access strip and reserve.</p> <p>A boat launching access controlled by the owners of Flat Point Station limits the potential ecological effects that might otherwise occur from unrestricted vehicle access.</p>
	13.3.8 CE3 Policy (c)	Manage the potential for reverse sensitivity to arise when land use and development occurs in close proximity to areas of public recreation.	Dwelling sites are not in close proximity to areas of public recreation. It is unlikely that reverse sensitivity effects will arise.

Anticipated Environmental Outcomes	13.4 (a)	A pattern of settlement and development in the coastal environment that does not adversely affect natural, cultural or historic heritage values, and is able to be serviced efficiently, and does not result in sporadic, sprawling or ribbon development.	<p>The proposed development adds to an existing cluster, it is not alongside a main road and therefore cannot be considered to be a ribbon development.</p> <p>The development will be serviced with power and telecommunications, and each individual dwelling will have its own water storage tank and effluent disposal system.</p> <p>The development has been sensitively designed to fit the existing dune landscape will be subject to controls that protect and enhance its natural environment.</p>
	13.4 (b)	Commercial and residential development generally confined to existing settlements where the natural character values have already been compromised.	The proposal involves adding to an existing residential cluster of allotments, without compromising the natural character and values.
	13.4 (c)	The natural character of the Wairarapa's coastal environment is preserved or enhanced, and is protected from inappropriate use, subdivision and development.	The subdivision proposes the replanting and permanent protection of the existing dune environment. Given that the soil types for the application site are not suitable for primary production and that the development is adding to an existing cluster this is not considered to be inappropriate use, subdivision or development of this coastal environment.
	13.4 (d)	Public access to and from the coastal environment is maintained or enhanced, except where it would compromise other values in the coastal environment such as natural habitats, historic heritage, or increase risks associated with natural hazards, and public health and safety.	<p>Public access arrangements are maintained and are not able to be enhanced because the development does not directly adjoin the coast.</p> <p>The natural habitat will not be compromised as the proposal involves replanting and permanent protection of the dune environment.</p> <p>This part of the coast is not identified in the District Plan as having specific heritage values but given the history, a condition on a granted consent could outline the protocol should items of archaeological interest be found.</p>

	13.4 (e)	Subdivision and development occurs where there is no further exacerbation of significant risks from natural hazards, and where appropriate measures are taken to avoid or mitigate life and property from the risks of being adversely affected by natural hazards.	<p>Natural drainage patterns are not impeded or interfered with in any significant way and ground cover will be maintained to avoid wind erosion of soil and/or sand. There is no risk of flooding from the Te Unu Unu Stream.</p> <p>Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.</p> <p>Information about natural hazards will be noted in information made available to all purchasers of new lots and could be included within a consent notice if necessary. This would alert existing and potential owners to the risks and facilitate preparedness. An emergency response evacuation plan will be established for the community in the event of natural events such as earthquake and potential tsunami.</p>
Natural Hazards	Section 14		
	14.3.1 NH1 Objective	To manage activities and development within areas at significant risk from natural hazards, to avoid, remedy or mitigate the adverse effects of those hazards.	<p>Natural drainage patterns are not impeded or interfered with in any significant way and ground cover will be maintained to avoid wind erosion of soil and/or sand. There is no risk of flooding from the Te Unu Unu Stream.</p> <p>Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.</p> <p>Information about natural hazards will be noted in information made available to all purchasers of new lots and could be included within a consent notice if necessary. This would alert existing and potential owners to the risks and facilitate preparedness. An emergency response evacuation plan will be established for the community in the event of natural events such as earthquake and potential tsunami.</p>

	14.3.2 NH1 Policy (a)	Identify areas at significant risk from the effects of natural hazards, and update as new information becomes available.	This is a Council responsibility
	14.3.2 NH1 Policy (b)	Control the location and design of land use and subdivision in identified areas of significant risks from natural hazards to avoid remedy or mitigate adverse effects, with the controls appropriate to the level of risks.	The area is not one of significant risk, but in any event the comments Objective 14.3.1. NH1 apply.
	14.3.2 NH1 Policy (c)	Manage the type, location and design of new activities and development to avoid, remedy or mitigate the adverse effects of natural hazards to prevent unnecessarily exacerbating the risks to life, property and the environment from the effects of natural hazards.	Natural drainage patterns are not impeded or interfered with in any significant way and ground cover will be maintained to avoid wind erosion of soil and/or sand. There is no risk of flooding from the Te Unu Unu Stream. Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.
	14.3.2 NH1 Policy (f)	Ensure that where the development occurs within areas of significant risks from natural hazards, property owners and/or occupiers are appropriately informed of the risk.	Information about natural hazards will be noted in information made available to all purchasers of new lots and could be included within a consent notice if necessary. This would alert existing and potential owners to the risks and facilitate preparedness. An emergency response evacuation plan will be established for the community in the event of natural events such as earthquake and potential tsunami.
	14.3.2 NH1 Policy (i)	Where existing subdivision, use or development is threatened by a coastal hazard, coastal protection works should be permitted only where they are the best practicable option for the future. The abandonment or relocation of existing structures should be considered among the options. Where coastal protection works are the best practicable option, they should be located and designed so as to avoid adverse environmental effects to the extent practicable.	No coastal protection works are proposed.

	14.3.2 NH1 Policy (j))	The ability of natural features such as beaches, sand dunes, wetlands and barrier islands, to protect subdivision, use or development should be recognized and maintained, and where appropriate steps should be required to enhance that ability.	Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.
Anticipated Environmental Outcomes	14.4 (a)	The avoidance of further development in areas at significant risk from natural hazards cannot be effectively mitigated.	<p>Natural drainage patterns are not impeded or interfered with in any significant way and ground cover will be maintained to avoid wind erosion of soil and/or sand. There is no risk of flooding from the Te Unu Unu Stream.</p> <p>Proposed dwellings are to be set well back from the coastal margin, at an appropriate level above mean sea level and separated from the active shoreline by a stable foredune.</p> <p>Information about natural hazards will be noted in information made available to all purchasers of new lots and could be included within a consent notice if necessary. This would alert existing and potential owners to the risks and facilitate preparedness. An emergency response evacuation plan will be established for the community in the event of natural events such as earthquake and potential tsunami.</p>
	14.4 (b)	Reduced effects from natural hazards, where possible, to minimize damage to property, land, and life in areas subject to the natural hazards.	
	14.4 (c)	Activities or structures that do not create, accelerate, displace or increase the effects of a natural hazard.	
	14.4 (d)	Greater public awareness of natural hazards, their effects on people and development and ways to prepare for a natural disaster.	
Subdivision, Land Development and Urban Growth	Section 18		
	18.3.1 Objective SLD1 – Effects of Subdivision & Land Development	To ensure subdivision and land development maintains and enhances the character, amenity, natural and visual qualities of the Wairarapa, and protects the efficient and effective operation of land uses and physical resources.	The proposed subdivision is an efficient use of land because the soil type is less suitable for primary production; it creates residential allotments varying between 1238m ² – 2650m ² which are designed to preserve a sense of openness and protect the dune environment. The proposed cluster design amidst the dune landscape maintains visual character.
	18.3.2 SLD1 Policy (a)	Manage subdivision and land development in a manner that is appropriate for the character and qualities of the environmental zone in which it is located, while recognising that such change may alter the character and qualities.	The design and setting of the proposed subdivision is such that it carefully balances the development with the character and quality of the coastal dune environment.

	18.3.2 SLD1 Policy (b)	Provide subdivision where it is compatible with the physical characteristics of the site, provided any adverse environmental effects are avoided, remedied or mitigated.	The design and setting of the proposed subdivision is such that it carefully balances the development with the character and quality of the coastal dune environment.
	18.3.2 SLD1 Policy (d)	Set minimum allotment sizes for the Residential and Rural Zones that provide a baseline for maintaining the character, scale and intensity of development of their Zones, including their servicing capacity, while recognising the differing constraints, qualities and characteristics within each zone.	This has been done within the Wairarapa Combined District Plan. The Plan lots sizes have been adapted to suit the coastal residential nature of the proposed development.
	18.3.2 SLD1 Policy (f)	Limit the intensity of subdivision and land development in those rural parts of the Wairarapa in which significant intensification may have adverse effects on the risks from natural hazards, the operational requirements of key infrastructural and land use assets, water supply catchments, and the growth of urban areas.	<p>The intensification proposed through this subdivision will not have any impact on infrastructure, land use assets or water supply catchments as each allotment will be individually serviced.</p> <p>For natural hazards see comments above.</p>
	18.3.2 SLD1 Policy (g)	<p>To provide for the subdivision of rural land for rural-residential purposes through minimum standards that seek to:</p> <ul style="list-style-type: none"> i. Avoid or mitigate any significant potential adverse effects on the viability and operational requirements on any productive use of any adjacent rural or industrial land. ii. Ensure allotment sizes and the pattern of subdivision maintains the open rural character, particularly from public roads; iii. Ensure allotments are able to accommodate the likely use in accordance with the requirements of the plan; iv. Avoid adverse effects on the safe 	<p>The application site does not adjoin any particularly productive rural or industrial land.</p> <p>The proposed allotments vary between 1238m² – 2650m². This is an appropriate size to provide continuity with the</p>

		<p>v. and efficient use of roads, and pedestrian and cycling networks; Satisfactorily avoid or mitigate the potential reverse sensitivity effects in relation to either nearby industrial and rural productive activities, activities allowed by the zoning, or anticipated by urban growth.</p> <p>vi. Ensure the actual and potential effects on rural character, amenity and natural values will not be compromised by intensive and ad hoc urban development and/or through the cumulative effects of rural-residential development;</p> <p>vii. Ensure the sewage effluent from all lots can be effectively disposed without any potential adverse effects on the environment.</p> <p>viii. Ensure potable water supply is available on each allotment.</p>	<p>existing development, a sense of openness and protection for the dune environment.</p> <p>These allotments will be of a sufficient size to accommodate the residential use proposed, although not in accordance with the requirements of the plan.</p> <p>As outlined within the traffic report included with this application the proposal will have no more than minor adverse effects on the roading network.</p> <p>The property is coastal with a sandy soil type. The surrounding properties are similar especially to the east and west along the coast and potential for primary production on these properties is likely to be less. The site is buffered by Flat Point Road to the north and the coast to the south. The potential for reverse sensitivity is considered to be low.</p> <p>The proposal cannot be considered to be ad hoc, as it is adding to an existing cluster of residential use. Adding to the existing residential cluster will not have adverse cumulative effects on the coast. This is due to the maintenance of special qualities through replanting and protection of the dunes, along with sufficient capacity of roading and that the soil type is not suitable for primary production uses.</p> <p>Individual effluent disposal systems will be provided for each allotment.</p> <p>Each dwelling will have water storage tanks to ensure a potable water supply is available.</p>
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	18.3.2 SLD1 Policy (h)	<p>Allotments below the minimum standards in the Rural Zone will not be allowed unless there are exceptional or unique circumstances, particularly if one or more of the following matters applies:</p> <ul style="list-style-type: none"> i. The proposed subdivision is likely to have significant adverse effect on the viability and operational requirements of any productive use of adjacent rural or industrial land, including activities allowed by the zoning, or anticipated urban growth; ii. The allotment sizes and/or pattern of the subdivision would not maintain the open rural character, particularly from public roads and vantage points; iii. Allotments are unable to accommodate the likely use in accordance with the other requirements of the Plan; iv. The subdivision would require an extension or upgrading of any service or road that is not in the economic interest of the District; v. The subdivision would compromise the safe and efficient use of the road network; vi. Any exacerbation of risks from flooding or other natural hazards that is likely to occur through intensified landholdings, occupation or where capital and infrastructural investment is more than minor; vii. The proposal is unlikely to be able to satisfactorily and reliably dispose of effluent; viii. The proposal is likely to lead to 	<p>It is considered that there are unique circumstances which exist, that will enable consent to the subdivision to be granted. These include the existence of the exiting Flat Point residential community, the logical extension of this existing development following a similar cluster pattern integrated with the dune landscape, and the ability for the landscape to absorb low-rise, individually sited, single dwellings without adverse effects on natural character.</p> <ul style="list-style-type: none"> i) As outlined previously the potential for primary production activities on this site and those adjoining is low given the soil type and dune environment. Urban growth is not anticipated at Flat Point. ii) The subdivision layout is organic in form in response the natural dune landforms. The subdivision controls are designed to ensure buildings are visually unobtrusive, in particular this includes controls that prevent buildings being elevated for views. Proposed dwellings will be nestled amongst the small scale dune landforms. Most views from the beach area will be screened by the active coastal dunes immediately behind the beach. The site will have relatively low visibility, particularly from public places. (see Landscape and Visual Assessment Appendix 1. iii) The allotment sizes will vary between 1238m² – 2650m² and will be able to accommodate residential uses in accordance with the relevant provision of the plan when these are applied to the proposed development. iv) No road or service extensions are necessary. v) The proposed subdivision will not compromise the safe and efficient use of the road network – see Traffic Report Appendix 12. vi) For comments on natural hazards – see above. vii) A reliable on-site wastewater treatment and disposal system will be installed for each lot – see Appendix 6.
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		<p>ad hoc urban development and/or adverse effects on rural character, and natural values through the cumulative effects of rural-residential development in the vicinity;</p> <p>ix. The proposal is unable to provide a potable supply of water.</p>	<p>viii) The proposal can not be considered to be ad hoc, as it is adding to an existing cluster of residential use. Adding to the existing residential cluster will not have adverse cumulative effects on the coast. This is due to the maintenance of special qualities through replanting and protection, along with sufficient capacity of roading and that the soil type is not suitable for primary production uses. See also Landscape and Visual Assessment - Appendix 1.</p> <p>ix) Collected roof water stored in a 22,500 litre tank on each site will provide a potable water supply. This level of storage has been proved adequate by experience with the existing development.</p>
	18.3.2 SLD1 Policy (i)	<p>In the Rural (Coastal Environment Management Area) allotments, particularly where new buildings and structures are likely to be constructed, shall;</p> <p>i. Avoid or mitigate any adverse effects on landscape, natural and amenity values from any buildings, structures and accessways;</p> <p>ii. Not degrade the natural character of the coastal environment through an inappropriate density, scale and location;</p> <p>iii. Avoid the formation of new settlements in the coastal environment;</p> <p>iv. Avoid unduly compromising coastal views and public access to the margins of the coast and rivers; and</p> <p>v. Not significantly exacerbate the risks from coastal erosion and inundation and/or other hazards.</p>	<p>i) As part of this proposal the potential adverse effects of the subdivision will be mitigated through height limits and sensitive locations amongst the dunes for future dwellings. (Building Areas have been identified as part of this application see the plan 26811RCD).</p> <p>ii) The Landscape and Visual Assessment – Appendix 1 concludes that<i>"the proposal is located near the natural focus of Flat Point but far enough inland to protect the natural character of the coast itself; it is designed around the natural landforms; the controls will ensure houses are nestled in the landforms and the subdivision as a whole will have an open, organic and low-key character."</i></p> <p>iii) The proposed development is not a new settlement as it is adding to an existing cluster/group.</p> <p>iv) Public access will be maintained through the existing access strip and reserve vested by the Applicant at the time of the earlier development. Coastal views from public places are not compromised by the proposed development.</p> <p>v) Hazards – see above comments.</p>

	18.3.2 SLD1 Policy (j)	To provide for subdivision below the minimum standards if it results in the more effective management of network utilities or the protection of significant heritage assets and natural areas.	<p>The proposal does not allow for more effective management of network utilities or heritage assets, as neither of these are really relevant to this proposal.</p> <p>The proposal will provide for replanting and permanent protection of the dune environment which is more effective management than is currently required under the district plan for these dunes.</p>
	18.3.2 SLD1 Policy (m)	To support the use of integrated and innovative subdivision design and best practice to maintain and enhance the character and qualities of the environmental zone in which it is located.	<p>The conclusion of the Landscape and Visual Assessment (Appendix 1.) demonstrates that the subdivision is both innovative and an example of best practice;</p> <p><i>...."the proposal is located near the natural focus of Flat Point but far enough inland to protect the natural character of the coast itself; it is designed around the natural landforms; the controls will ensure houses are nestled in the landforms and the subdivision as a whole will have an open, organic and low-key character."</i></p>
	18.3.4 Objective SLD2 – Effects of Servicing Requirements	To ensure that subdivision and land development is appropriately serviced to provide for the likely or anticipated use of the land.	The subdivision will be appropriately serviced for the residential use intended.
	18.3.5 SLD2 Policy (a)	Ensure adequate infrastructure is provided by the subdivider/developer to allow new activities and developments to connect to wastewater and water reticulation where adequate capacity exists to meet the needs of development.	On-site wastewater treatment and disposal systems, potable water storage, access roading, stormwater disposal facilities, telecommunications and electric power reticulation will be provided by the Applicant.
	18.3.5 SLD2 Policy (c)	Avoid, remedy or mitigate any adverse effects resulting from stormwater discharges.	There will be no adverse effects from stormwater discharges.
	18.3.5 SLD2 Policy (d)	Ensure that owners of unserviced lots are responsible for providing potable water supply and for the disposal of sewage and stormwater in a manner that avoids, remedies or mitigates any adverse effects.	The proposed lots will effectively be "serviced lots" through the provision of on-site wastewater treatment and disposal systems and water storage facilities. Adverse effects are not anticipated.

	18.3.5 SLD2 Policy (e)	Promote infrastructure and servicing design solutions for development that avoids, remedies or mitigates significant adverse environmental effects on natural and physical resources, ecosystems and amenity values (for example water bodies).	The servicing of the proposed development will promote such solutions.
	18.3.7 Objective SLD3 – Sustainable Infrastructure Development	To maintain sustainable and efficient public infrastructure that meets the additional demand generated by development and subdivision, while avoiding, remedying or mitigating adverse effects on the environment.	The proposed subdivision does not utilise public infrastructure, apart from Flat Point Road, which is more than adequate for the additional traffic.
	18.3.8 SLD3 Policy (a)	Require an equitable contribution from developers where new connections to the Council's water supply or wastewater disposal services will contribute to a future need for upgrades or extensions.	Allotments will not require connections to Council reticulation. The proposal is that the Applicant ensures that each lot is provided with potable water supply/storage system by collecting and storing roof water and an on-site wastewater treatment and disposal system. Therefore contributions are not required.
	18.3.8 SLD3 Policy (b)	Require contribution where an activity necessitates road upgrading to avoid, remedy or mitigate adverse effects on the road or wider environment.	The traffic assessment (see Appendix 12) concludes that the likely volumes of traffic travelling to and from the development will be such that an upgrade of the existing unsealed portion of Flat Point Road is not necessary.
	18.3.13 Objective SLD5 – Reserves and Open Space	To sustainably manage and develop the reserve and open space network to cater for current and future community needs and to protect and enhance significant environmental assets.	This appears to be a Council responsibility
	18.3.14 SLD5 Policy (a)	Require a reserve contribution from new residential and visitor accommodation development, including rural subdivision creating vacant lots that have the ability to be developed for residential purposes, that is proportionate to the demand for passive and active community recreational requirements arising from the development, including the	It is anticipated that Council will assess the demand for passive and active community recreation requirements arising from the development and require an appropriate contribution for Reserves. It should be noted that land for public reserve was provided at the time of creation of the existing Flat Point Community, in excess of the statutory maximum. A credit therefore should apply in favour of this subdivision.

		need to protect the Wairarapa's key environmental assets such as its coastal margins and natural features.	
	18.3.14 SLD5 Policy (b)	Ensure land acquired as a reserves contribution is located and designed to complement the recreational open space needs and amenity of the District.	See comments above
	18.3.14 SLD5 Policy (c)	Manage subdivision and development adjacent to or near reserves to ensure public access (or future public access) is provided at the time of subdivision and/or development.	The existing reserve is immediately adjacent to the proposed Access Lot serving the proposed subdivision. All lots will have easy walking access to the reserve and the coastal margin.
Anticipated Environmental Outcomes	18.4 (a)	Allotments of a size form and pattern to provide for land uses that are compatible with the values, character and qualities of the immediate environment.	The proposal will extend a previous subdivision which is a cluster of large residential sized allotments which have dwellings amongst the dunes which are limited in height and location.
	18.4 (b)	The long-term protection of significant natural and historic values of subdivided land.	The subdivision will enable permanent protection for the dune environment.
	18.4 (c)	Structured urban growth that is well connected and compatible with the existing urban and surrounding environment.	While the proposal is not " <i>urban growth</i> " in the conventional sense of the term, the proposal does extend an existing cluster of residential development. The proposal will be connected to the existing residential use in this area via established roads and directly adjoining its boundaries.
	18.4 (d)	Effective wastewater systems that protect the quality of ground and surface water resources.	The future dwellings will be serviced using individual on-site wastewater systems with re-circulating packed bed reactors using subsoil drip irrigation.

	18.4 (e)	Appropriate stormwater disposal that does not adversely impact on adjoining properties or existing stormwater systems.	Existing stormwater reticulation will be utilised for discharge, where not collected as a water supply source within individual water storage tanks.
	18.4 (f)	The provision of an appropriate level and standard of roads and other access facilities, services and reserves.	The traffic report submitted as part of this application identifies that the proposal will not require any upgrading of existing roads and supports the layout and dimensions of the proposed access roading.