



REFERRAL APPLICATION

Cannon Point Development, Upper Hutt

Subject to the Fast-track Approvals Act 2024

26 June 2026

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Project details

Project Name	Cannon Point Development Ltd
Project Description	A residential and commercial land development project of 162 homes and commercial land in Upper Hutt, along with associated subdivision, roading and servicing infrastructure, parks, and earthworks.
Referral Application reference number	FTAA-2605-1243
Applicant Name (NZBN)	Cannon Point Development Ltd (NZBN 9429047238770)
Landowner (y/n)	Yes
Street address	2, 4, and 61 Colorado Road, Upper Hutt
Legal description	Lot 2001 DP 588162 Lot 1000 DP 598401 Lot 3 DP 306622 Lot 4 DP 306622 Lot 6 DP 46315 Lot 2 DP 52931 Lot 301 DP 588162 Lot 1 DP 54694
Land area	35.9278 ha (all land) 13.9524 ha (development footprint) 6.8156 ha (reserve to vest) ¹ 2.5286 ha (road to vest) 18.7877 ha (balance)
Council names	Wellington Regional Council Upper Hutt City Council
District plan zoning	General Rural Rural Lifestyle Open Space
Address for contact (Agent)	Derive Consulting Group Ltd Attn: Charlie Hopkins contact@derive.nz
Address for invoicing	Cannon Point Development Ltd Attn: Simon Zhang Email: gsdmanagementnz@gmail.com CC: contact@derive.nz
Date of this application	26/06/2026
Document control number	840988011

¹ This figure excludes Lot 301 DP 588162 which is owned by Council.

Quality control

Date	Version	Name	Notes
14 January 2026	Template	Shaun Burton, RM Consultant, Derive Consulting Group	Internal
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22 June 2026	Approved as final	Charlie Hopkins, Director, Derive Consulting Group	Internal
26 June 2026	As lodged	Shaun Burton, RM Consultant, Derive Consulting Group	External

Applicability

This report has been prepared for the exclusive use of the Applicant for the sole purpose of obtaining a Referral of the project from the Minister. The report is based on the information provided by the Applicant and the best professional judgement of Derive Consulting Group Ltd (the Consultant). The Consultant accepts no liability or responsibility for any use of this report without the prior written agreement of the Consultant. Any reliance on this report by a third party is at that party's own risk, and the Consultant disclaims all liability in this respect. Any copy, distribution, or reuse of this report must not occur without the written approval of the Consultant. Notwithstanding anything above, this report can be relied upon by the New Zealand Government, Te Kāwanatanga o Aotearoa, in its consideration of the application.

The Consultant has visited the subject site numerous times over two years, with the most recent visit occurring on 16 April 2026.

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Definitions

- Approved Solutions means a stormwater tank outlined in Wellington Water’s *Managing Stormwater Runoff: The use of approved solutions for hydraulic neutrality*. Version 5.
- Council means Upper Hutt City Council.
- District Plan means the Upper Hutt Operative District Plan.
- ESCP means an Erosion and Sediment Control Plan
- FTE means Full Time Equivalent.
- NRP means the Natural Resources Plan which is a regional plan.
- PC1 means Plan Change 1 to the NRP.
- RDA means Restricted Discretionary Activity in the context of the status of a rule.
- Regional Council means Greater Wellington Regional Council.
- SED means Specific Engineered Design.
- SNA means Significant Natural Areas.

Executive Summary

This report is submitted in support of the application by Cannon Point Development Ltd (CPD) for approval of Stages 3 and 4 of its development project at Colorado Road, Upper Hutt, as a referred project under the Fast-track Approvals Act 2024 (FTAA 2024).

The project is a comprehensively planned, low-density residential community of 162 new homes, two new commercial allotments, and supporting infrastructure to be delivered across two separate blocks of land that 'bookend' the existing Cannon Point development (being the **West Block** and the **East Block**), (the **Project**). The Project will subdivide the West Block and East Block to create 188-lots, of which 162 will be used for residential development, two will be developed for the centrally located small commercial precinct, and three will be kept as large balance allotments. The remaining 21 lots will be used as road reserve and drainage reserves. The Project also includes extensive landscape and ecological enhancement, including the protection and restoration of two natural inland wetlands and the creation of new walking and cycling trails designed to connect to existing trails and footpaths within the Tōtara Park Area.

The Project is located on two blocks of land (being the **West Block Site** and the **East Block Site**) on the northern edge of the existing Tōtara Park urban area in Upper Hutt, which total approximately 10.43 hectares (ha) of land. The Project represents a coherent and efficient continuation of the existing urban area and has been designed to carefully integrate with the now completed Stages 1 and 2 of the Cannon Point development and the surrounding Tōtara Park community. The Project will make a meaningful contribution to housing supply in Upper Hutt City and the Greater Wellington Region by delivering 162 additional serviced residential homes adjacent to an already established neighbourhood. It also represents a logical response to regional housing demand by utilising currently unproductive rural land that is restricted and bounded by the existing urban area, Te Awa Kairangi Hutt River, and Akatarawa Forest. New internal public roads will be constructed and vested in the Council, designed to provide safe and efficient connectivity. Comprehensive threewaters infrastructure will be installed and vested to Council, ensuring long-term servicing capacity and resilience.

The Project will deliver significant benefits for the Greater Wellington region and, consequently, referral of the Project will achieve the purpose of the FTAA. Total direct employment over the development period is estimated at 318 FTE years; a substantial uplift in housing supply, including development of 162 new homes; ecological restoration of natural inland wetlands; and enhanced public access to the Akatarawa Forest Regional Park, providing recreational trail access. Overall, these elements cumulatively deliver regionally significant benefits across housing, the environment, infrastructure, and the economy.

The Project requires several approvals under the RMA 1991, including resource consents under the NES-Freshwater, the NRP (including PC 1), and the District Plan. A permit under the Wildlife Act 1953 may be sought, as potential lizard habitat (localised scrub margins and boulder fields) has been identified across the Project Site. Concession is required under the Reserves Act 1977 to connect drainage, and an off-road recreational asset/foot track on a piece of land that the Council owns, and that is subject to the Reserves Act.

The Applicant and its representatives have notified the required entities under s 11 of the FTAA 2024 before lodging this referral application. The Applicant has previously lodged consent applications with

Council and Regional Council relating to the Project, during which extensive consultation with both local authorities was conducted. Prior to submitting this application, the Applicant had undertaken pre-application consultation with the Regional Council, Council, Taranaki Whānui ki Te Upoko o Te Ika, Te Āti Awa, Ngāti Toa Rangatira, Muaūpoko, Rangitāne o Wairarapa, Rangitāne o Tāmaki nui-ā-Rua, Transpower NZ Ltd, NZ Transport Agency Waka Kotahi, Heritage New Zealand Pouhere Taonga, Ministry for the Environment, Department of Conservation, Wellington Water Ltd, Wellington Electricity Ltd and Chorus.

The way in which the consultation with these parties has informed the Project is described in detailed in the Consultation Report prepared by Wikaira Consulting (**Consultation Report**) (Appendix 18).

In addition to the **Consultation Report**, the following supporting technical assessments of the Project have been prepared for this referral application:

- An **Economic Impact Assessment** prepared by Property Economics Limited addressing the significant regional economic benefits of the Project (**EIA**) Appendix 4: Property Economics Ltd (01/06/26) Economic Impact Assessment (52602). Pages: 28.
- **Ecological investigations** that describe on-site habitat values, including wetland delineation and provide a preliminary assessment of the ecological effects of the Project on the Sites prepared by Boffa Miskell for the East Block Site (**Boffa Miskell Ecology Report**) (Appendix 5) and Blue Green Ecology Limited for the West Block Site (**Blue Green Ecology Report**) (Appendix 11).
- A **Geotechnical Assessment** prepared by Engeo Limited confirming the geotechnical suitability of the Sites for the Project (**Geotechnical Assessment**) Appendix 6: Engeo Ltd (08/05/26). Cannon Point Stage 3 Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 176. and Cannon Point Stage 4 - Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 227.
- A **Civil Infrastructure Report** prepared by Vecta Ltd (**Civil Infrastructure Report**) detailing the proposed threewaters network, the provision of electricity and telecommunication utilities, and the risks of flooding to and resulting from the Project. The Civil Infrastructure Report also contains earthwork design plans. Appendix 7: Vecta Ltd (12/06/26). Civil Engineering Plans Design for Approval (26014). Sheets: 19, reference 26014, and Civil Infrastructure Report (17/06/26). Pages: 77.
- **Architectural plans** depicting proposed housing typologies and allocation Appendix 8: Aymac Architecture Ltd (09/06/26). Plans. (2409). Sheets: 156.
- A **landscape and visual effects** assessment of the Project (**LVEA**) Appendix 9: BLAC Ltd (25/06/26) Landscape and Visual Effects Memorandum for Fast Track Referral: Cannon Point Road, Totara Park, Upper Hutt (Stage 3) and 4 Colorado Road, Upper Hutt, New Zealand (Stage 4). Pages: 26.
- A **Transport Assessment** prepared by TTAP addressing the traffic effects of the Project (**Transport Assessment**) : TTAP (23/06.2026). Transport Impact Assessment. Reference NZ20250430-01-102. Pages: 82.

Referral of the Cannon Point Development under the FTAA 2024 will facilitate an efficient and timely consenting pathway, while reducing unnecessary process duplication and associated costs. The Project is expected to deliver significant regional and local benefits, including additional housing supply and supporting infrastructure. On that basis, the Project is considered eligible for referral under the FTAA 2024.

1.0 Introduction

This Referral Application has been prepared on behalf of Cannon Point Development Ltd for its proposed development at 4 and 61 Colorado Road, Tōtara Park, Upper Hutt. This report has been structured to comprehensively address all relevant requirements of subpart 1 of the FTAA 2024, as follows:

Section 2.0 of this report addresses Site Context, responding to s 13(4)(d) of the FTAA 2024.

Section 3.0 sets out the Description of Project, addressing s 13(4)(a).

Section 4.0 covers the Proposed Approvals Required and responds to s 13(2)(d). Section 4.0 further responds to s 13(4)(t), which requires a statement of any activities involved in the project that are prohibited activities under the RMA 1991.

Section 5.0 sets out that the project is a development project that will have regionally significant benefits, responding to ss 13(4)(b) and 22(1)(a).

Section 6.0 addresses the *facilitation of a timely and cost-effective process*, responds to ss 13(4)(b) and 22(1)(b), which require that referring the project to the fast-track approvals process would facilitate the project, and is unlikely to materially affect the efficient operation of the fast-track approvals process.

Section 7.0 provides the Assessment of Environmental Effects in response to s 13(4)(h). Section 7 relies on the work of other experts in making those conclusions.

Section 8.0 addresses Statutory Documents, responding to ss 13(4)(y)(i) and Clause 2 of Schedule 5 of the FTAA 2024.

Section 9.0 sets out the Consultation Summary, responding to s 11(1)(a)-(b), s13(4)(j)-(o), and the work presented in the Consultation Report.

2.0 Site Context

In accordance with section 13(4)(d) of the FTAA 2024, section 2 provides a description and map of the entire project area, identifying its boundaries in sufficient detail to enable consideration of the referral application. The Project is described in Table 1 and Figure 1, below.

East and West Blocks are owned by the Cannon Point Developments Ltd; this describes the Applicant's legal interests in the Project Site (s 13(4)(s)).

2.1 Project Site Description

The Project Site comprises two blocks of undeveloped ('greenfield') rural residential land situated directly on the northern edge of the existing Tōtara Park urban area (shown on Table 1, Figure 1 below):

1. West Block Site is located at 4 and 61 Colorado Road (Lots 3 and 4 DP 306632, Lot 1000 DP 598401).
2. East Block Site is located at 2 Colorado Road (Lot 2001 DP 588152).

The two blocks (West Block Site) and East Block Site) are separated by the already-consented Stages 1 and 2 of the Cannon Point development. Stage 1 is complete and occupied, while Stage 2 is currently under development.

The Project Site is bounded to the north by Akatarawa Forest Park (zoned General Rural) and to the south by a mix of rural lifestyle and low-density residential properties. The boundaries to the east and west of the respective Blocks, along with their specific features, are described below. To the east by a City Council esplanade reserve running alongside Te Awa Kairangi Hutt River, and to the southwest by a City Council drainage reserve containing the Haukāretu Stream (Council Asset SWCH000133) which is in part an open, concrete, stormwater drain fed by multiple SW mains servicing the existing Tōtara Park urban area. The Haukāretu Stream eventually discharges into Te Awa Kairangi Hutt River after flowing through land owned by the Regional Council, which is reserved for river protection and soil conservation and is currently used for grazing horses.

Both the East Block and the West Block comprise a mix of pasture, regenerating scrub, and steep escarpment margins typical of this part of the Western Hutt Valley Hills and are currently used for low-intensity grazing. Although zoned rural, their elevated positions on river terraces above the valley floor have historically restricted development, and they now represent a remnant of Tōtara Park's rural past no longer used for productive purposes. Refer to Figure 2 below for the approximate location of both areas in relation to major transport links and surrounding services and amenities.

Key features within the surrounding environment include the Tōtara Park village centre, the Tōtara Park Bridge, and the Upper Hutt City Centre. The following distances and drive times to these features were measured from the main access point into the site at the Colorado Road/Harford Crescent intersection, using Google Maps. The Tōtara Park village centre is located approximately 1 km to the south (a 2-minute drive). It serves as a local hub offering a variety of services, including a school, a kindergarten, a post office, a grocery store, and eateries. The Tōtara Park Bridge, which provides the only road access to Tōtara Park, is located approximately 1.5 km away (a 3-minute drive). The Upper Hutt City Centre is located approximately 3.4 km to the south (a 6-minute drive) across Te Awa Kairangi Hutt River. It contains a broad range of commercial, hospitality, retail, and community amenities, including supermarkets, medical centres, churches, and entertainment venues.

2.1.1 West Block

The West Block development footprint covers approximately 4.06 ha at the western end of the wider Cannon Point Development area. It spans three parcels of land (Lot 1000 DP 598401, Lot 3 and 4 DP 306622) and is bounded by the Akatarawa Forest to the north and a City Council-owned drainage reserve to the south. This drainage reserve contains the Haukāretu Stream (urban stormwater identifier UHCC_SWCH000133).

The completed Stage 2 area lies immediately to the east, through which primary access into the West Block will be provided via Colorado Road. To the west, West Block abuts the remaining balance of Lot 4 DP 306622, which will remain a mix of undeveloped, low-productivity farmland and regenerating native vegetation. West Block is almost entirely situated on an elevated river terrace between the hills of the Akatarawa Forest and the river flats on which the existing Tōtara Park urban area is located. This setting gives the development area an irregular, approximately rectangular shape that follows the contours of the river terrace.

Three small streams traverse the West Block, each flowing north out of the Akatarawa Forest. The westernmost stream flanks the development area's western edge and feeds a large marsh-type wetland on the valley floor, within river reserve land owned by the regional council. A second, ephemeral stream runs through the middle of the site, feeding a seepage-type wetland before flowing south into the City Council drainage reserve. This wetland sits on the river terrace at the convergence of two gullies and is likely associated with historic track formation or impeded flow paths, as set out in the Boffa Miskell Ecology Report. A relatively large gully system feeds the third stream. It flows along the boundary between the Stage 2 and West Block development areas before entering a seepage-type wetland within the Council's drainage reserve.

2.1.2 East Block

East Block is situated at the eastern end of the existing Cannon Point development area, covers approximately 8.7 ha, and is contained entirely within Lot 2001 DP 588162 (RT 1146505). It is bounded to the south by the existing Tōtara Park urban area, to the west by the completed Cannon Point Stages 1 and 2, to the north by the Akatarawa Forest, and to the east by Te Awa Kairangi Hutt River. Access is provided from Colorado Road to the east, which connects to California Drive via either Tacoma Drive or Hartford Crescent.

No. 61 Larchmont Grove (Lot 6 DP 46315), located at the northern end of the Larchmont Grove cul-de-sac, is anticipated to be used for a future road extension into the East Block Site. The Council owns this allotment but is not held for roading purposes.

The East Block Site encompasses both a river terrace and the river flat at the foot of the terrace. The terrace is most prominent in the western portion of the Site, narrowing as it approaches the Hutt River. The Transpower NZ Ltd National Grid traverses East Block from west to east and is shown as a bold yellow line on Figure 1: Site Location Plan (Source: Derive).

One small stream flows through the East Block Site, originating in the Akatarawa Forest to the north. It traverses the western edge of the East Block Site near 45 Hartford Crescent before entering the Council's piped stormwater network and eventually discharging into the Haukāretu Stream (UHCC_SWCH000133), to the south of the West Block area. A small seepage-type wetland has been identified at the foot of the river terrace immediately to the west of this stream.



Figure 1: Site Location Plan (Source: Derive)

Table 1: Parcels subject to this application

Development Area	Address	Legal description	Record of title	Owner	Area (ha)	Purpose
East Block (Stage 4)	4 Colorado Road, Tōtara Park, Upper Hutt	Lot 2001 DP 588162	1146505	Cannon Point Development Limited	8.4544	Residential development
West Block (Stage 3)	61 Colorado Road, Tōtara Park, Upper Hutt	Lot 1000 DP 598401	1160734	Cannon Point Development Limited	6.02	Residential development
West Block (Stage 3)	-	Lot 3 DP 306622	25850	Cannon Point Development Limited	6.2861	Residential development
West Block (Stage 3)	-	Lot 4 DP 306622	25850	Cannon Point Development Limited	14.12	Residential development
Upper Hutt City Council Local Purpose Reserve	-	Lot 6 DP 46315	912278	Upper Hutt City Council	0.0471	Road connection
Upper Hutt City Council Reserve Local Purpose Reserve	2 Colorado Road, Tōtara Park, Upper Hutt	Lot 301 DP 588162	1137297	Upper Hutt City Council	0.297	Stormwater infrastructure (pond)
Upper Hutt City Council Local Purpose Reserve	-	Lot 2 DP 52931	WN43B/53	Upper Hutt City Council	0.51	Stormwater connection (trench)
Upper Hutt City Council Local Purpose Reserve	-	Lot 1 DP 54694	WN25B/619	Upper Hutt City Council	1.2632	Wastewater connection (trench)

Each Record of Title, and the interests registered against it, is assessed in Appendix 2; this describes the Applicant's legal interests in the Project Site (s 13(4)(s)) and how those interests will affect the ability to undertake the Project.

Some of the Project Site is owned by Council, and consultation with Council has been ongoing for 5+ years, and specifically for this Referral application since April 2026.

3.0 Description of Project

In accordance with section 13(4)(a) of the FTAA 2024, this section provides a description of the project and the activities it involves.

3.1 Background

The development of the wider Cannon Point Area has been ongoing since 25 February 2020, when Council granted subdivision consent RM2010109 for Stages 1 and 2. The subdivision and land development for both Stages 1 and 2 are complete, with all Stage 1 dwellings finished and Stage 2 dwellings currently under construction. When fully complete, Stages 1 and 2 will provide a total of 46 residential lots.

An application for resource consent was made to both the Greater Wellington Regional Council (the 'Regional Council') and the Upper Hutt City Council (the 'Council') for the residential land development and subdivision within the East Block area on 20 December 2024. The Regional Council granted regional consent WGN250152 to Cannon Point Developments for earthworks and stormwater discharge on 24 June 2025. The application RM2410147 to Council was made in anticipation of Plan Change 50 Rural Review (PC50), which included amendments that would upzone the site from general rural to general residential. Earthworks application RM2510117 was made to Council on 12 September 2025 to authorise enabling earthworks to allow the Applicant to give effect to the regional consent WGN250152 and start preliminary earthworks in the 2026 Summer earthworks season.

The initial application relied on a consenting pathway provided by the anticipated zoning under PC50, as the rezoning of the East Block area was seen as a 'logical extension' of the Tōtara Park suburban area, with the proposed density to be the same or similar to that found elsewhere in Tōtara Park. The Applicant and Upper Hutt City Council were working through a third round of further information requests under s92(1) of the RMA when Council resolved to withdraw PC50 on 10 December 2025 due to the uncertainty caused by the ongoing reform of the RMA, and the significant financial implications and legal risk of continuing the plan change.

The Applicant has made a significant investment in preparing the material required for Consent Applications to both Council and the Regional Council for the West Block, including commissioning a civil engineering plan, a scheme plan, infrastructure, threewaters reports, and architectural housing typology design. Application for subdivision and residential land use for Stage 3 (West Block) was not lodged due to the Applicant receiving pre-application advice from the Regional Council on 26 September 2024 where it was stated Greater Wellington did not see a consenting pathway under Regulation 45C of the National Environmental Standard for Freshwater while the Stage 3 area was still under its operative zoning of Rural Lifestyle and General Rural, as described within section 2.

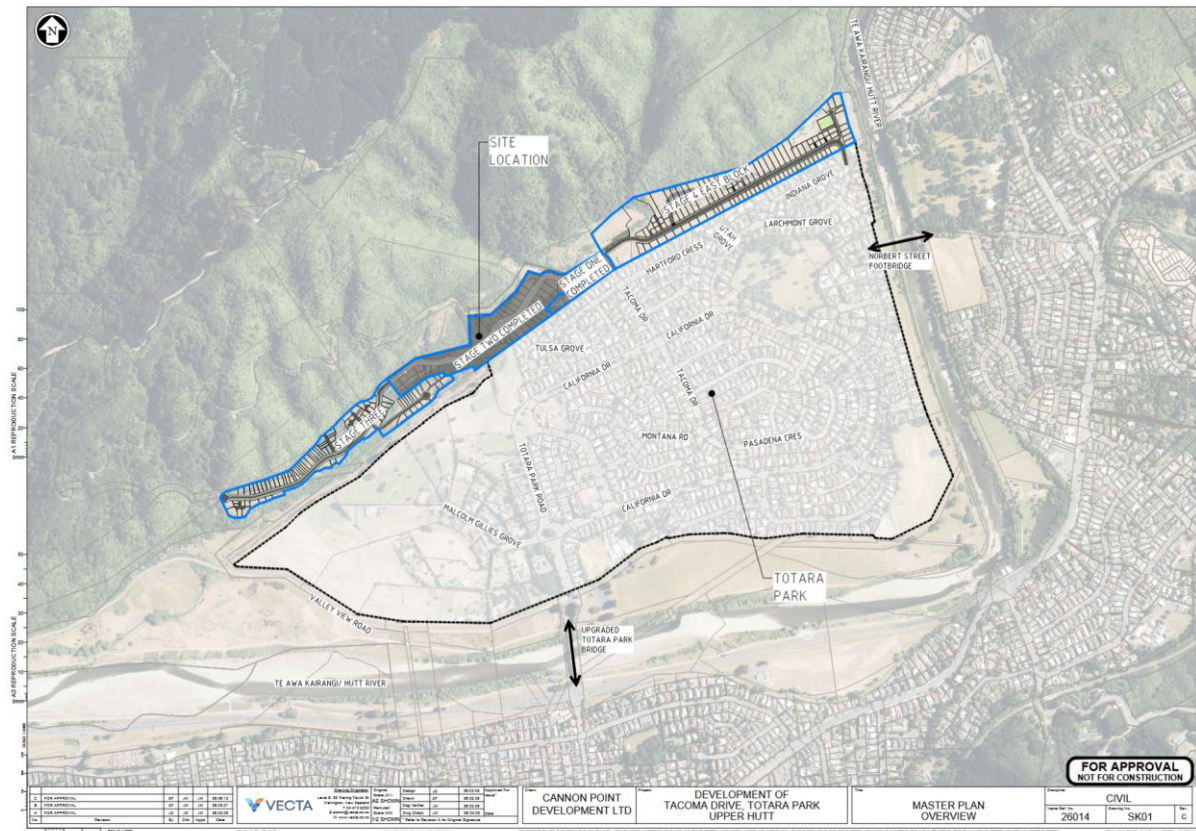


Figure 2: Master Plan showing Whole-of-Development (Source: Vecta)

3.2 Overview

The Project consists of East and West Blocks of the Cannon Point Development and will construct 162 new dwellings and 2 commercial buildings; along with the subdivision of 188-lots, of which 162 will be used for residential development, two will be used for a centrally located small commercial precinct, and two will be kept as balance allotments. The remaining 22 lots will be used as roads, and communal reserve areas designed to accommodate enhanced wetland areas or engineered raingardens to provide stormwater treatment and retention for the wider development. The new dwellings will be set within a logical, well-connected and aesthetically pleasing living environment as set out within the Architectural Site Plan (refer Appendix 8). The Projects covers both land use and subdivision.

The Project has been designed with expert input from Vecta Ltd (Civil engineering and spatial planning), BLAC (landscape and urban design), Boffa Miskell and Blue Green Ecology (Ecology), Engeo (Geotech), TTAP Transport (transport), Aymac Architecture (Architecture), Wikaira Consulting (Consulting and engagement) and planning from Derive Consulting Group Ltd. The referral application is the result of 6+ years of consultation and design, derived from past applications made to both Council and Regional Council under the RMA (1991). The expert assessments have shaped the Project into a form that utilises the natural environment, ecology and landscape values characteristic of the Project Site to offer a logical well-connected extension of the existing urban environment to Upper Hutt City.

The key elements of the Project are outlined within the Masterplan (refer to Appendix 3), and include:

- Construction of 162 standalone homes.
- Subdivision of the land to provide 188 allotments for residential and commercial development, road development, landscape and drainage reserves.
- Development and enhancement of open space areas, reserves, walking trails, biking paths, and urban amenities as shown in the Appendix 10: BLAC Ltd (05/06/26) Cannon Point - Stage 3 and 4 -Landscape Strategy. Pages: 22.
- Significant restoration and enhancement associated with existing areas of native vegetation (Refer to Appendix 9: BLAC)
- Development of supporting infrastructure, including roading improvements, three water and telecommunications and electricity.

If the Project is successfully referred and consent is obtained, the approximate commencement and completion dates for construction activities are:

- Expected commencement date: 01 October 2027.²
- Expected completion date: 01 October 2032.

The Project is not planned to proceed in stages (section 13(4)(f) of the FTAA) and is not proposed as an alternative project (section 13(4)(g) of the FTAA).

² Detailed design and engagement will start immediately, 1 October was chosen as the start of the summer earthworks season.

3.3 The Project

3.3.1 Housing typology and subdivision design

The Project seeks to contribute to and improve housing supply in Upper Hutt City by offering low-density residential development across a variety of typologies, located within a logical and coherent extension of the existing urban area. As a Tier 1 Local Authority under the National Policy Statement on Urban Development, Upper Hutt is nationally recognised as a high-growth area. The Project will contribute toward supplying that demand and achieving the housing targets set in the RPS. The Project provides a diverse range of lot sizes and building forms that respond to the site's topography, natural hazard constraints, and natural landscape features. The typologies are high-quality and designed to suit the varying characteristics of each lot. According to MDRS design controls and urban design guidelines, they will ensure good levels of on-site amenity and integration with the surrounding environment. The site plans (Appendix 8) illustrates the range of housing typologies proposed for the proposed 162 residential allotments, with the lot sizes varying in size from 176 m² to 946 m², along with two commercial allotments and three balance allotments.

The Project is planned to promote low-carbon transport options by establishing pedestrian accessways and communal green spaces. The incorporation of two commercial lots will further reduce the development's long-term carbon footprint by creating space for local businesses to offer services within walking or cycling distance of the surrounding Cannon Point community.

3.3.2 Landscaping and Ecological Enhancement

Landscaping

The unique river terrace topography of the existing Cannon Point development has resulted in dwellings being clustered linearly along the flat land on either side of the roadways. The residential lots are relatively densely clustered to utilise the flat land. This is intended to both mitigate the visual impacts of the development and to avoid areas more susceptible to natural hazards. The site plan prepared by Aymac (2026) presents a land development including dwellings and subdivision in keeping with the topography and surrounding landscape values by incorporating large areas of undeveloped land and vegetation (Appendix 8).

BLAC Limited prepared the Landscape Strategy which presents a high-level, coordinated vision for the Project by recommending the establishment of landscape planting measures that support positive outcomes for the neighbourhood and future residents (**Landscape Strategy**) Appendix 10. The Landscape Strategy presents specific landscape designs for several focus areas to highlight key landscape responses for distinct parts of both the West and East Blocks. The Landscape Strategy recommends a range of vegetation and amenity measures to enhance the landscape aspects of the Project, including:

- Native revegetation on batter faces,
- The enhancement of existing wetland areas and constructed rain gardens,
- Screen planting using native species,
- The establishment of native trees within the vested road reserve, and
- Public access enhancements such as trail connections.
- Amenity enhancements such as seating and play equipment.

Together, the Master Plan (Figure 2) and Landscape Strategy (Appendix 10) propose an urban form that will create a unique living environment by incorporating several intentionally landscaped communal areas and large areas of revegetated hillslopes in areas unsuitable for development.

Ecological Restoration

The distinctive location of the Project Site (and the wider Cannon Point development area) on the southern edge of the expansive Akatarawa Forest presents a unique opportunity to enhance both the amenity of the proposed residential area and the ecological value of the surrounding area through the implementation of strategic ecological enhancement actions.

It is proposed to incorporate specific ecological enhancement actions as part of the Project including:

- Establishment of 5 metre native vegetated buffers alongside identified streams/ overland flow paths.
- Enhancement of existing native riparian vegetation through noxious weed removal and supplementary planting.
- Establishment of native vegetated buffer along the boundary of existing residential lots that abut the East Block.
- Ecological enhancement of wetland areas through noxious weed removal and supplementary planting.
- The retention of existing native vegetation within 5 metres of waterways unless vegetation clearance is specifically required due to earthworks.
- The replacement of existing culverts with bottomless arch culverts to enhance fish passage and restore instream values.
- The vesting of approximately 4 ha of vegetated hill slope land immediately above the West Block.

While the earthworks required for the establishment of the Project will result in the loss of existing vegetation and stream extent, it is expected that these effects can be effectively managed through the incorporation of specific ecological actions as listed above, and the application of the effects management hierarchy.

3.3.3 Subdivision and infrastructure

The following section sets out the subdivision and infrastructure requirements of the development. This is shown in Appendix 3: Real Time Survey Ltd (15/06/26). Scheme Plans J2600090 SC-WEST-01 and J2600090 SC-East-01. Sheets: 18.

Subdivision

The Project will create 188 fee-simple allotments comprised as follows:

- 162 residential allotments.
- 2 commercial allotments.
- 9 road reserve allotments.
- 12 other reserve allotments (excl. road)
- 3 balance allotments.

The Project will create 9 roads, of which six (6) are to be vested upon deposit in Council as the relevant TLA. This figure excludes privately-owned ROW.

The Project will create 96,322 m² (9.6322 ha over 18 allotments) of reserve land to vest upon deposit to Council (as the TLA). This figure excludes Lot 301 DP 588162 as that already is owned by Council.

No esplanade reserve is required or proposed.

Appendix 17 is a register of allotments, including a schedule of reserves.

Roading and Access

The Project will involve the construction of nine (9) new roads, vested in Upper Hutt City Council; these are listed in Appendix 17: and shown on Civil Plans C500 (Vecta Ltd, 2026) (Appendix 7).

The primary access routes to the Project Site from State Highway 2 (SH2), is via the Tōtara Park Road Bridge and the two nearby roundabouts California Drive/ Tōtara Park Rd Roundabout North and California Drive/ Tōtara Park Rd Roundabout South, all of which are along the critical route leading into and away from the Project linking the Project to key destination such as Upper Hutt CBD, Wellington City, Lower Hutt, Porirua and other regional centres.

The roading and access for the Project is summarised as follows:

- Access to the east end of the West Block Site will be achieved as an extension of Colorado Road. Note there is no exit at the west end of West Block Site.
- Access to the west end of East Block Site will be achieved from Colorado Road.
- Access to the east end of East Block Site is proposed through Larchmont Grove via Lot 6 DP 46315 (Council property).
- A new urban standard³ T-intersection onto Colorado Road will be constructed to provide access to the East Block Site.
- On both Blocks, Road 1 will have a 1.5 m footpath on each side of the carriageway.
- On the East Block, Road 2 will have a 1.5 m footpath on both sides of the carriageway; on West Block, Road 2 will contain a single footpath to avoid the natural inland wetland.
- Internally, both Blocks will be served by a road with a carriageway approximately 15 m wide (5.5 m vehicle bay plus parking, berm, and footpath) extending from the westernmost point of the west block development, and east to the end of Larchmont Grove.
- On East Block, Road 1 includes installing an open-bottom roading culvert around chainage CH80 to CH90.
- On West Block, Road 1 includes installing an open-bottom roading culvert around chainage CH840.

Table 2: Roding layout of the Project.

Road-ID	Length (Approx) in m	Width (Approx) in m	Allotment id	Allotment area	Ownership
East Block (Stage 4)					
Road 1	760	15	Lot 500	11,523 m ²	Vest in TLA
Road 2	55	9	Lot 501	481 m ²	Vest in TLA
Road 3	80	9	Lot 502	1148 m ²	Vest in TLA
Road 4	55	4.5	Lot 505	196 m ²	Private

³ Standard meaning that standard set in the Upper Hutt Code of Practice.

West Block (Stage 3)					
Road 1	600	15	Lot 100	8994 m ²	Vest in TLA
Road 2	180	9	Lot 101	1897	Vest in TLA
Road 3	80	3.4	Lot 103	283	Vest in TLA
Road 4	50	9	Lot 109	427	Private
Road 5	55	4.7	Lot 110	337	Private
JOAL/ROW (x3)	40	3.5	ROW	ROW	Private

Tōtara Park is currently served by Bus Route 111, which connects the Tōtara Park area to central Upper Hutt. The closest bus stop to the East Block is Stop 8505, located on California Drive at Tacoma Drive.

Threewaters

Extensive threewater infrastructure is proposed to be built across both Blocks and will be vested in Council as described in detail in the Civil Infrastructure Report at (Vecta, 2026) Appendix 7 and summarised below.

Wastewater (West Block)

Wastewater from the West Block will drain by gravity down Roads 2 and 3, and traverse (via trench) the Council Recreation Reserve Lot 1 DP 54694. The trench will be backfilled and grassed. This wastewater main will be vested in Council or Tiaki Wai. The main will be constructed by the Applicant and vested in Council.

Wastewater (East Block)

Wastewater from the East Block will be discharged to Council's reticulated network via two systems. The western quarter of the East Block will discharge to an existing manhole located at the East Block Site's western boundary under Colorado Road. The eastern three-quarters of the East Block will drain to an existing manhole located under the turning head at the end of Larchmont Grove. The proposed public drain ranges from 150 mm dia to 225 mm dia, and will be vested in Council.

Stormwater (West Block)

Stormwater from the West Block will ultimately be discharged from the West Block Site to the main stem of Te Awa Kairangi/ Hutt River by way of Haukāretu Stream (UHCC_SWCH000133) located immediately to the south of the development area. Runoff from the road reserve will be treated by directing flows to a large rain garden located at the downstream end of the network before discharging to Haukāretu Stream (UHCC_SWCH000133) via a riprap stormwater outlet (See Vecta Plan C350) (Appendix 7). Stormwater from new roof areas will be captured and treated by a detention tank in line with Wellington Water *Approved Solutions for Managing Stormwater Runoff*. A new rain garden is proposed on the lower portion of the West Block Site (Lot 506) to treat road impervious surfaces.

Across West Block, there are four forested catchments that drain the forested hill country immediately to the north of the West Block. With reference to Plan C360:

- Catchment G1 will be diverted around Lots and the rain garden to remain connected to Haukāretu Stream (UHCC_SWCH000133).
- Catchments K, J, H will be piped under the development to carry clean water from the forested slopes to the Haukāretu Stream (UHCC_SWCH000133).

Stormwater (East Block)

As is the case with wastewater, gravity drainage of stormwater requires a split approach. The western quarter of the East Block will drain by gravity to a rain garden on Lot 301 DP 588162; the eastern three-quarters of the East Block will drain by gravity to a new rain garden on Lot 506 (See Plan J2600090 SC EAST-04 Appendix 3 and Plan C330, Appendix 7) and eventually to the main stem of Te Awa Kairangi Hutt River. Runoff from the road reserve will be treated by directing flows to a rain garden at the downstream end of the network before discharging to Te Awa Kairangi Hutt River via two riprap stormwater outlets. Runoff from the 30ha of bush uphill (Catchments 1-5) of the East Block currently flows over the East Block Site via sheet flow towards the existing network in Tōtara Park; this will be captured by the road and kerb drainage and directed towards Te Awa Kairangi via new raingardens at each end of the East Block. The small stream (Catchment 6) at the western end of the East Block will be conveyed under Road 1 via a new, open-bottom culvert. Runoff from residential lots will be attenuated using a detention tank in line with Wellington Water *Approved Solutions for Managing Stormwater Runoff* issued as consent notices on the titles. Rainwater collection and reuse will provide additional storage and attenuation, benefiting water quality; this will be secured by way of consent notice on the title of each residential and commercial allotment.

Potable water (West Block)

Potable water will be provided to each allotment of West Block from an extension of Colorado Road. See Vecta Plan C400 (Appendix 7).

Potable water (East Block)

The plan for East Block is to construct a 'ring' network from Colorado Road to Larchmont Grove. With regard to water supply, the network constructed in Stage 1 (Colorado Road) and the existing network at Larchmont Grove will be extended to include a 200 mm principal main, with DN50 rider mains, to provide water supply and firefighting service for the East Block development, in compliance with the relevant standards. Details of the potable water supply are presented in the Civil Infrastructure Report.

Power and Telecommunication

There are existing overhead lines owned by Wellington Electricity that traverse both the East and West Blocks. These lines enter the East Block from across the Hutt River via the end of Black Beech Street in Birchville. It is proposed that these lines will be brought underground as they pass through the development. Post development the electrical and telecom conduits will be located under the road corridor to avoid conflicts with private property.

Utilities, including electricity, natural gas, and telecoms (including UFB), will be installed for each residential allotment.

Earthworks

Earthworks will be undertaken to establish building platforms and physical access on the Project Site. Earthworks will occur over one summer earthworks season. The nature and scale of works proposed in association with this referral application are broadly consistent with those already undertaken for Stages 1 and 2 of the development. The earthworks will occur progressively and will primarily involve vegetation clearance, road corridor formation, drainage and trenching for services, building platform formation, and localised modification of existing tracks and slopes.

The earthworks required to establish the West Block will involve excavating approximately 15,938 m³ of soil and placing approximately 25,611 m³ of fill. Earthworks will occur to a maximum cut and fill depth of 7 m.

The earthworks required to establish the East Block will involve excavating approximately 85,150 m³ of soil and placing approximately 94,222 m³ of fill. Earthworks will occur to a max depth of 17 m and max fill of 9 m. The earthworks required to establish the East Block are greater due to the development area's larger size and topography.

The parameters of the earthworks are set out below in the following table:

Table 3: Proposed Earthworks associated with the Project.

	Volume (m ³)	Area (m ²)	Mean depth (m)	Max depth (m)
West Block				
Cut	15938	13951	1.14	7
Fill	25611	21807	1.17	7
Sum	9673	35758	-	-
East Block				
Cut	-85150	26948	-3.16	17
Fill	94222	38452	2.45	9
Sum	9072	65400	-	-

The earthworks will enable a new road through the middle of both the East and West Blocks, with building platforms on each side of the road. The earthworks will also include the installation of drainage, and erosion and sediment control measures. Earthworks will be undertaken progressively in a series of stages to ensure that the amount of open ground at any one time is minimised and is remedied as the works progress.

4.0 Proposed Approvals Required

Per s 13(4)(y), the proposed approvals include an approval described in section 42(4)(a) (resource consent and an approval described in section 42(4)(e) (concession).

4.1 Resource Management Act 1991

In accordance with section 13(4)(t) of the FTAA 2024, this section outlines the types of consents, certificates, designations, concessions, and other legal authorisations that the applicant considers are needed to authorise the Project.

A full assessment of all plan rules and NES regulations is presented in Appendix 15.

4.1.1 National Environmental Standards

Section 8 of this report presents a comprehensive assessment of all relevant National Environmental Standards. That assessment concludes that resource consent is required under the NES-F for urban development adjacent to a natural inland wetland.

At the time of any substantive application for resource consent under FTAA 2024, applications are likely required in respect of the following provisions of the NES-F:

- Restoration of natural inland wetland (Regulation 38C);
- Construction of a structure, including any boardwalk or culvert (Regulation 42);
- Urban development (Regulation 45C);
- Works within 100 m of a natural inland wetland (Regulation 52);
- Vegetation clearance, earthworks, or land disturbance within 100 m of a natural inland wetland (Regulation 54);
- Reclamation of the bed of a stream or river (Regulation 57);
- Permitted culverts (Regulation 70); and
- Consented culverts (Regulation 71).

No resource consent is required under the NES-CS or any other NES.

4.1.2 Natural Resources Plan for the Wellington Region 2023

The Natural Resources Plan (NRP), alongside Plan Change 1 (PC1), regulates earthworks in the Te Awa Kairangi catchment. A full planning context is set out below.

Earthworks

Earthworks are classified as a permitted activity in the Te Awa Kairangi catchment under NRP PC1 Rule WH.R23, subject to compliance with the standards set out in that Rule. The total combined earthworks area for the East and West Blocks is 101,158 m²; therefore, it is a Restricted Discretionary Activity under NRP PC1 Rule WH.R24 and is subject to the following performance standards:

- The concentration of total suspended solids (TSS) can be made to comply with the standard.
- Earthworks will not occur between 1 June and 30 September in any year (i.e. no winter works).

Any ancillary vegetation clearance as part of earthworks does not occur on high-risk erosion land and therefore does not trigger Rules WH.R17 or WH.R18, subject to confirmation being made in any future Substantive Application.

Stormwater

The creation and redevelopment of impervious surfaces generate stormwater, which PC1 regulates to mitigate adverse effects on water quality and the environment's life-supporting capacity.

- There are two new stormwater discharges proposed under this development. The first is the clean water diversion for both development areas to intercept stormwater from the up-slope environment to the north of the subject site, which would typically run off the vegetated hill country. This clean stormwater will be intercepted and discharged into Te Awa Kairangi via one of two methods. For Stage 4 East Block, this sheet flow will be picked up by the kerb and channel of Road 1 and conveyed to the rain garden and ultimately Te Awa Kairangi Hutt River. Secondly, stormwater from Stage 3 West Block will be directed to an on-site rain garden, then on to the Haukāretu Stream (UHCC_SWCH000133).

NRP-PC1, operational stormwater discharges from unplanned greenfield development. This rule has a prohibited activity status under PC1 as notified. However, under s87B of the RMA, a rule must be treated as a discretionary activity if the proposed plan describes the activity as prohibited and the rule has not yet become operative. As such, consent is required as a discretionary activity under WH.R13.

NRP Rule R49 provides for the discharge of stormwater from new urban development associated with earthworks, up to a total area of 3,000 m² per property per 12-month period. The earthworks associated with the development of both the East and West Block will exceed 3,000 m² per property per 12-month period; therefore, the activity is a restricted discretionary activity pursuant to R50 of the NRP.

Culverts

The proposal includes the placement of 4 bottomless arch culverts within the West Block and 1 within the East Block. These culverts will convey overland flow beneath the new access roads. The relevant rule is NRP Rule R126, which is not replaced by PC1.

The proposal will not comply with the standards of R126(i)(iii) as the width of the five proposed culverts will not comply with the maximum permitted width of 1.3 m to ensure that they can adequately convey flows without choking.

Land use consent is required under NRP Rule R145 for non-compliance with R126(i)(iii).

Wetlands

NRP Rules R113 - R121 regulate activities within wetlands. The activities proposed under this referral application would not comply with Rule R118, which specifically restricts the take, use, damming or diverting of water into, within, or from the natural wetland, or the take and use of water within 50 m of the natural wetland. However, regulations 52, 53 and 54 of the NES-FW Regulations 2020 prevail over R118(a) and (b). The wetlands within the Project Site are not identified as outstanding natural wetlands under the NRP.

In this case, the regulations of the NES-FW 2020 prevail over the provisions that apply to activities within or adjacent to wetlands within the NRP.

4.1.3 Rules Assessment - Upper Hutt Operative District Plan 2004

The Upper Hutt District Plan (the **District Plan**) regulates residential land development and subdivision in the rural zones. In brief, a comprehensive consents package will be sought. An assessment is provided below. Appendix 15 to this application contains a list of all relevant rules and NES regulations.

The East Block is in the General Rural Zone (**GRUZ**) and is subject to a slope hazard overlay.

The West Block is split between the General Rural Zone (**GRUZ**), Rural Lifestyle Zone (**RLZ**), and Open Space Zone. West Block 3 is subject to the following District Plan features, overlays:

1. Slope Hazard Overlay.
2. Transpower HVTL overlay (note: this is not a designation).
3. Wellington Fault Band (poorly constrained, and constrained).
4. 100-year flood extent.

The likely resource consents that are likely to be required to authorise the Project are set out in Appendix 15 and are detailed below:

District-wide Matters: Subdivision

Subdivision is classified as a controlled activity in the GRUZ and RLZ under District Plan Rule SUB-RUR-R1, subject to compliance with standards set out in SUB-RUR-S1 and SUB-RUR-S2. Any non-compliance would trigger the RDA Rule SUB-RUR-R5. Compliance with the relevant standards cannot be achieved because the proposed development does not meet the minimum lot sizes of 20 ha (GRUZ) and 1ha (RLZ).

Consent will therefore be sought as a discretionary activity under Discretionary (unrestricted) Rule SUB-RUR-R11 for non-compliance with minimum allotment sizes in SUB-RUR-S1.

GRUZ General Rural Zone

Much of the proposed development area is within the General Rural Zone (GRUZ) under the District Plan. New residential dwellings are a permitted activity under District Plan Rule GRUZ-R4, subject to compliance with standards set out in GRUZ-S1-S5. Any non-compliance would trigger the Restricted Discretionary Activity Rule GRUZ-R14.

Compliance with permitted activity rule standards S1 and S2 cannot be achieved because some lots rely on a JOAL for access, and most allotments are too small to meet the 12-metre front yard setback. Resource consent is also required under GRUZ-R15 for buildings or structures within 12-32 m of high-voltage transmission lines (HVTL, rated 110 kV or greater) as a restricted discretionary activity. Land use consent will therefore be sought for the following activities:

- To construct future dwellings with a non-compliant accessway under RDA Rule GRUZ-R16.
- To construct future dwellings with a non-compliant front yard setback under Rule GRUZ-R14.
- To construct future dwellings within 12-32 m of HVTLs under RDA GRUZ-R15.

For completeness, land use consent will not be sought under Rule GRUZ-R25 (dwellings within the national grid yard), but that will be confirmed after Referral and before any Substantive Application.

RLZ Rural Lifestyle Zone

The eastern portion of the West Block development area (Lots 1-4, 6, 9, and 72-97) is within the Rural Lifestyle Zone (RLZ). New residential dwellings are classified as a permitted activity in the RLZ under District Plan Rule RLZ-R4, subject to compliance with standards set out in RLZ-S1 to RLZ-S5. Any non-compliance would trigger the Restricted Discretionary Activity Rule RLZ-R14. Compliance with permitted activity rule standards RLZ-S1 and RLZ-S2 cannot be achieved due to non-compliance with the 20 m separation distance, as access and most allotments are too small for the 8 metre front yard setback to be achieved.

- To construct future dwellings with a non-compliant accessway under RDA Rule RLZ-R14.
- To construct future dwellings with a non-compliant front yard setback under RDA Rule RLZ-R12.
- To construct future dwellings within 12-32 m of HVTs under RDA GRUZ-R15.

For completeness, land use consent may not be sought under RDA Rule RLZ-R13, but that will be confirmed after Referral and before any Substantive Application.

District-wide Matters: Earthworks

Earthworks are classified as a permitted activity in the General Rural Zone under District Plan Rule EW-R1, subject to compliance with standards set out in EW-S1 to EW-S17. Any non-compliance would trigger the RDA Rule EW-R9. Compliance with permitted activity rule standards S2, S3, S5, and S10 cannot be achieved for the following reasons.

- EW-S2: Cut and fill will exceed 1.5 m, with the maximum cut depth of approximately 17 m. while the max fill depth is 9 m.
- EW-S3: The physical extent of the earthworks will exceed 150 m².
- EW-S4: Earthworks will be required within 10 metres of a waterbody within the Stage 3 development area to construct a culvert under the access road.
- EW-S10: Earthworks are proposed within 12 m of the HVTs but meet the conditions of the standard.

The proposed earthworks are, therefore, considered to be a Restricted Discretionary Activity under EW-R9 of the District Plan.

District-wide Matters: Transport and Parking

Permitted activities in the district are subject to rules and standards in the Transport and Parking Chapter of the District Plan. Compliance with permitted activity rule standards is assessed in the table below. Rules TP-R2, TP-R3, and TP-R4 do not apply to rural zones. The Project is associated with 'construction works which are part of a subdivision' and therefore is excluded from Rules TP-R5 and TP-R6.

Both Colorado Road and Larchmont Grove are classified as local roads in the TP-Schedule-1 Roding Hierarchy.

Compliance is not achieved with standard TP-S5 as the site is within the General Rural and Rural lifestyle zones, and not all lots will have on-site manoeuvring. There appear to be no other rules triggered.

District-wide Matters: Indigenous Biodiversity

Indigenous vegetation clearance up to 500 m² in total area on any one site that is not an Urban Environment Allotment and is not an identified Urban Tree Group listed in UTG-SCHED1, within any continuous 5-year period, is a permitted activity subject to meeting the standards under ECO-S1.

The criteria in ECO-SCH1 and ECO-SCH2 are not present on site. The site is not an Urban Environment Allotment. There is no Urban Tree Group identified in UTG-SCHED1 for the subject site.

The proposed area of vegetation clearance ~0.20 ha, which exceeds the permitted activity standard of 500 m² (0.05 ha).

The proposal is therefore considered a discretionary (unrestricted) activity under Rule ECO-R7

4.1.4 Existing Resource Consents

This section sets out whether any activities that are involved in the project, or activities substantially the same as those involved in the project (s 14(4)(u) FTAA 2024), have been the subject of an application or a decision under a specified Act, and:

- (i) if an application has been made, details of the application:
- (ii) if a decision has been made, the outcome of the decision and the reasons for it:

The activities involved in the project are similar to, but not substantially the same as, those authorised by resource consent WGN250152 which authorises stormwater discharge and earthworks for the development of East Block under a different scheme.

Regional Council

The Applicant holds a Resource Consent WGN250152 for earthworks and stormwater discharge on East Block. Resource Consent WGN250152 is a land use consent, under the Regional Plan. Resource Consent WGN250152 has been granted, but not given effect to. Resource Consent WGN250152 has not lapsed. Resource Consent WGN250152 relates to East Block but not West Block. Resource Consent WGN250152 has not been given effect to as the consent holder (Cannon Point Development Ltd) does not hold the district-level resource consent for the same activity. Resource Consent WGN250152 relates to this application in the way that it applies to East Block. Resource Consent WGN250152 and the Proposal relate to different scheme plans, earthworks volumes, stormwater generation.

At substantive stage, the applicant will either:

1. apply for all new regional consents and surrender WGN250152; or
2. apply for new regional consents for the West Block and change WGN250152 for East Block.⁴

The final option will be determined as design progresses, and before a substantive application is made, but the referral application addresses effects of (1) to cover the field.

The Applicant is consulting with the Regional Council under section 30(3)(a) of the FTAA 2024.⁵

⁴ Pursuant to section 127 of the RMA 1991.

⁵ Subject to Schedule 5, Clause 2 of the FTAA 2024.

Council

The Applicant has two live applications before Council, both of which will be withdrawn when the Substantive Application is lodged under the FTAA 2024:

- Application RM2510117 (Earthworks); and
- Application RM2410147 (Subdivision).

Application RM2410147 seeks consent to undertake subdivision and earthworks of East Block in a manner that aligns with granted Resource consent WGN250152.

Application RM2510117 seeks only the earthworks component of Application RM2410147.

These applications are on hold under s92(1) of the RMA 1991; they will be withdrawn if the Proposal becomes referred.

4.1.5 Prohibited activity status

The proposed discharge of operational stormwater is a prohibited activity under Regional Rule WH-R13, which has been notified and has immediate legal effect. While the activity is prohibited under PC1, in accordance with section 87B(1)(c), the status of the activity is discretionary because the prohibited rule is not yet operative.

4.2 Wildlife Act 1953

In the Boffa Miskell Ecology Report and the Blue Green Ecology Report, the authors note that suitable habitat exists in forest margins, boulder fields, and scrub margins for a variety of endemic lizard species, such as Northern Grass Skink, Copper Skink, Raukawa Gecko, and potentially at-risk arboreal geckos. The presence of Lizards in CPD Stages 1 and 2 was also assumed based on habitat availability.

The Boffa Miskell Ecology Report (refer to Appendix 5) infers that, based on habitat character, any at-risk species are likely to be present at very low densities due to the landscape's disturbance and lack of intact shrubland or forest. As of May 2026, further lizard surveys have been undertaken for 3 months, and this evidence will form part of any future Substantive application. If that survey finds evidence of lizards in areas within the Project Site that will be disturbed, a Lizard Management Plan will be developed and implemented in accordance with standard DOC-aligned procedures.

Due to the possibility of lizard presence even in low-quality habitats, which are common in modified environments, wildlife approval may be sought proactively to authorise any activities involving the capture, handling, or relocation of protected wildlife.

A letter from DOC is presented in Appendix 19: Letter from DOC (25/06/26). Pages: 6.

4.3 Reserves Act (1977)

As part of the Substantive Application, the Applicant will seek a concession pursuant to the Reserves Act 1977, to undertake earthworks, install drainage, and walking-track enhancements on land that is owned by the Council and that is subject to the Reserves Act 1977.

The works proposed on land that is subject to the Reserves Act 1977 is as follows:

1. Earthworks to install a stormwater pipe and a walking track on Lot 2 DP 52931 (Local Purpose Reserve (Esplanade and River Protection) Vested on DP 52931), owned by Council.
2. Earthworks to create and operate a road on Lot 6 DP 46315 (Revocation Order- Local Purpose (Road) Reserve), owned by Council.
3. Earthworks to create and operate a stormwater treatment pond on Lot 301 DP 588162 (Local Purpose Reserve Vested on DP 588162), owned by Council.
4. Earthworks to install a wastewater pipe on Lot 1 DP 54694 (Recreation Reserve Vested on DP 54694), owned by Council.

A letter from DOC is presented in Appendix 19: Letter from DOC (25/06/26). Pages: 6.

4.4 Freshwater Fisheries Regulations (1983)

The proposal includes replacing existing culverts with bottomless arch culverts to enhance fish passage and restore instream values for future migratory and resident fish populations. Current ecological investigation has indicated that while there is fish habitat on site; no fish have been found to be on site due to the restriction of fish passage downstream. CFFA approval may be required for the replacement of existing culverts. If required, CFFA approval will be sought as part of the Substantive Application. The substantive application will address the information requirements for CFFA, as specified in clause 3 of FTAA Schedule 9.

4.5 Summary of FTAA approvals sought

In summary, the following approvals will be required for the Project and will be sought under the FTAA if the Project is referred by the Minister:

- Resource Consents required for the Project under the RMA.
- A Wildlife Approval under the Wildlife Act 1953.
- A CFFA Approval under the Freshwater Fisheries Regulations 1983.
- A Concession under the Reserves Act 1977.

A list of all consents sought is available in Appendix 13.

4.6 Other FTAA approvals not being sought

4.6.1 Crown Minerals Act (1991)

Lot 2001 DP 588162, Lots 3-4 DP 306622, and Lot 1000 DP 598401 are subject to the reservations as to 'coal, gold and silver as set on in No. 516880'.

No application for a permit is being made under the Crown Minerals Act 1991.

4.6.2 Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012

No application is being made under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012.

4.6.3 Conservation Act (1987)

No application for a concession is being made under the Conservation Act 1987. No application for a land exchange is being made.

4.6.4 Heritage New Zealand Pouhere Taonga Act 2014

The Applicant has investigated whether the Project would require approval under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA). No further approvals under the HNZPTA are required for the following reasons:

- ArchSite and Council records do not identify any listed or recorded archaeological sites within the development area.
- Consultation with local mana whenua groups (Taranaki Whānui ki Te Upoko o Te Ika, Te Āti Awa, Muaūpoko, and Ngāti Toa) has confirmed that the development area is not within an area of identified cultural significance.
- Historical analysis of the site via Retrolens shows the site has been used solely as grazing land since at least 1943.

A desktop review has not identified any specific sites of social, historical, or cultural significance within the Cannon Point Development site.

Based on that information, an application to Heritage New Zealand Pouhere Taonga for the modification of an archaeological site, or any heritage item listed on the Rārangī Kōrero will not be required. This interpretation may change if new information comes to light.

4.7 Other approvals required (outside of FTAA)

The following steps fall outside the approvals available under the FTAA 2024 and will be required to give effect to the consents, if granted:

1. Council will need to 'stop' an unformed legal road (paper road) on West Block.
2. NZTA Waka Kotahi will need to amend the sequencing and wait times of the traffic control signals on State Highway 2 at the Totara Park bridge, at approximately -41.1152, 175.0813 as set out in Appendix 12: TTAP (23/06.2026). Transport Impact Assessment. Reference NZ20250430-01-102. Pages: 82.

5.0 Significant Regional Benefits

In accordance with section 22(1)(a) of the FTAA, the Project is a development project that will have significant regional benefits.

Section 22(2) of the FTAA identifies a range of matters that the Minister may consider in determining whether a project has significant regional benefits. Those matters which are relevant to the Project are addressed in this section.

5.1 Increasing housing supply, addressing housing needs and contributing to a well-functioning urban environment (s 22(2)(a)(iii) FTAA)

The Project will increase housing supply and contribute to a broader, well-functioning urban environment (including Tōtara Park and Upper Hutt City), directly addressing current housing needs. The Project includes 162 residential dwellings and two commercial allotments within a well-planned and well-connected greenfield development area. A single development of 162 dwellings is therefore equivalent to almost a full year of consented new dwellings across the district (Property Economics, (2026) at Page 20), and would rank among the most significant residential developments in Wellington Region.

The Wairarapa-Wellington Horowhenua Region - Housing and Business Development Capacity Assessment (HBA) (2023) has identified that future growth will require 7,954 dwellings and 55 hectares of commercial land over the next 30 years. The HBA has identified capacity for 18,461 homes to meet demand across the short-, medium-, and long-term periods. The Project constitutes a portion of the identified realisable housing capacity, as it is situated within an progressive and logical greenfield development area.

The Wairarapa-Wellington-Horowhenua Future Development Strategy 2024-54 (FDS) identifies the development of greenfield areas as the lowest priority, given the significant capacity for growth within existing urban areas. The FDS states that greenfield developments should contribute to a well-functioning urban environment by being in areas with easy access to, or the ability to be easily served by, more frequent public transport, and by walking and cycling infrastructure that connects people to employment, services, amenities and education. Further, the FDS expects future greenfield developments to be located in areas that avoid significant natural hazard risks, including those that will be exacerbated by climate change, to ensure the safety of the growing population.

The Wellington Regional Policy Statement (RPS) sets housing bottom lines for each Tier 1 territorial authority in the region, consistent with the requirements of Policy 7 of the NPS-UD. These are as follows:

Tier 1 local authority	Total additional dwellings	
	Short-medium term (2021-2031)	Long term (2031-2051)
Hutt City Council	9,708	15,064
Kapiti Coast District Council	6,123	10,053
Porirua City Council	5,916	8,062
Upper Hutt City Council	4,713	7,510
Wellington City Council	15,089	21,532
Wellington Tier 1 Environment Total	41,549	62,221

Upper Hutt City is required to plan for and enable the development of housing capacity sufficient to meet projected demand over the short, medium, and long term. The Project directly contributes to the City's ability to meet the RPS housing bottom line by delivering 162 serviced allotments in the short to medium term, in a location identified by Council, through Plan Change 50, as suitable for general residential use.

The Project will contribute to a well-functioning urban environment as it can be serviced by various modes of transport including private vehicle, walking and cycling, and access to the Totara Park bus service provided by Metlink. The Project will incorporate walking and cycling infrastructure, providing low-carbon connections to the Tōtara Park urban area, which provides services, amenities, and education facilities. Furthermore, it is proposed to establish a trail connection through the development to the Hutt River Trail, with potential for seating and signage along the route to improve usability and experience. Furthermore, the Project will include the construction of a small commercial precinct within easy walking or cycling distance to the new dwellings.

Architecture Plans (Appendix 8) shows that the Project will offer a diverse mix of dwellings, thereby catering to a wide range of potential residents. In the EIA, Property Economics states that the diversity in dwelling types will support long-term affordability by increasing supply variability and improving the market's ability to respond to demographic change. This diversity of dwelling typologies will provide a regional benefit by addressing a range of housing needs, thereby increasing market flexibility to serve a wider demographic.

5.2 Significant Economic Benefits (s 22(2)(a)(iv) FTAA)

Property Economics (Appendix 4) has prepared the EIA quantifying the regional economic benefits associated with the Project. The assessment estimates the following impacts on the Wellington regional economy over the 5-year development period.

Table 4: Economic Impact Assessment (May 2026). Figures are for the Wellington regional economy over the 5-year development period.

Economic measure	Estimate
Total direct expenditure (excluding land)	\$112.2m
Total value added (GDP), NPV at 8%	\$83.5m
Total value added (GDP), NPV at 2% (sensitivity test)	\$124.5m

Employment in the peak development year	96 FTE years
Total employment over the development period	673 FTE years
Direct employment over the development period	318 FTE years
Indirect and induced employment over the development period	355 FTE years

These benefits would arise at a time of softened construction activity and rising labour underutilisation in the region. The Wellington regional unemployment rate rose to 6.3% in Q1 2026, equivalent to ~21,600 people, and the labour underutilisation rate was around 13.8%, equivalent to ~47,000 people. The Project would support regional employment and improve labour utilisation across the construction sector and supporting industries.

Property Economics (2026) concludes that the Project would deliver significant economic benefits to the Wellington Region.

5.3 Planning documents (s 22(2)(a)(x) FTAA)

The Project Site is zoned RLZ, Open Space, and GRUZ under the District Plan. The density of the Project is not anticipated by those zones, and to that extent it is not consistent with the operative District Plan. This is not a barrier to referral. The fast-track approvals process is designed to enable projects with significant regional or national benefits that may not align with existing planning settings, and s 22(2)(a)(x) is one discretionary matter that the Minister may weigh rather than a mandatory test.

The project aligns with higher-order planning direction. It gives effect to the NPS on Urban Development 2020 by increasing housing supply and contributing to a well-functioning urban environment, and it responds to the regional direction for additional housing supply and capacity across the Wellington Region.

The Project offers an opportunity to establish conservation measures by enhancing and restoring wetlands and riparian vegetation within and immediately adjacent to the development areas. The successful implementation of these measures has the potential to contribute towards a high-amenity, residential area and provide cross-boundary ecological benefits to the nearby Akatarawa Forest. These benefits would take the form of increased variety and quality of habitat and food sources for native bird and insect populations. The proposed supplementary planting would also increase the variety of seed stock, thereby promoting natural regeneration in the wider Tōtara Park area and Te Awa Kairangi Hutt River environment.

While the clearance of some native vegetation is required as part of this development, subject to the substantive application, it was found (Blue Green Ecology (2024), Boffa Miskell (2026)) that this vegetation was of low value overall, being characterised by common mahoe broadleaf forest typical of the regenerating hillslope areas within the Wellington Region (refer to the Blue Green Ecology Report and the Boffa Miskell Ecology Report). The Project can increase the ecological value of the land to be developed by removing grazing pressure and utilising supplementary planting to enhance the diversity of native vegetation around riparian margins and wetland areas.

For the reasons addressed later in this report, it is considered that the Project is consistent with the NPS-IB and NPS-FM.

5.4 Summary (Benefits)

The Project delivers significant regional benefits across the three matters identified in section 22(2) that are most directly affected by a residential development project of this scale.

In relation to section 22(2)(a)(iii), the Project contributes 162 new dwellings and two commercial lots to Upper Hutt City, which is significant in the regional context. The Project is consistent with the FDS expectations for greenfield development at the urban edge of a Tier 1 local authority, including its location relative to public transport, active mode connections, and natural hazard areas.

Property Economics (2026) concludes that the Project will produce the following benefits:

- Total NPV at 8% over the 16-year development period is \$83.5m.
- Total NPV at 2% over the 16-year development period is \$124.5m.
- FTE years during the peak development year are estimated at 96 FTE years.
- Total FTE years over the 16-year development period are estimated at 673 FTE years.
- Total direct employment over the development period is estimated at 318 FTE years.

In relation to s 22(2)(b), the Project delivers a net improvement in indigenous biodiversity through the protection and enhancement of two natural inland wetlands, the establishment of riparian buffers, the restoration of fish passage, and the offset of low-value vegetation clearance through higher-value enhancement.

Cumulatively, the benefits of the Project described in this section are significant for, and in the context of, the Wellington region. Referral of the Project is therefore consistent with the purpose of the FTAA.

6.0 Appropriateness for FT approvals process

For the reasons set out in this section, referring the Project to the FT approvals process would facilitate the Project, including by enabling it to be processed in a more timely and cost-effective way, and doing so is unlikely to materially affect the efficient operation of the FT approvals process.

This chapter sets out an assessment of the s22(1)(b) process-based criteria.

6.1 Timely and cost-effective way

Both limbs of s22(1)(b) are addressed below.

Background of historical consenting

Before submitting this referral application, the Applicant attempted to progress the development of the East and West Blocks through a range of planning pathways under the RMA 1991. The history of these attempts is summarised below and demonstrates that conventional consenting routes have been substantially exhausted.

The Applicant has been a submitter on the Regional Council's PC1 and was actively involved in the City Council's PC50 before its withdrawal in December 2025. The Applicant continues to contribute to the PC1 hearings process, where relevant to the project.

For the West Block (Stage 3), initial discussions with the Regional Council were conducted via email in September 2024, prior to a formal pre-application meeting. During those discussions, the Regional Council advised the Applicant that it did not consider there to be a viable consenting pathway for the West Block under Regulation 45C of the NES-F (urban development in or near a natural inland wetland). At the same time, the land remained zoned Rural under the Operative District Plan (despite the proposed upzoning in the PC50). Consent under the NES-F was essential to enable the development to progress, and the Regional Councils position effectively halted the Applicant's further work to obtain consents for the West Block under the RMA pathway.

For the East Block, resource consent applications were lodged with both Council and Regional Council on 20 December 2024 for residential land development and subdivision. The Regional Council granted regional consent WGN250152 for earthworks and stormwater discharge on 24 June 2025. The application to Council (RM2410147) was made in anticipation of PC50, which included amendments that would have upzoned the site from General Rural to General Residential. A subsequent earthworks application (RM2510117) was lodged with Council on 12 September 2025 to authorise enabling earthworks and to allow the Applicant to give effect to the regional consent in the 2026 summer earthworks season. Neither consent has been granted.

The Applicant and the Council were working through a third round of further information requests under section 92(1) of the RMA 1991 when, on 10 December 2025, the Council resolved to withdraw PC50. The withdrawal was made in response to section 80Q of the RMA 1991 (aka the 'Plan Stop' inserted by the *Resource Management (Consenting and Other System Changes) Amendment Act 2025*) and the significant financial implications and legal risk of continuing the plan change in the context of the broader reform of the RMA 1991. The Applicant opposed the withdrawal and presented to Council in support of retaining the plan change in part. The withdrawal materially constrained the consenting pathways available to the Applicant under the RMA 1991.

Timeliness and cost-effectiveness of the FTAA pathway

The Applicant has been actively pursuing the development of these areas since early 2020. Continuing to pursue consents under the RMA 1991 would, on a realistic assessment, take a further two years or more to obtain a final decision, accounting for public notification, Council-level hearings, and likely Environment Court appeal processes, with no certainty of approval at the end of that process.

The FTAA pathway provides a coherent, single-track route to a substantive decision for the Project. Lodging this referral application allows the Applicant to:

- Consolidate consenting for the East and West Blocks within a single application, avoiding the duplication of cost and effort that has been incurred to date in pursuing separate pathways;
- Surrender the existing regional consent (WGN250152) on grant of substantive approval, providing a clean and unified consenting record, or apply for a change to WGN250152 under section 127 of the RMA 1991;
- Rely on the substantial body of technical work already commissioned (civil engineering, geotechnical, ecological, transport, landscape, urban design, and economic assessments), each of which has been prepared to the standard required by the FTAA; and
- Move to a decision within the statutory timeframes set out in the FTAA, which are materially shorter than the realistic timeframes for the alternative pathways described above.

The cost recovery regime under the Fast-track Approvals (Cost Recovery) Regulations 2025 is acknowledged. Even accounting for the application fee, levy, and ongoing cost recovery payable to the Environmental Protection Authority, the FTAA pathway is materially more cost-effective than continuing to pursue separate RMA consents and a private plan change. Given the cost and time already invested by the Applicant in pursuing approvals for the Project, the application under the FTAA 2024 is considered the most appropriate, timely, and cost-effective option available.

The fees for a referral application include:

- \$12,000 application fee (excluding GST).
- \$6,700 levy (excluding GST).

Effect on the efficient operation of the fast-track approvals process

The second limb of section 22(1)(b) requires that the referral is unlikely to materially affect the efficient operation of the fast-track approvals process. The Project is a discrete, well-defined residential and infrastructure project of moderate scale relative to other projects already referred to under the FTAA or listed in Schedule 2 of the Act. The technical assessments accompanying this application are at an advanced stage of preparation, the project team is experienced with fast-track consenting, the consenting issues have been clearly identified through the prior RMA work, and the effects associated with the Project are typical for a proposal of this scale. On that basis, the referral is unlikely to place a disproportionate demand on the EPA or an appointed panel, or to materially affect the efficient operation of the fast-track approvals process.

Conclusion on section 22(1)(b)

For the reasons set out above, referral of the Project to the approvals process would facilitate the Project by enabling it to be processed in a more timely and cost-effective way than under the normal RMA processes, and is unlikely to materially affect the efficient operation of the fast-track approvals process. Section 22(1)(b) is satisfied.

6.2 Ineligible activity

Section 5 of the FTAA 2024 sets out the activities that are ineligible for referral under the FTAA approvals process. The Project does not include any ineligible activity. An assessment against each limb of section 5 is set out below.

(a) Māori land. The Project Site is freehold title owned by the Applicant (or, in the case of the parcels owned by Council, subject to civil works and vested in the territorial authority). No part of the Project Site is Māori land within the meaning of section 4 of Te Ture Whenua Māori Act 1993. The activity is not an ineligible activity on this ground.

(b) Customary marine title area. The Project will not occur in a customary marine title area as defined in the Marine and Coastal Area (Takutai Moana) Act 2011. The Project Site is not within the coastal marine area, and no customary marine title affects the Project Site .

(c) Protected customary rights area. The Project will not occur in a protected customary rights area as defined in the Marine and Coastal Area (Takutai Moana) Act 2011. No protected customary rights have been recognised over the Project Site .

(d) Māori customary land or Māori reservation. The Project Site is not Māori customary land, nor is any part of it land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993.

(e) Aquaculture. The Project does not include any aquaculture activity nor an activity that is incompatible with aquaculture activities. The Applicant does not seek any coastal permit.

(f) Crown Minerals Act 1991. The Project does not require an access arrangement under the Crown Minerals Act 1991. While the Crown's reservations of coal, gold, and silver are recorded against certain parcels (as set out in Section 4 of this report), no mining or prospecting is proposed, and no access arrangement is required.

(g) Sections 165J, 165M, 165Q, 165ZC and 165ZDB of the RMA 1991. The Project will not be prevented by any of sections 165J, 165M, 165Q, 165ZC or 165ZDB of the RMA 1991. These provisions concern aquaculture moratoria and certain coastal occupation matters that are not engaged by a residential development.

(h) Schedule 4 land. The Project Site is not land listed in Schedule 4 of the FTAA 2024, which relates to land of high conservation value protected from non-mining activities.

(i) National Reserve. The Project Site is not a national reserve held under the Reserves Act 1977.

(j) and (k) Reserves Act 1977 land. Part of the Project Site is held under the Reserves Act 1977, being Lot 2 DP 52931 (local purpose / drainage reserve) and Lot 301 DP 588162 (a drainage reserve). Both parcels are vested in Council, the relevant local authority, and are not held by a private trust or community organisation. Approval, subject to the Reserves Act 1977, are as a result of works (trenching, drainage) being required on crown-owned reserve land. Consultation with Council and the Department of Conservation has commenced and is on-going. Post-lodgement, the Department of Conservation will provide a report about the land which is subject to the Reserves Act 1977 and the effect, if any, on conservation values. The activity is not an ineligible activity on this ground.

(L) Sections 15B and 15C of the RMA 1991. The Project does not include any activities that are a prohibited activity under the EEZ and Continental Shelf (Environmental Effects) Act 2012; or an activity

that is described in s 15B of the RMA 1991 and is a prohibited activity under that Act; or an activity that is prohibited by s 15C of the RMA 1991:

(m) Decommissioning-related activity. The Project does not include any decommissioning-related activity within the meaning of the Crown Minerals Act 1991. No petroleum or mineral infrastructure is being decommissioned.

(n) Offshore renewable energy. The Project does not include any offshore renewable energy activities.

For completeness, no part of the Project triggers any of the further ineligibility provisions identified in section 5 of the FTAA. The Project therefore does not include any ineligible activities, and the subject site is not land listed in Schedule 4 of the Act.

6.3 Summary of compliance or enforcement actions

This section sets out a summary of compliance or enforcement actions (if any) taken against the applicant under a specified Act, and their outcomes.

Requests were made to Council and Regional Council on 06/05/2026 to determine whether any 'compliance or enforcement actions' have been undertaken against the Applicant.

The Regional Council has confirmed that there are no records of enforcement action being taken against the Applicant.

Council has confirmed that two abatement notices have been issued under the RMA 1991, a summary of which is provided as follows:

- Council issued an abatement notice on 11/12/2024 for unconsented earthworks and the requirement for a geotechnical report to address the works, at stage 2B of the Cannon Point Development. This notice was cancelled on 21/05/2025 as a resource consent and geotechnical report was received for the earthworks. It is noted that the resource consent remains on hold and has not yet been issued. Therefore, the earthworks remain an outstanding issue.
- Council issued an abatement notice on 9/02/2022 for earthworks commencing prior to the require management plans being submitted as part of a resource consent and for works being undertaken outside of consented hours.

This sets out a summary of compliance or enforcement actions (s 13(4)(x)).

6.4 Prohibited activities under the RMA 1991

This section sets out any activities involved in the project that are prohibited under the RMA 1991.

Consent will be sought under Regional Rule WH-R13, which has been notified and has immediate legal effect. Per section 87B of the RMA 1991, the activity status is discretionary because the PC1 Hearings have not been completed; therefore, that rule is not operative.

6.5 Summary

Referral of the project would provide a timely and cost-effective means of obtaining resource consent and other approvals. Referral of the project would not hamper the efficiency of the FT Approvals process.

The proposal is not ineligible under s 5 of the Act.

The proposal does not include a prohibited activity.

7.0 Assessment of anticipated and known environmental effects

In accordance with s13(4)(h) of the FTAA 2024, the following anticipated and known adverse effects of the Project on the environment are addressed below. In preparing the following AEE, the authors of this report have relied on the technical advice of other experts when the subject matter falls outside our area of expertise. This section describes the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects.

7.1 Ecological Effects

Two ecological assessments were undertaken for the Project: Blue Green Ecology assessed East Block, and Boffa Miskell assessed West Block (respectively, the **Blue Green Ecology Report** and the **Boffa Miskell Ecology Report**). Both are contained in the appendices and relied upon below. Each assessment involved site walkovers and desktop analyses to identify terrestrial flora and fauna, freshwater values, and wetland values within the Project Site.

The Project will require vegetation clearance on both blocks to enable recontouring of the river terraces. All streams and natural wetlands will, where possible, be excluded from the earthworks area, and the restoration and enhancement of riparian and wetland areas will be undertaken as part of the Project.

A summary of the ecological features on each Block and the way in which they will be affected by the Project, as assessed by Blue Green Ecology and Boffa Miskell is described below.

7.1.1 East Block

The effects relating to the terrestrial and aquatic ecology of East Block have been addressed in Appendix 11: Blue Green Ecology Ltd (19/12/24). Cannons Point Eastern Stage 4 Ecology. Pages: 43.

Blue Green Ecology (2024) found that the terrestrial vegetation within the East Block was characterised by a common mahoe broadleaf forest typical of the regenerating hillslope areas within the Wellington Region. The small wetland identified by Blue Green Ecology was found to be of low value, as it is a small, exotic-dominated seepage and does not represent a natural, indigenous wetland type, nor does it have any hydrological or downstream buffering function. Rocky escarpment slopes beneath the mahoe canopy were identified as potential habitat for copper and northern grass skinks; however, given their proximity to residential areas and the absence of predator management, lizard abundance is likely low.

The development of the East Block for the Project will require clearance of up to 2,000 m² of vegetation, consisting primarily of small stands and individual trees within grazed areas that show no signs of natural regeneration.

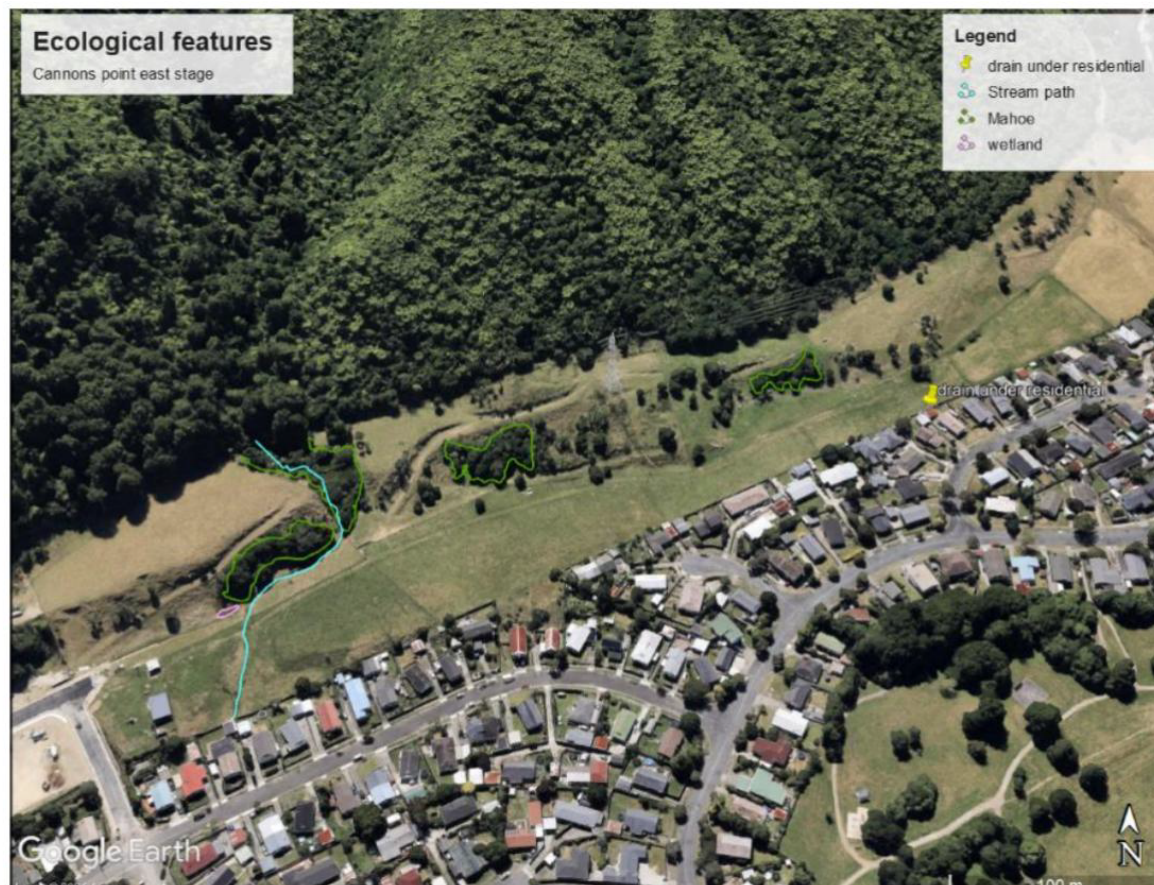


Figure 3: Excerpt taken from Blue Green Ecology Ltd (Appendix 11, at Page 19).

7.1.2 West Block

The effects relating to the terrestrial and aquatic ecology of West Block have been addressed in Appendix 5: Boffa Miskell Ltd (13/5/26). Summary of Cannon Point Stage 3 ecological knowledge for Fast Track Referral Application. Pages: 80.

Boffa Miskell (2026) found that terrestrial vegetation within the West Block is similarly characterised by early-seral mahoe/tree fern forest, and mixed native/exotic scrub (Appendix 5). Boffa Miskell identifies a small wetland as being in the middle of the upper terrace within the eastern third of the West Block. Boffa Miskell predicts that this is likely an induced wetland resulting from the construction of historic farm tracks, altering drainage patterns leading from the terrace to the valley floor. Preliminary analysis by Boffa Miskell compares this wetland area to similar features previously identified in Stages 1 and 2 of the Cannon Point Development. These features were found to be low-value systems with simple vegetation structure and limited ecological function, and Boffa Miskell consider it highly likely that further investigation into the wetland on the West Block will produce similar findings.

Both Blue Green Ecology (2024) and Boffa Miskell (2026) predict that the potential ecological effects associated with the Project will fall within the 'Very Low' to 'Low' range owing in large part of the low ecological value of the features on both Blocks and to the ways in which the Project will seek to avoid, remedy or mitigate its effects on those features. Anticipated ecological effects resulting from the proposed vegetation clearance, minor earthworks near stream and wetland margins, and potential

disturbance of low-value wetland or lizard habitat can all be effectively managed through standard construction practices and through the application of the effects management hierarchy.

Overall, it is considered that any potential ecological effects associated with the Project can be appropriately managed through a combination of mitigation measures and restoration initiatives. These measures are expected to improve habitat quality, reduce predation pressure, and enhance ecological values across the Project Site. The effects on ecological values are considered acceptable and will result in an overall improvement relative to the site's existing ecological condition.



Figure 4: West Block wetland from d/s extent looking u/s (west).

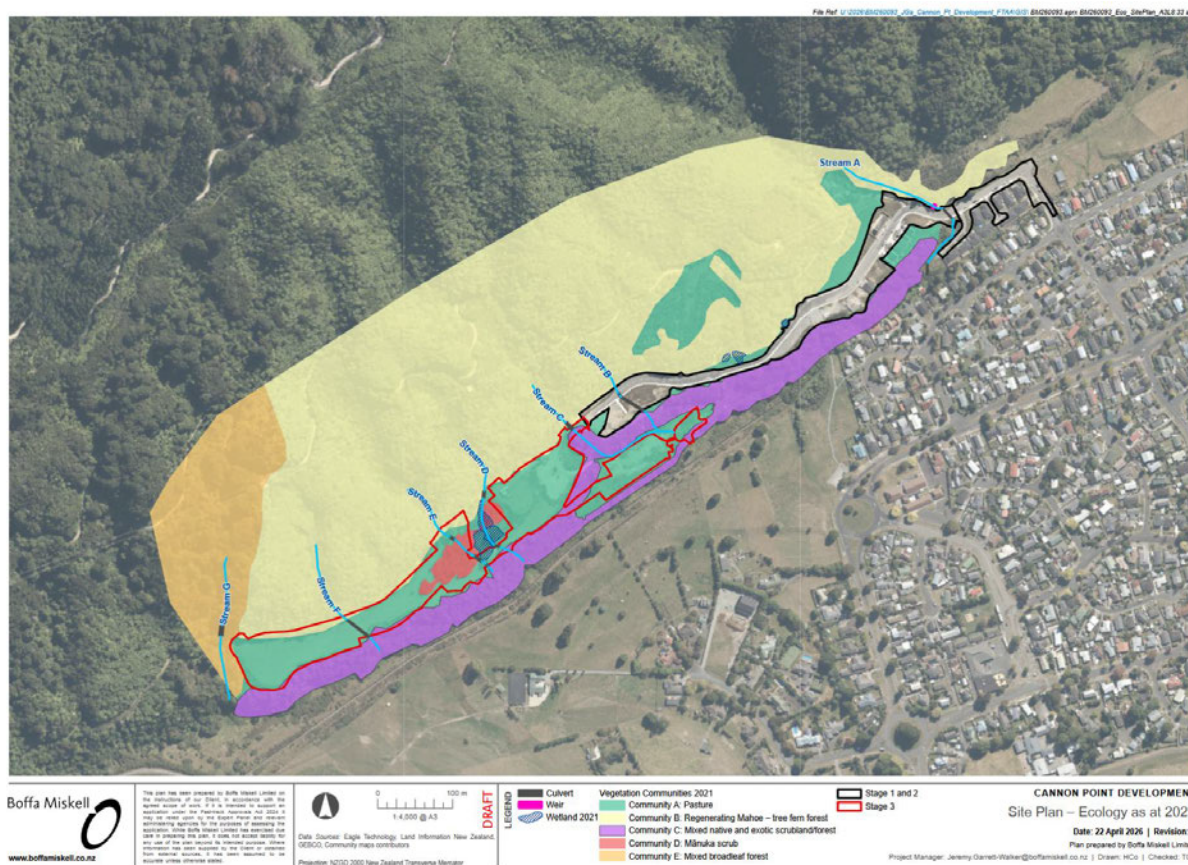


Figure 5: Excerpt taken from Boffa Miskell Ltd (Appendix 5 at Page 16).

7.2 Landscape and Visual Effects

The visual effects relating to landscape have been assessed in Appendix 9: BLAC Ltd (25/06/26) Landscape and Visual Effects Memorandum for Fast Track Referral: Cannon Point Road, Totara Park, Upper Hutt (Stage 3) and 4 Colorado Road, Upper Hutt, New Zealand (Stage 4). Pages: 26.

A Landscape Memorandum (**LM**) in support of this referral application has been prepared by BLAC Limited and is attached as Appendix 9.

The LM states that, despite the existing landscape of both Blocks being modified and exhibiting reduced naturalness, the rural character remains.

The Project, to a certain degree, avoids adverse landscape effects and retains the visual amenity of the broader landscape; however, urban development in general is not aligned with the statutory provisions for this area.

The Akatarawa Forest Park provides a large extent of mitigation for the Project because it will continue to dominate all viewpoints of the Project Site once the Project is implemented. The residential setting of the surrounding suburbs and the general pattern of development up to the foothills in the Hutt Valley also provide some mitigation, allowing the Project to more easily assimilate into its residential surroundings. The issues with the proposal arise from the characterisation of the site as rural and/or an open-space/lifestyle block, and the current associated amenity values.

BLAC Limited has prepared the Landscape Strategy in support of the referral application, which sets out planting and density measures to avoid, remedy, or mitigate the effects on visual amenity and to retain elements of the natural character of the assessed views. The landscape is broad, and its appreciation is wide-ranging, so, despite the change in character, the Project can (to an extent) be absorbed into the landscape, like developments such as Riverstone Terraces. Despite the Project not aligning with the planned character of the District Plan, it presents an opportunity to create a new residential landscape with controls that recognise the key aspects and values of the broader landscape.

The proposed visual mitigation will effectively manage the effects of the Project and ensure they are not adverse to most residents in proximity to the Project. However, where the Project is experienced from areas such as from the stopbank next to the Hutt River trail, effects fall to low-moderate. The recommendation set out is intended to reduce these effects. On balance, the effects on the other close-proximity views are considered Low-Moderate once the mitigation becomes effective. The effects on other people who will experience/view the Project are considered Low.

7.3 Transport Effects

TTAP (2026) has assessed the transport effects of the Project in the Transport Assessment (Appendix 12). The TIA assesses the proposal's impacts on the surrounding transport network using staged development scenarios. It evaluates the potential effects by addressing the transport effects of both the temporary construction phase and the long-term operational impacts of the completed development on the surrounding transport network.

TTAP (2026) found the transport effects attributable to the Project to be minor to moderate. The modelling clearly demonstrates that performance constraints observed at the Tōtara Park Road / SH2 intersection are a pre-existing network condition and will continue to worsen with or without the additional transport movements generated by the Project.

Subject to implementation of the recommendations below, TTAP concludes that the Project will not cause the deterioration of performance capacity at the Tōtara Park Road / SH2 intersection.

TTAP (2026) recommends the following measures to ensure the Project does not result in additional traffic network degradation:

- The implementation of signal optimisation measures at the Tōtara Park Road / SH2 intersection. No further physical road upgrades are required to accommodate the Project.
- Signal optimisation will be implemented before or concurrent with the occupation of dwellings constructed on the East and West Blocks. Coordination with NZTA will be required to confirm and implement the final signal timing changes within the SCATS system.
- Ongoing monitoring of intersection performance will be undertaken at intervals of 6 and 12 months following the completion of each stage, including queue length surveys, travel time observations, and SCATS data review, to verify that actual traffic conditions are consistent with modelled predictions.

These measures are expected to mitigate the Project effects and integrate it with the surrounding transport network. Any additional improvements to the Tōtara Park Road / SH2 intersection and upgrades, such as additional turning lanes and intersection widening, shall be investigated and treated as a separate matter, independent of the proposed development. No further physical road upgrades are proposed as part of this Fast Track Application.

7.4 Natural Hazards Effects

7.4.1 Flooding Effects

Vecta Ltd (Appendix 7) has assessed the flood hazard risks presented by overland flow paths which currently run through the East Block and West Block in its Civil Infrastructure Report.

In its Civil Infrastructure Report, Vecta found that the development of the East Block will not significantly increase the existing flooding hazard to Totara Park properties, nor will it result in any flooding risk to the proposed building platforms and associated dwellings. The development of the East Block was also found to result in a reduction in overland flow into the neighbouring properties at 11-19 Indiana Grove, which is eliminated by the new road kerb and channel redirecting the flow. A marginal increase in flooding depth of less than 1 mm into the neighbouring properties at 39 to 63 Hartford Cres is modelled. Vecta Ltd (2026) concludes that this is insignificant and will not increase the flooding risk to these properties.

Vecta (2026) found that for the West Block, surface water from the vegetated catchment upslope of the development area will be controlled via cutoff drains, directing flow to bridges and/or bottomless culverts through the development, discharging to Haukāretu Stream (UHCC_SWCH000133). All culvert outlets will have appropriate erosion protection installed. Vecta Ltd states that the proposed cutoff drains will eliminate the existing flooding risk currently experienced by Totara Park properties, directing overland flows towards Haukāretu Stream and protecting the development from flooding.

Any flooding effects associated with the Project will be less than minor. Modelling prepared by Vecta Ltd (referenced in the Civil Infrastructure Report) indicates that potential flood effects can be mitigated through the construction of stormwater infrastructure, such as upslope cutoff drains and appropriately sized kerb-and-channel drains.

7.4.2 Geotechnical

The geotechnical effects of the development are assessed in Appendix 6: Engeo Ltd (08/05/26). Cannon Point Stage 3 Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 176. and Cannon Point Stage 4 - Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 227. The effects that were considered by Engeo are: primary and secondary hazard due to proximity to a fault, liquefaction, slope stability, rockfall, and debris flow. The methods and results of Appendix 6 are adopted here, in particular Table 16 which presents a summary of risk and mitigation.

West Block

The investigation combined a desktop review, a walkover (4 March 2026), test pits with Scala penetrometer and shear vane testing, and earlier borehole and SPT data, integrated into a model. Hazards were evaluated through seismic, liquefaction, slope stability, seismic displacement, runout and debris flow analyses.

ENGEO identifies slope stability as the primary constraint. The site lies approximately 250 m from the Wellington Fault; seismic-related ground rupture is assessed as low but cannot be excluded at the southern margin, and ground shaking is expected. Specific Engineered Design (SED) zones are accordingly required along the terrace crest, extending 10-32 m from the crest (Zones A, B, and C). Building foundations within these zones must have SED to withstand of seismic-induced displacement.

Debris flow risk is associated principally with sediment-laden stormwater rather than large-scale soil mobilisation. Modelling indicates most lots fall within the lowest damage class, with Lot 37 the most exposed. Lots along the north-western toe require runout mitigation. Liquefaction and lateral spreading are assessed as negligible, and rockfall as low.

ENGEO concludes that, although the site presents natural hazard risk, residual risk to the proposed dwellings can be reduced to an acceptable level that is consistent with the NPSIB once the recommended mitigations are designed and constructed. Slope stability, foundations, retaining structures (1.0 to 6.5 m), cut and fill batters, and erosion and sediment controls are to be confirmed at the time of consent. ENGEO recommend conditions, including but not limited to lot-specific investigation within the SED zones. Those conditions form part of the Project.

East Block

Likewise, Engeo assessed the effects of the Proposal on East Block, using the similar methods to West Block (set out above) being a review of test pits from previous investigations, site walkover observations, and modelling. As with West Block, the methods and results of Appendix 16 are adopted here, and relied on to provide the following assessment of anticipated and known effects. Relying on Table 16 of the Engeo report for East Block, the risk assessment for active faults, liquefaction, rockfall, and debris flow are low. The report provides an analysis of the risk to allotments on the Project Site below the slope, as a result of slope stability effects, through either rain-induced failure, shaking, or a combination. For those allotments above the fill batter, the risk of failure undermining foundations, ie along the southern boundary, is considered to be low and able to be mitigated by way of SED and location. The risk to those sites below the slope, is considered to be medium, which is a higher risk than those other effects mentioned above. Under the NPS, where a natural hazard risk has medium classification, it must be avoided or mitigated. Engeo goes on to recommend SED foundations for those dwellings, as well as further testing. Both of these will occur as part of any future Substantive Application.

Relying on Table 16 of Engeo (2026), the site is able to developed and subdivided, subject to SED of building platform location and design.

7.5 Infrastructure Effects

The effects relating to network utilities are assessed in Appendix 7: Vecta Ltd (12/06/26). Civil Engineering Plans Design for Approval (26014). Sheets: 19, reference 26014, and Civil Infrastructure Report (17/06/26). Pages: 77.

The following is an AEE of the proposed servicing and utilities. All commercial, residential, and balance allotments will be serviced. The reserve allotments will not be serviced by potable water, wastewater drainage, electrical, or telco but will be serviced with stormwater drainage, legal and physical access.

7.5.1 Wastewater drainage

As set out in the Civil Infrastructure Report, the Project will be connected to the existing public wastewater network rather than relying on any new or standalone treatment. All wastewater from the new dwellings in both Blocks will flow by gravity through mains to be constructed as part of the Project into the Council's reticulated network in Totara Park. From there, wastewater will flow to the Totara Park wastewater pump station, which lifts the flow onward through the wider system.

Stages 1 and 2 of the Cannon Point development are already connected to this network through Tacoma Drive. Because of the shape of the land in both Blocks, wastewater from the two new stages (East Block and West Block) cannot drain the same way. West Block will therefore connect into the network at Tulsa Park, and East Block will connect at Larchmont Grove. These are new connection points into infrastructure that already exists, so no new pipelines are needed across undeveloped land or waterways beyond the Project itself.

The new houses will add to the amount of wastewater the network carries. The engineers have estimated this increase using the methods set out in the Wellington Water Regional Standard for Water Services (RSWS) and Regional Specifications (RSpec), assuming an average of 3.5 people per dwelling. At present, the Totara Park area produces a peak wet-weather flow of about 32.8 litres per second. With the development added, this is expected to rise to about 38.0 litres per second, an increase of roughly 5.2 litres per second.

The main question for wastewater is whether the existing pump station can handle this extra flow. To assess the capacity within the pump station to accommodate the additional flow resulting from the Project, the engineers compared the expected flows against the pump station's capacity, drawing on both the original construction records and around two months of recorded operating data from the station itself. On that basis, they concluded that the pump station has sufficient capacity and will not need to be upgraded to accommodate wastewater flows from the Project.

The effect of the wastewater resulting from the Project and the way in which it will be treated and discharged on the wider environment is therefore minor. The wastewater is contained within an existing, managed public network and is treated at the regional treatment plant in the normal way, so there is no direct discharge to land or water from the Project. The increase in flow is small relative to what the network already carries, and the receiving infrastructure has been confirmed as adequate.

7.5.2 Stormwater drainage

The Project sits on a terrace below a large area of bush and forested hill country. Rain that falls on those hills already runs down across both Blocks and into the public drainage system, ending up in Te

Awa Kairangi Hutt River. The stormwater solution for the Project has therefore been designed to work with this existing pattern rather than against it.

Overland flow that comes off the bush hills above the Project will be directed through (or under) the development in a controlled way and does not need quality or quantity mitigation. The second type is the runoff generated within the development itself, from new roads, driveways, and rooftops. This is the water that needs to be managed for both quality and quantity, and the intended approach to manage that water for both Blocks is addressed below

In addition to those solutions, every new house lot will have a stormwater detention tank (ie an Approved Solution under Wellington Waters *Managing Stormwater Runoff*) so as to achieve hydraulic neutrality. This requirement can be achieved by way of consent notice. Runoff from the new roads is directed through raingardens achieving both quality and quantity.

West Block

The West Block drains to an open channel that runs through Totara Park and from there to the Te Awa Kairangi Hutt River.

Clean water coming off the hills above this block is intercepted by cutoff drains and carried through the West Block in culverts to the Council drain, keeping it away from the new houses. Runoff from the new roads is treated in a raingarden on Lot 102, shared with the adjoining earlier stage, before it reaches the Council drain.

In its Flood Assessment, Vecta Ltd (2026) assessed a one-in-one-hundred-year storm, including an allowance for climate change, shows the flood hazard on the house lots is acceptable. The roads are also at this lowest level for the most part, with a slightly higher level at one cul-de-sac that poses a minor risk to small vehicles only. The Council drain itself carries a higher hazard rating, but it is a dedicated drainage channel built for that purpose, so this presents no increase or change in risk.

East Block

The eastern part of the East Block development will drain directly to the Hutt River through a raingarden at the eastern end of the East Block Site (Lot 506).

The management of clean water from the hills is particularly relevant here. At present, water from several of the uphill catchments flows uncontrolled across the ground and into existing Totara Park properties, because there is nothing shaping or directing it. This already creates a flooding risk for those properties. The Project will intercept and control this flow, which remedies the existing flooding risk rather than adding to it.

As with the West Block, runoff from the new roads in the East Block will be directed to and treated in a raingarden (lot 506) before discharging to the river. The increase in flow is marginal increase of what the Hutt River already carries during a large flood, and the existing flood risk to neighbouring properties will be reduced as a result of the Project.

Flood modelling of the same 1%AEP storm undertaken as part of the flood assessment for the Civil Infrastructure Report shows the hazard within this East Block is also acceptable. For further details see Vecta (2026).

Overall effect

Across both blocks, the stormwater is contained and managed within an existing, well-understood drainage system that discharges to Te Awa Kairangi Hutt River. House lots hold detain their own runoff, road runoff is treated in rain gardens before discharge, and the additional flow reaching the river is negligible. In the east block, the design also improves an existing flooding problem for neighbouring properties.

The flood risk resulting from the Project has been assessed against the NPS for Natural Hazards and rated as Low to Medium, on the basis of an unlikely-to-possible event combined with minor consequences.

The stormwater design also meets the regional requirements for a Stormwater Impact Assessment, and the treatment devices meet the regional contaminant reduction targets. For further details see Vecta (2026).

Through implementation of these measures, the overall effect of the Project on stormwater and flooding is therefore minor.

7.5.3 Potable water supply, including firefighting

As set out in the Civil Infrastructure Report, the Project will be serviced with potable water by connecting to the existing municipal water network in Totara Park, rather than by drawing on any new source. The Totara Park supply area is fed from the Cruikshank Reservoir, with a second supply available from the Timberlea Reservoir, so the area already has more than one way of being supplied.

New mains will extend the existing network into the Project. The West Block will be connected to piped network established westward from the earlier stages of the Cannon Point development, and East Block connects northwards through to the existing network at Larchmont Grove. This northern connection means the East Block development can be serviced from two directions improving the resilience of the supply if a problem occurs in the network.

The same network also provides water for firefighting. Fire hydrants will be installed throughout the development in accordance with SNZ PAS 4509 and RSWS.

There is sufficient water supply, pressure, and firefighting capacity for the Project by extending the existing network, and no upgrade to the water source is required.

The effect of the Project on the capacity and function of the water supply network is therefore minor. For further details see Vecta (2026).

7.5.4 Power and telecommunications

Power and telecommunications will be extended to every new residential, commercial, and balance lot in the Project (but not reserves). Both services will connect into and extend the existing utility networks that already serve the earlier stages of the Project, so the new stages will continue the established servicing pattern. Wellington Electricity has been consulted on the power reticulation, and Chorus has been consulted on the telecommunications reticulation. On that basis, the development can be serviced by these networks.

All services will be installed underground. The design also coordinates the various underground services and maintains separation distances between them, which reduces the risk of conflicts during installation and during future maintenance.

The existing overhead high-voltage line operated by Wellington Electricity that crosses the Project Site will be placed underground. This removes an existing overhead hazard and improves the visual character of the area.

New natural gas connections may be made.

The effect of the Project on power and telecommunications is therefore minor, and in the case of the overhead line, a positive one.

7.5.5 Internal road

The Project will extend the existing internal road network constructed during earlier stages of the Cannon Point development, and will provide road access to every new lot. The new roads follow the same design approach as the completed stages, and their alignments follow the natural shape of the terrace, which keeps earthworks and retaining walls to a minimum and maintains practical road gradients. Importantly, the road in West Block was designed to avoid the wetland reclamation, but does require retaining and vegetation clearance to achieve this.

In East Block, the main road (Colorado Road) will be extended by approximately 600 metres, together with a side road that drops down to the lower terrace and serves the new lots, the raingarden, and a walking connection in that area.

In West Block, the road extends northwards and connects through to the existing road at Larchmont Grove (Council land), forming a continuous loop rather than a dead-end street. This is a particular benefit of the Project. A looped road provides a second way in and out of this part of the subdivision, which is safer and more reliable for residents and for emergency services, and means the area is not dependent on a single access point if one route is blocked or under maintenance. The loop is also capable of carrying a bus route should public transport be extended into the area in future, although no public transport service is proposed at this stage.

The roads have been designed per NZS4404 as well as Councils Code of Practice (COP) to accommodate the vehicles that use residential streets, including refuse trucks and fire appliances, with turning areas provided where needed. Footpaths, street tree planting, and street lighting will be provided along the road corridors, consistent with the earlier stages, with the lighting designed to the relevant standard at the detailed design stage.

Through these measures, the internal roading network will ensure that vehicles and pedestrians are able to efficiently move through the Project, and can integrate safely with the wider existing network.

7.6 Earthworks Effects

The effects relating to earthworks are assessed in:

- Appendix 7: Vecta Ltd (12/06/26). Civil Engineering Plans Design for Approval (26014). Sheets: 19, reference 26014, and Civil Infrastructure Report (17/06/26). Pages: 77. and
- Appendix 6: Engeo Ltd (08/05/26). Cannon Point Stage 3 Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 176. and Cannon Point Stage 4 - Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 227.

Earthworks will be required to establish key components of the Project including the roads, building platforms and landscaping. Anticipated and known effects arising from earthworks include:

- Land instability and erosion.
- Erosion and Dust.
- Landscape and visual amenity effects.

To mitigate any potential adverse effects of the proposed earthworks, the effects management hierarchy will be implemented. Where possible, earthworks will be avoided within areas of increased instability or near existing wetlands or waterways. Potential effects will be remedied through the progressive staging and stabilisation of disturbed areas. Stabilisation or cut faces will be carried out via a combination of hydroseeding and native planting. Erosion and sediment control measures will be installed and maintained in accordance with the ESCP prepared by Vecta Ltd, as shown on Plans C210-C233 (Appendix 7). This will include, but not be limited to, the installation of sediment retention ponds (SRPs) decanting earth bunds (DEBs), clean water cutoffs, and silt fences. Monitoring and reporting requirements will be specified within the ESCP to ensure the continued maintenance and performance of the erosion and sediment control measures.

Suitable topsoil will be stockpiled and reinstated for landscaping purposes once the bulk cut-and-fill earthworks have been completed. The development of both the East and West Blocks has been designed to minimise earthworks within the riparian margins of the four small streams that flow from the vegetated hills to the north of the Project Site.

Geo - West Block

Based on the methods and results of the geotechnical engineer at s 8.3 of Appendix 6: Engeo Ltd (08/05/26). Cannon Point Stage 3 Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 176. and Cannon Point Stage 4 - Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 227. the site is likely suitable for the proposed subdivision, subject to appropriate engineering design and lot-specific assessment. Ground conditions are variable, and lots along the terrace riser crest will require Specific Engineered Design (SED) to accommodate up to 300 mm of seismic displacement. Earthworks will be undertaken in accordance with NZS 4431, with cut and fill batters, retaining structures, and foundations confirmed at detailed design. Debris flow and stormwater effects can be managed. ENGEO makes recommendations about SED, fill, and retaining. These conditions form part of the proposal.

Geo - East Block

The earthworks effects from the Proposal are presented in ENGEO at 8.3, page 34. The assessment combined a desktop study, a geomorphic walkover, and intrusive ground investigation comprising test pits with associated Scala penetrometers. The outcome of that assessment is that earthworks forming the Proposal are generally acceptable subject to further design and supervision work being undertaken by a Chartered Professional Geotechnical Engineer.

Through the application of these measures, adverse effects associated with earthworks will be managed appropriately at the RC stage. A face-value reading of section 8.3 sets out no adverse effects which are anticipated or known to be significant, impeding an application for Referral.

7.7 Summary of Effects

In summary:

- The Project will have significant positive effects for the regional economy.
- The Project will have effects on the landscape values of the valley floor that are, at most, moderate.
- All residential, commercial, and balance allotments can be serviced with threewaters, roading, power, and telecommunications, and as such, the Project will not generate adverse effects on the functioning of that infrastructure and those utilities.
- The geometry and levels of the new internal road are functional and safe. The traffic generation effects of the Project on the wider network, including the State Highway, are acceptable.
- The Project Site is subject to multiple natural hazards, being seismic shaking and displacement, liquefaction, slope stability and failure, debris flow, rockfall, and flooding. Hydraulic neutrality is being achieved by way of roof-water attenuation tanks, and rain gardens. The Project will not exacerbate any natural hazard (flood) risk on the surrounding environment and will be designed to ensure that any natural hazard (flood) risks are appropriately managed. The risk of seismic shaking and displacement, liquefaction, debris flow, rockfall, and flooding are considered to be low. The risk from slope failure below the Subject Site is low. The risk from slope failure above the Subject Site is medium.
- The Project will ensure that any effects on ecological values are minimised and where possible those values are enhanced. The quality of stormwater is being treated through rain-gardens and attenuation tanks.

The adverse impacts of the proposal are not 'out of proportion to the project's regional ... benefits' as considered under the FTAA 2024.

8.0 Statutory Documents

In accordance with section 13(4)(y)(i) of the FTAA 2024, this section provides an assessment of the Project against the relevant national policy statements and national environmental standards, being:

- National Policy Statement for Freshwater Management 2020 (amended December 2025) - **NPS-FM**.
- National Policy Statement on Urban Development 2020 (amended May 2022) - **NPS-UD**.
- National Policy Statement for Indigenous Biodiversity 2023 (amended December 2025) - **NPS-IB**.
- National Policy Statement on Electricity Transmission 2008 (amended December 2025) - **NPS-ET**.
- National Policy Statement on Natural Hazards 2025 - **NPS-NH**.
- National Policy Statement for Infrastructure 2025 - **NPS-I**.
- Resource Management (National Environmental Standards for Freshwater) Regulations 2020 - **NES-F**.
- Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 - **NES-DW**.
- Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 - **NES-CS**.

No other national direction, including the New Zealand Coastal Policy Statement, is relevant to the Project. For completeness, the National Policy Statement for Highly Productive Land 2022 (**NPS-HPL**) does not apply to the Project as the Project Site is identified as containing LUC 4 soils and therefore does not meet the NPS-HPL definition of highly productive land.

8.1 National direction

8.1.1 National Policy Statement for Freshwater Management 2020 (amended December 2025) - NPS-FM

This Project engages the NPS-FM because the Project includes works in or near natural inland wetlands identified within the Project Site, the management of stormwater discharges to receiving environments, and the potential for sediment generation during earthworks.

The Project aligns with Objective 1 of the NPS-FM by ensuring that natural and human-induced changes to freshwater are managed in a way that prioritises the health and well-being of water bodies, then the essential health needs of people, and then other consumptive uses. The wetland enhancement works (noxious weed control, supplementary native planting, and the establishment of vegetated buffers) advance Te Mana o te Wai by improving the integrity of these freshwater ecosystems.

In relation to **Policies 1, 2 and 3**, the Applicant has undertaken consultation with mana whenua, including Taranaki Whānui ki Te Upoko o Te Ika, Te Āti Awa, and Ngāti Toa Rangatira, and also Muaūpoko and Rangitāne. This consultation is detailed in the Consultation Report (Appendix 18) and has informed both the design of the wetland enhancement measures and the broader stormwater management approach. Tangata whenua values and interests have been actively considered through the design phase rather than retrofitted into the application.

Policy 6 requires that there be no further loss of natural inland wetlands and that their values be protected. The Project protects the two delineated wetlands by establishing setbacks, planted buffers, and dedicated stormwater management to avoid adverse hydrological effects. In addition to these protection measures, the Project actively enhances both wetland areas through weed control and native planting, delivering a net improvement in wetland extent and function.

Policy 7, partial loss of wetland extent is necessary for road alignment; this has been optimised through re-design to the smallest area possible. The effects management hierarchy will be applied to ensure that adverse effects are not minor or significant. The Boffa Miskell Ecology Report (Appendix 5) confirms that the proposed buffers and earthworks methodology are designed to avoid effects on hydrology and ecological function of a natural inland wetland on West Block. For the East Block, the road corridor (as specified infrastructure) will disturb land that is hydrologically linked to the downstream extent of a natural inland wetland. This may result in the partial (or complete) drainage of the natural inland wetland as part of urban development. In Sub-App, the design of the road corridor (and resulting infrastructure) will be optimised to the greatest extent possible, and the effects management hierarchy will be applied to residual effects to ensure that they are not significant.

Policy 8 concerns wetlands with significant indigenous biodiversity values. The Boffa Miskell and Blue Green Ecology reports (Appendices 5, 11) each conclude that the wetlands on site, while ecologically valuable in a degraded landscape, do not contain significant values that would engage the more stringent provisions of Policy 8.

Policy 9 concerns fish passage. The Boffa Miskell and Blue Green Ecology reports (Appendices 5, 11) each confirm that fish are not present within the on-site streams that drain into the wetland areas. As a precautionary measure, the Project includes replacing existing culverts with bottomless arch culverts to enhance fish passage and restore instream values for future migratory and resident fish populations.

8.1.2 National Policy Statement on Urban Development 2020 (amended May 2022) - NPS-UD

This Project directly engages the NPS-UD. Upper Hutt City Council is a Tier 1 local authority under the NPS-UD, recognised as part of a high-growth urban environment. The Project delivers 162 additional residential dwellings as a logical extension of the existing Tōtara Park urban area, increasing housing supply in a manner that will contribute to a well-functioning urban environment.

In relation to **Objective 1** and **Policy 1**, the Project is located adjacent to existing residential areas, will be fully serviced by reticulated infrastructure, will provide a range of housing typologies, and will be integrated with the existing roading and active transport networks.

Objective 2 seeks to ensure that planning decisions improve housing affordability by supporting competitive land and development markets. By bringing 162 homes to market in a high-demand area,

the Project directly contributes to housing supply and market competition. Property Economics (2026) at Page 23 sets out a recommended condition to ‘construct some of the proposed typologies for first-home buyers at price points 10% less than the median market rate for the same typology’. This provides an alternative home ownership pathway that makes it more accessible, and therefore affordable.

Objective 4 concerns urban environments that reduce greenhouse gas emissions and are resilient to the effects of climate change. The Project supports lower-emissions outcomes through the inclusion of a small commercial precinct that allows residents to access services within walking and cycling distance, the provision of a connected pedestrian and cycle network, and a development pattern that is accessible from existing public transport routes within Totara Park.

Policy 1 requires that planning decisions provide for a variety of housing types, sizes, and densities. The proposal offers a mix of typologies across lot sizes ranging from 176 m² to 896 m², directly addressing this requirement.

Policy 2 requires that Tier 1 local authorities provide at least sufficient development capacity in their region to meet expected demand. While Policy 2 is primarily directed at plan-making, the Project materially assists Council in meeting its demand obligations by delivering serviced sections in the short- to medium-term.

Policy 6 requires decision-makers to have particular regard to the contribution that urban development will make to a well-functioning urban environment, the provision of housing supply, and reductions in greenhouse gas emissions. Each of these factors is addressed in the application for referral.

Policy 7 requires Tier 1 authorities to set housing bottom lines. The proposal supports the Wellington Regional Policy Statement housing targets by providing significant additional capacity within the existing urban form.

Policy 8 primarily relates to plan-making and is of limited direct relevance to a referral application. However, the Project is consistent with Policy 8's underlying intent of accommodating unanticipated and out-of-sequence development that will provide significant development capacity and contribute to a well-functioning urban environment.

Policy 9 requires authorities to engage with iwi and hapū in decisions about the urban environment. The Applicant has undertaken consultation with the relevant iwi authorities as set out in Section 9.0.

The Project represents the addition of housing to an existing well-functioning urban environment, on land previously earmarked for rezoning by the Council under the now-withdrawn Plan Change 50. It contributes to the housing capacity targets set in the Wellington RPS and is consistent with the NPS-UD overall.

8.1.3 National Policy Statement for Indigenous Biodiversity 2023 (amended December 2025) - NPS-IB

Section 78 of the RMA 1991 currently places a moratorium on the obligation for territorial authorities to identify and map Significant Natural Areas (SNAs). The site is not identified as an SNA in the District Plan.

The effects of the development on indigenous biodiversity will be managed through the effects management hierarchy set out in clause 3.10 of the NPS-IB.

In light of the moratorium, the absence of mapped SNAs, and the application of the effects management hierarchy through design⁶.

The NPS-IB has limited direct applicability to this referral application.

8.1.4 National Policy Statement on Electricity Transmission 2008 (amended December 2025) - NPS-ET

The NPS-ET is engaged because the East Block is traversed by the Transpower National Grid, as shown in Figure 2. Transpower holds rights to access and maintain those Structures, pursuant to s 23 of the Electricity Act 1993. Those rights will allow Transpower to access and maintain Structures on Lot 506, from Lot 105 (road to vest). The relevant policies are Policies 11 and 12, which together address the management of effects from third-party activities near transmission lines.

In relation to **Policy 11**, the Project avoids direct effects on the National Grid. Layout and earthworks have been designed to maintain access to support structures and to avoid any encroachment on the National Grid Yard. This has been confirmed through pre-application engagement with Transpower NZ Ltd. Transpower maintains a neutral position and is continuing to engage through to Substantive Application.

In relation to **Policy 12**, the Project mitigates reverse sensitivity effects on the National Grid by specifying physical setbacks consistent with the National Grid Yard and National Grid Corridor. Building platforms within the affected area have been setback to avoid generating reverse sensitivity effects relating to routine operation, maintenance, and upgrading of the line.

The effective operation, maintenance, upgrading, and development of the National Grid are supported by the formalisation of access arrangements to towers on 'reverse to vest' and by the design of dwellings to comply with NZECP34:2001 (the New Zealand Electrical Code of Practice for Electrical Safe Distances).

The Project is consistent with the NPS-ET.

A letter from Transpower is set out in Appendix 20: Letter from Transpower New Zealand Ltd (21/05/26). Pages: 6.

⁶ The design followed an iterative, constraints-based, optimisation process.

8.1.5 National Policy Statement on Natural Hazards 2025 - NPS-NH

This assessment relies on and adopts the methods and results set out in Appendix 6: Engco Ltd (08/05/26). Cannon Point Stage 3 Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 176. and Cannon Point Stage 4 - Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 227.

The ENGEO assessment combined a desktop study, a geomorphic walkover, and intrusive ground investigation comprising test pits with associated Scala penetrometers. This work informed an engineering geological model, against which ENGEO assessed the principal geohazards: seismic shaking, slope instability, debris flow, and rockfall. Stability of the slopes above the site was analysed using limit equilibrium methods across several representative sections. Debris flow was modelled identifying a number of lots exposed to sediment-laden inundation.

Geo (West Block)

The risk from liquefaction, slope instability, rockfall, and debris flow are 'low' post mitigation.

Geo (East Block)

The risk from seismic shaking and displacement, liquefaction, rockfall, and debris flow are 'low' post mitigation. The risk from slope instability below the site are 'low' post mitigation. The risk from slope instability above the site is 'medium' and therefore requires avoidance and remediation. Avoidance has already been factored into the scheme plans, and therefore additional avoidance measures are not necessary. Mitigation measures, to the up-slope failure risk, are able to be mitigated by using SED.

These findings are directly relevant to s 106 of the RMA 1991, under which the consent authority may decline, or impose conditions on, subdivision consent where land is subject to material damage from natural hazards. They also engage the risk framework in the NPS-NH 2025. ENGEO assessed residual slope instability risk to lots below the western hillslopes as Medium and, through a societal risk assessment, concluded that risk is tolerable and able to be managed as low as reasonably practicable to a 'tolerable' level, subject to engineered mitigation and detailed design. Based on reading the geotechnical report, and upon discussions with ENGEO authors, we interpret this as being 'medium' for the purpose of the NPSNH Matrix, and significant for the purpose of s 106 of the RMA 1991.

Flooding

Relying on Vecta (2026) in Appendix 7, The flood hazard for the Project has been assessed in the Civil Infrastructure Report under the NPS-NH, using the likelihood and consequence approach in its risk matrix. The flood models considered the 1% AEP event with a climate change factor, giving a likelihood of 'Possible'. The modelled hazard is at most H1 within residential lots and H2 in the road corridors, from which the consequence is conservatively assessed as 'Minor'. The resulting risk is 'medium', which is considered acceptable for the proposed residential use subject to mitigation.

Overall, the Project does not trigger the 'avoid' Policy under the NPS-NH in relation to 'very high' natural hazard risk.

8.1.6 National Policy Statement for Infrastructure 2025 - NPS-I

The NPS-I is engaged by the infrastructure components of the Project, being the new roads, the threewaters network, and the associated natural hazard mitigation works. Roads and the threewaters are infrastructure under s 2 of the RMA 1991, and the 'additional infrastructure' definition at NPS **Clause 1.4** expressly includes a stormwater network and flood control and protection works carried out on behalf of a local authority. The upslope cutoff drains that remedy the existing flooding affecting Tōtara Park properties may fall within that flood control limb; as those works are constructed by the Applicant and vested in the Council, whether they are carried out 'on behalf of' a local authority is not settled, and they are in any event captured as part of the stormwater network.

The residential and commercial development is not infrastructure. Dwellings are a sensitive activity under **NPS Clause 1.4**. The NPS-I therefore applies to the infrastructure that services and enables the development, not to the development itself. The interface between the new sensitive activities and the existing National Grid is addressed under the NPS-ET above.

The existing Wellington Electricity overhead line crossing the Project Site will be placed underground. This is a distribution asset. Clause 1.3 excludes distribution network activities and assets managed under the NPS-ET 2008; because the NPS-ET 2008 manages the National Grid rather than distribution, that NPS applies *to all electricity transmission and distribution networks*. Therefore the effects from and on overhead lines are not considered here.

Objective (clause 2.1). The Project's infrastructure gives effect to the objective. It provides for the benefits of infrastructure (limb (a)); supports the social and economic wellbeing of the community through serviced capacity (limb (b)); enables the change of the rural environment to meet present and future needs (limb (c)); delivers well-functioning and resilient infrastructure, including a looped roading network and a dual-direction water supply to the East Block (limb (d)); and is to be delivered in a timely and efficient manner (limb (e)).

Policy 1 (benefits of infrastructure). Policy 1 requires the benefits of infrastructure, relative to any localised adverse effects, to be recognised and provided for. The Project's infrastructure supports development capacity for housing and business land (Policy 1(2)(c)); provides services essential to the functioning of the area (Policy 1(2)(d)); helps to protect and restore the natural environment through the wetland and riparian enhancement (Policy 1(2)(e)); and reduces natural hazard risk and improves resilience, in particular through the cutoff drains that remedy the existing flooding affecting Tōtara Park properties (Policy 1(2)(g)). These benefits are weighed against the localised effects of the works, which are assessed at Policy 7.

Policy 2 (operational or functional need to locate in particular environments). Policy 2 requires recognition that infrastructure may need to be located in, or to traverse, particular environments. The three waters network has a functional need to follow the terrace topography: gravity drainage dictates the split servicing solution, with the West Block connecting to the network at Tulsa Park and the East Block at Larchmont Grove, and the raingardens located at the low point of each catchment. Policy 2(2)(e) recognises the need to locate infrastructure where services are required, including in areas exposed to natural hazards, which is relevant to the stormwater and flood-management works on the valley floor.

Policy 4 (efficient and timely operation and delivery). The Project extends and connects to existing networks rather than establishing standalone systems, making more effective use of existing infrastructure (Policy 4(1)(d)). The works enable provision for increasing demand and improve resilience (Policy 4(1)(f)(i) and (ii)), including the confirmed capacity of the Tōtara Park wastewater pump station to accommodate the additional flow and the dual-direction water supply to the East Block.

Policy 6 (Māori interests). Policy 6 requires Māori interests in relation to infrastructure to be recognised and provided for, including by taking into account the outcome of engagement with tangata whenua. The engagement undertaken for the Project, including with Taranaki Whānui ki Te Upoko o Te Ika, Te Āti Awa, Ngāti Toa Rangatira, Muaūpoko, and Rangitāne, is recorded in the Consultation Report (Appendix 18) and summarised at page 64 of this report. That engagement has informed the design of the stormwater and wetland measures.

Policy 7 (assessing and managing effects of proposed infrastructure activities). Policy 7 directs how the effects of infrastructure activities are to be assessed and managed. Adverse effects have been avoided through the selection of route and method, including the alignment of the West Block road to avoid wetland reclamation (Policy 7(1)(a)); the technical and operational constraints of the works are addressed in the supporting reports (Policy 7(1)(b)); the assessment relies on recognised standards, including NZS 4404, NZS 4431, SNZ PAS 4509, NZECP 34:2001, and the Wellington Water Regional Standard for Water Services and Regional Specifications (Policy 7(1)(d)).

Policy 9 (new infrastructure and major upgrades). Policy 9(1) enables new infrastructure and major upgrades of existing infrastructure in all environments. This supports the new roads and threewaters in the rural-zoned Project Site, and complements the support for the residential development under the NPS-UD. Because the infrastructure works are likely to affect environments and values provided for in s 6 of the RMA 1991, being ss 6(a), 6(e), and 6(h), Policy 9(2) applies, and Policy 9 is to be read alongside the relevant national direction (the NPS-FM, NPS-IB, and NPS-NH), the RPS, and the NRP including PC1 and the District Plan. Where infrastructure works are not located in, and do not affect, a s 6 environment, Policy 9(3) applies and the adverse effects are, where practicable, avoided, remedied, or mitigated, as set out at from page 39.

Policies 5, 8, 10, and 11. These policies have limited or no application to the Project. Policy 5 concerns infrastructure supporting activities such as quarrying, which the Project does not involve. Policy 8 concerns the operation, maintenance, and minor upgrade of existing infrastructure; the network works are new infrastructure rather than minor upgrades, and the pump station requires no upgrade. Policies 10 and 11 are directed at decision-makers on planning instruments and so have limited direct application to this application, although the principle in Policy 11(1)(c), that primary responsibility for managing adverse effects rests with the new activity, is consistent with the management of the interface between the new dwellings and the National Grid under the NPS-ET.

The Project's infrastructure is consistent with the objective and policies of the NPS-I.

8.1.7 Resource Management (National Environmental Standards for Freshwater) Regulations 2020 - NES-F

The Project engages the NES-F because it involves activities in proximity to natural inland wetlands, the construction of structures within or near wetland areas, and earthworks that may affect freshwater environments. The relevant regulations are set out at Page 22 above, and Appendix 15: Derive Consulting Group (01/06/26). Summary of Rules under which RC are sought. Pages: 6.

In order to grant a resource consent at SubApp, the Panel must be satisfied that the urban development will:

- *contribute to a well-functioning urban environment; and*
- *provide significant national, regional, or district benefits*

and that there is *no practicable alternative location* for the activity within the area of the development or *every other practicable alternative location in the area of the development would have equal or greater adverse effects on a natural inland wetland*. The effects management hierarchy must be *applied*.

For the urban development, Regulation 45C(6) allows for resource consent to be granted only where the decision maker is satisfied that the development *contributes to a well-functioning urban environment* and *provides significant national, regional, or district benefits*, that there is no practicable alternative location within the area of the development (or every other practicable alternative location in the area of the development would have equal or greater adverse effects on a natural inland wetland), and that the effects management hierarchy has been applied. The Project is capable of meeting each of these tests, as addressed in Sections 5.0 and 7.0. On face value, the Project is inconsistent with Regulation 45C(6), this will be addressed in SubApp.

8.1.8 Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 - NES-DW

The Project Site is located on the true right bank of Te Awa Kairangi/Hutt River. Within this catchment, there are two registered drinking water abstraction points relevant to this assessment:

- Te Awa Kairangi Hutt River mainstem at Kaitoke, approximately 10 km north-east of the subject site. The intake is upstream of the subject site. The Twin Lakes, approximately 5 km east of the subject site, are not a point-source abstraction but are used to store water taken from Kaitoke that supplies Upper Hutt and parts of Wellington City; and
- The Waterloo aquifer borefield, located at or near Waterloo train station, approximately 16 km south-west of the subject site. The aquifer is downgradient from the subject site and on the opposite side of Te Awa Kairangi Hutt River. This source supplies Lower Hutt and parts of Wellington City.

Other drinking water sources in the surrounding environment are not relevant to this Project:

- Raw groundwater publicly available on Buick Street in Pito-one is collected in containers by the public and is not part of any reticulated supply; and
- The Orongorongo River source, approximately 21 km south of the site in a separate catchment, supplies Lower Hutt and parts of Wellington City.

Because the Kaitoke intake is upstream of the Project Site and the Waterloo aquifer is hydrologically separated from the Project Site by Te Awa Kairangi Hutt River, the Project cannot affect any registered drinking water source.

The Project therefore does not engage the NES-DW.

8.1.9 Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 - NES-CS

The NES-CS came into force on 1 January 2012. It deals with the functions of territorial authorities under section 31 of the RMA and does not deal with regional council functions under section 30. The NES-CS applies where a person undertakes an activity described in Regulation 5(2) to 5(6) on a piece of land described in **Regulation 5(7) or 5(8)**. It does not apply where the land is described in Regulation 5(9).

There are two relevant tests in determining the application of the NES-CS. The first relates to whether the activity is regulated under the NES-CS, and the second relates to whether the land is regulated under the NES-CS.

Test 1: Activities regulated under the NES-CS include those described in **Regulation 5(2) to 5(6)**, namely the removal of a fuel storage system, disturbing soil, subdividing land, and changing use. The Project involves earthworks (soil disturbance), subdivision, and a change of use from rural to residential. The NES-CS will therefore apply to the Project where the Project Site meets the NES-CS definition of "land".

Test 2: "Land" for the NES-CS is land described by one of the following:

- (a) an activity or industry described in the Hazardous Activities and Industries List (HAIL) is being undertaken on it;*
- (b) an activity or industry described in the HAIL has been undertaken on it; or*
- (c) it is more likely than not that an activity or industry described in the HAIL is being or has been undertaken on it.*

The Project Site is currently used as undeveloped, low-intensity grazing land. No HAIL activity is currently being undertaken. The test in (a) is not met.

In relation to (b) and (c), **Regulation 6** provides two methods for assessment: reliance on the most up-to-date information available to the territorial authority (from its dangerous goods files, property files, resource consent database or relevant registers, or material available from the regional council), or commissioning a Preliminary Site Investigation (PSI). Regulation 6(4)(a) allows the Applicant to choose which method to use.

The Applicant has relied on the information held by the territorial authority and the regional council, supplemented by historical aerial imagery sourced from retrolens.co.nz. The following matters support the conclusion that no HAIL activity has been undertaken on the Project:

- Council holds no record of contamination on its dangerous goods files, property files, resource consent database, or relevant registers in respect of the Project Site.
- The Project Site is not listed on the Greater Wellington Regional Council Selected Land Use Register (SLUR).

- The 1943 historical aerial image shows undeveloped rural land used for low-intensity arable or pastoral farming.
- The 1974 historical aerial image shows undeveloped rural land on the edge of the developing Tōtara Park area, again with no evidence of any HAIL activity.
- The 2026 modern aerial view confirms continued use of the Project Site as low-intensity grazing land, with no buildings, infrastructure, or land disturbance consistent with HAIL activities.

Based on the above, it is more likely than not that no HAIL activity has been undertaken at the Project Site. The NES-CS does not regulate the Project Site.

A Preliminary Site Investigation (PSI) will be provided with the substantive application to confirm soil quality and to support any conditions of consent that may be imposed.



Figure 6: 1943 image showing the old river terraces on the true right of Te Awa Kairangi/Hutt River. The orange arrow indicates Stage 3 West Block. (Source: RetroLenz).



Figure 7: 1974 image showing the development of Tōtara Park, with the subject site vacant. The orange arrows indicate East and West Blocks, approximately in the same reference spot as Fig 8. (Source: RetroLenz).

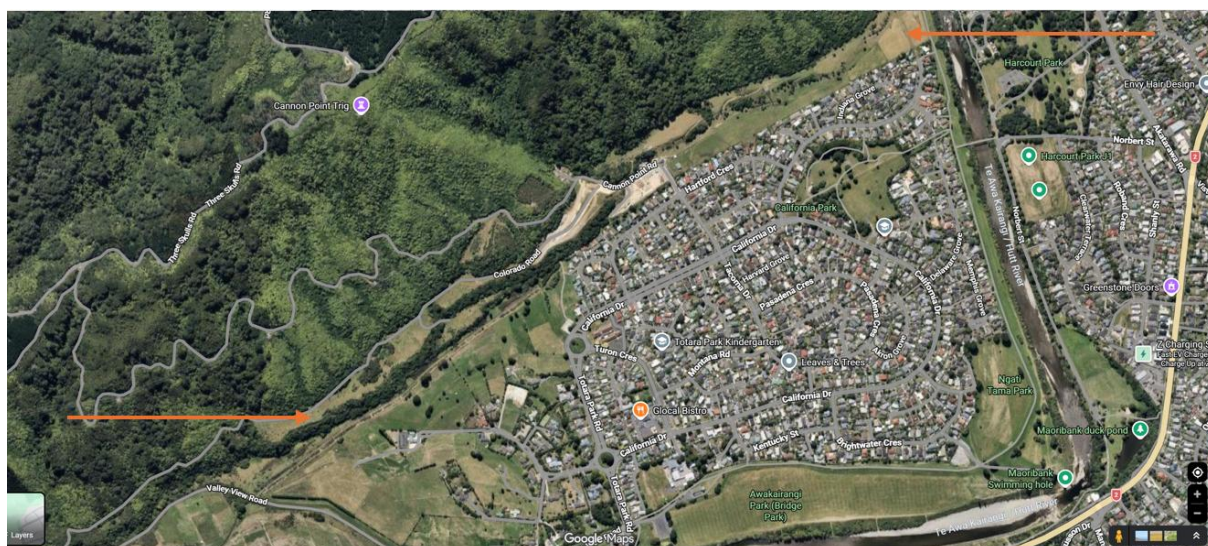


Figure 8: 2026 modern-day aerial view of the site, showing no HAIL activities present. The orange arrows indicate East and West Blocks, approximately in the same reference spot as Fig 7. (Source: Google).

8.2 Settlement Legislation

Section 13(4)(l) of the Act requires referral applications to include information about any Treaty Settlements that apply in the Project area and a summary of the relevant principles and provisions in those Treaty Settlements.

The following iwi have a Treaty Settlement with either a statutory acknowledgement area or an area of interest within the Project area:

- Taranaki Whānui ki Te Upoko of Te Ika and Te Ātiawa - Port Nicholson Block (Taranaki Whānui ki Te Upoko o Te Ika) Claims Settlement Act 2009
- Ngāti Toa Rangatira - Ngāti Toa Rangatira Claims Settlement Act 2014
- Rangitāne o Wairarapa and Rangitāne o Tāmaki nui-ā-Rua - Rangitāne Tū Mai Rā (Wairarapa Tāmaki nui-ā-Rua) Claims Settlement Act 2017

Regarding Section 13(4)(l), there are no statements in the settlement legislation that list any particular 'principles' of these Treaty settlements.

A full description of Treaty settlements is provided in the Consultation Report at Appendix 18.

9.0 Engagement Summary

Notification of the referral application was provided to the relevant requirements of s 11 of the Act, including engagement with relevant local authorities, iwi authorities, hapū, Treaty settlement entities and other relevant parties identified as potentially affected by the Project on in accordance with section 11 of the Act.

A detailed Consultation Report is provided in Wikaira (2026), at Appendix 18 which sets out a comprehensive record of the consultation undertaken to date, including the parties consulted, methods of engagement, matters raised through consultation, and how feedback has informed the Project and referral application, including the relevant requirements of section 13(4) of the Act.

Cannon Point Development Ltd remains committed to ongoing engagement and consultation as the Project progresses and through any future stages of the project under the FTAA 2024.

Letters from DOC, Transpower, and HNZPT are Appendix 19, Appendix 20, and Appendix 21 respectively.

10.0 Conclusion

This referral application is made by Cannon Point Development Ltd under the Fast-track Approvals Act 2024 in respect of Stages 3 and 4 of the Cannon Point Development at 4 and 61 Colorado Road, Tōtara Park, Upper Hutt. It seeks referral of the project for substantive approval under the FTAA process. The proposal is a comprehensively planned low-density residential development of 162 new homes and a small commercial precinct, supported by integrated threewaters and transport infrastructure and substantial ecological and landscape enhancement.

The relevant criteria for this decision-making are:

- **Section 22(1)(a):** the project is an infrastructure or development project that would have significant regional or national benefits. In considering whether the test is met, the Minister may have regard to that the project will increase the supply of housing and contribute to a well-functioning urban environment (s 22(2)(a)(iii)), will deliver significant economic benefits (s 22(2)(a)(iv)), and will support ecological protection and enhancement (s 22(2)(b)).
- **Section 22(1)(b):** referral to the FTA process would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes, and is unlikely to materially affect the efficient operation of the fast-track approvals process.

The applicant's position is that both limbs of the test are clearly met. The matters relevant to s 22(1)(a) are addressed in detail in Section 5.0 of this report, while the matters relevant to s 22(1)(b) are addressed in Section 6.

The proposal is not an ineligible activity. Section 5 of the FTAA 2024 sets out a closed list of ineligible activities, none of which apply to the development. The proposed activities (subdivision, residential and commercial land use, earthworks, infrastructure works, and ecological restoration) are ordinarily provided for under the RMA 1991 and are within the scope of the FTAA 2024 referral process.

The proposal will provide significant regional benefits, as required by s 22(1)(a). Property Economics (2026) found that the project will provide 96 FTE years of employment during peak construction, and total direct employment over the development period is estimated at 318 FTE years.

The proposal also delivers ecological enhancement of two natural inland wetlands, public access improvements connecting to the Akatarawa Forest Park, and a development pattern that supports lower-emissions transport choices. Each of these benefits, in isolation, meets the significance threshold for the Wellington region; collectively, they make a strong case for referral.

The Applicant seeks the approvals identified in Section 4.0 of this report, namely resource consents under the RMA from Upper Hutt City Council and Greater Wellington Regional Council, together with auxiliary approvals under the Reserves Act 1977 and the Wildlife Act 1953. The Applicant is not seeking a ministerial determination under section 23 of the FTAA 2024 (linear infrastructure on Māori land) or section 24 (electrical infrastructure), as the proposal engages neither.

An assessment of the appropriateness of the FTAA process, set out in Section 6.0, confirms that referral will significantly facilitate the project in a more timely and cost-effective manner than the alternative consenting pathways available under the RMA 1991. The withdrawal of Plan Change 50 by Council in December 2025 has materially constrained the conventional consenting options for the project, and the FTAA pathway provides a coherent and proportionate route to decision-making.

The Applicant has undertaken extensive engagement throughout the design and pre-application phases, including with City Council, Regional Council, Muaūpoko, Taranaki Whānui ki Te Upoko o Te Ika, Te Āti Awa, Ngāti Toa Rangatira, Transpower NZ Ltd, NZTA, and the Ministry for the Environment. This consultation has shaped the design, the servicing strategy, and the scope of the technical assessments provided with this application.

The proposal is consistent with all relevant National Policy Statements and National Environmental Standards, as set out in Section 8.0. Where statutory documents are engaged, the proposal aligns with their objectives and policies; where they are not engaged, this is identified and justified.

For the reasons set out in this report, the Applicant respectfully requests that the Minister refer the Cannon Point Development to the Fast-track Approvals process under the FTAA 2024.

11.0 Appendices

The following materials are appended to this report and form part of the application bundle.

Appendix 1: Ministry for the Environment (31/03/26). Referral application form to use for the fast-track process. Pages: 27.

Appendix 2: Records of Title (WN25B/619; WN43B/53; 1146505; 1160734; 25850; 25850; 912278; 1137297).

Appendix 3: Real Time Survey Ltd (15/06/26). Scheme Plans J2600090 SC-WEST-01 and J2600090 SC-East-01. Sheets: 18.

Appendix 4: Property Economics Ltd (01/06/26) Economic Impact Assessment (52602). Pages: 28.

Appendix 5: Boffa Miskell Ltd (13/5/26). Summary of Cannon Point Stage 3 ecological knowledge for Fast Track Referral Application. Pages: 80.

Appendix 6: Engeo Ltd (08/05/26). Cannon Point Stage 3 Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 176. and Cannon Point Stage 4 - Geotechnical Investigation for Resource Consent 10 Cannon Point Road, Craigs Flat, Upper Hutt (16998.000.002). Pages 227. (Revised 25/06/26).

Appendix 7: Vecta Ltd (12/06/26). Civil Engineering Plans Design for Approval (26014). Sheets: 19, reference 26014, and Civil Infrastructure Report (17/06/26). Pages: 77.

Appendix 8: Aymac Architecture Ltd (09/06/26). Plans. (2409). Sheets: 156.

Appendix 9: BLAC Ltd (25/06/26) Landscape and Visual Effects Memorandum for Fast Track Referral: Cannon Point Road, Totara Park, Upper Hutt (Stage 3) and 4 Colorado Road, Upper Hutt, New Zealand (Stage 4). Pages: 26.

Appendix 10: BLAC Ltd (05/06/26) Cannon Point - Stage 3 and 4 -Landscape Strategy. Pages: 22.

Appendix 11: Blue Green Ecology Ltd (19/12/24). Cannons Point Eastern Stage 4 Ecology. Pages: 43.

Appendix 12: TTAP (23/06.2026). Transport Impact Assessment. Reference NZ20250430-01-102. Pages: 82.

Appendix 13: GWRC (24/06/25). Resource Consent WGN250152 non-notified resource consent application: notice of decision. Pages 136.

Appendix 14: Manaaki Whenua Landcare Research. NZLRI Soil Class Map, excerpt from website 'Our Environment'. Printed 05/05/26. Sheets: 2.

Appendix 15: Derive Consulting Group (01/06/26). Summary of Rules under which RC are sought. Pages: 6.

Appendix 16: Derive Consulting Group (01/06/26). Assessment of legal interests registered on records of title. Pages: 7.

Appendix 17: Derive Consulting Group (01/06/26). Schedule of proposed allotments. Pages: 9.

Appendix 18: Wikaira Consulting Ltd (03/06/26). Consultation Report: Referral Application for the Cannon Point Development (Pages: 17), and Consultation Summary Log (Pages: 84).

Appendix 19: Letter from DOC (25/06/26). Pages: 6.

Appendix 20: Letter from Transpower New Zealand Ltd (21/05/26). Pages: 6.

Appendix 21: Correspondence from HNZPT (26/06/26). Pages: 2.



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