**FTAA-2603-1181**

**Recommend Before the Panel Convener appointed under the Fast-track Approvals Act 2024**

| | |
|---|---|
| **Under** | the Fast-track Approvals Act 2024 |
| **In the matter of** | Mt Welcome, Pukerua Bay |
| **By** | Pukerua Property Group Limited Partnership |

---

**Appendix B - Planning Response Memorandum**

**7 August 2026**

---

**INTRODUCTION**

1 My name is Torrey James McDonnell. I am employed as a Principal Planner by Incite Wellington 2012 Limited (Incite).

2 I have prepared this memorandum on behalf of Pukerua Property Group Limited Partnership (the Applicant) to respond to planning and related matters raised by various parties through comments provided to the Panel under section 51 and 53 of the Fast Track Approvals Act (FTAA).

3 In accordance with section 53(2) of the FTAA, the Panel issued Minute 3 inviting comments from relevant parties, with comments due on 31 July 2026.

4 In addition, in accordance with section 51(2) of the FTAA, the Department of Conservation (DoC) and Heritage New Zealand Pouhere Taonga (HNZPT) provided reports on 17 July 2026 as directed by Minute 1 of the Panel Convener (dated 12 May 2026).

5 Two parties commented under section 51 of the FTAA, and 19 parties commented under section 53. A summary of all the comments received, and the Applicant's overall response, is set out in Appendix A of the Applicant's Response.

6 In addition, this memorandum responds to Minute 7 dated 4 August 2026 requesting commentary on the Panel's review of conditions for the following approvals: Complex Freshwater Fisheries Activity, Wildlife Approval and Archaeological Authority. This commentary is provided in appendices 6 – 8 to this memorandum, respectively, for these approvals.

7 As a result of the consideration of the comments, some changes or amendments to the proposal including supporting plans or reports are proposed to be made. The following updates to the Application that the Applicant and project team consider are required are summarised as follows:

a. Additional regional consents are required to authorise aspects of the proposal as outlined in Appendix 1 in response to GWRC comments;

b. Changes are recommended to proposed district and regional consent conditions including additions and deletions as outlined in Table 1 below (with regard to expert opinion) and Appendix 2 and 5 of this Memorandum for changes sought by GWRC and PCC respectively;

c. Changes are recommended to conditions of other approvals in response to Minute 6 of the Panel (refer appendices 6, 7 and 8 of this Memorandum); and

d. Changes to engineering plans and reports as outlined in Envelope's memorandum in Appendix C of the overall response.

8 None of these changes alter the overall scale, nature or effects conclusions reached in the substantive application. Rather they provide a more efficient and effective design and effects management framework for the proposal.

9 I note that a number of parties are recommending changes to conditions of consent through their comments. The intent of these recommendations has been considered as part of this response, however an updated set of proposed conditions is not provided due to the time constraints and the process for review of draft conditions later in the FTAA process. Further, it is noted that the updated set of proposed conditions provided to the Panel on 31 July 2026 in response to Minute 5 was not available to other parties when providing their comments, and they have been asked to comment by 7 August 2026 through Minute 6. A further iteration of proposed consent conditions can be provided in response to a request for further information from the Panel under Section 67 of the FTAA.

10 The changes recommended to proposed consent conditions in this Memorandum and appendices include:

a. Changes to proposed regional conditions in response to feedback from GWRC including:

i. Requirement for an Ecological and Hydrological Management Plan (EHMP) to be certified by GWRC;

ii. New conditions requiring continuous water monitoring and adaptive management provisions associated with the continuous monitoring approach;

iii. Amending condition 57 clarifying fish passage is required in the Taupō Stream culvert in addition to retention wetlands B and E;

iv. Cross-referencing of contaminated land conditions to the NES-CS land use consent framework;

v. Requirement to demarcate retained wetlands before nearby earthworks commence;

vi. Wetland-specific performance targets (including vegetation establishment outcomes) being carried over into conditions.

b. The Applicant is not proposing to pay financial contributions under P.R10, as such this means stormwater discharges are now a non-complying activity under Rule P.R11.

c. Changes to proposed district conditions in response to planning comments from PCC including:

i. A new condition restricting duration of temporary buildings;

ii. New condition to require future open space land on Lot 5003 if required;

iii. A new condition requiring consent notices to alert landowners on relevant lots to conservation covenants;

iv. Requiring stage-specific Construction Traffic Management Plans;

v. Amending condition 23 to provide for public access along Ara Harakeke during wastewater upgrade works in State Highway 59 Road Reserve;

vi. Amending condition 19 so that PCC provides input rather than certification of the Stage Specific Erosion and Sediment Control Plan (noting GWRC will retain responsibility for certification);

vii. A change to the SSESCP certification process so that PCC provides input by GWRC is the main certifier;

viii. A condition should be added addressing helicopter operations requiring that noise modelling should be undertaken, and acoustic insulation requirements should be identified where necessary.

d. A new condition requiring a Landscape Mitigation and Reinstatement Plan for landscaping works in State Highway 59 in response to landscape feedback from PCC;

e. Changes to contaminated land conditions in response to SLR Consulting review on behalf of PCC

f. Changes to geotechnical conditions in response the T&T review on behalf of PCC as outlined in ENGEO Memorandum

11 A statement of my qualifications and experience is set out in Section 2.1 of the Substantive Application. I confirm that I have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. I have complied with the Code of Conduct in preparing this memorandum and will continue to comply with it while giving oral evidence before the Panel. Except where I state that I am relying on the evidence of another person, this written evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in this evidence.

**DISCUSSION**

12 The Applicant's team of technical experts have provided information to respond to matters relevant to their disciplines. I have relied on the expertise of these specialists where matters fall within their respective disciplines. This information includes:

- Kyle Dirse (Envelope Engineering) with regard to civil engineering matters (**Appendix C**);
- Dr Vaughan Keesing (BlueGreen Ecology) with regard to ecological matters (**Appendix D**);
- Dr Tony Payne (Blueprint Ecology) with regard to lizard management (**Appendix E**);
- Katy Grant (PDP) with regard to hydrology and contaminated land (**Appendix F**);
- Jamie Whittaker (Stantec) with regard to transport matters (**Appendix G**);

- Brad Dobson (Blac) with regard to landscape and urban design matters (**Appendix H**);
- Karen Jones (ENGEO) with regard to geotechnical matters (**Appendix I**);
- Adam Thompson (Urban Economics) with regard to economics (**Appendix J**); and
- Patrick Harsveldt (Heritage & Archaeology Services Ltd) with regard to an updated Archaeological Management Plan (**Appendix K**).

13 In addition, a Memorandum of Counsel is provided as **Appendix L**.

14 In this memorandum, I respond to planning matters raised in comments including:

a. Consent duration/lapse period for consents;
b. Planning matters raised by Greater Wellington Regional Council (GWRC);
c. Planning matters raised Porirua City Council;
d. Changes sought to proposed consent conditions.

**Consent duration/lapse period for consents**

15 Various submitters disagree with the proposed duration and lapse period for consents including Te Awarua-o-Porirua Harbour and Catchments Community Trust and Guardians of Pāuatahanui Inlet (05), Friends of Taupō Swamp and Catchment Incorporated (06), and the Plimmerton Residents Association (16). The submitters generally seek a five year "duration".

16 I note that under the RMA consent duration differs from lapse period. Land use and subdivision consents generally have unlimited duration once given effect to. The consent continues to authorise that land use or subdivision outcome unless the consent itself says otherwise. The lapse period however is the time period within which a consent must be given effect to before it lapses. I consider that it is likely the submitters above are referring to lapse period rather than duration.

17 GWRC has summarised the durations for regional consents in their comments, and agrees with the durations sought as follows:

> 26. The Applicant has sought 10-year consent durations for construction-related consents, 35-year durations for ongoing damming and diversion and stormwater discharges, and an in-perpetuity duration for the land use consent to create or redevelop impervious surfaces. Greater Wellington agrees with the durations proposed by the Applicant, on the basis that the durations proposed by the Applicant are from the commencement of the consents

18 I note that PCC supports a three-year lapse period for the landuse consent, and a 15 year lapse period for subdivision consent provided the first stage is given effect to within three years[1].

19 GWRC states in its comments that it disagrees with the 15 year lapse period for regional consents:

> 27. The Applicant has sought 15-year lapse periods for all consents. Greater Wellington disagrees with the lapse period proposed by the Applicant for the following reasons:
>
> a. A 15-year lapse period is a significant departure from the default lapse period of 2 years under the FTAA and 5 years under the RMA.
> b. A 15-year lapse period creates significant uncertainty about whether or when the consents will be given effect to. This is because a consent holder need not make any substantial progress towards giving effect to the consent for 15 years. Over this time period, it is likely that the planning framework that applies to the activities for which consent is sought would be subject to review at least once, if not twice. In addition to this, the uncertainty associated with a 15-year lapse period casts doubt on whether the benefits identified by the Applicant will be realised at all, and if they are, whether they would still be as significant as claimed by the Applicant if substantial progress is not made until the end of the lapse period.
> c. For those consents where the Applicant has sought a 10-year duration, it does not make sense for a consent to have a lapse period that is longer than its duration, as a consent cannot be given effect to after it expires.

20 The rationale for the 15 year lapse period sought by the Application is set out in Section 7.12 of the Application. I consider that 15 years is appropriate for both land use, subdivision and regional consents for the reasons outlined in Section 7.12 including both the long-term staging of construction and the project complexity.

[1] Refer page 77 of Appendix 2 to the Substantive Application.

21 While I acknowledge the default minimum of two years in the FTAA[2], the lapse period sought by the Applicant is in line with minimums set by other FTAA panels for large residential developments. For example, both the Homestead Bay and Sunfield project approvals provide for a 15 year lapse period for subdivision consents provided the first stage of the development is given effect to within five years. I also note that PCC supports a longer lapse period than the statutory default.

22 However, I have considered the issue raised by GWRC in paragraph 27(c) of their comments, I consider that the regional consents with a 10 year duration should have a 10 year lapse period or the reasons they have outlined.

**Planning matters raised by Greater Wellington Regional Council**

23 The planning matters raised by GWRC in their comments are as follows:

a. Additional consents required;

b. Conditions of consent;

c. Financial contributions; and

d. Functional need to reclaim Taupō Stream.

24 These matters are assessed in turn below, including the relief sought by GWRC where applicable.

*Additional consents required*

25 Table 3 of GWRC's overarching comments sets out the regional resource consents that GWRC considers are required to authorise the activities proposed by the substantive

[2] Schedule 5 Clause 26 of the FTAA.

application. These are identified in yellow in Table 3 and are assessed in turn in Appendix 1 of this planning memorandum.

26 As outlined in Appendix 1, I agree with GWRC's assessment of these additional rule breaches, and consider that these rules should form part of the Application. The identification of these additional consents does not alter the physical scope of the proposal or identify adverse effects that have not already been assessed. I also consider that the correct RMA planning document objectives and policies have been assessed. The Memorandum of Counsel provides commentary on scope to assist the Panel.

*Conditions of consent*

27 GWRC have provided a set of proposed conditions in Appendix 1 to their comments.

28 Appendix 2 of this memorandum comments on the substance of these conditions, however as noted in the introduction to this memorandum, an updated set of proposed conditions is not provided due to the time constraints and the process for review of draft conditions later in the FTAA process. Regardless, I have considered each condition and provided commentary on whether I consider that the matter is sufficiently addressed by existing conditions, or if conditions are required to be amended, added or removed.

29 I note that GWRC provided their own preferred format rather than commenting on the conditions in the framework as proposed by the Applicant. I consider that the GWRC framework is highly repetitive and is not consistent with the clear and concise drafting style that the Applicant is aiming for. A clear and concise set of conditions will improve the ability of the Consent Holder and their contractors to comply with conditions, and for GWRC monitoring staff to check compliance.

*Financial contributions*

30 GWRC raises the following issue in their comments:

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.

31 The relief sought is as follows:

> Impose a condition that requires payment of financial contributions in accordance with Schedule 30 of NRP-PC1, with calculation and timing of payment to be based on the staging of stormwater discharges.

32 Paragraphs 84 to 89 of GWRC's comments provide more analysis of this issue. They outline how the financial contributions are proposed to be allocated as follows:

> The contribution is to distributed to the relevant stormwater network utility operator to be invested in catchment scale stormwater treatment projects within the same whaitua as the activity for which consent is sought, and if practicable, within the same part freshwater management unit.

33 The financial contribution required under Schedule 30 of PC1 for the creation of 949 lots equates to $4.3 million dollars.

34 Creation of impervious surfaces in the commercial area will be charged at $858 for 100m². The exact area of impervious surface will be confirmed when the commercial area is developed. However, the stormwater system has been designed with an assumption that 90% of the commercial area will be impervious which equates to a required financial contribution of $98,000.

35 The Applicant has not relied on financial contributions to conclude that stormwater effects are acceptable. The amount required as a financial contribution is unrelated to the actual potential effects associated with stormwater discharges from the Mt Welcome proposal. It has not been factored into the effects assessment as it is unclear what project(s) the fund will be allocated to and what the net benefits might be. The financial contribution is a form of environmental compensation for residual adverse stormwater effects under the effects management hierarchy.[3] The distribution of the net benefits is unknown noting that the site is within three catchment areas.

[3] Refer Plan Change 1, Schedule 30.

36 In my view financial contributions are not required in order to address the effects of the development as they have been assessed as being less than minor.

37 In the absence of any identified projects or anticipated environmental outcomes, it is difficult to determine what environmental benefit would arise from payment of the contribution and whether there is any connection between those benefits and the residual effects of the proposal. GWRC could perhaps clarify how they envisage allocating this money to Tiaki Wai and for which projects.

38 With regard to cumulative effects associated with the Northern Growth Area, combining Mt Welcome with the remainder of the Northern Growth Area this sum could be as much as $27.5 million dollars for the 6000 proposed lots, with more required for non-residential impervious surfaces. This is a significant sum, but again the net benefits with regard to management of any cumulative effects in the catchment are unknown.

39 Plan Change 1 was partially through hearings when GWRC decided to pause the hearings indefinitely. The provisions in Plan Change 1 that require financial contributions are yet to be heard by the Panel. It is noted that they are strongly opposed by a number of submitters. In my view, the Panel should give little weight to Schedule 30.

40 Variation 1 was introduced to delay the payment of these financial contributions due to the indefinite pause of the hearings process, as set out in Paragraph 86 of GWRC comments:

> On 1 December 2025, Schedule 30 was amended by Variation 1 to NRP-PC1 specify that the timing for payment of financial contributions by consent holders will be no earlier than 1 June 2027.

41 Since that time, there has been no further update regarding if or when GWRC intends to progress PC1. This prolonged pause reinforces uncertainty regarding both the future status and final content of the financial contribution framework. In my view, as outlined above there is considerable uncertainty and it would be more appropriate that financial contributions are not required by way of consent condition.

42 It is unclear whether financial contributions would be returned to consent holders if the relevant provisions are reduced or removed from Plan Change 1.

43 In my view, requiring financial contributions as a consent condition may result in further costs and regulatory uncertainty for the consent holder. They may also be in consistent with future planning framework. For example, should the provisions be amended or removed through a hearings process, GWRC anticipates that the consent holder would make an application under s127 to amend or remove their proposed condition 95. The advice note at the end GWRC's conditions set in Appendix A to their comments states:

> Note: Financial contributions identified in this condition are for the Te Awarua-o-Porirua Whaitua as identified in Schedule 30 of NRP-PC1. If the amount of financial contributions payable changes because of any plan change process prior to those charges being required to be paid, the applicant may apply for a change of condition under section 127 of the RMA.

44 Applying for a s127 change of conditions would result in further costs for the consent holder in terms of processing costs including consultant fees.

45 In my view and for the reasons outlined above, the Applicant should not be required to pay financial contributions as per Schedule 30. It is not required in order to address the adverse environmental effects of the proposal, and there is considerable uncertainty around PC1 meaning the relevant provisions should be given little weight. This means that the proposal would not comply with Rule P.R10 and the stormwater discharges require consent as a non-complying activity under Rule P.R11.

*Functional need to reclaim Taupo Stream*

46 GWRC raises the following issue in her comments:

> 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.

47 The relief sought is as follows:

> Consent should not be granted to reclaim the Taupō Stream, unless the Panel is satisfied that the proposed roundabout is the only practicable option to provide for access to the site from SH59 in that location.

48 GWRC's comments state:

> 101. The application does not include any direct evidence from NZTA in relation to the design of the intersection. Rather, the Applicant's minutes of meetings with NZTA are included in the Applicant's record of consultation. At a meeting on 11 November 2025, NZTA are recorded as suggesting:
>
> > *the developer could instigate changes to the corridor to change the environment to a lower speed environment. This could change the nature of the intersection intervention required. This would need to be progresses [sic] in conjunction with NZTA and PCC.*
>
> 102. Greater Wellington considers that for there to be a functional need to reclaim the tributary of the Taupō Stream, it must be demonstrated that the intersection needs to be located over the river bed. To demonstrate a functional need, Greater Wellington considers that it needs to be demonstrated that there are at least no reasonably practicable alternatives to providing for the functional requirement (i.e. the intersection) in a location that would avoid the need to reclaim the river. In this case, it appears that a signalised intersection is an alternative approach that could avoid the reclamation of the river. Whether this is a reasonably practicable alternative turns on whether the speed limit within SH59 is lowered, and this appears to be a plausible outcome that is at least partially within the control of the Applicant (as indicated by NZTA in the minutes to the 11 November 2025 meeting). That this is a plausible outcome is reinforced by the Applicant's approach to the design of the roundabout, which allows for a potential reduction in the speed limit to 60 km/h.
>
> …
>
> 107. On the matter of whether there is a functional need to reclaim the stream to construct an intersection, the Applicant has stated at paragraph 13 of their response to Minute 4 that:
>
> *A signalised option remains the applicant's preferred option should NZTA accept a signalised intersection in the future in advance of the roundabout needing to be constructed.*
>
> 108. Greater Wellington considers that this statement further demonstrates that there is real uncertainty about whether there is a functional need to reclaim the Taupō Stream to construct an intersection at SH59.

49 It is clear that there are no reasonably practicable alternatives. NZTA is the road controlling authority and they require a dual-lane roundabout. Access to the site therefore requires a roundabout, and the footprint of the roundabout requires reclamation of the stream.

50 I note that NZTA's section 53 comments are unequivocal about the requirement for the intersection to be a dual lane roundabout based on route function, characteristics, and speed limit:

> *5.3 If required, NZTA is open to continuing to work with the Applicant to look at refinements for delivering the permanent intersection (dual lane roundabout).*

*5.4 Paragraph 13 of the Applicant's response to minute 4, expresses the Applicant's preference for a signalised intersection. However, the ITA and crash risk evaluation provided with the application identified the dual lane roundabout as the most appropriate long-term access treatment and did not consider either a signalised intersection or priority-controlled intersection arrangement to be a feasible alternative.*

*5.5 The route function, operating characteristics, and 100km/h speed limit of SH59 do not support the introduction of either a signalised intersection or a priority-controlled T-intersection (beyond the initial construction and development threshold discussed in points 4.4 – 4.10).*

51 Just because the Applicant, PCC and Ngāti Toa have a preference for a strategic review that may lead to an urbanised corridor that could safely accommodate a signalised intersection, this does not equate to uncertainty about the functional need to have a dual lane roundabout. The possibility that a different intersection form could become available in this corridor in the future does not negate the existence of a functional need at the time this application is determined.

52 I consider that the Application does demonstrate a functional need to reclaim the Taupō Stream (refer Appendix 8), and that this is reinforced by NZTA comments above. I consider this is also supported by the legal submissions prepared by the Applicant's legal advisors.

**Porirua City Council (PCC)**

53 The main planning matters raised by PCC in their Planning Report are as follows:

a. Assessment of PDP rules and standards

b. Alignment with Structure Plan

c. Providing for medium density housing

d. Ecology effects management

e. Conditions of consent

f. Consistency with RMA Planning Documents

54 These matters are assessed in turn below, including the relief sought by PCC where applicable.

*Assessment of PDP rules and standards*

55 Section 5 of PCC's planning comments states:

> I consider that 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.
>
> In summary, there are a number of relevant rules and standards that have not been assessed in the application. In many other instances, the assessment that has been provided contains errors, is incomplete, or provides incorrect information. This has made it difficult to understand the scope of necessary assessment of the proposed activities under the PDP.

56 My colleague Tom Anderson (Principal Planner and Director at Incite Wellington 2012 Limited) has reviewed PCC's Appendix B and provided commentary on each matter in Appendix 3 of this memorandum.

57 While PCC has identified a number of areas where it considers further clarity or assessment is required, I consider that the relevant consent triggers have correctly been captured. 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.

58 On that basis, the Panel can reasonably proceed on the understanding that the Appendix 3 responses provide sufficient clarification for assessment purposes, subject to appropriate conditions being imposed to ensure that future detailed design and implementation remain within the effects envelope assessed through the application process.

59 One matter identified in Appendix B which I consider could benefit from a condition of consent is in relation to TEMP-R1. I consider that a condition of consent is added requiring that temporary construction buildings are removed within one month of construction being completed in any given stage. This condition directly responds to the uncertainty PCC identified about the duration and management of temporary construction buildings under TEMP-R1.

*Alignment with Structure Plan*

60 There are various issues raised in the PCC planning response with regard to features that are on the Structure Plan in the Northern Growth Development Area Chapter in the Porirua District Plan. These are addressed below in turn.

Tracks

61 6.3.3.1 of PCC's planning comments states:

> The track network is discussed, with the eastern-most track shown on the Structure Plan noted as not being provided for. The urban design review recommends it to be shown on the application plans and a condition of consent included so that it is implemented at the time the wider loop is delivered with the wider development of the NGDA. An additional off-road track connection is also recommended from the Upper Terrace as an extension of the track that terminates to the south of Road 7 as no northern connection is currently provided for in accordance with the Structure Plan.

62 The Application acknowledges that the proposal does not fully give effect to the Structure Plan as outlined in Appendix 8 of the Application as follows:

> **Eastern walking track and walkway connection**
>
> Walking tracks are provided for in the general locations in the Structure Plan, with the exception of the eastern most track that connects the Muri Block to the North to the Skaiffe Block to the South.

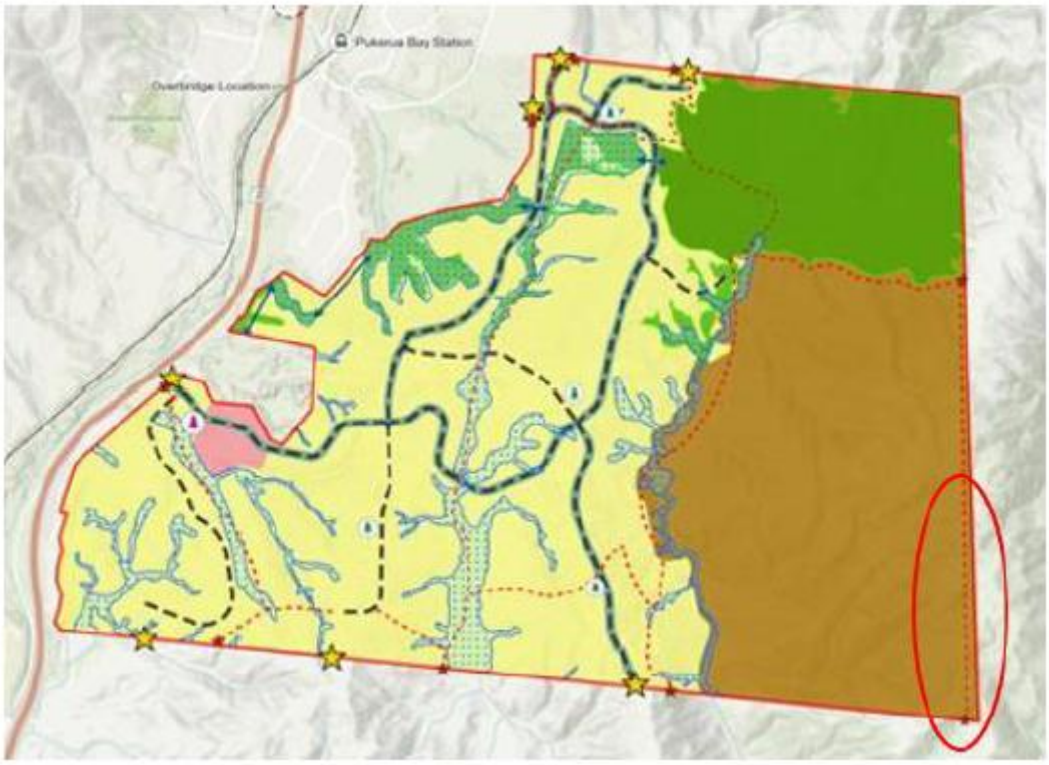



**Figure 8: Eastern walking track connections**

This is because the Applicant does not own the land where this indicative road is located. Lot 5003 will be retained by the Mount Welcome Block Trust for continued farming use. If this landowner wished to subdivide in the future, they too would be subject to the Structure Plan.

However, the development is designed in such a way in that it does not preclude a future pedestrian link in this location. Figure 9 below is an excerpt from the Master Plan and Landscape Urban Design Strategy showing where a future walking connection to the east could be provided from the development.


**Figure 9: Potential future eastern walking track connections**

63 I do not agree that the plans need to be amended or a condition of consent included requiring the far eastern walkway be provided in the future. The Applicant has provided an indicative location for a trail head in the MLUDS (page 31), which could feasibly be located within the reserve at the end of Road 27 in Stage 16A. As such, the development does not preclude this aspect of the Structure Plan being given effect to in the future.

64 I note that Brad Dobson has responded to the latter point raised by PCC in his memorandum with regard to the track that terminates to the south of Road 7.

<u>Connections across SH59</u>

65 Section 6.3.3.5 of PCC's planning comments states:

> The provision for pedestrian and cycling access at the SH59 entry point is discussed. The review recommends that a crossing opportunity be provided to allow connection to Ara Harakeke pathway, either by altered roundabout design or preferably a signalised intersection.

66 Further, section 6.10.2.3 states:

> To address the lack of active mode integration beyond the site, I consider that it would be appropriate to require an active mode crossing (being grade separated or signalised) to be constructed and operational before occupation of Stage 1 of the development. Alternatively, a separated active mode pathway north through the

> Muri Block to Muri Road could be required to be provided as part of the Mt Welcome development through a condition precedent.

67 The Applicant is not providing an active mode connection across SH59 to the Ara Harakeke shared path on the western side of SH59. This is not feasible with NZTA's requirement for a dual-lane roundabout, which limits safe crossing options. However, a future connection is not precluded with footpaths provided to the location indicated on the Structure Plan, noting the Structure Plan identifies the location of a future connection but does not require delivery of the crossing as part of this proposal.

Transport connections to the southern boundary

68 Section 6.4.3.1 of PCC's planning comments state:

> 6.4.3.1 Transport connections to the southern boundary
>
> The NGDA Structure Plan (see Figure 4) identifies three 'Transport connections' along the southern boundary. The application has provided for one roading connection to the southern boundary, in the general vicinity of the middle connection point (approximately 120 metres east of the location identified on the Structure Plan). The western and eastern Transport Connection points are precluded by the subdivision design which does not allow for a future connection to be created to the proposed roads that terminate close to those Transport Connection points.
>
> In my view, it is critical that the subdivision design allows for the transport connections along the southern boundary to be made in the future. The Council has previously identified this as a critical issue throughout pre-lodgement consultation with the Applicant. Construction of the roads to the boundary is not necessarily required, but rather that the subdivision design should not preclude this for occurring in the future.

69 Appendix 8 of the Application outlines how these transport connections were assessed in detail and then discounted. Further comment is provided by Mr Dirse in his engineering response memorandum (Appendix C).

70 I remain of the view that these connections are precluded due to topography and ecological considerations. Leaving areas vacant on the scheme plan as roads to vest would reduce the amount of developable lots, and the constraints make it highly unlikely that any connection will be made in the future to the South. Safeguarding a connection that is highly unlikely ever to be required would reduce development efficiency without any corresponding planning benefit.

71 As outlined in Appendix 5 to the Application (refer page 70), clause 1 of policy DEV-NG-P4 in the NGDA provides a pathway for deviations from the Structure Plan where certain texts are met:

> DEV-NG-P4 Inappropriate development
>
> Avoid subdivision, use or development that is not in accordance with the Northern Growth Development Area Structure Plan, where these:
>
> 1. Constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan;
> 2. Result in adverse effects on the planned urban built environment of the Development Area, which cannot be appropriately avoided, remedied or mitigated; or
> 3. Do not provide sufficient infrastructure to service its needs and/or constrain, limit or compromise the efficient provision of infrastructure to service the Structure Plan.

72 Considering PCC's comments, and Mr Dirse's comments in Appendix C, I consider the analysis of this clause outlined in Appendix 5 to the Application is still relevant:

> Clause 1 – The aspects of the Proposal that are not consistent with the structure plan do not constrain the intended development and use of the Development Area as set out in the Structure Plan. The Proposal provides adequate connectivity within and outside the Site as outlined in Appendix 8 and is based on ecological and engineering advice. The transport network provides for and in fact enables the development to the north which will rely on the proposed intersection at State Highway 59 for access.
>
> …
>
> Structure Plans provide a high-level guide for consenting processes, where specific site constraint and opportunities are assessed. The introduction to the NGDA (emphasis added) outlines how "The Structure Plan provides indicative access locations, road layouts and bus routes." The site constraints, especially topographical and ecological constraints, have informed the preferred layout of the development.

<u>East-West connection</u>

73 Section 6.4.3.2 of PCC's planning comments states:

> The relevant figure included in Appendix 8 Structure Plan Assessment is reproduced in Figure 8 below.


***Figure 8: Applicant's proposed potential future east-west roading connection***
Source: Figure 7 of *Appendix 8 Structure Plan Assessment*

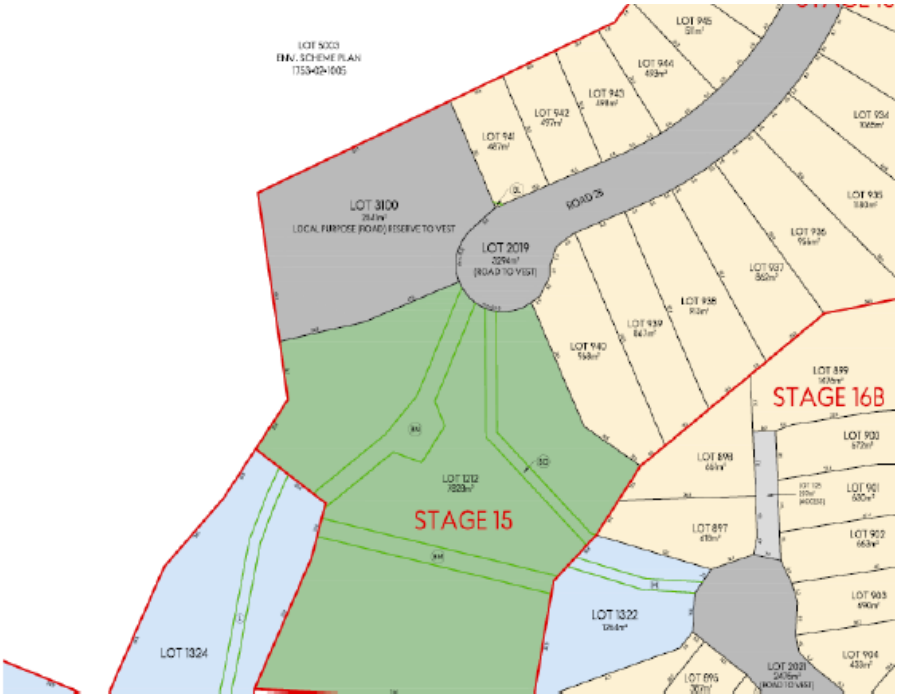
> I consider that the Applicant's assessment does not account for the significant constraints created by the proposed subdivision layout on the ability to achieve the east-west roading connection shown on the Structure Plan in the future. These constraints are created in relation to both the western and the eastern connections of the future road at the termination points of both Road 21 and Road 25.

74 With regard to the eastern connection point shown in Figure 8, I note that the reserve classification was specifically changed in response to PCC feedback[4]:

> As outlined in Appendix 8 to the Substantive Application, there is only one west/east roading connection in the proposed development rather than two shown in the Structure Plan in the area shown in purple in Figure 2 below. There is no proposed roading connection as indicated below in red. The Applicant does not own the land where this indicative road is located. Lot 5003 will be retained by the Mount Welcome Block Trust for continued farming use. If this landowner wished to subdivide in the future, they too would be subject to the Structure Plan provisions in the District Plan.
>
> As shown in Figure 3 below, stage 15 in the scheme plan terminates at a recreation reserve. PCC has raised an issue where the proposed reserve status of this land effectively precludes a future roading connection to lot 5003 as it is very difficult to revoke recreation reserve status once gazetted. The Applicant has therefore updated

[4] Refer Applicant Response to Minute 2 dated 2 July 2026 (paragraph 39-40).

the scheme plan to relabel a portion of this area as road reserve as shown in Figure 3 below. It would be a "paper road" that could be used in the future to provide access to 5003. The Applicant proposes in the interim to construct the reserve for use for recreation until such time it is required for a future road. An updated scheme plan is provided as Appendix E.




75 While the Applicant intends for this land to be used for recreation until it is required for a future road, I acknowledge that a potential future transition of this land from flat grassed land that can be used for recreation to formed road will reduce the quantum of flat recreation land available for residents to use. In this case, the future developers of Lot 5003 would need to provide sufficient parks space in line with PCC parks standards within lot 5003. I consider that a consent notice on the title of Lot 5003 would provide certainty for Council that this would occur. This consent notice should be placed on the title of Lot 5003 requiring future owners of this lot to provide an equivalent area of flat grassed recreation space on Lot 5003 to offset the loss of flat grassed recreation space on Lot 3100 should this area be used to construct a vehicle access to service a future residential subdivision.

76 With regard to the western connection point, section 6.4.3.2 of PCC's planning comments states that:

Western connection point: As shown in Figure 10 below, the area of the western connection point of the future east-west road to Road 21 is proposed to be only five metres wide. If the adjoining land proposed to be vested as recreation reserve were to be included (which, as addressed above, I consider is not practicable), the width remains narrow at less than nine metres. The Porirua District Plan 2025 requires a legal width of at least 15.2 metres for Access roads servicing up to 2,000 AADT.

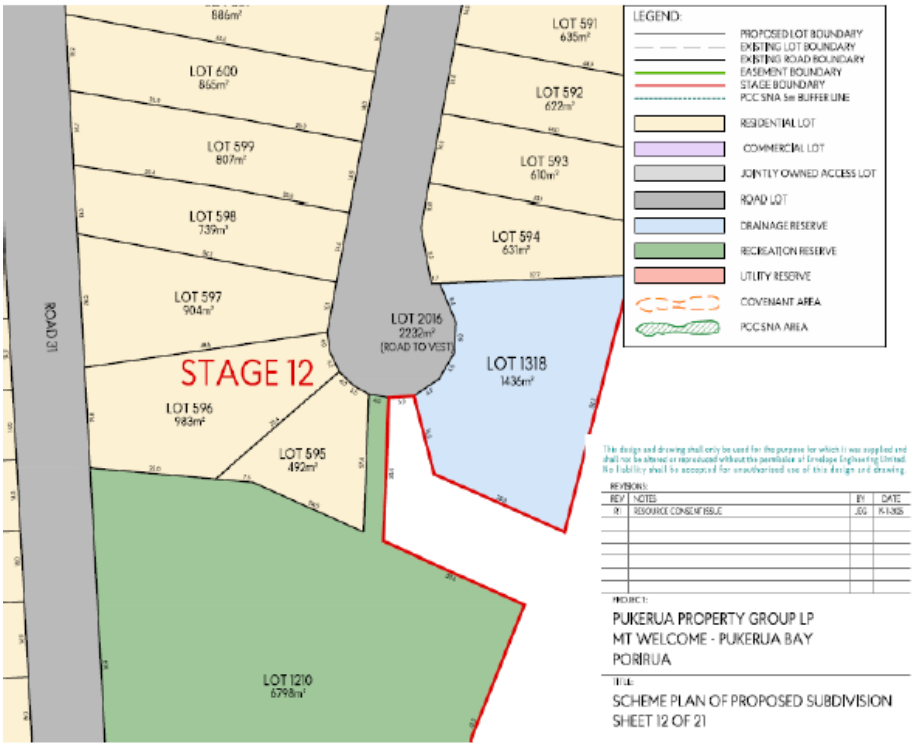



***Figure 10: Area of western connection of future east-west road***
*Source: 1753-02-5001-R2-2026-07-02, Drawing 1025*

77 I agree that this would likely preclude a future road connection in this location, and that this did not occur to me in preparation of the Appendix 8 Structure Plan Assessment. The gap shown in figure 10 between Lot 1318 and Lot 1210 provides for vehicle access to Lot 5003 and is in the same location as an existing metalled farm track.

78 If a future owner/developer of Lot 5003 wanted to put a road in at this location they could, provided they moved the raingarden within 1318 to Lot 5003 so it continues to provide treatment function for the impervious surfaces on the Mt Welcome site. I consider that a consent notice on the title of Lot 5003 would be useful to alert future owners/development to this requirement. I note that the scheme plan is being updated by Envelope to amend the classification of Lot 1318 from local purpose reserve to fee simple,

therefore the reserve classification of the land is no longer a barrier to changing its use from stormwater management to roading.

*Medium density housing*

79 PCC's planning comments make the following statements with regard to the number of units per site:

> **6.4.2 Limits on residential development**
>
> The proposed conditions include a requirement for consent notices to be placed on the residential allotments that restrict development to one dwelling per allotment. This is contrary to the Medium Density Residential Standards (MDRS) incorporated into the district plan through the IPI in accordance with the RMA-EHS. The MDRS, and subsequently the residential zones in the PDP, enable three residential units per site. The proposed consent notice therefore effectively 'down-zones' the area by overriding the MDRS density standards incorporated into the PDP.
>
> …
>
> **6.16.2.2 Limiting future development potential**
>
> The proposed development includes limiting the future development of each residential allotment created through a consent notice to one dwelling and precluding any future subdivision. The ease at which a landowner can develop their land will affect the economic costs for residents. This could result in significant economic costs to future residents and the wider economy as it will preclude efficient use of residential land and the ability for a variety of housing to achieved on the site. These costs could impact the conclusions of the Economic Assessment in terms of the assessment of its contribution to a well-functioning urban environment under Policy 1 of the NPS-UD and section 22 (2)(a)(iii) of the FTAA.

80 The Applicant has proposed that lots be restricted to one unit per lot through a proposed consent notice in order to ensure infrastructure capacity is not exceeded. It is noted that this is supported by Tiaki Wai in their comments (refer section 167). I note that the MDRS enables up to three units per site, but does not mandate three units per site. The Medium Density Residential Chapter does not set a minimum number of residential units per site, in fact it sets a maximum of three units per site (MRZ-S1).

81 Mr Thompson has reviewed PCC's comments and sets out the following in his memorandum:

> Housing diversity is not determined solely by the number of dwellings permitted on each allotment. It also reflects differences in:
>
> - gross and effective lot area,
> - building-platform size,

- dwelling floor area,
- bedroom numbers,
- dwelling design and specification, and
- price.

> Some larger lots contain sloping or constrained land and therefore have substantially smaller effective building areas than their gross lot areas suggest. These sites may be particularly suited to smaller dwellings.
>
> The proposal can conceivably provide dwellings of approximately 125-225 m², ranging from smaller two and three bedroom homes to larger four and five bedroom homes. The 160 m² and 190 m² dwelling areas in the Economic Assessment were indicative averages for market-positioning purposes, not the full range of anticipated dwelling sizes.
>
> The proposal therefore provides meaningful variation within the standalone and compact-standalone market. It should also be considered alongside other developments and locations within Porirua that provide terraces, multi-unit dwellings, smaller homes and higher-priced housing. A well-functioning urban environment does not require every development to provide every housing type.

82 I accept the economic evidence of Mr Thompson that housing diversity remains available, and maintain that the proposal provides for a well-functioning urban environment consistent with the NPS-UD despite the proposed consent notice. I consider that infrastructure capacity constraints justify the restriction on dwellings through the consent notice.

*Ecology effects management*

83 Section 6.3.3.5 states:

> I consider that an operational need or functional need for the location of the intersection within SNA027 or SNA029, such that the location cannot be avoided, has not been established. While a brief options assessment has been provided in the Integrated Transport Assessment provided with the application, in my view, this does not provide sufficient information or analysis to conclude that the location of the proposed intersection within SNA027 or SNA029 cannot be avoided.
>
> Additionally, it appears that the effects management hierarchy in ECO-P2 has not been applied to the area of proposed loss of SNA027 or SNA029. As noted above, the effects management hierarchy under the NPS-IB is required to be applied under the policy statement.

84 The functional need to reclaim the Taupō Stream is outlined in paragraphs 43 onwards above in response to GWRC comments. I consider that the same test is met for clearance of SNA in that there are no practical alternatives to provide suitable site access to a dual lane roundabout, and that the construction of the roundabout requires clearance of SNA

vegetation. I note that Minute 4 outlines how another alternative would result in a much greater clearance of SNA vegetation.

85 The effects management hierarchy was applied to the proposed loss of SNA as outlined in section 6.1 of the Ecological Assessment which was Appendix 15 to the Application.

*Conditions of consent*

86 Section 7 of PCC's planning comments provide some commentary on the Applicant's comments. I have reviewed these comments and provided commentary in Appendix 5 of this memorandum.

*Consistency with RMA Planning Documents*

87 Appendix A of PCC's planning comments details Mr Smeaton's assessment of objectives and policies that he considers are relevant to the proposal. These objectives and policies are contained in the National Policy Statement on Urban Development 2020 (NPS-UD), National Policy Statement for Infrastructure 2025 (NPS-I), National Policy Statement for Natural Hazards Decision-making 2023 (NPS-NH), National Policy Statement for Indigenous Biodiversity 2023 (NPS-IB), Regional Policy Statement for the Wellington Region (RPS) and the Porirua District Plan 2025 (PDP).

88 Appendix 5 sets out my assessment of the proposal against what I consider are the relevant provisions of these documents. Having reviewed comments on the proposal, and with reference to some proposed changes in response to comments, I consider that this assessment stands. Each of these documents, with the exception of the NPS-I, are assessed in Appendix 5 of the Application. 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 this memorandum provides my assessment of the NPS-I and finds that the proposal is consistent with the objective and relevant policies.

**Changes sought to proposed consent conditions**

89 In addition to changes sought by GWRC and PCC in appendices 2 and 5 respectively, there are a number of changes recommended by project technical experts in their memoranda. I have reviewed these changes and provided my views from a planning perspective. In my view, these amendments largely provide additional implementation certainty and respond to matters raised by commenting parties without altering the overall proposal or effects conclusions.

90 The following table provides a list of consent condition changes that I agree with and recommend the Panel adopt:

**Table 1: Summary of changes proposed to district and regional conditions (in addition to appendices 2 and 5)**

| Discipline | Relevant condition | Comment |
|---|---|---|
| Planning | New condition | 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 this Planning Memorandum) |
| | New condition | New condition requiring a consent notice be placed on the title of Lot 5003 requiring future owners of this lot to:<br>• provide an equivalent area of flat grassed recreation space on Lot 5003 to offset the loss of flat grassed recreation space on Lot 3100 should this area be used to construct a vehicle access to service a future residential subdivision; and<br>• provide a raingarden on Lot 5003 to replace the loss of the raingarden on Lot 1318 should this area be used to construct a vehicle access to service a future residential subdivision. |
| Ecology | New condition | New condition requiring an Ecological and Hydrological Management Plan (EHMP) including features as summarised in the recommendation section of Dr Keesing's Ecological Memorandum (refer page 28 in Appendix D) |
| | Amend condition 57 | Amending condition 57 clarifying fish passage is required in the Taupō Stream culvert in addition to retention wetlands B and E (refer page 28 in Appendix D) |
| Landscape | New condition | New condition requiring a SH59 Landscape Mitigation and Reinstatement Plan be prepared with input form NZTA for PCC's information (refer page 6 LVEA Memorandum in Appendix H) |
| Contaminated land | Amended and new conditions | Changes to contaminated land conditions in response to SLR Consulting review on behalf of PCC as outlined in PDP Memorandum (refer section 3.1.4 in Appendix F) |

| | | |
|---|---|---|
| Geotechnical | Amended and deletion of conditions | 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) |

91 I have reviewed the conditions sought by the Department of Conservation in their *Fast-track Approvals Act: Complex freshwater fisheries activity approval report* which was provided under section 51(2)(e). DOC seeks the following conditions of consent:

> i) The Approval Holder must design, construct, operate, monitor, and maintain all instream structures and associated works to provide for effective fish passage, in accordance with the good practice design standards set out in the New Zealand Fish Passage Guidelines.
>
> ii) Prior to the commencement of construction, the Authority Holder must provide to the Director-General of Conservation for certification, a Fish Passage Plan demonstrating how fish passage will be maintained or provided at all culverts, wetland connections, and other structures that may affect the movement of indigenous fish, including during low-flow conditions, and how aquatic habitat connectivity will be retained to the greatest extent practicable.
>
> iii) The Approval Holder must include in the Fish Passage Plan procedures for ongoing monitoring of all installed culverts to assess whether fish passage is being maintained for the target freshwater fish species and life stages. Monitoring must be carried out after installation, after significant fresh or flood events, and at regular intervals for the operational life of the culverts. If monitoring shows that fish passage is not being maintained, the Approval Holder must investigate the cause and implement remedial actions as soon as practicable.
>
> iv) The Fish Passage Plan must also include biosecurity controls to prevent the spread of freshwater pest species. These controls must require all staff and contractors carrying out instream works, fish salvage, monitoring, or maintenance to follow the Ministry for Primary Industries' Check Clean Dry method, including gold clam-specific cleaning and drying requirements. The controls must apply to all equipment, machinery, footwear, nets, boats, pumps, hoses, and other gear that may come into contact with freshwater.

92 I consider that these conditions are unnecessary as:

a. These conditions duplicate regional conditions 57 and 58 proposed by applicant which I consider address fish passage where fish are present in waterways;

b. Fish passage will be adequately regulated by the regional council which has a clear jurisdiction under national standards and regional plans. I do not see any benefit in another regulator certifying plans, in fact it would add additional cost and potentially delays to the development; and

c. The conditions are seeking that the applicant provide for fish passage in waterways where there are currently no fish present in waterways. This is unnecessary from an

ecological perspective and would add significant cost to the provision of stormwater infrastructure.

93 For clarity, the Applicant proposes conditions not imposed on the complex freshwater fisheries. I consider that the effects of the activities authorised by the complex freshwater fisheries approvals are managed by the regional consent conditions, in particular conditions 57 – 62. Having no complex freshwater fisheries approval conditions avoids duplication while still managing effects.

**Conclusion**

94 The time taken by all parties to submit the written comments received on the proposal are appreciated and responses to these comments as outlined in Appendix A.

95 Taking all of the above into account, I remain confident that the development as proposed meets the purpose of the FTAA.

**Planning Response Memorandum - Appendices Index**

Appendix 1: Assessment of additional consents identified by GWRC
Appendix 2: Assessment of changes to conditions sought by GWRC
Appendix 3: Assessment of rules and standards identified by PCC
Appendix 4: Assessment of the National Policy Statement for Infrastructure
Appendix 5: Assessment of changes to conditions sought by PCC
Appendix 6: Commentary on Panel's Review of Complex Freshwater Fisheries Activities conditions
Appendix 7: Commentary on Panel's Review of Wildlife Authority conditions
Appendix 8: Commentary on Panel's Review of Archaeological Authority conditions

# Appendix 1: Assessment of additional consents identified by GWRC

Table 3 of the GWRC's Section 53 comments details the regional resource consents that they consider are required to authorise the activities proposed by the substantive application. While there is agreement between GWRC and the applicant over the majority of the resource consents, Table 3 highlights four activities which they consider consents are required for but have not been explicitly sought through the substantive application. The activities are:

- The establishment of a new dam that is fixed in, on, or under the bed of a river including any associated disturbance of the bed, deposition of the bed, diversion of water, damming of water, discharge of sediment to water, and damming of water outside the bed by a dam structure;
- Damming and diversion of water associated with the establishment of a new dam;
- Damming and diversion of water within, or within 100 m, of a natural inland wetland, that will change the water level range or hydrological function of the wetland; and
- The use of land for the creation of new impervious surfaces and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body, natural inland wetland, or coastal water.

The purpose of this memo is to assess those matters, and, if necessary, include them as part of the application process.

The identification of these additional consents does not alter the physical scope of the proposal or identify adverse effects that have not already been assessed.

The following table follows the format of Table 3 of the GWRC's Section 53 comments, with an additional column detailing the applicant's position on each matter.

| **Activity** | **Relevant rule or regulation** | **Activity Status** | **Resource consents required** | **GWRC comments** | **Applicant response** |
|---|---|---|---|---|---|
| The establishment of a new dam that is fixed in, on, or under the bed of a river including any associated disturbance of the bed, deposition of the bed, diversion of water, damming of water, discharge of sediment to water, and | NRP R145 | Discretionary | Land use consent (s13), water permit (s14), and discharge permit (s15) | Applies to the establishment of dams that form Retention Wetlands B and E, which are located on rivers. The dams do not comply with permitted activity conditions under Rule R127 because they have a maximum water level that exceeds 3 m (measured at the natural ground | Agree that the rules apply. The dam heights from the toe to the spillway for both Retention Wetlands B and E both exceed 3m, and the upstream catchment for Retention Wetland E exceeds 20ha. As such it is **agreed that resource consents are required under** |
| | NRP R147 | Discretionary | | | |

| | | | | | |
|---|---|---|---|---|---|
| damming of water outside the bed by a dam structure | | | | level at the downstream toe of the dam structure) (condition (k)). The dam that forms Retention Wetland E also has an upstream catchment that exceeds 20 ha(condition (l)) | **NRP R145 and 147 as a Discretionary Activity**. The relevant effects and objectives and policies are addressed in the substantive application. |
| Damming and diversion of water associated with the establishment of a new dam | NRP R151 | Discretionary | Water permit (s14) | Applies to the dams that form Retention Wetlands A, C, and D, which are not located on rivers. | Agree that the rule is applicable to Retention Wetlands A, C, and D, which are not located on rivers. As such it is **agreed that resource consent is required under NRP R151 as a Discretionary Activity**. The relevant effects and objectives and policies are addressed in the substantive application. |
| Damming and diversion of water within, or within 100 m, of a natural inland wetland, that will change the water level range or hydrological function of the wetland | NES-F Reg. 45C<br>NRP R118 | Restricted discretionary<br>Non-complying | Water permit (s14) | Applies to the damming and diversion of water associated with the formation of Retention Wetlands A, B, C, and E, as this will flood existing natural inland wetlands as identified in Appendix 30-41 (Overall Ecological Areas) in the Substantive Application. | Agree that the regulation and rule apply as the damming and diversion of water associated with the formation of Retention Wetland A, B, C and E will flood existing natural inland wetlands. As such it is **agreed that resource consent is required under NES-F Reg. 45C as a Restricted Discretionary Activity and NRP R118 as a Non-Complying Activity**. The relevant effects and objectives and policies are addressed in the |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | substantive application. |
| The use of land for the creation of new impervious surfaces and the associated discharge of stormwater into water, or onto or into land where it may enter a surface water body, natural inland wetland, or coastal water | NES-F Reg. 45C | Restricted discretionary | Land use consent (s13), and discharge permit (s15) | Applies to the creation of all new impervious surfaces, and the associated discharge of stormwater, as described in the substantive application. This includes the creation of new and redevelopment of existing impervious surfaces for the construction of the SH59 roundabout, and the associated discharge of stormwater. Applicant has sought a land use consent for impervious surfaces but has not sought a discharge permit for stormwater. Greater Wellington considers both a land use consent and a discharge permit are required. | Agree that the regulation and rules apply for the discharges associated with the proposed impervious surfaces. As such it is **agreed that resource consent is required under NES-F Reg. 45C and NR R50 as a Restricted Discretionary Activity and NRP-PC1 P.R10 as a Discretionary Activity**. The relevant effects and objectives and policies are addressed in the substantive application. |
| | NRP R50 | Restricted discretionary | | | |
| | NRP-PC1 P.R10 | Discretionary | | | |

# Appendix 2: Assessment of changes to conditions sought by GWRC

| GWRC preferred condition | Applicant response |
|---|---|
| *Resource consent documents*<br>1. The location, design, implementation and operation of the works authorised by these consents must be undertaken in general accordance with the information and plans contained within the application lodged with the Environmental Protection Authority (EPA) on 1 April 2026:<br>a) [List all documents]<br>And the following additional information:<br>b) [List all documents, including the date of the document]<br>Where there is a contradiction or inconsistency between the application and further information provided by the applicant, the most recent information applies. In the event that any of the provisions of these documents conflict with the requirements of these conditions, the conditions of consent will prevail.<br>*Advice note: Any change from the location, design, implementation and/or operation of the works may require a new resource consent, or a change of consent conditions pursuant to Section 127 of the Resource Management Act 1991.* | Similar to General Condition 1 which I prefer. |
| 2. The Consent Holder must ensure that a copy of these consents and all documents and plans referred to in these conditions are:<br>a) Provided to each operator or contractor undertaking the works authorised by this consent, prior to works commencing; and<br>b) Kept on site at all times during the construction period and presented to any Warranted Officer upon request.<br>*Advice note: It is recommended that the contractors be verbally briefed on the requirements of the conditions of this consent prior to works commencing.* | Similar to conditions 7 and 9 which I prefer. |
| *Review of Conditons*<br>3. The relevant consent authority may review any or all conditions of this consent by giving notice of its intention to do so pursuant to Section 128 of the Resource Management Act 1991, within one month of each anniversary of the commencement of this consent, for any of the following reasons:<br>*a) To review the adequacy of any plan and/or monitoring requirements, and if necessary, amend these requirements outlined in this consent*<br>b) To deal with any adverse effects on the environment that may arise from the exercise of this consent; and which are appropriate to deal with at a later stage | Similar to Condition 8 which I prefer. |

| | |
|---|---|
| c) To require the implementation of Best Practicable Options, in respect to new methodologies for the undertaking of the works to avoid, remedy or mitigate any significant adverse effect on the environment arising from the works<br>d) To enable consistency with any relevant plans, proposed plans, or any National Environmental Standards or regulations.<br><br>The review of conditions may include the deletion or amendment of conditions of this consent; and the addition of such new conditions as are shown to be necessary to avoid, remedy or mitigate any significant adverse effects on the environment. | |
| *Management plans and detailed designs*<br>4. The following management plans and detailed designs must be submitted to the Manager for certification that the management plans and detailed designs are in accordance with the relevant conditions of the consent to which each relates:<br><br>*Earthworks management plans*<br>a) Earthworks Construction Management Plan (ECMP) required by Condition 19;<br>b) Chemical Treatment Management Plan (CTMP) required by Condition 20;<br>c) Stage-Specific Erosion and Sediment Control Plan (SSESCP) required by Condition 22;<br><br>*Contaminated land management plans*<br>d) Contaminated Soil Management Plan (CSMP) required by Condition<br><br>*Rivers and natural inland wetlands management plans and detailed designs*<br>e) Eco-Hydrological Management, Offsetting, and Monitoring Plan (EHMP) required by Condition 45;<br>f) Stream Works Management Plan (SWMP) required by Condition 46;<br>g) Culvert Monitoring and Maintenance Plan (CMMP) required by Condition 47;<br>h) Detailed design of in-stream structures required by Condition 49;<br><br>*Stormwater detailed design and management plans*<br>i) Stormwater Detailed Design (SDD) required by Condition 82;<br>j) Stormwater Operation and Maintenance Plan (SOMP) required by Condition 85. | Similar to Applicant Regional Conditions 1–10 and associated management-plan conditions which I prefer, noting that I agree the EHMP condition and should be added to condition 10 (see commentary GWRC condition 45 below. |
| 5. Management plans and detailed designs, including any amendments to management plans or detailed designs, must be prepared by a SQEP. | Similar to Condition 1, I prefer GWRC wording as it relates to designs as well as management plans. |
| 6. Works to which a management plan or detailed design relate must not commence until the Consent Holder has received written notice that | Similar to conditions 4 and 7, I prefer GWRC wording as it |

| | |
|---|---|
| the management plan or detailed design has been certified by the Manager.<br>7. The Consent Holder must implement the certified management plans and detailed designs, and all works must be carried out in accordance with the certified management plans and detailed designs. | relates to designs as well as management plans. |
| 8. The Consent Holder must ensure that copies of all certified management plans and detailed designs are available on site and are provided to any Warranted Officer on request. | Similar to Condition 9, I prefer GWRC wording as it relates to designs as well as management plans. |
| *Amendments to management plans*<br>9. The Consent Holder may make amendments to any certified management plan or detailed design without the need for re-certification where the amendment is an administrative change, such as a change in contract details or nominated personnel.<br><br>The Consent Holder must submit, in writing, the amendments made under this condition to the Manager within 10 working days of making the amendment. If the Consent Holder is notified by the Manager that the amendment is not an administrative amendment, then the amendment must be treated as a material amendment submitted under Condition 10. | Similar to Condition 8 which I prefer. |
| 10. Except as provided for by Condition 9, the Consent Holder may make amendments to the certified management plans or detailed designs, provided that:<br>a) The amendment must be submitted to the Manager for certification that the amended management plan or detailed design is in accordance with the relevant conditions of consent;<br>b) For an amendment to a management plan, prior to submitting the amendment to the Manager, the Consent Holder complies with Conditions 11 and 12 (engagement with mana whenua on management plans) in relation to the amendment;<br>c) Any works subject to the amendment must not commence until the Consent Holder has received notice that the amendment has been certified by the Manager; and<br>d) The Consent Holder must implement the certified amendment, and all works must be carried out in accordance with the certified amendment. | Similar to Condition 8 and Condition 10 for mana whenua engagement, both of which I prefer. |
| *Mana whenua*<br>*Engagement with mana whenua on management plans*<br>11. **At least 10 working days prior to submitting any management plan to the Manager for certification, the Consent Holder must provide a draft version of the management plan to Te Rūnanga o Toa Rangatira and invite them to comment on the plan.** | Similar to condition 10 which I prefer. |
| 12. The Consent Holder must include a record of any comments received under Condition 11, and the Consent Holder's response to these comments, in the management plan submitted for certification.<br><br>*Advice note: The purpose of inviting Te Rūnanga o Toa Rangatira to comment on the management plan is to provide the opportunity to work* | Similar to condition 10, which I prefer as it is more specific. |

| | |
|---|---|
| *in partnership, allowing for mana whenua input on the management of works that are the subject of these consents.*<br><br>*Advice note: Should Te Rūnanga o Toa Rangatira confirm they do not wish to provide comment on a management plan, the Consent Holder will have complied with these conditions.* | |
| Tīmatanga ceremony<br><br>13. The Consent Holder must invite, with a minimum of 15 working days' notice prior to the commencement of any works authorised by these consents, Te Rūnanga o Toa Rangatira to undertake a tīmatanga (karakia) ceremony in a location agreed between Te Rūnanga o Toa Rangatira and the Consent Holder.<br><br>*Advice note: In the case that a representative of Te Rūnanga o Toa Rangatira does not attend, or no response to the invitation is received after 15 working days, the Consent Holder will have complied with this condition, provided the invitation requirement is met.*<br><br>*Advice note: It is expected that the tīmatanga ceremony will involve a karakia by kaumatua facilitated by the Te Rūnanga o Toa Rangatira and will occur at the beginning of the project before any works occur on the site. The tīmatanga would finish with kai (morning tea). It is expected that the Consent Holder will meet the cost of the tīmatanga ceremony as agreed with Te Rūnanga o Toa Rangatira.* | Similar to condition 34, which I prefer as it is supported by Ngāti Toa. |
| Cultural induction<br><br>14. At least 15 working days prior to the commencement of any works authorised by these consents, and on further occasions as may be agreed by the Consent Holder and Te Rūnanga o Toa Rangatira, the Consent Holder must invite Te Rūnanga o Toa Rangatira to provide a cultural induction to the site and all relevant contractors to be involved with the works authorised by these consents. | Similar to condition 35, which I prefer as it is supported by Ngāti Toa. |
| *Accidental discovery protocol*<br><br>15. If koiwi, taonga, wāhi tapu or other archaeological material is discovered in any area during the works, the Consent Holder must immediately cease all work and within 12 hours notify the Manager, Te Rūnanga o Toa Rangatira, and Heritage New Zealand Pouhere Taonga in writing. If human remains are found, the New Zealand Police must be notified immediately. The Consent Holder must allow the above parties to inspect the site and, in consultation with them, identify what needs to occur before work can resume.<br><br>Notification must be emailed to:<br>a) Te Rūnanga o Toa Rangatira Inc: resource.consents@ngatitoa.iwi.nz<br>b) Wellington Regional Council: notifications@gw.govt.nz<br>c) Porirua City Council: compliance.monitoring@poriruacity.govt.nz<br>d) Heritage New Zealand Pouhere Taonga: information@heritage.org.nz | I consider this condition is unnecessary as it duplicates Archaeological Authority requirements. An advice note could be useful to alert users to the Archaeological Authority. |

| | |
|---|---|
| Heritage New Zealand Pouhere Taonga must also be contacted by phone on 04 472 4341 (National Office). | |
| 16. If works cease under Condition 15, no works may resume until the Consent Holder has provided to the Manager written notification that consultation with the parties identified in Condition 15 has been undertaken.<br><br>*Advice note: Evidence of archaeological material may include burnt stones, charcoal, rubbish heaps, shell, bone, old building foundations, artefacts and human burials. Any archaeological work must be undertaken in a manner that is consistent with any tikanga requested by Te Rūnanga o Toa Rangatira while also complying the conditions of these consents and any archaeological authority.* | I consider this condition is unnecessary as it duplicates Archaeological Authority requirements. An advice note could be useful to alert users to the Archaeological Authority. |
| *Complaints*<br>17. At all times from the commencement of works authorised by these consents until the works are complete and the site is stabilised, the Consent Holder must maintain a permanent record of any complaints received alleging adverse effects from, or related to, the exercise of this consent. The record must include:<br><br>a) the name and address of the complainant;<br>b) the nature of the complaint;<br>c) location, date and time of the complaint and of the alleged event;<br>d) weather conditions at the time of the complaint (as far as practicable), and including wind direction and approximate wind speed if the complaint relates to air quality;<br>e) the outcome of the Consent Holders investigation into the complaint;<br>f) measures taken to respond to the complaint; and<br>g) any other activities occurring in the area at the time of the complaint.<br><br>The Consent Holder must also keep a record of any remedial actions undertaken. This record must be maintained on site and must be made available to the Manager, upon request. The Consent Holder must notify the Manager of any such complaints as soon as practicable and within 24 hours after the complaint is received by the Consent Holder. | I consider this condition unnecessary as it duplicates GWRC's environmental monitoring role. It is not reasonable for the Consent Holder to investigate every catchment complaint where effects may arise from other existing, consented, or future developments, background conditions, or weather events. Attribution of wider catchment effects is properly a GWRC compliance function. The Consent Holder should respond to complaints clearly linked to its own works, but should not be required to investigate unrelated or uncertain effects. |
| ## Earthworks conditions<br>*Discharge quality*<br>18. Discharges to any surface water body must not give rise to any of the following beyond the zone of reasonable mixing:<br>a) The production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;<br>b) Any conspicuous change in the colour or visual clarity;<br>c) A decrease in water clarity of more than 30%;<br>d) Any emission of objectionable odour;<br>e) The rendering of freshwater to be unsuitable for consumption by farm animals;<br>f) Any significant adverse effects on aquatic life. | I consider that this condition is unnecessary as it duplicates existing permitted activity controls in the NRP. |

| | |
|---|---|
| **Earthworks management plans**<br><br>Earthworks Construction Management Plan (ECMP)<br><br>19. At least 20 working days prior to the commencement of earthworks, the Consent Holder must submit an Earthworks Construction Management Plan (ECMP) to the Manager for certification.<br><br>The objective of the ECMP is to set out the overall management principles, practices, monitoring, maintenance, and reporting that will be implemented to manage the actual and potential adverse effects of erosion, sediment, and dust discharges as a result of earthworks.<br><br>The ECMP must be prepared in accordance with the ESC Guide for the Wellington Region, and must include the following as a minimum:<br>a) Description of the overarching erosion, sediment, and dust control principles, practices, and performance criteria that will be implemented;<br>b) Description of the staging of earthworks, including:<br>i. Area and extent of each stage;<br>ii. Location of each stage;<br>iii. Sequencing of stages;<br>iv. General outline of the construction programme for each stage.<br>c) Identification of sensitive receiving environments at, adjacent to, or downstream from the earthworks, including streams and natural inland wetlands, and how earthworks will be effectively separated from these environments;<br>d) Description the methods of progressive stabilisation that will be implemented throughout all stages of earthworks, and that are suitable for the soil types, times of year, and climatic conditions in which they must be implemented;<br>e) Description of how any recommendations made in the Geotechnical Investigation report that relate to surface water management and erosion and sediment control will be implemented;<br>f) Description of how the staging of earthworks will be coordinated with the staging of stormwater discharges and implementation of ecological mitigation, offsetting, or compensation required by other conditions of consent;<br>g) Description of how any sediment treatment device monitoring required by the conditions (including device monitoring and continuous baseline water quality monitoring) will be undertaken;<br>h) Information on how the continuous water quality monitoring required by Condition 32 will be undertaken, including:<br>i. Confirmation of the methods for undertaking continuous water quality monitoring;<br>ii. Establishment of baseline sediment discharge levels;<br>iii. Appropriate trigger levels for a change in water quality to determine when a monitoring response is required, to achieve the purpose of the monitoring set out in Condition 32;<br>iv. Regular reporting of monitoring results. | Similar to conditions 11-13, noting that stage-specific ECMPs are now proposed, I prefer existing wording which is more concise. |

| | |
|---|---|
| i) Description of how audits, inspections, and maintenance of erosion, sediment, and dust control measures will be undertaken.<br>j) Heavy rainfall event and incident response procedures. | |
| Chemical Treatment Management Plan (CTMP)<br>20. At least 20 working days prior to the commencement of earthworks, the Consent Holder must submit a Chemical Treatment Management Plan (CTMP) to the Manager for certification.<br><br>The objective of the CTMP is to demonstrate how chemical treatment will be used, monitored and managed appropriately so that discharges from sediment treatment devices meet the discharge quality conditions of this consent.<br><br>The CTMP must be in accordance with the ESC Guide for the Wellington Region and must include the following as a minimum:<br>a) Specific design details of the chemical treatment dosing system, for each sediment treatment device;<br>b) Monitoring, maintenance (including post-storm) and contingency programme (including a record sheet);<br>c) Details of optimum dosage for each sediment treatment device, including assumptions and an analysis of whether the dosage rates will achieve the NTU and pH limits set out in Condition 31;<br>d) Results of chemical treatment trials, including identification of locations for soil sampling that ensure that soil is sampled from within the catchment area of each treatment device;<br>e) A spill contingency plan; and<br>f) Details of the person or bodies that are responsible for the operation and maintenance of the chemical treatment system and the organisational structure that will support this system. | Similar to conditions 23 to 28, which I prefer. |
| 21. The consent holder must review the CTMP prior to commencing each stage of earthworks, or at minimum, on a yearly basis. Reviews must reference monitoring data and/or further bench testing results to determine the effectiveness of the CTMP and whether it needs to be amended to ensure on-going optimal performance. The findings of each review shall be submitted to the Manager upon request. If an amendment is required to the CTMP as a result of the review, this shall be submitted to the Manager as for certification under Condition 10. | Similar to conditions 23 to 28, which I prefer. |
| Stage Specific Erosion and Sediment Control Plan (SSESCP)<br>22. At least 20 working days prior to the commencement of each stage of earthworks, the Consent Holder must submit to the Manager for certification a Stage-specific Erosion and Sediment Control Plan (SSESCP) for that stage.<br><br>The objective of the SSESCP is to:<br>a) Provide detailed, location specific erosion, sediment, and dust control measures relevant to the stage of works; and<br>b) Ensure measures are implemented and certified so as to prevent any increase in sediment-laden runoff or dust from entering downstream waterways and wetlands, or properties beyond the site, ensuring the maintenance of water and air quality and ecological health during construction activities. | Similar to conditions 14 to 16 which I prefer as they are more concise. |

Each SSESCP must be in accordance with the ECMP and the ESC Guide for the Wellington Region and must include the following as a minimum:

c) Responsibilities and contact details of all parties responsible for the construction, inspection and maintenance of erosion, sediment, and dust controls;
d) Expected commencement date and programme of works for that stage;
e) Description of the earthworks and/or vegetation clearance to be managed by the SSESCP;
f) Identification of any specific erosion and sediment control risk, the nature of the risk, the exposure of works to heavy rainfall and/or flood flows and any specific actions to manage this risk;
g) A plan or a series of plans showing:
    i. Catchment boundaries and contours;
    ii. Areas to be disturbed;
    iii. Areas that will not be disturbed;
    iv. Cut and fill areas;
    v. Soil stockpile areas;
    vi. Fill disposal sites;
    vii. Location of erosion and sediment control devices and measures;
    viii. All discharge points;
    ix. Location of all streams and wetlands;
    x. Any exclusion/no go areas;
h) The specific erosion, sediment and dust control measures that will be applied to that stage of earthworks, including the location(s), dimension(s), capacity, calculations and design drawings;
i) Details of site access and stabilised construction entranceways;
j) Evidence demonstrating all erosion, sediment and dust controls are designed in accordance with the ESC Guide for the Wellington Region;
k) If infiltration is proposed as part of the design or implementation of any erosion and sediment control measure, verification of soakage rates and how these have been used to inform the design of those measures;
l) Specific locations of all points of discharge to the receiving environment;
m) Details and methodologies for undertaking monitoring of sediment treatment devices, including the location of upstream and downstream monitoring points;
n) Details of dust management measures necessary to prevent the discharge of dust beyond the boundary of the properties within the stage;
o) Methods of progressive stabilisation that will be used;
p) Details describing the process for regular auditing, inspection and maintenance of all erosion, sediment and dust control measures;
q) Where works in that stage are located near wetlands:
    i. Methods for delineating wetlands with flags, or similar, to ensure contractors are aware of the works boundaries
    ii. Methods for excluding works from wetlands (except where wetlands are authorised to be reclaimed);
    iii. Any specific erosion and sediment controls for earthworks within or adjacent to wetlands.

| | |
|---|---|
| r) Where works are near streams, specific measures to manage these works, including buffer zones and erosion and sediment controls consistent with the certified stream works management plan;<br>s) Where works are located adjacent to or upstream from to any stormwater management device, methods to avoid discharges from earthworks to any stormwater management device;<br>t) Any other relevant site or other information required to demonstrate will be in accordance with the ECMP, the ESC Guide for the Wellington Region, and consent conditions. | |
| *General earthworks*<br><br>Staging and progressive stabilisation<br><br>23. The maximum area of any stage of earthworks must not exceed the stage areas identified in Table 1 of the Draft Earthworks and Construction Management Plan dated [insert date] [Note to Panel: as set out in Greater Wellington's Earthworks comments, there are errors in this table that should be corrected before the document is referred to in conditions]. | Condition unnecessary as it duplicates SSESCP conditions 14 to 16 and General Condition 1.<br><br>The table errors have been considered by Envelope in their Engineering Memorandum (Appendix C) and I defer to them on this matter. |
| 24. Earthworks must not commence in any subsequent stage until earthworks have been completed in the preceding stage and the land within that stage is stabilised. | Condition unnecessary as it duplicates SSESCP stabilisation requirements (conditions 14 and 15) |
| 25. The Consent Holder must progressively stabilise all land where earthworks have been undertaken in accordance with the ECMP and SSESCP. Upon completion of works authorised by this consent, the entire site must be stabilised. | Condition unnecessary as it duplicates SSESCP stabilisation requirements (conditions 14 and 15) |
| Pre-construction site meeting<br><br>26. The Consent Holder must arrange and conduct a pre-construction site meeting prior to each stage of earthworks commencing and invite, with a minimum of 5 working days' notice, the Manager.<br><br>The pre-construction meeting must not occur before the following management plans have been certified by the Manager:<br>a) ECMP;<br>b) ECMP;<br>c) SSESCP for the relevant stage;<br>d) If relevant to the stage of earthworks:<br>i. Contaminated Site Management Plan (CSMP);<br>ii. Remediation Action Plan (RAP);<br>iii. Stream Works Management Plan (SWMP);<br>iv. Eco-Hydrological Management Plan (EHMP).<br><br>*Advice note: In the case that any of the invited parties, other than the representative of the Consent Holder, does not attend this meeting, the Consent Holder will have complied with this condition, provided the invitation requirement is met.* | Similar to Conditions 36–38 which I prefer as they are more specific about attendees and relevant reports, noting mechanical update required to add new EHMP. |

| | |
|---|---|
| As-builts<br>27. At least 2 working days prior to the commencement of earthworks in each stage, the Consent Holder must provide the Manager with 'as-built' plans and details, which have been prepared and signed by a SQEP, confirming that the erosion and sediment controls have been constructed in accordance with the SSESCP for that stage.<br><br>*Advice Note: For sediment retention ponds, as-built check sheets are available on the Wellington Regional Council's website at the following link: gw.govt.nz/earthworks.*<br>*For other ESC measures, as-built information for the purpose of this condition may include:*<br>• *A signed copy of the certified SSESCP with a statement that the ESC measure has been constructed in accordance with the certified SSESCP. This statement may include the relevant construction quality check sheet for the ESC measure from Appendix C1.0 of the ESC Guide for the Wellington Region; and*<br>• *Photographs of each control measure as constructed.* | Same as condition 17. |
| Site Audits<br>28. During each stage of earthworks authorised by this consent and until each stage of earthworks has been permanently stabilised, the Consent Holder must have the stage and erosion and sediment control measures audited by a SQEP. The audits must identify whether all erosion and sediment controls have been installed, operated and maintained in accordance with the certified SSESCP, and identify any steps or measures required to ensure compliance is achieved.<br><br>The audits required by this condition must be undertaken:<br>a) On a minimum of a weekly basis (unless a reduced frequency is agreed in writing by the Manager in advance); and<br>b) As soon as practicable after a heavy rainfall event.<br><br>Each audit must be recorded in writing and submitted to the Manager within 2 working days of the audit being undertaken.<br><br>*Advice note: Any site audits carried out by Wellington Regional Council or its contractors do not constitute the audits required by this condition.* | Similar to condition 18 which I prefer as it is more specific. |
| Chemical Treatment Monitoring and Maintenance Reports<br>29. If chemical treatment is used in any stage of earthworks, the Consent Holder must submit a chemical treatment monitoring report in accordance with the CTMP to the Manager.<br><br>These reports must be submitted each week while chemical treatment is being undertaken and include:<br>a) Dates and results of operation and maintenance undertaken by a SQEP;<br>b) Chemical testing undertaken (record sheets);<br>c) Any corrective measures taken where a device has been found to not be functioning effectively. | Similar to condition 29 which I prefer. |

### Sediment treatment device monitoring

30. For each sediment treatment device, the Consent Holder must sample and record the parameters set out in Table 1 as soon as practicable in the following instances as a minimum:
    a) following a heavy rainfall event;
    b) following the commencement of the discharge from any sediment treatment device, and daily for the duration of the discharge.

    The sampling and recording required by this condition must be undertaken in accordance with the methodology set out in the ECMP and SSESCP.

    The Consent Holder must submit all monitoring data and information collected under this condition to the Manager within 5 working days of the date the sampling is undertaken, unless an alternative timeframe is approved by the Manager.

    This condition will cease to apply to any sediment treatment device where the catchment for that device has been completely stabilised, and the device has been decommissioned in accordance with Condition 38.

    **Table 1**: sampling parameters for sediment treatment devices

| Parameter | Outflow | Monitoring locations | |
|---|---|---|---|
| | | Downstream (at the location identified in SSESCP) | Immediately upstream of the point of discharge from the sediment treatment device |
| pH | ✓ | ✓ | ✓ |
| NTU | ✓ | ✓ | ✓ |

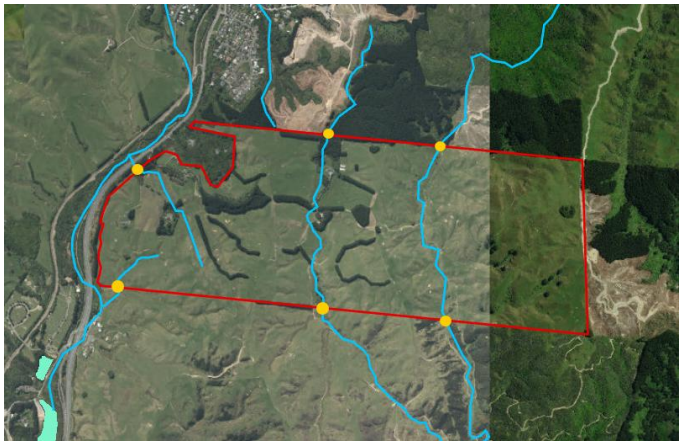
Similar to Condition 19 which I prefer.

### Monitoring response

31. If any of the following events occur:
    a) The monitoring required under Condition 30 confirms that:
        i. At the outflow of the device, the NTU value is 170 NTU or greater; or
        ii. The pH at the outflow of the device is at or below 5.5 or above 8.5; or
    b) There is a failure or malfunction of any erosion and sediment control measure, or any unauthorised discharge of contaminants, that has resulted in a discharge either directly or via land to a surface water body or stormwater network;

    the Consent Holder must:
    c) Immediately notify the Manager of the incident;
    d) Immediately investigate the cause of the incident and implement changes required to prevent a reoccurrence;
    e) Take photographs of the discharge point, and upstream and downstream of the discharge point;
    f) As soon as practicable, repair, replace, or reinstate the erosion and sediment control measure in accordance with the CEMP and SSESCP;

Similar to Condition 19 which I prefer.

| | |
|---|---|
| g) Within 5 working days, a provide a written report to the Manager including the following information:<br>i. Date and time of the event;<br>ii. Weather conditions prior to and during the event;<br>iii. Photographs required by (e);<br>iv. The findings of any investigations undertaken;<br>v. A description of the cause of the incident;<br>vi. A description of any response actions undertaken;<br>vii. A description of any amendments required to the ECMP or SSESCP to avoid the event occurring again in the future.<br><br>If amendments are required to the ECMP or SSESCP, these must be submitted as amendments under Condition 10. | |
| Continuous water quality monitoring<br><br>32. The Consent Holder must undertake continuous in-stream water quality monitoring at the locations identified in Figure 1 until all earthworks authorised by this consent have ceased and the site has been stabilised.<br><br>The purpose of the monitoring is to demonstrate that there will be no increase in the discharge of sediment from the site during the works authorised by this consent, compared to before the commencement of the works authorised by this consent.<br><br>  <br>**Figure 1:** continuous in-stream water quality monitoring locations shown in yellow. Site boundary shown in red. Indicative location of rivers shown in blue. | I agree with this condition in principle, however I disagree the two eastern most monitoring sites are required as minimal works are proposed in the Kakaho East catchment. |
| 33. If the results of monitoring required by Condition 32 exceed the trigger level set in the ECMP under Condition 19.h), then the Consent Holder must:<br>a) Investigate the cause of the exceedance of the trigger level;<br>b) If the activities undertaken by the Consent Holder have caused or contributed to the exceedance, identify any changes in the management of the activities undertaken by the Consent Holder that are necessary to avoid an exceedance of the trigger level in future;<br>c) Submit a report to the Manager within 10 working days of the exceedance occurring that addresses the matters in a) and b) above. | Closest equivalent is Condition 20, I agree in principle with GWRC approach. |

| | |
|---|---|
| 34. If the report required by Condition 33.c) identifies changes in the management of activities necessary under Condition 33.b), then those changes must be submitted as amendments to the relevant management plan under Condition 10 at the same time as the report is submitted under Condition 33.c). | Closest equivalent is Condition 20, I agree in principle with GWRC approach. |
| Dust control<br>35. Earthworks must not cause noxious, dangerous, offensive, or objectionable discharge or deposition of dust beyond the boundary of each earthworks stage. | Similar to Regional Condition 13(e) and District Condition 62 both of which I prefer. |
| Cuts and fill<br>36. All fill material used on site must be restricted to natural material such as clay, soil and rock, and inert material such as concrete and brick, which, when buried, will have no adverse effect on people or the environment.<br><br>*Advice note: Rule R82 (Discharges from contaminated land) of the Operative Natural Resources Plan 2023 will apply to any imported or insitu material worked on the site. If the activity does not meet the permitted standards under Rule R82, consent will be required under Rule R83 (Investigation of, or discharges from contaminated land – discretionary activity).* | No direct Applicant equivalent identified, however matter is addressed through SSESCP/CSMP controls depending on source of fill. |
| 37. All permanent or final cut and fill surfaces must be completed and stabilised to prevent erosion or instability. Any erosion of soil, including failure of cut and fill batters, that is attributable to the works must be contained, remedied and/or mitigated by the Consent Holder. | Condition unnecessary as it duplicates SSESCP stabilisation requirements (conditions 14 and 15) |
| Decommissioning<br>38. The Consent Holder must not remove or decommission any erosion or sediment control measure until the contributing catchment for the erosion or sediment control measure is completely stabilised. Written notice must be provided to the Manager prior to the removal or decommissioning of each erosion or sediment control measure. Written notice must include evidence of stabilisation and be signed off by SQEP confirming that the contributing catchment for the erosion or sediment control measure is completely stabilised. | Same as Condition 20. |
| *Winter earthworks*<br>39. The Consent Holder may only undertake earthworks during the winter period in any year, if those works are undertaken in accordance with an amendment to the SSESCP under Condition 40 that provides for the management of earthworks during the winter period of that year. | Similar to Condition 30 which I prefer. |
| 40. At least 20 working days prior to undertaking earthworks over the winter period in any year, the Consent Holder must prepare an amendment to the SSESCP and submit this to the Manager for certification.<br><br>The purpose of the amendment is to:<br>a) Detail the specific earthworks being undertaken during the winter period of that year; | Similar to Condition 31 which I prefer. |

| | | |
|---|---|---|
| | b) Detail the specific and additional erosion and sediment control measures to be put in place for any earthworks undertaken during the winter period of that year;<br>c) Demonstrate how the measures to be implemented will effectively minimise the potential for sediment discharge or other environmental harm, having regard to the increased frequency, severity, and duration of rainfall, increased groundwater levels, and reduced soil infiltration during the winter period.<br><br>The amendment must include the following:<br>d) Detailed description of the proposed works over the winter period for that year, including area and volume of earthworks;<br>e) Drawings and written description of:<br>i. Existing and if required additional controls to be constructed and installed to appropriately manage earthworks during the winter period;<br>ii. The scope and location of earthworks intended to be undertaken during the winter period of the applicable year;<br>iii. The areas of land that will be stabilised (and maintained as stabilised) prior to and throughout the period during the winter period of the applicable year;<br>iv. Additional staging of earthworks to minimise the area of land that is unstabilised during the period during the winter period of the applicable year;<br>v. Effective methods of progressive stabilisation that will be used for each stage, that account for the time of year that the stabilisation will be applied;<br>vi. Any further measures that the Consent Holder considers may be necessary to achieve effective erosion and sediment control for each stage.<br>f) A summary of the site's compliance and monitoring history (if any), including any recorded incidents, the results of any monitoring, and the outcomes of any site inspections that relate to earthworks or erosion and sediment control measures, and how this has been taken into account when preparing the amendment;<br>g) Details of the methodology for undertaking any additional monitoring that may be required to manage the risks associated with undertaking earthworks during the winter period. | |
| 41. | If an amendment to the SSESCP is certified under Condition 40 for the winter period of any year, no more than 3,000m$^2$ of land may be unstabilised at any one time during the winter period of that year. | Very similar to Condition 33. |
| 42. | If an amendment to the SSESCP is not certified under Condition 40 for the winter period of any year, all areas where earthworks have been undertaken must be stabilised during the winter period of that year. | Very similar to Condition 32. |
| | ## Contaminated land conditions<br><br>[Note to the Expert Panel: Greater Wellington considers that the most efficient approach to providing conditions for the discharge permit for discharges from contaminated land would be to cross reference the relevant conditions of the | Agree with GWRC approach, noting I agree with various changes to these conditions as outlined in Ms Grant's |

| | |
|---|---|
| land use consent under the NES-CS. The following conditions provide for this but may need to be amended if the conditions of the district land use consent change.]<br><br>43. The following district consent conditions apply to discharges from contaminated land authorised by this consent:<br>a) District Consent Condition 36 (which relates to the provision of a Detailed Site Investigation (DSI) report and Contaminated Site Management Plan (CSMP));<br>b) District Consent Condition 66 (which relates to the provision of a Site Validation Report (SVR)).<br><br>*Advice note: The use of land to undertake a DSI is a permitted activity under Rule R81 of the NRP, subject to meeting the conditions of that rule.* | contaminated land Memorandum (Appendix F). |
| ## Rivers and wetlands conditions<br><br>*Discharge quality*<br><br>44. Discharges to any surface water body must not cause any of the following beyond the zone of reasonable mixing:<br>a) The production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;<br>b) Any conspicuous change in the colour or visual clarity;<br>c) A decrease in water clarity of more than 30%;<br>d) Any emission of objectionable odour;<br>e) The rendering of freshwater to be unsuitable for consumption by farm animals;<br>f) Any significant adverse effects on aquatic life. | I disagree condition required as this duplicates NRP standards. |
| *Rivers and natural inland wetlands management plans*<br><br>Eco-Hydrological Management, Offsetting, and Monitoring Plan (EHMP)<br><br>45. At least 20 working days prior to the commencement of works within the bed of a river or natural inland wetland, the Consent Holder must submit an Eco-Hydrological Management, Offsetting, and Monitoring Plan (EHMP) to the Manager for certification.<br><br>The objective of the EHMP is to demonstrate how remediation, offsetting, or compensation for the loss of river and natural inland wetland extent and ecological values will be implemented, monitored, and maintained, in accordance with the conditions of this consent.<br><br>The EHMP must include the following as a minimum:<br><br>*General requirements*<br>a) A staging plan that shows when each area of remediation, offsetting, and compensation will occur in relation to each affected reach of river and area of natural inland wetland;<br>b) Demonstration that the implementation of remediation, offsetting, and compensation will be coordinated with the staging of earthworks and stormwater discharges, so that earthworks and stormwater discharges will not adversely impact the implementation of ecological remediation, offsetting, and compensation;<br>c) A monitoring framework for each area of remediation, offsetting, or compensation, including: | I agree in principle with the requirement for an EHMP but I consider that the final wording needs to conferenced with relevant ecological experts. Note there is an overlap with LEMP in condition 53 that also needs to be reconciled.<br><br>I disagree with several items which duplicate other requirements, for example the requirement relating to legal protection is already proposed as part of application though scheme plans and consent notice provision. |

i. Detail on how the performance measures will be monitored;
ii. Monitoring methods and locations;
iii. Details on the monitoring frequency that is at least annually;
iv. Methods to analyse monitoring results to assess trajectory towards achieving performance targets, and details on trigger thresholds and/or early warning indicators that the performance targets are not being achieved;

d) Description of how any areas of remediation, offsetting, and compensation will be maintained until they have achieved the relevant performance targets;
e) Annual reporting on the results of monitoring and maintenance undertaken;
f) Confirmation of the legal protection and long-term management arrangements for all areas of river or natural inland wetland remediation, offsetting, or compensation;

*River remediation, offsetting and/or compensation*

g) Final SEV assessments for each affected river reach;
h) Final ECR calculations for residual effects, including SEV values, stream widths, impact lengths, offset lengths, and any lag or uncertainty multiplier;
i) Justification for any ECR multiplier used, including treatment of lag, uncertainty, staging, maintenance, hydrology, and any water quality list;
j) Confirmation of the final areas and specific requirements for offsetting or compensation required by Condition **Error! Reference source not found.**, including:
    i. Baseline condition of offset/compensation sites, and any constraints associated with those sites that need to be managed;
    ii. Proposed works, including fencing plans and planting plans that describe the proposed species mix, size and density of planting, and details of eco-sourcing of plants;
k) Confirmation of the performance targets for offsetting or compensation required by Condition 68, including:
    i. Target SEV scores, and the timeframe by which these scores must be achieved;
    ii. Any other performance target that may be necessary to demonstrate that the offsetting or compensation has successfully achieved its purpose of offsetting or compensation for the loss of river bed extent and ecological value.
l) Confirmation of the timing of the implementation of offsetting and/or compensation works, which must be either before or at the same time as works within the affected river reach;

*Natural inland wetland remediation and offsetting*

m) Confirmation of the total areas of natural inland wetland to be retained, and total areas of natural inland wetland required to be remediated, created, or enhanced to address the loss of natural inland wetland extent and values;
n) Identification and mapping of all retained, remediated, created, or enhanced areas of natural inland wetland, including fencing

| | |
|---|---|
| plans and planting plans that describe the proposed species mix, size and density of planting, and details of eco-sourcing of plants;<br>o) Confirmation that ecological and stormwater management functions have been separated;<br>p) Confirmation that areas of natural inland required to be retained are excluded from any offset calculations;<br>q) Confirmation that no net loss of wetland extent and values will be achieved;<br>r) Confirmation of the timing of the implementation of remediation or offsetting works, that demonstrates that remediation or offsetting will be implemented either before or within each stage where wetland loss will occur;<br>s) Confirmation of any additional performance targets for wetland remediation and offsetting required by Condition 77 that demonstrates that no net loss of wetland extent and values will be achieved within 5 years of implementation;<br><br>*Retention wetlands*<br>t) Water quality monitoring within the retention wetland and downstream receiving environments, including temperature, dissolved oxygen, nutrients, sediment deposition, microbiological indicators, and urban contaminants, including trigger levels for adaptive management that are set at a level that ensures that the performance standards required by Condition 89 will not be breached;<br>u) Hydrological monitoring to confirm no adverse downstream flow, thermal, erosion, sedimentation, or baseflow effects, including continuous water level monitoring, and trigger levels for adaptive management;<br><br>*Existing retained wetlands*<br>v) Identification of monitoring sites in retained wetlands, and monitoring approaches including hydrological and vegetation monitoring;<br>w) Minimum ecological criteria for the monitoring of effects on retained wetlands to demonstrate that there will be no loss of extent or ecological value at any existing retained wetland. | |
| Stream Works Management Plan (SWMP)<br>46. At least 20 working days prior to the commencement of works within the bed of any river, the Consent Holder must submit a Stream Works Management Plan (SWMP) to the Manager for certification.<br><br>The objective of the SWMP is to demonstrate that appropriate procedures and methodologies are in place to manage the effects of works on stream bed habitat, freshwater fish, and stream water quality during construction.<br><br>The SWMP must include the following as a minimum:<br>a) A description of all works that will be undertaken within the bed of a river;<br>b) Timing and staging of works that will be undertaken within the bed of a river; | Similar to Condition 59 which I prefer. |

| | |
|---|---|
| c) Construction methodology for the construction of structures that will be placed in the bed of a river;<br>d) A fish management plan that takes into account the fish species that may be present within the relevant catchment, including:<br>i. Method(s) of fish salvage and fish handling that will be used;<br>ii. Identification of appropriate relocation sites;<br>iii. Response to chance finds of fish;<br>iv. Hand capture of stranded fish during dewatering;<br>v. Quantitative measurements for fish size and fish numbers salvaged and relocated;<br>vi. The permits required and held by personnel implementing the plan;<br>vii. Reference to DOC approval under Freshwater Fisheries Regulations where required by the proposed use of exclusion methods;<br>viii. Maintenance and re-fishing requirements should there be a high flow event;<br>ix. Detail on timings, including seasonal requirements and development phasing;<br>x. Potential salvage requirements once the development is operational.<br>e) Detail of any temporary water diversion to separate construction works from flowing water, including location, type, capacities and:<br>i. Calculations and cross sections of the temporary diversions to demonstrate that they can manage flows from the 5% Annual Exceedance Probability (AEP) rain event;<br>ii. Contingency methods should a heavy rainfall event occur or be forecasted while the temporary diversion is in place;<br>iii. Measures to facilitate fish passage upstream and downstream while the temporary diversion is in place.<br>f) Appropriate erosion and sediment control measures for works within the bed of a river;<br>g) Methods to manage and treat any sediment-laden water before discharging from the works site;<br>h) Methods to prevent other contaminants on the works site from entering water, or to land where it may enter;<br>i) Details of all stream bank stabilisation planting to be undertaken;<br>j) Methodologies and timing for reverting the stream bed back to its pre-construction condition in accordance with Condition 61;<br>k) Any other relevant matters to ensure compliance with all conditions. | |
| Culvert Monitoring and Maintenance Plan (CMMP)<br>47. Within 20 working days following completion of any culvert placement or stream piping, and any construction of an earth dam, the Consent Holder must submit a Culvert Monitoring and Maintenance Plan (CMMP) to the Manager for certification.<br><br>The objective of the CMMP is to describe the ongoing monitoring and maintenance measures for the structure to ensure that the structure is | I disagree condition is required, fish passage only required at Taupo Swamp and wetlands B and E. I consider that conditions 57 and 58 are sufficient to manage effects. Culvert design is otherwise certified by engineering |

| | |
|---|---|
| maintained in sound condition and fish passage is maintained and does not reduce over the lifetime of the structure.<br><br>The CMMP must include the following detail and processes:<br>a) How the monitoring and maintenance will be done;<br>b) The steps to be taken to avoid any adverse effects on fish passage;<br>c) The steps to be taken to ensure that the structure's provision for fish passage does not reduce over its lifetime;<br>d) A process for providing updated information on the structure to the Manager every year for the first 5 years of the placement of the structure, and every 2 years thereafter, or after a natural hazard event, for the purpose of reassessing the structures effect on the passage of fish;<br>e) The steps to be taken to ensure that the structural integrity of the structure remains sound in the opinion of a SQEP (chartered professional engineer);<br>f) The steps to be taken to ensure that the structure, including the river bed and banks adjacent inlet and outlet of the structure, remain clear of debris;<br>g) Programme and frequency of routine monitoring and maintenance;<br>h) Record keeping of monitoring results;<br>i) Remediation measures should monitoring and inspections indicate that there is a reduction in fish passage or the integrity of the structure.<br><br>*Advice note: Clause a) to d) of this management plan is required by regulation 69(2) of the Resource Management (National Environmental Standard for Freshwater) Regulations 2020.*<br><br>*Advice note: after the first CMMP is certified, this condition may be met for subsequent culverts or stream piping by amending the CMMP to incorporate any subsequent structure under Condition 10.* | approval under district conditions. |
| *Freshwater fish survey*<br>48. Prior to the commencement of work in the bed of any river, the Consent Holder must undertake a fish survey that confirms (or otherwise) the presence of fish species within each affected river catchment. The Consent Holder must submit the results of the fish survey to the Manager at least 20 working days prior to the commencement of work in the bed of any river. [Note to the Expert Panel: if this condition is not included, then consequential amendments would be required to several other conditions that rely on an understanding of the fish species present within any catchment to assume that the species identified for the Taupō and Kakaho streams in Schedule F1 of the NRP are present within each river reach] | I consider this condition is not required as a fish survey has already been undertaken by thew project ecologist confirming which waterways fish are present in. |
| *Detailed design of in-stream structures*<br>49. At least 20 working days prior to the placement of a structure within the bed of a river, the Consent Holder must submit a detailed design of the structure to the Manager for certification. The detailed design must demonstrate that the design of the structure is in accordance with the conditions of this consent. | I disagree condition is required, fish passage only required at Taupo Swamp and wetlands B and E. I consider that conditions 57 and 58 are sufficient to manage effects. Culvert design is otherwise |

| | | |
|---|---|---|
| | The detailed design must be prepared by a SEQP (freshwater ecologist) and SQEP (chartered professional engineer), and must demonstrate that:<br>a) The design of the structure will provide for the passage of fish that may be present within the catchment, in accordance with the New Zealand Fish Passage Guidelines (NIWA and DOC, Version 2.0, June 2024);<br>b) The design of the structure does not result in an increase in flood depth, flood velocity, or flood hazard compared to the Mt Welcome Flood Risk Assessment dated [placeholder for Panel to insert final date of Flood Risk Assessment report];<br>c) Each culvert inlet and outlet is protected against erosion and scour;<br>d) Each culvert is designed to avoid any aggradation, erosion, and scour of the bed, including any erosion and scour at the inlet and the outlet of the culvert;<br>e) Each culvert will avoid causing or increasing flooding on any neighbouring property;<br>f) Each culvert is designed to avoid blockage by debris or other geomorphic processes (such as the movement of sediment).<br><br>*Advice note: the detailed design of dams is also subject to district resource consent conditions that address design matters including the structural and geotechnical design of dams.* | certified by engineering approval under district conditions. |
| 50. | Structures placed within the bed of a river must be constructed in accordance with the certified detailed design for the structure. | I disagree condition is required, fish passage only required at Taupo Swamp and wetlands B and E. I consider that conditions 57 and 58 are sufficient to manage effects. Culvert design is otherwise certified by engineering approval under district conditions. |
| *General conditions for works in the bed of a river*<br><br>Freshwater fish<br><br>*51.* | The Consent Holder must undertake fish rescue in accordance with the SWMP. All fish rescue must be undertaken by a SQEP with the required permits.<br><br>*Advice note: It is the responsibility of the Consent Holder to ensure that they secure any necessary authorisations from the Department of Conservation, the Ministry of Primary Industry and Fish and Game New Zealand, prior to the commencement of any fish rescue.* | Similar to Conditions 57 and 58, I prefer these as they are linked to the FMP and only relate to structures where fish passage is proposed. |
| 52. | The Consent Holder must provide all stream fish rescue data, including the number, length, and species of each captured fish, to the Manager within 10 working days of completion of the stream works. | Similar to Conditions 57 and 58, which I prefer as they are linked to the FMP and only relate to structures where fish passage is proposed. |

| | | |
|---|---|---|
| 53. | The Consent Holder must ensure that all structures are designed, constructed and maintained to maintain fish passage in accordance with the New Zealand Fish Passage Guidelines (NZFPG) (NIWA and DOC, Version 2.0, June 2024). | Similar to Conditions 57 and 58, which I prefer as they are linked to the FMP and only relate to structures where fish passage is proposed. |
| 54. | Works must not be undertaken in the bed of any river during the spawning periods identified in Schedule F1a of the NRP of indigenous fish species that may be present in the catchment. | Similar to Conditions 57 and 58, which I prefer as they are linked to the FMP and only relate to structures where fish passage is proposed. |
| Temporary diversions<br>55. | The Consent Holder must ensure all temporary water diversions are in place prior to the commencement of works within the bed of a river. The temporary diversion must:<br>a) Be implemented, managed and maintained in accordance with the certified SWMP;<br>b) Maintain fish passage;<br>c) Separate all construction activities from flowing water;<br>d) Remain in place for the full duration of the works in that location; and<br>**e)** Not be removed and the stream flow reinstated until the stream works in that location have been completed**.** | Similar to condition 60 which I prefer. I note that item b redundant for waterways where no fish are present. |
| Reducing effects on water quality<br>56. | The Consent Holder must minimise sediment discharges and effects on in-stream habitats and ecology during the stream works, including but not limited to:<br>a) Completing all stream works in the minimum time practicable;<br>b) Undertaking stream works in dry weather conditions, as far as practicable;<br>c) Avoiding the placement of construction or excavated material in the wetted channel;<br>d) Separating all construction activities from flowing water;<br>e) Installing appropriate sediment control and treatment measures;<br>f) Minimising crossing of the stream bed and keeping crossings to one path only; and<br>g) Minimising machinery in the stream bed and undertaking works from the banks where practicable. | Similar to Conditions 59–61, particularly SCMP requirements and erosion/scour controls. I prefer existing wording. |
| 57. | The Consent Holder must ensure that prior to entering a stream or river that all vehicles and equipment are inspected for the presence of invasive or pest aquatic species including Didymosphenia geminata (didymo). In the event that an invasive or pest aquatic species is discovered upon any vehicle or equipment it must be removed prior to the vehicle or equipment entering the stream or river.<br><br>*Advice note: Advice on cleaning methods is available on the Ministry for Primary Industries website at http://www.mpi.govt.nz/travel-and-recreation/outdoor-activities/check-clean-dry/.* | No direct equivalent identified; could be addressed through the SCMP under Applicant Condition 59 if required rather than as a separate condition. |

| | |
|---|---|
| 58. No dry cement product, unset concrete, concrete wash water or any water contaminated with concrete may enter water, or land where it may enter water. | Similar to conditions 59 and 61, and general contaminant prevention under Condition 20. I prefer existing wording. |
| 59. The Consent Holder must ensure that:<br>a) All machinery being used for the works is regularly maintained in such a manner to ensure no oil, petrol, diesel, hydraulic fluid, or cleaning fluid is released into water, or to land where it may enter water;<br>b) No storage of hazardous substances or re-fuelling occurs within 10m of any surface water body or stormwater system;<br>c) No machinery is cleaned or stored within 10m of any surface water body or stormwater system. | Similar to conditions 59 and 61, and general contaminant prevention under Condition 20. I prefer existing wording. |
| Reducing effects on ecological habitat values<br>60. With the exception of stream reclamation, piping, and the placement of culverts, to maintain the ecological and biodiversity habitat values of the waterbody, the Consent Holder must ensure the bed of the affected water body is reverted back to its pre-construction condition or better upon completion of the stream works. This may include, but is not limited to:<br>a) Removing, stockpiling, and reinstating the natural stream bed materials at the completion of stream works;<br>b) Re-vegetation of any cleared vegetation from the banks of the stream;<br>c) Ensuring that there is a variety of pools and riffles, and backwaters along the affected reach of water body;<br>d) Ensuring that the there is a variety of widths and depths along the affected reach of water body;<br>e) Minimising the use of geotextile fabric within the bed of the water body.<br><br>All works and timing of works to revert the affected water body back to its pre-construction condition or better must be undertaken in accordance with a certified SWMP. | Similar to Conditions 59–61. I prefer existing wording. |
| Erosion/scour and revegetation<br>61. The Consent Holder must ensure that any areas of the stream banks that are cut or disturbed as a result of the works are stabilised and grassed or replanted with native vegetation as soon as practicable following completion of the works.<br><br>All replanting of native vegetation must be maintained for five years or until 80% canopy cover over the relevant area is achieved. | Similar to Condition 61 and planting/maintenance requirements in Conditions 53, 55 and 56. I prefer existing wording. |
| Continuous baseline water quality monitoring<br>62. Conditions 32 to 34, which provide for continuous baseline water quality monitoring, apply to any work being undertaken within the bed of a river.<br><br>*Managing the residual adverse effects of river reclamation and culvert placement*<br>[Note to the Expert Panel: references to *remediation* in the conditions below should be removed if the Panel finds that it is not acceptable for the retention | I agree with this GWRC condition in principle. |

| | |
|---|---|
| wetlands to function as both stormwater management devices and remediation for the loss of river bed extent]<br>Authorised piping and reclamation of Taupō Stream<br>[Note to the Expert Panel: Greater Wellington considers that the application does not demonstrate a functional need to reclaim the Taupō Stream, and consents for this activity should not be granted (see Issue 4). These conditions would only be included if the Panel approves consents for the piping and reclamation of the Taupō Stream.] | |
| 63. The piping and reclamation of the Taupō Stream authorised by this consent must be in accordance with the location, maximum length, minimum size, and maximum gradients of the piping identified in the following drawing(s):<br>a) [Placeholder for final version of the drawings that set out the extent of piping and reclamation. The current extent of piping and reclamation is shown as P-32 and P-33 on drawing number 1753-02-SK8440-R2, prepared by Envelope Engineering, dated 10 March 2026]. | Similar to Condition 1 and Attachment 1 plans which I prefer, noting engineering approval also required under district conditions. |
| 64. The piping and reclamation of the Taupō Stream must not commence until the EHMP has been certified under Condition 45 and the SWMP has been certified under Condition 46.<br><br>Authorised culvert placement<br>[Note to the Expert Panel: Greater Wellington considers that feasibility issues with several culverts need to be addressed before the Panel decides on the approvals (see Issue 11). The placeholder in the condition below allows for the final arrangement of culverts to be confirmed through the Panel's final set of conditions.] | Similar to Conditions 52–53 and 59 requiring LEP/LEMP and SCMP certification before relevant works. I prefer existing wording. |
| 65. The placement of culverts authorised by this consent must be in accordance with the location, maximum length, minimum size, and maximum gradient of culverts identified in the following drawings(s):<br>a) [Placeholder for final version of the drawings that set out the culvert design. The current extent of culvert placement is shown as P-30, P-31, P-34, P-35, P-36, P-37, P-38, P-39, and P-40 on drawing number 1753-02-SK8440-R2, prepared by Envelope Engineering, dated 10 March 2026]. | Similar to Condition 1 and Attachment 1 plans which I prefer, noting engineering approval also required under district conditions. |
| 66. The placement of culverts must not commence until the EHMP has been certified under Condition 45 and the SWMP has been certified under Condition 46.<br><br>Remediation, offsetting, or compensation for residual adverse effects on rivers<br>[Note to the Expert Panel: Greater Wellington considers that the remediation, offsetting, or compensation required to address the residual adverse effects of the reclamation of the Taupō Stream and placement of culverts within the site should be determined in advance of the Panel deciding on the approvals, in order to provide certainty that this can be achieved (see Issues 5 and 6). The placeholder in the condition below provides for the areas of remediation, offsetting, or compensation to be confirmed through the Panel's final set of conditions.] | Similar to Applicant Conditions 52–53 and 59 requiring LEP/LEMP and SCMP certification before relevant works. |

| | |
|---|---|
| 67. The following areas of remediation, offsetting, or compensation must be implemented before, or at the same time as, the piping and reclamation of the Taupō Stream under Condition 63 and the placement of culverts under Condition 65, in accordance with the EHMP:<br>a) [Placeholder for the specification of remediation, offsetting, or compensation packages for residual adverse effects on rivers] | Similar to Condition 1 and Attachment 1 plans, also duplicates new EHMP condition. |
| River remediation, offsetting, and compensation performance targets<br>68. The Consent Holder must implement the remediation, offsetting, and compensation required by Condition **Error! Reference source not found.** so that the following outcomes and performance targets are achieved as a minimum:<br>a) Achievement of the target SEV score identified within the EHMP, within the timeframe identified in the EHMP;<br>b) Any other performance targets that may be set in the EHMP to demonstrate that the remediation, offsetting or compensation has successfully achieved its purpose of offsetting or compensation for the loss of river bed extent and ecological value. | Closest equivalents are Conditions 52–56 and 90–91 for ecological planting monitoring, but no direct equivalent for SEV-based river offset performance targets. Should all be captured under new EHCMP condition. |
| *Monitoring and maintenance of structures in rivers*<br>69. The Consent Holder must provide the information required by Regulation 63 (Culverts) and Regulation 66 (dams) of the National Environmental Standards for Freshwater 2020 by uploading the details into the NIWA fish passage Assessment Tool and providing the Manager with the response number once the upload is complete. The information required by these regulations must be uploaded and provided to the Manager within 20 working days of the completion of construction of these structures. | Very similar to Condition 62. |
| 70. The Consent Holder must monitor and maintain each structure in accordance with the certified CMMP.<br><br>*Advice note: Maintenance does not include any works outside of the scope of this resource consent. Further resource consents may be required for any additional works (including structures, reshaping or disturbance to the bed of the river).* | Duplicates condition 39 which requires monitoring and maintenance schedules. |
| 71. The Consent Holder must submit a report to the Manager on the monitoring and maintenance undertaken in accordance with the certified CMMP annually from the date that the placement of the first structure has been completed. | Duplicates condition 39 which requires monitoring and maintenance schedules. |

| | |
|---|---|
| **Managing the residual adverse effects of activities on natural inland wetlands**<br>Existing retained wetlands<br>72. At least 20 working days prior to the commencement of land disturbance or earthworks within 100 m of any of the existing retained wetlands identified in drawing number 1753-02-SK9250-R1, prepared by Envelope Engineering, dated 6 March 2026, the Consent Holder shall clearly demarcate on site the location of each wetland using fencing or other form of visually distinguishable barrier. The demarcation shall be maintained for the duration of any earthworks or land disturbance being undertaken within 100 m of the wetland. | I agree with this condition in principle as it is in line with standard industry practice. |
| 73. The Consent Holder must undertake monitoring of existing retained wetlands in accordance with the EHMP until all earthworks authorised by the consents have been completed. | Duplicates new condition for EHMP. |
| Authorised loss of wetland extent and values<br>74. The reclamation of wetlands must not exceed the areas of wetland reclamation identified in drawing number 1753-02-SK9250-R1, prepared by Envelope Engineering, dated 6 March 2026. | Covered by General Condition 1 and Attachment 1 plans and new condition EHMP. |
| 75. There must be no loss of extent or ecological value at any existing retained wetland.<br><br>Remediation or offsetting for residual adverse effects on wetlands<br>[Note to the Expert Panel: the figures below represent the figures that Greater Wellington considers is necessary to address the residual adverse effects of the project on natural inland wetlands (see Issue 9). The condition may need to change depending on the resolution of issues related to the design of the stormwater management system and retention wetlands (see Issues 1 and 2)] | This would require separate consent so I consider that a condition is unnecessary. |
| 76. The residual adverse effects of wetland reclamation and the inundation of existing wetlands as a result of damming must be remediated or offset by implementing the following offsetting measures in accordance with the EHMP:<br>a) Remediation and/or creation of 27,220 $m^2$ of natural inland wetland;<br>b) Enhancement of 10,000 $m^2$ of existing retained wetland. | Covered by General Condition 1 and Attachment 1 plans, I do not agree that it should be replicated in text as a condition. |

| | |
|---|---|
| Wetland remediation and offsetting performance targets<br><br>77. The Consent Holder must implement the remediation and offset measures required by Condition 76 so that the following outcomes and performance targets are achieved as a minimum:<br>a) At 5-years after implementation, planted sites achieve:<br>i. At least 80% indigenous vegetation cover;<br>ii. At least 80% emergent vegetation cover within areas of permanent standing water;<br>iii. No established invasive environmental weed species present.<br>b) Presence of hydric soil conditions within the full extent of remediated or created wetlands within 5 years of establishment;<br>c) Any other performance targets that may be set in the EHMP. | This is similar to existing Conditions 55–56 and 90–91 for planting monitoring and noting applicant proposes three year or 80% canopy cover targets. I agree that the wetland specific targets can be carried over. |
| ***Maintenance, monitoring, reporting, and legal protection for river and wetland remediation, offsetting, and compensation***<br><br>Maintenance<br><br>78. The Consent Holder must maintain any river and wetland remediation, offsetting, or compensation required by Conditions **Error! Reference source not found.** and 76 for a minimum of 5 years from the date that the remediation, offsetting, or compensation is completed and until the performance targets in Conditions 68 and 77 have been met. | Similar to Conditions 55, noting applicant proposes three year or 80% canopy cover targets in condition 55. |
| Ecological and hydrological monitoring, reporting, and adaptive management<br><br>79. Within 12 months of commencing the implementation of any river or wetland remediation, offsetting or compensation required by Conditions **Error! Reference source not found.** (rivers) or 76 (wetlands), the Consent Holder must prepare and submit a monitoring report to the Manager and Te Rūnanga o Toa Rangatira. Monitoring reports must be provided annually thereafter for a minimum of 5 years from the date that the remediation, offsetting, or compensation is completed and until the performance targets in Conditions 68 (rivers) and 77 (wetlands) have been met.<br><br>The purpose of the annual monitoring report is to:<br>a) Report on whether the remediation, offset, or compensation areas are achieving, or on track to achieving, the performance targets in Conditions **Error! Reference source not found.** (rivers) and 76 (wetlands);<br>b) Report on whether the development is having adverse effects on the extent or ecological values of existing retained wetlands;<br>c) Identify whether any amendments are required to the EHMP to ensure that the performance targets are achieved.<br><br>The annual monitoring report must be prepared by a SQEP (ecologist) and SQEP (hydrologist).<br><br>The annual monitoring report must include:<br>d) Date(s) the monitoring was undertaken;<br>e) Identification of the persons who undertook the monitoring and evidence the monitoring was undertaken using the methodology set out the EHMP; | The EHMP will set out monitoring requirements and as such this condition is not required. |

| | |
|---|---|
| f) Results of the monitoring, including the results of ongoing hydrological monitoring recommended by the *Mount Welcome – Hydrology Assessment* prepared by Pattle Delamore Partners Ltd dated 14 November 2025;<br>g) An assessment of whether the remediation, offsetting, or compensation has achieved, or is on track to achieving, the performance targets, based on the results of the monitoring;<br>h) Identification of any performance targets that have not been met, or are at risk of not being met, including:<br>i. An assessment of the likely causes for performance targets not being met;<br>ii. Identification of any amendments to the EHMP that may be required to ensure that the performance targets are met. | |
| 80. Where an annual monitoring report submitted under Condition 79 identifies that one or more of the performance targets in Conditions 68 (rivers) and 77 (wetlands) have not been met, or are at risk of not being met, the Consent Holder must submit an amendment to the EHMP under Condition 10 at the same time as they submit the annual monitoring report.<br><br>The amendment to the EHMP must include the following:<br>a) Remedial actions to ensure the performance targets will be met, which may include (but not be limited to):<br>i. Further planting, or re-planting, including new species or additional species; and/or<br>ii. Further pest management to be implemented; and/or<br>iii. Protection and/or exclusion measures, such as fencing.<br>b) Plans showing the remedial actions to be implemented;<br>c) Timing and sequencing of remedial works;<br>d) Further monitoring that may be necessary, including additional monitoring methods or frequency. | As above. |
| Legal protection<br>81. The Consent Holder must enter into an appropriate consent notice, covenant, or encumbrance (or similar legal mechanism) that ensures that, regardless of current land ownership or any future ownership or tenure changes, the remediation, offsetting, or compensation measures required by Conditions **Error! Reference source not found.** (rivers) and 76 (wetlands) are legally and physically protected in perpetuity.<br><br>The Consent Holder must provide evidence to the Manager that the legal mechanisms required by this condition are in place and registered on the relevant titles within six months of the completion of the implementation of the remediation, offsetting, or compensation measure on the subject land. | I disagree this condition is required, legal protection forms part of application through scheme plans and associated covenants and consent notices. |
| ## Stormwater conditions<br>[Note to the Expert Panel: the stormwater conditions set out below are only appropriate to manage the effects of stormwater discharges if the matters raised under Issue 1 and Issue 2 in Greater Wellington's comments on the substantive application are resolved in advance of the Panel making its decision on the | Similar to condition 39. I prefer existing wording. |

application. The conditions set out below may need to change based on the resolution of Issue 1 and Issue 2.]

*Stormwater Detailed Design (SDD)*

82. At least 20 working days prior to the commencement of construction of any stormwater management device, the Consent Holder must submit a Stormwater Detailed Design to the Manager for certification.

The SDD must be prepared by a SQEP (chartered professional engineer).

The SDD must include:

a) A final stormwater network plan that demonstrates that stormwater discharges from impervious surfaces within all allotments, the road network, and the redevelopment of impervious surfaces associated with the construction of an intersection at State Highway 59, will be directed through stormwater management devices that provide for the treatment of contaminants and the management of stormwater discharge volumes to provide for hydrological control in accordance with the Hydrological Control Guidance Note;

b) Supporting plans and calculations, including:

   i. Detailed plans of each stormwater management device, including identification of the contributing catchment for each device, catchment boundaries, and the maximum impervious surface area that the device has been designed for;

   ii. Calculations that demonstrate that stormwater discharges from all impervious surfaces will be managed provide for the hydrological control of stormwater discharge volumes in accordance with the Hydrological Control Guidance Note, and that stormwater management devices have been designed to achieve this;

   iii. Calculations that demonstrate that at least 85% of mean annual runoff volume from all new impervious surfaces will be treated for contaminants in accordance Schedule 29 of NRP-PC1, and that stormwater management devices have been designed to achieve this;

   iv. Details of planting required for any stormwater management device;

c) Information on how the results of ongoing hydrological monitoring recommended in the *Mount Welcome – Hydrology Assessment* prepared by Pattle Delamore Partners Ltd dated 14 November 2025 has informed the stormwater detailed design;

d) Information that demonstrates how each stormwater management device will be maintained in accordance with the Wellington Water Ltd Water Sensitive Design for Stormwater: Treatment Device Design Guideline December 2019;

e) Identification of staging, including:

   i. The staging of construction of stormwater management devices and any associated stormwater reticulation networks;

   ii. When stormwater discharges will commence from each stormwater network;

   iii. How the staging of stormwater discharges will be coordinated with the completion of earthworks stages;

| | | |
|---|---|---|
| | f) Identification of the number of Equivalent Household Units (EHUs) and the area of impervious surfaces for non-residential greenfield development that will connect to all stormwater management devices in each of the stages identified in d);<br>**g)** For any stormwater management device or stormwater network that will be vested to a stormwater network utility operator, confirmation from the stormwater network utility operator that the detailed design of the device or network meets the stormwater network utility operator's requirements for vested stormwater assets**.**<br><br>*Advice note: the detailed design of the stormwater network may also be subject to district resource consent conditions*. | |
| 83. | Stormwater management devices must be constructed in accordance with the certified SDD. | Similar to Condition 40 which I prefer. |
| 84. | Where the results of ongoing hydrological monitoring recommended in the *Mount Welcome – Hydrology Assessment* prepared by Pattle Delamore Partners Ltd dated 14 November 2025 demonstrate that any of the baseline conditions on which the SDD is based have changed to the extent that any stormwater management device no longer achieves the requirements of Condition 82, the Consent Holder must submit an amendment to the SDD under Condition 10 so that the SDD meets the requirements of Condition 82. | I consider this is addressed by condition 50. |

| | |
|---|---|
| *Stormwater Operation and Maintenance Plan (SOMP)*<br><br>85. The Consent Holder must prepare and submit a Stormwater Operation and Maintenance Plan (SOMP) to the Manager for certification at least 20 days prior to the discharge of stormwater commencing from any stormwater management device.<br><br>The objective of the SOMP is to ensure that all stormwater management devices are operated and maintained in accordance with the SDD and the conditions of this consent.<br><br>The SOMP must include:<br>a) Details of the person or organisation that will hold responsibility for long-term maintenance of each stormwater management device;<br>b) A programme for regular maintenance and inspection of each stormwater management device;<br>c) A programme for the collection and disposal of debris, sediment, and other contaminants collected by the stormwater management devices or practices;<br>d) A programme for post-storm inspection and maintenance;<br>e) General inspection checklists for each stormwater management device, including visual checks;<br>f) A programme for inspection and maintenance of vegetation associated with the stormwater management devices; and<br>g) A requirement to retain records of all inspections and maintenance for each stormwater management device, for the preceding 5 years.<br><br>A separate SOMP may be submitted for each stage identified in the SDD. | Similar to condition 43 which I prefer. |
| 86. Discharges from any stormwater management devices must not commence until the Consent Holder has received notice in writing that the SOMP for that device has been certified by the Manager. | Similar to condition 44 which I prefer. |

| | |
|---|---|
| *Restriction on exposed copper and zinc*<br>87. Buildings and structures must not have exposed copper or zinc cladding, roofing, guttering or spouting. | Similar to Condition 47, however I prefer GWRC wording as it is more concise. |
| *As-built plans*<br>88. No later than 20 working days after the construction of each stormwater management device, the Consent Holder must provide the Manager with "as-built" certified plans of the stormwater management devices, demonstrating that the stormwater management devices have been built in accordance with the SDD.<br><br>The as-built plans must be certified by a SQEP (chartered professional engineer) as being in accordance with the stormwater detailed design. | Very similar to condition 45. |
| *Stormwater discharges from retention wetlands*<br>89. Discharges from any retention wetland to any surface water body must not cause any of the following effects beyond the zone of reasonable mixing:<br>a) [Placeholder for performance standards to be determined by the Panel. Greater Wellington considers that these performance standards should cover dissolved oxygen (DO), temperature, E. coli and dissolved zinc and copper] | If GWRC are proposing replicating NRP standards, I disagree with this condition. |
| 90. The Consent Holder must undertake water quality and hydrological monitoring of discharges from each retention wetland, in accordance with the EHMP required by Condition 45, for the duration of this discharge permit. The monitoring required by this condition must be undertaken by a SQEP. | Hydrological monitoring already required by condition 49. |
| 91. The Consent Holder must submit to the Manager once per year an annual report of the results of monitoring required by Condition **Error! Reference source not found.**. | Hydrological monitoring required by condition 50 which proposes 6 monthly reporting, I would defer to GWRC if yearly reporting is more appropriate. |
| 92. If at any time the results of monitoring required by Condition **Error! Reference source not found.** demonstrate that a water quality or hydrological trigger level for the retention wetlands identified in the EHMP is breached, then the Consent Holder must:<br>a) Assess the likely cause of the breach of the trigger level;<br>b) Identify steps necessary to avoid a breach of the trigger level in future;<br>c) Provide a report on the above to the Manager within 10 working days of the trigger level being breached;<br>d) Where the steps identified in b) require a change to the design of the stormwater network or any stormwater management device, the Consent Holder must submit this as an amendment to the SDD under Condition 10 at the same time as the report is submitted to the Manager under c). Once the amendment to the SDD has been certified, the Consent Holder must implement the amendment.<br><br>*Advice note: this condition does not authorise activities outside the scope of these consents. If any works required by d) are not authorised* | Hydrological monitoring already required by condition 50. |

<table>
<tr><td>by existing consents, or breach existing consents, then a new resource consent or a change of consent conditions may be required.</td><td></td></tr>
<tr><td>Maintenance and inspections<br>93. The Consent Holder must operate and maintain the stormwater management devices in accordance with the SOMP.</td><td>Already required by condition 44</td></tr>
<tr><td>94. The Consent Holder must provide an inspection and maintenance report to the Manager on request. A maintenance report must be provided to the Manager within five days of receiving a written request. The maintenance report must include (but not necessarily be limited to) the following information:<br>a) Details of all inspections completed during the year and for the preceding years; and<br>b) Details of all maintenance undertaken during the year and for the preceding years.<br><br>Inspection and maintenance records must be kept for a period of 5 years.</td><td>Same as condition 46.</td></tr>
<tr><td>Financial contributions<br>95. The Consent Holder must pay a financial contribution to the Wellington Regional Council for the residual adverse effects of stormwater discharges from the creation of impervious surfaces authorised by this consent, in accordance with Schedule 30: Financial Contributions of NRP-PC1, being the following level of contribution:<br><br><table><tr><th>Category</th><th>Financial contribution</th></tr><tr><td>Equivalent Household Units (EHU)*</td><td>$4,599 per EHU</td></tr><tr><td>Non-residential greenfield development, including but not limited to new commercial, industrial or town centre areas</td><td>$858 per 100m$^2$ impervious surface area</td></tr><tr><td>New roads and state highways (not in direct support of a new greenfield development)</td><td>$360 per 100m$^2$ impervious surface area</td></tr></table><br>*Dwellings with <55m$^2$ of roof site coverage, or dwellings with roof areas that are redirected to permanently plumbed greywater reuse systems, will be charged at 0.6 of the financial contribution rates.<br><br>Financial contributions must be calculated for each stage identified in the SDD and must be paid prior to the commencement of stormwater discharges from each stage, or on 1 June 2027, whichever is the latter.<br><br>Note: Financial contributions identified in this condition are for the Te Awarua-o-Porirua Whaitua as identified in Schedule 30 of NRP-PC1. If the amount of financial contributions payable changes because of any plan change process prior to those charges being required to be paid, the applicant may apply for a change of condition under section 127 of the RMA.</td><td>I disagree condition that this condition is appropriate for reasons set out in my Planning Memorandum.</td></tr>
</table>

# Appendix 3: Assessment of rules and standards identified by PCC

Appendix B of the PCC's Section 53 comments details rules and standards which PCC consider are applicable to the application, which are not addressed in the substantive application.

The following table follows the format of the Appendix B Table in the PCC Section 53 comments, with an additional column detailing the applicant's position on each matter.

| Rule | PCC Comments | Applicant Response |
|---|---|---|
| **Energy, Infrastructure and Transport** | | |
| **INF – Infrastructure** | | |
| **INF-R2 Noise from construction of new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure** | *The additional information provided to the EPA sought consent under INF-R2. It is acknowledged that the Applicant has made clear that it intends the application to include this rule. However, for clarity, the application documents should be updated to reflect that the land use consent now includes non-compliance with this rule* | The FTAA, like all approval processes under the RMA, relies on the sequential exchange of information all of which is used by the decision maker when considering the proposal. As such, the set of application documents (presumably meant to be the substantive application lodged on 1 April 2026) does not require updating. |
| **NF-R4 Upgrading of existing infrastructure, excluding roads, gas transmission pipelines and transmission lines over 110kV, outside of any specified Overlay** | *Compliance with INF-S1-12.a is not assessed in relation to INF-R4. Based on the wastewater trunk upgrade plans, it is considered likely that this standard is not complied with. This may make those sections of realignment of the wastewater bulk main new infrastructure, rather than an upgrade, depending on the scale of the difference in location. This may affect the relevant rules and standards that need to be assessed.* | The proposal is to upgrade the trunk wastewater as described in the Substantive Application. If the upgrade does not meet the matters in INF-S1-12.a, resource consent would be required as a Restricted Discretionary under INF-R4, which is sought by the Substantive Application, and effects are appropriately assessed. |
| **INF-R8 Upgrading of infrastructure, excluding roads, gas transmission pipelines, walkways, cycleways and shared paths, and transmission lines at or over 110kV, in a Natural Hazard Overlay or Coastal Hazard Overlay** | *INF-R8 relates to upgrading of infrastructure within a Natural Hazard Overlay or Coastal Hazard Overlay and has been assessed in the application in relation to the upgrades of main trunk wastewater infrastructure. Compliance (or non-compliance) with conditions in the rule cannot be confirmed as there is no* | Resource consent has been sought under INF-R8.2a in the Substantive Application, as it is stated in the application that the standards relating to depth and area of earthworks are not met, as this will depend on the depth of the pipe being upgraded. However, effects are addressed in the Substantive Application, noting that |

| | | |
|---|---|---|
| | *construction methodology or earthworks plans provided for the proposed bulk wastewater main upgrade.* | existing ground level will be reinstated at the completion of the work. |
| **INF-R13 Cabinets (not regulated by the NESTF) located outside of any specified Overlay** | *INF-R13 relates to cabinets and has been assessed as not being complied with in the application, and consent has been sought. Compliance with the rule and associated standards cannot be confirmed, and the effects cannot be assessed, as no cabinets are shown on the plans, and no proposed locations or typical drawings are provided.* | No cabinets are proposed and as such it is agreed that INF-R13 is not relevant to the application. Should an infrastructure provider wish to install a cabinet in the future they will need to consider the District Plan at that time. |
| **INF-R19 Above ground lines including associated support structures, excluding transmission lines over 110kV (not regulated by the NESTF or NESETA), outside of any specified Overlay**<br>**INF-R20 Customer connections outside of any specified Overlay** | *INF-R19 and INF-R20, relating to above ground lines and customer connections respectively, have not been assessed. These need to be assessed in relation to utility networks; however, insufficient information is provided in the application to enable these to be assessed in terms of compliance. This is particularly relevant to the proposed 'superlots'. The Applicant has stated verbally that electricity lines will be undergrounded; this should be reflected in the application documentation for clarity.* | No above ground lines as regulated by INF-R19 are proposed, and as no buildings are proposed, no customer connections regulated by INF-R20 are proposed. |
| **INF-R26 Infrastructure not otherwise provided for or subject to any other rule in this table** | *INF-R26 relates to infrastructure not otherwise provided for or subject to any other rule in the INF-Infrastructure chapter. This has been assessed in the application in relation to wastewater retention tanks and pump stations. However, these are shown on the wastewater long-sections as being located underground, so rule INF-R16 is the correct rule for these activities. No construction methodology or earthworks plans have been provided for the wastewater* | It is agreed that the wastewater retention tanks and pump stations are underground and therefore INF-R16 is the correct rule for these aspects. Given that for activities to be permitted under this rule INF-S14 and INF-S15 must be met, which limit earthworks to 1.5m and an area limit of 250m$^2$, they will not be met and resource consent is required for the infrastructure as a Restricted Discretionary Activity under INF-R16.2. It is noted that INF-S14 and INF-S15 are already identified as |

| | | |
|---|---|---|
| | *storage facility. The storage tank is to be located within Stage 1 but is identified in the Civil Infrastructure Report as being installed at later stages of the development (i.e. after bulk earthworks are completed for Stage 1). As such, construction of this infrastructure may trigger additional consent requirements.* | standards not being met by the proposal in Section 11.1.6 of the Substantive Application, and as such the matters of discretion in those standards are also assessed in the Substantive Application. |
| **INF-R38 Upgrading of infrastructure, excluding roads and walkways, cycleways and shared paths, located in an area identified in SCHED7 - Significant Natural Areas** | *INF-R38 has been assessed in the application in relation to the upgrades of main trunk wastewater infrastructure which is within SNA027. However, assessment of the compliance with the relevant standards is incomplete, specifically in relation to INF-S18 and INF-S20.* | INF-S18 relates to trimming, pruning or removal of vegetation in an SNA. INF-S20 relates to removing vegetation associated with earthworks in an SNA.<br>As the wastewater main is located under the existing Ara Harakeke shared path and State Highway 59 Shoulder (as noted on the 8800 series drawings) vegetation is not anticipated to be disturbed and INF-S18 and INF-S20 are not relevant. |
| **INF-R40 New transmission lines and new transformers, substations, switching stations and ancillary buildings for the electricity network, including any ancillary access tracks** | *INF-R40 has not been assessed in the application. This rule relates to transformers, substations, switching stations and ancillary buildings for the electricity network. The Infrastructure Report states that 'reinforcement' of the electricity network is required. As such the rule may be triggered by activities required on the site, such as a new switching or sub-station; however, insufficient information is provided in the application to enable this rule to be assessed in terms of compliance. It is noted that Appendix 4 of the Application includes reference to 'INF-R40'; however, the rule assessed is actually INF-R43.* | It is unknown if or where a substation will be located on the site. It is possible it may be located on another site but be able to service the proposal. As such INF-R40 is not currently relevant to the application. |
| **INF-R42 New infrastructure, including any ancillary access tracks, excluding walkways, cycleways and shared paths,** | *INF-R42 relates to new infrastructure located in an area identified in Significant Natural Areas and has not* | It is agreed that resource consent is required under INF-R42 as a Discretionary Activity. Note the s88 matters specified |

| | | |
|---|---|---|
| **located in an area identified in SCHED7 - Significant Natural Areas** | *been assessed. The main collector road reserve is partially located within SNA029 and so would fall under this rule.* | in the rule are provided in the Substantive Application. |
| **INF-R43 Upgrading of infrastructure and new infrastructure, including any ancillary vehicle access tracks, excluding walkways, cycleways and shared paths, which is located in an area identified in SCHED 9 - Outstanding Natural Features and Landscapes** | *The Application includes assessment of rule INF-R43; however, the rule reference incorrectly states 'INF-R40' rather than INF-R43.* | Noted. |
| **THWT - Three Waters** | | |
| **THWT-R1 New buildings and additions to existing buildings** | *THWT-R1 is included in the Applicant's assessment, which states that compliance is achieved. It is, however, not clear why this rule has been assessed in the application as 'complies' when no buildings are proposed as part of the development. Assessment of this rule will occur when the allotments are developed in the future.*<br>*However, for completeness, it is noted that there are areas of the proposed subdivision that will not be serviced by attenuating stormwater infrastructure (the 'retention wetlands'). These areas are identified on the plans provided at Appendix 30-29 - 1753-02-4650-R1-SW-Post-Dev-Catchments. Therefore, clause THWT-R1-1.b of this rule would not apply to those areas and hydraulic neutrality devices would be required to be installed when the relevant allotments are developed. This is not explained in the applicant's assessment* | It is explicitly noted in the application that THWT-R1 will be engaged in the future. |
| **TR – Transport** | | |
| **TR-R1 All activities with no on-site vehicle parking or loading spaces** | *TR-R1 has not been assessed. There may be allotments where vehicle access is not provided, for example access lots to* | All allotments have direct frontage to a road or have this achieved via an easement |

| | | |
|---|---|---|
| | *reserves. These should be assessed against the standards for pedestrian and cycling access.* | provided in the scheme plan which allow for vehicle access. In considering the matters in TR-S1, which the rule is subject to, all sites are capable of achieving a legal road frontage width of at least 1.8m, no access is proposed for two or more sites, water supply is proposed in legal road, and no building platforms are proposed. As such, each matter in TR-S1 is met, and as such the proposal is a permitted activity under TR-R1. |
| **TR-R2 All activities with on-site vehicle parking or loading spaces or where a vehicle access is otherwise provided**<br>**TR-R3 All activities with on-site parking or loading spaces – Dimensions and manoeuvring** | *TR-R2 and TR-R3 relate to vehicle accesses and parking respectively. These rules have been assessed in the application and consent sought, but no information is provided in the plans for these activities. Compliance with the standards therefore cannot be determined and the effects cannot be assessed.* | As stated in Section 11.1.8 of the Substantive Application, Drawing 3600 in Appendix 30 to that document identifies that there are a number of properties which are within 6m of an intersection and as such are unlikely to be able to meet TR-S5 (annotated on the aforementioned Drawing as a purple circle). The effects are addressed in the Substantive Application. |
| **Hazards and Risks** | | |
| **CL-Contaminated Land** | *The CL-Contaminated Land and HAZ - Hazardous Substances chapter do not contain any rules or standards, as they rely on regulations outside of the district plan.* | Agreed. |
| **NH-Natural Hazards** | *The rules in the NH-Natural Hazards chapter generally relate to activities defined in the PDP as a 'Hazard-Sensitive Activity', 'Potentially-Hazard-Sensitive Activity' or 'Less-Hazard-Sensitive Activity'. Other rules relate to works undertaken by a statutory agency and so do not relate to the applicant. The proposed development does not include any Hazard-Sensitive or Potentially-Hazard-Sensitive activities and so those rules are also not relevant.* | Agreed. NH-R1 is not assessed in the Substantive Application. |

| | | |
|---|---|---|
| | *In relation to Less-Hazard-Sensitive Activities, while these include potentially relevant activities such as buildings and structures that are not used for hazard-sensitive or potentially-hazard-sensitive activities and park facilities and furniture, there is insufficient information to determine whether there are any proposed within the existing flood hazard areas. Additionally, the maps produced with the flood assessment provided with the application identify that the relevant areas will be generally free from flood hazards post-development. As such, rule NH-R1 is also considered to not be relevant.* | |
| **Natural Environment Values** | | |
| **ECO - Ecosystems and Indigenous Biodiversity** | | |
| **ECO-R1 Trimming, pruning and removal of vegetation within a Significant Natural Area**<br>**ECO-R2 Removal of non-indigenous (exotic) vegetation within a Significant Natural Area** | *ECO-R1 and ECO-R4 have been assessed by the Applicant in relation to the proposed roundabout on SH59 and removal of vegetation within SNA027. The INF-Infrastructure chapter is standalone, meaning activities for infrastructure do not need to be considered under other chapters. The activities within SNA027 are associated with the roundabout and will occur within the road reserve and are therefore addressed under INF-R30. ECO-R1 and ECO-R4 are therefore not relevant to those activities* | Agreed that these works should be assessed under INF-R30 not ECO-R1 and ECO-R4. The application seeks resource consent under INF-R30 as a Discretionary Activity for the proposed upgrading of State Highway 59 to create an intersection which is within SNA027. |
| **NATC - Natural Character** | | |
| **NATC-R1 Buildings and structures within coastal margins and riparian margins, including additions to existing buildings and additions to existing structures** | *NATC-R1 has not been assessed. The assessment of the roading standards states that there may be retaining structures within road reserve. It is not clear from the plans where any structures for retaining are to be located and if they will be located within* | No buildings or structures are proposed in riparian margins. |

| | | |
|---|---|---|
| | *riparian margins. There may also be other structures (that are not infrastructure, and therefore covered by the INF rules and standards) that are also proposed to be located within riparian margins.* | |
| **NATC-R2 Earthworks within coastal margins and riparian margins** | *NATC-R2 has been assessed in the application, but the assessment only relates to the wastewater upgrades in SH59 which are addressed by the INF rules and standards. The assessment, however, omits consideration of earthworks not connected with infrastructure within 5m of any rivers below 3m in average width.* | The creation of bunds to form retention wetlands are earthworks within 5m of any rivers below 3m in average width. The resultant effects on natural character have been assessed by the ecologist and landscape architect. |
| **Subdivision** | | |
| **SUB – Subdivision** | | |
| **SUB-R3 Subdivision that creates any vacant allotments, excluding new allotments for infrastructure** | *SUB-R3 is included in the Applicant's assessment. The assessment states that "Allotments in all zones will have provision for connection to fibre optic cable connections". This is not shown on the plans. No assessment is included in relation to power supply (SUB-S7-4) or the setting aside of sufficient land for telecommunication and electricity supply at the time of subdivision (SUB-S7-5).*<br>*Additionally, the application has not shown or discussed compliance with subdivision standards for the superlots (5000, 5001, 5002 and 5003) in relation to access, water supply, wastewater and stormwater disposal and telecommunications and power supply.* | All allotments have frontage to road, which is where trunk fibre will be available. The same applies to power supply.<br>Provision of land for telecommunication and electricity supply is addressed in Envelope Engineering Comments Response Memorandum attached as Appendix C. |
| **SUB-R5 Subdivision of land to create new allotment(s) for Infrastructure** | *SUB-R5, which addresses subdivision of land to create new allotment(s) for Infrastructure, is included in the Applicant's assessment. The Applicant's assessment refers* | Noted, and as such SUB-R5 is not relevant to the application. |

| | | |
|---|---|---|
| | *to allotments proposed to be vested in Council as recreation reserve. Recreation reserves are not infrastructure and therefore do not fall under this rule.* | |
| **SUB-R8 Subdivision that creates building platforms for Hazard-Sensitive Activities or Potentially-Hazard-Sensitive Activities within the Low, Medium or High Hazard Areas of the Natural Hazard Overlay or Coastal Hazard Overlay** | *SUB-R8 addresses subdivision that creates building platforms for Hazard-Sensitive Activities or Potentially-Hazard-Sensitive Activities within the Low, Medium or High Hazard Areas of the Natural Hazard Overlay or Coastal Hazard Overlay and is included in the Applicant's assessment. The application states that here are building platforms located in areas currently mapped as High Hazard Areas (Flood Hazard – Stream Corridor); however, no building platforms are identified on the plans. Compliance with this rule cannot be assessed, and assessment of the effects cannot be undertaken.* | Agreed. As SUB-R8 requires building platforms to be specified, and no building platforms are proposed, SUB-R8 is not relevant to the proposal. |
| **General District-Wide Matters** | | |
| **EW – Earthworks** | | |
| **EW-R1 General Earthworks** | *EW-R1 relates to general earthworks and is included in the Applicant's assessment. While the applicant states that relevant standards will not be met, no information is provided on where and to what extent the standards will not be met. Appropriate assessment of the effects, therefore, cannot be properly undertaken.* | It is stated in Section 11.1.14 of the Substantive Application that the proposal will not meet permitted standards EW-S1 and EW-S2.<br>EW-S1 permits 250m$^2$ of earthworks in a 12 month period and EW-S2 permits cut and fill up to a height of 1.5m.<br>Also relevant to EW-R1 are standards EW-S3 (permitting the transport of 200m$^3$ of material to or from the site), EW-S4 requiring site reinstatement and EW-S5 concerning silt and sediment retention.<br>The earthworks are described in Section 7.5 of the Substantive Application as totalling an area of 81.46ha, with a maximum cut height of |

| | | |
|---|---|---|
| | | 21m and fill depth of 24m. it is also stated that a cut/fill balance will be achieved, site reinstatement will occur, and Erosion and Sediment Control Plans are proffered as conditions.<br>This information allows for an assessment of effects to be undertaken. |
| **LIGHT – Light** | | |
| **LIGHT-R1 Outdoor artificial lighting** | *LIGHT-R1 is included in the Applicant's assessment. The assessment states that this rule applies to street lighting and lighting of parks and reserves and that lighting will comply with these standards. The lighting plan provided with the application only addresses street lighting (which is a permitted activity) and does not provide information on the lighting proposed within reserves. Appropriate assessment of the effects of lighting within the proposed reserves, therefore, cannot be undertaken.* | Any lighting that is proposed within parks and reserves will be designed to meet the standards relevant to LIGHT-R1, and therefore an assessment of effects is not required. |
| **NOISE – Noise** | | |
| **NOISE-R1 Activities generating noise, excluding construction activities and emergency and back-up generators** | *The additional information provided to the EPA sought consent under NOISE-R2. I acknowledge the Applicant has made clear that it intends the application to include this rule but I consider that, for clarity, the application documents should be updated to reflect that the land use consent now includes non-compliance with this rule.* | As per the response for INF-R2, fast track, like all approval processes under the RMA, relies on the sequential exchange of information all of which is used by the decision maker when considering the proposal. As such, the application documents (presumably meant to be the substantive application) does not require updating. |
| **SIGN – Signs** | | |
| **All** | *The Masterplan and Landscape Urban Design Strategy identifies locations of proposed signage for the development. The SIGN chapter is not assessed in the application.* | The Masterplan and Landscape Urban Design Strategy shows locations of potential signage for the development. No decision has been made as to whether signage will be installed at these locations and as such no detail has been |

| | | |
|---|---|---|
| | | determined regarding size. As such, no signage is proposed as part of this application. |
| **TEMP - Temporary Activities** | | |
| **TEMP-R1 Temporary building and structures ancillary to a construction activity.** | *The application seeks consent under TEMP-R1 but provides no information on where and for how long the temporary construction buildings and structures will be in place. Section 17 of the Draft ECMP states that their type and location will be determined by the contractor. No conditions relate to the proposed non-compliance with TEMP-R1.* | As stated in Section 11.1.10 it is likely that buildings for construction works will be in place for greater than 24 months as the development will take 10+ years. The proposal is therefore a Restricted Discretionary Activity under TEMP-R1.4.<br>A condition of consent that temporary construction buildings are removed within one month of construction being completed in any given stage is now proffered. |
| **Area Specific Matters** | | |
| **MRZ - Medium Density Residential Zone** | | |
| **MRZ-R29 Primary production** | *MRZ-R29 makes primary production a non-complying activity. Farming activities are proposed to continue within Lot 5003. The application states that "all activities taking place have existing use rights". This is not established through any evidence provided with the application. The fact that the land use and buildings exist is not, in itself, evidence of existing use rights* | Under the previous (1999) Porirua District Plan, the site was in the Rural Zone (District Plan Maps A3, A4, A7 and A8). Rural Zone Rule D4.1.1(i) permitted *all primary production activities*. The existing farming activities proposed to continue within Lot 5003 were undertaken under this previous zoning/rule regime, and, as far as the Applicant is aware, the effects are the same or similar in character, intensity or scale to those which existed before the proposed plan was notified, and the activities have not been discontinued for a continuous period of 12 months or more. The zoning and rule provides a basis for the legal establishment of this activity. |
| **RLZ - Rural Lifestyle Zone** | | |
| **All** | *No issues identified.* | No comment necessary. |
| **NCZ - Neighbourhood Centre Zone** | | |
| **NCZ-R3 Retail activity and supermarket**<br>**NCZ-R4 Commercial service** | *NCZ-R3, relating to retail activity and supermarkets, and NCZ-R4 relating to commercial* | It is agreed that NCZ-R3 and NCZ-R4 are not relevant to this application, and will instead be |

| | | |
|---|---|---|
| **activity** | *service activities, have been assessed by the applicant. It is not clear why these activities are assessed in the application, when no activities are proposed within proposed Lot 1000 (the commercial 'superlot'). Those rules will be assessed when the lot is developed in the future. As such, the rules are not relevant to the application.*<br>*While it will be addressed when development occurs on the lot, it is noted that residential Lot 254 is partially within the LCZ. Rule NCZ-R14 relates to residential activity within the zone. Standard NCZ-S5 requires residential units to be above ground floor. A future dwelling on Lot 254 may not meet the standard and may therefore require resource consent* | assessed when the lot is developed in the future. |
| **DEV - NG - Northern Growth Development Area** | | |
| **DEV-NG-R1 Activities (excluding subdivision) that are permitted activities in the underlying zone** | *DEV-NG-R1 relates to activities that are permitted activities in the underlying zone. The Applicant's assessment is that, as these activities would be enabled through the subdivision, consent is required and they will not be in accordance with the structure plan. However, as the activities are not actually part of the proposal, the rule is considered to not be relevant to the application.* | As set out in Section 11.1.1 of the substantive application, there are activities, specifically road activities, which form part of the proposal and which are not in accordance with the structure plan. As such it is considered that DEV-NG-R1 is relevant to the application and resource consent continues to be sought as a Restricted Discretionary Activity under Rule DEV-NG-R1.2.a. |
| **DEV-NG-R3 Subdivision of land within the Northern Growth Development Area** | *In relation to DEV-NG-R3 the application incorrectly assesses DEV-NG-R3-1.a. The lots to be subdivided are greater than 3,000m2 in area and therefore the proposal does not comply with the rule condition. This is a minor technicality, as the proposal is a discretionary activity under DEV-NG-R3-4* | The substantive application seeks resource consent as a Discretionary Activity under DEV-NG-R3.4. |

# Appendix 4: Assessment of the National Policy Statement for Infrastructure

The PCC section 53 comments identified that the National Policy Statement for Infrastructure 2025 (NPS-I) had not been assessed. The NPS-I contains a sole objective and 11 policies. The following provides an assessment of those provisions.

| Provision | Assessment |
|---|---|
| ***Objective***<br>*(1) The objective of this National Policy Statement is to:*<br>*(a) ensure the national, regional and local benefits of infrastructure are provided for;*<br>*(b) enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;*<br>*(c) enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;*<br>*(d) ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and*<br>*(e) ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.* | The proposal recognises and provides for infrastructure to support the proposed zoned land use at the site, which will enable the site to be used for the social, economic and cultural wellbeing of people, as well as their health and safety. As per the direction in the District Plan, infrastructure, where possible, is located underground, and as such is compatible with other activities. The infrastructure is proposed as part of the Substantive Application, so that any subsequent proposals for residential or commercial or any other activities are appropriately serviced at that time. |
| ***Policy 1: Providing for the benefits of infrastructure***<br>*(1) Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for.*<br>*(2) Decision-makers must recognise that the benefits of infrastructure include:*<br>*(a) providing for the social, cultural and economic wellbeing of present and future generations;*<br>*(b) creating, supporting and enhancing well-functioning urban and rural environments;*<br>*(c) supporting sufficient development capacity to meet demand for housing and business land;* | The proposed infrastructure will give rise to the benefits associated with that infrastructure for the future activities that are undertaken on the site. |

| | |
|---|---|
| (d) *providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy;*<br>(e) *helping to protect and restore the natural environment;*<br>(f) *supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and*<br>(g) *reducing the risks from, and improving resilience to, natural hazards and climate change.*<br>*(3) Decision-makers must recognise:*<br>(a) *the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and*<br>(b) *that infrastructure networks can be both independent and interconnected.* | |
| ***Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments***<br>*(1) Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments.*<br>*(2) Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to:*<br>(a) *provide services to people and communities in a timely, effective and efficient manner;*<br>(b) *operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries;*<br>(c) *access or connect to particular natural or physical resources, including other infrastructure;*<br>(d) *be accessible so infrastructure activities can be undertaken effectively and efficiently;*<br>(e) *locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure* | Where relevant, infrastructure (such as the SH59 intersection) has an functional or operational need to locate in a particular location and/or environment. In particular, the SH59 intersection needs to operative effectively and efficiently as part of NZTA's linear network, and provide access to the Project site. |

| | |
|---|---|
| *has been spatially identified in advance; and*<br>*(f) manage risks from natural hazards.* | |
| ***Policy 3: Considering spatial planning***<br>*(1) Decision-makers must:*<br>*(a) have regard to the extent to which the infrastructure has been identified within a strategic planning document, while recognising that not all infrastructure can be spatially identified in advance; and*<br>*(b) consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker.* | As has been established, the site is currently used for rural activities but is zoned for residential and commercial, with a structure plan, and infrastructure is needed to service this zoned land use. |
| ***Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities***<br>*(1) Decision-makers must:*<br>*(a) enable the efficient and timely delivery of infrastructure activities;*<br>*(b) enable cross-boundary infrastructure networks;*<br>*(c) provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes;*<br>*(d) enable opportunities to make more effective use of existing infrastructure;*<br>*(e) consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and*<br>*(f) enable the upgrading of infrastructure where this will:*<br>*(i) improve the resilience of infrastructure to the risks from natural hazards and effects of climate change;*<br>*(ii) maintain or improve its level of infrastructure service, including to meet increasing demand; or*<br>*(iii) improve environmental outcomes.*<br>*(2) Decision-makers must:*<br>*(a) recognise it is the role of the infrastructure provider to identify the* | The proposal enables the efficient and timely operation and delivery of infrastructure, in particular through conditions which provide for the staging of infrastructure in response to triggers for the number of lots. |

| | |
|---|---|
| *preferred location for the infrastructure activity; and*<br>*(b) have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.* | |
| ***Policy 5: Recognising and providing for infrastructure supporting activities***<br>*(1) Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by:*<br>*(a) recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised;*<br>*(b) recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and*<br>*(c) enabling the timely delivery of infrastructure supporting activities.* | Not applicable – there are no infrastructure supporting activities such as quarrying. |
| ***Policy 6: Recognising and providing for Māori interests***<br>*(1) Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by:*<br>*(a) taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change;*<br>*(b) recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and*<br>*(c) local authorities:*<br>*(i) providing opportunities for tangata whenua involvement* | Ngāti Toa Rangatira have been consulted over the wider project, which includes the proposed infrastructure. |

| | |
|---|---|
| *where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and*<br>*(ii) operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.* | |
| ***Policy 7: Assessing and managing the effects of proposed infrastructure activities***<br>*(1) When assessing and managing the effects of infrastructure activities, decision-makers must:*<br>*(a) have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work;*<br>*(b) consider the technical and operational requirements and constraints of infrastructure activities;*<br>*(c) take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure;*<br>*(d) take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and*<br>*(e) ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.* | The Substantive Application assesses the effects of the proposed infrastructure activities, and details how those effects will be managed. Such assessment has taken into account matters such as managing effects through consideration of alternatives and the technical constraints of the infrastructure. |
| ***Policy 8: Operation, maintenance and minor upgrade of existing infrastructure***<br>*(1) Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.* | Not applicable – there is limited existing infrastructure. |
| ***Policy 9: Managing the effects of new infrastructure and major upgrades***<br>*(1) Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments.* | The adverse effects of the proposed new infrastructure and upgrades to existing are appropriately addressed in the substantive application, including in relation to section 6 RMA matters. |

| | |
|---|---|
| *(2) Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans.*<br>*(3) Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.* | |
| ***Policy 10: Planning for and managing the interface and compatibility of infrastructure with other activities***<br>*(1) Decision-makers on planning instruments must manage the interface between existing and planned infrastructure and other activities to ensure:*<br>*(a) infrastructure and other activities are as compatible as practicable;*<br>*(b) the safe, efficient and effective operation, maintenance and minor upgrades, and major upgrades of existing or planned infrastructure are not compromised by the adverse effects of other activities; and*<br>*(c) infrastructure activities that are compatible with each other are co-located, while recognising that some types of infrastructure are not compatible.*<br>*(2) Decision-makers on planning instruments must:*<br>*(a) engage with infrastructure providers to:*<br>*(i) understand their existing and planned infrastructure activities and medium to long-term plans;*<br>*(ii) identify appropriate buffers and other methods to protect existing and planned infrastructure from the adverse effects of new or intensified sensitive and incompatible activities, including direct effects, reverse sensitivity effects, and risks to health and safety;*<br>*(iii) support the strategic integration of infrastructure with land use activities;* | The infrastructure proposed is primarily underground, which assists in its compatibility with the land use activities that the zones permit. |

| | |
|---|---|
| *(b) identify:*<br>*(i) activities that are particularly sensitive to the effects of infrastructure;*<br>*(ii) activities that are compatible with infrastructure, or potentially compatible with appropriate buffers, design standards or mitigation measures;*<br>*(iii) infrastructure activities that are sensitive to the effects of other infrastructure;*<br>*(c) apply a range of methods, including, where appropriate:*<br>*(i) the use of buffers in plans to manage sensitive activities, including new or intensified sensitive activities, and incompatible activities near infrastructure;*<br>*(ii) design standards to manage the effects of infrastructure on other activities;*<br>*(iii) special purpose zoning and other spatial-planning layers; and*<br>*(d) ensure that measures to avoid, remedy or mitigate the effects of other activities on infrastructure are consistent with relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies.* | |
| ***Policy 11: Assessing and managing the interface between infrastructure and other activities***<br>*(1) When assessing and managing the interface between existing and planned infrastructure with other activities, including new or intensified sensitive activities, through planning instruments, decision-makers must:*<br>*(a) recognise that noise, vibration, dust and visual effects are all typical effects associated with infrastructure activities that can be managed where practicable but not completely avoided;*<br>*(b) recognise that:*<br>*(i) amenity values change due to a range of factors;* | The infrastructure proposed is primarily underground, which assists in its compatibility with the land use activities that the zones permit. |

| | |
|---|---|
| *(ii) changes in amenity values from infrastructure activities can be necessary to achieve well-functioning urban and rural environments; and*<br>*(c) apply the general principle that the primary responsibility for managing adverse effects is on the new activity (including infrastructure) while allowing flexibility for site- and project-specific circumstances.* | |

# Appendix 5: Assessment of changes to conditions sought by PCC

| Matters raised by PCC | Response on behalf of Applicant |
|---|---|
| | *Note: all references to conditions use numbering in the 31 July 2026 version of proposed conditions (response to Minute 5). Additional conditions of consent proposed by the Applicant are set out in blue text.* |
| **7.1.3 Consent notices vs covenants**<br><br>The proposed conditions confuse the purpose, structure and requirements of consent notices and covenants. For example, proposed condition 123 is listed under the heading of 'Conservation covenants', but this is itself listed under the broader heading of 'Consent Notices'. This is somewhat confused, as covenants are not a type of consent notice. Additionally, condition 123 does not actually include any requirement for a conservation covenant (or consent notice) to be created. This means that the condition is ineffective. | The wording of this conservation covenant was adapted from a previous PCC consenting process for a recent residential development. The intent is that conditions 105 and 106 provide a mechanism to enter into a covenant under section 77 of the Reserves Act, and that condition 123 alerts future land owners to the requirements of this covenant.<br><br>It is unclear what relief PCC is seeking, potentially removing the term "covenants" from the subheading of condition 123. If so, the Applicant supports this.<br><br>Otherwise, I agree with PCC that condition 123 is inconsistent with other conditions that require consent notices, and I consider the following condition be added after condition 123:<br><br>124. This condition must be the subject of a Consent Notice under section 221 of the RMA registered against the new Records of Title for<br><br>Lots 7, 12, 13, 14, 50, 51, 52, 1200, 1202, 1204, 1205, 1206, 1208, 1301, 1306, 1308, 1311, 1315, 1324, 1325, 1400 and 5003 and must be prepared by Council at the cost of the Consent Holder.<br><br>The Applicant otherwise would support any other changes that improve the effectiveness of these conditions. |

| | |
|---|---|
| **7.1.5 Consent condition referencing**<br><br>As noted in Appendix 1 to Minute 5 from the Panel, the numbering of the Applicant's proposed conditions, including internal cross referencing, needs to be reviewed. For ease, the references to condition in the sections below relate to the numbers in Appendix 1 to Minute 5 from the Panel. | I agree that the conditions need to have correct numbering and cross referencing prior to the Panel making a decision. |
| **7.2.1 Urban Design**<br><br>Additional consent conditions are required to respond to the recommendations of the urban design review. Including:<br><br>• Requiring a consent notice on Lot 5003 for delivery of eastern track through any future development;<br><br>• Assumptions for the number of dwellings to be provided for by water, wastewater and stormwater infrastructure networks within the development;<br><br>• A consent notice on Lot 1000 requiring future development to be in accordance with a precinct plan to be developed prior to granting of the consent;<br><br>• Implementation of design guidelines; and<br><br>• Amendments to condition 110 consent notice wording.<br><br>I reiterate that many of the recommendations from the urban design review should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions. | • I disagree that a consent notice is required to alert future owners/developers to the need to comply with the Structure Plan, this is an existing requirement of the District Plan that future owners will need to comply with anyway.<br><br>• I consider that the proposed conditions adequately restrict buildings and impervious surfaces to ensure that the development footprint is within design capacity for infrastructure including three waters infrastructure.<br><br>• I disagree that a consent notice is required for Lot 1000 requiring future development to be in accordance with a precinct plan. I consider that the District Plan can be relied on for design constraints and controls.<br><br>• I disagree with the condition requiring on-lot design guidelines. I consider that the District Plan provides a framework to guide future development, unless there are specific matters where a condition is proposed to manage a specific adverse effect, such as restrictions on building height and cladding on ridgelines.<br><br>• I note that Mr Dobson has provided confirmation in his urban design Memorandum in Appendix H that conditions 114 and 115 that place restrictions building height, cladding and landscaping relate specifically to outcomes of the Landscape Visual Effects Assessment (LVEA) not the Masterplan and Landscape Urban Design Strategy (MLUDS). As such, I consider that conditions 114 and 115 are appropriate (formerly condition 110). |

| | |
|---|---|
| **7.2.2 Subdivision design**<br><br>Again, many of the issues identified should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions. This includes, for example, providing for roading connections to the southern boundary. However, amendments to the conditions should also be made in relation to:<br><br>• Infrastructure servicing for superlots;<br>• The sequencing of development staging;<br>• The integrated delivery of infrastructure, particularly three waters infrastructure, for each stage of development;<br>• Amendments to the limitations on residential development proposed through consent notices to enable higher density within a walkable catchment of the commercial centre;<br>• Access to the proposed stream offset area; and<br>• Limitations on development of access allotments greater than six metres wide. | • I agree the final condition set needs to ensure that infrastructure staging conditions are based on engineering advice. I note that several conditions have been amended post-lodgement to apply to dwelling numbers rather than stages in order to provide for flexible staging.<br><br>• The substantive matter of limiting building numbers on sites is addressed in my Planning Response Memorandum. I disagree that changes are required to these conditions for these reasons.<br><br>• I agree that the easement to the proposed stream offset area should be extended to the end of the area, these changes are reflected in an updated scheme plan attached to the Envelope Engineering Memorandum in Appendix C.<br><br>• I consider that it is highly unlikely that future owners would try to construct buildings within JOALs, if Council has encountered this issue before a condition of consent would be acceptable for clarity. |
| **7.2.3 Infrastructure and servicing**<br><br>Additional consent conditions are needed in relation to the three waters infrastructure, as identified in the comments from Tiaki Wai. I reiterate that many of the issues identified by Tiaki Wai should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions.<br><br>Similarly, revisions to plans will need to be undertaken to identify sufficient land for telecommunication network infrastructure, transformers and any associated ancillary services for telecommunication and electricity supply. | • Mr Dirse has provided commentary on the Tiaki Wai conditions in his Engineering Response Memorandum (Appendix C), I defer to him in the first instance on the substance of these conditions as these conditions are intertwined with infrastructure design and capacity modelling. I consider that these conditions will likely need to be conferenced with Tiaki Wai and PCC.<br><br>• The Applicant is not seeking consent for ancillary telecommunication or electricity infrastructure such as substations.<br><br>• I am unsure what the purpose of a consent condition requiring undergrounding of utility lines would be. The Applicant has |

| | |
|---|---|
| Additional conditions are needed to require undergrounding of all utility services.<br><br>I consider that, for clarity, the conditions would also benefit from an advice note stating that nothing in any approved consent obliges Porirua City to accept vesting of any allotments or assets or to approve any connection(s) to Porirua City infrastructure. | confirmed that utility services are underground, which is consistent with District Plan requirements. If the Applicant wished to put electricity lines above ground, they would need to seek consent under the District Plan.<br><br>• I am not sure what the purpose of the advice note would be regarding PCC's obligations to accept vesting of infrastructure or not. Condition 34 requires PCC approval of assets before they are vested:<br><br>34. Prior to the commencement of the construction of any new public assets to be vested in Council, the Consent Holder must obtain Engineering Plan Approval from Council for those assets. |
| **7.2.4 Parks and reserves**<br><br>Amendments to conditions are needed to better integrate the proposed tracks within cut and fill earthworks areas.<br><br>Additional conditions should be included in relation to parks and reserves, to require, in summary:<br><br>• A Fire Control Plan setting out details for a low-flammability planting buffer between tracks and private dwellings, locations of planted fire breaks, and plant species, numbers, size, spacing, layout and grade including locations and species for low-flammability plants for each of the low-flammability planting areas;<br><br>• A Pine Management Plan setting out details of the long-term management of existing pine tree belts, the removal of wilding pines that spread beyond the existing pine tree belts, and the management of pine tree stumps.<br><br>• Neighbourhood Purpose Reserve Detailed Design Plans;<br><br>• Reserve Land Landscape Planting Plan; | I disagree that these conditions are required, they are all covered by existing conditions as follows:<br><br>• The final Landscape and Ecology Plans (LEP) will address: fire control planting locations and species, reserve land landscaping (condition 26). I note that PCC must certify this plan before planting commences.<br><br>• The Landscape and Ecology Management Plans (LEMP) will address: pest plant including pine management, terrestrial revegetation management, terrestrial offset planting and outcomes monitoring (condition 27). I note that PCC must certify this plan before planting commences. There is also a separate condition requiring maintenance of plantings for three years or until 80% canopy cover achieved (condition 89).<br><br>• Detailed design for reserves, tracks, play equipment and surfacing will all come though engineering approval, and the Consent Holder must obtain PCC approval before these are constructed (condition 34). |

| | |
|---|---|
| • Track design plan and track marking;<br>• Terrestrial revegetation management plan;<br>• Terrestrial Offset Planting and outcomes monitoring;<br>• Certification of construction of play equipment and play surfacing within parks with relevant standards;<br>• As-built plans for neighbourhood reserves, playgrounds, and tracks;<br>• Fencing adjoining reserves to be maintained by the owners of adjoining lots;<br>• The interface between the Neighbourhood community reserve and the adjoining commercial centre on Lot 1000. | • There already is a proposed condition stating that fencing next to reserves is the responsibility of landowner, not Council (condition 112).<br>• PCC will have oversight and approval of the design of the park including the interface through engineering approval under condition 34. The future design of the commercial centre itself will require separate design and consents under the District Plan, and consideration of an appropriate interface can be considered through this design and consenting process. |
| **7.2.5 Landscape, natural character and visual amenity**<br><br>Additional consent conditions are needed to address the landscaping related to the new intersection on SH59 and associated cut faces. The relevant consent conditions should also address the wider works within the SH59 road reserve, specifically the reinstatement of the areas within the road reserve that will be affected by the proposed wastewater main upgrades south of the site and the installation of the new water supply main north of the site. | I agree that this matter could be addressed by a consent condition, as does Mr Dobson who proposed the following in his Landscape Memorandum (Appendix H). I agree that this condition should deliberately not provide for certification as NZTA is the road controlling authority not PCC. This condition should however provide the Panel with confidence that these effects are being managed:<br><br>Landscape Mitigation and Reinstatement<br><br>Prior to the commencement of landscaping works within the SH59 road corridor, the Consent Holder shall submit to PCC for information evidence of agreement by New Zealand Transport Agency Waka Kotahi (NZTA) as the Road Controlling Authority, a SH59 Landscape Mitigation and Reinstatement Plan ("Plan") prepared by a suitably qualified and experienced Landscape Architect.<br><br>The Plan shall include, as a minimum: |

| | |
|---|---|
| | a. Measures to mitigate the visual effects of the new site entrance, associated earthworks and cut batters within the SH59 road corridor.<br><br>b. Landscape treatment of the cut batters on both sides of SH59, including planting, hydroseeding, erosion control and any other measures necessary to integrate the earthworks into the surrounding landscape and support the character and amenity values of the General Rural Zone.<br><br>c. Reinstatement and rehabilitation of all areas within the SH59 road reserve disturbed by the construction of the development, including the installation of the wastewater main south of the site and the water supply main north of the site.<br><br>d. Details of plant species, grades, densities, establishment methods and maintenance requirements for a minimum establishment period of three years, including replacement of any plants that fail during this period. |
| **7.2.6 Ecology**<br><br>Many of the issues identified should be addressed through revisions to the Ecological Assessment and plans prior to a consent being granted, as these issues cannot be addressed through consent conditions. However, amendments to the proposed conditions should be made in relation to:<br><br>• An acoustic bat survey before construction commences. If long-tailed bats are recorded during the survey, a Bat Management Plan (BMP) will need to be prepared and implemented;<br><br>• Nest checks for all indigenous scrub or forest habitats across the entire construction footprint and rank grassland habitat. If active nests are detected immediately prior to vegetation clearance, an appropriate setback will need to be implemented to avoid harming | • I disagree that a bat survey condition is required for the reasons outlined in Dr Keesing's Memorandum (Appendix D), Dr Keesing states:<br><br>> I remain strongly of the opinion bat presence is highly unlikely given the absence of records locally and the opinion of the bat expert involved in the PCC plan change assessment. Furthermore, the pine tree lots do not provide bat habitat.<br><br>> …<br><br>> However, with respect to bat presence and use of the pine and shelterbelt trees, the resultant actions of the developer where bats are detected is management through the DOC tree felling protocol. |

| | |
|---|---|
| chicks and eggs. Relocation of indigenous birds' nests must not be considered as a management option.<br><br>Significant additional conditions and amendments will likely be needed following any revision of the Ecological Assessment and plans noted above. | Thus, if bat presence in the farm on the pine and macrocarpa trees remains of issue and acoustic surveys are considered necessary then that process can occur post consent and be added into the site wide hydro-ecological management plan. This would cause firstly an acoustic survey and determination of presence or, as would be my preference, adopting directly the DOC protocol for the felling of the macrocarpa and any pine tree after a bat expert has considered which trees are potential roost or colony / breeding trees.<br><br>• I agree that a condition of consent requiring native bird nest checks within SNA is appropriate (condition 48), for the reasons outlined in Dr Keesing's Memorandum (Appendix D). Dr Keesing states:<br><br>I agree with a need for native bird nest checks in SNA prior to SNA vegetation clearance if clearance is undertaken during the breeding season (August-February), and that nest relocation should not be undertaken. |
| **7.2.7 Natural hazards**<br><br>Additional consent conditions should be included in relation to geohazards as identified in the geotechnical review.<br><br>Additional consent conditions should also be included in relation to modelling of flooding effects within the wider environment, as identified in the comments from Tiaki Wai. | • See Ms Jones' Geotechnical Memorandum (Appendix I) for commentary on geotechnical conditions. I have provided planning input into their drafting and accept her final recommendations with regard to these conditions.<br>• I disagree that an additional flood modelling condition is required for the reasons outlined in Mr Dirse's Memorandum (Appendix C), Mr Dirse states:<br><br>Mount Welcome sits near the head of the catchment, so the attenuation delays and reduces peak discharge and assists downstream conditions rather than worsening them. This is the opposite of attenuation low in a |

| | |
|---|---|
| | catchment, such as at Plimmerton, where delayed discharge can coincide with the downstream peak. The cut-off model demonstrates that development effects are mitigated at the model boundaries, supported independently by the attenuation design returning post-development peaks to pre-development levels.<br><br>Not accepted: rebuilding and extending the model downstream of the Taupō Swamp, a catchment-wide Northern Growth Area model, or separate modelling of the Kakaho East lots, whose contribution is a very small proportion of that catchment and would not materially change modelled flood depths. |
| **7.2.8 Transport**<br><br>Many of the issues identified should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions. This includes, for example, providing for roading connections to the southern boundary. However, in my view, amendments to the conditions are also necessary to address standard processes required to be undertaken as part of subdivisions involving the vesting of roads. The necessary amendments to the proposed conditions are contained in the technical memorandum provided by Mr Karthik Aale. | See Mr Whittaker's Transport Memorandum (Appendix G) for commentary on transport matters, including several conditions. He does not recommend any specific further changes to conditions, apart from agreeing with changing conditions 22 and 23 to require stage-specific Construction Traffic Management Plans (this is addressed in item 7.2.12 below with regard to construction management). |
| **7.2.9 Geotechnical**<br><br>Proposed amendments to the proposed conditions are contained in the technical memorandum provided by T&T. With these amendments, two remaining geotechnical issues would remain unresolved, which may also require additional consent conditions to be imposed. | See Ms Jones' Geotechnical Memorandum (Appendix I) for commentary on geotechnical conditions. I have provided planning input into their drafting and accept her final recommendations with regard to these conditions, which include:<br><br>• Amending conditions 26, 29, 31, 32, 33, 53, 55, 95, 96 and 97; and<br><br>• Deleting conditions 68, 97, 98,99 and 100. |
| **7.2.10 Contaminated land** | Ms Grant has reviewed the contaminated land conditions in her Memorandum (Appendix F). I agree with her proposed changes and |

| | |
|---|---|
| Proposed amendments to the proposed conditions are contained in the technical memorandum provided by SLR. With these amendments, the contaminated land issues would be fully resolved. | consider that they improve efficiency and effectiveness of the conditions. |
| **7.2.11 Historic heritage and archaeology**<br><br>Additional consent conditions requiring adherence to an accidental discovery protocol and submission of an Archaeological Management Plan approved by Heritage New Zealand Pouhere Taonga would be beneficial. | I disagree additional conditions are required as they would duplicate the Archaeological Authority conditions (note that in the Applicant's response to Minute 4 the condition is recommended to be removed). I consider that an advice note could be useful to alert readers to the separate approval. |
| **7.2.12 Construction management**<br><br>An additional consent condition should be included for the certification of the overarching ECMP, which would then inform the Stage-Specific ECMPs. An additional condition clause should be included requiring the overarching ECMP to set out how the surrounding community will be informed of upcoming works.<br><br>In relation to the requirements of the Construction Noise and Vibration Management Plan, proposed condition 22 should clearly state the site-specific noise and vibration limits.<br><br>Proposed condition 60 should reflect Sections 6.1 and 7.1 of the Construction Noise and Vibration Assessment in relation to setback distances to trigger potential exceedance.<br><br>Additional consent conditions should be included to require site-specific CTMPs, similar to the requirements for stage-specific ECMPs and ESCPs. The initial CTMP could provide the overarching principals and procedures, while the stage or site specific CTMPs would provide the detail. Additional consent conditions to ensure continuous public access to Ara Harakeke Pathway during upgrades to the wastewater bulk main are also considered necessary.<br><br>I consider that the consent conditions should be amended to reflect a more streamlined process for ESCPs. Greater Wellington Regional Council | • I agree that certifying an overall ECMP would be appropriate as outlined by Envelope in their Engineering Memorandum in Appendix C, noting that this would soon be superseded by a stage-specific ECMP.<br><br>• I am not sure which site-specific noise and vibration limits are being referred to by PCC. Condition 24 requires a Construction Noise and Vibration Management Plan (CNVMP) to be certified by PCC which seeks to manage noise and vibration effects associated with construction. It provides a process where PDP noise and vibration limits cannot be complied with.<br><br>• With regard to condition 64 (formerly 60), I do not consider that the level of detail sought by PCC is required when there will be a certified CNVMP managing any potential adverse effects.<br><br>• I agree that stage-specific CTMPs would be appropriate. When development stages are undertaken, there will be more detail known about how each stage might get progressed. Also, in later stages consideration needs to be given to effects on vested road and new residents in constructed homes.<br><br>22. At least 20 working days prior to each stage of earthworks ~~works~~ commencing, the Consent Holder must submit a ~~final~~ Stage Specific Construction Traffic Management Plan (SSCTMP) for certification by Council in accordance with Condition 8. The |

| | |
|---|---|
| should take the lead in certifying the ESCPs for the site. The ESCP(s) should be provided to Porirua City Council for review and comment prior to being submitted to GWRC for certification. The final certified ECMP(s) should then be provided to Porirua City with the ECMP submitted to the council for certification.<br><br>Given the location of PS1 and the purposed timing of wastewater modelling and construction of any storage facility, specific conditions relating to the construction of the proposed wastewater storage facility are necessary.<br><br>Additional conditions should be included to ensure that any updates to management plans or other construction plans are provided to council through comprehensive updates to the documents, rather than any reliance on information provided through other means. | SSCTMP must be prepared by a SQEP with expertise in traffic management. The objective of the SSCTMP is to ensure that activities on the surrounding road network operate safely and efficiently for all road users during demolition, earthworks, and construction. The Consent Holder must consult NZTA during the preparation of the ~~final~~ SSCTMP for all works within the state highway road corridor. The Consent Holder must include a copy of any input provided from NZTA to Council.<br><br>• I agree that public access along Ara Harakeke should be provided for during wastewater upgrade works. I consider Condition 23(h) should be amended which already provides for public access during roundabout construction:<br><br>23. The CTMP must include specific details relating to avoiding, remedying or mitigating adverse effects on the environment from demolition, earthworks, construction and management of all works associated with this development, and set out procedures to be followed which ensure compliance with the conditions of consent, as follows:<br>a. Contact details of the appointed contractor or project manager (phone number, email, postal address);<br>b. General outline of the construction programme for each stage;<br>c. Details of Site access / egress for the relevant stage of construction and any limitations on truck movements. All egress points must be positioned to achieve appropriate sight distances;<br>d. Plans showing the location of any site offices, workers facilities, and worker car parking required during the relevant stage of construction;<br>e. An overview of measures that will be adopted to prevent unauthorised public access during the construction period; |

| | |
|---|---|
| | f. Construction dates, hours of operation and any restrictions on Site access at certain times;<br>g. Temporary protection measures to be installed to minimise any damage to public roads, footpaths, berms, kerbs, reserves or other public assets as a result of demolition, earthworks, and construction activities;<br>h. Provision for maintaining safe active mode movements on the Ara Harakeke in the vicinity of the new roundabout when this is under construction, as well as during upgrades to main trunk wastewater infrastructure within the vicinity of this walkway; and<br>i. Identification of haulage routes for both large trucks and any over-sized vehicles.<br><br>• I agree with PCC's proposed changes to SSESCP certification. This is predominantly a GWRC matter, but PCC is affected in terms of impacts on stormwater and roading infrastructure. I consider that condition 14 should be amended so PCC provides input to GWRC but is not a certifier.<br><br>19. At least 20 working days prior to the commencement of each stage of earthworks, the Consent Holder must submit to the Manager, Resource Consents and Monitoring, for review and input ~~certification by the Council~~, a Stage-Specific Erosion and Sediment Control Plan (SSESCP) in accordance with Condition 8. The SSESCP must be prepared by a SQEP with expertise in earthworks management. The objective of the SSESCP is to reduce the rate of erosion and minimise the amount of sediment discharged from bare earth surfaces, while providing practical measures to reduce the total amount of sediment leaving the site. The Consent Holder must provide a copy of any input provided from PCC to GWRC prior to their certification. |

| | |
|---|---|
| | • I consider that the design of the wastewater storage facility would be addressed at the detailed design stage through engineering approval. Mr Dirse states in his Engineering Memorandum (Appendix C):<br><br>A construction methodology specific to the Lot 1300 storage will accompany the concept layout, addressing sequencing relative to adjacent occupation and the co-located Stage 1 wastewater pipe and Stage 5A stormwater pipe. Storage is proposed to be delivered progressively as demand triggers it rather than as a single Stage 1 structure. |
| **7.2.13 Reverse sensitivity**<br><br>Additional consent conditions are likely necessary to manage the potential reverse sensitivity effects, or direct noise effects, relating to the existing helicopter hanger and helipad on the site and its associated uses. The structure and wording of the conditions would relate to whether the helicopter hanger and helipad and any associated activities have been legally established. | I agree that a condition should be added 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. |