

By Fast-track Portal

13 August 2026

GW File No: PRE260041
EPA File No: FTAA-2605-1243

Minister for Infrastructure
C/O [Stephanie McNicholl]
Fast-track Applications
Environmental Protection Authority
Private Bag 63002
Wellington 6140

100 Cuba Street
Te Aro, Wellington 6011
PO Box 11646
Manners Street
Wellington 6142
T 04 384 5708
F 04 385 6960

Tēnā Koe

Comments on a referral application under section 17 of the Fast-track Approvals Act 2024: Cannon Point Development

Thank you for your letter dated 24 July 2026 inviting the Wellington Regional Council (Greater Wellington) to provide comments on the referral application under section 17 of the Fast-track Approvals Act 2024 (FTAA) for the Cannon Point project (the application).

This letter sets out our comments on the application. Greater Wellington's comments are structured to address the matters that the Minister may consider when deciding on a referral application under section 22(2) of the Act (see Section 2 of this letter), and the matters that local authorities must comment on under section 17(3) of the Act (see Section 3 of this letter).

Before providing any comments on the proposal, Greater Wellington wishes to acknowledge mana whenua within the rohe where the project is located, including Te Rūnanga o Toa Rangatira Incorporated and the Port Nicholson Block Settlement Trust. We understand that mana whenua will have been invited by the Minister to comment on the referral application and consider that the Minister should have particular regard to any comments provided by them in relation to this application. We also consider that the Minister should have particular regard to any iwi planning documents prepared by them that may be relevant to the application.

1. Summary

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits. This purpose is reflected in the criteria for accepting a referral application under section 22 of the Act.

Greater Wellington considers that, based on the information contained in the application, the extent to which the project will result in significant regional benefits is uncertain when considered alongside the matters set out in section 22 of the FTAA. Greater Wellington notes the following key points:

- While the information contained in the application indicates that there may be economic and housing supply benefits as a result of the project, it is uncertain based on this information whether the benefits will be regionally or nationally significant;
- The project does not appear to deliver any other regionally or nationally significant benefits (such as regionally significant infrastructure, climate change mitigation or adaptation measures, or addressing significant environmental issues);
- Greater Wellington considers that, if the referral application is approved, any future substantive application must demonstrate that the construction and operation of the project will appropriately manage any adverse effects on the environment, including through adherence to the effects management hierarchy.

2. Comments on criteria for assessing a referral application (FTAA section 22(2))

This section sets out our comments on the application in relation to the matters that the Minister may consider when deciding on a referral application under section 22(2) of the FTAA.

Section 22(2)(a)(i): Whether the project has been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list

The project is not identified as a prioritised development in *Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054* (the regional Future Development Strategy).

Section 22(2)(a)(ii): Whether the project will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure

The project does not involve the delivery of regionally significant infrastructure (as defined in the Regional Policy Statement for the Wellington Region).

Section 22(2)(a)(iii): Whether the project will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020)

The proposal aims to deliver 162 dwellings in a low-density development.

Greater Wellington notes that the area where the development will be located has limited existing accessibility to amenities and services, by public and active transport. It is therefore unlikely that the development will contribute to a well-functioning urban environment, as defined by the NPS on Urban Development.

Section 22(2)(a)(iv): Whether the project will deliver significant economic benefits

The application includes an Economic Impact Assessment (EIA)¹ that estimates the total additional gross economic output into the Wellington regional economy that would be facilitated by the project. Greater Wellington has not undertaken an independent expert assessment of the EIA. The EIA estimates that:

- The total value added by the project to the Wellington regional economy will be \$126.6m over 5 years;
- The project would contribute around 744 full-time equivalent jobs during the 5-year development period².

While the EIA estimates that there will be benefits to the Wellington Region economy, the EIA has not taken into account the wider costs that may arise from the project (for example, costs associated with the potential impacts of the project on existing and future public infrastructure and services). As a result, it is uncertain whether the information contained in the application demonstrates that the overall economic benefits of the project will be regionally or nationally significant.

¹ Property Economics (June 2026). *Cannon Point Upper Hutt Fast-track Economic Impact Assessment*.

² Property Economics (June 2026), p.14

Section 22(2)(a)(v): Whether the project will support primary industries, including aquaculture

Not relevant to the project.

Section 22(2)(a)(vi): Whether the project will support development of natural resources, including minerals and petroleum

Not relevant to this project.

Section 22(2)(a)(vii): Whether the project will support climate change mitigation, including the reduction or removal of greenhouse gas emissions

Based on the information included in the application, the project does not appear to involve any quantified or discernible reduction or removal of greenhouse gas emissions.

Section 22(2)(a)(viii): Whether the project will support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards

The application identifies that the project will incorporate measures to address the risks to the project from natural hazards, with specific reference to flooding and liquefaction.

The applicant considers that the development of the East Block will not significantly increase the existing flooding hazard to Totara Park properties, nor will it result in any flooding risk to the proposed building platforms and associated dwellings. The applicant states that any potential flood effects can be mitigated through the construction of stormwater infrastructure. This potentially includes rain gardens or enhanced wetland areas. The project site is not within the 1% AEP flood hazard zone.

Beyond mitigating its own effects on natural hazard risk, it is uncertain whether the project would contribute to wider climate change adaptation, reduction of risks from natural hazards, or recovery from events caused by natural hazards.

Section 22(2)(a)(ix): Whether the project will address significant environmental issues

We are not aware of any significant environmental issues at the site that would be addressed by the project.

Section 22(2)(a)(ixa): Whether the project will promote competition in the grocery industry

Not relevant to this project.

Section 22(2)(a)(x): Whether the project is consistent with local or regional planning documents, including spatial strategies

The following regional statutory planning documents, prepared under the Resource Management Act 1991 (RMA) are relevant to the application:

- Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054³
- Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1 Appeals Version, September 2025)⁴
- Natural Resources Plan for the Wellington Region 2023⁵ including Proposed Change 1 to the Natural Resources Plan for the Wellington Region (Variation 1, December 2025)⁶

In addition to this, the following regional strategic planning documents are also relevant to the proposal:

- Wellington Regional Land Transport Plan 2021⁷
- Wellington Regional Public Transport Plan 2025-2035⁸

The following sections provide an analysis of whether the application is consistent with these documents.

Te Rautaki Whanaketanga ki tua a Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-2054

The site is on the boundary of the Upper Hutt urban area and is not in an area identified as a priority development area in the Future Development Strategy (FDS) for the region.⁹ The site is also not identified as a planned greenfield site in the FDS.¹⁰ For context, over its 30-year life, the FDS envisaged 82% of all housing development to occur in existing urban areas, with 18% of housing development occurring in greenfield sites.

Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1 Appeals Version, September 2025)

There are several objectives and policies in the Regional Policy Statement for the Wellington Region (Proposed Change 1 and Variation 1 Appeals Version, September 2025) (RPS) that are relevant to the proposal. Greater Wellington considers that any substantive application for the

³ See: <https://www.gw.govt.nz/assets/Documents/2025/08/1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf>

⁴ See: <https://www.gw.govt.nz/assets/Plans-policies-bylaws/RPS/RPS-Change-1-Appeals-Version-Sep-2025.pdf>

⁵ See: <https://www.gw.govt.nz/assets/Documents/2023/07/CORRECT-Natural-Resource-Plan-Operative-Version-2023-incl-maps-compressed.pdf>

⁶ See: <https://www.gw.govt.nz/assets/Plans-policies-bylaws/PNRP/PC1-home-page-content/NRP-PC1-Full-Plan-Change-Variation-1.pdf>

⁷ See: <https://www.gw.govt.nz/assets/Documents/2021/10/Wellington-Regional-Land-Transport-Plan-2021web.pdf>

⁸ See: <https://www.gw.govt.nz/assets/Documents/2025/06/Wellington-Regional-Public-Transport-Plan-2025-web.pdf>

⁹ 1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf, Diagram 9, p.36.

¹⁰ 1404-GWRC-WLRC-Future-Development-STRATEGY-2024-240223-06.pdf, pp. 40-41.

project must include a full assessment of the project against the relevant objectives and policies in the RPS. Greater Wellington notes that the following provisions of the RPS may be particularly relevant:

- Policy 40A (Loss of extent and values of natural inland wetlands): The proposed reclamation of natural inland wetlands is inconsistent with this policy. Policy 40A(c)(ii) requires that any loss of extent or values as a result of use and development in natural inland wetlands that is necessary for the purpose of urban development contributes to a well-functioning urban environment (as defined in the National Policy Statement on Urban Development 2020) and does not occur on land that is zoned in a district plan as general rural, rural production, or rural lifestyle.

The operative district plan zoning for the land on which the project is located is General Rural and Rural Lifestyle zone.

- Policy 55 (Managing greenfield development to contribute to a well-functioning urban areas and rural areas): As a low-density development outside the existing urban area, and with limited accessibility to existing amenities and services (including by public transport), Greater Wellington considers that the project is unlikely to meet all the policy criteria for new developments to contribute to well-functioning urban and rural areas.
- Policy 57 (Integrating land use and Transportation): The proposal appears to be about 600 – 800 m from the closest point of the development to the current bus route in Totara Park. Without further development of the bus route, this walking distance could result in car use and an increase in traffic in the area. Greater Wellington considers that the project would not currently meet the criteria for integrating land use and transportation options in alignment with policy 57.

Natural Resources Plan for the Wellington 2023 (including Plan Change 1 and Variation 1

The Natural Resources Plan for the Wellington Region 2023 (NRP) is the region's combined regional plan and regional coastal plan. Proposed Change 1 to the Natural Resources Plan for the Wellington Region (Variation 1, December 2025) (NRP-PC1) also applies to development at the site.

Based on the information contained in the application, the project is likely to require the following regional resource consents under the NRP or NRP-PC1:

Activity	Regional resource consents that may be required
Earthworks and the associated discharge of sediment and/or flocculant.	Land use consent and discharge permit under the NRP.
Vegetation clearance; land disturbance; earthworks; reclamation; taking, use, damming, or diversion of water; or discharge of water within or near a natural wetland/natural inland wetland	Land use consent, water permit, and discharge permit under the NRP. Regulations in the National Environmental Standards for Freshwater (NES-F) will also apply to the project.
Placement or construction of a river crossing structure, including: - Any associated disturbance of or deposition on the riverbed - Diversion of water - Discharge of sediment to water - Temporary damming of water - Reclamation	Land use consent, water permit, and discharge permit under the NRP. Regulations in the National Environmental Standards for Freshwater (NES-F) will apply to the project.
Discharge of stormwater into water, or onto land where it may enter a surface water body or coastal water	Discharge permit under the NRP.
Creation of impervious surfaces over 3000m ² , including the associated discharge of stormwater to water or to land where it may enter water	Land use consent and discharge permit under the NRP-PC1
Dewatering	Water permits and discharge permit under the NRP

Greater Wellington considers that any substantive application for the project must include a full assessment of the project against the relevant objectives and policies in the NRP and NRP-PC1. Greater Wellington notes that the following provisions of the NRP and NRP-PC1 may be particularly relevant to the proposal:

- The proposed partial loss of a natural wetland, for road realignment, would be contrary to the objectives of the NRP that seek that the extent and values of natural wetlands are maintained or increased, and their condition restored (Objective O22), unless the loss is appropriately minimised or offset (Policy P31).
- Objectives O12, O13 and policies P18, P20 and P21 recognise the cultural relationship

between Māori and air, land and water, recognise and provision for kaitiakitanga, and recognise the need to maintain the mauri of fresh and coastal waters.

- Objective 015 relates to managing hazard risk on people and the environment
- Objectives 017, 018 and 019 and Policies P9, P30 and P31 relate to maintaining and improving the quality of surface water bodies, including for recreation and Māori customary use, with the aim of improving overall aquatic ecosystem health.
- P83, P84, WH.P9, WH.P10 and WH.P15 relate to managing stormwater discharges through a range of methods, and reducing adverse effects of stormwater discharges from new impervious surfaces to the extent practicable.

Greater Wellington considers that, if the referral application is approved, any future substantive application must demonstrate that the construction and operation of the project will appropriately manage any adverse effects on the environment in accordance with the objectives and policies of the NRP and NRP-PC1, including through adherence to the effects management hierarchy.

Wellington Regional Land Transport Plan 2021

The proposal does not currently align with the objectives of the Wellington Regional Land Transport Plan – primarily objective 2, which requires that transport and land use, are integrated to support compact urban form, liveable places, and a strong regional economy.

Wellington Regional Public Transport Plan 2025-2035

Greater Wellington (through Metlink) is the public transport authority for the Wellington region. Metlink provided comments on the application, and these are located in appendix 1.

Section 22(2)(b): Other matters

The application includes a range of activities within or adjacent to natural inland wetlands under Regulation 45C (urban development) of the National Environmental Standards for Freshwater 2020 (NES-F). Greater Wellington notes that under Regulation 45C(7) of the NES-F, resource consent for these activities must not be granted, because the land is located in the General Rural and Rural Lifestyle zones in the operative Upper Hutt City Council District Plan 2004.

In addition to the criteria required under Section 22 of the FTAA, Greater Wellington has provided high level comments regarding potential impacts on the project from a public transport (Metlink) perspective at **Attachment 1**.

3. Mandatory comments for local authorities (FTAA section 17(3))

This section sets out the comments that Greater Wellington is required to provide as a local authority under section 17(3) of the FTAA.

Section 17(3)(a): any applications that have been lodged with the local authority that would be competing applications if a substantive application for the project were lodged

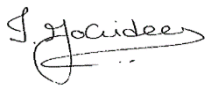
Greater Wellington has not identified any existing resource consent applications lodged with Greater Wellington that would be competing applications, if a substantive application for the project were lodged.

In relation to any proposed approval of the kind described in section 42(4)(a) (resource consent), any existing resource consents of the kind referred to in section 30(3)(a)

Greater Wellington has not identified any existing resource consents on or adjacent to the site of the kind referred to in section 30(3)(a) of the FTAA.

Please contact Simon Hunt at s 9(2)(a) should you have any questions about Greater Wellington's comments on the referral application.

Nāku noa, nā



Fathima Iftikar
Acting Group Manager Environment

Attachment 1: Wellington Regional Public Transport Plan 2025-2035

“Tōtara Park is currently served by Bus Route 111 (Upper Hutt-Totara Park-Upper Hutt), which connects the Tōtara Park area to central Upper Hutt. The closest bus stop to the East Block is Stop 8505, located on California Drive at Tacoma Drive.” Metlink considers that a walkable catchment for a bus route is a 5–10-minute walking distance (for an abled bodied person) around bus stops on a route.

It is unclear from the map provided on page 11 if the proposed developments are within this walkable catchment. If these new houses are not within walking distance of the bus stops, it is likely that residents will use their private vehicles to either drive to the train station in Upper Hutt or drive directly to their desired location (e.g. central Wellington for work). This will have an impact on congestion on State Highway 2 and the surrounding arterial roads.

We also note that the development is served by a single point of entry via the existing bridge on State Highway 2. Any substantial increase in vehicle traffic will put additional stress on this infrastructure noting it is a narrow passageway that already creates issues for larger vehicles.

We note that Upper Hutt park and ride has 349 car parks available, and this facility is 85% full between 6am to 7am most weekdays. We would need to investigate if this facility could be expanded to address additional demand, but this is not budgeted for in our current Long-Term Plan.

We also note that that route 111 is part of Tranche 2 of Greater Wellington Future Bus Services procurement strategy. The bus services in Lower and Upper Hutt will be reviewed to see if efficiencies can be found ahead of new bus contracts being tendered and awarded (with the new contract to start in 2029). There could be potential changes to route 111 and its frequency of services if Metlink believes these services can be delivered differently to provide better efficiency and outcomes for commuters.

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

Please do not use copyright material without the permission of the copyright holder.

All information held by MfE is subject to the Official Information Act 1982.

More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Cannon Point Development
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Upper Hutt City Council		
*First name	Kate		
*Last name	Thomson		
Postal address	Private Bay 907 Upper Hutt 5140		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Kate Thomson

Acting Chief Executive

Date: 11 August 2026

to sell. The ability to use this land is dependent on Council committee approval to sell the parcel, and then the applicant's success in purchasing the land.

Paper Road – west block – There is an area of paper road through this site, which would need to be closed to facilitate the development in this area. The request for closure of a paper road would be subject to a process either under the Local Government Act 1974 or the Public Works Act 1981. The ability to use this area of land will be reliant on the ability to successfully close the road.

3. *Whether you consider the project may involve an ineligible activity, and if so, why (as defined in section 5 of the Act)*

No, Council does not consider the project involves in ineligible activity in accordance with section 5 of the Act.

4. *Whether you consider any of the reasons to decline a referral application may be applicable to this application, and if so why (under section 21(5) of Act).*

No, Council does not consider there are reasons to decline a referral application.

Insert Fast-track logo

Project name	Cannon Point Development
Council Comments – prepared by	Bridget Herries Resource Consents and Compliance Manager Upper Hutt City Council

- 1. Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please provide written confirmation.**

The applicant has the two current resource consent applications (references below) that apply to the east block of land forming part of the subject site. Both applications are 'on hold' pursuant to s92 of the RMA (for further information requests).

RM2510117: Land use consent for earthworks – east block

RM2410147: Subdivision consent for residential lots – east block

- 2. The project area is located (in part) across land owned by the Upper Hutt City Council (UHCC) as well as being a relevant local authority for this application. With this context, are there any land ownership matters that UHCC consider may affect the delivery of the project?**

Council has identified the following land parcels owned by Upper Hutt City Council:

Lot 301 DP 588162 – this is a drainage reserve vested to Council as part of an earlier stage of development. This parcel of land is currently owned by Council, but ownership is in the process of being transferred to Tiaki Wai, noting the sole purpose of the land is for drainage. The drainage infrastructure has not yet been constructed on this parcel of land (which is the subject of an existing bond between the Council and developer). The intention of this land is for drainage infrastructure, and therefore Council raises no issues in regard to this parcel of land and the project.

Lot 2 DP 52931 – this parcel of land is reserve land (esplanade and river protection). Initial feedback is that the potential for a stormwater connection through this land from the development is acceptable. Consideration of whether there are any approvals required under the Reserves Act will need to be undertaken.

Lot 6 DP 46315 - this parcel of land is a free-hold parcel of land currently owned by UHCC. Council has not decided on whether this parcel of land is to be disposed of. This decision would be subject to Council committee approval, and it would be anticipated that the parcel of land would be listed on the general market for sale, if it was approved



Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing

07 AUG 2026

Hon. Chris Bishop
Minister for Infrastructure
infrastructure.portfolio@parliament.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

CORTP-8815

Tēnā koe Hon. Bishop

Thank you for your invitation to comment on the fast-track application for the Cannon Point project proposed for Upper Hutt.

Like most of the country, Upper Hutt continues to experience demand for additional housing supply and housing choice. While rental affordability in the city has increased in recent years, it has declined over the medium and long term – reflecting that demand for housing has outpaced supply. This proposal, comprising approximately 162 residential lots and two commercial lots across two greenfield blocks, would contribute to housing supply and support local commercial activity in the district.

As with any development of this scale, a range of matters may be raised by local authorities and infrastructure providers. These can be considered if the project proceeds to the detailed assessment stage. They may include infrastructure and servicing requirements, transport and accessibility matters, stormwater management, environmental effects, reserve provision, and other site-specific considerations.

These are important matters, but can be addressed through the fast-track process, including by the Expert Panel seeking comment from relevant local authorities and infrastructure providers. Accordingly, I have no objection from the housing portfolio perspective to the project being referred to the next stage.

Thank you again for the opportunity to comment.

Mauriora,

Hon Tama Potaka
Associate Minister of Housing

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



24 AUG 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0037155

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 on the referral application for Cannon Point Development, FTAA-2605-1243.

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided by the applicants. The quantitative estimates below are drawn from economic assessments prepared for the applicant.

Cannon Point Development, FTAA-2605-1243

The application is for a residential and commercial land development on the northern edge of the Tōtara Park urban area in Upper Hutt. It would provide 162 dwellings, two commercial allotments, open space and reserves, walking and biking paths, ecological restoration, earthworks, and supporting infrastructure including roads, three waters, telecommunications, and electricity.

According to the economic assessment prepared for the applicant, the project is estimated to generate \$129.1 million in direct expenditure, excluding land, and contribute approximately \$126.6 million in value-added GDP to the Wellington regional economy over the five-year development period. The assessment also estimates 744 FTE-years of employment over the development period, comprising 352 direct FTE-years and 392 indirect and induced FTE-years. During the peak year of construction total employment will reach 261 FTEs. The total regional GDP NPV is estimated at \$149.6 million.

The application material does not provide estimates of the ongoing economic impact of the project on completion, so the quantified benefits are focused on development-phase impacts only. Wider regional benefits may include increased housing supply in Upper Hutt and the wider Wellington Region.

On balance, the proposal may have significant regional economic benefits under section 22(2)(a)(iv) of the Act, particularly through the estimated construction and development expenditure, regional GDP contribution, and employment supported during the development period; the proposal may also be relevant to section 22(2)(a)(iii), as it would increase housing supply and may contribute to a well-functioning urban environment.

Yours sincerely

A blue ink signature of Hon Nicola Willis, written in a cursive style.

Hon Nicola Willis
Minister for Economic Growth

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on Cannon Point Development under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on Cannon Point Development project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Nāku noa, nā

A handwritten signature in black ink, appearing to read 'Tama Potaka', with a large circular flourish at the end.

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

Your written comments on a project under the Fast-track Approvals Act 2024

Project name	Cannon Point Development
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name	Director-General of Conservation Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.		
*First name	Lana		
*Last name	Gooderham		
Postal address			
*Contact number	phone	s 9(2)(a)	Alternative
*Email	Fast-track@doc.govt.nz ;		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff



Celia Haden

Acting Fast-track Applications Manager

13 August 2026

Director-General of Conservation s17 comments

Project name	Cannon Point Development Ltd
Applicant name	Cannon Point Development Ltd
Application number	FTAA-2605-1243
Project summary details	The project is to construct and establish a master-planned residential and commercial development on a project area of approximately 36.99 hectares, located across 8 land parcels near Akatarawa Forest and Haukāretu Stream in the Upper Hutt, Wellington Region. The project comprises approximately 162 residential lots and two commercial lots with supporting infrastructure including roading, three waters services, stormwater management, and reserves. The applicant seeks the proposed approvals under the fast-track approvals process: • resource consents (including change or cancellation of a resource consent conditions) under the Resource Management Act 1991 • concessions under the Reserves Act 1977 • wildlife permits under the Wildlife Act 1953 • approvals under the Freshwater Fisheries Regulations 1983. The proposal involves works and infrastructure on three parcels of public conservation land managed under the Reserves Act 1977 and vested in Upper Hutt City Council.

1 Overview

1.1 Applicant Engagement

- 1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.
- 1.1.2 In relation to this application, DOC has had the following engagement with the applicant:
- DOC was notified of the application on 28 May 2026.
 - the referral application was lodged on 1 July 2026.



UNCLASSIFIED

- In the period available specific feedback was able to be provided as discussed below.

1.2 Ineligible Activity

- 1.2.1 The application proposes works on three parcels of public conservation land that is managed under the Reserves Act 1977. One of the parcels (Lot 301 DP 588162) has a stormwater management function. It is intended that this reserve be managed by Tiaki Wai in the future. As such, consideration needs to be given to the eligibility requirements of s5(1)(j) and s5(1)(k) of the FTAA as DOC does not consider that Tiaki Wai constitutes a local authority.
- 1.2.2 Further analysis is provided in Section 3 of this report. This analysis concludes that the proposal is not ineligible with respect to s5(1)(j) and s5(1)(k) of the FTAA.

1.3 Wildlife Approval

- 1.3.1 The referral application states that the Project may require a Wildlife approval for the capture, handling and relocation of lizards on the subject site on a precautionary basis. This is consistent with the advice provided by DOC at pre-lodgement stage.

1.4 Complex Freshwater Fisheries Approval

- 1.4.1 The application outlines that the proposal involves replacing existing culverts and seeks to enhance fish passage. Complex Freshwater Fisheries approval will be applied for as part of the substantive application if required. DOC considers that it is likely that Complex Freshwater Fisheries approval will be required based on the information provided.

2 Criteria for Minister's decision on referral application

- 2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.
- 2.1.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.2 Criteria for declining a referral application

- 2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.

Section	Criteria	Comments
		Section 3 of this report provides further assessment of eligibility, in particular in relation to the reserve land and the ownership and management arrangement.
21(3)(c)	Is there adequate information to inform a decision	With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the referral application should be declined.
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment	Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.3 Criteria for accepting a referral application

2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

2.3.2 DOC has considered these criteria and has not identified anything where DOC has specific interests or information relevant to the Minister's decision.

3 Ineligible Activity Assessment

3.1 Overview

3.1.1 As part of the application, the proposal involves works and installation of infrastructure on three parcels of public conservation land managed under the Reserves Act 1977; being Lot 2 DP 52931, Lot 1 DP 54694 and Lot 301 DP 588162¹. The application identifies the following activities/works on the reserve land:

- Earthworks to install a stormwater pipe and a walking track on Lot 2 DP 52931 (Local Purpose Reserve - Esplanade and River Protection)
- Earthworks to install a wastewater pipe on Lot 1 DP 54694 (Recreation Reserve)
- Earthworks to create and operate a stormwater treatment pond on Lot 301 DP 588162 (Local Purpose Reserve)

3.1.2 Both Lot 2 DP 52931 and Lot 1 DP 54964 are vested in and managed by Upper Hutt City Council.

3.1.3 Lot 301 DP 588162 is vested in Upper Hutt City Council, however, the Transfer Agreement² between Upper Hutt City Council and Tiaki Wai indicate that management of this reserve will be transferred at a future date. Tiaki Wai also confirms that the intention is for Lot 301 DP 588162 to vest with Tiaki Wai in the future.

3.1.4 It is noted that the intended function of Lot 301 DP 588162 is stormwater management and drainage. The lot was vested in Upper Hutt City Council as part of a previous subdivision. A bond is currently held by Upper Hutt City Council for the construction of a stormwater pond on the lot. Part of the proposed development under the referral application is intended to drain to the future stormwater pond.

3.2 Section 5 of the FTAA

3.2.1 Section 5 of the FTAA sets out the definition of ineligible activity. It is considered that s5(1)(j) and (k) are of relevance to DOC's assessment. These sections are as follows:

- (j) an activity that—
 - (i) would occur on a reserve held under the [Reserves Act 1977](#) that is vested in someone other than the Crown or a local authority; and
 - (ii) has not been agreed to in writing by the person or persons in whom the reserve is vested:
- (k) an activity that—
 - (i) would occur on a reserve held under the [Reserves Act 1977](#) that is managed by someone other than the Department of Conservation or a local authority; and
 - (ii) has not been agreed to in writing by the person or persons responsible for managing it:

¹ It is noted that works are also proposed on Lot 6 DP 46315, which is vested in Upper Hutt City Council but is not subject to the Reserves Act 1977. Upper Hutt City Council has confirmed that this lot has had its reserve status revoked.

² [UHCC and Tiaki Wai Transfer Agreement](#)

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- 3.2.2 As noted above, Lot 2 DP 52931 and Lot 1 DP 54964 are vested in Upper Hutt City Council and therefore s5(1)(j) and (k) are not applicable with respect to these parcels.
- 3.2.3 With respect to Lot 301 DP 588162, this lot is vested in Upper Hutt City Council at the time of writing this report. However, given that the Transfer Agreement intends that this reserve is managed by Tiaki Wai, consideration needs to be given as to whether s5(1)(k) is applicable.

3.3 Ineligible Activity Assessment

- 3.3.1 DOC consulted with Upper Hutt City Council and Tiaki Wai with respect to Lot 301 DP 588162. The formal management transfer of this reserve has not yet occurred, and there is currently no infrastructure on the lot; i.e. there are limited management responsibilities. Both parties confirmed that management of the reserve currently sits with Upper Hutt City Council. As it is intended that this reserve be transferred to Tiaki Wai in the future, Tiaki Wai considers that Upper Hutt City Council should consult with Tiaki Wai regarding any activities or decisions affecting the reserve.
- 3.3.2 For the purposes of this report, as Upper Hutt City Council still manages Lot 301 DP 588162, it is determined s5(1)(k) is **not applicable** to the referral application. To this end, no aspect of the proposal has been identified by DOC as being ineligible.
- 3.3.3 Notwithstanding the above assessment, the ownership and management status of the reserve is set to change once the transfer process is complete. As such, the above assessment applies only at the time of writing this report.
- 3.3.4 The Minister may choose to request further information from the applicant with regards to consultation with Tiaki Wai for the works proposed on Lot 301 DP 588162.

3.4 Conclusion

- 3.4.1 In conclusion, DOC has not identified any reason why the proposal should not be referred.



Celia Haden
Acting Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 13 of August 2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	FTAA-2605-1243 - Cannon Point
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	NZ Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
The proposed Cannon Point development is expected to increase traffic volumes on the local road network and at the State Highway 2/Tōtara Park Road intersection, with potential effects extending to the Tōtara Park Bridge, California Drive roundabout, and the wider state highway network. The SH2/Tōtara Park intersection is the only access available to Tōtara Park. The SH2/Tōtara Park intersection is constrained by the width of the bridge across the Hutt River with limited stacking space available for queuing vehicles at the intersection along the SH2 approaches, meaning that waiting vehicles, regardless of their destination, get delayed. Any further development at Tōtara Park will exacerbate these existing delays and has the potential to exceed the queue capacity of the lanes. Delays lead to driver frustration which can result in drivers making mistakes and may lead to drivers running amber and red signals. The delays and queue length can and does relate to an increase in rear end collisions. NZTA has consistently raised these concerns when approached for comments regarding ongoing development in the Totara Park area. NZTA has engaged with the applicant and its transport consultants throughout the development of their Fast Track transport assessment and has provided feedback on the modelling and associated transport documentation, initially provided in April 2026.

Insert Fast-track logo

In response to NZTA questions regarding delays on the SH2 approach to the Tōtara Park Road intersection, the applicant has provided a revision to their initial transport assessment, contained in Addendum A. NZTA and its operational traffic specialists have reviewed the transport assessment, modelling outputs, and Addendum A to that assessment submitted in support of the referral application and which includes additional information on the development's additional vehicle movements to and from Tōtara Park and their effects on the local and state highway network.

The result of the development traffic will be increased and unacceptable delays on all legs of the intersection, increasing existing delays by approximately 30 seconds for vehicles exiting Tōtara Park in the AM peak-period. NZTA notes this location already operates under constrained peak-period conditions and receives ongoing feedback about delays and queuing, mainly due to limited stacking space where the eastern end of the bridge joins SH2. NZTA also notes that any signal optimisation would likely need to rebalance the cycle to recover some of the additional delay which would require green time to be taken from elsewhere in the cycle which may result in increased delays to northbound and southbound movements on SH2 during peak periods. The Tōtara Park approach to the SH2 intersection accounts for 24% of trips during the AM peak, meaning that the remaining 76% of users would expect additional delays to accommodate the additional green phasing from Tōtara Park. Any substantive application must show that traffic and related safety effects can be appropriately mitigated by identifying appropriate options beyond signal optimisation. Such options should include lane length/width changes on the SH2 approaches, and lane upgrade and bridge widening on the local road approach.

While NZTA has identified matters that will require further assessment, the anticipated impact on the SH2 intersection will require mitigating beyond signal optimising, therefore mitigation options should be identified and included with any substantive application, NZTA does not oppose the project being referred to the Fast-track Approvals process. NZTA would welcome the opportunity to provide further comment on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Nicola Foran

13/08/2026

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Cannon Point Development
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Tiaki Wai		
*First name	Matthew		
*Last name	Halll		
Postal address	Private Bag 39804, Wellington Mail Centre 5045		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Matthew Hall

Date 13/08/2026

Comments on FTAA-2605-1243 – Cannon Point Development, Upper Hutt

Comments on a referral application under section 17 of the Fast-track Approvals Act 2024

Status Final

Version 1.0

12.08.2026

Contents

Executive Summary	3
1 Introduction	4
2 Assessment Context and Ownership	4
3 Water Supply	4
3.1 Water - Sustainable Water Use.....	4
3.2 Water - Modelling.....	5
3.3 Water - Network Resilience	5
3.4 Water - Reticulation.....	6
4 Wastewater Supply.....	6
4.1 Wastewater – Receiving Pump Station.....	6
4.2 Wastewater – Stage 3 Connection.....	6
4.3 Wastewater - Reticulation	7
5 Stormwater Management	7
5.1 Water Sensitive Design.....	7
5.2 Stormwater - Treatment (Raingardens)	7
5.3 Stormwater - Retention (Hydrological Control)	8
5.4 Schedule 29 Stormwater Impact Assessment	8
5.5 Stormwater - Clearwater Flow Management	9
5.6 Stormwater - Flood Hazard (Hydraulic Neutrality).....	9
5.7 Stormwater - Title and Consent Notice Controls	9
5.8 Stormwater - Reticulation.....	10
A. Section 53 Comments Authors Statement of Expertise	11

Document

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Review History

Version	Reviewer	Role	Date	Signature
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Document Signoff

Approver	Role	Date	Signature
Matthew Hall	Head of Technical and Developer Services	13.08.2026	

Executive Summary

1. Tiaki Wai has reviewed the referral application by Cannon Point Development Ltd for the proposed Cannon Point Development at Totara Park, Upper Hutt, comprising 162 residential allotments and two commercial lots. Tiaki Wai's comments are provided in its capacity as the regional water services provider for water, wastewater and stormwater services, as the potential future owner and operator of vested three waters infrastructure, and as the potential future holder of any operational stormwater discharge consent.
2. Overall, Tiaki Wai considers that the application does not yet provide sufficient information to demonstrate that the proposed development can be appropriately serviced by public three waters infrastructure, or that the proposed stormwater management approach will achieve the required long-term environmental, operational and asset-management outcomes. Several matters are considered fundamental consent-level issues because they may affect the subdivision layout, earthworks, the number of lots able to be delivered, infrastructure ownership, and whether Tiaki Wai can support connection to or vesting of public networks.
3. For water supply, Tiaki Wai has identified unresolved matters relating to water conservation, updated network modelling, firefighting flows and pressures, and network resilience. The application does not clearly commit to rainwater harvesting for non-potable reuse, and the available water modelling does not appear to account for all relevant stages, intensification, or commercial demand. In addition, the proposed single-feed arrangement for Stages 1, 2 and 3 does not demonstrate compliance with Tiaki Wai's resilience expectations, including limits on the number of properties served from a single connection.
4. For wastewater, Tiaki Wai accepts that the peak-flow assessment, but considers that the application does not adequately assess the impacts of the increased wastewater volume on the emergency storage requirements at the Totara Park wastewater pump station, or potential downstream overflow effects. The proposed Stage 3 wastewater connection through Tulsa Park also requires confirmation to demonstrate that the route can be secured and has been accepted by the relevant landowner or reserve authority.
5. For stormwater, Tiaki Wai considers that the application requires further work to demonstrate a robust Water Sensitive Design process, accepted Schedule 29 Stormwater Impact Assessment, compliant hydrological control approach, verified rain garden sizing and access, clear ownership and maintenance arrangements, and adequate flood modelling. The application also needs to address source-control measures, consent notice requirements, clearwater flow management, Transpower constraints, and compliant stormwater easements with the Regional Standard for Water Services.
6. Tiaki Wai therefore recommends that these issues are resolved before any substantive application proceeds or before consent is granted. If consent were granted without this further information, Tiaki Wai may not support connection to the public water or wastewater networks, vesting of relevant public three waters assets, or transfer of any associated operational stormwater discharge consent. Any consent should include conditions and consent notices securing water conservation, on-lot mitigation where required, impervious-area assumptions, non-potable reuse, source-control restrictions, infrastructure design and testing requirements, and long-term operation and maintenance arrangements.

1 Introduction

7. Tiaki Wai has reviewed the Application from Cannon Point Development Ltd for Cannon Point Development, a proposed 162 residential subdivision with 2 commercial lots within Totara Park, Upper Hutt.
8. The author's qualifications, experience, code of conduct confirmation, scope of comments, and the documentation they have relied on are outlined Appendix A.

2 Assessment Context and Ownership

9. Tiaki Wai is providing comments as the regional water services provider responsible for water, wastewater and stormwater services within Upper Hutt and as the future infrastructure asset owner responsible for the ongoing operation and management of the proposed three waters assets and as potential future holder of any Greater Wellington Regional operational stormwater discharge consent.
10. Tiaki Wai's responsibilities include ensuring the safe, reliable, environmentally and financially sustainable water servicing, including providing adequate water supply capacity, storage, pressure and firefighting provision; managing wastewater collection and conveyance while reducing the risk of overflows and protecting public health; and managing stormwater networks and devices to ensure collection and conveyance of stormwater to mitigate the effects (water quality, quantity and flooding) on the downstream environment and communities.
11. Tiaki Wai considers that three waters infrastructure servicing the community is best owned, operated and maintained by a public entity rather than by private individuals or entities, as public ownership provides greater security that ongoing operation and maintenance will be funded and carried out to the required standard, and that the outcomes required under the consent will be achieved over the long term. The application is presented on the basis of vesting of the three waters infrastructure to Council, whilst this can now largely be read as vesting to Tiaki Wai the proposed stormwater management (rain garden's) are proposed to treat only road runoff and it is not clear therefore if these represent a roading asset to be managed by Council or a stormwater asset managed by Tiaki Wai with the implication being that further comment on the number, location and layout of devices may also be required from Upper Hutt City Council (UHCC) Roading Team. Tiaki Wai considers that this is a fundamental consent level matter that requires resolution within the substantive application to ensure long term operation and maintenance of the stormwater solutions to achieve the required environmental outcomes.
12. Comments regarding proposed roading culverts, proximity of development to the wetland and existing waterways are not considered to be within the scope of the Tiaki Wai review.

3 Water Supply

3.1 Water - Sustainable Water Use

13. Tiaki Wai has not been able to identify a clear intent for water conservation measures to preserve water resources and their mauri. The Civil Infrastructure report identifies 'retention through installation of rainwater reuse tanks at all dwellings, while also reducing

mains consumption'¹ however all of the other documents provided including the AEE only reference on lot tanks for stormwater detention.

14. Tiaki Wai considers that on-lot rainwater harvesting and water metering should be conditioned, with the conditions requiring a preliminary design to be provided at the time of Engineering Approval to demonstrate the principles of the system for the future lot owners. In addition, a consent notice should be placed on the land title to ensure implementation of an approved solution at the time of building construction.
15. If consent were granted based on the current application (without water conservation), then Tiaki Wai would not support connection to the public water supply network.

3.2 Water - Modelling

16. The application advised that water network modelling has been completed to demonstrate the domestic and fire-fighting requirements are met for the development and that this has been reviewed and accepted by Wellington Water (now Tiaki Wai).²
17. Tiaki Wai advises that whilst Water Supply modelling was provided in support of the Stage 4 development,³ the modelling did not include for Stage 3, the intensification within Stages 1 and 2, or for the commercial lots. The application does not appear to include any additional water modelling in support of the conclusions presented within the referral application.
18. Tiaki Wai does not consider therefore that the application provides sufficient information to demonstrate compliant domestic water pressures, fire-fighting flows or fire-fighting pressures can be achieved. Tiaki Wai considers that this is a fundamental consent level issue which may impact on the proposed earthworks and number of lots able to be delivered and recommends that any substantive application is supported by water modelling approved by Tiaki Wai.
19. If consent were granted without further information, Tiaki Wai would not support vesting of the public water supply network until further detailed water modelling is provided to demonstrate compliant pressures and fire-fighting flows for Stages 3 and 4 without a detrimental impact on the existing Stages 1 and 2.
20. The outcome of the water modelling may require consent notices to be placed on the newly created land titles limiting development to one-dwelling per lot or for the commercial lots requiring on lot mitigation (sprinklers etc.) depending on the available fire flows and pressures.

3.3 Water - Network Resilience

21. The application has not addressed the network resilience constraints which limit the number of properties serviced via a single water connection to 50. Whilst this is not an issue for Stage 4 (where a loop main can be provided), the proposed single feed water supply through Stages 1, 2 and 3 is not compliant.

¹ Vecta, Civil Infrastructure Report, Cannon Point Development, Section 7.2.4, Pg 40

² Vecta, Civil Infrastructure Report, Cannon Point Development, Section 9, page 74

³ Totara Park Water Network Assessment, Cannon Point Development, Project Number: 24094, Vector, March 2025

22. Tiaki Wai network resiliency requirements are stipulated with the Regional Standard for Water Services (RSWS) to minimize the number of properties impacted by network failure or planned maintenance, in particular properties unprotected network failure / planned maintenance means fire flows cannot be provided.
23. The application does not discuss network resiliency and Tiaki Wai considers that this is a fundamental consent level issue which may impact on the proposed layout and number of lots able to be delivered within Stage 3. Tiaki Wai considers that resiliency options must be explored and agreed with Tiaki Wai prior to lodgment of any substantive application.
24. If consent were granted without further information, Tiaki Wai would not be able to guarantee domestic and fire-fighting flows to all new dwellings and would not therefore support connection to the public network.

3.4 Water - Reticulation

25. With the exception of the points above, the proposed layout appears to be consistent with the RSWS and SNZ PAS 4509-2008 Fire Fighting Water Supplies. Tiaki Wai considers that the water reticulation details can be refined through the Engineering Approval with appropriate conditions for the design, implementation (including metered connections) and post-construction testing of the network to demonstrate appropriate water servicing to each lot.

4 Wastewater Supply

4.1 Wastewater – Receiving Pump Station

26. Wastewater from the development is discharged to the existing public wastewater network within Totara Park, upstream of the Totara Park wastewater pump station (WWSP). The applicant has provided an assessment that considers the change to the peak inflow to the WWPS against the current pump performance. The assessment appears to be based on 46 Lots within Stages 1 and 2, and 207 within Stages 3 and 4 and therefore whilst there has been intensification within Stages 1 and 2 the assessment appears to include for additional properties within the catchment. Tiaki Wai considers that the assessment is likely to be conservative however the exact development numbers, inclusive of intensification, should be confirmed in the substantiative application.
27. The assessment does not however consider the effect of the increased volume of wastewater discharge on the pump station (emergency storage before spill / overflow occurs) or on the downstream network (wastewater overflows).
28. Tiaki Wai does not consider therefore that the application provides sufficient information to demonstrate that the additional wastewater volumes will not result in reduced performance leading to increased wastewater overflows to the receiving environment. Tiaki Wai considers that this is a fundamental consent level issue which may impact on the number of lots able to be delivered and recommends that an updated assessment is developed in consultation with Tiaki Wai to support any substantiative application.

4.2 Wastewater – Stage 3 Connection

29. The applicant proposes to extend a new public wastewater main from Stage 3 through proposed Lot 112 and Tulsa Park.

30. It is not clear to Tiaki Wai whether the proposed pipe route through Tulsa Park has been reviewed and accepted by UHCC Parks and Reserve Team and therefore if the off-wastewater main through Tulsa Park can be secured.
31. Tiaki Wai considers that this is a fundamental consent level issue which may impact on the ability to service Stage 3 for wastewater and recommends therefore that the substantive application is supported by written acceptance from UHCC for the proposed pipe route.
32. If consent were granted without further information, there is a risk that the wastewater connection will not be able to be secured.

4.3 Wastewater - Reticulation

33. Further to the comments above, the proposed layout appears to be consistent with the RSWs. Tiaki Wai considers that the wastewater reticulation details can be addressed through the Engineering Approval with appropriate conditions for the design, implementation (including connections) and post-construction testing of the network to demonstrate appropriate wastewater servicing to each lot.

5 Stormwater Management

5.1 Water Sensitive Design

34. Water Sensitive Design is not simply the selection of stormwater management devices. It is a design process that should influence the location, layout, scale, and form of development to avoid or minimise stormwater impacts, with residual effects mitigated through treatment and Hydrological Control devices.
35. Tiaki Wai has not identified a clear options assessment in the application documents demonstrating how alternative stormwater management approaches were considered. The referral application does not appear to include a stormwater options assessment, and it is not clear therefore how alternative treatment configurations, rainwater harvesting at different scales, infiltration opportunities where geotechnically feasible, or catchment-scale trade-offs between source control, distributed devices and centralised stormwater management areas have been considered.
36. Tiaki Wai considers that this is a fundamental consent level issue which may impact on layout, earthworks and number of lots able to be delivered and consider that the substantive application should be supported by a clear and detailed stormwater options assessment. It is considered that this assessment should outline how the stormwater design process has influenced the location, scale and form of the development with consideration to ownership, operation and maintenance. The options assessment should clearly identify and be developed in consultation with the future asset owner(s).

5.2 Stormwater - Treatment (Raingardens)

37. The infrastructure, report included within the application states that stormwater treatment will be achieved through both wetlands and raingardens. Tiaki Wai note that a wetland is proposed (but not yet delivered) for Stages 1 and 2, whereas the stormwater management for Stages 3 and 4 appears (despite what is shown on the scheme plan) to be in the form of two communal rain gardens.

38. The application provides a sizing for the rain garden proposed to treat road runoff from Stages 2B and 3 but does not include a catchment plan to support the areas provided and does not appear to provide calculations to support the rain garden serving Stage 4.
39. Tiaki Wai considers that the substantive application must clearly outline the stormwater strategy proposed which must be supported by calculations, including catchment plans for the road layout. Until these matters are resolved to Tiaki Wai's satisfaction, Tiaki Wai would not support vesting of the raingardens as public stormwater assets or the transfer of any associated operational stormwater discharge consent for the catchment. Tiaki Wai considers this to be a fundamental design matter that should be resolved before consent is granted, rather than deferred to detailed design.
40. A minimum 4-metre-wide access corridor is required to accommodate maintenance vehicles and excavators used for media replacement and inspection of vested rain garden devices. In addition to width, the access assessment should confirm safe operating conditions for each raingarden, including that working and turning areas. Whilst access appears to be provided the ongoing operation, and maintenance requirements do not appear to be discussed within the application. Tiaki Wai considers that the updated Stormwater Management Plan should outline the ongoing operation and maintenance requirements and how these will be achieved. Tiaki Wai will not support vesting of raingardens where adequate access cannot be demonstrated.

5.3 Stormwater - Retention (Hydrological Control)

41. Hydrological control addresses changes in runoff volume, runoff frequency and stream erosion potential arising from increased imperviousness. It is distinct from hydraulic neutrality, which addresses peak-flow attenuation for specified design events. Achieving peak-flow hydraulic neutrality does not, by itself, demonstrate that hydrological effects have been mitigated.
42. The Greater Wellington Hydrological Control Guidance Note (September 2025) establishes a hierarchy that prioritises rainwater harvesting and non-potable reuse, followed by land disposal or infiltration where practicable, with extended detention providing supplementary mitigation. As a supplementary mitigation measure, extended detention cannot be treated as the retention component when runoff volume is neither retained nor reused.
43. As previously noted, the applicant does not provide a clear discussion regarding hydraulic control (control to mitigate the increase in stormwater runoff volume in the mean annual event). Tiaki Wai considers that any substantive application should either be revised to include retention or should clearly address the residual effects of increased runoff volume and frequency on downstream stream bank stability (sediment mobilisation), ecological values and cultural values should be addressed. Until a compliant Hydrological Control approach is demonstrated to Tiaki Wai's satisfaction, Tiaki Wai will not support the vesting of the public stormwater assets.

5.4 Schedule 29 Stormwater Impact Assessment

44. Under the Greater Wellington Natural Resources Plan, a Stormwater Impact Assessment prepared in accordance with Schedule 29 is the mechanism through which stormwater treatment performance, Hydrological Control and receiving-environment outcomes are assessed together against the objectives of the Plan. Tiaki Wai has not identified an

accepted Schedule 29 Stormwater Impact Assessment in the application documents, and the Stormwater Management Plan does not appear to have been developed from one.

45. Tiaki Wai considers that an accepted Schedule 29 Stormwater Impact Assessment must form the basis of the revised Stormwater Management Plan, developed in consultation with UHCC, Greater Wellington Regional Council, local mana whenua groups (Taranaki Whānui ki Te Upoko o Te Ika, Te Ātiawa, Muaūpoko and Ngāti Toa) and Tiaki Wai. Until an accepted Stormwater Impact Assessment is in place, the treatment and hydrological control conclusions relied upon in the application cannot be verified against the outcomes sought for the receiving catchment.

5.5 Stormwater - Clearwater Flow Management

46. The applicant proposes to clearwater cut off drains uphill of Stage 3 to collect and convey stormwater to two stormwater inlets with stormwater pipes to convey stormwater downhill of the development, however the application appears to be silent on the long-term ownership, operation and maintenance of these features. Tiaki Wai considers that the substantive application should clearly identify the formation, ownership, easement requirements and ongoing operation and maintenance of the clearwater cut off drains to demonstrate how they will be managed long term.

5.6 Stormwater - Flood Hazard (Hydraulic Neutrality)

47. The application includes a Flood Hazard Assessment based on a HEC-RAS overland flow model and whilst flood hazard data is presented in Figures 36 and 37 these are at too small a scale to interrogate and are not supported by a flood modelling report inclusive of flooding modelling results (depths and velocities) and a comparison of pre and post development flooding is not provided. It is also not clear how Lots 86, 88, 89 and 90 and 91 have been included within the model. In the absence of a detailed flood modelling report Tiaki Wai are not able to comment on the validity of the information provided, the management of flood flows through the site or the effect of the development on existing flooding within the wider catchment, in particular within Wyoming Crescent which has been previously identified as being subject to increased flood depth.
48. Tiaki Wai additionally notes that the proposal relies on a number of clearwater cut off drains to convey stormwater from the uphill catchment to stormwater inlets with piped connections to convey stormwater past the development. Tiaki Wai considered that any flood modelling should include blockage scenarios and a sensitivity assessment to demonstrate the potential effects associated with failure or lack of management of the clearwater cut off drains. It is not apparent that this has been considered within the application.
49. Tiaki Wai considers that the provision of detailed flood modelling is a fundamental consent level issue which may impact on layout and earthworks and that a full and detailed flood assessment should be provided in support of any substantive application

5.7 Stormwater - Title and Consent Notice Controls

50. Tiaki Wai considers that source-control measures are necessary to protect the receiving environment and to ensure the long-term performance of the stormwater management system and that these should be secured through restrictions on exposed zinc, galvanised

steel and copper roofing, cladding and spouting materials, consistent with the direction of Plan Change 1 to the Natural Resources Plan.

51. Tiaki Wai also considers that consent notices should secure maximum impervious-area assumptions, rainwater-harvesting requirements and non-potable reuse connections. This implements the source-control intent of Proposed Plan Change 1 at the individual lot level and provides durable protection for the receiving environment that cannot be achieved through applicant-level stormwater devices alone.

5.8 Stormwater - Reticulation

52. The proposed layout requires a new stormwater main within close proximity to the Transpower National Grid Assets.
53. Whilst the application includes correspondence from Transpower this largely focuses on buildings, changes in ground level, planting and access. The Transpower guidance previously provided in support of Stage 4 stated 'no excavation or disturbance of land around the national grid tower, shall exceed 300 mm depth within 6 m of the tower', the updated letter provided in response to the referral application does not appear to make any comment on this restriction.
54. The substantive application should include written correspondence from Transpower that the excavation to install the new stormwater main within 6 m of the pylon that sits between Lots 24 and 25 is exempt from this requirement.
55. Further, the proposed stormwater pipelines that convey stormwater from uphill of Stage 3 through the development (past Lots 13 and 14, and through Lot 29) do not comply with the requirements of the RSWS, in that the easement straddles the private Lot boundary. Tiaki Wai considers that there is no reason why the greenfield development layout cannot comply with the requirements of the RSWS. Tiaki Wai therefore believes that an updated compliant layout should be provided in support of the substantive application.
56. Finally, and as previously noted the proposed layout requires stormwater assets to be constructed above and below the housing and road layout. The application appears to be silent on how access to these areas, in particular the proposed clearwater cut off drains and associated inlets will be achieved for ongoing operation and maintenance. Tiaki Wai considers that the updated Stormwater Management Plan should outline the ongoing operation and maintenance requirements and how these will be achieved. Tiaki Wai will not support vesting of public infrastructure assets where adequate access cannot be demonstrated.
57. With the exception of the above points, the proposed layout appears to be consistent with the RSWS. Tiaki Wai considers that the wastewater reticulation details can be addressed through the Engineering Approval with appropriate conditions for the design, implementation (including connections) and post-construction testing of the network to demonstrate appropriate stormwater servicing to each lot.

A. Section 53 Comments Authors Statement of Expertise

Tiaki Wai Comments - Author

Zeean Brydon has produced Tiaki Wai's comments on behalf of Tiaki Wai. Zeean is engaged as Consultant Peer Reviewers for Tiaki Wai's Land Development Consenting Team. Her qualifications, experience, code of conduct confirmation, the scope of comments, and the documentation relied on are outlined in the following Qualifications and Experience and Documentation sections.

Qualifications and Experience: Zeean Brydon

My full name is Zeean Brydon.

I am a Civil Engineer with over 30 years of experience in three waters engineering and flood management. My academic and professional qualifications include:

1. Bachelor of Civil Engineering (Hons);
2. Member of Engineering New Zealand;
3. Member of the New Zealand Water and Wastes Association.

I have been a Principal Engineer at 'e2Environmental' for the last 12 years. My expertise is in three waters infrastructure, particularly water reticulation, wastewater reticulation and pumping, flood mitigation, and stormwater collection, conveyance and management. For the last eleven years I have been engaged by Wellington Water Limited (now Tiaki Wai) as a technical expert to assess resource consent applications.

Code of Conduct

I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing these comments. I confirm that the issues addressed in these comments are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

Scope

The scope of my comments is about the water, wastewater and stormwater servicing, flood hazards, and stormwater management (collection, conveyance and management to achieve water quality and quantity outcomes. My comments have been prepared on behalf of Tiaki Wai as both a possible future infrastructure owner and holder of any GWRC operational stormwater discharge consent.

Involvement in the Proposal

Tiaki Wai engaged me to provide comment on the Cannon Point Development – Referral Application. I have been involved with this development since Stage 1, consenting Stages 1 and 2, and then providing Engineering Approval and s224 for Stages 1 and 2 as well as consenting a number of intensifications within Stages 1 and 2.

The reports I have relied upon in preparing my comments are listed in the following documentation section.

Documentation

I have reviewed the Application from Cannon Point Development Ltd for Cannon Point Development, a proposed 162 residential subdivision with 2 commercial lots within Totara Park, Upper Hutt, and have relied on the following additional documents in preparing my comments.

1. Cannon Point Development, Upper Hutt, Referral Application, As Lodged, 26 June 2026, Derive.
2. Cannon Point Development, Civil Infrastructure Report, 17 June 2026, Vecta and associated plans.
3. Scheme Plan
4. Master Plan
5. Transpower Letter
6. Landscape Strategy

Your written comments on a project under the Fast Track Approvals Act 2024

6 August 2026

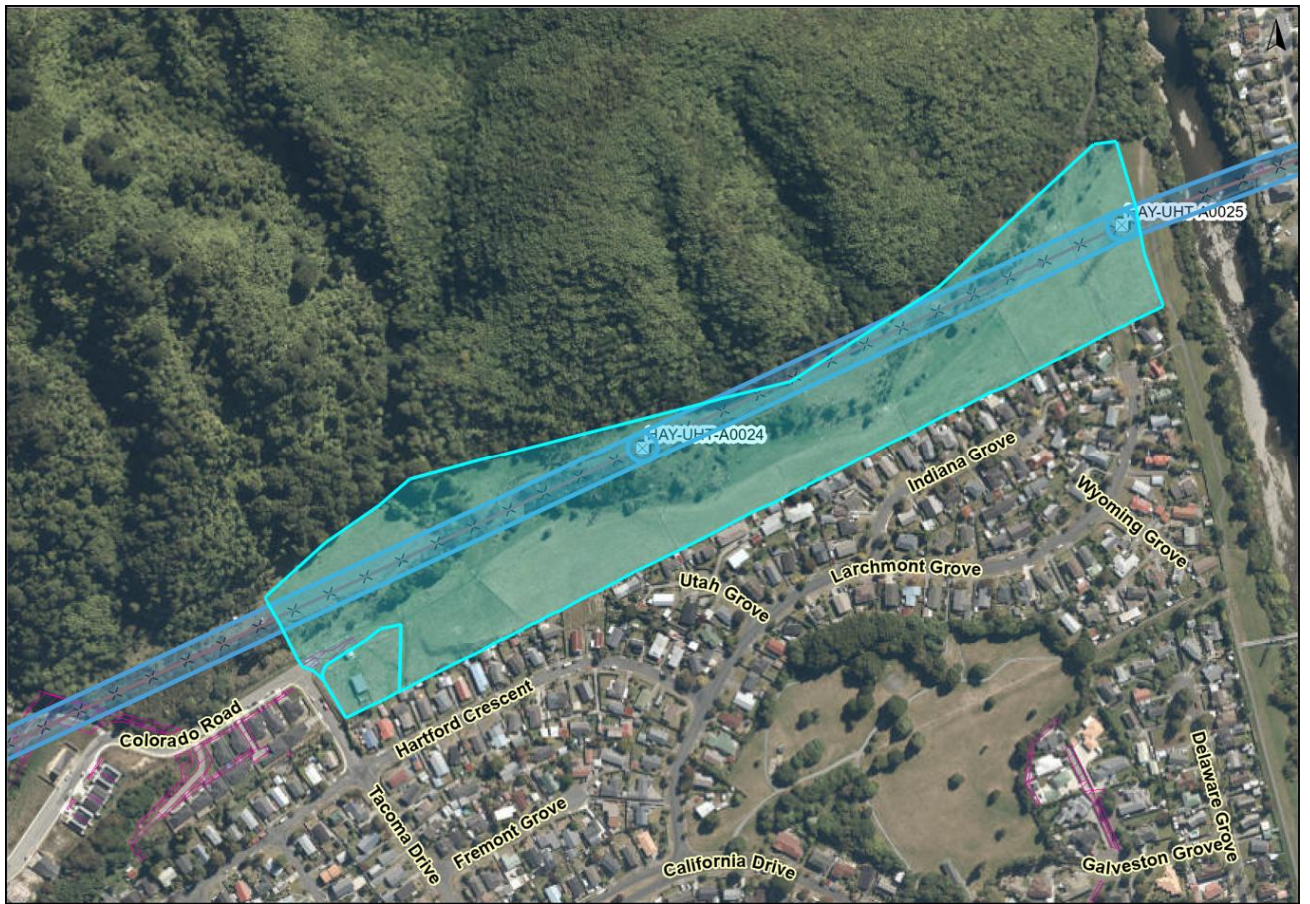
Project name	Cannon Point Development (Project) FDB002303R5C2
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited (Transpower)		
*First name	Andy		
*Last name	Eccleshall		
Postal address	PO Box 21-154, Edgeware, Christchurch 8143		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Transpower has been identified as an “other person” for the purpose of section 17(5) of the Fast-track Approvals Act 2024 (Act). Thank you for the opportunity to provide comments about the Project, and its potential impact on National Grid assets. The Project relates to the construction and establishment of a master-planned residential and commercial development in Lower Hutt, in the vicinity of Transpower’s 110kV transmission line that runs from Haywards to Upper Hutt (HAY-UHT-A). This line is an impotent link in the National Grid electricity transmission system. The transmission line, suspended from two line support structures, traverses through the entire East Block of the Project area. This location is shown in the image below:



The protection of the HAY-UHT-A line will need to be considered in the context of the Project. There are three key considerations –

1. *Compliance with NZECP 34:*

Proposed buildings, roading, alterations to ground level and construction activity must comply with the mandatory separation distances specified in the New Zealand Electrical Code of Practice for Electrical Safe Distances (NZECP 34). The heights of some buildings and structures may require restriction.

2. *Maintaining Suitable Access*

Transpower require access to the National Grid line support structures to enable large mobile plant (such as a crane) to operate at the structure for maintenance activities

3. *Enabling Appropriate Planting*

Landscape and amenity planting requires control to avoid negative impacts on the operation of the National Grid. Control provided by the Electricity (Hazards from Trees) Regulations 2003 enables height management of amenity trees through topping or removal of trees. However, a more bespoke approach that limits height by species type and location will maximise amenity outcomes and avoid hazardous and costly maintenance of vegetation height.

Final comments

The current design reflects Cannon Point Development Ltd's engagement with Transpower, through which design changes have been made to respond to Transpower's interests in protecting the National Grid.

We would expect that these matters would be addressed as part of the substantive application, and subject of conditions on any approvals granted.

Transpower would appreciate the opportunity to comment on any substantive application, to ensure these matters are addressed.

Fw: You have a new Request from Fast-track Application Team CRM:0139018436

From Fast-Track Info <info@fasttrack.govt.nz>

Date Thu 13/08/2026 1:40 PM

To FTAreferalls <FTAreferalls@mfe.govt.nz>

MFE CYBER SECURITY WARNING

This email originated from outside our organisation. Please take extra care when clicking on any links or opening any attachments.

Kia ora,

Tipene Chrisp from Rangitāne Tū Mai Rā emailed to say they have no comment on the Cannon Point development referral application.

Please see the below email chain for more information.

Kind regards,

Rudi Murray-Pyle (he/him)

Advisor, Regulatory Process



Fast-track is administered by the Environmental Protection Authority. The EPA's New Zealand Business Number is 9429041901977.

This email message and any attachment(s) are intended for the addressee(s) only. If you receive this message in error, please notify the sender and delete the message and any attachments.

From: Tipene s 9(2)(a)

Sent: Thursday, 13 August 2026 12:17 pm

To: Fast-Track Info <info@fasttrack.govt.nz>

Subject: FW: You have a new Request from Fast-track Application Team CRM:0139018436

Tēnā koutou.

I refer to the e-mail below that was sent to Rangitāne Tū Mai Rā with regard to Fast Track Application CRM 0139018436 (Cannon Point Development). I have not been able to navigate your portal, so am e-mailing our response to the request.

Cannon Point is outside of the traditional rohe (customary area of interest) of Rangitāne Tū Mai Rā. On this basis, we have no comment on this proposal. I am sure that you will be engaging with our neighbouring iwi of Taranaki Whānui and Ngāti Toa.

Tipene Chrisp
GM, Rangitāne Tū Mai Rā

s 9(2)(a)

s 9(2)(a)

From: FTA NoReply <NoReply@fasttrack.govt.nz>

Sent: Thursday, 23 July 2026 15:42:57

To: Darrin s 9(2)(a)

Subject: You have a new Request from Fast-track Application Team CRM:0139018436

Dear Darrin Apanui

The Fast Track Application team requests that you provide feedback on the Application (Cannon Point Development) regarding Rangitāne Tū Mai Rā Trust - Cannon Point Development.

The application and associated documents can be viewed through our portal.

Your response can also be uploaded to the portal.

The Team have requested that you provide your feedback by :13-08-2026.

Should you need any assistance during the registration or application process, please contact us at info@fasttrack.govt.nz or call 0800 327 875.

We thank you for your diligence in this matter and look forward to working with you through the application process.

Thank you for your attention to this matter.