

Appendix A: Overview of Applicant Response to Section 53 Comments

Table 1: Greater Wellington Regional Council (08) - relevant local authority FTAA section 53(2)(a)

Matters raised	Applicant response
Stormwater Management	
Issue 1: Proposed approach to stormwater management The proposed approach to stormwater management is inadequate as it does not incorporate water sensitive urban design measures, contaminant treatment is significantly undersized, there is no meaningful hydrological control of stormwater discharge volumes, and it is uncertain whether the proposed stormwater management devices can reasonably be maintained. The proposal also includes several unmanaged point source discharges of stormwater from local networks, including over private property. It is uncertain whether intended future stormwater asset owners (Tiaki Wai and potentially NZTA) will accept the proposed stormwater networks.	The Applicant disagrees that the proposed stormwater management approach is inadequate or requires fundamental redesign. The Engineering Memorandum attached as Appendix D concludes that the proposed treatment train represents the best practicable option for the site's steep topography, low permeability soils, geotechnical constraints and dispersed catchments, and confirms that the raingarden sizing methodology is consistent with relevant water sensitive urban design guidance. The Applicant has however updated supporting documentation, design calculations and stormwater plans to improve clarity and consistency.
Issue 2: Proposed retention wetlands There are a range of unresolved technical issues associated with the design of the proposed retention wetlands, including: Whether they will achieve hydrological control of stormwater discharges; - Hydraulic modelling of baseflows; - Whether they will support wetland environments for the purpose of ecological remediation or offsetting; - Potentially unmanaged adverse water quality effects (including temperature, dissolved oxygen, <i>E. coli</i>, and urban contaminants) at each wetland and downstream; - Issues with implementing an online retention wetland (Retention Wetland E); - Ability to reasonably maintain the wetlands. There is a material risk that the proposed retention wetlands cannot achieve their ongoing stormwater management functions at the same time as meeting the	The Applicant disagrees that the proposed retention wetlands are unsuitable or unable to achieve their intended stormwater and environmental functions. The Engineering Memorandum concludes that the wetlands provide hydrological control through permanent storage and extended detention, while also delivering ecological enhancement benefits. In response to comments received, the Applicant has accepted several refinements including re-grading wetland bases and increasing maintenance access widths from 3 m to 4 m, but does not consider that fundamental redesign is required.

ongoing ecological obligations that attach to them and cause adverse effects downstream.	
Issue 3: Financial contributions for stormwater discharges The Applicant has proposed to pay financial contributions to offset the residual adverse effects of stormwater discharges but has not proposed conditions that would allow this to occur.	The Applicant does not support the imposition of conditions requiring stormwater financial contributions, and disagree they are required to offset residual adverse effects of stormwater discharges. The Planning Memorandum attached as Appendix B concludes that the stormwater management system has been designed to avoid, remedy and mitigate adverse effects through engineered treatment, attenuation and management measures, and that the proposal does not need financial contributions to address any residual effects.
Streams & Natural wetlands	
Issue 4: Functional need to reclaim the Taupō Stream The Application does not demonstrate a functional need to reclaim the Taupō Stream, because it is uncertain whether the proposed roundabout is the only practicable option to establish an intersection with SH59.	The Applicant maintains that the proposed SH59 roundabout design remains the only practicable access solution (given NZTA's requirement for a roundabout), and as such there is a functional need for the culverting works. The functional need test is addressed in the Memorandum of Counsel in Appendix L and the Planning Memorandum attached as Appendix B. The Ecology Memorandum in Appendix D confirms the proposed mitigation and offsetting measures for the affected stream environment are appropriate.
Issue 5: Assessment and effects management for the loss of the Taupō Stream The proposed compensation for the loss of the Taupō Stream is inadequate, as the SEV assessment and ECR calculations used to determine the compensation use insufficient data and appear to contain errors, and have not in any case been accurately implemented as part of the compensation proposal.	The Applicant disagrees that the stream compensation package is inadequate. These matters are addressed in an Ecology Memorandum attached as Appendix D. Dr Vaughan Keesing responds in detail to GWRC's critique of the SEV and ECR calculations, concluding that the revised field-based SEV assessment is robust and that the proposed stream enhancement provides an offset ratio of approximately 1:1.55, which appropriately compensates for the affected stream reach.
Issue 6: Assessment and effects management for the loss of stream beds on site	The Applicant disagrees that stream effects have been inadequately assessed.

The proposal will affect approximately 790 linear metres of stream bed on site and relies on permanent water habitat created within the retention wetlands to remediate these effects. However, effects of the proposal on streams on site have not been adequately assessed, and it is uncertain whether the retention wetlands will sufficiently remedy these effects.	The Ecology Memorandum attached as Appendix D concludes that the proposal will result in a substantial net gain in aquatic habitat and ecological function.
Issue 7: Provision for fish passage through culverts Insufficient data about the presence of fish within the catchments where culverts and piping will be located means that there is insufficient certainty about whether these structures can provide for the passage of fish species that may be present in the catchment.	The Applicant agrees that fish passage should be provided, but only where ecologically justified. The Ecology Memorandum attached as Appendix D supports conditions requiring fish passage for the Taupō Stream culvert and retention wetlands B and E. It considers additional fish surveys unnecessary as existing survey data are sufficient to identify the species likely to be present and inform culvert design.
Issue 8: Fish management plan The proposed fish rescue plan is inadequate as it does not provide for a range of matters that are necessary to provide for the appropriate salvage and handling of fish encountered during works.	The Applicant disagrees that the proposed fish salvage plan is inadequate. The Ecology Memorandum attached as Appendix D concludes that the draft Fish Salvage Plan appropriately provides for fish rescue and relocation while allowing flexibility for suitably qualified ecologists to adapt methods in the field, and that many of the additional requirements sought by GWRC are unnecessarily prescriptive.
Issue 9: Assessment and effects management for natural inland wetlands The adverse effects of the proposal on natural inland wetlands have not been appropriately assessed or offset. In particular: • The loss of natural inland wetlands is greater than claimed by the Applicant; • The effects have been inappropriately assessed on a whole-of-catchment basis, which is not consistent with the EIANZ Guidelines. When appropriately assessed, the adverse effects of the project on natural inland wetland extent and ecological values are more than minor. • The proposed approach to offsetting is inappropriate, as it does not offset the loss of wetland extent.	The Applicant disagrees that wetland effects have been underestimated or that the proposed offset package is inadequate. The Ecology Memorandum attached as Appendix D responds to concerns regarding wetland extent, application of the pasture exclusion, ecological valuation, EIANZ methodology, and offsetting, concluding that the identified wetland areas and values are accurate and that the proposed remediation and enhancement package will result in a significant overall improvement in wetland condition and function.

There is also uncertainty about whether the proposal will have adverse effects on existing retained wetlands.	
Issue 10: Implementation of freshwater effects management The Application and proposed conditions do not adequately manage the complexity of implementing freshwater effects management (including remediation, offsetting, compensation, monitoring, and adaptive management) in a manner that coordinates with development staging.	The Applicant agrees that a more integrated implementation framework through consent conditions would be beneficial. The Ecology Memorandum attached as Appendix D supports the inclusion of an Ecological and Hydrological Management Plan (EHMP) to coordinate staging, wetland creation, offset delivery, monitoring, fish passage requirements and adaptive management, while maintaining that the proposed mitigation package itself is appropriate.
Culverts	
Issue 11: Culvert design feasibility There are design feasibility issues with several of the proposed culverts which should be addressed to ensure that the proposed culverts will adequately convey flood flows and avoid adverse effects on natural processes in streams.	The Applicant disagrees that the application fails to demonstrate culvert feasibility. The Engineering Memorandum confirms that the proposed culvert network is feasible and capable of construction, operation and maintenance, with additional hydraulic calculations, typical details and location-specific responses provided in response to GWRC's concerns. Remaining matters such as scour protection sizing and outlet treatment are detailed design matters that can appropriately be addressed through engineering approval processes.
Earthworks	
Issue 12: Management plan approach for earthworks The structure and purpose of management plans for earthworks is not clear. The flat hierarchy of management plans defers detail to multiple stage-specific management plans, without a clear site-wide approach to guide the implementation of staging.	The Applicant agrees that some additional clarity regarding management plan hierarchy is beneficial. The Engineering Memorandum confirms that the Draft Earthworks Construction Management Plan functions as the overarching project-wide framework, with stage-specific plans providing detailed controls for certification as development progresses. The Applicant has amended the management plan framework to improve clarity while maintaining the staged and adaptive management approach proposed.

Issue 13: Water quality monitoring and discharge quality conditions The interpretation of sediment treatment device trigger levels is uncertain, the purpose of proposed continuous turbidity monitoring is unclear, and there are no conditions that limit discharge quality.	The Applicant agrees with some of the comments relating to the clarification of monitoring and implementation measures. The Engineering Memorandum and supporting earthworks documentation have been updated to provide additional detail regarding monitoring, stabilisation measures, sediment controls and implementation requirements. However, the Applicant disagrees that the matters raised identify any fundamental deficiency in the proposed erosion and sediment control framework.
Issue 14: Implementation of earthworks mitigation measures Separating earthworks from wetlands and streams, and the minimisation of areas of exposed earth, are identified as key mitigation measures for earthworks. However, the implementation requirements for these mitigation measures are not well articulated in the draft Earthworks Construction Management Plan (ECMP) or proposed conditions.	The Applicant agrees that implementation requirements could be better articulated. The Engineering Memorandum confirms that additional detail regarding buffer distances, sediment controls, stabilisation measures and staging has been incorporated into the Draft Earthworks Construction Management Plan, while retaining flexibility to tailor controls through certified stage-specific plans. The Applicant maintains that the proposed framework provides a robust and adaptive approach to managing earthworks effects and protecting downstream receiving environments, including Taupō Stream, Kakaho Stream and Te Awarua-o-Porirua Harbour.
Regional & Public Transport	
Issue 15: Need to future-proof for public transport	The Applicant considers no changes are required to the proposal in response to these comments. Further comment is provided in a Transport Memorandum attached as Appendix G confirming the proposed approach is appropriate with regard to these matters.
Issue 16: Safe pedestrian/cyclist access to existing Ara Harakeke Pathway	
Issue 17: Future-proofing active transport links with Pukerua Bay via Muri Block	
Issue 18: Provision for cycling on north-south connector road	

Table 2: Porirua City Council - relevant local authority FTAA section 53(2)(a)

Matters raised	Applicant response
General Amendments to the proposed conditions should be made to ensure that they comprehensively address the necessary matters and are robust and enforceable.	The Applicant agrees with this statement. The Applicant is seeking a clear and concise set of conditions for Mt Welcome. This will aid the consent holder and their contractors to comply with conditions, and assist both councils to effectively and efficiently monitor and enforce them. Changes proposed to conditions as a result of comments are summarised in the Planning Memorandum in Appendix B.
Positive effects The proposed development has the potential to have positive economic and social effects for Porirua and the wider region by providing additional land ready for development of housing.	The Applicant agrees with this statement. This aligns with the findings in the Economic Assessment provided with the Application as Appendix 13.
Cultural The Site is within the rohe of Ngāti Toa Rangatira (Ngāti Toa). Te Rūnanga o Toa Rangatira (Te Rūnanga) is the mandated iwi authority for Ngāti Toa. Only mana whenua are able to comment on the actual and potential cultural impacts of the proposed development. The position expressed in the written comments provided by Te Rūnanga on the proposal are strongly aligned with the comments in the sections below.	The Applicant has worked closely with Te Rūnanga o Toa Rangatira throughout this process. See Table 3 below for a summary of their comments on the proposal, and the Applicant's response.
Urban Design I consider that, overall, the proposed development provides a relatively positive urban design outcome for the site and that, where the design is in accordance with the Northern Growth Development Area Structure Plan, it will contribute to a well-functioning urban environment. Some of Council's suggestions to improve urban design outcomes during pre-application consultation have been incorporated into the application. However, there remain a number of areas where further changes should be made to ensure that the development achieves a well-functioning urban environment consistent with the outcomes set out the Northern Growth Development Area chapter of the Porirua District Plan 2025 and the associated Structure Plan. These changes also relate to the broader effects of the development on the environment and the future residents of the area, as well as mitigating potential adverse effects on the	The Applicant agrees and considers that the proposed development provides an overall positive urban design outcome for the site. No changes are proposed to site plans in response to PCC urban design comments, however changes are proposed to consent conditions, including placing consent notices on titles of Lot 5003 to ensure future east west connection is not precluded. Further comment can be found in the Planning Memorandum in Appendix B, and in the Landscape, Visual and Urban Design Memorandum attached as Appendix H.

integration of the proposed development with the surrounding existing and potential future urban environment. These include providing for transport connections to the southern boundary and linkages within the site, ensuring the design outcomes for the commercial centre are achieved, relocating parks, better integrating provision for active transport, and ensuring proposed management and implementation are codified through appropriate conditions.	
Subdivision design I consider the overall subdivision layout and design shown in the scheme plan is generally in accordance with the Northern Growth Development Area Structure Plan. The subdivision design provides for a future commercial centre, adequate recreational space and number and distribution of parks, and residential allotments of generally appropriate size and shape. However, there are areas where significant changes to the proposed scheme plan are needed to address specific concerns, including amendments to ensure that future transport connections can be achieved within and at the boundaries of the site, changes to the proposed reserve classifications, and allocation of land to the electricity and telecommunication infrastructure.	The Applicant agrees the proposed development is generally in accordance with the Northern Growth Development Area Structure Plan. The Applicant agrees that some amendments and clarifications to servicing, vesting and infrastructure staging arrangements are appropriate. The Engineering Memorandum attached as Appendix C confirms that revisions have been made to scheme plans, easements, overland flow path provisions, drainage lots, three waters vesting arrangements and staging documentation, while maintaining that the proposed subdivision can be appropriately serviced and delivered and that the matters raised do not identify any fundamental constraint to development.
Infrastructure and servicing Responsibility for delivery of three waters infrastructure within Porirua was transferred to Tiaki Wai on 1 July 2026. Tiaki Wai has been invited to provide written comments separately from Porirua City. I understand that Taiki Wai is not comfortable with the proposed three waters infrastructure, including the on-site mitigation methods proposed. In particular, significant concerns have been identified with the proposed stormwater network as well as the proposed on-site wastewater mitigation. There does not appear to be any proposed design for electricity or telecommunication infrastructure on the site or sufficient information on how electricity and telecommunication infrastructure is to be provided to each allotment. No space has been allocated within the proposed scheme plans for electricity and telecommunication infrastructure.	The Applicant disagrees that the proposal fails to demonstrate appropriate infrastructure and servicing arrangements. The Engineering Memorandum concludes that water, wastewater, stormwater, electricity and telecommunications infrastructure can be accommodated within the proposed development framework, with further utility design, servicing agreements and engineering approvals appropriately addressed through detailed design processes. The Applicant has also updated infrastructure documentation, servicing arrangements and vesting provisions in response to comments received. See Table 3 below for a summary of Tiaki Wai comments on the proposal, and the Applicant's response.
Parks and reserves	The Applicant considers that detailed design will have PCC oversight through engineering approval and vesting.

From a recreational perspective, the general size and layout of the reserves identified to be vested to Porirua City are generally appropriate. However, the locations of some proposed parks conflict with outcomes sought for the transport network, particularly the provision for future connections. There are concerns with the level of detail provided in the plans regarding parks, reserves, and tracks. Additional conditions of consent are needed to address these issues.	Further comment on the design of parks are addressed in a Parks Memorandum attached as Appendix H. Future roading connections are addressed in the Planning Memorandum in Appendix B, with additional consent notices proposed to ensure an east-west connection is not precluded.
Landscape, natural character and visual amenity The conclusions of the Landscape and Visual Effects Assessment provided with the application are generally agreed. However, the application has not addressed the effects of the cut faces proposed within the SH59 road reserve associated with the proposed intersection. Additional information, or consent conditions requiring that information, is required to address this area of the proposal.	These matters are addressed in a Landscape, Visual and Urban Design Memorandum attached as Appendix H. A new condition of consent is proposed requiring a SH59 Landscape Mitigation and Reinstatement Plan be prepared with input from NZTA for PCC's information (refer page 6 LVEA Memorandum in Appendix H).
Terrestrial ecology The proposal includes the protection of Significant Natural Areas (SNAs) on the development site as well as buffer areas around the SNAs, as required under the PDP, which is positive. However, some of these areas are within proposed road reserve, which will not enable them to be protected through the proposed conservation covenants. Additionally, the areas of SNA027 and SNA029 within the SH59 road reserve have not been appropriately addressed through the effects management hierarchy, with no offset mitigation proposed for the loss of the area of SNA029. The ecological advice provided to Porirua City by Wildlands identifies that clearance of indigenous forest within SNA027 will further fragment this already fragmented forest patch and therefore is not consistent with the NPS-IB.	Based on PCC comments, the scheme plan has been updated to put SNA buffer areas in recreation reserve rather than road reserve so the legal protections can be applied through conservation covenant. The Applicant considers that the effects of vegetation clearance were assessed in the Ecological assessment as outlined in the Planning Response Memorandum in Appendix B. Further comment on ecological effects is provided in Bluegreen Ecology's Memorandum in Appendix D, including how offset mitigation was proposed in the lodged application for vegetation clearance in SNA029.
Natural hazards The PDP identifies flood hazard areas on the development site. The application includes a flood assessment which provides mapping showing the flooding hazard risks will be appropriately managed within the site. However, based on draft comments from Tiaki Wai that I have reviewed, there are concerns that the stormwater discharges from the site may adversely affect flooding risks downstream of Taupō Swamp.	The Applicant disagrees that there is insufficient information to assess flood and geotechnical hazard effects. The Engineering Memorandum concludes that flood modelling demonstrates hydraulic neutrality and appropriate attenuation of peak flows, while refinements and corrections have been incorporated into the updated Flood Risk Assessment and Model Build Report. The Applicant maintains that the proposal appropriately manages flood risks and that

It is considered that geological hazards can largely be appropriately managed on the site through consent conditions; however, there remain two outstanding geotechnical issues relating to liquefaction potential and the proposed retention wetland embankments which have not been adequately addressed in the application.	further catchment-wide modelling is not necessary to determine the application. Geotechnical matters are addressed in a Geotechnical Memorandum attached as Appendix I. Changes to geotechnical conditions in response the T&T review on behalf of PCC as outlined in ENGEO Memorandum (refer Table 1 in Appendix I)
Transport There are several aspects of the design of the transport network that may have significant adverse effects on the wider transport network and need to be improved to ensure a safe and integrated network that provides for all users. These primarily relate to the form and function of the intersection with SH59, future transport connections within and at the boundaries of the site, providing for active and public transportation modes, and that the road network appropriately provides for bus public transport. These are fundamental issues that revised plans would need to be provided to address.	These matters are addressed in the Planning Memorandum in Appendix B, and a Transport Memorandum attached as Appendix G. Generally, the proposal is considered to be appropriate from a Transport perspective, however changes are proposed to consent conditions, including placing consent notices on titles of Lot 5003 to ensure future east west connection is not precluded.
Geotechnical Potential future adverse effects associated with geotechnical issues resulting from the large extent and volume of earthworks proposed are of concern. Geotechnical advice commissioned by Porirua City identified a number of areas where additional information was required in the application documents. Responses by the Applicant's geotechnical advisors and subsequent discussions have alleviated many of those concerns from a technical engineering perspective. Additional conditions of consent are required to address the technical matters raised.	These matters are addressed in a Geotechnical Memorandum attached as Appendix I. Changes to geotechnical conditions in response the T&T review on behalf of PCC as outlined in ENGEO Memorandum (refer Table 1 in Appendix I)
Contaminated land Hazardous Activities and Industries (HAIL) activities are identified as having been undertaken on the site. The application includes a Preliminary Site Investigation (PSI) and a draft Contaminated Site Management Plan (CSMP). Conditions are proposed to require a Detailed Site Investigation (DSI) and certification of the final CSMP prior to commencement of construction, as well as a Site Validation Report following completion of any remedial works required within each stage. At a general level, the PSI and draft CSMP are acceptable, and conditions can appropriately address the management of	These matters are addressed in a Contaminated Land Memorandum attached as Appendix J. Changes have been made to contaminated land conditions in response to SLR Consulting's review on behalf of PCC as outlined in PDP Memorandum (refer section 3.1.4 in Appendix F).

contaminated land on the site. However, expert technical review has identified additional matters that need to be addressed in the conditions. Amended conditions are appropriate to address these matters and ensure that any adverse effects will be acceptable.	
Historic heritage and archaeology No concerns have been identified in relation to historic heritage or archaeological effects. There are no historic heritage items, extents or settings identified on the site on the Porirua District Plan 2025 planning maps. The Applicant has provided an Archaeological Assessment of Effects and Addendum to the 2019 and 2022 Archaeological Appraisal reports carried out by Clough & Associates Ltd and applied for archaeological authority as part of the substantive application. Additional conditions requiring adherence to an accidental discovery protocol and submission of an Archaeological Management Plan approved by Heritage New Zealand Pouhere Taonga are appropriate. Conditions of consent are considered necessary to appropriately integrate with rather than duplicate the archaeological authority process.	The Applicant largely agrees with this statement. However, a proposed condition of consent relating to accidental discovery was removed in response to the Panel's suggestion in Minute 5, however the Applicant would accept an advice note referring to the archaeological authority to ensure the link is made between these separate approvals. Note that in response to Heritage New Zealand Pouhere Taonga comments an updated Archaeological Management Plan is attached as Appendix K.
Construction management and earthworks effects The proposed approach to management of construction effects through comprehensive management plans is generally appropriate. Some improvements are required to the draft plans provided with the application, including in relation to communication with the surrounding community. I consider requiring additional plans is appropriate, including site or stage specific plans to address particular constraints or potential adverse effects. This will require robust and enforceable conditions to ensure the management plans appropriately address all relevant adverse effects.	The Applicant generally agrees that robust construction management measures are required and has accepted a number of refinements to the management plan framework. The Engineering Memorandum supports certification of an overarching Earthworks Construction Management Plan, stage-specific management plans, enhanced monitoring and staged implementation measures, while maintaining that the existing earthworks and erosion and sediment control framework is comprehensive and capable of appropriately managing construction-related effects, including effects on Taupō Stream, Kakaho Stream and Te Awarua-o-Porirua Harbour. Further, the Planning Memorandum in Appendix B recommends a new condition requiring that temporary construction buildings are removed within one month of construction being completed in any given stage (refer page 10 Appendix 3 of the Planning Memorandum).

Reverse sensitivity The application has not addressed all potential reverse sensitivity effects. The application documentation identifies a helicopter hanger and helipad on the site within an area that will remain with the current landowner, with the assumption that the existing land uses will also continue. The helicopter hanger and helipad are within approximately 25 metres of proposed residential allotments and therefore the noise may generate effects on future residents of those allotments. Additional assessment of the potential effects is required. Following that, possible mitigation of the effects may also be required.	These matters are addressed the Planning Memorandum in Appendix B, as well as the Memorandum of Counsel in Appendix L. A new condition is proposed requiring noise modelling of any currently operating helicopter operations on Lot 5003 to determine any adverse effects on future residents of surrounding stages, and a requirement for a SQEP to determine any necessary acoustic insulation requirements to mitigate effects.
Economic The Applicant has provided an economic assessment. This states that construction of the proposal and post-construction activity will contribute to GDP and job creation, while the proposal itself will increase the range and affordability of new greenfield housing. It concludes that there will be significant benefits to Porirua City and Wellington region. No technical review of this assessment has been commissioned; however, I consider that the conclusions relating to positive economic effect are likely to be reasonable. However, it is noted that there are some assumptions made in the assessment that are not explained and may affect the scale of the positive economic benefits of the of proposal, particularly in relation to the affordability of housing in the district. Additionally, the economic costs of the proposal have not been quantified or assessed.	These matters are addressed in an Economic Memorandum attached as Appendix L. This Memorandum finds that the proposal makes efficient practicable use of land affected by topographical, environmental and infrastructure constraints. It provides a range of effective section sizes and can support dwellings of approximately 125 -225 m², from smaller two and three bedroom homes to larger four and five bedroom homes. Other developments and locations within Porirua can provide terraces, multi-unit dwellings, smaller homes and other price points. Mt Welcome will complement that supply through a substantial addition of standalone and compact standalone housing. The proposed dwelling limit is necessary to align development with infrastructure capacity and provide certainty for staging, purchasers, builders and project funding. Removing the restriction could materially increase the ultimate yield, infrastructure costs and delivery risk. Overall, the proposal will make a significant contribution to housing supply and competition while providing an appropriate range of housing for the site and its constraints.
Objectives and Policies Overall, I consider that, while the proposed development is consistent with some aspects of the PDP, it is inconsistent with or contrary to a number of key objectives	These matters are addressed in a Planning Memorandum attached as Appendix B. The Memorandum finds that all relevant objectives and policies were appropriately addressed in Appendix 5 to the Substantive Application,

and policies of the relevant planning documents. In particular, the proposed development is contrary to the Northern Growth Development Area chapter in the Porirua District Plan.	with the exception with the exception of the National Policy Statement for Infrastructure 2025 (NPS-I). The NPS-I came into effect in December 2025 between the withdrawal of the original application in November 2025 and re-lodgement in April 2026. Appendix 4 of the Planning memorandum provides an assessment of the NPS-I and finds that the proposal is consistent with the objective and relevant policies.
Assessment of the Porirua District Plan 2025 rules and standards The applicant's assessment of the rules and standards in the Porirua District Plan 2025 lacks detail and overlooks requirements for information to be provided with the application. As such, an assessment of the relevant rules and standards in the Porirua District Plan 2025 is attached at Appendix B. This identifies where there are differences to the assessment contained in the application.	These matters are addressed in a Planning Memorandum attached as Appendix B. While PCC has identified a number of areas where it considers further clarity or assessment is required, this Memorandum finds that the relevant consent triggers have correctly been captured in the lodged Substantive Application (refer to Appendix 3 of the Planning Memorandum). None of the matters identified by PCC alter the overall development concept, the nature of activities proposed, or the environmental effects that have been assessed.

Table 3: Te Rūnanga o Toa Rangatira (10) – relevant iwi authority FTAA section 53(2)(b)

Matters raised	Applicant response
Issue 1: Stormwater management Te Rūnanga is concerned that the proposed stormwater management relies too much on engineered solutions, such as constructed wetlands, which may undermine the integrity and mauri (life force) of natural waterways and wetlands. They believe the proposal does not adequately address hydrological control, risks increasing runoff and erosion, and lacks sufficient emphasis on water conservation and rainwater harvesting. There is also uncertainty due to limited baseline monitoring, and the current approach is seen as inconsistent with kaitiakitanga (guardianship) and the objectives of the Porirua Harbour Accord.	The Applicant acknowledges the cultural importance of the Taupō Stream, Taupō Swamp, Kakaho Stream and the wider Te Awarua-o-Porirua catchment to Ngāti Toa Rangatira, including the importance of protecting and enhancing the mauri of freshwater receiving environments. The Applicant considers that the proposed stormwater management approach represents the best practicable solution for the site and will deliver positive outcomes for the Te Awarua-o-Porirua catchment. The Applicant considers that the proposed stormwater management approach provides an integrated and site-responsive solution that achieves appropriate stormwater treatment, hydrological control and environmental enhancement outcomes. The system has been specifically designed to respond to the site's topography, geology and receiving environment, and incorporates a combination of raingardens, attenuation wetlands, erosion and sediment controls, and water quality treatment measures to manage stormwater effects and protect downstream freshwater environments. The Engineering Memorandum in Appendix C confirms that a wide range of water sensitive design options were assessed, including infiltration devices, permeable paving, distributed treatment systems and rainwater harvesting, but these were found to be impracticable due to the site's steep topography, low permeability soils, shallow groundwater and geotechnical constraints. The proposed integrated treatment train, including raingardens and gully-bottom wetlands, has been specifically designed to provide stormwater treatment, flow attenuation and hydrological control while responding to the site's natural drainage patterns. The Engineering Memorandum is supported by additional information in a Hydrology Memorandum attached as Appendix F.

Issue 2: Proposed roundabout and piping of Taupō Stream The iwi strongly opposes the plan to culvert and reclaim 110 meters of Taupō Stream for site access, as it would significantly impact the stream's mauri and cultural values, including traditional practices like mahinga kai (food gathering). They argue that the stream's current degraded state should not justify further loss, and that all waterways should be protected and enhanced. The proposal is seen as inconsistent with the statutory and cultural significance of the stream and the wider Te Awarua o Porirua catchment.	This matter is acknowledged as an issue of concern for Ngāti Toa in the Application, as well as the summary of outstanding issues in response to Minute 2. A further options assessment was undertaken in response to Minute 4. However, as outlined in the Planning Memorandum in Appendix B and the Memorandum of counsel in Appendix L, the Applicant considers that the proposed culverting option remains the most appropriate option currently available to provide access to the site.
Issue 3: Offsetting Proposal Te Rūnanga is not confident that the proposed ecological offsetting will achieve its intended outcomes, citing insufficient evidence, gaps in baseline data, and uncertainties about long-term management. They are particularly concerned about combining stormwater management with ecological offsetting, which they believe is inappropriate and does not uphold the intrinsic values of waterways. The iwi calls for a more robust, transparent, and separate approach to offsetting and stormwater management.	The Applicant considers that a robust package is in place with regard to offsetting. Further commentary is provided in the Ecological Assessment in Appendix D. In response to GWRC comments, the Applicant is proposing the inclusion of a consent condition an Ecological and Hydrological Management Plan (EHMP) to coordinate staging, wetland creation, offset delivery, monitoring, fish passage requirements and adaptive management, while maintaining that the proposed mitigation package itself is appropriate.
Issue 4: Protection of Archaeological Sites and Recognition of the Cultural Landscape While acknowledging efforts to identify and manage archaeological sites, Te Rūnanga notes that the scale of development limits opportunities to protect these features in situ. They emphasize the importance of engaging with Ngāti Toa regarding any culturally significant materials, such as those associated with the historic woolshed. The iwi also stresses that the cultural significance of Mt Welcome extends beyond recorded sites, encompassing the broader landscape and its ancestral connections, and urges the Panel to consider these wider values in its assessment.	The Applicant acknowledges the cultural significance of the area to Ngāti Toa Rangatira, and considers the proposal adequately provides for the management of these areas, subject to an updated Archaeological Management Plan (see Appendix K) and robust authority conditions (see Appendix 8 of the Planning Memorandum). The Applicant is continuing to engage with Te Rūnanga on these matters and a site meeting is planned with iwi representatives in the upcoming weeks to discuss opportunities to preserve culturally significant materials associated with the woolshed.

Table 4: Occupiers of the land to which the substantive application relates and the land adjacent to that land - FTAA section 53(2)(i)

Name	Matters raised	Applicant response
Megan D'Oliveira (03)	1. Iwi Consultation. Cultural Values and Te Tiriti o Waitangi Given the scale and significance of the proposed Mt Welcome development, I ask the Expert Panel to ensure that meaningful consultation has taken place with mana whenua and that the development is consistent with the principles and obligations of Te Tiriti o Waitangi. I request that the Panel considers whether local iwi have been appropriately involved in decision-making processes, including matters relating to cultural values, protection of significant sites, environmental management, waterways, native ecosystems and the long-term relationship between the development and the whenua. The development should demonstrate a genuine partnership approach with mana whenua, recognising matauranga Maori and providing appropriate opportunities for iwi involvement throughout planning, construction and future management of the development	The Applicant has worked closely with Te Rūnanga o Toa Rangatira throughout this process. See Table 3 above for a summary of their comments on the proposal, and the Applicant's response.
	2. Traffic and Road Safety Traffic is my greatest concern. A development of approximately 900 homes will create a significant increase in vehicle movements within a community that already has limited transport connections. I ask that all necessary road upgrades, intersection improvements and safety measures are completed before large numbers of homes are occupied. Traffic impacts should be independently monitored throughout each stage of development, with further improvements required if actual traffic volumes exceed predictions. Safe pedestrian and cycling connections should be prioritised, particularly routes used by children travelling to schools and local facilities.	Transport effects have been assessed in the Integrated Transport Assessment attached to the Application as Appendix 14. Further assessment and changes to conditions of consent have occurred post-lodgement with the Applicant confident that the application appropriately manages transport effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
	3. Emergency Access and Community Resilience Pukerua Bay has limited access and egress points. I ask the Panel to carefully consider how emergency services will safely access both the existing community and the new development during construction and once completed. Consideration must be given to situations where SH59 is unavailable due to crashes, severe weather, flooding, or other emergencies. Additional emergency access planning should be required if necessary.	

	4. Stormwater, Water Supply and Climate Resilience The development should demonstrate that drinking water, wastewater and stormwater systems have sufficient capacity for the proposed population increase and future growth. Given increasing risks from extreme weather events, climate resilience should be key consideration. Strong erosion and sediment controls must be maintained throughout construction to protect local waterways, streams and coastal environments.	Infrastructure design is outlined in the Infrastructure Report and Stormwater Management Strategy attached to the Application as appendices 9 and 11 respectively. Further assessment and changes to conditions of consent have occurred post-lodgement with the Applicant confident that the application appropriately manages three waters effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
	5. Protection of the Natural Environment Mt Welcome is an important natural area for Pukerua Bay. I ask that native vegetation, streams, wildlife habitats and landscape values are protected wherever possible. Ongoing ecological monitoring and long-term restoration planting using appropriate native species should form part of the development conditions.	Ecology and landscape effects are outlined in the Ecological Assessment and Landscape and Visual Effects Assessment and attached to the Application as appendices 15 and 21 respectively. Planting details are outlined in the Landscape and Ecology plans attached as Appendix 23 to the Application. Further assessment and changes to proposed consent conditions have occurred post-lodgement with the Applicant confident that the application appropriately manages landscape and ecology effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
	6. Effects on Existing Residents Although my property is not directly adjacent to the proposed development, I expect existing residents will experience changes from increased traffic, construction activity and greater pressure on local infrastructure. I ask consideration is given to the relationship between the new development and existing homes, including privacy, visual impacts, changes to the landscape, and maintaining the character of Pukerua Bay.	Landscape effects are outlined in the Landscape and Visual Effects Assessment and attached to the Application as Appendix 21. It is acknowledged that the development will change the character of the area, however this was anticipated through the plan change process to rezone the land for residential and commercial use. The Applicant considers that the character of the development will be wholly in keeping with the current [residential] zoning.
	7. Construction Management	Construction effects are outlined in the Earthworks Construction Management Plan attached to the

	Construction is expected to continue for many years. Strong conditions should be applied, including: • Limits on construction hours • Effective dust, noise and vibration management • Careful management of heavy vehicle movements • Clear communication with residents about construction activities • A dedicated community liaison person to respond to concerns and provide updates	Application as Appendix 10. The findings of this assessment have informed proposed consent conditions, noting that further refinement of conditions will occur prior to the decision.
	8. Community Infrastructure This development will place additional pressure on local schools, healthcare services, parks, recreation facilities and community amenities I ask that supporting infrastructure is planned, funded and delivered alongside the development so existing residents do not experience reduced access to services and facilities	These concerns echo those heard from the local community in pre-lodgement engagement. While these matters sit outside the consent process, The Applicant has engaged with the Ministry for Education (MoE) around schooling capacity, with a letter from MoE provided as Attachment 9 to Appendix 2 of the Application.
Rebecca Davis & Johnathan Burcell (17)	Does not meet the purpose of Fast Track legislation. The Mt Welcome Development Fast-track Application does not meet the purpose or intent of the Fast-track legislation. Specifically, this application does not show “significant regional or national benefits” as outlined in <i>Fast-track Approvals Act 2024 purpose</i>.	The Applicant disagrees with this statement and considers that the proposal meets the purpose of the FTAA as outlined in section 3.1.2 of the Application.
	Does not meet the criteria of NPS UD. The National Policy Statement on Urban Development supports development in locations that have good access to existing services, public transport networks and infrastructure. In our opinion, the proposed development does not fit these criteria. Specifically parking space at Pukerua Bay Railway Station (no ability to expand) and limited Pukerua Bay School capacity. The applicant assumes incorrectly that parking for cars at the Pukerua Bay Railway Station will cope with 900 plus extra houses. There is no space to make that car park bigger. The Ministry of Education upper limit for Pukerua Bay enrolment is approximately 225 pupils. The current role is 168. The future households from the PBLP development (already underway) will easily fill this. Delays in land acquisition by the MoE will see problems similar to that being faced by Plimmerton School as it will have to cope with from the Plimmerton Farm development.	The Applicant disagrees with this statement and considers that the proposal is consistent with the NPS-UD as outlined in Appendix 5 of the Application (refer page 3 onwards).
	Erosion of Local Democratic Voice and Lack of True Public Consultation. The Fast-track process means we could lose our opportunity to provide local input for a period of up to 15 years. By applying through the fast-track mechanism, the applicant	The Applicant has undertaken significant engagement with the community as outlined in Appendix 2 of the Application. This builds on

	reduces the avenue for comprehensive community feedback. Decisions of this scale should align closely with the Porirua City Council Growth Strategy and a clear public hearing process, ensuring local residents are not forced to bear the long-term environmental costs of rushed developer decisions.	engagement with the community through the rezoning process itself.
	Extreme Infrastructure Strain on Pukerua Bay. Pukerua Bay's existing infrastructure cannot handle a project of this magnitude without guaranteed, fully integrated, upfront network upgrades that protect local supply and prevent sewer overflows during heavy rain events.	Infrastructure design is outlined in the Infrastructure Report and Stormwater Management Strategy attached to the Application as appendices 9 and 11 respectively. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages infrastructure effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
	Transport and Traffic Safety: Adding 900+ households will funnel thousands of daily vehicle movements onto State Highway 59 and Muri Road. The proposed transport connections must be fully aligned with Waka Kotahi (NZTA) safety margins, rather than compressed to fit fast-track timelines. The developer notes the proximity of Pukerua Bay as a means of connection to services and has included Muri Road as a collector road. Muri Road must not be considered as a collector road to service an additional 900 plus dwellings. It is totally unsuitable to carry such a possible traffic load. Muri Road does not meet NZTA guidelines.	Transport effects have been assessed in the Integrated Transport Assessment attached to the Application as Appendix 14. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages transport effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
	Pāuatahanui Inlet, Porirua Harbour, Pukerua Beach Risks. Runoff from massive earthworks across the 195-hectare site poses a severe threat to downstream catchments. The local community previously advocated for strict environmental controls under Porirua City Council's District Plan. Bypassing processes risks severe sediment pollution flowing into sensitive marine areas, including the Pāuatahanui Arm of the Porirua Harbour and Taupo Swamp. We are concerned the Muri Block will be used by the developer for 'soil storage'. Waimapihi Stream has its headwaters in this area. Our neighbours and wider Pukerua Bay residents have already regularly observed (and are reporting) the failure of silt retention measures taken by the PBLP development. Increased runoff of silty water from this current development has	Construction effects are outlined in the Earthworks Construction Management Plan attached to the Application as Appendix 10. The findings of this assessment have informed proposed consent conditions, noting that further refinement of will occur prior to the decision.

	pooled in the stream alongside Muri Road, eroded the stream banks in the Takutai Reserve and has flowed into Pukerua Bay Beach.	
	Ecological Impact on Fragile Native Environments. The fast-track application notes proximity to native vegetation and natural landscapes. While acknowledging the intent to provide housing, the fast-track poses a severe risk of ecological fragmentation. The footprint of the 900 lots, associated roading networks, and large-scale earthworks risks severing continuous native vegetation paths. Linear corridors must remain physically contiguous to allow native fauna (particularly birds and lizards) to move safely between the SNA areas. I have previously submitted on this point during the PCC District Plan process and Ecological Connections have been added to the PCC District Plan Structure Plan and these must be upheld.	Ecology effects are outlined in the Ecological Assessment attached to the Application as Appendix 15. Further assessment and changes to proposed consent conditions has occurred post-lodgement with the Applicant confident that the application appropriately manages ecology effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
	Peer-review and Independent Oversight. Before any decisions are made, we ask that an independent review be conducted of all design proposals and calculations in this high-risk area, and ensure compliance monitoring is capable of identifying and dealing quickly with emerging problems, especially during construction.	The Applicant considers that the FTAA process provides for peer-review and oversight with final decisions sitting with an Independent Expert Hearing Panel.
	Mandatory Ecological Corridor Buffers: If consent is considered, we seek that the Expert Panel legally mandate wide (50 metre), contiguous open-space buffers that directly connect the designated SNAs, in strict adherence to the Porirua City Council's overarching Northern Growth Area blueprint. No earthworks should be permitted within these mapped ecological connections. See below the image showing ecological connections on PCC Structure Plan that has been prepared as part of District Plan Variation 1.	Alignment with the Structure Plan is addressed in Appendix 8 to the Application. This assessment finds that ecological buffers and corridors are provided in accordance with the Structure Plan.
	Protection in Perpetuity: If consent is considered, we seek that the Expert Panel ensure the requirement that all designated ecological corridors, stream and freshwater management areas and gully networks, and SNA buffers within the project boundaries be permanently fenced, legally protected and fully restored with native planting.	The proposal provides for management of existing SNA, including legal protection in perpetuity for these areas through conservation covenants.
	Absolute Sediment Containment. We seek that the Expert Panel decline the application for the Mt Welcome development unless it can guarantee absolute sediment containment during heavy weather events. Fast-track timelines often compromise this.	Construction effects are outlined in the Earthworks Construction Management Plan attached to the Application as Appendix 10. The findings of this assessment have informed proposed consent

		conditions, noting that further refinement of will occur prior to the decision.
	Traffic Safety Upheld. We seek that any transport connections be fully aligned with Waka Kotahi (NZTA) safety margins, rather than compressed to fit fast-track timelines.	Transport effects have been assessed in the Integrated Transport Assessment attached to the Application as Appendix 14. This includes engagement with NZTA as outlined in Appendix 2 of the Application. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages transport effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.

Table 5: Minister for the Environment and other relevant portfolio ministers - FTAA section 53(2)(j)

Minister	Matters raised	Applicant response
Minister for Rail (02)	No comment	N/A
Minister for Infrastructure (04)	The Minister for Infrastructure supports the proposal	The Applicant agrees with the Minister's comments.
Minister for Building & Construction (07)	The Minister of Building & Construction supports the proposal	The Applicant agrees with the Ministers comments.
Associate Minister for Transport (11)	The Associate Minister for Transport supports the proposal	The Applicant agrees with the Minister's comments.

Table 6: Relevant Administering agencies - FTAA section 53(2)(k)

	Matters raised	Applicant response
Heritage New Zealand (09)	No further comments to those provided under s51.	N/A
Department of Conservation (19)	Site access/State Highway 59 intersection form DOC considers that a signalised intersection may represent the most appropriate option, as it appears capable of avoiding direct adverse effects on the Taupo catchment from both freshwater and terrestrial perspectives. DOC recommends that the Panel request's further information from the Applicant and NZTA setting out the alternative access options considered, including a detailed assessment of the feasibility of a signalised intersection.	The Applicant disagrees that further assessment of a signalised intersection is required. The Applicant considers the roundabout remains the only practicable access solution currently available. The Applicant's legal memorandum and planning evidence notes that NZTA requires a dual-lane roundabout as the appropriate long-term intersection treatment, and concludes that there is a functional need for the proposed location notwithstanding theoretical alternatives. Refer to Planning Response Memorandum in Appendix B and Memorandum of Counsel in Appendix L.
	Resource Consent Conditions: DOC is of the view that conditions of consent must specify clear environmental outcomes and objectives for management plans. Conditions of consent should provide acceptable levels of performance standards (for example, monitoring parameters). The purpose of a management plan is to specify how objectives specified in the conditions will be met. In addition, management plans should include a methodology of how acceptable environmental limits are to be achieved. The proposed resource consent conditions fall short of using these good practice methods, particularly the format, that include mechanisms a-i above. For example, conditions 40-48 of the proposed district consents conditions package manage effects on lizards and birds, however, the effects on lizards and birds should also be considered within their individual management plan.	The Applicant agrees that a more integrated management framework is appropriate. The Ecological Memorandum in Appendix D supports a new condition requiring an Ecological and Hydrological Management Plan (EHMP) to coordinate wetland creation, offsetting, monitoring, fish passage and staging, while the Applicant does not support duplicative or unnecessarily onerous management plan requirements.

	In addition, DOC also notes the applicant has not provided a Wetland Management Plan in relation offsetting and compensation set out in the Ecological Assessment. DOC recommends the Panel request the Applicant to provide conditions for wetlands in accordance with a-i above, as well as a draft wetland management plan.	
	Terrestrial Ecology: DOC recommends the Panel requests the Applicant to provide an offsetting model using the BOAM model to ensure the effects relating to the proposed vegetation clearance are managed accurately, and appropriately.	The Applicant disagrees that a BOAM assessment is necessary to demonstrate appropriate offsetting. In the Ecological Memorandum in Appendix D, Dr Keesing explains that the affected vegetation comprises a very small area relative to the wider SNA and that the proposed 3:1 offset ratio is proportionate to the condition and scale of the affected vegetation.
	Lizards: DOC is of the opinion that with the proposed lizard management, the Project will result in a residual significant adverse effect on lizards. Outside of SNAs, the NPS-IB requires the implementation of the effects management hierarchy, including offsetting and compensation where adverse effects cannot be avoided, remedied, or minimised. DOC is not aware of the application providing an effects management package in the project description, or resource consent conditions. DOC recommends that the Panel request further information on this matter from the Applicant. On this basis, DOC has not provided any specific consent condition amendments relating to lizard management.	The Applicant disagrees that additional lizard offsetting, monitoring, fencing or receiving-site investigations are required beyond the amended approach proposed by the project herpetologist. In his Memorandum in Appendix E, Mr Payne concludes that lizard effects are low and proportionate to the limited extent of habitat affected, and has nevertheless amended the Lizard Management Plan in response to DOC and PCC comments, including increased salvage effort, additional spotlight surveys, expanded predator control measures, enhanced reporting requirements, revised release site management, and additional contingency provisions. He maintains that the project will provide a net gain in lizard habitat exceeding a 3:1 ratio relative to affected habitat and that the amended Lizard Management Plan provides an appropriate and proportionate response to effects on lizards.

	Long-Tailed Bats: DOC agrees with the recommendations provided by Wildlands and recommends that the Applicant adopts a precautionary approach by undertaking acoustic bat monitoring to confirm whether bats are present within the site. If the Panel directs this and LTB are detected within the site, the Department recommends the following: • The applicant uses the site-specific survey to inform an effects management response in accordance with the NPS-IB; • The applicant provides a Bat Management Plan, which addresses the following matters (but is not limited to); ○ Identification of all or confirmed bat roost or roosting features; ○ Tree removal methodology and timing for all confirmed or potential bat roost trees which are proposed to be removed, with regard to DOC’s “Protocols for minimising the risk of felling occupied bat roosts”, produced by the NZ DOC Bat Recovery Group 2024, or any other update to that document; ○ Details of proposed effects management including any offsetting or compensation to ensure that the development achieves a no net loss outcome for long-tailed bat habitat values; ○ Procedures for certification, review, and amendment of the BMP, including an opportunity for DOC to comment; and ○ The requirement for the BMP to be prepared by a suitably qualified and experienced person. Regardless of the recommendation for acoustic bat monitoring, DOC recommends that imposition of consent conditions in accordance with the DOC bat recovery group’s protocols for minimising the risk of felling occupied bat roosts.	The Applicant disagrees that acoustic bat monitoring is necessary prior to approval. In the Ecological Memorandum in Appendix D, Dr Keesing considers bat presence highly unlikely given the absence of local records and limited habitat suitability, and in the very unlikely case bats were detected then the resultant actions to be taken by the developer is management through the DOC tree felling protocol or the EHMP.
	Freshwater values: DOC recommends the Panel request further information from the Applicant for the following information:	The Applicant disagrees that wetland and stream values have been underestimated.

	• Clarify which wetlands qualify for the pastoral exclusion criteria, and map any wetlands that do not qualify but meet the definition of a natural inland wetland alongside all other natural inland wetlands; • Undertake hydric soil assessments to confirm wetland status; and • Provide an updated effects management package in accordance with clause 3.22 of the NPS-FM, reflecting the updated wetland information and assessment findings. DOC recommends that further fish sampling should be undertaken under normal base flow conditions, along with a replicated wider spatial scale eDNA survey.	The Ecology Memorandum in Appendix D addresses DOC's concerns regarding wetland delineation, hydric soil testing, additional wetland mapping, fish surveys and effects assessment methodology, concluding that sufficient survey information has been collected and that the effects management package is proportionate to the ecological values present.
	Use of EIANZ Guidelines: DOC raises concerns regarding the applicant's application of the EIANZ Ecological Impact Assessment Guidelines when assessing the magnitude of wetland loss, and considers that the applicant's assessment may not appropriately reflect the scale of ecological effects associated with the proposal.	The Applicant disagrees that the EIANZ Guidelines have been incorrectly applied. Dr Keesing confirms that EIANZ methodology informed the ecological assessment and continues to support the wetland value, magnitude and effects conclusions reached in the Application.
	Provision for Fish Passage: DOC recommends the Applicant reconsiders the culvert design to ensure fish passage is provided across the entire Project. It is also recommended that fish passage is provided in accordance with the New Zealand Fish Passage Guidelines.	The Applicant agrees that fish passage should be provided where ecologically justified. Dr Keesing supports fish passage conditions for the Taupō Stream culvert and retention wetlands B and E, but does not support requiring fish passage in all waterways irrespective of fish presence, nor duplicative DOC certification requirements where those matters are already regulated through regional consent conditions.
	Offsetting and compensation for loss of wetland extent: DOC does not support the proposed offset, noting the offset does not provide for a 1:1 ratio. DOC also notes the applicant has not provided any consent conditions which set out how the proposed offset will be implemented, including performance	The Applicant disagrees that the proposed wetland offset package is inadequate. Dr Keesing concludes that while the package focuses on significant enhancement of existing wetland systems rather

	targets to achieve a no net loss or preferably a net gain. It is recommended the Applicant includes conditions setting out wetland offsetting performance targets, with a subsequent Wetland Management Plan condition with the purpose to: • describe the methods that will be employed to ensure compliance with offsetting performance targets; and • describe the methods to identify and monitor the presence/absence of indigenous aquatic species identified in the ecological assessment. DOC also recommends the inclusion of an offset monitoring review as a condition of consent, which would occurring across multiple years following the completion of the wetland offset. This monitoring review should identify whether further actions are required to achieve the performance targets. If the performance targets are not met, further amendments to the wetland management plan would be required. The Ecological assessment proposes the creation of a 5m wide woody indigenous riparian margin to 50% of the wetland gullies and stormwater lakes. DOC supports the creation of wetland buffers. However, opposes a width of 5m and notes a buffer of at least 10 metres is generally necessary to enable indigenous vegetation succession that should requires minimal maintenance and to enhancement of aquatic functions.	than creation of new wetland extent, the proposed remediation, restoration and offset measures will deliver a substantial net ecological gain and are consistent with the NPS-FM effects management hierarchy In response to GWRC comments, the Applicant is proposing the inclusion of a consent condition an Ecological and Hydrological Management Plan (EHMP) to coordinate staging, wetland creation, offset delivery, monitoring, fish passage requirements and adaptive management, while maintaining that the proposed mitigation package itself is appropriate.
	Wetland remediation and rehabilitation: DOC notes the Applicant has not proposed the these measures within a specific wetland management plan or within the resource consent conditions. It is noted the proposed effects management package for indigenous vegetation removal associated with the proposed roundabout has been set out within its own management plan. For consistency in approach DOC recommends that these requirements are imposed within a Wetland Management Plan and included within the resource consent conditions	The Applicant agrees that implementation certainty should be strengthened. The Applicant supports a new condition of consent requiring an EHMP that identifies wetland remediation, offsetting, monitoring, fish passage and staging requirements, but considers that a separate stand-alone wetland management framework beyond that is unnecessary.

Table 7: New Zealand Transport Agency Waka Kotahi (13) - FTAA section 53(2)(I)

Matters raised	Applicant response
The Proposed Transport Connection to SH59 NZTA supports the proposed staged access approach in principle, subject to: a. The construction of the interim intersection prior to construction and enabling works, and b. confirmation of the appropriate development trigger for upgrading from the interim priority T-intersection to the permanent dual-lane roundabout.	The Applicant agrees in principle with NZTA's position. The Transport Memorandum attached as Appendix G confirms that the interim intersection can safely accommodate initial construction activity and staging, and supports retention of the 110-lot threshold, noting this is consistent with the NZTA Planning Policy Manual and that the interim right-turn bay treatment provides an appropriate balance of safety and practicality before delivery of the permanent roundabout.
Response to Minute 4 of the Expert Panel and the Applicants Response NZTA agrees with the Applicant that a dual-lane roundabout is required as the permanent intersection solution, with NZTA involvement expected in any further refinement of its location and design.	The Transport Memorandum attached as Appendix G records that alternative intersection forms, including signals, were considered but were not supported by NZTA due to the classification, speed environment and operational function of SH59, while the Planning Memorandum and Memorandum of Counsel conclude that this supports the functional need for the proposed crossing of the Taupō Stream.
Water Quality and Stormwater Discharges Stormwater and water quality matters require further resolution, including treatment performance, asset ownership and maintenance responsibilities.	The Applicant agrees that some refinement of stormwater management details, asset ownership arrangements and maintenance responsibilities is appropriate. In response to comments received, the Applicant has provided additional stormwater design verification, expanded optioneering, updated stormwater management documentation, revised vesting arrangements, additional easements, and design refinements including increased maintenance access widths. These are outlined in the Engineering Memorandum in Appendix C. Overall, the Engineering Memorandum concludes that the proposed stormwater treatment train, hydrological controls and attenuation system are technically robust and represent the best practicable option for the site's topography, geology and receiving environment. The Applicant maintains that the proposal will appropriately manage water quality and stormwater effects while providing

	an environmental improvement over the existing situation and does not require fundamental redesign.
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Table 8: FTAA section 53(2)(m) parties

	Matters raised	Applicant response
Game Animal Council (01)	The area does not contain any significant herds of interest, however game animals in this area likely provide a source of meat for some local communities. We ask that hunter access and values are considered in project planning, including access to hunting areas where applicable. If the scope of the project changes, and there is a possibility of increased impact on hunter access or opportunities, please get in touch. Otherwise, we do not require further consultation on this application. We will advise you if we hear of any concern in the hunting sector as a result of this project.	The Applicant confirms that the Site does not contain any hunting species, and is being developed for residential and commercial use. The remaining land is being retained for rural activities. The only publicly accessible land is proposed to be vested a recreation and drainage reserve where hunting is not permitted anyway.
Wellington Conservation Board (14)	Ecological Assessment and Areas of Concern The principal unresolved issues remain: - the extent and ecological significance of indigenous vegetation loss; - the adequacy of surveys for lizards and potential bat habitat; - the justification for biodiversity offset calculations; - whether the proposed mitigation and management plans are sufficiently robust to achieve no net loss of indigenous biodiversity. Board recommendations: - Apply the precautionary principle where ecological uncertainty remains - Undertake further ecological investigation where significant information gaps have been identified - Strengthen long-term protection and monitoring of indigenous lizards and their habitat - Require ecological monitoring, adaptive management and independent review throughout project implementation	The Applicant disagrees that further ecological investigations are required before the application can be determined. The Ecology Memorandum in Appendix D concludes that sufficient information has been collected to assess effects and develop appropriate mitigation and offsetting measures, while proposed amendments including an Ecological and Hydrological Management Plan (EHMP), monitoring, and adaptive management provisions provide additional implementation certainty.
	Significant Natural Areas Board recommendations: - Double the planned offset planting along riparian margins (SNA 027) to protect stream banks from erosion, reduce sediment load and protect and enhance indigenous freshwater species including giant kōkopu, inanga, longfin eel and redfin bully. - Double the planned offset planting around SNA029 and SNA 225, both containing significant indigenous forest remnants protected under QEII covenants.	The Applicant agrees that long-term protection and enhancement of SNAs is important and considers that the proposal takes an appropriate approach to managing effects. The proposal provides for legal protection of retained SNAs through conservation

	• Protect SNA 029, a privately owned block comprising rare tall canopy indigenous forest, with predator-proof fencing • Place restrictions on cat ownership across the whole planned subdivision	covenants, restoration planting, riparian enhancement and predator management, however the Applicant does not support the need for predator-proof fencing, mandatory cat restrictions or doubling all proposed planting widths as these measures are not considered necessary to achieve acceptable ecological outcomes.
	Wetlands and Freshwater Biodiversity The Board is particularly concerned about: • sediment entering streams during prolonged earthworks; • stream realignment reducing habitat complexity; • culverts affecting fish passage; • impacts on aquatic invertebrates through increased fine sediment; • cumulative degradation of freshwater habitat. Board Recommendations: • Strengthen protection and restoration of wetlands and indigenous vegetation • Requiring measurable improvement in freshwater ecosystem health, including fish passage and aquatic habitat • Increase riparian buffer widths • Design all stream crossings for full fish passage • Monitor freshwater fish and macroinvertebrates	The Applicant agrees with the objective of improving freshwater ecosystem health but disagrees that additional investigations or a fundamentally different mitigation package are required. The Ecology Memorandum in Appendix D concludes that the proposed wetland restoration, stream enhancement, fish passage provisions, monitoring and offset package will result in a substantial net ecological gain, with additional implementation certainty provided through the proposed EHMP and revised consent conditions.
	Ecological Connectivity and Downstream Effects Board Recommendations: • That cumulative sediment effects across the wider catchment be explicitly assessed, mitigation measures applied, and downstream monitoring continue throughout the entire construction period • Encourage nature-positive urban design that delivers measurable biodiversity gain and long-term ecological resilience. • Require either a maximum five-year implementation period or mandatory independent ecological reviews at five-year intervals throughout implementation, to enable adaptive management if monitoring identifies unforeseen adverse effects or ecological outcomes differ from those predicted.	The Applicant disagrees that a five-year implementation limit is necessary. The Ecology Memorandum and Planning Memorandum support a staged implementation framework with monitoring and adaptive management.

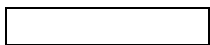


Table 9: Other invited parties - FTAA section 53(3)

Matters raised	Applicant response
Te Awarua-o-Porirua Harbour and Catchments Community Trust and Guardians of Pāuatahanui Inlet (05)	
There is no case for approving the Mt Welcome development at this time and especially in the proposed relatively isolated and inappropriate location;	The appropriateness of the land for residential and commercial use was confirmed through the growth planning and rezoning process which was led by PCC (see planning context in section 3.2 of the Substantive Application). There is demand for housing and business land as outlined in the Economic Assessment provided with the Application as Appendix 13.
If approved, the consent duration should be no more than five years and for a limited part of the proposed development;	These matters are addressed in a Planning Memorandum attached as Appendix B.
Erosion and sediment movement poses major risks on this rolling to steep hill country site, especially during construction;	Construction effects are outlined in the Earthworks Construction Management Plan attached to the Application as Appendix 10. The findings of this assessment have informed proposed consent conditions, noting that further refinement of will occur prior to the decision.
There are potential problems with stormwater management and disposal including increases in stream erosion, groundwater infiltration, and the creation of wetland - stormwater treatment areas in stream channels;	Infrastructure design is outlined in the Infrastructure Report and Stormwater Management Strategy attached to the Application as appendices 9 and 11 respectively. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages infrastructure effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
Wastewater disposal proposals seem superficial and inadequate given the acknowledged over capacity limits posed by the downstream systems;	
Climate change induced storms and heavy rainfall pose extra risks to the Mt Welcome site. We consider an independent review should be conducted of all the design proposals and calculations in this high-risk area, plus ensuring compliance monitoring can identify and deal quickly with emerging problems, especially during construction.	
Significant Natural Areas need protection and special protection measures are needed for the Pukerua South Bush;	Ecology effects are outlined in the Ecological Assessment attached to the Application as Appendix 15. Further assessment and changes to proposed consent conditions has occurred post-lodgement with the Applicant confident that the application appropriately manages ecology effects

	associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
Friends of Taupō Swamp and Catchment Incorporated (06)	
Duration of the Consents. We consider that any consents should be limited to 5 years, not the 15 years proposed by the applicant.	These matters are addressed in a Planning Memorandum attached as Appendix B.
Erosion and sediment. - We urge the Panel to ensure that the measures in the application (ie stage specific erosion, sediment control) are more than able to deal with the risks which may arise. - This is another reason to set a much shorter consent period so the monitoring process is able to trigger any necessary & timely protections/ adjustments to site work over the years. - As is mentioned in the CARDNO report, strict management and compliance monitoring should be imposed on any future resource consents. This would include the strict oversight of a possible re alignment of the Taupō Stream as in Minute 4 (6 July 2026)	Construction effects are outlined in the Earthworks Construction Management Plan attached to the Application as Appendix 10. The findings of this assessment have informed proposed consent conditions, noting that further refinement will occur prior to the decision.
Stormwater We ask the Panel to adopt the matters included in the GOPI/ PHT suggestions for reducing stormwater outflows, but also to insist that the applicant takes extra measures to ensure against overwhelming the proposed system. Such extra measures could include: - All households required to install a 10,000-litre holding tank for stormwater retention and non-potable use. This adds to the critical retention of the first flush during heavy rainfall events. (See Note to Panel below**) - Reduction of the onsite impervious surfaces' ratio: currently 75% for each residential lot, 90% for each industrial	Infrastructure design is outlined in the Infrastructure Report and Stormwater Management Strategy attached to the Application as appendices 9 and 11 respectively. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages infrastructure effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.

lot. We consider this to be too high and that a 50% cap should be the maximum.	
Wastewater We, along with other submitters, see that the applicant acknowledges that the downstream wastewater network (into which the Mt Welcome system will drain) is near or beyond its capacity. This situation raises questions such as: the need for a long-term adequate waste water system to cope with the needs of the development, and the assurance that there will be no stormwater intrusion into the system.	
Protection of the three SNAs adjacent to the proposed development It is the Pukerua South Bush (SNA 029) which our members wish to bring to the notice of the Panel. • We urge, at the very least, that the developers must surround the whole site with proven predator proof fencing and • Plant a shelter belt of appropriate native trees to replace the aged macrocarpa on the north side, which will in turn give the wind protection, needed after vegetation clearing for housing. • We also urge the Panel to set standards as in some other areas in NZ: ie not allowing the ownership of cats, or at least limiting cat ownership to those land owners who can prove they have 'Catios'- or similar. And that this is monitored in perpetuity. • Without such measures in place, this particular SNA could well be degraded. We urge the Panel to look more closely at any additional protections to mitigate the effects of the proposed development on this unique SNA.	Ecology effects are outlined in the Ecological Assessment attached to the Application as Appendix 15. Further assessment and changes to proposed consent conditions has occurred post-lodgement with the Applicant confident that the application appropriately manages ecology effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
Minute 4, 6 July 2026: re site visit and possible culverting of the Taupō Stream for over 100 metres in length.	This matter is acknowledged as an issue of concern for Ngāti Toa in the Application, as well as the summary of outstanding issues in response to Minute 2. A further options assessment was undertaken in response to Minute 4. However, the applicant considers that the proposed

We note & applaud the opposition to this proposal from Te Rūnanga a Toa Rangatira. • FOTSC strongly objects to the idea of stream culverting. • Stream realignment would seem a last resort. It is a measure which would risk loss of biodiversity and downstream sediment. We oppose this back-up plan. • This solution would impact yet another SNA (SNA027). • Our organisation finds it intolerable that the applicant can expect so many discretionary entitlements, when so much volunteer time and energy is given by the community when it comes to protection and enhancement of the locale in which we live	culverting option remains the most appropriate option currently available to provide access to the site.
Climate Change Our group is seeing the results of climate change right now in the Taupō Stream and its Catchment. Whilst the applicant acknowledges that climate change is included in its designs, we concur with the submission from GOPI and PHT re erosion controls, sediment and stormwater management. Before any decisions are made, we request the Panel consider an independent review which should examine all of the design proposals and calculations in this high-risk area. Moreover, we want an assurance that compliance monitoring is capable of identifying and dealing quickly with emerging problems, especially during construction.	The Applicant considers that the FTAA process provides for peer-review and oversight with final decisions sitting with an Independent Hearing Panel.
Pukerua Bay Residents Association (12)	
PKBRA believes there is no case to Fast-track the Mt Welcome development and requests the Expert Panel to decline the application at this time for these reasons: The Mt Welcome Development Fast-track Application does not meet the purpose or intent of the Fast-track legislation. Specifically, this application does not show “significant regional or national benefits” as outlined in Fast-track Approvals Act 2024 purpose.	The Applicant disagrees with this statement and considers that the proposal meets the purpose of the FTAA as outlined in section 3.1.2 of the Application.

1. The National Policy Statement on Urban Development supports development in locations that have good access to existing services, public transport networks and infrastructure. In our opinion, the proposed development does not fit these criteria.	The Applicant disagrees with this statement and considers that the proposal is consistent with the NPS-UD as outlined in Appendix 5 of the Application (refer page 3 onwards).
2. PKBRA supports the points made by Porirua Harbour and Catchments Trust/Guardians of Pāuatahanui Inlet (PHCT/GOPI) in the general section of their submission regarding the location and isolation of the proposed development, and of current population growth.	The appropriateness of the land for residential and commercial use was confirmed through the growth planning and rezoning process which was led by PCC (see planning context in section 3.2 of the Substantive Application). There is demand for housing and business land as outlined in the Economic Assessment provided with the Application as Appendix 13.
3. The Fast-track process means we could lose our opportunity to provide local input for a period of up to 15 years.	The Applicant has undertaken significant engagement with the community as outlined in Appendix 2 of the Application. This builds on engagement with the community through the rezoning process itself.
However, should the Panel decide the application or parts of it should progress under the Fast-track Legislation 1. PKBRA opposes the 15-year duration for all development consents. Should consents be granted they should be limited to five years.	These matters are addressed in a Planning Memorandum attached as Appendix B.
2. PKBRA asks the Expert Panel to closely consider the lack of services required to cater for the proposed development, specifically parking space at Pukerua Bay Railway Station and limited School capacity.	These concerns echo those heard from the local community in pre-lodgement engagement. While these matters sit outside the consent process, the Applicant has engaged with the Ministry for Education (MoE) around schooling capacity, with a letter from MoE provided as Attachment 9 to Appendix 2 of the Application.
3. PKBRA urges the Expert Panel to address our residents' concerns about increased road safety issues.	Transport effects have been assessed in the Integrated Transport Assessment attached to the Application as Appendix 14. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages transport effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
4. PKBRA opposes the connector roads planned to connect the proposed Mt Welcome development through the Pukerua Bay Limited Partnership and onto Muri Road	The proposal provides a collector road to the northern boundary of the site in line with the Structure Plan in the Northern Growth Development Area Chapter in the Porirua District Plan.
5. Address protection of all the Significant Natural Areas (SNAs), and other vulnerable areas within/adjacent to the proposed development: Taupō Swamp, Waimapihi Stream, Ara Harakeke/Te Araroa Trail.	Ecology effects are outlined in the Ecological Assessment attached to the Application as Appendix 15.

	Further assessment and changes to proposed consent conditions has occurred post-lodgement with the Applicant confident that the application appropriately manages ecology effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
6. PKBRA requests the Expert Panel to address its concerns about the environmental damage from earthworks, erosion, water runoff during and after construction.	Construction effects are outlined in the Earthworks Construction Management Plan attached to the Application as Appendix 10. The findings of this assessment have informed proposed consent conditions, noting that further refinement of will occur prior to the decision.
7. Should the development go-ahead, at the very least, PKBRA wants the Expert Panel to recognise the importance of the name for the new development, to be directed by Ngāti Toa.	The Applicant has worked closely with Te Rūnanga o Toa Rangatira throughout this process. See Table 3 below for a summary of their comments on the proposal, and the Applicant's response.
8. PKBRA wants the Expert Panel to conduct an independent review of the development proposals and calculations as regards issues which may arise during construction.	The Applicant considers that the FTAA process provides for peer-review and oversight with final decisions sitting with an Independent Hearing Panel.
Plimmerton Residents Association (16)	
Roading network We have concerns regarding: (1) The proposed temporary Tee-intersection for site access with SH59, particularly in the site development and construction period before the roundabout is built (i.e. before 110 houses have been established). Possible actions could be: • require a reduction in speed limits in this area from the start of site development; • extend the northbound merge lane for traffic heading north from the site towards Pukerua Bay; • ensure the turn and merge lane widths and lengths are adequate for heavy construction vehicles (ie double trailer trucks); require signage to be erected to warn traffic on SH59 of the intersection and turning traffic hazard.	Transport effects have been assessed in the Integrated Transport Assessment attached to the Application as Appendix 14. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages transport effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision. The Applicant notes that NZTA supports the proposed staged access approach in principle (refer Table 7 above and NZTA's comments).
Grays Road We do not consider that Grays Rd is a suitable route for truck movements to and from the site and consent conditions should require that an alternative route such as SH58 be used. The	The Applicant agrees that construction traffic effects should be carefully managed, noting that Grays Road is unlikely to be utilised with SH58 and SH59 providing better options for trucks.

references to Grays Rd as an “Arterial Road” should be checked, and either removed from the documents or put into context as not being suitable for heavy traffic. If construction traffic is consented to use this road, consent conditions should be required to restrict heavy traffic movements, and to ensure that in the event of construction traffic damaging the road or the environment, the cost will lie with the developer or transport operator, not ratepayers.	The Transport Memorandum in Appendix G concludes that potential effects associated with heavy vehicle movements can be appropriately managed through the Construction Traffic Management Plan (CTMP), which will identify haulage routes, any necessary restrictions on vehicle movements, and traffic management measures to be implemented in consultation with the relevant road controlling authorities.
Infrastructure We are concerned that consenting additional development on top of the Plimmerton Farm development will add stress to an already fragile system. We ask that infrastructure upgrades be prioritised with funding from developers before further large developments are consented.	Infrastructure design is outlined in the Infrastructure Report and Stormwater Management Strategy attached to the Application as appendices 9 and 11 respectively. Further assessment and changes to conditions of consent has occurred post-lodgement with the Applicant confident that the application appropriately manages infrastructure effects associated with the development, noting that further refinement of proposed consent conditions will occur prior to the decision.
Environment We are in receipt of the draft response from Friends of Taupō Swamp & catchment. We fully support the comments made therein.	See response to comments made by Friends of Taupō Swamp & catchment above.
Consenting We note that a 15 year consenting lapse date has been requested by the applicant. We believe that a 5 year consenting period is more appropriate. This allows for structured and progressive evaluation of the efficacy of consent conditions and the ability to adapt to changing environmental, economic and demographic factors, as well as any significant events such as a major earthquake or a weather event. We further note the potential amalgamation of councils including two consenting authorities, PCC and GWRC. We trust that responsibility for monitoring of consent conditions will be clearly spelled out and contingency in the event of amalgamation is allowed for.	These matters are addressed in a Planning Memorandum attached as Appendix B.

Table 10: Tiaki Wai - Other invited parties - FTAA section 53(3)

Matters raised	Applicant response
[Topic]	
Issue F1: Stormwater Management - Water Sensitive Design No clear options assessment; the dismissal of rainwater harvesting as “ineffective for a single catchment” is not supported by analysis. Provide an options assessment testing alternative treatment configurations, rainwater harvesting at different scales, infiltration and catchment-scale trade offs; tie the design to enforceable impervious-area assumptions.	The Applicant disagrees that an adequate options assessment has not been undertaken. The Engineering Memorandum attached as Appendix C confirms that a range of alternative stormwater approaches, including infiltration devices, permeable paving, rainwater harvesting and alternative treatment configurations, were considered but were found to be impracticable due to the site's steep topography, low permeability soils, shallow groundwater and geotechnical constraints. An expanded optioneering assessment has been provided, and the Applicant maintains that the proposed treatment train represents the best practicable option for the site.
Issue F2: Stormwater Management- Treatment and Rain Gardens Raingardens undersized at ~1.3% instead of required 2% of contributing impervious area. Design calculations are not supported by any national treatment guidance. All raingardens for treatment to be sized in accordance with Wellington Water’s Water Sensitive Design for Stormwater: Treatment Device Design Guideline. Treatment to be provided in accordance with Wellington Water’s Water Sensitive Design for Stormwater: Treatment Device Design Guideline TW considers that stormwater treatment can be achieved via raingardens designed in accordance with Wellington Water’s Water Sensitive Design for Stormwater: Treatment Device Design Guideline. Significant redesigns are required, so the required Stormwater Management Plan will need to be updated and approved by Tiaki Wai and ideally developed with combined workshops with PCC, Ngāti Toa and Tiaki Wai prior to granting consent. Once acceptable concept designs have been developed, they will still require a detailed design consent condition requiring timing to state prior to lodgement of the plan for Engineering approval.	The Applicant disagrees that the raingardens are undersized or require significant redesign. The Engineering Memorandum concludes that the 2% sizing criterion applies to untreated impervious areas contributing directly to each treatment device and that, when assessed using the appropriate methodology, the proposed devices comply with the relevant guidance. Additional design verification has been provided confirming that the proposed raingardens can achieve the stormwater quality outcomes assumed in the assessment.
Issue F3: Stormwater Management- Retention and Extended Detention (Hydrological Control)	The Applicant disagrees that the proposal lacks meaningful hydrological control.

Not retention provided - wetlands are described as providing retention, but this is mislabelling. The proposal relies solely on extended detention; there is no genuine retention through reuse or infiltration. Applicant's modelling shows a 40% increase in post development daily discharge and a significant increase in total runoff volume Sitewide Hydrological Control in accordance with Greater Wellington Hydrological Control Guidance Note to be achieved via On-lot retention via rainwater harvesting tanks plumbed for internal non-potable use and lined raingardens with internal water storage (unlined raingardens where practical). Remaining Hydrological Control depth to be achieved via centralised extended detention devices (raingardens sized to provide extended detention, oversized pipes or basin sized for extended detention). An accepted PC1 Schedule 29 Stormwater Impact Assessment (updated item 7) — informed by engagement with PCC Parks, Roding, Ngāti Toa and Tiaki Wai — should form the basis of a revised Stormwater Management Plan demonstrating the sitewide hydrological control set out under Required Outcome. As this may alter raingarden sizing, scheme layout and earthworks, it cannot be secured through Engineering Approval alone.	The Engineering Memorandum concludes that, while infiltration-based retention is not feasible due to site geology and geotechnical constraints, the proposed wetland system provides permanent storage, extended detention and attenuation that replicates key elements of the existing hydrological regime. The hydrological controls have been modelled and integrated into the overall stormwater management strategy (refer to the Hydrology Memorandum attached as Appendix F).
Issue F4: Stormwater Management- Transport Methodology Sediment transport analysis is inadequate - based on insufficient data, ignores fine particle mobilisation, introduces runoff from adjacent undeveloped catchment and generic channel assumption Either substantiate (flow events, reaches, sensitivity, validation against Taupo/Kakaho) or adopt a conservative best-practicable-option hydrological control approach	The Applicant disagrees that sediment transport effects have been inadequately assessed. The Engineering Memorandum concludes that the proposed treatment train, attenuation measures, and erosion and sediment controls will appropriately manage stormwater and sediment effects, with the proposal designed to minimise sediment discharge to downstream receiving environments including Taupō Stream, Kakaho Stream and Te Awarua-o-Porirua Harbour.
Issue F5: Stormwater Management- Cumulative effects Not considered. No cumulative assessment with Muri Road, NGA or Plimmerton Farm Stage 1 Consideration of increased runoff volumes from upstream developed catchments for inline stormwater management solutions.	The Applicant disagrees that a wider cumulative stormwater assessment is necessary to determine this application. The Engineering Memorandum concludes that the proposal incorporates treatment and attenuation measures that appropriately manage effects

Provide runoff-volume assessments for Mt Welcome alone, with Muri Road block, and combined with Plimmerton Farm Stage 1	generated by Mt Welcome, and that assessment of hypothetical future development scenarios would require assumptions regarding projects that are not yet designed, consented or constructed.
Issue F6: Stormwater Management- schedule 29 SIA No accepted Schedule 29 SIA; the SMP does not appear to have been developed from one. An accepted GWRC NRP Schedule 29 SIA must form the basis of the revised SMP, developed with PCC, GWRC, Te Runanga o Toa Rangatira and Tiaki Wai.	The Applicant disagrees that a separate Schedule 29 Stormwater Impact Assessment is required. The Engineering Memorandum notes that Section 11 of the Stormwater Management Plan already addresses the relevant Schedule 29 matters, including receiving environments, treatment systems, hydrological controls, environmental effects, maintenance considerations and cultural matters. The Applicant therefore considers sufficient information has been provided to assess stormwater effects.
Issue F7: Stormwater Management- Flood Modelling Flood Model provided for the site demonstrating neutrality for peak flow in the immediate vicinity of the site. The flood modelling does not consider the effects of the increase in stormwater volume, in particular downstream of the Taupo Swamp. In addition, the Tiaki Wai Flood modelling team have identified a number of technical concerns regarding the modelling. Additionally, a number of the catchment boundaries appear incorrect, and a number of the discharges are not discussed. And finally, sedimentation of the wetlands does not appear to be accounted for in the modelling. Updated flood modelling to address the comments raised and extended to include the Taupo Swamp and associated discharges. Conditions requiring an updated and extended flood modelling prior to the commencement of any works / earthworks on site.	The Applicant disagrees that additional catchment-wide flood modelling is necessary. The Engineering Memorandum concludes that post-development peak flows are attenuated to pre-development levels and that the flood modelling demonstrates hydraulic neutrality and appropriate management of development-generated flood effects. Clarifications and updates have been incorporated into the flood model documentation, but the Applicant maintains that the information before the Panel is sufficient to assess flood effects.
Issue F8: Stormwater Management- Flood Hazard Cumulative Effects Not Assessed. The flood modelling only considers the site and does not address the cumulative effects. Without this information TW cannot be satisfied that the proposal appropriately addresses the cumulative effects on the receiving catchment Updated flood modelling to include assessments of the Mt Welcome, Mt Welcome + Muri Block, Plimmerton Farms and fully developed NGA	The Applicant agrees that refinements to maintenance access, documentation and staging arrangements are beneficial and has amended the proposal accordingly, including increasing maintenance access widths and refining wetland design details. However, the Applicant disagrees that the retention wetland strategy requires fundamental redesign, concluding that the wetlands provide an

Conditions requiring an updated and extended flood modelling prior to the commencement of any works / earthworks on site.	effective and integrated solution for stormwater attenuation, hydrological control and environmental enhancement.
Issue F9: Retention Wetlands – Stormwater Options Assessment 5 retention wetlands have been proposed within the catchment gullies and in a purposely created stormwater management area for stormwater detention and ecological mitigation. The retention wetland does not serve a treatment function. It is not clear that a detailed options assessment or SID assessment has been provided that supports the design proposed. In the absence of a detailed options assessment, it is unclear to TW that the option presented which co-located ecological mitigation and stormwater management and is reliant on earthworks bunds presents the best practical long-term solution. Detailed optioneering report to support the design strategy. Conditions which require a detailed stormwater optioneering report,	The Applicant disagrees that the proposed outfall strategy is inappropriate. The Engineering Memorandum concludes that the proposed outfalls discharge to existing gullies and drainage pathways, include erosion protection measures, and can be appropriately maintained through the proposed easement and access arrangements. Additional location-specific information has been provided, but no changes to the overall discharge strategy are considered necessary.
Issue F10: Retention Wetland- Co-location of Ecological Mitigation and Retention Wetlands The applicant proposes to colocate ecological mitigation and stormwater management with a conservation covenant over these areas. GWRC have advised TW that, if accepted, the ecological mitigation will be subject to adaptive conditions. Tiaki Wai's role is to manage public stormwater infrastructure but not ecological systems and as such the proposed strategy is not supported by Tiaki Wai. Appropriate long-term ownership of the stormwater assets. Stormwater management structure that supports long term operation and maintenance	The Applicant disagrees that the wastewater assessment is insufficient. The Engineering Memorandum concludes that the modelling is based on the network owner's calibrated model and incorporates known network constraints and adjacent development information where available. The Applicant supports a staged and adaptive approach, with future reassessment occurring at appropriate development thresholds, rather than requiring modelling of uncertain future growth scenarios.
Issue F11: Retention Wetland Maintenance Requirements The applicant confirmed during meeting 16 June 2026 that the areas would not require desilting and 3 m access is only provided to the embankments It is not clear that the flood modelling / sizing allows for sedimentation within the retention wetlands and based on advice from GWRC Tiaki Wai consider that appropriate access should be provided to these areas. Appropriate access to ensure maintenance required to meet long term environmental outcomes are achieved.	The Applicant agrees that maintenance access arrangements should be refined and has amended the proposal accordingly. The Engineering Memorandum confirms that maintenance access to raingardens and wetlands has been increased from 3 m to 4 m, and that wetland bases have been refined to improve long-term operation and maintenance. The Applicant maintains that the revised access arrangements

Updated stormwater management plan that addresses safe operation and maintenance of the stormwater management devices.	provide an appropriate balance between maintenance requirements and minimising unnecessary earthworks and environmental disturbance.
Issue 12: Retention Wetlands- Pre-Treatment None provided. TW consider that SW management to achieve the required stormwater outcomes will require pre-treatment. Updated Stormwater Management Strategy to include best practice pre-treatment upstream of all stormwater management devices / areas with appropriate access. Conditions which require an updated stormwater management strategy which incorporates pre-treatment	The Applicant disagrees that gross pollutant traps or sediment forebays are required upstream of every wetland. The Engineering Memorandum notes that stormwater runoff is already treated through catchpits, inlet structures and raingardens prior to entering the wetlands, with raingardens removing a substantial proportion of suspended solids. The Applicant therefore considers that additional pre-treatment devices are unnecessary and would not result in materially improved environmental outcomes.
Issue F13: Rain Garden 01 and Retention Wetland B The proposal places Rain Garden 01 within the 1% AEP + CC Flood Extent for Wetland B. Tiaki Wai consider that this will increase the long term operation and maintenance costs associated with the rain garden and do not consider that this is an acceptable outcome for a greenfield development. Stormwater management devices that can be vested with Tiaki Wai, with appropriate whole life costs. An updated design which locates Rain Garden 01 clear of the 1% AEP flood hazard.	The Applicant disagrees that Rain Garden 01 should be relocated. The Engineering Memorandum confirms that the current arrangement is driven by stormwater network design requirements and that relocation would create less efficient hydraulic outcomes and increased maintenance complexity. The Applicant therefore considers the existing design remains the most practical and effective engineering solution.
Issue F14: Retention Wetland D The proposal places retention wetland D above the future Muri Block Residential Development. Tiaki Wai do not consider that retention wetland D can be considered a 'natural' wetland in that it does not receive any 'natural flows'. The wetland is not needed for treatment purposes and the creation of a wet storage area uphill of the future Muri Road residential lots is not supported by Tiaki Wai. Stormwater management devices that can be vested with Tiaki Wai, with appropriate whole life costs. An updated design which changes 'retention wetland' D from a ponded water body to a dry detention basin.	The Applicant disagrees that Wetland D should be converted to a dry detention basin. The Engineering Memorandum confirms that the permanent water level is a deliberate component of the stormwater management strategy, providing retention and attenuation functions that assist in replicating existing hydrological conditions. The Applicant therefore maintains that Wetland D should remain as proposed.

Issue F15: Retention Wetland- Staging Flood Modelling is presented for the fully developed site. There are discrepancies between the earthworks staging, development staging and wetland delivery. It is not clear therefore that neutrality will be achieved as each stage progresses. Stormwater neutrality at every stage of the development. Conditions requiring detailed earthworks plans, updated ECMP, and co-ordinated staging plan be provided to demonstrate neutrality as each stage comes forward.	The Applicant agrees that stormwater infrastructure must be delivered in a manner that maintains hydraulic neutrality as development progresses. The Engineering Memorandum confirms that wetlands will be constructed and operational when required by development staging and relevant consent conditions, with infrastructure triggers based on cumulative allotment numbers rather than fixed stage sequencing. The Applicant considers that this provides a robust and flexible approach to managing stormwater effects throughout development.
Issue F16: Stormwater Reticulation- Outlets The application relies on discharges via overland flows below the housing development. TW and PCC have concerns regarding the long term stability of the stormwater outfalls and consider that the design requires amending to remove the concentrated stormwater discharges from the development boundary, remove the stormwater outfall uphill of the Muri Road Block residential lots, extend all outlets to the bottom of the gully or ephemeral watercourse with appropriate access for ongoing operation and maintenance. Appropriate management of stormwater to ensure the long term stability of the site. An updated design which addresses the items raised by Tiaki Wai.	The Applicant disagrees that the proposed outfall strategy is inappropriate. The Engineering Memorandum concludes that all outfalls discharge to existing gullies and natural flow paths, include erosion protection measures, and are designed to maintain existing drainage patterns while managing stormwater effects. Additional outlet-specific information has been provided, however the Applicant does not consider that relocation or fundamental redesign of the outfall network is required.
Issue F17: Stormwater Reticulation- Scheme Staging The applicant proposes to undertake an initial subdivision of the site to create super lots 5000, 5001, 5002 and 5003, with Lots 5000, 5001 and 5002 subject of further subdivision, whilst Lot 5003 will be a balance farm lot of 105.5476 ha. The stormwater proposal requires stormwater mains and outfalls within Lot 5003, which if delivered after the creation of Lot 5003 will require negotiation with the owner of Lot 5003 to secure stormwater outfalls / accesses / easements etc Securing appropriate stormwater outfalls / accesses / easements as the staging progresses. An updated scheme plan / staging proposal that retains the outfalls / accesses / easements within the 'subdivision' to secure the stormwater reticulation.	The Applicant agrees that easement and access arrangements be refined. In response to comments received, the scheme plan has been amended to include drainage easements, overland flow path easements and easements in gross to ensure long-term access and operation of stormwater infrastructure. The Applicant considers that these changes adequately address the servicing and staging matters raised.

Issue F18: Wastewater- Modelling The applicant has provided Wastewater modelling which they state supports: No constraints on the Mt Welcome development, an updated review at Stage 10 (infrastructure report 10.3.4) - condition 80. Tiaki Wai does not consider that the wastewater modelling can be relied upon to demonstrate no overflows, or the proposed wastewater mitigation. Updated wastewater modelling to demonstrate the impact of the development on the Porirua Harbour, Taupo Swamp and Stream, with an updated wastewater strategy and concept to demonstrate that any wastewater mitigation required can be achieved. Conditions requiring an updated wastewater strategy ahead of any works commencing on site.	The Applicant disagrees that the wastewater modelling is unreliable or insufficient for determination of the application. The Engineering Memorandum notes that the assessment relies on the network operator's calibrated model and incorporates known network constraints and operational parameters. The Applicant considers that the modelling demonstrates a feasible servicing pathway and that future infrastructure requirements can be managed through staged development triggers and progressive reassessment.
Issue F19: Wastewater- Cumulative Effects The wastewater modelling does not include the wider NGA developments. The applicant should quantify the cumulative wastewater effects of Mt Welcome with the adjacent Muri Road Block, Plimmerton Farm Stage 1 and the wider NGA. Updated wastewater modelling inclusive of the wider NGA developments. Conditions requiring an updated wastewater strategy ahead of any works commencing on site.	The Applicant disagrees that additional modelling of hypothetical future development scenarios is required. The Engineering Memorandum confirms that adjacent development information has been incorporated where available and that modelling of uncertain future growth areas would require assumptions regarding land use, infrastructure solutions and staging that are not yet known. The Applicant considers that the current assessment appropriately addresses the effects of the Mt Welcome development.
Issue F20: Water Reticulation- Gray Street Connection A water supply connection will be laid from Gray Street to service the development. The connection is required to service and provide resiliency to Stages 1 to 5A. Installation of the main to achieve clearance to the public wastewater main, State Highway and no impact on the SNA. The alignment proposed does not take into consideration the presence of the public wastewater main within the highway berm and the required clearances between the wastewater main and SNA. Installation of the main to achieve clearance to the public wastewater main, State Highway and no impact on the SNA. Further information is required before consent is granted to demonstrate that the water connection can be secured within the State Highway corridor, giving	The Applicant disagrees that further information is required before consent can be granted. The Engineering Memorandum confirms that the Gray Street water connection has been demonstrated within the relevant corridor while maintaining clearance requirements and avoiding effects on adjacent Significant Natural Areas. The Applicant considers that the proposal demonstrates a feasible and appropriate water supply connection.

consideration to the existing public wastewater main clearances and the SNA. This cannot be deferred entirely to Engineering Approval.	
Issue 1: Stormwater- Raingarden Maintenance Access The application provides a 3 m access at a max gradient of 1V:6H. Tiaki Wai considers that 3 m is insufficient and that in addition to width the access should confirm safe operating conditions not working near steep fill or cut slopes. Stormwater assets that can be vested to Tiaki Wai with appropriate access for long term operation and maintenance. Needs updated Design.	The Applicant agrees that maintenance access should be refined and has amended the proposal accordingly. Maintenance access widths have been increased from 3 m to 4 m where appropriate, with updated plans reflecting these changes. The Applicant maintains that the revised layout provides suitable long-term access while avoiding unnecessary environmental disturbance.
Issue 2: Joint Access Lot Classification The application has stated that the drainage within the access lots may be private or public. Concept drawings treat JOAL (private) drainage as part of the public network; Tiaki Wai may not accept operational responsibility for private drainage. Clear delineation of the boundary between public and private stormwater infrastructure. Appropriate servicing arrangements for private infrastructure prior to granting Engineering Approval	The Applicant agrees that ownership and operational responsibilities for stormwater infrastructure should be clearly identified. Updated plans and vesting arrangements clarify the distinction between public and private infrastructure and provide for the vesting of relevant three waters assets in Tiaki Wai where appropriate. The Applicant considers these amendments adequately address the concerns raised.
Issue 3: Stormwater Management- Imperviousness Assumptions No landscaping plans TW considers that a single enforceable impervious-area assumption must underpin all elements of the stormwater management design. Controls on imperviousness areas. Consent Notice on individual lots to secure the impervious - area requirements.	The Applicant disagrees that additional consent notices or impervious surface controls are required at this stage. The Engineering Memorandum concludes that the stormwater management system has been designed using appropriate imperviousness assumptions, and that compliance with stormwater performance objectives can be achieved through the proposed design and engineering approval framework.
Issue 4: Stormwater Management- Zinc and Copper Building Materials Proposes GWRC consent condition. No restrictions on exposed zinc or copper building materials proposed. Also this matter is not addressed in PCC District Plan. Consent notice on titles - standard condition. Condition exists in GWRC - check applicants condition set. Consent notice condition imposing PC1 requirement.	The Applicant agrees and notes this condition is proposed.

Issue 5: Stormwater Management- Cultural Matters and Monitoring Acknowledged. Ngāti Toa concerns are acknowledged but not addressed. No mātauranga Māori or mauri-ora monitoring framework proposed. Mātauranga Māori values incorporated within the design. Revised stormwater management approach with mana whenua input.	The Applicant acknowledges the cultural significance of Te Awarua-o-Porirua catchment. The Applicant has worked closely with Te Rūnanga o Toa Rangatira throughout this process. See Table 3 above for a summary of their comments on the proposal, and the Applicant's response. The Applicant considers that the proposed stormwater management approach, together with wetland restoration, ecological enhancement and monitoring measures, will contribute to improved environmental outcomes while appropriately managing stormwater and freshwater effects.
Issue 6: Stormwater Management- Flood Management during Staging Delivery of the retention wetlands as development progresses. There appears to be discrepancy between the earthworks staging plans, staging plans and ECMP. It is not clear therefore that neutrality is achieved at all stages. Stormwater neutrality for each stage of the development as it comes forward. Conditions which require detailed and co-ordinated earthworks plans, ECMP and scheme plan.	The Applicant agrees that stormwater management infrastructure must be aligned with development staging. The Engineering Memorandum confirms that infrastructure triggers and staging requirements have been incorporated to ensure hydraulic neutrality is maintained as development progresses, with detailed implementation addressed through certified management plans and engineering approvals.
Issue 7: Stormwater Reticulation A stormwater network will be extended to service the development. The proposed layout appears to be generally consistent with the requirements of the RSWS but will need to be delivered through an Engineering Approval process. Servicing of each lot stormwater by installation of public network compliant with the requirements of the RSWS. Conditions which require Engineering Approval, these should meet Tiaki Wai's Asset Owner Requirements for stormwater management assets.	The Applicant agrees that detailed design certification is appropriate. The Engineering Memorandum confirms that the proposed stormwater network is generally consistent with servicing requirements and that final design, vesting and asset owner requirements can be addressed through the engineering approval process.
Issue 8: Wastewater- Gravity vs Pumped Systems The layout requires 6 public pumping stations and 63 lots serviced by local pressure sewer systems. The application does not appear to include wastewater modelling or optioneering report that supports the strategy proposed constraints / opportunities to maximise gravity and minimise pumping.	The Applicant disagrees that a different wastewater servicing approach is required. The Engineering Memorandum concludes that the proposed wastewater strategy has been informed by network modelling and physical constraints, and provides a feasible servicing solution that can be managed through detailed design, consent notices and engineering approval processes.

Development supported by a wastewater servicing assessment supported by modelling minimising lots that cannot achieve a gravity solution.⁵ Outcome achieved through conditions which require a wastewater servicing strategy supported by modelling for the full development at the time of Engineering Approval and prior to earthworks on any stage, along with consent notices requiring on lot wastewater pumping.	
Issue 9: Wastewater Network- Reticulation Wastewater design. The design requires confirmation through the Engineering Approval process. Servicing of each lot with a compliant wastewater connection. Conditions which require Engineering Approval, these should meet Tiaki Wai's Asset Owner Requirements for public pumping stations.	The Applicant agrees that detailed wastewater reticulation design should be confirmed through the engineering approval process. The Applicant considers that sufficient information has been provided to demonstrate servicing feasibility and that detailed design matters are appropriately addressed through subsequent approval processes.
Issue 10: Wastewater- Development Constraints Consent notices proposed for lots with on lot pumping. Consent notices to secure the design limitations - one dwelling per lot, and require on lot mitigation (wastewater pumping) where required. Delivery of development and housing (post s224) that reflects the wastewater design limitations. Consent notice limiting development to 1 dwelling per lot (as proposed by the developer). Consent notices requiring the installation and management of on lot wastewater pump stations on lots as required subject to the outcome of the wastewater strategy.	The Applicant agrees that development should proceed in a manner consistent with wastewater servicing constraints. The Engineering Memorandum supports the use of consent notices and staging controls where required to ensure that future development aligns with available wastewater infrastructure capacity.
Issue 11: Sustainable Water Use No measures appear to be proposed. Tiaki Wai has not been able to identify how the application incorporates water conservation measures to preserve water resources and their mauri. Given the clear guidance in the WIP and Plan Change 1 and previous work in the catchment TW consider that best practice water conservation measures (on lot rainwater harvesting) should be conditioned. Outcome can be achieved through conditions requiring on lot rainwater harvesting design principles demonstrated through Engineering Approval and water metering, in conjunction with consent notices requiring rainwater harvesting to be provided	The Applicant disagrees that mandatory rainwater harvesting is necessary to achieve sustainable water use outcomes. The Engineering Memorandum concludes that the development can be appropriately serviced through the public reticulated water supply system and that water conservation can be achieved through a range of mechanisms without requiring rainwater tanks on every allotment. Refer also to the Hydrological Memorandum in Appendix F.

on all new residential / commercial lots in accordance with the principles of the concept design approved under the Fast Track Consent.	
Issue 12: Non-Compliant Water Pressures 29 lots with a modelled pressure of 24m, just below the RSWS 25m requirement and 3 lots where the pressures are slightly above the RSWS maximum. Consent Level Matter. The application does not appear to include water modelling that demonstrates the design or a water services strategy that identifies constraints / opportunities to minimise non-compliant pressures. Development supported by a water servicing assessment supported by modelling minimising lots that cannot achieve compliant pressures. Outcome achieved through conditions which require a water servicing strategy supported by modelling for the full development at the time of Engineering Approval and prior to earthworks on any stage, along with consent notices requiring on lot mitigation on land titles where compliant pressures cannot be met.	The Applicant disagrees that the identified pressure variations represent a significant servicing constraint. The Engineering Memorandum concludes that these are minor and localised matters associated with site topography and reservoir location, and can be appropriately addressed through detailed design and final modelling.
Issue 13: Water Supply- Network Resiliency A 2nd resiliency connection is required for every 50 lots. In the short term (before the NGA 3.7 ML reservoir and associated reticulation is implemented) the applicant proposes to provide resiliency via a secondary connection via the new bulk water main. The application correctly identifies the network resiliency requirements and the initial proposed secondary connection is acceptable to Tiaki Wai. Network resiliency to be achieved prior to delivery of the 51st lot and every 50 lots thereafter. Conditions which require a secondary water supply connection to be installed and commissioned prior to delivery of the 51st lot and every 50 lots thereafter.	The Applicant agrees that network resiliency requirements should be met as development progresses. The Engineering Memorandum confirms that secondary supply connections and associated infrastructure can be staged in line with development and secured through proposed conditions and engineering approvals.
Issue 14: Water Supply- Pukerua Bay Connection Restrictions The applicant proposes 237 houses (Stage 1 - 4B) to be fed from the Pukerua Bay Reservoir. The Pukerua Bay reservoir only has capacity for an additional 200 lots. Installation and commissioning of the new 3.7ML reservoir prior to delivery of the 201st Lot. Conditions which limit connection to the Pukerua Bay reservoir to 200 and require installation and commissioning of the 3.7 ML reservoir prior to delivery of the 201st Lot.	The Applicant agrees that development staging should reflect existing network capacity constraints. The Engineering Memorandum confirms that the proposed staging framework has been updated to reflect the accepted 200-lot threshold and associated infrastructure requirements.

Issue 15: Water Supply- GWRC Off Site Bulk Water Main Restrictions Not Addressed. The ZMP confirms the existing GWRC Off site Bulk Water Main (managed by Tiaki Wai) does not have sufficient capacity to service the full Northern Growth Area build out. Whilst upgrades are planned to be delivered (by Tiaki Wai) the timing of these must be managed. Tiaki Wai advises that connections brought forward ahead of the BWM upgrades will not be accepted. Management of the rate at which connections come forward to ensure water is available when required. Development programme to be provided to Tiaki Wai to be used to manage the water upgrades. Conditions which require the consent holder to provide a 5-year development programme prior to commencement of the 201st lot and every subsequent block of 200 thereafter, with the development programme identifying the anticipated rate and timing of the development water supply connections.	The Applicant agrees that development timing should be coordinated with wider water supply infrastructure upgrades. The Engineering Memorandum concludes that these matters can be managed through development staging, infrastructure triggers and coordination with the network operator.
Issue 16: Water Reticulation A water network will be extended to service the development. Tiaki Wai note that portions of the key water infrastructure are being delivered by the Muri Block Developer. This represents a risk that must be managed by the developer. Servicing of each lot for domestic and firefighting water by installation of public water network compliant with the requirements of the RSWS. Conditions which require Engineering Approval, these should meet Tiaki Wai's Asset Owner Requirements for the Bulk Mains and Booster Pump Station and advice notes that delivery will require co-ordination with the Muri Block.	The Applicant agrees that detailed water reticulation design and coordination with third parties will be required. The Engineering Memorandum concludes that feasible servicing arrangements have been identified and that final implementation can appropriately occur through engineering approval processes.
Issue 17: Water Supply- Design Limitations The NGA 3.7 ML is based on a total development of 1500 dwellings @ 3.5 people / dwelling @ 700 L/day. To ensure appropriate water allocation across all new development all development is limited to one dwelling per lot. Delivery of development and housing (post s224) that reflects the water supply design limitations. Consent notice limiting development to 1 dwelling per lot (as proposed by the developer).	The Applicant agrees that development should occur within the parameters of available servicing infrastructure. The Engineering Memorandum supports development controls and consent notice mechanisms where required to ensure future development remains consistent with network capacity assumptions.

Issue 18: Easements and Land The application proposes to create all-purpose drainage reserves. Tiaki Wai advise that it is not likely TW will accept ownership of land parcels other than those required to be secured for operational purposes - reservoirs / pump stations. In addition, EIG are required to be secured over all assets and over any overland flow path - in particular below outlets. Scheme Plan will require amending to remove the All-Purpose Drainage Reserves currently shown. Updated scheme plan that reflects all easements and appropriate ownership of land parcels.	The Applicant agrees that ownership, access and easement arrangements should reflect the operational requirements of Tiaki Wai. Updated scheme plans now provide for revised vesting arrangements, drainage lots, easements in gross and overland flow path easements. The Applicant considers these amendments adequately address the concerns raised and do not affect the functionality or deliverability of the proposed infrastructure network.
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Applicant Response to Section 51 Comments

Table 1: Heritage New Zealand Pouhere Taonga - section 51(2)(d)

Matters raised	Applicant response
HNZPT seeks several changes to the Draft Archaeological Management Plan (AMP)	These matters are addressed in an updated Archaeological Management Plan attached as Appendix K.

Table 2: Department of Conservation - section 51(2)(e)

Matters raised	Applicant response
1. All instream structures (culverts, dams, retention wetlands) must be designed, constructed, operated, monitored, and maintained to provide for effective fish passage, in accordance with the New Zealand Fish Passage Guidelines.	The Applicant has incorporated fish passage requirements where fish passage is ecologically appropriate and practicable. The Ecology Memorandum attached as Appendix D supports fish passage provision through the Taupō Stream culvert and relevant retention wetlands B and E, and concludes that the proposed freshwater management framework, together with monitoring and management plan requirements, will appropriately manage effects on aquatic connectivity.
2. A Fish Passage Plan must be submitted to the Director-General of Conservation for certification before construction begins. This plan must demonstrate how fish passage will be maintained or provided at all relevant structures, including during low-flow conditions, and how aquatic habitat connectivity will be retained.	The Applicant disagrees that a Fish Passage Plan for certification by the Director-General of Conservation is necessary or appropriate. The Planning Memorandum in Appendix B concludes that fish passage and freshwater management matters are already addressed through the resource consent framework, conditions and management plans, and that an additional DOC certification process would duplicate the role of the consent authorities and impose requirements beyond what is necessary to manage effects. The Applicant nevertheless supports appropriate fish passage design and management measures being incorporated into the relevant management plans and consent conditions.
3. The Fish Passage Plan must include procedures for ongoing monitoring of all installed culverts and structures to ensure fish passage is maintained for target freshwater fish species and life stages. If monitoring shows fish passage is not maintained, remedial actions must be implemented as soon as practicable.	While the Applicant disagrees that a Fish Passage Plan for certification by the Director-General of Conservation is necessary or appropriate, the Applicant agrees that monitoring is appropriate to confirm the ongoing performance of fish passage measures. The Ecology Memorandum supports monitoring and adaptive management provisions within the freshwater management framework; however, the Applicant considers that the scope and frequency of monitoring should remain proportionate

	to the ecological values present and be administered through the consent process rather than a separate DOC-certified approval pathway.
4. The Fish Passage Plan must include robust biosecurity controls to prevent the spread of freshwater pest species. All staff and contractors must follow the Ministry for Primary Industries' Check Clean Dry method (including gold clam-specific requirements) for all equipment and gear used in freshwater.	While the Applicant disagrees that a Fish Passage Plan for certification by the Director-General of Conservation is necessary or appropriate, the Applicant agrees that appropriate biosecurity controls should be implemented during freshwater works. The Ecology Memorandum supports standard biosecurity protocols as part of construction and freshwater management planning, and the Applicant is comfortable including practical measures to minimise the risk of introducing or spreading freshwater pest species where freshwater works are undertaken.
5. Comprehensive fish surveys must be conducted to confirm the presence or absence of fish before any dispensation from fish passage requirements is granted	The Applicant disagrees that additional fish surveys are necessary prior to determination of the application. The Ecology Memorandum concludes that sufficient survey information already exists to identify the species likely to be present and to inform appropriate fish passage design and management measures. The Applicant therefore considers that further surveys would be unlikely to materially change the assessment of effects or the proposed mitigation approach.