

Re: Application to EPA for Development at Mt Welcome, Pukerua Bay under the Fast-track Approvals Act 2024

Thank you for inviting Plimmerton Residents' Association to comment on the fast-track proposal by Pukerua Property Group Limited Partnership in regard to the proposed development of housing on land situated at Mt Welcome, off SH59 south of Pukerua Bay.

While the site in question is located several kilometres north of our immediate area, our community and environment will be impacted by a development of this size, both during development and construction and once the housing area is established.

We are not opposed to housing development but we do wish to see appropriate conditions placed on consents to ensure that the environment and the public are protected both during and after development.

We wish to focus our comments on three key areas of potential impact - the roading network, the existing infrastructure and the environment. We also wish to comment on the consenting period.

Background

Plimmerton Residents' Association works to serve the interests of the communities of Plimmerton and Camborne.

(For more information please refer to our website, <https://www.plimmerton.nz/>)

There were 1575 households in this area as at the 2023 census (*Stats NZ*). A major development is already underway in the Northern Growth Area at Plimmerton Farm. On completion Stage One (closest to existing facilities in Plimmerton Village) will add approximately 1000 additional residential units, effectively a 63% increase. Future phases are expected to add a further 1400 residential units. Site development and construction is expected to continue for at least the next 20 years.

We offer this context so the Panel is aware that the Mt Welcome development is not being developed in isolation but will be an additional strain on infrastructure and the environment in the surrounding area.

Comments on the Proposal

Roading network

We refer to Appendix 14, Integrated Traffic Assessment.

We have concerns regarding:

(1) The proposed temporary Tee-intersection for site access with SH59, particularly in the site development and construction period before the roundabout is built (i.e. before 110 houses have been established).

We refer the panel to the image in Appendix 14, Integrated Traffic Assessment, Appendix D Temporary Site Tee Intersection Design (*clip included below*).

The proposed temporary solution is for a turning lane across SH59 for northbound traffic. At the current access point SH59 has a 100kph limit and the hilly location means northbound vehicles (including large truck and trailer units) will have to accelerate from a standing start in the turn lane across a 100kph road with oncoming southbound traffic travelling at speed downhill.

The image also shows a tapered merge lane for northbound traffic exiting the site but no length is indicated. It does not appear to be very long, and it would appear that traffic heading north will effectively be slowed to a stop in the merge lane before joining traffic travelling at 100kph.

We ask the Panel and NZTA Waka Kotahi to consider the safety of this solution, not just based on existing traffic flows and past accident rates, but taking into account the increased risk resulting from this temporary measure and the increase in heavy traffic that will occur from the development of the Mt Welcome site and other sites in the area.

Possible actions could be :

- (a) require a reduction in speed limits in this area from the start of site development;
- (b) extend the northbound merge lane for traffic heading north from the site towards Pukerua Bay;
- (c) ensure the turn and merge lane widths and lengths are adequate for heavy construction vehicles (ie double trailer trucks);
- (d) require signage to be erected to warn traffic on SH59 of the intersection and turning traffic hazard.

(2) The reference to Grays Rd as an "Arterial" road between SH59 and Transmission Gully Motorway (SH1).

We refer the panel to Appendix 14, Integrated Transport Assessment (Stantec), Section 3.1.1:

"Grays Road to the south of the Site is classified as an Arterial Road and provides for traffic access between SH59 and the SH1 / SH58 interchange at Pauatahanui, in turn connecting with Wellington to the south and the Hutt Valley (and SH2) to the east."

Our concern is that this statement is in the context of supporting the overall accessibility of the location, and that the promotion of this route as an arterial route may encourage heavy vehicle operators to use this road to transport materials to and from the site.

We are not able to verify if Grays Rd is indeed classified as an Arterial road but note that the NZTA Waka Kotahi One Network Road Classification defines Arterial roads as *"Arterial: These roads make a significant contribution to social and economic wellbeing, link regionally significant places, industries, ports or airports and may be the only route available to some places within the region (i.e. they may perform a significant lifeline function)."*

Anyone who is familiar with Grays Road would struggle to accept that description of this narrow, winding road.

Grays Road is not a state highway and is maintained by PCC at a cost to ratepayers. It runs through suburban housing, rural and village areas. The speed limit varies between 50kph from SH59 to Mo St at the western end, then 60kph applies through to the intersection with Paekakariki Hill Rd. The limit drops to 30kph through Pāuatahanui village and school zone, with speed humps through the village.

The route is narrow, winding (with several very tight corners, posted as 20kph) and is prone to flooding. It is subject to closure during big tides and heavy rainfall. It borders the Pāuatahanui Inlet with a shared cycle and walking path on one side between the road and the harbour. There is simply no room for error.

The close proximity to the Pāuatahanui Inlet is also of concern given the potential for runoff of pollutants and sediment from loads into the harbour.

Grays Rd is signposted as not being suitable for heavy vehicles. In spite of this, heavy vehicles (truck and trailer units moving earth) use this road regularly. The long-term earthworks on Plimmerton Farm and the development of another site for housing on Grays Rd (The Glen 271 Grays Rd) have increased the volume of heavy vehicles using this fragile route. We are aware that local residents have complained to PCC about this.

We do not consider that Grays Rd is a suitable route for truck movements to and from the site and consent conditions should require that an alternative route such as SH58 be used. The references to Grays Rd as an "Arterial Road" should be checked, and

either removed from the documents or put into context as not being suitable for heavy traffic. If construction traffic is consented to use this road, consent conditions should be required to restrict heavy traffic movements, and to ensure that in the event of construction traffic damaging the road or the environment, the cost will lie with the developer or transport operator, not ratepayers.

Infrastructure

The Infrastructure Report notes

“Targeted capacity upgrades are proposed along key sections of the SH59 bulk main to address existing network constraints identified through hydraulic modelling. Several pipe upgrade options and on-site attenuation measures were evaluated; however, while additional storage can assist in managing peak wet-weather flows, it does not resolve the underlying downstream pipe capacity limitations. A storage only approach can often concentrate higher pumped discharges, worsening downstream pipe capacity constraints.”

This statement is of significant concern for communities and the environment downstream from the development (Plimmerton, Mana , Paremata, Taupō Swamp, Porirua Harbour).

Wastewater and stormwater connections to the network are already under pressure north of Paremata Bridge. The Paremata wastewater pumping station is already subject to overloading, with unpleasant odours for residents. All wastewater currently passes through a pipe on one of the bridges at Paremata. Any failure of this pipe or overloading of the wastewater pumping station could impact adversely on the Porirua Harbour.

We are concerned that consenting additional development on top of the Plimmerton Farm development will add stress to an already fragile system. We ask that infrastructure upgrades be prioritised with funding from developers before further large developments are consented.

With responsibility for Three Waters infrastructure recently passed from PCC to a new entity Tiaki Wai, the timing of future upgrades to the network is even more uncertain than before.

We ask that the Panel requests Tiaki Wai to confirm what plans (if any) are in place for upgrading the existing wastewater and stormwater networks especially at pinch points such as Mana Esplanade and Paremata Bridge, and to state how developers in the Northern Growth Area will contribute to such upgrades.

Environment

We are in receipt of the draft response from Friends of Taupō Swamp & catchment. We fully support the comments made therein.

We note that Plimmerton Farm Stage One has been fast-tracked with significant consent conditions to protect the environment, and suggest that similar be adopted for the Mt Welcome consent.

Consenting

We note that a 15 year consenting lapse date has been requested by the applicant. We believe that a 5 year consenting period is more appropriate. This allows for structured and progressive evaluation of the efficacy of consent conditions and the ability to adapt to changing environmental, economic and demographic factors, as well as any significant events such as a major earthquake or a weather event.

We further note the potential amalgamation of councils including two consenting authorities, PCC and GWRC. We trust that responsibility for monitoring of consent conditions will be clearly spelled out and contingency in the event of amalgamation is allowed for.

Plimmerton Residents' Association
31 July 2026

Mt Welcome Appendix 14, Integrated Traffic Assessment - Stantec, Appendix D Temporary Site Tee Intersection Design (*image cropped*)

