



Fast-track Consent Application

FTAA-2603-1181

Mount Welcome, Pukerua Bay, Porirua

Planning Report on behalf of Porirua City Council

31 July 2026

Author

My full name is Rory McLaren Smeaton and I hold the position of Principal Policy Planner at Porirua City Council. I hold the following qualifications:

- Bachelor of Science in Geography (University of Canterbury);
- Postgraduate Diploma in Science in Geography (with Distinction) (University of Canterbury); and
- Master of Planning Practice (First Class Honours) (University of Auckland).

I am a full member of the New Zealand Planning Institute. I have more than 14 years' experience working as a planner across local and central government and consultancy.

I have been employed by the Porirua City Council (Porirua City or the Council) since April 2020, initially as a Senior Policy Planner and now as a Principal Policy Planner, within the Climate and Environmental Planning Team. My work at Porirua City initially focused on the Proposed Porirua District Plan (now operative) including finalising proposed chapters and preparing the associated section 32 reports, summarising submissions, preparing section 42A reports and providing planning evidence to the independent hearing panel. I have also processed notices of requirements for designations and associated resource consents, represented Porirua City Council in regional spatial planning projects, and provided evidence on behalf of the council to hearing panels for regional planning processes and to the Environment Court for an appeal on the Proposed Porirua District Plan.

Relevantly, I was involved in the development of the DEV - NG - Northern Growth Development Area chapter of the Porirua District Plan. I prepared the chapter and the associated section 32 evaluation report. I also prepared the section 42A report responding to submissions and appeared before the independent hearing panel considering the submissions.

Code of Conduct

I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This planning summary report has been prepared in accordance with that Code. Unless I state otherwise, the opinions I express are within my area of expertise, and I have not omitted to consider material facts that might alter or detract from the opinions that I express.

My employer Porirua City has authorised me to prepare this report in accordance with the Code of Conduct.

Executive Summary

My report is provided on behalf of the Council in response to an invitation from the Expert Panel on the Fast-track consent application for the Mt Welcome, Pukerua Bay, Porirua project (**Mt Welcome**) under the Fast-track Approvals Act 2024 (**FTAA**) submitted by Pukerua Property Group Limited Partnership (the **Applicant**).

The Substantive Application document states that the proposal includes 949 residential allotments, an allotment and preparatory works to enable a future commercial centre, associated infrastructure, earthworks, landscaping and a new intersection with State Highway 59 (**SH59**).

Porirua City undertook planning processes under the Resource Management Act 1991 (**RMA**) to enable development of the Mt Welcome site. The site was rezoned through Variation 1 to the then Proposed Porirua District Plan with an associated Northern Growth Development Area chapter and Structure Plan included in the district plan. The proposed plan became fully operative on 1 November 2025 and is now referred to as the Porirua District Plan 2025 (**PDP**). The development of the site has the potential to have a positive effect on social and cultural wellbeing in Porirua, now and into the future, through increasing housing supply within a strategic urban development location.

The application for consent under the FTAA includes resource consents that would otherwise be sought from Porirua City under the RMA relating to non-compliances with the PDP. Attached to this report as Appendix B, I have undertaken a high-level planning assessment of the proposed development. This assessment identified that there are a number of rules and standards that have not been addressed in the application; however, I agree that, overall, the proposal requires a land use consent with a discretionary activity status and a subdivision consent with a non-complying activity status.

I have also reviewed the relevant information provided with the Fast-track consent application for the Mt Welcome project. While development of the site has the potential to deliver significant long-term benefits, I have identified a number of concerns with the Mt Welcome development as currently proposed. These relate particularly to the preclusion of future transport connections to the south identified on the Structure Plan, preclusion of an additional east-west link within the development, preclusion of delivery of medium density housing, the adequacy of the infrastructure proposed to service the development, the proposed form of the intersection with SH59 and lack of active mode access to Ara Harakeke, and the lack of detail in the proposed plans.

Specifically in relation to the preclusion of delivery of medium density housing within the development, I consider this to be contrary to a range of objectives and policies within national, regional and district level RMA documents.

Detailed written comments based on the feedback of technical staff and consultant experts are provided in the body of this document. Where relevant, the associated reports prepared technical staff and consultant experts have been provided with this report. A high-level summary of the key points raised in these comments is provided below.

Summary

General

Porirua City is a signatory to Te Wai Ora o Parirua – Porirua Harbour Accord. The objectives of Te Wai Ora o Parirua can be advanced through the development of Mt Welcome. I note that objectives 4, 7 and 9 are particularly relevant to the application.

Porirua City supported the application for the Mt Welcome project to progress through a fast-track process. The letter of support provided for the referral application identified that suitable infrastructure solutions will need to be identified as current challenges exist in Council's (now Tiaki Wai's) infrastructure networks, wastewater in particular.

Porirua City has a strategic target to reduce greenhouse gas emissions and increase the resilience of the community to climate change impacts, which requires the right development to be undertaken in the right place.

Amendments to the proposed conditions should be made to ensure that they comprehensively address the necessary matters and are robust and enforceable.

Positive effects

The proposed development has the potential to have positive economic and social effects for Porirua and the wider region by providing additional land ready for development of housing.

Cultural

The Site is within the rohe of Ngāti Toa Rangatira (Ngāti Toa). Te Rūnanga o Toa Rangatira (Te Rūnanga) is the mandated iwi authority for Ngāti Toa. Only mana whenua are able to comment on the actual and potential cultural impacts of the proposed development. The position expressed in the written comments provided by Te Rūnanga on the proposal are strongly aligned with the comments in the sections below.

Urban Design

I consider that, overall, the proposed development provides a relatively positive urban design outcome for the site and that, where the design is in accordance with the Northern Growth Development Area Structure Plan, it will contribute to a well-functioning urban environment.

Some of Council's suggestions to improve urban design outcomes during pre-application consultation have been incorporated into the application. However, there remain a number of areas where further changes should be made to ensure that the development achieves a well-functioning urban environment consistent with the outcomes set out the Northern Growth Development Area chapter of the Porirua District Plan 2025 and the associated Structure Plan. These changes also relate to the broader effects of the development on the environment and the future residents of the area, as well as mitigating potential adverse effects on the integration of the proposed development with the surrounding existing and potential future urban environment. These include providing for transport connections to the southern boundary and linkages within the site, ensuring the design outcomes for the commercial centre are achieved, relocating parks, better integrating provision for active transport, and ensuring proposed management and implementation are codified through appropriate conditions.

Subdivision design

I consider the overall subdivision layout and design shown in the scheme plan is generally in accordance with the Northern Growth Development Area Structure Plan. The subdivision design provides for a future commercial centre, adequate recreational space and number and distribution of parks, and residential allotments of generally appropriate size and shape.

However, there are areas where significant changes to the proposed scheme plan are needed to address specific concerns, including amendments to ensure that future transport connections can be achieved within and at the boundaries of the site, changes to the proposed reserve classifications, and allocation of land to the electricity and telecommunication infrastructure.

Infrastructure and servicing

Responsibility for delivery of three waters infrastructure within Porirua was transferred to Tiaki Wai on 1 July 2026. Tiaki Wai has been invited to provide written comments separately from Porirua City.

I understand that Taiki Wai is not comfortable with the proposed three waters infrastructure, including the on-site mitigation methods proposed. In particular, significant concerns have been identified with the proposed stormwater network as well as the proposed on-site wastewater mitigation.

There does not appear to be any proposed design for electricity or telecommunication infrastructure on the site or sufficient information on how electricity and telecommunication infrastructure is to be provided to each allotment. No space has been allocated within the proposed scheme plans for electricity and telecommunication infrastructure.

Parks and reserves

From a recreational perspective, the general size and layout of the reserves identified to be vested to Porirua City are generally appropriate. However, the locations of some proposed parks conflict with outcomes sought for the transport network, particularly the provision for future connections. There are concerns with the level of detail provided in the plans regarding parks, reserves, and tracks. Additional conditions of consent are needed to address these issues.

Landscape, natural character and visual amenity

The conclusions of the Landscape and Visual Effects Assessment provided with the application are generally agreed. However, the application has not addressed the effects of the cut faces proposed within the SH59 road reserve associated with the proposed intersection. Additional information, or consent conditions requiring that information, is required to address this area of the proposal.

Terrestrial ecology

The proposal includes the protection of Significant Natural Areas (SNAs) on the development site as well as buffer areas around the SNAs, as required under the PDP, which is positive. However, some of these areas are within proposed road reserve, which will not enable them to be protected through the proposed conservation covenants. Additionally, the areas of SNA027 and SNA029 within the SH59 road reserve have not been appropriately addressed through the effects management hierarchy, with no offset mitigation proposed for the loss of the area of SNA029. The ecological advice provided to Porirua City by Wildlands identifies that clearance of indigenous forest within SNA027 will further fragment this already fragmented forest patch and therefore is not consistent with the NPS-IB.

Natural hazards

The PDP identifies flood hazard areas on the development site. The application includes a flood assessment which provides mapping showing the flooding hazard risks will be appropriately managed within the site. However, based on draft comments from Tiaki Wai that I have reviewed, there are concerns that the stormwater discharges from the site may adversely affect flooding risks downstream of Taupō Swamp.

It is considered that geological hazards can largely be appropriately managed on the site through consent conditions; however, there remain two outstanding geotechnical issues relating to liquefaction potential and the proposed retention wetland embankments which have not been adequately addressed in the application.

Transport

There are several aspects of the design of the transport network that may have significant adverse effects on the wider transport network and need to be improved to ensure a safe and integrated network that provides for all users. These primarily relate to the form and function of the intersection with SH59, future transport connections within and at the boundaries of the site, providing for active and public transportation modes, and that the road network appropriately provides for bus public transport. These are fundamental issues that revised plans would need to be provided to address.

Geotechnical

Potential future adverse effects associated with geotechnical issues resulting from the large extent and volume of earthworks proposed are of concern. Geotechnical advice commissioned by Porirua City identified a number of areas where additional information was required in the application documents. Responses by the Applicant's geotechnical advisors and subsequent discussions have alleviated many of those concerns from a technical engineering perspective. Additional conditions of consent are required to address the technical matters raised.

Contaminated land

Hazardous Activities and Industries (HAIL) activities are identified as having been undertaken on the site. The application includes a Preliminary Site Investigation (PSI) and a draft Contaminated Site

Management Plan (CSMP). Conditions are proposed to require a Detailed Site Investigation (DSI) and certification of the final CSMP prior to commencement of construction, as well as a Site Validation Report following completion of any remedial works required within each stage. At a general level, the PSI and draft CSMP are acceptable, and conditions can appropriately address the management of contaminated land on the site. However, expert technical review has identified additional matters that need to be addressed in the conditions. Amended conditions are appropriate to address these matters and ensure that any adverse effects will be acceptable.

Historic heritage and archaeology

No concerns have been identified in relation to historic heritage or archaeological effects. There are no historic heritage items, extents or settings identified on the site on the Porirua District Plan 2025 planning maps. The Applicant has provided an Archaeological Assessment of Effects and Addendum to the 2019 and 2022 Archaeological Appraisal reports carried out by Clough & Associates Ltd and applied for archaeological authority as part of the substantive application. Additional conditions requiring adherence to an accidental discovery protocol and submission of an Archaeological Management Plan approved by Heritage New Zealand Pouhere Taonga are appropriate. Conditions of consent are considered necessary to appropriately integrate with rather than duplicate the archaeological authority process.

Construction management and earthworks effects

The proposed approach to management of construction effects through comprehensive management plans is generally appropriate. Some improvements are required to the draft plans provided with the application, including in relation to communication with the surrounding community. I consider requiring additional plans is appropriate, including site or stage specific plans to address particular constraints or potential adverse effects. This will require robust and enforceable conditions to ensure the management plans appropriately address all relevant adverse effects.

Reverse sensitivity

The application has not addressed all potential reverse sensitivity effects. The application documentation identifies a helicopter hanger and helipad on the site within an area that will remain with the current landowner, with the assumption that the existing land uses will also continue. The helicopter hanger and helipad are within approximately 25 metres of proposed residential allotments and therefore the noise may generate effects on future residents of those allotments. Additional assessment of the potential effects is required. Following that, possible mitigation of the effects may also be required.

Economic

The Applicant has provided an economic assessment. This states that construction of the proposal and post-construction activity will contribute to GDP and job creation, while the proposal itself will increase the range and affordability of new greenfield housing. It concludes that there will be significant benefits to Porirua City and Wellington region. No technical review of this assessment has been commissioned; however, I consider that the conclusions relating to positive economic effect are likely to be reasonable.

However, it is noted that there are some assumptions made in the assessment that are not explained and may affect the scale of the positive economic benefits of the of proposal, particularly in relation to the affordability of housing in the district. Additionally, the economic costs of the proposal have not been quantified or assessed.

Objectives and Policies

Overall, I consider that, while the proposed development is consistent with some aspects of the PDP, it is inconsistent with or contrary to a number of key objectives and policies of the relevant planning documents. In particular, the proposed development is contrary to the Northern Growth Development Area chapter in the Porirua District Plan.

There are a range of matters where further assessment may be required or additional or amended conditions are necessary in order to ensure that the effects of the proposed development will be acceptable and the outcomes sought for a high-quality development to be achieved, including as expressed in the Porirua District Plan 2025, are realised.

However, in my view, not all concerns and issues raised can be addressed through consent conditions. In these cases, additional information or revisions to the proposed plans may be required from the Applicant. If the necessary information and appropriate revisions are not provided, the potential effects may be significant enough that partial or full decline of the consents sought may be appropriate.

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1 Introduction

An application has been submitted to the Environmental Protection Authority under the Fast-track Approvals Act 2024 for the Mt Welcome, Pukerua Bay, Porirua project. This report provides an assessment of the application from a technical planning perspective.

If this application were to follow a standard resource consent process, having regard to what is proposed to occur within the jurisdiction of Porirua City, the following key matters would be considered through an assessment of effects:

- Positive effects
- Cultural
- Urban Design
- Subdivision design
- Parks and reserves
- Landscape, natural character and visual amenity
- Ecology
- Natural hazards
- Infrastructure and servicing
- Transport
- Geotechnical
- Contaminated land
- Historic heritage and archaeology
- Construction management and earthworks effects
- Reverse sensitivity
- Economic

These matters have been considered in this report, and, where appropriate, comments on the set of draft conditions proposed by the Applicant have been made.

A number of the comments in this report have been previously shared and discussed with the Applicant to assist in resolving any outstanding issues with the proposed development.

Following that process, there have remained some fundamental disagreements with the technical information provided by the Applicant. The Council has provided copies of technical reviews. In places, this report has summarised the reviews undertaken, any issues raised, responses from the Applicant, and any residual concerns.

2 Location and Background

Porirua is located within the Wellington region, north of Wellington City. Porirua had a population of around 62,000 people in 2021 and around 22,800 dwellings. Porirua is experiencing growth, with the population projected to reach around 89,000 by 2051.

In terms of housing supply, the Wairarapa-Wellington Horowhenua Region Housing and Business Development Capacity Assessment (August 2023) states that there has been an undersupply of new housing in Porirua since 2014. While housing affordability has been stabilising, with house prices decreasing, there remains an undersupply of housing which is contributing to increasing rents. Within Porirua, rents are increasing faster than incomes are rising.

Porirua City Council is a tier 1 local authority under the National Policy Statement on Urban Development 2020 (**NPS-UD**), which means Council has additional requirements to provide sufficient development capacity.

The 'Mt Welcome' site is approximately 206 hectares of land located to the south of the existing urban area at Pukerua Bay. The location of the Mt Welcome site within the wider northern-Porirua context from Plimmerton to Pukerua Bay is shown in Figure 1 below. The site is not within the landward extent of the coastal environment as identified on the Porirua District Plan 2025 maps.

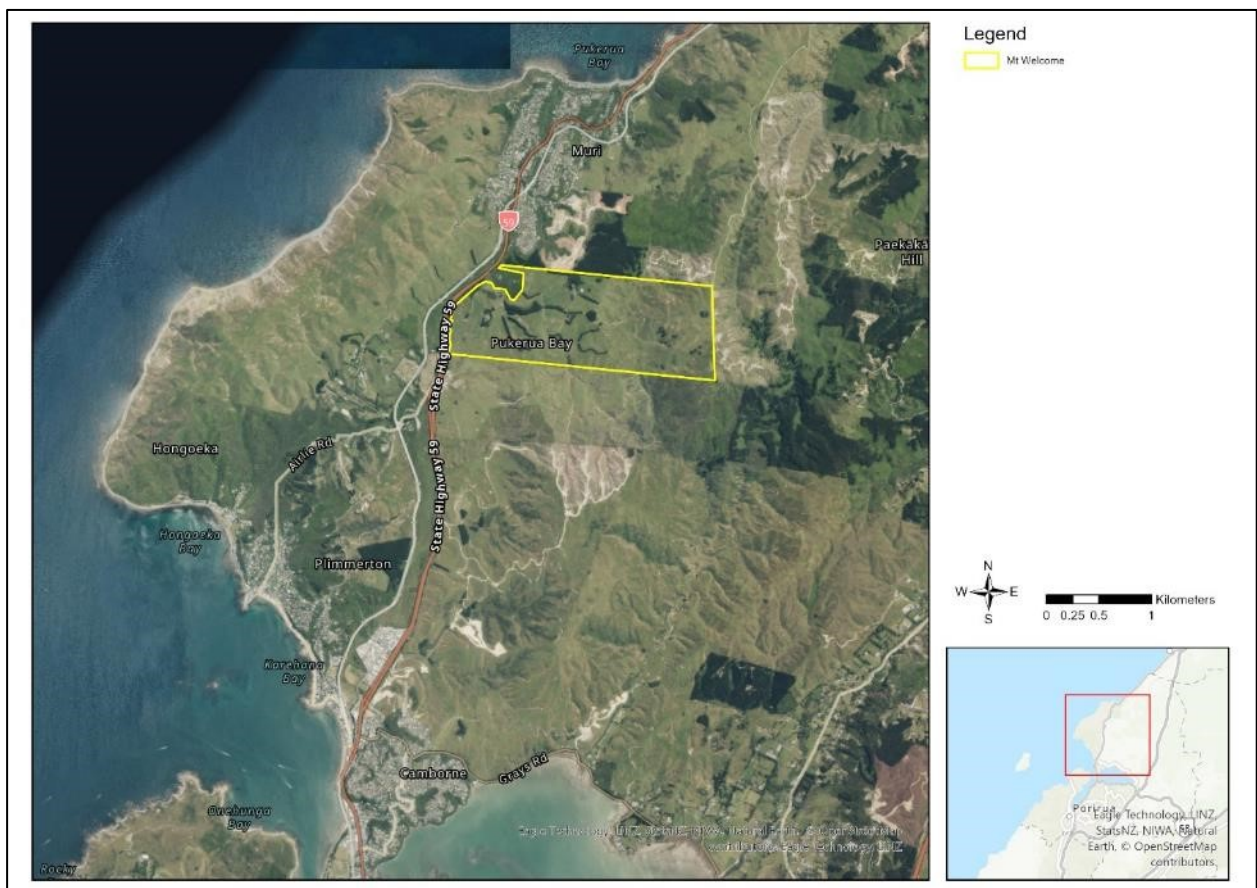


Figure 1: Location of Mt Welcome
Source: Porirua City Council GIS data.

The zoning of the Mt Welcome site was changed through Variation 1 to the then Proposed Porirua District Plan. Variation 1 formed part of the Council's Intensification Planning Instrument (IPI) required under the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 (**RMA-EHS**). Variation 1 included rezoning land in the northern part of the Northern Growth Area from Future Urban Zone and Rural Lifestyle Zone to Medium Density Residential Zone and Neighbourhood Centre Zone (see Figure 3 below). As part of the rezoning a new Northern Growth Development Area (**NGDA**) chapter

was also included in the district plan with an associated structure plan to guide development in the area (see Figure 4 below). Variation 1 became operative on 20 December 2023.

The new zoning and structure plan was intended to provide for urban development including housing, a commercial area, an integrated transport network providing for all modes and connections to the wider network, water sensitive design to protect sensitive receiving waters, and protection and enhancement of Significant Natural Areas (**SNAs**). The NGDA chapter in the Porirua District Plan 2025 (**PDP**) includes a comprehensive planning framework which included specific objectives, policies and rules which integrated with the wider district-wide and zone provisions. The Northern Growth Development Area Structure Plan is included in the chapter which sets out the intended urban form of the development of the Development Area.

The proposed Mt Welcome development is located in the southern part of the NGDA. I understand from the information in the application documentation that the proposed development includes¹:

- 949 residential allotments sized between 316m² to 2386m² (to enable 949 future dwellings) with an average lot size of close to 523m²;
- an allotment and preparatory works to enable a future commercial centre;
- associated infrastructure including wastewater (including wastewater storage facilities), stormwater, water reticulation, roading, and pedestrian and cycling trails;
- earthworks to establish the required finished surface levels for building platforms, roading, parks and drainage;
- landscaping; and
- new intersection with State Highway 59.

The development proposal does not include the whole site, with a large area of the residential-zoned land within the Lucas Block proposed to be retained by the current owner and the existing farming land uses maintained.

2.1 Northern Growth Area versus NGDA

It is important to note that the terms 'Northern Growth Area' and 'Northern Growth Development Area' are not interchangeable. The Northern Growth Area includes the entirety of the area from Plimmerton to Pukerua Bay that has been identified for future growth within the Porirua Growth Strategy (see Figure 2 at 4.1.1). The NGDA is a subset of the Northern Growth Area. It is the area identified in the Porirua District Plan and covered by the NGDA chapter and Structure Plan (see Figure 3 at 4.4.2).

¹ Fast Track Substantive Application, Mt Welcome, Pukerua Bay, Porirua, March 2026, page 7

3 General Comments

High-level general comments on the proposed development are set out in the sections below. These relate to Te Wai Ora o Porirua – Porirua Harbour Accord, housing needs in Porirua, climate change, and the need for clear and enforceable conditions for any approved consents.

3.1 Te Wai Ora o Porirua – Porirua Harbour Accord

Te Wai Ora o Porirua – Porirua Harbour Accord (the Accord) was signed on 6 February 2025 by the five accord partners: Te Rūnanga o Toa Rangatira (acting on behalf of Ngāti Toa), Porirua City Council, Greater Wellington Regional Council, Wellington City Council, and Wellington Water Limited. The agreement unites key partners in a shared commitment to restoring the ecological, cultural, and environmental integrity of the harbour. While not a part of the statutory planning framework, the Accord provides a lens through which to view the entire Mt Welcome application.

The He Moemoeā (vision) of the Accord is:

Ko te ora me te mauri o Te Awarua-o-Porirua ka whakahokia, ā, ko ōna wai ka noho hauora, ka toitū mō ngā reanga kei te heke mai, me te hunga e noho ana, e mahi ana, e tākaro ana, e hono ana rānei ki te whanga.

The health and mauri of Te Awarua o Porirua is restored, its waters are healthy and sustainable for future generations and for those who live, work, play or connect with the harbour.

The vision is supported by three purpose statements, 10 objectives and 22 principles.

The objectives of the accord are relevant to the development of Mt Welcome as the application site includes large areas which drain to the Taupō Stream and Kakaho Stream, which in turn discharge to Te Awarua o Porirua. The objectives of the Accord are:

- 1. The Accord seeks to achieve Te Mana o Te Wai and other relevant objectives of the National Policy Statement for Freshwater (NPS-FM);*
- 2. The role of tikanga is upheld and guided by mana whenua through the practice of kaitiakitanga;*
- 3. Restoration of the harbour provides for the safe and sustainable gathering of mahinga kai; and*
- 4. A water sensitive catchment is established, where natural water systems are integrated with the built environment to minimise environmental degradation and promote sustainable water outcomes;*
- 5. The Harbour's terrestrial, aquatic and marine ecology and biodiversity is restored and protected;*
- 6. Freshwater and coastal water quality in the catchment is restored and protected;*
- 7. Current and future development and growth must contribute to the protection and restoration of harbour health;*
- 8. Efforts to restore the health of the harbour must also support efforts to mitigate and adapt to the effects of climate change; and*
- 9. Creative and innovative infrastructure minimises degradation to, and protects the health of, the harbour.*
- 10. Equitable partnership is developed and maintained through the life and application of The Accord.*

The objectives of Te Wai Ora o Porirua can be advanced through the development of Mt Welcome. Objectives 4, 7 and 9 are particularly relevant to the application.

Where relevant, the substantive comments on the application in the sections below include reference to the relevant objectives of Te Wai Ora o Porirua.

3.2 Addressing housing needs in Porirua

Porirua has a shortage of available housing. This has contributed to high land and housing costs within the city. In particular, there is a lack of affordable housing, with Porirua having some of the highest rents in New Zealand. This is described in the Wairarapa-Wellington Horowhenua Region - Housing and Business Development Capacity Assessment August 2023 (HBA), which concludes that:

...there is a significant shortfall in the number of houses currently being supplied to the market to meet demand. This undersupply of new dwellings continues to be a key contributor to ongoing housing affordability issues in Porirua.

While the HBA notes that housing affordability has stabilised and improved slightly from the levels experienced in 2018 – 2022 (because of house prices declining between late-2022 and early-2023, combined with slightly increased median incomes), rents have continued to rise above historically high rates of inflation. As such, there has been a decline in housing affordability for people renting which indicates a continuing shortage of housing supply within Porirua.

As identified in section 4.1 below, Council has been planning for growth within the Northern Growth Area for many years, and development of the area for predominantly residential activities is a key component of Council's response to the ongoing housing affordability issues in Porirua. This resulted in the Council including rezoning of the area through Variation 1 of the Proposed Porirua District Plan which introduced the DEV - NG - Northern Growth Development Area chapter. This is discussed in more detail in section 4.4.2 below.

3.3 Climate change

Porirua City declared a climate emergency in June 2019, and launched a three-year Climate Change Strategy, Rautaki o Te Ao Hurihuri in December 2020. This strategy was refreshed in June 2026.

As described on the Porirua City website², the council is committed to reaching net zero greenhouse gas (GHG) emissions by 2050. The Council's current focus areas on the path to net zero include:

- Reducing Council emissions from waste and property;
- Optimising and changing our vehicle fleet to low emissions alternatives; and
- Being accountable by monitoring and reporting on our emissions.

Porirua City is also working to better understand the impacts of climate change on the district so that it can prepare and adapt. Development that occurs now will have ongoing consequences for the climate and our ability to cope with the consequences of climate change in the future.

Within this context, it is important that greenfield growth within Porirua occurs in a way that reduces the current and future impacts on climate change and provides for increased resilience of the community in a climate-impacted world.

In this respect, the proposed development is in a strategic location that provides good access to existing public transport infrastructure and has generally been designed to provide for multi-modal transport options within the site. This will assist to reduce GHGs from transport of residents in the future. However, as discussed in section 6.10 below, the proposed active and public transport infrastructure could be significantly improved to ensure that future residents are encouraged to use active and public as much as possible rather than private vehicles, including through the incorporation of a connection to Ara Harakeke pathway. This is discussed in detail in sections 6.3.3.9 and 6.10 below.

Climate change is leading to more frequent and severe extreme weather events, causing increased flooding and landslips. The proposed development will need to take into account predicted changes in future rainfall and the impact of increasing impermeable surfaces on stormwater flows, to avoid exacerbating vulnerability to flooding and other natural hazards impacted by climate change.

Reducing GHG emissions from development as much as practicable also includes those generated during the construction phase, for example through reducing the carbon footprint associated with off-site soil disposal.

Potential to reduce GHG emissions are discussed in the sections below where relevant.

3.4 Draft Code of Development Standards

Porirua City has recently released a draft Code of Development Standards (**CODS**). The draft CODS seeks to replace the existing Code of Land Development and Subdivision Engineering 2010. The revised CODS are intended to better align with the PDP and reflect the most recent New Zealand Standards relating to land development and subdivision, water infrastructure technical standards and specifications, and legislative updates.

² Available here: <https://porirua.govt.nz/your-council/city-planning-and-reporting/te-ao-hurihuri-changing-world/>

The Cods sets out Porirua City's subdivision and development standards. The document addresses:

- Information requirement for resource consents
- Earthworks
- Stormwater
- Water supply
- Wastewater
- Transport
- Parks, reserves and landscaping
- Electricity, telecommunications, gas

Submissions are being received on the draft Cods from 30 June 2026 to 28 August 2026. Decisions are expected to be made in December 2026.

While the new Cods document may not be finalised before the decision on the Mt Welcome fast-track approvals are due, the draft Cods may be useful in the consideration of appropriate consent conditions.

3.5 Consent conditions

High-level comments on the draft consent conditions are provided in section 7 below. More detailed comments on consent conditions are also contained in the relevant technical review memoranda. Where references to proposed consent conditions are made in the body of this report these relate to the version provided on 2 July 2026.

At a high level, any conditions of consent will require careful drafting to avoid any future issues for monitoring and compliance undertaken by Porirua City, and to ensure that the outcomes sought to be achieved are realised.

Additionally, conditions will need to be carefully worded to ensure that any inconsistencies in plans, reports and design drawings are not carried forward into detailed design and construction phase plans.

4 Planning Framework

4.1 Strategic Planning Context

The strategic planning context of the area within which the proposed development is located is set out in a range of local and regional planning documents. The most important of these are:

- Porirua Growth Strategy 2053; and
- Wairarapa-Wellington-Horowhenua Future Development Strategy.

These documents and their relationship to the proposed development is discussed in the sections below.

4.1.1 Porirua Growth Strategy 2053

The Porirua Growth Strategy 2048 was adopted in 2019 as a guiding framework for Porirua. It is intended to shape and influence the 'why' and 'where' of the physical development of the city over a 30-year timeframe. The refreshed Porirua Growth Strategy 2053 (the 'Growth Strategy') retains the key focus areas of the strategy but has been updated to consider the changes since its adoption and prepare the Council for the next steps for urban growth within the city.

The Porirua Growth Strategy built on previous growth planning documents developed by the Council, including the Porirua Development Framework 2009 and the Northern Growth Area Structure Plan 2014. The Porirua Growth Strategy 2048 included a spatial map showing potential growth areas and change over time, which included the Northern Growth Area. This is reproduced in Figure 2 below.

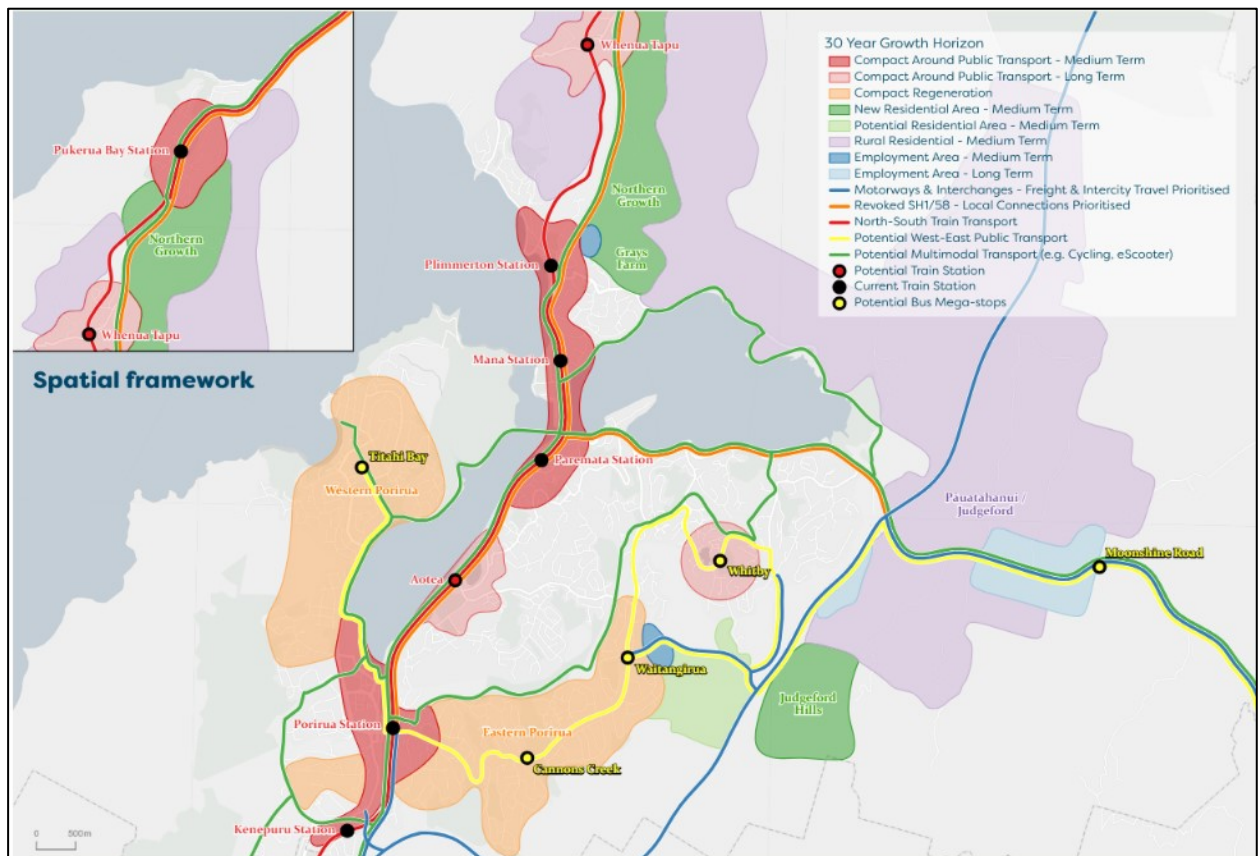


Figure 2: Spatial Framework for Porirua
Source: Porirua Growth Strategy 2048

Six principles and associated directions are set out in the Growth Strategy. The six principles for shaping and guiding growth in the city are:

- A diverse and inclusive city;
- A harbour-centred city;
- A compact and liveable city;
- A connected and active city;
- A city of opportunities and prosperity; and
- A resilient city.

In terms of the site, the area was identified in the Porirua Growth Strategy 2048 spatial framework in an approximate manner as a 'New Residential Area – Medium Term', as shown in Figure 2. The spatial framework itself is not included in the refreshed Growth Strategy 2053; however, Mt Welcome is identified as being part of the Northern Growth Area in the Porirua Growth Strategy 2048 and zoned for residential development in the PDP. The Porirua Growth Strategy 2053 states the following:

The Northern Growth Area

The Northern Growth Area (NGA) is 1036 hectares of greenfield land between Pukerua Bay and Plimmerton adjacent to State Highway 59 (formerly State Highway 1). Part of the NGA has an existing specific zone (Plimmerton Farm Zone). The remainder has been identified as being suitable for residential development as a Future Urban Zone in the PDP. The NGA has the capacity for up to 4000 houses along with supporting infrastructure and services.

The NGA is made up of seven major land holdings. Plimmerton Farm, the largest land holding at 384 hectares, is zoned for residential development. The Minister for the Environment approved Plimmerton Farm – Stage One for referral to an expert consenting panel under the Covid-19 Recovery (Fast-track consenting) Act 2020.

Two further land holdings, Mt Welcome Station and the Muri Road Block, are also going through a rezoning process known as the Northern Growth Development Area (NGDA). The NGDA has the potential for 1500 houses along with supporting commercial development in a neighbourhood centre. A structure plan has been prepared to guide this development and is proposed to be incorporated into the PDP

The process for rezoning Mt Welcome and incorporating the structure plan in the PDP was completed in 2023 and is discussed in more detail in section 4.4 below.

4.1.2 Wairarapa-Wellington-Horowhenua Future Development Strategy

The Draft Wairarapa-Wellington-Horowhenua Future Development Strategy was released in October 2023, with hearings held in December 2023. The final Wairarapa-Wellington-Horowhenua Future Development Strategy (**FDS**) was approved on 19 March 2024 by the Wellington Regional Leadership Committee.

The Northern Growth Area is identified as a 'Priority Development Area' in the FDS. As noted above, Mt Welcome forms part of the northern area of the wider Northern Growth Area. The FDS states in relation to the Priority Development Areas that:

These are the region's currently identified opportunities for large mixed-use housing and commercial development. Priority Development Areas are complex in nature, where partnership between local and central government and mana whenua is essential due to scale, pace, complexity.

Specifically in relation to the Northern Growth Area, the FDS notes that there is capacity for up to 1,500 dwellings in the NGDA, while topography and other constraints will likely result in variable density within the Northern Growth Area.

4.2 National Policy Statements

The Mt Welcome application includes assessment of the provisions of the National Policy Statement on Urban Development (**NPS-UD**), National Policy Statement for Natural Hazards (**NPS-NH**), National Policy Statement for Indigenous Biodiversity (**NPS-IB**) and the National Policy for Freshwater Management (**NPS-FM**). Given the proposed activities, I consider that the National Policy Statement for Infrastructure 2025 (**NPS-I**) is also relevant.

The NPS-UD was implemented within Porirua through Variation 1 to the PDP. The NPS-FM as it was at the time was also considered to the extent it was relevant through the development of the PDP. However, the NPS-I and NPS-IB have not been implemented through the PDP.

The site is located completely outside of the landward extent of the coastal environment, as identified on the PDP maps. As such, the New Zealand Coastal Policy Statement 2010 is not directly relevant.

4.3 Regional Policy Statement

The Regional Policy Statement for the Wellington Region provides an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region.

4.3.1 Operative RPS 2013

The Regional Policy Statement for the Wellington Region 2013 (**RPS**) was made operative in April 2013. It was considered in detail through the development of the Proposed Porirua District Plan and Variation 1 to the Proposed Porirua District Plan and the Panel's decisions and recommendations. The PDP therefore gave effect to the operative RPS as it was at that time.

4.3.2 Proposed Change 1 to the RPS

Proposed Change 1 (**PC1**) to the RPS was prepared to implement the NPS-UD and to initiate implementation of the NPS-FM. Issues relating to climate change, indigenous biodiversity and high natural character were also addressed. Parts of PC1 proceeded through the Freshwater Planning Process and parts followed the standard Schedule 1 process. PC1 was publicly notified in August 2022. Further submissions were received in December 2022. Hearings began in June 2023. Decisions were made in September 2024. Parts of PC1 that proceeded under Schedule 1 remain under appeal.

PC1 was notified prior to decisions on the PDP. The hearing panel for the PDP stated:

GWRC notified Change 1 to the Regional Policy Statement (RPS Change 1) on 19 August 2022. Submissions and further submissions on RPS Change 1 closed on 14 October 2022 and 9 December 2022 respectively. Hearings of those submissions commenced on 26 June 2023 and we understand are scheduled to continue until the end of March 2024. RPS Change 1 is a substantial document in its own right. We will give it what weight we consider it deserves taking account of the relatively early stage of the hearing process it has reached and the availability of other higher order guidance/ direction, among other things.³

As such, while the provisions of PC1 were considered to a degree through the Panel's decisions and recommendations on the Proposed Porirua District Plan and Variation 1, it has not fully been given effect to in the PDP. As such, PC1 to the RPS will need to be considered in full for the Mt Welcome application.

4.4 Porirua District Plan

The Proposed Porirua District Plan was initially notified in August 2020. Variation 1 was notified in August 2022. Decisions were notified in December 2023. The Porirua District Plan 2025 (**PDP**) became fully operative on 1 November 2025 following resolution of all appeals.

4.4.1 Zones

The Mt Welcome site is identified by the black outline in Figure 3 below in relation the zones in the PDP. This shows that the zoning is largely Medium Density Residential Zone (**MRZ**) with an area of Neighbourhood Centre Zone (**NCZ**) near the western boundary and Rural Lifestyle Zone (**RLZ**) in the east. The zone chapters are set out under Part 3: Area Specific Matters of the PDP.

³ Hearing of Submissions and Further Submissions on Proposed District Plan and Plan Change 19 to the Operative District Plan Report and Decisions of Independent Commissioners, Report 1 Introduction, para. 54.

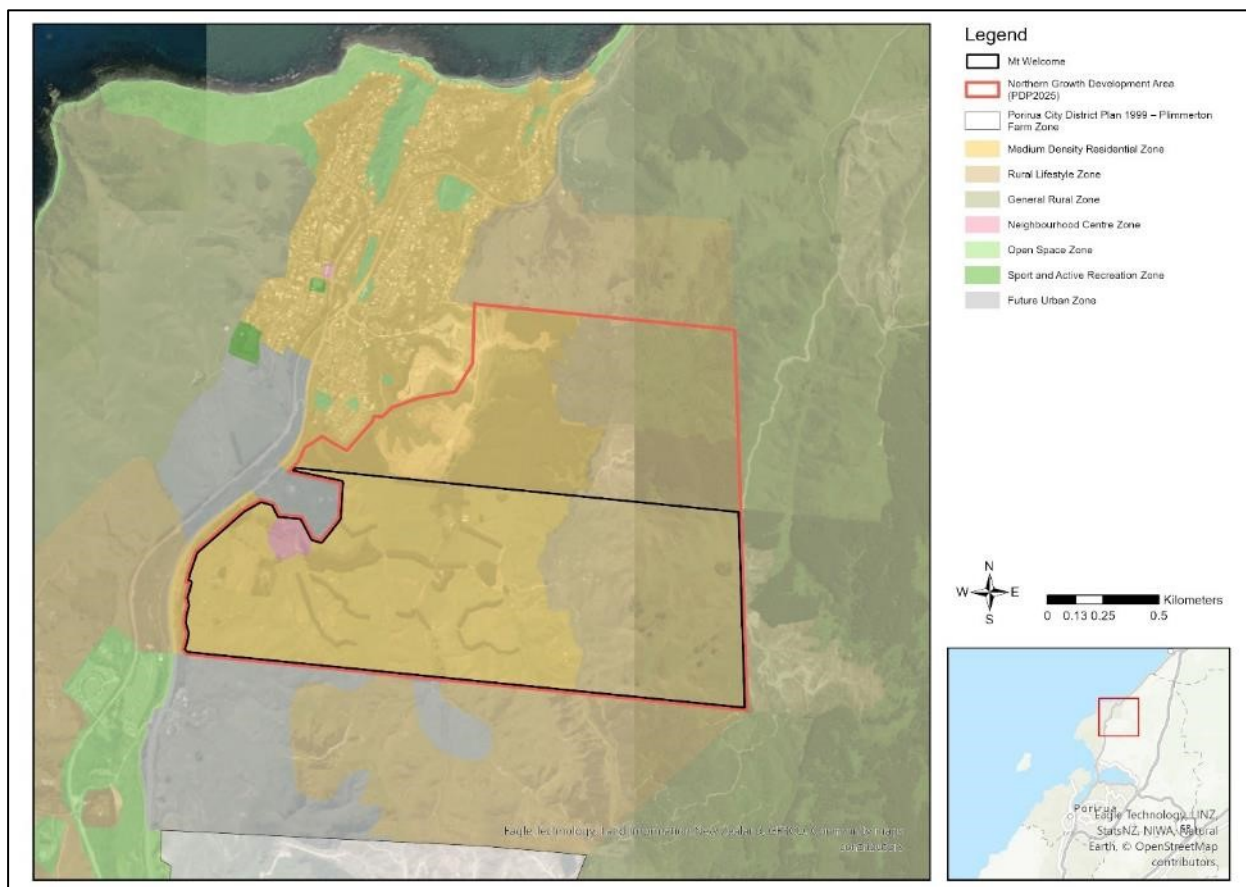


Figure 3: Porirua District Plan 2025 zones

4.4.2 Northern Growth Development Area

The NGDA was introduced to the PDP through Variation 1. This 'up-zoned' the area from Future Urban Zone (FUZ) and RLZ to the zoning now shown in the PDP maps. The area of the NGDA is shown above in Figure 3 by the red outline.

The rezoning of the NGDA followed the process set out in the FUZ chapter of the PDP, with a structure plan developed for the area in accordance with Appendix 11 of the PDP and a new development area chapter introduced into the PDP to manage development within the Development Area (the 'DEV-NG-Northern Growth Development Area' chapter). The DEV-NG-Northern Growth Development Area chapter contains objective, policies and rules to ensure the development within the area occurs in accordance with the structure plan.

The objectives of the DEV-NG-Northern Growth Development Area chapter provide the key direction for development of the area. The objectives are:

DEV-NG-01 Purpose of the Northern Growth Development Area

The Northern Growth Development Area contributes to achieving feasible development capacity to meet Porirua City's medium to long-term housing needs.

DEV-NG-02 Planned urban built environment of the Northern Growth Development Area

Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:

1. *A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan;*
2. *A built urban form that responds to the natural landform;*
3. *A quality living environment that is connected, accessible and safe;*
4. *A high quality public open space and recreation network that is easy to access and meets the needs of the local community;*
5. *Predominantly medium density housing with a variety of housing types, sizes and tenures;*
6. *A neighbourhood centre that serves the needs of the local community;*

7. An urban form that is integrated with the transport network, and encourages public and active transport modes while minimising reliance on private vehicles; and
8. Development that maintains and protects and, where possible, enhances ecological values, and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments.

DEV-NG-O3 Provision of infrastructure

Infrastructure with sufficient capacity is provided at the time of subdivision for urban use and is developed in an integrated, efficient and comprehensive manner to meet the planned needs of the Northern Growth Development Area.

The policies provide the detail on how the objectives are to be achieved. Importantly, policy DEV-NG-P4 directs that subdivision, use or development that is not in accordance with the Structure Plan should be avoided where it results in certain inappropriate outcomes.

The NGDA Structure Plan is contained in DEV-NG-Figure 1 in the DEV-NG-Northern Growth Development Area chapter of the PDP. The Structure Plan is shown below in Figure 4.

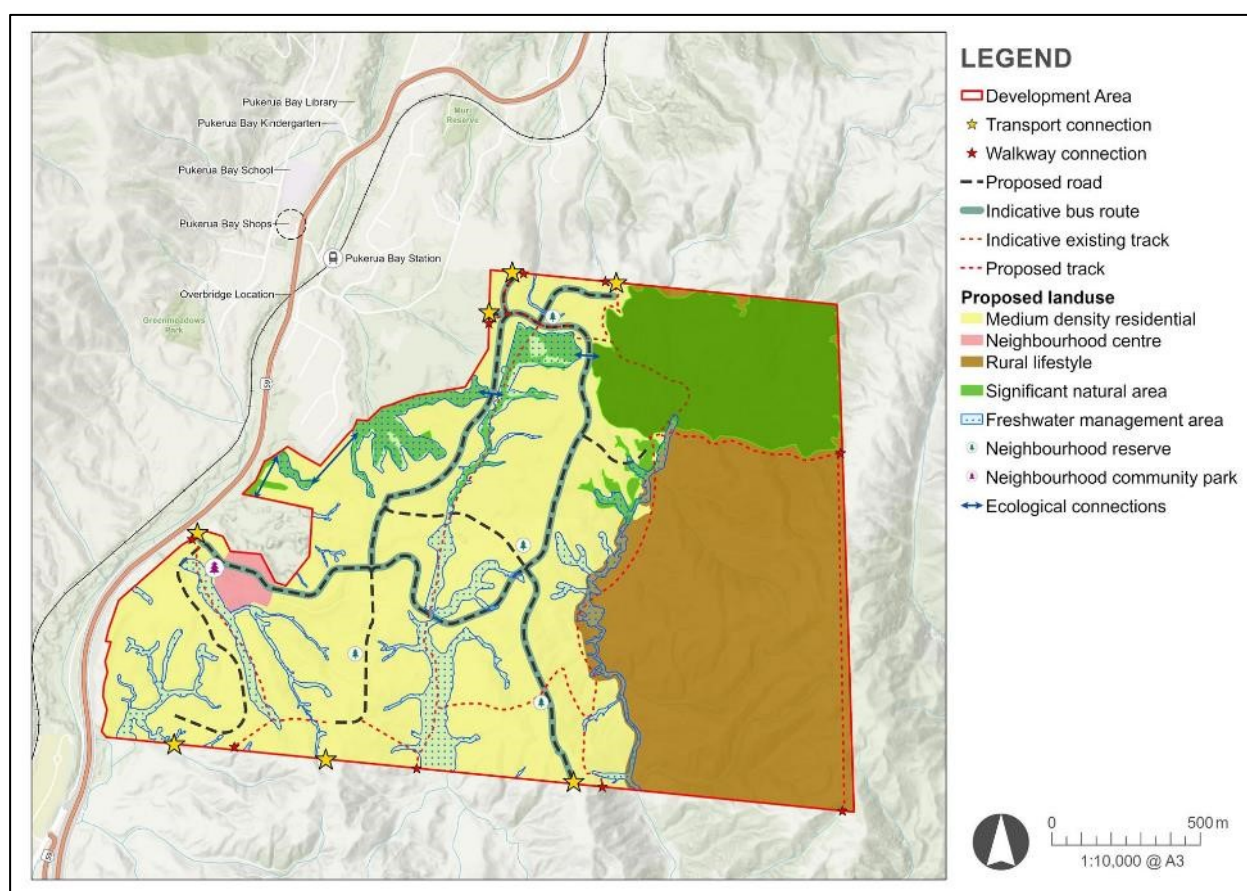


Figure 4: Northern Growth Development Area Structure Plan

The Structure Plan was developed by Boffa Miskell in conjunction with a range of other technical specialists and the landowners as part of the Variation 1 process. An Urban Design Assessment of the Northern Growth Development Area (Boffa Miskell, 2022) provided the basis for the Structure Plan and contains explanation of the various components.⁴

Further information on the structure planning process, the DEV-NG-Northern Growth Development Area chapter of the PDP, and the information that informed it, is contained in the document *Section 32*

⁴ Available here: https://storage.googleapis.com/pcc-wagtail-media/documents/Boffa_Miskell_Limited_2022_Urban_Design_Assessment_Northern_Growth_Area_Plan_Variation.pdf

Evaluation Report Part B: Northern Growth Development Area which is available on the Porirua City website.⁵

4.4.3 Plan Change 1 and 2 to the PDP

Porirua City has recently been granted exemptions under section 80W(2) to the 'plan stop' requirements in section 80P of the RMA, for Plan Change 1 and Plan Change 2 to the PDP.

Plan Change 1 relates to minor and technical tidy-up amendments that correct drafting errors, omissions, and outdated references to improve clarity, consistency, and workability across the Porirua District Plan. The changes do not alter policy intent, zoning outcomes, development capacity, or activity statuses, but are intended to resolve interpretation issues that have led to unnecessary consenting.

Plan Change 2 is a targeted corrective package that improves clarity and consistency in the Porirua District Plan 2025 by fixing unworkable provisions and provisions that have led to unintended or inefficient outcomes.

Porirua City Council approved notification of Plan Change 1 and Plan Change 2 to the PDP on 11 December 2025. With the exemptions now granted, Porirua City expects to notify Plan Change 1 and Plan Change 2 by the end of 2026. Consultation under Clause 34 of the Resource Management Act has begun for Plan Change 1. More information on the plan changes, including the proposed changes to the text of the PDP in full, is available on the Porirua City website.⁶

While the plan changes will not apply to the proposal, Plan Change 2 includes some minor changes to provisions in the DEV – NG – Northern Growth Development Area chapter which provide clarification of clause 3 of DEV-NG-P4 and the application of DEV-NG-R3.

⁵ Available here: https://storage.googleapis.com/pcc-wagtail-media/documents/FINAL_Section_32_Evaluation_Report_-_Variation_1_Part_B_-_Northern_Growth_Development_.pdf

⁶ Available here: <https://porirua.govt.nz/your-council/city-planning-and-reporting/district-plan/district-plan-2025/minor-changes-and-improvements-to-the-district-plan/plan-change-1-and-2/>

5 Assessment of the Porirua District Plan 2025 rules and standards

The application includes an assessment of the rules and standards in the Porirua District Plan 2025 at Appendix 4. I agree that, overall, the proposal requires a land use consent as a discretionary activity and a subdivision consent as a non-complying activity.

However, I consider that the applicant's assessment of the rules and standards in the Porirua District Plan 2025 lacks detail and overlooks requirements for information to be provided with the application. As such, an assessment of the relevant rules and standards in the Porirua District Plan 2025 is attached at Appendix B. This identifies where there are differences to the assessment contained in the application.

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

The requirements of the INF-Infrastructure chapter are of particular concern. In some cases, sparse information is provided on significant components of the proposed infrastructure to support the subdivision. This includes the proposed wastewater retention facility, wastewater bulk main upgrades, proposed new water supply main in SH59, and the proposed telecommunication and electricity networks. The assessment often relies on the non-compliance of the proposed bulk earthworks with the earthworks standards as the trigger to seek consent, with little or no further assessment of the other relevant standards provided.

Additionally, a number of rules have been included in the assessment across other chapters and non-compliances identified (and therefore consent sought) where no information or plans have been provided for those non-compliances (such as TR-R2 and TR-R3). In other cases, rules have been identified as being complied with, when no activities are proposed that relate to the rule (such as THWT-R1).

I consider that, in order to fully understand the scope of the activities proposed and the consents sought, and to enable a full understanding of the effects of the proposal, further information and assessment is required in relation to the rules and standards of the PDP.

6 Assessment of the effects of the proposal

The sections below provide comments on the effects of the proposed development in relation to the following areas:

- Positive effects
- Cultural
- Urban Design
- Subdivision design
- Infrastructure and servicing
- Parks and reserves
- Landscape, natural character and visual amenity
- Terrestrial ecology
- Natural hazards
- Transport
- Geotechnical
- Contaminated land
- Historic heritage and archaeology
- Construction management and earthworks effects
- Reverse sensitivity
- Economic

6.1 Positive effects

The proposed development has the potential to have positive economic and social effects for Porirua and the wider region by providing additional land ready for the development of housing. These positive effects will be generated through construction activity on the site (with associated expenditure and employment in the local economy), additional household expenditure within the local economy in the long term, and the provision of additional housing in Porirua leading to downward pressure on housing costs.

Positive effects will also be generated through the retirement of relatively large areas of farmland that will be vested for public reserve. Some positive ecological effects may also be generated through the legal protection of wetlands and significant natural areas on the site.

6.2 Cultural

The site is within the rohe of Ngāti Toa Rangatira (Ngāti Toa). Te Rūnanga o Toa Rangatira (Te Rūnanga) is the mandated iwi authority for Ngāti Toa. As expressed in the strategic priorities for the Council, Porirua city seeks to partner with Ngāti Toa Rangatira in all that it does. Porirua City and Te Rūnanga have signed a strategic partnership agreement which outlines the shared commitment to partnership with each other and to the future wellbeing of Porirua. The agreement provides the opportunity for Te Rūnanga to contribute to Council decisions and to provide leadership with Porirua City for Porirua.

The expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. It is considered that only mana whenua are able to comment on the potential cultural impacts. I note that the application states that effects on values of significance to Ngāti Toa as Mana Whenua may be 'more than minor'. I consider that the determination as to whether the effects are 'more than minor', or potentially are more significant, is only able to be determined by mana whenua.

I, along with other Porirua City staff and representatives of Te Rūnanga have had ongoing discussions on the Mt Welcome application since lodgement. Porirua City staff have endeavoured to share any relevant technical reviews undertaken by or for the council with Te Rūnanga. These discussions have been invaluable and have informed my wider consideration of the application

Written comments on the application have also been sought from Te Rūnanga by the Panel in accordance with relevant sections of the FTAA. A draft version of the written comments from Te Rūnanga was provided to Porirua City staff for information. I understand that the concerns of Te Rūnanga broadly relate to:

- Stormwater management;

- Proposed roundabout and piping of Taupō Stream;
- Offsetting proposal, including the approach and combining stormwater management and ecological offsetting; and
- Protection of archaeological sites and recognition of the cultural landscape.

Having reviewed the draft comments provided by Te Rūnanga, I consider that the position expressed in those draft written comments on the proposal are closely aligned with my comments in the sections below.

6.3 Urban Design

No urban design assessment has been provided with the Applicant. In my view, this is highly unusual for a development of this scale. I undertook a stocktake of applications on the Fast-track website tagged as 'Housing/Land' for which substantive applications have been submitted, and identified whether an urban design assessment was provided.⁷ Of the 17 projects for which application documents were available, 16 included an urban design assessment.

Porirua City engaged MacIndoe Urban to undertake an urban design review of the application (urban design review). The sections below summarise the urban design review and its recommendations.

As a vacant allotment subdivision proposal, the urban design aspects of the proposed development are strongly interconnected with the proposed subdivision scheme plan. The subdivision design is addressed in more detail in section 6.4 below.

6.3.1 Basis of Urban Design Review

As no urban design assessment has been provided by the Applicant with the application, the review undertaken by MacIndoe Urban focused on the other relevant documents provided with the application, including:

- Appendix 05 - Assessment of RMA planning document objectives and policies;
- Appendix 08 - Structure Plan Assessment
- Appendix 22 - Masterplan and Landscape Urban Design Strategy (MLUDS)

In relation to the MLUDS, the urban design review notes that it does not include assessment against the relevant planning framework. While it provides a description of the masterplan and limited framework for future implementation, there does not appear to be any cross reference to those elements in the proposed consent conditions. It is therefore unclear what the status and use of the MLUDS is in relation to the consents sought.

The urban design review provided also notes that:

Given the size and complexity of the Proposal, a neighbourhood-level design review should also be provided. This would be based on NPS-UD Objective 1, Policy 1 as well as general Urban Design best practice and cross reference to any relevant DP provisions that operate at the neighbourhood level. Activity distribution, spatial structure, movement including PT [public transport] and active mode connections within and beyond the site, character, and public realm should all be addressed.

6.3.2 Positive aspects

Based on the advice from McIndoe Urban, I consider that there are positive urban design aspects of the proposed development, including the following (as set out by McIndoe Urban):

- General (but not complete) compliance with the Northern Growth Area Structure Plan;*
- General distribution and nature of parks and reserves, particularly provision of large flat areas, and for kickabout and play;*
- The proposed trail system;*
- A generally permeable block system with a suitably interconnected street system; and*
- Some connections to adjoining future growth areas.*

⁷ This was undertaken on 5 June 2026 using the Fast-Track website project search tool and included 'approved', 'in progress' and 'suspended' applications.

The urban design review also notes that there are positive outcomes from an urban design perspective in relation to provision for off-road recreational cycling and landform integration.

6.3.3 Review discussion

6.3.3.1 Structure Plan Alignment

The urban design review identifies areas of misalignment of the proposed development with the DEV-NG-Figure 1 Northern Growth Development Area Structure Plan. From a planning perspective, these areas of misalignment are inconsistencies with the Structure Plan in relation to objective DEV-NG-02 of the PDP.

The two connections to the Muri Road block are discussed as being important, but it is noted that their realisation is dependent on others. This leads to recommendations in the urban design review on improvements needed for the provisions of pedestrian and cycling access across SH59 to ensure there is pedestrian and cycling access in the event that the Muri Block is not developed.

The connections to the southern boundary are discussed with reference to the requirements of the Structure Plan and the urban design review notes that while the development does not need to realise these connections, it should not preclude them from occurring in the future irrespective of perceived technical viability. It goes on to state that:

Providing good levels of connectivity is crucial to the success of the future development of the area. The Skaiffie [sic] Block to the south is explicitly identified as future development through the structure plan connection points. Strong connectivity between development areas is a fundamental urban design principle enabling people to move efficiently and safely between homes, services, employment, and recreational destinations. Well-connected urban environments enable choice, foster social interaction, and create more resilient and liveable communities. Perceptually, multiple points of access enable development areas to integrate into a wider network rather than appearing as separate siloed subdivisions.

Connections to the southern boundary from roads 26, 11 and 10 are discussed, and the urban design review recommends that the design and provision of open space and allotment arrangements be designed so that a future connection can be achieved without removing open space or requiring expropriation, such as road reserve vested to council for construction at a later date.

Road 02 is discussed because it is the only potential future connection to the south that has been provided and it lacks dedicated cycle provision which reduces active mode connectivity.

Provision for a secondary east-west connection within the site as identified on the Structure Plan is also discussed, with a recommendation that the open space and allotments at the cul-de-sac heads of roads 21 and 25 be designed so that a future road connection can be achieved without removing or reducing open space.

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

6.3.3.2 Medium density housing

The urban design review notes the limitation on future development of the proposed residential allotments through the proposed consent notice. It notes that while the PDP anticipates medium density housing in the NGDA, this is not described in the MLUDS and is precluded by the proposed consent notice. The urban design review questions whether this gives effect to the zoning and NGDA chapter policies. The urban design review recommends that infrastructure is future-proofed to provide capacity for future medium density residential development within the development site, and that this could be assumed to occur within a reasonable walkable catchment of the local centre. This will likely have implications on the delivery of infrastructure with sufficient capacity to service the allotments within the walkable catchment, including potentially requiring earlier delivery of wastewater storage facility and the water supply reservoir.

6.3.3.3 Centre design

The urban design review identifies that the status of the neighbourhood centre design is unclear as the design presented in the MLUDS is noted as indicative only. While noting some merits, the review states that there are a number of flaws in the site planning. The location of the centre in relation to the open space, where the reserve is disconnected from the street network, is identified as potentially leading to negative outcomes. Additional control over the final layout is considered to be appropriate, given its context. The review recommends that the design be substituted with a high-level diagram such as a precinct plan.

6.3.3.4 Open space and parks

The review notes that the two 'Lucas Block' parks are located on the edges of the proposed development areas, and that relocation would create a more legible open space network with greater accessibility for the surrounding community.

The review also notes that the MLUDS shows a range of play structures but notes that these are indicative. Clarification is needed on the type and number of amenities to be provided.

6.3.3.5 Active transport

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

The integration of cycle lanes at the internal roundabouts and intersections is discussed, particularly the plans showing cycle lanes leaving the carriageway and moving onto the footpath utilising the same crossing point as the footpath before re-entering the carriageway. The review notes that, while this approach is used elsewhere, it results in cyclists often remaining in the carriageway, increasing uncertainty for drivers and pedestrians.

6.3.3.6 Road network

Road 02 is discussed in relation to the lack of provision of dedicated cycle facilities, with the review recommending that, in order to deliver the intent of the Structure Plan, this road should be amended to be in line with collector roads types A-C (as shown in Appendix 30-22 - 1753-02-3300-R1-Roading-Cross-Sections).

Connections of currently disconnected cul-de-sacs is discussed, with recommendations that Roads 12 and 15, and Roads 04 and 01, should be extended to provide greater connectivity. Additionally, connections between Roads 02 and 03, and 26 and 28, should be considered due to their large block sizes, with mid-block pedestrian pathways potentially being appropriate.

6.3.3.7 Trail network

The trail network in the MLUDS is stated as being generally positive. However, a mechanism to achieve the future connections through Lot 5003 is questioned. A potential walkway/trail connection to the Muri Block is also discussed. The delivery of the trails with the final contour and earthwork design is also questioned, as it appears these designs have not accounted for the formation of the pathways.

6.3.3.8 Management and implementation

The urban design review identifies that the MLUDS refers in multiple places to guidelines and controls that do not appear to have been submitted as part of the application. It is not clear if these are proposed in addition to the existing Urban Design Guides in the PDP (appendices 3 to 7 of the PDP). As these have not been provided with the application, no comments were able to be included in the urban design review on these design guides.

Additionally, it is identified that there is clarity required in relation to the 'landscape treatments and built form controls' stated in the MLUDS, and whether the proposed consent notice in condition 110 is the full extent of those controls. The urban design review states that the consent notice does not provide an adequate level of control to achieve the desired outcome and recommends that further detail is provided on the outcomes sought by the consent notice.

The urban design review states that, to achieve some of the positive qualities described by the MLUDS, including low fences at boundaries with streets and public reserves, these guidelines and controls should

be established. If these are produced, a mechanism for implementation will be required. The proposed conditions provided by the Applicant do not currently make any mention of additional design guidelines or controls.

6.3.3.9 Improvements needed

Improvements to the urban design outcomes of the proposed development are set out in the appendix to the urban design review memorandum. These are summarised in Figure 5 below.

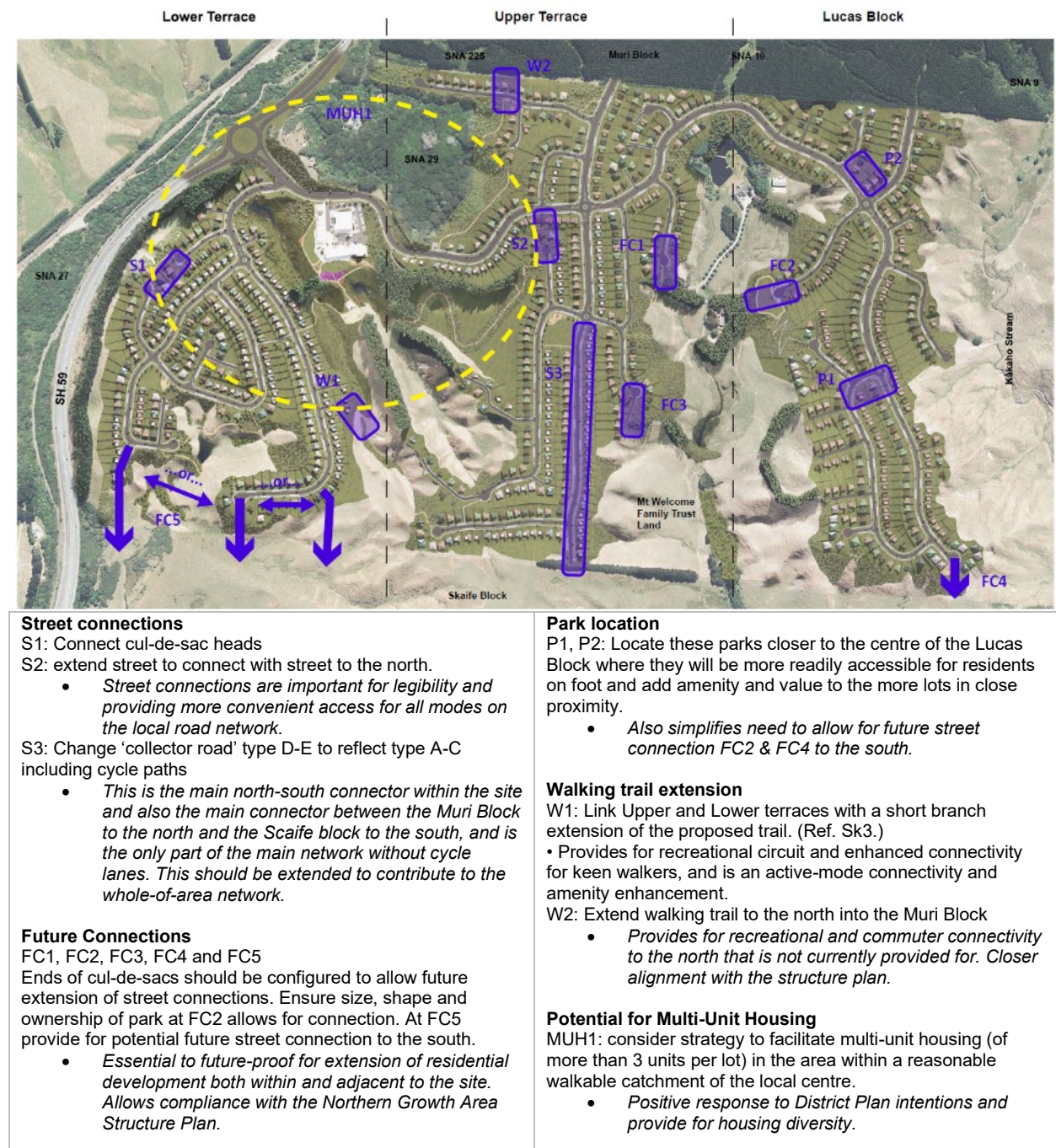


Figure 5: Summary of urban design review recommendations for improvements

6.3.4 Recommendations

Paragraphs 56 to 70 of the urban design review sets out recommendations for the proposed Mt Welcome development. These recommendations are set out in Table 1 below with proposed planning responses to implement the recommendations.

Table 1: Proposed responses to Urban Design Review recommendations

Recommendation		Proposed Planning Response
1	The open space and lot layouts at the heads of Roads 10, 11 and 26 be designed to enable future road connections into the Skaiffe Block without requiring the removal of open space or land acquisition, potentially through provision of future road reserve land.	Revision of scheme plan to include road reserve of sufficient width to enable future road connections from Roads 10, 11 and 26 to the southern boundary.
2	The lot and open space arrangements at the heads of Roads 21 and 25 be designed to preserve the ability to deliver future road connections without reducing open space reserves or requiring land acquisition.	Revision of scheme plan to enable future road connection between Roads 21 and Road 25 of appropriate width and gradient.
3	The eastern-most track route be shown on the application plans and secured through a consent condition requiring delivery when the wider Muri Block loop track network is developed.	Revision of MLUDS plans. Additional consent condition requiring a consent notice on Lot 5003 for delivery of eastern track through any future development.
4	An additional off-road walking and cycling connection be provided from Upper Terrace to connect with the existing track south of Road 7 and improve active mode links to the Muri Block.	Revision of scheme plan and roading plans
5	The subdivision layout be refined in accordance with the recommendations in Appendix 1, including improved street connectivity, collector road extensions, park relocation, walking trail links, future-proofing measures, and support for multi-unit housing near the local centre.	This overarching recommendation is achieved through the other proposed responses.
6	Services infrastructure be designed with sufficient capacity to support future medium-density residential development within a reasonable walkable catchment of the local centre.	Additional consent conditions for assumptions of the number of dwellings to be provided for by water, wastewater and stormwater infrastructure networks.
7	The indicative centre design be replaced with a higher-level precinct plan approach to provide stronger direction and control over key structural elements.	Proposed precinct plan to be provided by Applicant. Additionally consent condition to be included requiring a consent notice on Lot 1000 requiring future development to be in accordance with the precinct plan.
8	The two Lucas Block parks be relocated to more central and accessible locations to improve usability, visibility, and future road network flexibility.	Revision of scheme plan by Applicant to relocate the two proposed parks within the 'Lucas Block'.
9	A safe crossing facility be provided to connect with the Ara Harakeke shared path, preferably through a signalised intersection.	Revision of roading plans by Applicant to include active transport connection across SH59.
10	The proposed road type for Road 02 be amended to align with Collector Road Types A–C (with provision of cycle lanes) to better reflect the intent of the Northern Growth Development Area Structure Plan.	Revision of roading plans by Applicant to show all of Road 02 as Collector Road Types A–C.
11	Roads 12 and 15 be extended to form a connected crescent loop, and Road 04 be connected to Road 01 to improve network connectivity.	Revision of scheme plan and roading plans by Applicant to provide roading connections.
12	Additional pedestrian or road connections be considered between Roads 02 and 03, and Roads 26 and 28, to improve permeability across large blocks.	Revision of scheme plan to create pedestrian and/or road connections.
13	All referenced design guidelines and controls be provided, and their planning status clearly defined to enable proper assessment. Additionally, a formal implementation mechanism be established to ensure any future design guidelines and controls are applied and enforceable through the consent framework.	Further information to be provided by Applicant's landscape architect on guidelines referenced in the Strategy. Additional consent condition for implementation of design guidelines.
14	Confirmation be provided that consent notices #110 & 111 represents the full extent of the proposed landscape treatments and built form controls referenced in Appendix 22 - Masterplan + Landscape Urban Design Strategy.	Further information to be provided by Applicant's landscape architect.
15	Further detail be provided on the landscaping measures identified in Consent Notice #110 to ensure the intended outcomes are achieved.	Amendments to condition 110 consent notice wording.

6.4 Subdivision design

The proposed subdivision design will lead to a number of issues in the future. These includes issues relating to subdivision staging, limits on residential development, precluding future transport connections, three waters infrastructure provision, consent notice areas, stream offset areas, and access allotments. These issues are discussed in the sections below.

6.4.1 Subdivision staging

The application seeks flexibility in the staging of the development, with proposed condition 69 sought to enable staging to occur in any order provided that certain criteria are met. While I agree that some flexibility in development staging is appropriate, I consider that there are a number of issues with the level of flexibility for staging sought by the Applicant. This is because progressing with some stages ahead of others may result in unanticipated and unmanaged adverse effects on the environment.

6.4.1.1 Superlots

The proposed subdivision includes an initial subdivision stage to create four 'superlots' (Lots 5000 - 5003). These are shown on the scheme plans '1753-02-1004-R2-Scheme-SuperLots' contained in Appendix 30-03 of the application. The scheme plan for the superlots is reproduced in Figure 6 below.

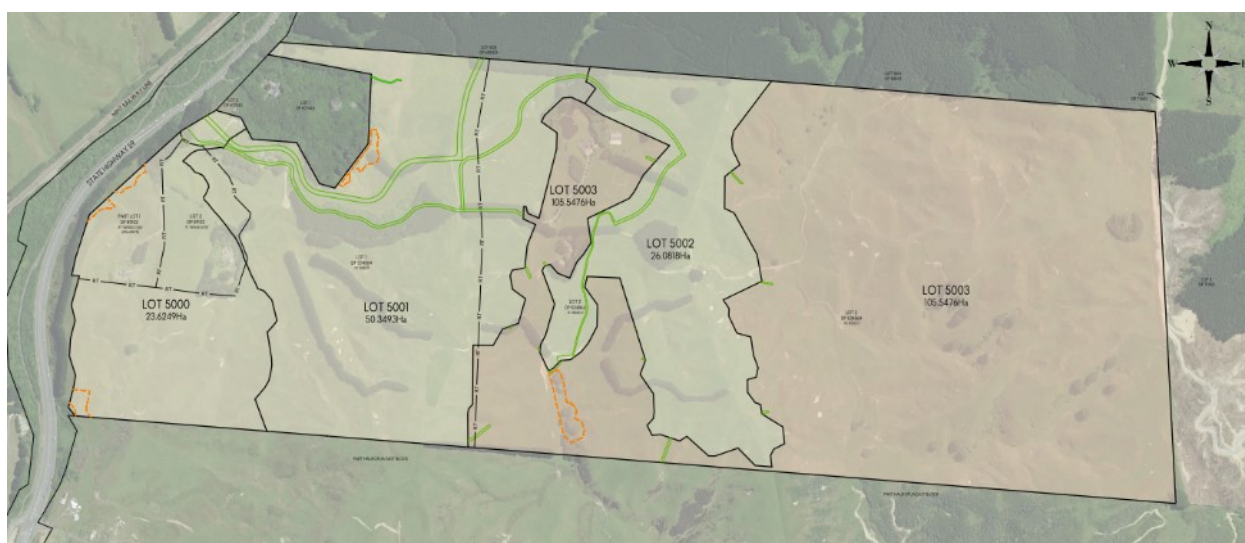


Figure 6: Subdivision superlots

Source: Appendix 30-03 - 1753-02-1004-R2-Scheme-SuperLots

As an overarching comment, it is not entirely clear what the purpose of the proposed superlots subdivision stage is. The application states that the superlots are proposed for 'facilitating staging of the development' and that:

These super lots will subsequently be further subdivided into the individual residential lots as each stage progresses. This approach enables more efficient delivery of infrastructure, supports commercial flexibility, and allows for continued interim agricultural use of undeveloped areas.⁸

However, the earthworks staging plans do not align with the proposed superlots. Additionally, based on the detailed drainage plans⁹, the stormwater infrastructure for Stage 1, which is within superlot 5000, relies on the 'retention wetland' which would be located in the adjoining area of Lot 5001, with the retention wetland identified as being within Stage 5A.

In my view, a further full assessment of the proposed superlots is required to ensure that the initial subdivision proposed as part of the development does not result in unintended consequences that may result from superlots being created that are not subsequently developed in the future in accordance with the proposal. This will likely require additional consent conditions specific to the superlots.

⁸ Fast Track Substantive Application Pukerua Property Group Limited Partnership Mt Welcome, Pukerua Bay, Porirua 16 March 2026, page 50.

⁹ Appendix 30-24(A) – 1753-02-4100-R1-Drainage-Detailed, drawing 4101.

As currently proposed, the superlot subdivision could lead to the following issues:

- **Lots 5000 and 5001:** While these contain existing dwellings, no information is provided on the buildings or infrastructure located within the proposed allotments. This includes the number and location of existing residential dwellings within the proposed allotments and areas for stormwater and wastewater disposal.
- **Lot 5002:** This allotment would not contain any existing dwellings or other buildings. No appropriate building platform location is identified on the allotment. No information is provided on how stormwater and wastewater would be disposed or electricity or telecommunication connections provided. This lot is within the later stages of the proposed development, and therefore it is a possibility that, if the developer chose not to progress with the full development, the lot could be sold in the future.
- **Lot 5003:** This allotment is proposed to be retained by the current owner and continue to be farmed. Lot 5003 includes a connection strip of land along the southern boundary that connects the two larger areas of the proposed allotment. This connecting strip is in the location of the eastern Transport Connection identified on the Structure Plan, effectively precluding any future roading connection to the southern boundary without a future subdivision process. This is discussed in more detail below.
- **Road access:** State Highway 59 is a Limited Access Road. No information is provided on how the access within the proposed superlot subdivision, particularly bearing in mind the effect of section 93 of the Government Rooding Powers Act 1989.

6.4.1.2 Order of development staging

As noted above, proposed condition 69 is sought by the applicant to enable staging to occur in any order provided that certain criteria are met. However, while some flexibility is appropriate, the staging needs to occur in a manner so that the potential significant adverse effects of out-of-order staging are avoided. These adverse effects may be caused by the staging creating residential allotments without also creating the associated infrastructure, open space, or transport connections (including active and public transport) needed to support those allotments.

There is an additional potential issue with this approach, as some conditions proposed by the Applicant were tied to certain stages by referencing stage numbers. For example, the wastewater bulk main upgrades were proposed to be tied to Stage 8. While this has been addressed in the latest proposed condition set, it is noted that any conditions that need to be complied with at certain points need to reference a different metric, such as number of lots created, or the conditions must not enable out-of-order staging.

Given that there may be unintended consequences of stages being developed out of order, in my view the preferable outcome would be for the development to occur in a pre-set sequenced order, which should be set out in conditions. This would ensure that any adverse effects of the development sequencing would be able to be understood and appropriately managed. If a different order were to be proposed, this could be addressed through amendments to the conditions under section 127 so that the effects could be properly understood and assessed.

The alternative is that ad hoc development may occur, without any guarantee that the whole development would be completed, and the supporting infrastructure or amenities may not be delivered concurrently. This would be a poor outcome and should be avoided through appropriate consent conditions.

6.4.1.3 Delivery of stormwater infrastructure for relevant stages

This issue is directly connected to the issue addressed above relating to the sequencing of development staging. This matter is also addressed in the draft comments from Tiaki Wai that I have viewed.

The 'retention wetlands' that are proposed to be delivered as part of the stormwater management system infrastructure for the development are in some cases identified in separate stages from the residential allotments which they are intended to serve. As noted above, this is the case for Retention Wetland B which is identified as being in Stage 5A, but the catchment which it serves includes residential allotments within Stage 1. Similarly, Retention Wetland D is identified in Stage 10, but its catchment includes part of Stage 5B. Retention Wetlands C and E are identified as the last stages of the development, being stages

20 and 21, whereas they are intended to service much earlier stages. There may also be other infrastructure that is similarly affected by staging inconsistencies.

While it may be the case that the earthworks staging enables the infrastructure to be constructed prior to the subsequent subdivision staging, that infrastructure must be operational and vested with the relevant party to enable the residential allotments to be subdivided and progress through section 224 processes. This would not be achievable with the current staging inconsistencies.

In my view, review and revision of the subdivision, earthworks and infrastructure plans and staging may need to be undertaken to ensure that all infrastructure required to service each stage is included within that stage or previous stages.

6.4.2 Limits on residential development

The proposed conditions include a requirement for consent notices to be placed on the residential allotments that restrict development to one dwelling per allotment. This is contrary to the Medium Density Residential Standards (MDRS) incorporated into the district plan through the IPI in accordance with the RMA-EHS. The MDRS, and subsequently the residential zones in the PDP, enable three residential units per site. The proposed consent notice therefore effectively ‘down-zones’ the area by overriding the MDRS density standards incorporated into the PDP.

6.4.3 Future transport connections precluded

6.4.3.1 Transport connections to the southern boundary

The NGDA Structure Plan (see Figure 4) identifies three ‘Transport connections’ along the southern boundary. The application has provided for one roading connection to the southern boundary, in the general vicinity of the middle connection point (approximately 120 metres east of the location identified on the Structure Plan). The western and eastern Transport Connection points are precluded by the subdivision design which does not allow for a future connection to be created to the proposed roads that terminate close to those Transport Connection points.

In my view, it is critical that the subdivision design allows for the transport connections along the southern boundary to be made in the future. The Council has previously identified this as a critical issue throughout pre-lodgement consultation with the Applicant. Construction of the roads to the boundary is not necessarily required, but rather that the subdivision design should not preclude this for occurring in the future.

The approximate locations of Structure Plan Transport Connections are shown in Figure 7 below in relation to the Ecological Overlay provided with the application.

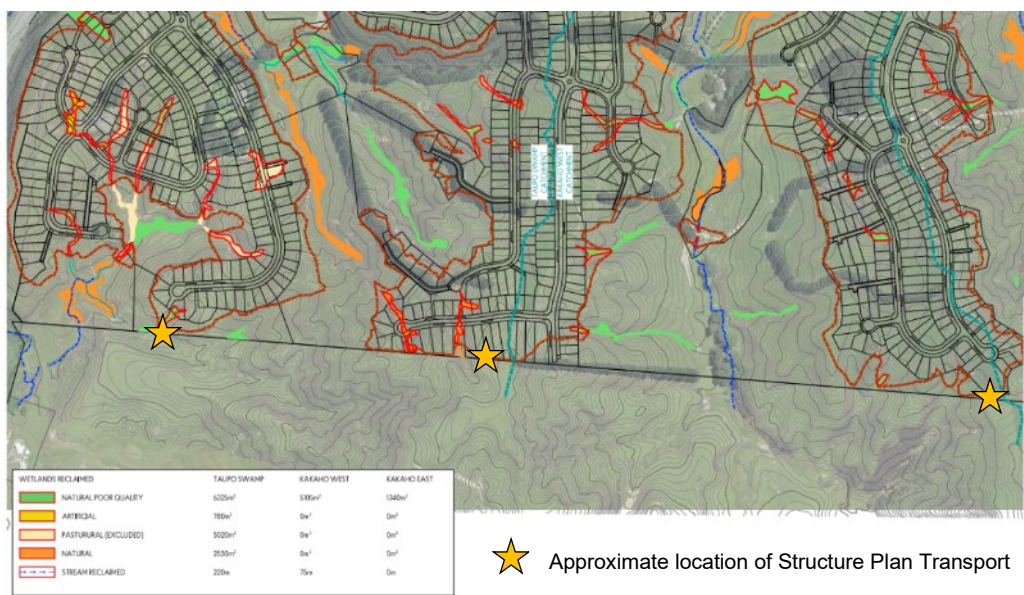


Figure 7: Ecological Overlay provided with the application and approximate locations of Structure Plan Transport Connections

Source: Appendix 30-41 - 1753-02-SK9250-R1-Ecological Overlay

6.4.3.1.1 Southern boundary eastern connection

The Structure Plan identifies a Transport Connection on the southern boundary approximately 950 metres from the eastern corner of the site. This is in close proximity to the end of Road 26, as shown on Figure 7 above. I note that the proposed earthworks extent (shown in Figure 7 as the red outline) almost extends to the boundary in this location. The proposal includes a park at the end of Road 26. Between the park and the southern boundary is a strip of land that would be part of proposed Lot 5003. There are no wetlands or streams identified on the Ecological Overlay within the site between the end of Road 26 and the boundary of the site.

As discussed in 6.3.3.4 above, the park at the end of Road 26 is proposed in the urban design review provided by McIndoe Urban to be moved further within the development, to make this more accessible to the surrounding residents. This would also have the benefit of enabling a roading connection through the identification of road to vest to the southern boundary in this location to give effect to the Structure Plan. I note that this would also require the road to vest to include the area of land within Lot 5003 in this location.

As such, I consider that an additional road connection to the southern boundary in this location is achievable and is not impeded by topographical or ecological constraints within the site. There is a clear opportunity for the transport connection to be provided for in accordance with the Structure Plan and clause 4(b) of policy DEV-NG-P2.

6.4.3.1.2 Southern boundary western connection

The Structure Plan identifies a Transport Connection on the southern boundary approximately 230 metres from the western corner of the site. This is in close proximity to the end of Road 10, as shown on Figure 7 above. The proposed earthworks extent almost extends to the boundary in this location. There is a natural wetland identified on the Ecological Overlay in this location; however, it is categorised as 'poor quality' and is already proposed to be reclaimed by the Applicant as it is within the proposed earthworks extent.

The proposed allotments between the end of Road 10 are residential and recreational reserve. There are not considered to be any issues with creating a road to vest from the end of Road 10 to the southern boundary.

As such, I consider that an additional road connection to the southern boundary in this location is easily achievable and is not impeded by topographical or ecological constraints within the site. There is a clear opportunity for the transport connection to be provided for in accordance with the Structure Plan and clause 4(b) of policy DEV-NG-P2.

6.4.3.1.3 Civil Infrastructure report Assessment

The application includes in the Civil Infrastructure Report an assessment of the Structure Plan transport connections (see section 8.10). This assessment states that, based on preliminary investigation, the "opportunities to establish practical and meaningful connections are limited due to topographical and ecological constraints". As discussed above, I am not aware of any topographical or ecological constraints within the Mt Welcome site that prevent the connections as suggested by the report. I note that the Civil Infrastructure Report also states that "Our desktop engineering assessment indicates that only the central southern alignment is technically viable, primarily due to steep topography and ecological constraints within the Skaife Block" As such, it appears that the constraints referred to in the report relate to the adjoining land to the south of the Mt Welcome site. However, no technical ecological assessment or topographical surveys of the adjoining land have been provided with the Mt Welcome application. As such, I am not aware of the basis for the statements made in the Civil Infrastructure Report regarding the supposed constraints.

I note that there are factual errors and inconsistencies in the substantive application and supporting technical documents relating to the assessment of the connections to the southern boundary. The Civil Infrastructure Report prepared by Envelope Engineering states in section 8.10.1 that:

It is also important to note that the Skaife Block remains zoned rural, with no current development plans.

The 'Skaife Block'¹⁰ is approximately 279.2 hectares in area and is located south of the Mt Welcome site. Contrary to the statement above, the property is in fact zoned Future Urban Zone (FUZ), Rural Lifestyle Zone and General Rural Zone, as shown in Figure 3 above. The area of the property zoned FUZ is approximately 62.3 hectares, or approximately 22.3 percent of the total property, with approximately 54.8 hectares of the FUZ land located adjoining State Highway 59. This same error is repeated in the 'Structure Plan Assessment' contained in Appendix 8 of the application.

I also note that the same report states that on the application site the maximum cut height is approximately 21 metres and maximum fill depth is approximately 24 metres. These cut and fill heights are likely to be significantly greater than those required for earthworks to enable the eastern and western transport connections to the southern boundary. Based on the existing contours available on Council's GIS maps, the surrounding land in the location of the Transport Connections ranges in elevation by approximately 10 to 15 metres.

6.4.3.2 Road connection through Lot 5003

The Structure Plan identifies two east-west road connections that would connect the Upper Terrace and Lucas Block. The Applicant only provides for one of these connections in the northern part of the site, with the area of the southern east-west road connection located within proposed Lot 5003 to remain undeveloped.

The Applicant addresses this east-west road connection in Appendix 8 Structure Plan Assessment. The assessment states that:

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

However, the development is designed in such a way in that it does not preclude a future roading link in this location. This could feasibly be provided in the location marked with a red arrow in Figure 7 below.

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



Figure 8: Applicant's proposed potential future east-west roading connection

Source: Figure 7 of Appendix 8 Structure Plan Assessment

I consider that the Applicant's assessment does not account for the significant constraints created by the proposed subdivision layout on the ability to achieve the east-west roading connection shown on the

¹⁰ 310 State Highway 59 Pukerua Bay, legally described as Part Haukopua East Block held in Record of Title WN42B/29

Structure Plan in the future. These constraints are created in relation to both the western and the eastern connections of the future road at the termination points of both Road 21 and Road 25.

- Eastern connection point:** As shown in Figure 9 below, the area of the eastern connection point of the future east-west road to Road 25 is proposed to be vested with Council partially as a recreation reserve (being lot 1212) and partially as road reserve (being Lot 3100). The area of the recreation reserve adjoins approximately the southern half of the turning head of the cul-de-sac, while the road reserve covers the northern half. No justification is provided for the location of the split between the two classifications, or a potentially feasible roading alignment provided. Without this information, it is not known whether the location of the road reserve is appropriate. As such, in order to enable a roading connection through lot 1212 in the future, the classification of allotment 1212 may need to be changed. The change of a classification of a reserve is controlled under section 24 of the Reserves Act 1977. I consider that this places a significant and unnecessary administrative burden on Council, and any applicant for subdivision of lot 5003, to achieve a roading connection through lot 1212 to Road 25 in the future.

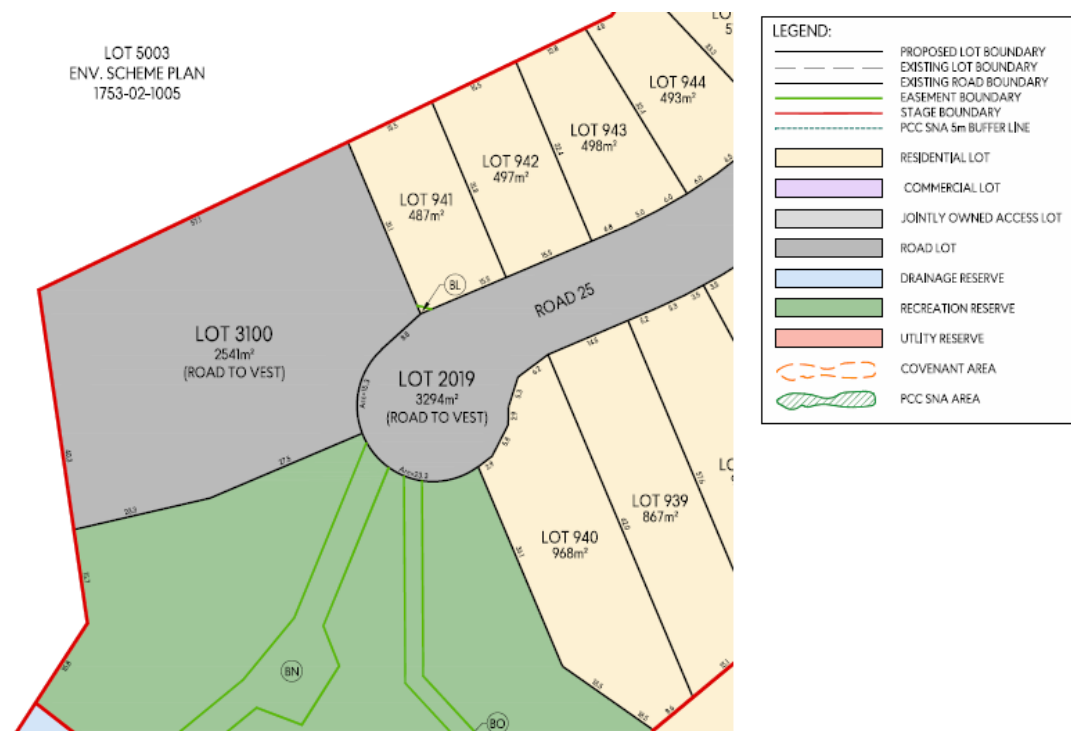


Figure 9: Area of eastern connection of future east-west road
 Source: 1753-02-5001-R2-2026-07-02, Drawing 1029

Additionally, I note that the loss of the area of recreational reserve from this location has not been provided for through relocation to another area. As noted above in section 6.3.3.9, in my view, the proposed park at this location should be relocated as recommended in the urban design review.

- Western connection point:** As shown in Figure 10 below, the area of the western connection point of the future east-west road to Road 21 is proposed to be only five metres wide. If the adjoining land proposed to be vested as recreation reserve were to be included (which, as addressed above, I consider is not practicable), the width remains narrow at less than nine metres. The Porirua District Plan 2025 requires a legal width of at least 15.2 metres for Access roads servicing up to 2,000 AADT.¹¹

¹¹ A width of 13.4 metres is required for Access roads that service less than 200 AADT movements. It is assumed that the future connection road would service a significantly greater number of movements.

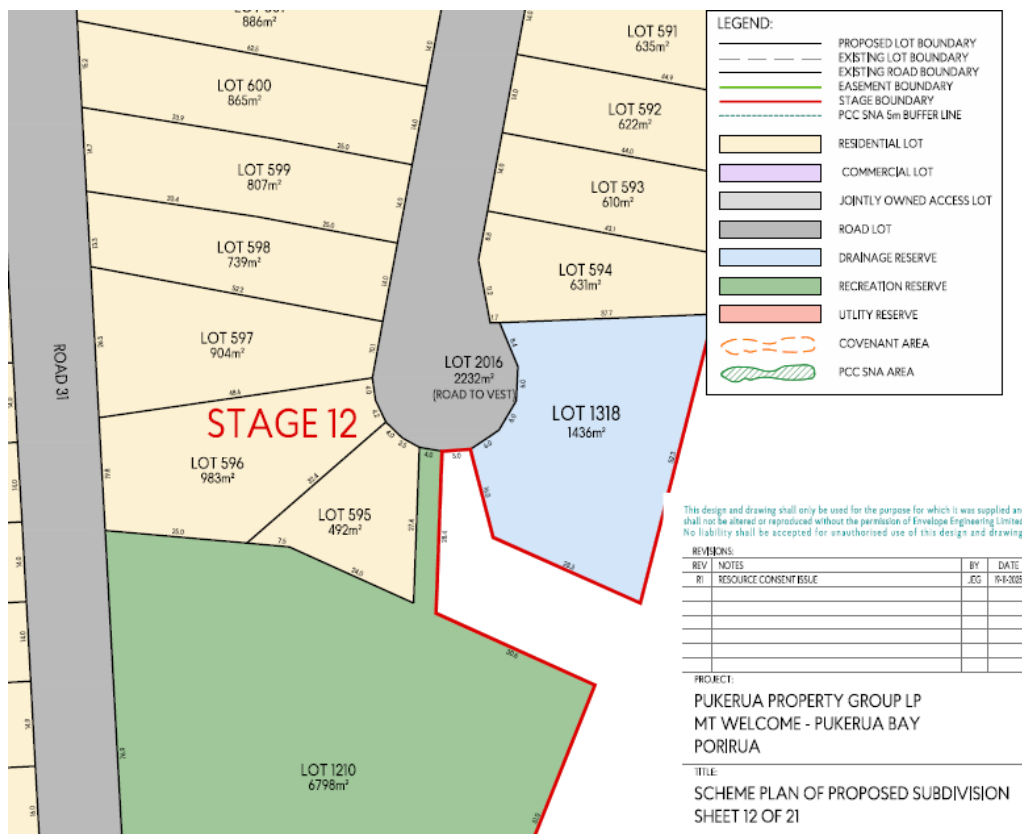


Figure 10: Area of western connection of future east-west road
Source: 1753-02-5001-R2-2026-07-02, Drawing 1025

Because of these constraints, and contrary to the assessment provided by the Applicant, I consider that with the existing proposed subdivision design, it is not possible to achieve a future road connection through Lot 5003 to give effect to the Structure Plan. This triggers clause 1 of policy DEV-NG-P4 of the Porirua District Plan 2025, which, under a normal RMA consenting process, would mean that the proposed development would be required to be avoided.

6.4.4 Three waters infrastructure

I have identified issues with the subdivision design in relation to the three waters infrastructure proposed to service the development. These issues relate to the lack of recognition of Tiaki Wai as the new water entity, requirements for separate allotments, easements for overland flow paths and service connections for reserves.

6.4.4.1 Retention wetland embankments

The retention wetland embankments are proposed to be constructed partially within land proposed to be vested to Porirua City. These embankments are part of the proposed stormwater management system on the site. Porirua City no longer owns or manages stormwater assets. As such I consider that it is unlikely that Porirua City would accept these assets being located within land to be vested to the council.

To clarify this further, I consider that it would be appropriate to include an advice note on proposed consent condition 31 stating that Porirua City is under no obligation to accept any allotments or assets approved under any resource consent or to approve any connection(s) to Porirua City infrastructure.

6.4.4.2 Tiaki Wai is a separate entity

The Civil Infrastructure Report states in section 9.6 that all public stormwater infrastructure will be vested in Porirua City Council. This is not correct. Tiaki Wai started operating on 1 July 2026, taking over responsibility for water assets and funding and the delivery of water services from councils and Wellington Water. Porirua City Council has transferred its water assets to Tiaki Wai and will no longer hold water assets. This is not recognised in the application and will have implications in terms of reserve classification, requirements for separate allotments, and access requirements.

6.4.4.2.1 Reserve classification

The subdivision scheme plan identifies allotments for stormwater infrastructure as drainage reserve. This reflects the assertions in section 9.6 Infrastructure Report that the public stormwater infrastructure will be vested to Porirua City Council and managed by Wellington Water. However, this infrastructure will need to be vested to Tiaki Wai. I understand that the allotments that contain three waters infrastructure will need to be freehold fee simple titles.

6.4.4.3 Separate allotments

There is three waters infrastructure within allotments identified to be vested as road reserve. An example is the raingarden located at the end of Road 02, as shown in Figure 11 below.

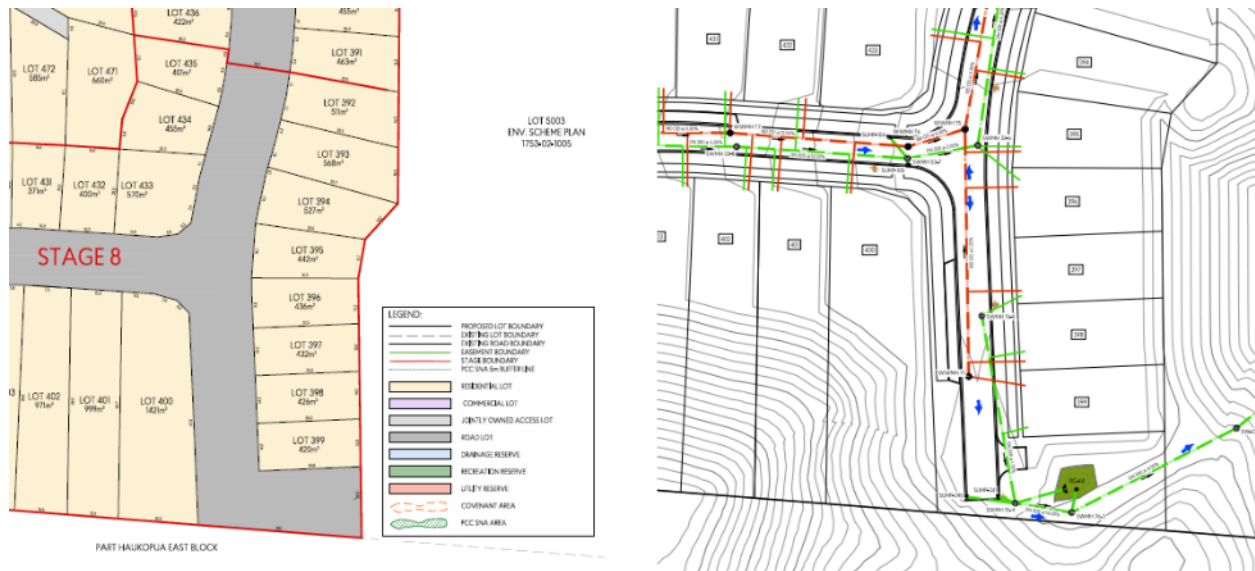


Figure 11: Example of raingarden located within road reserve

Source: Appendix E – Updated scheme plans 1753-02-1010, and Appendix 30-24(A) – 1753-02-4100-R1-Drainage-Detailed

Any three waters assets located within road reserve (other than the undergrounded reticulated pipe network) or recreation reserves that are to be vested to Tiaki Wai will require separate allotments to be provided to contain those assets.

6.4.4.3.1 Access

Any access routes to proposed three waters infrastructure that traverse recreational reserve and which are not already covered by a drainage easement will require a right of way easement to be identified to provide access for Tiaki Wai.

6.4.4.4 Easements for overland flow paths

The proposed stormwater network includes discharge points within private land (Lot 5003) that will create overland flow. I consider that any overland flow paths that will be created by the proposed stormwater infrastructure over private land should have easements identified over them to protect those flow paths from earthworks, buildings or structures.

6.4.4.5 Service connections to reserves

The resource consent assessment at Appendix 4 of the application states that lots that will be vested as reserves do not comply with standards SUB-S4 (water supply), SUB-S5 (wastewater disposal) and SUB-S6 (stormwater management). A review of the Appendix 30-24(A) being plans '1753-02-4100-R1-Drainage-Detailed' confirms that stormwater and wastewater connections are not proposed to be provided to the proposed parks or reserve allotments.

In my view, all reserve allotments should be provided with infrastructure connections. The MLUDS notes that the key features of the neighbourhood reserve may include public toilets. This cannot occur without water and wastewater connections. Additionally, I note that the draft CODS require at section 8.11.1 that a water connection sized for a water fountain is to be supplied to each park.

6.4.5 Proposed allotments

Policy SUB-P1 seeks that, among other matters, subdivision results in allotments that:

- 1. Reflect the intended pattern of development and are consistent with the purpose, character and amenity values of the zone; and*
- 2. Are of a size and dimension that are sufficient to accommodate the intended development form for that zone;*

The sections below address the lot size and layout and building platforms.

6.4.5.1 Residential lot sizes and layout

The minimum allotment size is set out in the Subdivision chapter standard SUB-S1. The minimum allotment size for the MRZ is 300 square metres. The application states that the proposed 949 residential allotments are sized between 316 square metres to 2386 square metres, with an average lot size of close to 523 square metres. As such the proposed residential allotment size is appropriate.

While noting the recommendations of the urban design review set out in 6.3.4 above, I consider that the general layout of the proposed residential allotments appears to be appropriate. The scheme plan provided with the application does not identify building platforms on the proposed allotments. However, it appears that each allotment is likely to be able to contain the nine-by-fourteen metre rectangle in accordance with standards SUB-S1 of the PDP.

6.4.5.2 Allotments for infrastructure

Proposed Lot 1300 relates to the wastewater storage facility. As discussed in section 6.14.6 below, the allotment is potentially not large enough to provide for the required wastewater storage volume. Similarly, proposed Lot 1400 is not sufficiently sized to house the proposed bulk watermain pumpstation as this is shown on the plans as being located directly adjoining the side and rear boundary whereas the Infrastructure chapter standards require a two metre setback from these boundaries.

Additionally, based on the draft comments provided by Tiaki Wai that I have reviewed, the proposed raingardens are considered to be undersized and that access for maintenance has not been adequately provided. As such, the allotments for these are also considered to not be sufficiently sized for the proposed infrastructure.

6.4.5.3 Amalgamation condition errors

There is an error in the amalgamation conditions for the proposed Joint Ownership Access Lots (JOALs), as condition 14 which relates to Lot 1113 refers to two shares, whereas the proposed JOAL (JOAL O) provides access to three allotments.

6.4.6 Consent notice areas within road reserve

The scheme plan provided with the application identifies consent notice areas within allotments proposed to be vested as road reserve. Examples of this are shown circled in red in Figure 12 below.

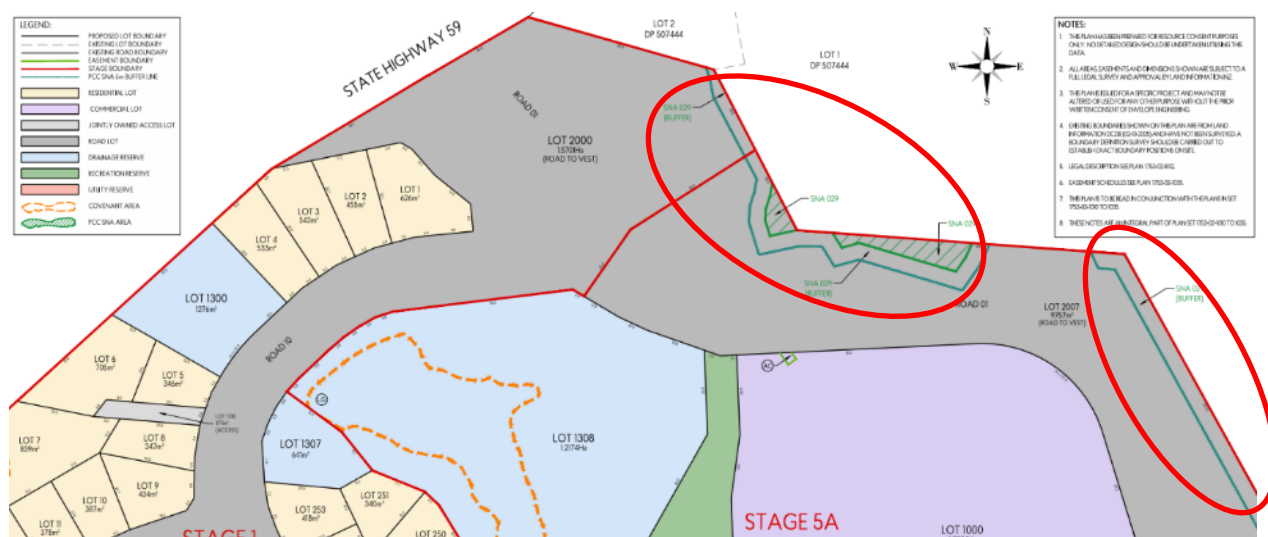


Figure 12: Consent notice areas identified on proposed road to vest
Source: Appendix E – Updated scheme plans 1753-02-1010, Drawing No. 1017.

Lands parcels vested as roads are not issued a record of title. As such, consent notices cannot be associated with these parcels.

Given its size, location and topography, I consider that the land covered by the SNA and buffer area would not have any recreational value and therefore vesting as recreational reserve would not be appropriate.

To address this matter, the land could be identified as a freehold fee simple title, which could then be vested to Porirua City.

6.4.7 Stream offset area

The stream offset area is within Lot 5003, which is proposed to be subdivided as part of the initial 'superlot' subdivision, as discussed in section 6.4.1.1 above. Lot 5003 is proposed to be retained by the current owner with the existing farming land uses to continue. An extract of the proposed subdivision scheme plan is shown in Figure 13 below. The area identified as 'LO' is proposed to be subject to a 'land covenant' as described in the subdivision schedules.

There is a disconnect between the scheme plan, which refers only to 'covenant area' on the plans or 'land covenant' in the schedule, and the proposed conditions which refer specifically to 'Conservation Covenant Areas identified on the Scheme Plan' (see proposed condition 103). This is discussed further in section 7 below.

The applicant responded to comments from Porirua City on the first substantive application relating to the need for access to the stream offset area in the Lot 5003. The response was to provide an easement area from the 'retention wetland' area, identified as Stage 20 on the proposed scheme plan, to the stream offset conservation covenant area. This easement area is identified as DH in Figure 13 below.

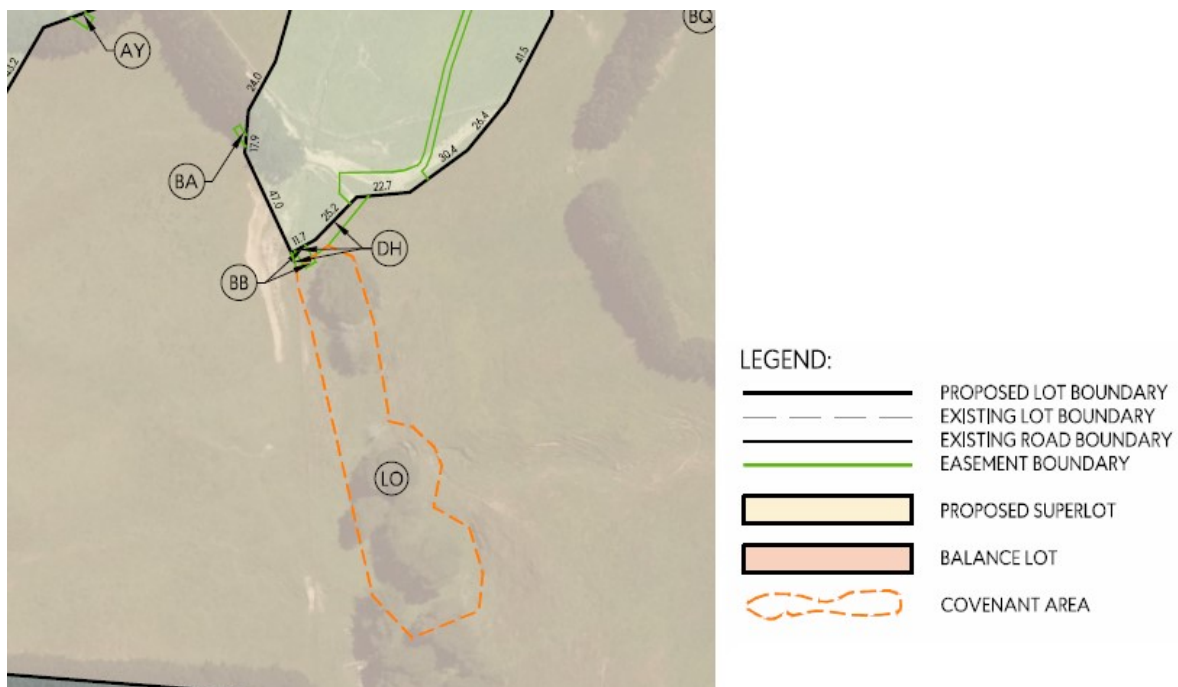


Figure 13: Stream offset area within Lot 5003

Source: 1753-02-1004-R2-Scheme-SuperLots, Drawing No. 1006

However, while access is provided by the easement to the stream offset area, the easement does not extend across the conservation covenant area. This means that there is no legal ability for council officers to access the area for monitoring purposes. As such, the easement should be extended across the entirety of the offset area.

6.4.8 Access allotments

The proposal includes allotments identified as JOALs. JOALs relate to the definition for 'access allotments' in the PDP, which is:

Access allotment means any separate allotment used primarily for access to a lot or lots having no legal frontage, but excludes any area of land that is wider than 6m and not legally encumbered to prevent the construction of buildings.

As such, in order for the proposed allotments identified as JOALs to be considered 'access allotments' under the PDP, the consent conditions need to include consent notices on the relevant allotments greater than six metres wide preventing the construction of buildings.

6.5 Infrastructure and servicing

There are significant concerns in relation to the proposed infrastructure and servicing for the development. These concerns include three water infrastructure as well as electricity and telecommunication.

6.5.1 Three waters

In relation to three waters infrastructure, Tiaki Wai assumed responsibility for delivery of water services within Porirua from 1 July 2026. Written comments have been requested from Tiaki Wai and as such those technical comments on three waters infrastructure take precedence. Draft technical comments provided by Tiaki Wai have been reviewed by me. The comments below address the planning related matters for three waters based on those draft technical comments.

6.5.1.1 General

Comments provided by Tiaki Wai have identified high level issues with the proposed three waters infrastructure and do not support granting of the consent based on the application presented.

The draft technical comments provided by Tiaki Wai support the proposed consent conditions limiting future residential development to one dwelling per allotment. I understand that this support relates to the infrastructure capacity limitations.

While the position and reasoning of Tiaki Wai on this matter is respected, as discussed in other sections of these comments, the limitations on future residential development are not in alignment with the underlying zoning and outcomes sought in the Northern Growth Development Area.

I consider, additional consent conditions are required to address the infrastructure capacity constraints to enable medium density residential development within a walkable catchment of the proposed neighbourhood centre, consistent with the recommendations of the urban design review discussed in section 6.3.3.2 above.

6.5.1.2 Water supply

I understand from the technical comments of Tiaki Wai that there are a number of issues relating to the proposed water supply including:

- It appears that the application does not incorporate water conservation measures to preserve water resources and their mauri;
- There are lots within the development that will not have compliant water pressures;
- There is a discrepancy between the Applicant's assumptions and actual capacity of the existing Pukerua Bay water reservoir; and
- The existing Bulk Water Supply Main (GWRC Bulk Main) capacity constraints have not been considered.

I note that the comments on water conservation measures relate directly to policy 45 in the RPS.

Tiaki Wai has proposed additional consent conditions to address these issues. These also include conditions relating to Engineering Approval including the design, implementation (including metered connections) and post construction testing of the network to demonstrate appropriate water servicing to each lot. I support the additional conditions proposed by Tiaki Wai.

6.5.1.3 Wastewater

I understand from the technical comments of Tiaki Wai that there are a number of fundamental consent-level issues relating to the proposed wastewater infrastructure:

- The wastewater modelling provided to support the application cannot be relied upon to demonstrate that the development does not result in increased wastewater overflows;
- The proposal does not appropriately address cumulative effects on Te Awarua-o-Porirua Harbour, Taupō Stream and Kakaho Stream; and
- The application does not include wastewater modelling or an optioneering report that justifies the design and demonstrates the opportunities and constraints to minimize the number of lots where pumped systems are required.

The draft technical comments provided by Tiaki Wai identify that the proposed approach does not demonstrate that the adverse effects associated with wastewater overflows to the sensitive receiving environments of Te Awarua-o-Porirua Harbour and Taupō Stream will be appropriately avoided, remedied or mitigated. This is of particular concern given Te Wai Ora o Pāirua — the Porirua Harbour Accord.

Tiaki Wai has proposed additional consent conditions to address these issues. These also include conditions relating to Engineering Approval including the design, implementation (including connections) and post construction testing of the network to demonstrate appropriate wastewater servicing to each lot. I support the additional conditions proposed by Tiaki Wai.

6.5.1.4 Stormwater

6.5.1.4.1 Treatment and hydrological control

I understand from the technical comments of Tiaki Wai that there are a number of fundamental consent-level issues relating to the proposed stormwater infrastructure:

- There is no clear options assessment in the application documents demonstrating how alternative stormwater management approaches were considered;

- The sizing of the proposed raingardens does not meet relevant guidelines;
- The proposed system does not include a retention component, with the 'retention wetlands' only providing extended detention;
- Cumulative effects on Te Awarua-o-Porirua Harbour, Taupō Stream and Kakaho Stream have not been assessed;
- Issues with the Schedule 29 Stormwater Impact Assessment;
- The proposal does not adequately provide for maintenance of raingardens;
- Delineation of the private and public components of the stormwater network is needed in relation to the proposed JOALs
- There is an inconsistency in the assumptions for imperviousness across the application documentation;
- Controls on zinc and copper building materials require consent notices; and
- The stormwater management approach should be revisited with mana whenua input.

The draft technical comments provided by Tiaki Wai identify that the proposed approach does not demonstrate that the adverse effects on the sensitive receiving environments of Te Awarua-o-Porirua Harbour Taupō Stream and and Kakaho Stream will be appropriately avoided, remedied or mitigated. This is of particular concern given Te Wai Ora o Pāirua — the Porirua Harbour Accord.

Tiaki Wai has proposed additional consent conditions to address these issues. I support the additional conditions proposed by Tiaki Wai.

6.5.1.4.2 *Retention Wetlands for Hydraulic Neutrality*

I understand from the technical comments of Tiaki Wai that there are a number of fundamental consent-level issues relating to the proposed retention wetlands. The proposed stormwater management strategy of combining 'natural inland wetlands' achieving ecological mitigation with stormwater management devices is not supported by Tiaki Wai. Other fundamental issues include:

- There is no clear options assessment or a safety in design assessment in the application documents demonstrating how alternative stormwater management approaches were considered;
- The proposed staging results in the retention wetlands A, C and E being delivered after the completion of significant upstream residential stages (retention wetland A) or all upstream residential stages (retention wetlands C and E).;
- The proposal seeks to create 'retention wetlands' to achieve both ecological mitigation and stormwater management;
- The maintenance requirements have not been adequately provided for;
- Pre-treatment in the form of a gross pollutant trap and / or sediment forebay has not been provided;
- Rain Garden 01 is located within the flood management area associated with Wetland B;
- Wetland D is a 'constructed wetland' rather than an 'natural inland wetland', the wetland is not required for treatment purposes, is not supported by an engineering design, and is 'perched' above the Muri Road development. The design as presented is not supported by Tiaki Wai.

Tiaki Wai has proposed additional consent conditions to address some of these issues but have identified that the Stormwater Management Plan should be revised before consent is granted. I support the position of, and the additional conditions proposed by, Tiaki Wai.

6.5.1.5 *Other Matters*

6.5.1.5.1 *Stormwater outlets*

The proposed stormwater system includes outlets within reserves, Lot 5003 and at the site boundary. These have associated easements identified on the proposed scheme plan. For the outlets within the reserves, these are shown on plans identified as '1753-02-1010'. For the outlets with proposed Lot 5003, which will be retained as private land by the current owner, these are shown on plans identified as '1753-02-1004'.

I do not consider the discharge of stormwater within reserves to be appropriate. This can lead to significant erosion and land instability issues that must subsequently be managed by the Council. It is noted that the Draft Code of Development Standard also states at section 8.5.1 that

Infrastructure must not be installed in land to be vested as reserve, except where:

- *The infrastructure is necessary for the functioning of the reserve; or*
- *The reserve is to be vested specifically for infrastructure purposes.*

The proposed locations of below and above ground infrastructure in land to be vested as new reserve must be approved by the Manager Parks and City Services to ensure that the usability, access and amenity of the site is not compromised.

I consider that the proposed outlets within Lot 5003 will likely create significant issues for the eventual asset owner as these will be located within private land and will effectively create overland flow paths for stormwater from the proposed development within the area that will become the adjoining site. While easements for the outlets are proposed providing access, these only cover the infrastructure itself and likely would not provide sufficient space for maintenance activities at the outlets themselves. The width of the proposed easements is not noted on the proposed scheme plan.

The easements for the outlets within Lot 5003 are proposed to be granted to Porirua City Council. As mentioned above, Porirua City will not be the owner of any three waters assets.

The proposed stormwater infrastructure includes a discharge outlet at the site boundary to the south (the Skaiffe Block). Stormwater which is discharged through this outlet is not passed through any of the proposed 'retention wetlands'. It is not clear how this discharge location would affect flooding hazards on the adjoining land or how the catchment achieves hydraulic neutrality.

6.5.2 Electricity and Telecommunications

The subdivision standards for residential zones in SUB-S7 require that all new allotments must have provision for fibre optic cable and electricity connections to the legal boundary of the allotments (clauses 1 and 4). The infrastructure plans for the proposed development do not include any plans for electricity of telecommunications infrastructure on the site. The plans '1753-02-5000-R1-Water&Services' attached as Appendix 30-31 to the application show a 'Proposed Service Trench' and state:

Services Notes:

- 1. Power, gas and telecommunications service trench to generally follow watermain locations.*
- 2. These utilities will be shown upon receiving their specific utility design plans and incorporated into envelopes plan set*

The proposal does not demonstrate compliance with clauses 1 or 4 of SUB-S7 as no plans are provided for the proposed electricity or telecommunication networks. Given the 'Service Note', it may be able to be assumed that these will be laid within the 'service trench'; however, this is not explicitly stated in the application, and no typical cross-sections of the proposed trench are provided. I note that the Civil Infrastructure Report states that no gas network is proposed for the development.

In relation to electricity, the Civil Infrastructure Report states that:

Wellington Electricity (WE) have advised that some reinforcement of their existing network will be required to enable power supply to the site. Wellington Electricity are currently preparing an assessment to identify the necessary network upgrades

No information on the necessary network upgrades has been provided in the application.

Additionally, as identified in Appendix B, the application does not provide a full assessment of standard SUB-S7, as assessment of clauses 4 and 5 have been omitted. Clause 4 relates to electricity connections to boundary of allotments, as noted above. Clause 5 states:

- 5. At the time of subdivision, sufficient land for telecommunication network infrastructure, transformers and any associated ancillary services for telecommunication and electricity supply must be set aside. Any subdivision consent application must include:*
- a. Identification of the land on any subdivision scheme plans; and*
 - b. Written confirmation that the land identified is sufficient for the intended purpose from a relevant network operator or other suitably qualified and experienced professional.*

The scheme plans, or any other plans provided with the application, do not identify the land required for telecommunication network infrastructure, transformers and any associated ancillary services for

telecommunication and electricity supply, or any written confirmation that the land identified is sufficient for the intended purpose.

Without plans provided in accordance with clause 5 of SUB-S7, there may be issues that arise through detailed design with conflicts between telecommunication and electricity infrastructure required to service the subdivision, and other infrastructure, planting or structures within the road corridor. The Applicant may in the future seek to locate the telecommunication and electricity infrastructure within reserve land to be vested to Porirua City in order to avoid such conflicts. This would not be appropriate and should be avoided.

6.6 Parks and reserves

The proposal includes extensive areas of recreational reserve land along with five parks. A network of tracks is proposed that traverses the development. The reserves, parks and tracks are described in the MLUDS.

The Structure Plan identifies two types of parks to be provided, 'Neighbourhood Reserves' and a 'Neighbourhood Community Park'. The Neighbourhood Reserves are smaller local parks, while the Neighbourhood Community Park is the larger park adjacent to the commercial centre. These correspond with the terms for Neighbourhood Reserves in the Draft CODS, being 'Neighbourhood (Local)' and 'Neighbourhood (Community)' respectively. For consistency and clarity, it is this draft CODS terminology that is used in the section below for these parks.

6.6.1 Parks Technical Review

The parks and reserves proposed for the development have been assessed by the Parks team within Porirua City. The comments from the Parks team are provided as part of the Council's comments on the application. The sections below summarise those comments. The comments relate to the 'green elements' (reserves and planting), streetscapes, tracks, and playgrounds proposed in the development.

6.6.1.1 Green Elements

The 'green elements' of the proposed parks and reserves include the reserves, parks, ecological matters, and planting proposed.

Overall, the size and layout of the reserves are appropriate. The sites within the 'Lower Terrace' and 'Upper Terrace' are generally located away from the edge of the development, making them more accessible to the surrounding houses. However, there are issues identified including:

- Open space and recreational values to be provided in the parks and reserves is not articulated within the application documentation. It is therefore not clear what the outcome of the parks and reserves is sought to be;
- The MLUDS and LEPs do not provide sufficient details of the proposed parks and reserves;
- The proposed ecological enhancements of the reserves that are being vested to Council have not been clearly articulated;
- Targeted remediation of wetlands and rehabilitation of earth-worked areas are mentioned in the MLUDS, but this is not further explained in the application documentation;
- There has been no detailed assessment provided of the fill and cut faces within the reserves and the remedial work proposed for earth-worked areas;
- The proposed species for planted areas are not supported by the Parks team. A wider variety of trees and plants is needed to increase their long-term health;
- Additional planting along the top edge of the ridgelines and along the proposed pathways would also be beneficial.
- The extent of the existing pine trees to be removed and retained is not provided and needs to be demonstrated on a plan. A plan for wilding pine control is necessary.
- Consideration of planting in erosion prone areas is needed;
- There are no plans for lighting of street entrances for reserves. Lighting should also be provided for paths and areas identified as safe routes within the parks as identified through Crime Prevention Through Environmental Design (CPTED) analysis.
- It is not clear what stormwater management is proposed for the open space network. The management of scour on slopes where stormwater discharges will flow down steep faces within the proposed reserves has not been sufficiently detailed.

6.6.1.2 Streetscape

Overall, the Parks team consider that the Landscape and Ecology Plans (LEPs) require more detail to be able to understand the proposed streetscape. This includes demonstrating the location of street trees, lighting, driveways, berms and services to understand how these different components work together and will avoid conflicts between the various plans.

As noted above in relation to the urban design review, the MLUDS identifies fencing of the proposed residential allotments along street frontages. However, the fencing specifications for private properties along street frontages, adjacent to access lanes and reserves is not provided in any plans. As such, these fencing specifications should be required through conditions and submitted to council for certification.

6.6.1.3 Tracks

The proposal includes tracks within parks and reserves to comply with the requirements of the Structure Plan. Concerns with the proposed tracks network include:

- The lack of a connection to Ara Harakeke;
- The proposed footpaths at the entrance to the development creates three road crossings to go from the area around Lot 1 to the state highway;
- There are no off-road track connections shown to the north boundary apart from the footpaths along the two roads;
- The Structure Plan shows four off-road track connections to the south. The proposed development only provides for two indicative off-road connections to the south and one on-road connection;
- Proposed Lot 5003 creates a gap that prevents a future connection to the south via the road;
- The eastern connection has not been provided for in the scheme plan. The eastern connection should be provided by way of a easement over the Lot 5003 along the ridgeline fence. There are two existing examples in Porirua where public walkways cross over private rural land by means of easements (Taua Tapu Track and the Colonial Knob Track);
- Currently there are limited access options provided to access to Lot 5003, which will constrain future opportunities;
- The design and layout of potential off-road track connections, as the plans provided with the application do not demonstrate how the tracks meet the Council track standards;
- There is no information about the users each track is aimed at and the user classification;
- The lack of information on track gradients and contours makes it difficult to determine the scale and steepness of the tracks. Some tracks directly traverse down contours, which may be very steep;
- There is little detail on the design of the tracks. More detail than what has been provided including basic design analysis and rationale for the tracks design is normally expected with resource consent applications. Overall, the methodology of the track design is unclear;
- Insufficient planting around the proposed tracks;
- The proposed tracks mainly provide fragmented sections of tracks through steep land between residential areas;
- The MLUDS shows track connections, but it appears that they have not been developed in conjunction with the other plans and potentially may be undeliverable; and
- The plans often show proposed drainage reserves as being the trailhead track entrance into a wider reserve. As the drainage reserves will be owned and managed by a separate organisation from the Council (Tiaki Wai), the management and formation of tracks within the drainage reserves will require ongoing access.

Additionally, it is noted that the proposed wastewater bulk main upgrades within the Ara Harakeke pathway area will have temporary impacts on the pathway users. There are no alternative pathways for the public near the Ara Harakeke pathway. Therefore, the works need to be carried out with public access provided for on a constant basis. A detailed pedestrian management plan that addresses how access will be maintained during works should be required as a condition.

6.6.1.4 Playgrounds

The proposal includes a number of playgrounds within the proposed parks. Overall, the proposed playground locations and sizes are appropriate. However, more detailed planning of the playgrounds should be required through conditions to ensure that the intended outcomes are achieved, noting that the MLUDS provides only high level concepts of what might be provided.

6.6.2 Planning comments

Based on the comments from the Parks team summarised above, I consider that a range of additional conditions are necessary to address the design and specifications of the various aspects of the proposed reserves and parks. Additional information may be required to inform those conditions, including information to address the location and design of tracks across the various disciplines to ensure that what is proposed is deliverable.

Additionally, as noted above in relation to the urban design review provided McIndoe Urban, the status of the MLUDS is not clear as it does not provide a firm proposal but only possible indicative outcomes. The status of the MLUDS as it relates to the design of the proposed parks should be clarified.

6.6.3 Summary

Overall, the plans for parks and reserves would benefit from more detail and there is a disconnect between the plans that have been provided with the application.

More information on the proposed reserves, such as gradients, parcel size, is needed across all plans. More detail is also needed in relation to proposed planting, including locations, species and rationale. There is also insufficient detail about the proposed reserves and tracks such as dimensions of flat space, contours, grades of individual tracks. There is a disconnect between the Structure Plan and the conceptual plans provided in the MLUDS, specifically the proposed future connections.

These issues can largely be addressed through appropriate consent conditions. Some additional information may be required to inform those conditions. I also note that additional work is required in relation integrating track location and design across the various disciplines.

In my view, additional conditions are necessary to address the matters above. These are set out in section 7.2.4.

6.7 Landscape, natural character and visual amenity

The application included a Landscape and Visual Effects Assessment (LVEA) at Appendix 21, prepared by Mr Brad Dobson of Blac Limited. The LVEA concludes that the landscape and visual effects of the proposal will be low and, in many cases, positive.

6.7.1 Review of LVEA

The LVEA has been reviewed by the Council's Landscape Architect, Mr Andrew Gray. Mr Gray concludes that he agrees with the main findings of the LVEA.

The one area of contention identified by Mr Gray is the landscape and visual amenity effects on users of SH59 in the vicinity of the proposed new intersection. Mr Gray identifies that the Landscape and Ecology Plans (LEPs), attached as Appendix 23 to the application, do not propose any landscape planting within the road reserve of the state highway. These specifically identify landscaping within the proposed roundabout as '*Planting to be considered separately* [sic]'.

While the plans for the intersection at Appendix 30-35 - 1753-02-8300-R2-SH59-Roadway identify areas of 'Grass Berm' and 'Batter Slope / Landscape Area', this does not provide any information on the proposed landscaping for these areas. Review of other associated plans provided with the application has not identified any proposed landscaping for these areas.

Mr Gray proposes that additional resource consent requirements be included for the provision of landscaping within the SH59 road reserve, and notes that this would need to be developed with NZTA as the road controlling authority.

Consequently, in my view, the conditions of consent should include an additional condition for landscaping within the SH59 road reserve. The relevant consent conditions should also address the wider works within the SH59 road reserve, specifically the reinstatement of the areas within the road reserve that will be affected by the proposed wastewater main upgrades south of the site and the installation of the new water supply main north of the site.

6.8 Terrestrial ecology

The proposal will have effects on terrestrial biodiversity. An Ecological Assessment was provided with the application. The proposal includes removal of significant natural areas (SNA) identified within the PDP, with proposed mitigation in the way of offsets areas. Areas of SNA and associated buffer areas within the development site are also proposed to be protected in perpetuity in accordance with the requirements of the NGDA chapter of the PDP.

The comments below summarise a technical review from Wildlands of the Ecological Assessment provided by the Applicant, as well as planning comments.

6.8.1 Wildlands Review

Porirua City engaged Wildlands Consultants to undertake a review of the Ecology Assessment provided with the application. Wildlands initial comments were provided to the Applicant prior to the lodgement of the application. No changes to the proposal or Ecology Assessment were made in response to those comments. A response to the comments was provided by the project ecologist in appendix J to the 'Memorandum from applicant in response to Minute 2' provided on 2 July 2026. Wildlands' updated review comments are enclosed with the Council's comment. A summary is provided in the sections below.

6.8.1.1 Vegetation assessment

6.8.1.1.1 Vegetation mapping

Vegetation mapping of the site has not been undertaken. There are inconsistencies in the estimates provided in various documents. Small areas of indigenous scrub have ecological value. The accuracy of the estimates of vegetation clearance provided by the project engineers relies on an assessment of all vegetation types and habitats, which has not been provided.

6.8.1.1.2 Delineating areas to be cleared

Following provision of vegetation mapping, clarification is required of each vegetation type that will be lost. The ecological value associated with each vegetation type must be correctly managed under the effects management hierarchy.

Estimates of the loss of SNA as a result of the proposed intersection provided to Wildlands by the author are 1,338 square metres of indigenous forest west of SH59 (within SNA027), and 687 square metres of indigenous scrub east of SH59 (within SNA029). These areas are identified in Figure 14 below.¹²

¹² Based on the plan at in Appendix 30-40 - 1753-02-SK9200-R1-Ecological Remediation. That plan was georeferenced in ArcGIS and the areas of SNA within the earthworks construction footprint were traced and converted to a polygon. Those polygons were then overlaid on the 1995 aerial.



Figure 14: Approximate areas of SNA029 and SNA027 to be removed to enable the proposed roundabout overlaid on 1995 aerial photography

Source: PCC GIS data, Appendix 30-40 - 1753-02-SK9200-R1-Ecological Remediation

The ecological effects of the loss of the area of indigenous scrub/forest within SNA029 has not been accurately assessed. The Ecological Assessment says that it should not have been identified as SNA as it was not 'barely evident' in the 1995 aerial. However, as shown in Figure 14 the area was present in 1995. As such, the value of this vegetation and the potential ecological effects of its loss have not been accurately assessed.

6.8.1.1.3 Loss of indigenous scrub

6.8.1.1.3.1 Effects assessment

As the indigenous scrub is relatively young, it is agreed that it is unlikely to be SNA. However, its loss is not a negligible effect. The fragments provide refuges and corridors for indigenous species. Based on EIANZ guidelines, that overall effect would be 'low'.

Biodiversity outside of SNAs is recognised in the NPS-IB. Effects rated as 'low' under EIANZ methodology can contribute to loss at a landscape scale. Based on the provisions of the NPS-IB 'low' level effects should be addressed. Management of the loss of indigenous scrub on the property should therefore follow the effects management hierarchy.

6.8.1.1.3.2 Indigenous vegetation offsets

The Ecological Assessment report states that indigenous vegetation loss will be offset or remedied by planting an area between SNA029 and SNA225. It is difficult to determine if the proposed offset is appropriate without the information of different habitat types where clearance and offsetting will occur.

The offset ratio used in the Ecological Assessment of 3:1 is a low replacement ratio for mature indigenous-dominant forest with significant ecological values (an assumption has been made by the ecologist about the type of forest, as no information on this has been provided by the applicant). The Ecological Assessment relies on the Ecological Compensation Ratio used in the Transmission Gully project for indigenous forest but this may not be appropriate. A Biodiversity Offsets Accounting Model

(BOAM) that is specific to the project should be used to ensure an appropriate offset ratio is calculated. In the absence of empirical data from a BOAM a more conservative ratio of 7:1 should be applied.

6.8.1.2 Terrestrial fauna values

The Ecological Assessment provided by the applicant has not considered the potential for bat roosting habitat in the large pines and macrocarpa trees, ground-dwelling lizards in rank grassland habitat, and arboreal lizards that could be present in the small area of SNA029 that is to be removed. Indigenous birds are also present in the indigenous vegetation within the construction footprint.

6.8.1.2.1.1 Bats

Based on the Wildlands review, an acoustic bat survey should be required before construction commences. If long-tailed bats are recorded during the survey, a Bat Management Plan (BMP) will need to be prepared and implemented. These matters could be addressed as conditions of consent.

6.8.1.2.1.2 Indigenous birds

A list of birds that may occur at the site is not provided in the Ecological Assessment. Several indigenous birds within indigenous scrub on the property and within the construction footprint were observed during the site visit. Vegetation on the site likely provides foraging and nesting habitat for indigenous and other Not Threatened birds. It is possible that other rare and threatened bird species occur at the site. There could be direct effects on these species from indigenous scrub and forest clearance. Nest checks should be included as a consent condition for all indigenous scrub or forest habitats across the entire construction footprint and rank grassland habitat. If active nests are detected immediately prior to vegetation clearance, an appropriate setback will need to be implemented to avoid harming chicks and eggs. Nest relocation must not be considered as a management option.

6.8.1.2.1.3 Indigenous lizards

The lizard survey supplied in June 2026 provides information on the lizard species found to be present at the site. The Lizard Management Plan (LMP) needs to be updated to reflect the findings of the lizard survey. Significant deficiencies in the proposed LMP are described, with key questions unanswered. Recommendations on the LMP are provided by Wildlands.

6.8.1.3 Conclusions

The review from Wildlands concludes that the Ecological Assessment remains incomplete. It identifies that the points in Table 2 below should be addressed through the provision of additional information.

Table 2: Terrestrial biodiversity information required

Area	Further information required
Indigenous vegetation	a. A clear description of the proposed works and the extent of clearance of each vegetation and habitat type is needed to quantify effects on vegetation and habitats.
	b. Vegetation and habitat type descriptions should include extents for all habitat types, including different categories for grazed and ungrazed grassland habitats.
	c. In the absence of information on extents of vegetation and habitat types, it is not possible to properly evaluate effects on indigenous fauna and flora.
	d. For offsetting the loss of indigenous vegetation, the author should provide empirical data that supports the use of the 3:1 offset ratio.
	e. They should also consider the loss of indigenous scrub and provide details on how that loss will be managed by applying the effects management hierarchy.
	f. The author needs to provide further details on the recipient site, including descriptions of the existing vegetation cover, the total areas that will be available for restoration, and how restoration will differ depending on the stated goals (i.e. restoration of the habitat to provide for translocated lizards, or restoration of the site to offset the loss of indigenous vegetation).
Bats	a. There are potential bat roosts at the site that will be affected by the proposed works (e.g. removal of mature pines, macrocarpas, etc).
	b. Results from a search of the Department of Conservation Bat Database search should be reported.
	c. An acoustic bat survey may also be required if bats have been reported within 25 kilometres of the site, and within the last ten years.
Birds	a. Nest checks should be included as a consent condition for rank grassland and indigenous scrub and indigenous forest habitats across the entire construction footprint.
	b. Relocation of indigenous bird nests should not be undertaken at any time.

Lizards	a. An updated Lizard Management Plan is required with appropriate management options for effects on Threatened – At Risk lizard species (copper skink). The updated LMP should include: i. Contingency options should be described, e.g. for unexpectedly large numbers of lizards, unexpected species, release site failure, etc. ii. An explanation as to how the applicant plans to undertake the necessary survey and salvage prior to vegetation clearance if safety is an issue for these forested sites. iii. Lizard-proof fencing at the release site to prevent lizards returning to salvage areas. iv. Further descriptions for the receiving sites (e.g. relative lizard abundance in forest, scrub, and grassland sites, and the existing vegetation cover) v. Undertaking predator control at the Karehana Bay Scenic Reserve release site for at least five years to allow released lizards to establish and spread. Bait stations should be spaced appropriately to also target mice, and the predator control should be appropriately costed, including paid time for field contractors.
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6.8.2 Planning comments

6.8.2.1 SH59 Intersection

The proposed intersection with SH59 that will provide access to the site in the long-term results in a loss of an area of SNA027 and SNA029 within the road corridor. The area of the loss of SNA027 and SNA029 is shown in Figure 14 above.

The ecological advice provided to Porirua City by Wildlands identifies that clearance of indigenous forest within SNA027 will further fragment this already fragmented forest patch and thereby fails to comply with Section 3.10 (2) (c–e) of the NPS-IB. It is noted that the intersection would be ‘specified infrastructure’ under the NPS-IB, and therefore the effects management hierarchy needs to be applied.

It is noted that policy INF-P21 is the relevant policy for upgrades to infrastructure within SNAs and therefore relates specifically to the proposed intersection with SH59. Policy INF-P21 requires that upgrades to infrastructure are only to be allowed where it can be demonstrated that:

1. *There is an operational need or functional need that means the infrastructure's location cannot be avoided; and*
2. *Any adverse effects on indigenous biodiversity values within areas identified in SCEHD7 - Significant Natural Areas are addressed in accordance with ECO-P2 and the matters in ECO-P4, ECO-P11 and ECO-P12.*

I consider that an operational need or functional need for the location of the intersection within SNA027 or SNA029, such that the location cannot be avoided, has not been established. While a brief options assessment has been provided in the Integrated Transport Assessment provided with the application, in my view, this does not provide sufficient information or analysis to conclude that the location of the proposed intersection within SNA027 or SNA029 cannot be avoided.

Additionally, it appears that the effects management hierarchy in ECO-P2 has not been applied to the area of proposed loss of SNA027 or SNA029. As noted above, the effects management hierarchy under the NPS-IB is required to be applied under the policy statement.

6.8.2.2 Legal protection of SNA and buffer areas

Areas of SNA and buffer areas proposed to be legally protected in perpetuity in accordance with the requirements of DEV-NG-R3 of the PDP are located within road reserve (lots 2000, 2007, 2008 and 2013), as identified in section 6.4.6 above. As roads are not issued with a record of title, those cannot be legally protected in perpetuity as required in the DEV-NG chapter of the PDP. As such, changes to the proposed scheme plan are required.

6.8.2.3 Planting of reserves

The proposal includes retirement of relatively large areas of land proposed to be vested as reserve. Those reserves include streams, wetlands, lizard relocation areas and fill slopes that are proposed to be planted, as identified in the LEPs. However, there are also relatively large areas that are identified as ‘land left to regenerate’.

As discussed in 6.6 above, additional areas of the reserves are identified by the Parks team which should be planted. This includes buffer areas adjoining tracks and residential allotments. This would occur in areas identified as ‘left to regenerate’. However, there are also other opportunities within the reserves for planting to contribute to the restoration and maintenance of indigenous biodiversity on the site. This would

be particularly beneficial where the areas identified as 'land left to regenerate' are small pockets surrounded by other planting, as circled in red in Figure 15 below.



Figure 15: Areas of potential additional planting
Source: Appendix 23 - Landscape and Ecology Plans Part A

Planting within these areas would assist to create a more rational planting plan that avoids small pockets of land left to regenerate that would require additional management and would assist to better give effect to clauses 2 and 3 of ECO-P7 of the PDP. This could be achieved through additional wording in the proposed condition requiring updated LEPs.

6.8.3 Summary

The technical review undertaken by Wildlands of the Ecological Assessment provided by the Applicant identifies significant deficiencies and that the ecological assessment remains incomplete. Additional information required for the consent process is set out in relation to indigenous vegetation, bats, birds and lizards.

The loss of areas of SNA027 and SNA027 as a result of the proposed SH59 intersection has not been adequately assessed against the relevant policy framework, and the proposed legal protection of some SNA and buffer areas cannot be achieved. Additional areas for planting within the proposed reserves are proposed to better give effect to policy ECO-P7 of the PDP.

6.9 Natural hazards

The PDP identifies areas of flood hazards areas on the site. The mapped Fault Rupture Zone for the Pukerua Fault is approximately 400 metres northwest of the site. Landslides and liquefaction are also additional geohazards that may affect the site.

6.9.1 Flooding

The Applicant has provided a Flood Assessment and Model Build report at Appendix 11 Part B of the application. Detailed comments on natural hazard risk associated with flooding, including review of the Flood Assessment, will be provided by Tiaki Wai, and should be read alongside these comments.

Figure 8 in the Draft SMP is stated as showing 'draft' flood mapping. It appears that the maps shown in the figure are in fact the operative mapping in the PDP.

I understand that Tiaki Wai does not consider that the proposed approach in the stormwater management plan demonstrates the adverse effects of the development on the wider area of flood hazard, in particular the existing flooding downstream of Taupō Swamp.

I understand that, based on the draft comments provided by Tiaki Wai that I have reviewed, that a revised flood model and stormwater management approach is considered necessary before consent is granted, with Engineering Approval conditions required addressing detailed design, construction, operation, maintenance, vesting and handover matters only after the consent-level stormwater effects have been resolved.

6.9.2 Geohazards

Porirua City has recently released draft district-wide assessments and maps for landslide and liquefaction hazards. The maps are available on the council website.¹³ The maps show that significant areas of the site are potentially affected by landslide hazards, while large areas are 'undefined'¹⁴ in terms of liquefaction vulnerability. This is generally consistent with the geological constraints identified in the Geotechnical Investigation report provided with the application.

6.9.2.1 Geotechnical review comments

Geohazards are assessed in the Geotechnical Investigation report provided with the application. The Geotechnical Investigation report was reviewed by council's geotechnical advisors, Tonkin and Taylor (T&T). T&T provided review comments at earlier pre-application stages, which were responded to by the project geotechnical engineers (ENGEO).

The updated review comment register provided by T&T sets out where the issues identified in previous reviews have been resolved or can be resolved through consent conditions. The vast majority of the identified issues are identified as being able to be resolved through consent conditions; however, there remain two outstanding issues, both relating to the design of the 'retention wetland' embankments. The updated review comment register provided by T&T is further discussed at section 6.11 below.

As such, it is considered that, while the majority of risks associated with geohazards can be appropriately mitigated through detailed design and associated consent conditions, further information would assist in relation to the 'retention wetland' embankments which cannot be addressed through consent conditions.

6.9.3 Summary

The site is subject to a range of natural hazards including seismic, landslides, liquefaction and flooding. Based on the draft comments from Tiaki Wai, further flood modelling is required in order to demonstrate that flooding is not worsened in areas outside of the site. Geohazards have been considered in the Geotechnical Investigation, with the majority able to be managed through consent conditions. However, risks associated with the 'retention wetland' embankments require further information to be provided which cannot be addressed through conditions.

6.10 Transport

The proposal includes significant new transport infrastructure, including an internal road network and a new intersection on SH59. The application includes an Integrated Transport Assessment (ITA) which assesses the traffic and transport implications of the proposal.

6.10.1 Transport Technical Review

The transport aspects of the proposal, including the ITA, have been assessed by Mr Karthik Aale, Senior Transport Engineer, Porirua City Council. Mr Aale's technical review is provided as part of the Council's comments on the application. The sections below provide a summary of Mr Aale's assessment.

6.10.1.1 Review comments

The review states that, while the ITA is technically competent for a single site assessment, it fails to realise the integrated transport and land-use outcomes that underpin the NGDA Structure Plan. The proposed development would entrench a single-access, car-dependent suburb, contrary to Porirua's growth and carbon-reduction objectives articulated in the Growth Strategy and the Strategic Objectives of the PDP.

The technical review identifies areas of concern across a number of areas. These are summarised below:

¹³ Available here: <https://maps.porirua.govt.nz/localmaps/gallery/>

¹⁴ Meaning the Council has insufficient information to determine if a liquefaction risk exists.

- Misalignment of the proposed transport network with the Structure Plan in critical areas:
 - The road network 'spine' through the wider Northern Growth Area;
 - Southern boundary transport connections; and
 - Integration of public transport.
- The proposed intersection with SH59:
 - Reliance on maintaining a 100 kilometre per hour road environment;
 - The form of the proposed roundabout intersection and continuation of a 'rural' road environment cross-section will effectively lock in a high-speed barrier between the new urban environment on the east of SH59 and the western side's Ara Harakeke shared path; and
 - The proposed interim tee-intersection may operate acceptably for capacity but this will continue for several years within a 100 kilometre per hour road environment with multiple construction vehicle movements;
- Active mode connectivity:
 - A lack of any integration with Ara Harakeke or local amenities in Pukerua Bay;
 - The proposed collector and local roads within the development exceed walkable gradients; and
 - Multiple long cul-de-sacs are proposed which reduce the permeability of the transport network.
- Network effects and wider growth integration:
 - The ITA provided with the application included modelling of the potential traffic effects on the surrounding transport network. The area of the modelling covered SH59 between Gray Street and Plimmerton. It excluded longer-term NGDA traffic dispersal via Grays Road, SH58, and potential southward connections.
- Design quality and urban form issues:
 - The extensive cul-de-sac urban form is not in accordance with the NGDA objective
 - The extensive parking provision and car-oriented roading geometry and space allocation are inconsistent with the Porirua City's Strategic Priority for reducing carbon emissions; and
 - The proposed JOALs do not provide sufficient turning areas.

6.10.1.2 Review recommendations

Mr Aale's technical review recommends: Mr Aale's technical review

- Revision of the proposal through a coordinating NGDA Transport Master Plan confirming full-network staging, public transport integration, and corridor re-classification outcomes for SH 59;
- A revised access strategy consistent with an eventual low-speed SH 59 corridor, with an active transport crossing design included; and
- At least one additional internal transport connection to the adjoining Skaiffe Block (Part Haukopua East Block) in the location of the western Transport Connection shown on the Structure Plan, which would form a collector loop road and serve as a bus route.

6.10.2 Planning comments

The comments below relating to the SH59 intersection and vehicle crossing are provided from a general planning perspective.

6.10.2.1 SH59 transport strategy

I note that the introduction to the NGDA chapter of the PDP states that:

The main connection of the internal road layout to the wider road network is via a new access onto State Highway 59. The form of this access is to be informed by a transport strategy that will be developed in collaboration with key stakeholders and lead by the Waka Kotahi NZ Transport Agency.

The reference to a transport strategy was a response to a submission from the New Zealand Transport Agency (NZTA) on Variation 1 to the Proposed Porirua District Plan. The transport strategy envisaged by the NGDA has not yet been prepared. However, regular discussions occur with NZTA on progressing such work.

6.10.2.2 SH59 intersection upgrade trigger

Proposed condition 80 relates to 110 dwellings and the issuing of code of compliance certificates (CCCs) under the Building Act. It is not clear how CCCs could be denied under the Building Act because of a

resource consent condition. In my view a different mechanism should be used. This could be reframed through requiring construction of the intersection through the section 224 certification process or alternatively as a condition precedent whereby the construction of the intersection is required to be undertaken prior to the relevant earthworks stage (while noting the comments on tying requirements to stages above).

6.10.2.3 Active mode connectivity

To address the lack of active mode integration beyond the site, I consider that it would be appropriate to require an active mode crossing (being grade separated or signalised) to be constructed and operational before occupation of Stage 1 of the development. Alternatively, a separated active mode pathway north through the Muri Block to Muri Road could be required to be provided as part of the Mt Welcome development through a condition precedent.

6.10.2.4 Vehicle Crossings

The Applicant has applied for land use consent, including under Rule TR-R2-2.a which relates to 'All activities with on-site vehicle parking or loading spaces or where a vehicle access is otherwise provided'.

While much of the assessment in Appendix 4 of the Application appears to relate to the proposed Joint Ownership Access Lots (JOALs), the assessment against TR-S5, which relates to vehicle crossings, states that:

Does not comply – The individual residential lot driveways will be designed to these criteria, however it is likely that some driveways will not be able to fully comply, for example in terms of access separation. In such instances a consent condition is recommended requiring the design of the driveway to be developed, for later certification, to a suitable standard in keeping with the suburban setting and frontage street environment.

I note that as parking, loading spaces, and vehicle accesses are not yet part of the application for subdivision of the proposed vacant allotments, technically rule TR-R2 is not relevant.

The 'Stantec memorandum' attached at Appendix H of the information provided by the Applicant on 2 July 2026 responded to previous information from Porirua City that no plans had been provided for the proposed vehicle crossings and therefore insufficient information had been provided to enable a proper assessment of the effects.

The Stantec memorandum assesses many of the relevant standards of the Transport chapter for vehicle accesses, crossing and parking as 'Will Comply'. If this is the case, then all of these need to be included in the consent conditions. The plan provided with the memorandum identifying potential non-compliances only relates to clauses 3, 5 and 7 of TR-S5 and therefore does not represent a comprehensive analysis in my view.

While the proposed condition in the Stantec Memorandum included a clause relating to the width of the vehicle crossings, this has not carried forward into the proposed conditions provided by the Applicant. In any case, the assessment in the memorandum is considered to be insufficient to justify exceedance of the maximum width set out in clause 2 of TR-S5 as the assessment does not consider cumulative effects. Allowance for an additional 2.5 metres per vehicle crossing results in a potential additional 2.37 kilometres of vehicle crossing width along the proposed roads.

Additionally, verbal communication with the Applicant indicates that the vehicle crossings will not be constructed by the Applicant, but rather by their 'build partner'. I understand that this means that they may not be constructed by the consent holder or contractors under the control of the consent holder. If the proposed condition is intended to have enduring effect, it would need to be reframed as a consent notice.

6.10.3 Summary

There are significant technical transport engineering concerns with the proposed development. These concerns cannot all be addressed through consent conditions but rather some require reconsideration of the proposed transport infrastructure.

6.11 Geotechnical

Geotechnical aspects of the proposal are assessed in the Geotechnical Investigation report provided with the application. The Geotechnical Investigation report was reviewed by council's geotechnical advisors, Tonkin and Taylor (T&T). T&T provided review comments at earlier stages, which were responded to by the project geotechnical engineers (ENGEO). The review comments initially included 22 issues relating to the following broad areas:

- Site Investigation and Ground Model
- Liquefaction and Seismic Hazards
- Slope Stability and Rock Behaviour
- Drainage, Erosion and Fill Performance
- Materials, Settlement and Ground Conditions
- Stormwater Wetlands and Embankments
- Earthworks within covenant areas

The updated review comment register provided by T&T provided as part of the Council's comments on the application sets out where the issues identified in previous reviews have been resolved or can be resolved through consent conditions. The vast majority of the issues are identified as being able to be resolved through consent conditions, however, there remain two outstanding issues with both issues relating to the design of the 'retention wetland' embankments.

I note that resolution of some of the issues has assumed the comments provided by ENGEO will be implemented on site. For example, in relation to Issue 3, ENGEO states that "any structures within the gullies will be founded on rock". This is accepted by T&T as an appropriate response, but requires clear consent conditions to ensure that the design of the structures takes this into account.

In relation to the 'retention wetland' embankments T&T recommends that:

...a feasibility level design shall be provided to the Panel so that the potential effects of the works can be fully understand. The design shall demonstrate acceptable static and post-seismic (ULS) stability including assessment of flow-failure potential, prepared by a CPEng geo-professional. The design shall confirm that no habitable buildings, critical infrastructure or neighbouring land lie within the potential failure runout so that the consequences of failure remain low, consistent with s106 RMA, and shall document the likelihood/consequence framework (NPS for Natural Hazards).

As such, I consider that further information is required in relation to the 'retention wetland' embankments.

6.12 Contaminated land

The Preliminary Site Investigation (PSI) and Contaminated Site Management Plan (CSMP) provided with the application have been reviewed on behalf of Porirua City by Mr Kevin Tearney of SLR Consulting New Zealand. Mr Tearney's review report is provided as part of the Council's comments on the application.

In summary, the review concludes that:

- The PSI reports have been prepared by Suitably Qualified and Experienced Practitioners (SQEP) and are suitable for use as supporting specialist technical reports for the Application;
- The PSIs have identified the HAIL land within Lot 1 DP 534864 that will be affected by the planned development. This includes a potential sheep dip/spray race to the south of the main woolshed;
- The age of the buildings indicates the potential for lead and asbestos in building fabric and associated shallow soil contamination;
- The PSI recommends pre-demolition asbestos surveys of these buildings, which should be undertaken. The recommendation does not appear to have been carried through to the CSMP or the proposed consent conditions.
- It is understood that HAIL land within Lot 2 DP 534864 will not be disturbed by the planned development. This includes the potential former sheep yards and the other undetermined linear feature that is inferred were located to the east of the Helicopter Hangar, and not at the location shown on the summary figure in PDP (2022), labelled 'unidentified structure'. This unidentified structure lies within the planned development. As reported in the PSI, PDP initially interpreted the feature as a potential sheep dip/spray race but conclude that it was not used for this purpose and

label it as unidentified. This reclassification appears to be based on the site walkover undertaken for the PSI. The site walkover photographs do not indicate the presence of sheep dip/race infrastructure and the terrain does not appear to be suitable for that use;

- HAIL land is unlikely to present within Part Lot 1 DP 89102 and Lot 2 DP 89102;
- The CSMP has been prepared by a SQEP and covers the main elements required for a CSMP. It is focussed on the HAIL land but appropriately includes an unexpected discovery protocol for all properties subject to the planned development;
- Proposed conditions require an updated CSMP be submitted for certification following the DSI, prior to any remediation works, which is appropriate.
- The general scope of the proposed DSI is appropriate. However, the scope is generic and it is not clear, for example, how the investigation will be amended if groundwater is encountered and why groundwater is not being specifically targeted given that it is stated that groundwater is possibly shallow in this area of the site and contamination from sheep dips has the potential to contaminate groundwater.

The report from Mr Tearney recommends that:

- The requirement for asbestos surveys of buildings in Lot 1 DP 534864 be included in the CSMP; and
- The Applicant provides a Sampling and Analysis Quality Plan (SAQP) covering the proposed DSI for review and certification prior the DSI works. This could be offered as a consent condition.

The report includes recommended consent conditions to respond to the recommendations. These are discussed further in section 7.2.10

6.12.1 Summary

The PSI and CSMP reports provided with the application are generally appropriate. Some additional information is required relating to asbestos surveys of buildings and a Sampling and Analysis Quality Plan. These matters could be addressed through consent conditions. Appropriate conditions are included in Mr Tearney's review report.

6.13 Historic heritage and archaeology

There are no historic heritage items, extents or settings identified on the site on the Porirua District Plan 2025 planning maps. The Applicant has provided an Archaeological Assessment of Effects and Addendum to the 2019 and 2022 Archaeological Appraisal reports carried out by Clough & Associates Ltd and applied for archaeological authority as part of the substantive application. As such, I have no significant concerns in relation to historic heritage or archaeological effects.

The recommendations of the archaeological report states that the Archaeological Authority should be accompanied by an Archaeological Management Plan (AMP). This is included in proposed consent condition 33 relating to the consent holder following the conditions of the Archaeological Authority. This is potentially unnecessary, as the consent holder will need to implement the requirements of the Archaeological Authority in any case. However, it would be beneficial for monitoring and compliance purposes to have the approved Archaeological Management Plan provided to the council.

As such, additional conditions requiring adherence to an accidental discovery protocol and submission of an Archaeological Management Plan approved by Heritage New Zealand Pouhere Taonga to Council would be appropriate. These additional conditions would ensure any land use consent conditions appropriately integrate with, rather than duplicate, the archaeological authority process.

6.14 Construction management and earthworks effects

Significant earthworks and construction activities are proposed to be undertaken over a long period of time as part of the development. Appropriate management of the adverse effects of these activities will be critical. The application proposes management plans to address these effects.

6.14.1 Earthworks and Construction Management Plan (ECMP)

The application documentation includes a draft 'Earthworks and Construction Management Plan'. Generally, the draft ECMP sets out the relevant matters and provides suitable overarching framework for management of construction works on the site.

The proposed conditions included condition 16 which would require submission of a stage specific ECMP to the Manager of Resource Consents and Monitoring for certification. The amendments to the proposed conditions contained in Appendix 1 to Minute 5 included changing condition 16 to refer to Stage-Specific ECMPs.

However, there does not appear to be a consent condition for the certification of the overarching ECMP. I consider that the overarching ECMP should be certified first, with Stage-Specific ECMPs subsequently certified for each stage. An additional consent condition for the overarching ECMP is needed to achieve this. The consent conditions for the Stage-Specific ECMPs should subsequently include wording to ensure they are consistent with the overarching ECMP.

The section of the draft ECMP provided with the application on works within the SH59 road corridor is relatively light. This is discussed in more detail below.

6.14.2 Construction Noise and Vibration Management Plan

As noted in Appendix B, the application initially stated that construction noise limits in the PDP would be complied with. However, the application included a proposed condition for management of construction noise and vibration through a Construction Noise and Vibration Management Plan (CNVMP) and the proposed condition included an assumption that the limits may not always be met. Subsequently the applicant revised the application to include breaches of the relevant construction noise limits as a matter to be included in the land use consent.

The applicant provided updated application documents on 2 June 2026, which included a Construction Noise and Vibration Assessment (CNVA). I sought external technical advice on the assessment. That technical advice was that the assessment has an adequate level of technical detail and, while some relatively minor potential issues were noted, because the assessment is indicative there are no significant issues identified provided the conditions are robust. Because the technical advice was largely in agreement with the CNVA, no technical memorandum has been provided with the Council's comments; however, email communications on this matter can be provided to the Panel if this would be beneficial.

In relation to conditions, the technical advice was that, in general, the proposed conditions for construction noise and vibration are robust, with some minor corrections required:

- **Proposed condition 23:** This details specific requirements of the CNVMP. Clause (c) refers to the site noise and vibration criteria as set out in Condition 22. The criteria are not provided in Condition 22. Clause (b) of proposed condition 22 refers to a relevant PDP rule being NOISE-R2 (noting that INF-R2 is also relevant). However, this does not clearly state the site-specific noise and vibration limits. As such, for clarity, the conditions and references should be updated to provide the site-specific noise and vibration level limits.
- **Proposed condition 60:** This requires noise and vibration monitoring to occur during the first use of high noise and/or vibration generating activities in each stage of construction. However, the condition refers to providing information to Auckland Council, and the setback distances to trigger potential exceedance do not match the assessment in the report. As such, this condition should be updated to reflect Sections 6.1 and 7.1 of the Construction Noise and Vibration Assessment.

With these amendments, the noise and vibration from construction activities will be appropriately managed through the CNVMP to be certified by council.

6.14.3 Construction Traffic Management Plan

The proposed conditions include condition 22, which requires a 'final' Construction Traffic Management Plan (CTMP) to be provided to council for certification. This generally reflects the requirements set out in the ITA. However, it is noted that no draft CTMP has been provided with the application, and therefore the wording of the condition for a 'final' CTMP is slightly unusual and could be deleted. I also consider that the CTMP should include a requirement for a complaints procedure to be set out in the CTMP.

Additionally, as the works will be occurring over a long period of time (10-15 years) and in various locations within the site (noting that residents may be living in earlier stages while later stages are being constructed) and within SH59, site specific CTMPs should also be required, similar to the ECMPs and ESCPs. The initial CTMP could provide the overarching principals and procedures, while the stage or site specific CTMPs would provide the detail. Additional consent conditions would be required to achieve this.

6.14.4 Erosion and Sediment Control Plan

The proposed conditions include erosion and sediment control plans required to be submitted to Porirua City Council for certification. To avoid duplication and taking into consideration the scale of the earthworks involved and the relevant functions and capabilities of the local authorities, Greater Wellington Regional Council should take the lead in certifying the ESCPs for the site.

In terms of process, to ensure that the ESCPs will address matters relevant to Porirua City, the ESCP(s) should be provided to Porirua City Council for review and comment prior to being submitted to GWRC for certification. The final certified ECMP(s) should then be provided to Porirua City with the ECMP submitted to the council for certification. This is the approach that was adopted for Plimmerton Farm Stage One. It provides a robust but more streamlined process than submitting ESCPs to two authorities for certification.

Amendments to the proposed conditions would be required to achieve this more streamlined process.

6.14.5 Public communication

While the draft ECMP includes a complaints procedure in my experience this is often enacted too late to effectively respond to and resolve issues for the surrounding community.

In my view, communication channels should be created for the community to voice any concerns. Often, any potential complaints can be avoided or minimised with sufficient forewarning of upcoming construction works.

As such, an additional condition clause should be included requiring the ECMP(s) to set out how the surrounding community will be informed of upcoming works.

6.14.6 Wastewater storage tank

Wastewater storage is included in the summary of the proposed activities.¹⁵ The proposed location of the wastewater storage tank is Lot 1300. Lot 1300 is within Stage 1 of the proposed development adjoining the boundary with State Highway 59, near to the entrance to the site.

The proposed wastewater and stormwater network in the vicinity of Lot 1300 is shown on the plan identified as 'Appendix 30-24 – 1753-02-4100-R1-Drainage-Detailed'. An extract of drawing 4101 is provided in Figure 16 below. Additionally, the long section of the wastewater infrastructure on Lot 1300 is shown on drawing 4400 in '1753-02-4400-R2-Drainage-WW-Longsections' contained in Appendix 30-27 of the application. The long-section identifies the storage as being located below ground level, with a maximum depth of approximately 5.4 metres below ground level.

¹⁵ *Fast Track Substantive Application, Pukerua Property Group Limited Partnership, Mt Welcome, Pukerua Bay, Porirua*, 16 March 2026, page 7.

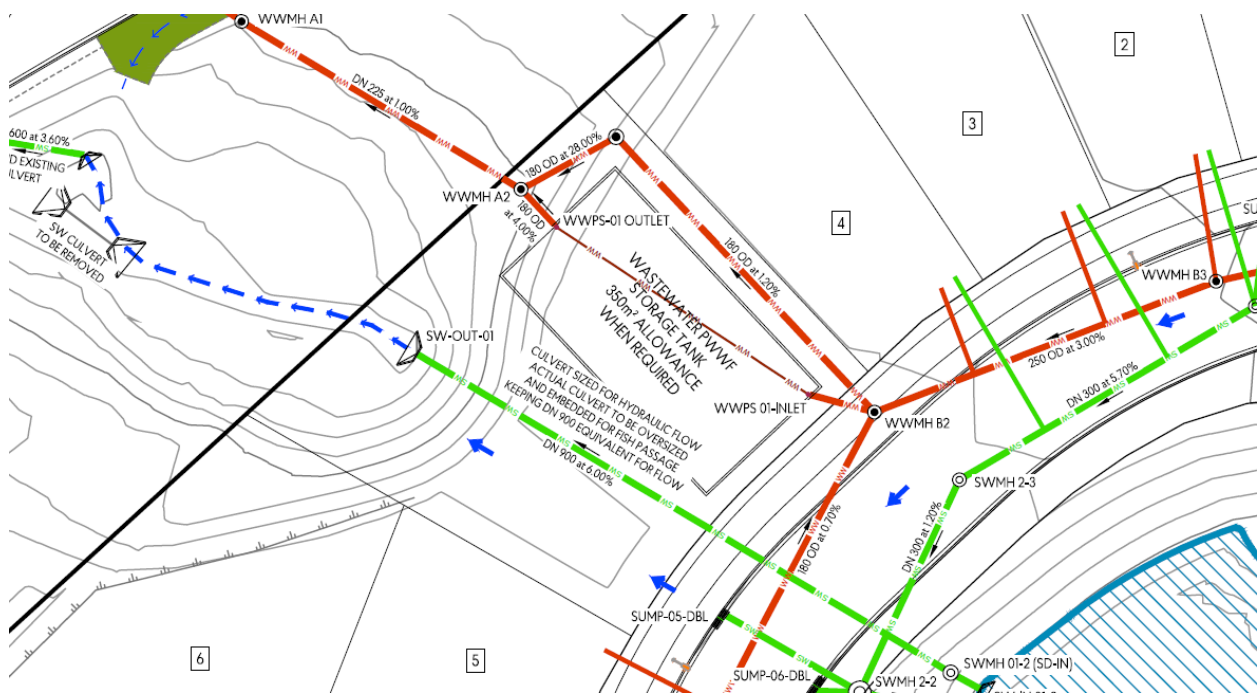


Figure 16: Location of proposed wastewater storage facility

Source: Appendix 30-24(A) – 1753-02-4100-R1-Drainage-Detailed, Drawing No. 4101

There are no conditions proposed by the Applicant that specifically relate to the proposed wastewater storage facility. It is noted that the amendments to the proposed conditions contained in Appendix 1 to Minute 3 include reference to attenuation storage at Pump Station 1.

As the location of the wastewater storage facility is located within Stage 1 and the first review of the need for the storage would not occur until much later in the development of the site (potentially Stage 12), there is a high likelihood that the construction of the storage facility would occur when there are residents living in the surrounding environment. Specifically, there may be residents living in a future dwelling on Lot 4, which directly adjoins the allotment where the storage facility is proposed.

Additionally, the allotment where the storage facility is proposed is constrained because of the proposed wastewater and stormwater pipework and overland flow path proposed to be located on the allotment as shown in Figure 16 above. I note that the wastewater pipe along the northeast boundary of the allotment would need to be installed as part of Stage 1, while the stormwater pipe which bisects the allotment is proposed to convey discharges from the 'retention wetland' to the southeast which is identified as part of Stage 5A.

As such, I have significant concerns regarding the ability to construct the proposed wastewater storage facility on Lot 1300. Robust construction management would be required in order to enable the tank to be constructed and appropriately manage the effects. Additional consent conditions are appropriate to address the need for construction management plans specific to the wastewater storage tank to address this issue.

6.14.7 Works within SH59 and Ara Harakeke

Significant works are proposed within SH59, including the new intersection, upgrades to the bulk wastewater pipe, and construction of a new water supply pipe. The location within the road reserve creates additional risks and potential adverse effects that need to be specifically managed. The draft ECMP contains some references to relevant guidelines provided by NZTA; however, this is relatively light.

Stage-Specific ECMPs should address the matters set out in the NZTA guidelines identified in the draft ECMP, along with site specific CTMPs. This would require additional consent conditions to require these to be provided to council for certification prior to construction of the infrastructure within SH59. The conditions should, in my view, also require that the management plans be provided to NZTA for review prior to being submitted for certification.

Additionally, the proposed upgrades to the bulk wastewater main within the SH59 road reserve are proposed to occur within the Ara Harakeke Pathway. This pathway is well used by the community and national and international visitors. Continuous public access will be required to be maintained to avoid disruption to pathway users. Restrictions to public access to areas of the site are addressed at a high-level, generic manner in the draft ECMP. This is also addressed to a degree by proposed condition 23, but only in relation to the construction of the SH59 intersection. In my view, additional detail is required to be provided in the final ECMP, including a stage-specific ESMPs, as well as additional consent conditions, to ensure continuous public access to Ara Harakeke Pathway.

6.14.8 Conditions

In my view additional conditions are necessary to ensure that construction and earthworks activities are appropriately managed. The conditions relating to the matters above are contained in those sections.

Furthermore, additional conditions are necessary to ensure that any updates to management plans or other construction plans are provided to council through comprehensive updates to the documents, rather than any reliance on information provided through other means. This is to ensure that council always has up-to-date records so there is no confusion in relation to plan versions and to avoid any potential consequential compliance issues.

6.14.9 Summary

Many of the potential effects of construction are proposed to be managed through management plans to be certified by council prior to construction commencing. Generally, the management of construction effects through management plan conditions is appropriate. In my view, additional detail in conditions is necessary to clarify the requirements of the management plans, streamline certification processes, and ensure that all relevant matters are addressed.

6.15 Reverse sensitivity

Reverse sensitivity is defined in the Porirua District Plan 2025 as:

means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.

DEV-NG-P2 provides for subdivision that is in accordance with the NGDA Structure Plan where the design and layout of the subdivision meets a range of listed matters. Clause 11 of the policy states:

Minimises the potential for reverse sensitivity effects and other effects at the interface of different zones within the Development Area.

The potential for reverse sensitivity at the interface of the MRZ and RLZ zones within the Development Area does not appear to be an issue, as the proposed extent of the residential development to the east is mostly some distance from the MRZ boundary and a minimum of approximately 35 metres. I also noted that reverse sensitivity effects related to State Highway 59 are managed through the relevant provisions of the PDP. Additionally, the applicant has addressed potential reverse sensitivity effects along the southern boundary by way of a 'no-complaints covenant' relating to Lots 400 to 416 (proposed conditions 121 and 122).

However, there are aspects of the proposal that are of concern which relate to reverse sensitivity. These relate specifically to the location of an existing helicopter hanger and helipad on the site.

6.15.1 Helicopter hanger and helipad

A helicopter hanger and helipad are identified as being located on the site in the PSI provided with the application. This was discussed with the Applicant but has not been addressed in the application. The PSI states at page 7 in the summary of previous reports that:

A helicopter hanger is present along the northeastern area of the site where an above ground storage tank (AST) and fuel storage for A-1 Jet Fuel. The first evidence of this hanger is the 2019 aerial image.

This hanger and helipad are proposed to be contained within Lot 5003, which is to be retained by the existing owner. Existing farming activities within Lot 5003 are stated in the application as to be continued. Presumably, the existing activities that are proposed to continue include the activities relating to the hanger and helipad.

Photographs of the hanger are provided in Appendix E of the PSI (photographs 10 and 11). The hanger is located approximately 25 metres from proposed lot 652. An aerial photograph overlaid with the proposed subdivision scheme plan in the vicinity of the helicopter hanger is provided in Figure 17 below.

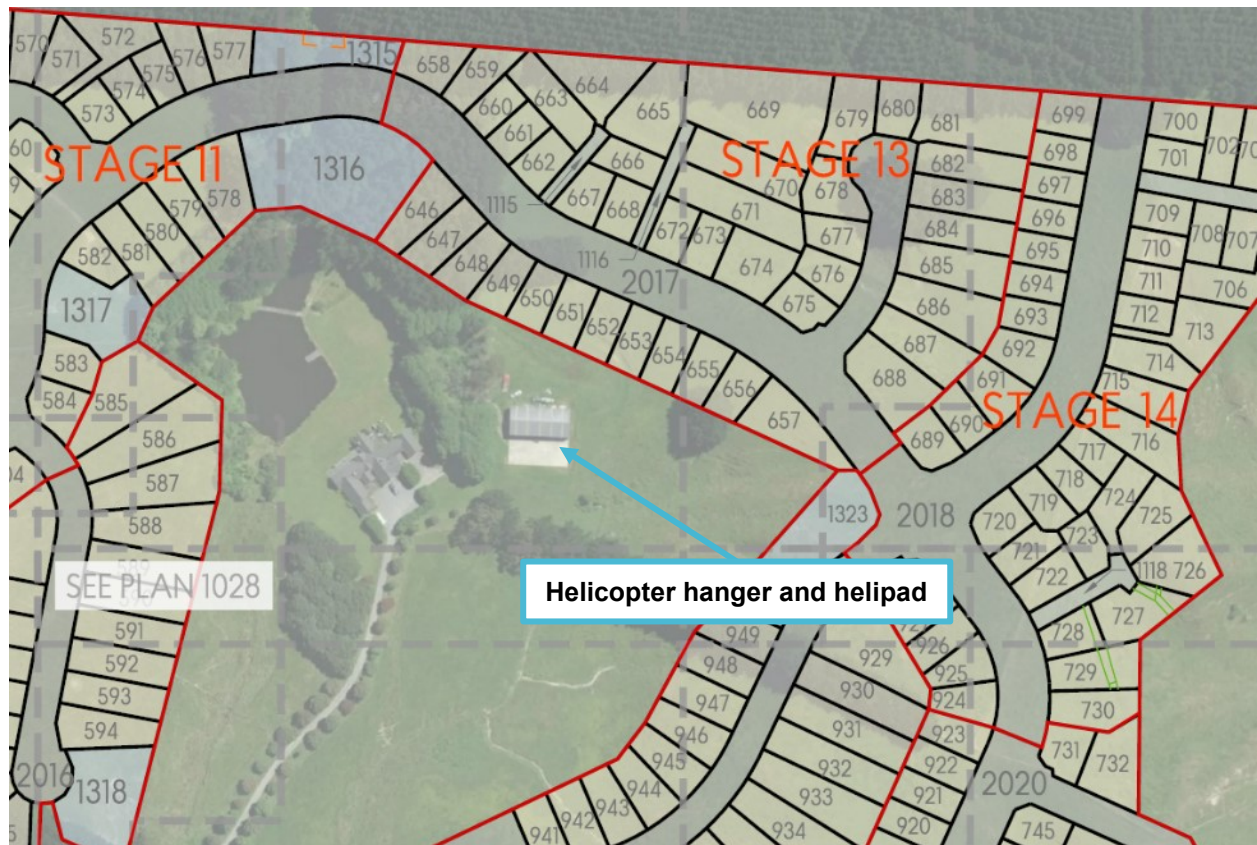


Figure 17: Helicopter hanger proposed to be within Lot 5003
Source: Drawing 1013, Updated Scheme Plan 1753-02-1010-R3

If the helicopter hanger and helipad is a legally established activity, the location of the proposed new residential allotments may result in reverse sensitivity effects that have not been addressed through the proposed development. Conversely, if the hanger and helipad and associated uses have not been legally established, then the continuation of activities relating to the hanger and helipad would likely have adverse noise effects on the new residential allotments. In my view, clear information about the continued use of the helipad and hanger, as well as potentially additional conditions are required to address this issue in either case.

6.16 Economic

The Applicant has provided an economic assessment. This states that construction of the proposal and post-construction activity will contribute to GDP and job creation, while the proposal itself will increase the range and affordability of new greenfield housing.

The Economic Assessment concludes that there will be significant economic benefits to Porirua City and Wellington region. Porirua City has not commissioned a review of this assessment. Given the scale of the proposed development, in my view the conclusion of the Economic Assessment that there will be significant economic benefits is likely to be reasonable. I also agree that the development of the site would likely increase competition in the housing market and would put downward pressure on house prices.

However, there are potential gaps in the analysis that may affect the overall conclusions reached in the Economic Assessment in relation to the assumptions made and the consideration of economic costs.

6.16.1 Assumptions

There are some assumptions made in the assessment that are not explained and may affect the scale of the positive economic benefits of the of proposal, particularly in relation to the affordability of housing in the district.

6.16.1.1 Market positioning

The economic assessment states that:

The proposal is estimated to supply dwellings to the market at an average price of \$1,060,000, with 318 (34%) priced below \$1,000,000.

The overall market position of the resulting allotments is described as a key benefit of the proposal. However, the assumptions underpinning the market positioning of the development are not explained in the Economic Assessment. Figure 2 of the Economic Assessment sets out the 'Indicative dwelling yield and price' which includes the average total sale price, with the source of this data identified as 'Envelope, UE'. It is therefore not clear where the estimated average price has been calculated by the author of the assessment, or if this information has been provided to the author by another source.

The comparison to other developments includes data on dwelling sales by price, type, lot size and floor area over 'recent sales'. The period covered by those sales data is not provided. As indicated by Figure 13 of the Economic Assessment, Porirua experienced a significant house price peak around 2022, with a significant drop in the average since that time. If the time period of the sales data for the comparison to other developments includes that peak, this may significantly skew the average and therefore compromise the validity of the comparison.

Additionally, if the benefits stated in the Economic Assessment in relation to market positioning and relative affordability of the development are to be realised with certainty, then this would need to be addressed by a consent condition. No such condition has been proposed by the Applicant.

6.16.1.2 Development Staging

The Economic Assessment appears to address the overall economic benefits of the proposed development without consideration of the spread of these benefits over a relatively long period of time.

The application states that completion of the subdivision will occur over a period of approximately 15 years, subject to market conditions. The total value added GDP from the construction phase of the proposal of \$235.3 million as stated in the Economic Assessment would therefore be spread over that 15 year period. As such, on average, this would be approximately \$15.7 million per year.

To put the economic benefits of the proposed development in context, according to Infometrics the provisional GDP for Porirua City for the year to March 2026 (2025 prices) was \$3,374 million.¹⁶ The added value GDP of the proposal would therefore be somewhere around 0.47 percent of the annualised GDP of Porirua City in the first year.

6.16.2 Economic costs

The Economic Assessment appears to focus entirely on the economic benefits of the proposal without addressing the economic costs of the proposal itself. The benefits stated could be applied to development of land anywhere within Porirua. While the Economic Assessment is not stated as being a cost-benefit assessment (CBA), there are costs associated with the development that may impact the overall benefits stated in the assessment. Some of the identified economic costs are discussed below. These costs have not been discussed or quantified in the Economic Assessment.

6.16.2.1 Southern transport connections

The southern transport connections are discussed in detail in section 6.4.3.1 above. The preclusion of two of the three transport connections to the southern boundary may have significant economic costs due

¹⁶ Available here: <https://quarterly.infometrics.co.nz/porirua-city/economic/gdp?compare=new-zealand>

to the negative impacts on the ability to efficiently develop the Skaiffe Block in the future, and on the overall ability to achieve a well-functioning urban environment in the wider Northern Growth Area.

6.16.2.2 Limiting future development potential

The proposed development includes limiting the future development of each residential allotment created through a consent notice to one dwelling and precluding any future subdivision. The ease at which a landowner can develop their land will affect the economic costs for residents. This could result in significant economic costs to future residents and the wider economy as it will preclude efficient use of residential land and the ability for a variety of housing to be achieved on the site. These costs could impact the conclusions of the Economic Assessment in terms of the assessment of its contribution to a well-functioning urban environment under Policy 1 of the NPS-UD and section 22 (2)(a)(iii) of the FTAA.

6.16.2.3 Car-centric design

The transport comments in section 6.10 above identify a car-dominant urban form and insufficient public transport integration as key issues. This is exemplified in the Economic Assessment itself which only addresses the access to employment and services within a specified drive time, without addressing access provided by the train line or potential bus services. The reliance on private vehicles will have economic costs for future residents of the proposed development.

6.16.3 Summary

I agree the proposed development may provide significant economic benefits to Porirua and the wider region. This includes through an increase in competition in the land and housing market. However, some of the assumptions in the economic assessment have not been explained, including those that underpin the market positioning of the proposed development. Additionally, the assessment is focused only on economic benefits and does not assess the potential economic costs of the proposal.

7 Consent Conditions

The application includes proposed conditions of consent at Appendix 7 (the **proposed conditions**). These have been updated, with the latest version from the Applicant being provided on 2 July 2026. Further potential changes to the Applicant's proposed conditions are set out as suggestions in Appendix 1 to Minute 5 from the Panel.

The comments on the proposed conditions below have taken into account the requirement in section 83 of the FTAA requiring that conditions be no more onerous than necessary to address the reasons for which they are set.

7.1 Overarching comments

Overall, in my view the proposed conditions put forward by the Applicant require significant work to ensure all relevant matters are addressed.

7.1.1 Mechanical review of conditions by the Panel

Any conditions imposed on an approved consent for the proposal need to be workable, practical and enforceable. While I have not undertaken a full review at the time of preparing these comments, the changes to the Applicant's proposed conditions contained in Appendix 1 to Minute 5 from the Panel are generally a significant step towards achieving that.

Prior to receiving Minute 5, I intended to put forward in this report a fresh set of conditions. However, given the significant amount of work put into the 'mechanical' review undertaken by the Panel, my comments at this stage instead focus on those conditions.

7.1.2 Not all identified issues can be addressed through conditions

While a number of matters raised in this report, and the technical reviews provided with the Council's comments, could be addressed through clearer and more robust conditions, consent conditions will not be able to address the fundamental issues identified with the proposal. This includes, for example, the significant issues raised by Tiaki Wai in relation to the three waters infrastructure and the revisions required to the design to achieve good urban design in accordance with the Structure Plan, including provision for transport connections to the southern boundary. Therefore, while high-level comments on the proposed conditions are provided below, I consider significant work is needed to ensure the proposal addresses those fundamental issues prior to more detailed comments being provided on consent conditions.

7.1.3 Consent notices vs covenants

The proposed conditions confuse the purpose, structure and requirements of consent notices and covenants. For example, proposed condition 123 is listed under the heading of 'Conservation covenants', but this is itself listed under the broader heading of 'Consent Notices'. This is somewhat confused, as covenants are not a type of consent notice. Additionally, condition 123 does not actually include any requirement for a conservation covenant (or consent notice) to be created. This means that the condition is ineffective.

7.1.4 Differences in terms used

There are differences in the terms used throughout the application and proposed conditions. These need to be rationalised to ensure that there is no confusion through implementation. For example, there is a disconnect between the scheme plan, which refers only to 'covenant area' on the plans or 'land covenant' in the schedule, and the proposed conditions which refer specifically to 'Conservation Covenant Areas identified on the Scheme Plan' (see proposed condition 101).

7.1.5 Consent condition referencing

As noted in Appendix 1 to Minute 5 from the Panel, the numbering of the Applicant's proposed conditions, including internal cross referencing, needs to be reviewed. For ease, the references to condition in the sections below relate to the numbers in Appendix 1 to Minute 5 from the Panel.

7.2 Additional and amended consent conditions

The additional and amended conditions that I consider necessary are outlined in the sections below in relation to the respective assessment areas.

7.2.1 Urban Design

Additional consent conditions are required to respond to the recommendations of the urban design review. Including:

- Requiring a consent notice on Lot 5003 for delivery of eastern track through any future development;
- Assumptions for the number of dwellings to be provided for by water, wastewater and stormwater infrastructure networks within the development;
- A consent notice on Lot 1000 requiring future development to be in accordance with a precinct plan to be developed prior to granting of the consent;
- Implementation of design guidelines; and
- Amendments to condition 110 consent notice wording.

I reiterate that many of the recommendations from the urban design review should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions.

7.2.2 Subdivision design

Again, many of the issues identified should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions. This includes, for example, providing for roading connections to the southern boundary. However, amendments to the conditions should also be made in relation to:

- Infrastructure servicing for superlots;
- The sequencing of development staging;
- The integrated delivery of infrastructure, particularly three waters infrastructure, for each stage of development;
- Amendments to the limitations on residential development proposed through consent notices to enable higher density within a walkable catchment of the commercial centre;
- Access to the proposed stream offset area; and
- Limitations on development of access allotments greater than six metres wide.

7.2.3 Infrastructure and servicing

Additional consent conditions are needed in relation to the three waters infrastructure, as identified in the comments from Tiaki Wai. I reiterate that many of the issues identified by Tiaki Wai should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions.

Similarly, revisions to plans will need to be undertaken to identify sufficient land for telecommunication network infrastructure, transformers and any associated ancillary services for telecommunication and electricity supply.

Additional conditions are needed to require undergrounding of all utility services.

I consider that, for clarity, the conditions would also benefit from an advice note stating that nothing in any approved consent obliges Porirua City to accept vesting of any allotments or assets or to approve any connection(s) to Porirua City infrastructure.

7.2.4 Parks and reserves

Amendments to conditions are needed to better integrate the proposed tracks within cut and fill earthworks areas.

Additional conditions should be included in relation to parks and reserves, to require, in summary:

- A Fire Control Plan setting out details for a low-flammability planting buffer between tracks and private dwellings, locations of planted fire breaks, and plant species, numbers, size, spacing,

layout and grade including locations and species for low-flammability plants for each of the low-flammability planting areas;

- A Pine Management Plan setting out details of the long-term management of existing pine tree belts, the removal of wilding pines that spread beyond the existing pine tree belts, and the management of pine tree stumps.
- Neighbourhood Purpose Reserve Detailed Design Plans;
- Reserve Land Landscape Planting Plan;
- Track design plan and track marking;
- Terrestrial revegetation management plan;
- Terrestrial Offset Planting and outcomes monitoring;
- Certification of construction of play equipment and play surfacing within parks with relevant standards;
- As-built plans for neighbourhood reserves, playgrounds, and tracks;
- Fencing adjoining reserves to be maintained by the owners of adjoining lots;
- The interface between the Neighbourhood community reserve and the adjoining commercial centre on Lot 1000.

7.2.5 Landscape, natural character and visual amenity

Additional consent conditions are needed to address the landscaping related to the new intersection on SH59 and associated cut faces. The relevant consent conditions should also address the wider works within the SH59 road reserve, specifically the reinstatement of the areas within the road reserve that will be affected by the proposed wastewater main upgrades south of the site and the installation of the new water supply main north of the site.

7.2.6 Ecology

Many of the issues identified should be addressed through revisions to the Ecological Assessment and plans prior to a consent being granted, as these issues cannot be addressed through consent conditions. However, amendments to the proposed conditions should be made in relation to:

- An acoustic bat survey before construction commences. If long-tailed bats are recorded during the survey, a Bat Management Plan (BMP) will need to be prepared and implemented;
- Nest checks for all indigenous scrub or forest habitats across the entire construction footprint and rank grassland habitat. If active nests are detected immediately prior to vegetation clearance, an appropriate setback will need to be implemented to avoid harming chicks and eggs. Relocation of indigenous birds' nests must not be considered as a management option.

Significant additional conditions and amendments will likely be needed following any revision of the Ecological Assessment and plans noted above.

7.2.7 Natural hazards

Additional consent conditions should be included in relation to geohazards as identified in the geotechnical review.

Additional consent conditions should also be included in relation to modelling of flooding effects within the wider environment, as identified in the comments from Tiaki Wai.

7.2.8 Transport

Many of the issues identified should be addressed through revisions to the plans prior to a consent being granted, as the fundamental issues cannot be addressed through consent conditions. This includes, for example, providing for roading connections to the southern boundary. However, in my view, amendments to the conditions are also necessary to address standard processes required to be undertaken as part of subdivisions involving the vesting of roads. The necessary amendments to the proposed conditions are contained in the technical memorandum provided by Mr Karthik Aale.

7.2.9 Geotechnical

Proposed amendments to the proposed conditions are contained in the technical memorandum provided by T&T. With these amendments, two remaining geotechnical issues would remain unresolved, which may also require additional consent conditions to be imposed.

7.2.10 Contaminated land

Proposed amendments to the proposed conditions are contained in the technical memorandum provided by SLR. With these amendments, the contaminated land issues would be fully resolved.

7.2.11 Historic heritage and archaeology

Additional consent conditions requiring adherence to an accidental discovery protocol and submission of an Archaeological Management Plan approved by Heritage New Zealand Pouhere Taonga would be beneficial.

7.2.12 Construction management

An additional consent condition should be included for the certification of the overarching ECMP, which would then inform the Stage-Specific ECMPs. An additional condition clause should be included requiring the overarching ECMP to set out how the surrounding community will be informed of upcoming works.

In relation to the requirements of the Construction Noise and Vibration Management Plan, proposed condition 22 should clearly state the site-specific noise and vibration limits.

Proposed condition 60 should reflect Sections 6.1 and 7.1 of the Construction Noise and Vibration Assessment in relation to setback distances to trigger potential exceedance.

Additional consent conditions should be included to require site-specific CTMPs, similar to the requirements for stage-specific ECMPs and ESCPs. The initial CTMP could provide the overarching principals and procedures, while the stage or site specific CTMPs would provide the detail. Additional consent conditions to ensure continuous public access to Ara Harakeke Pathway during upgrades to the wastewater bulk main are also considered necessary.

I consider that the consent conditions should be amended to reflect a more streamlined process for ESCPs. Greater Wellington Regional Council should take the lead in certifying the ESCPs for the site. The ESCP(s) should be provided to Porirua City Council for review and comment prior to being submitted to GWRC for certification. The final certified ECMP(s) should then be provided to Porirua City with the ECMP submitted to the council for certification.

Given the location of PS1 and the purposed timing of wastewater modelling and construction of any storage facility, specific conditions relating to the construction of the proposed wastewater storage facility are necessary.

Additional conditions should be included to ensure that any updates to management plans or other construction plans are provided to council through comprehensive updates to the documents, rather than any reliance on information provided through other means.

7.2.13 Reverse sensitivity

Additional consent conditions are likely necessary to manage the potential reverse sensitivity effects, or direct noise effects, relating to the existing helicopter hanger and helipad on the site and its associated uses. The structure and wording of the conditions would relate to whether the helicopter hanger and helipad and any associated activities have been legally established.

8 Consistency with RMA Planning Documents

In my view, the assessment of the objectives and policies in relevant RMA planning documents provided by the Applicant is insufficient and leads to inappropriate conclusions.

A detailed assessment of the relevant RMA planning documents is attached at Appendix A. The assessment at Appendix A identifies a number of objectives and policies with which the proposed development is (in increasing severity) not fully consistent with, inconsistent with, or contrary to. A summary of the assessment is provided in the sections below.

8.1 National Policy Statements

There are a number of national policy statements that relate to the Mt Welcome project. Within the functions of Porirua City, these are the NPS on Urban Development, NPS for Infrastructure 2025, NPS for Natural Hazards 2025 and NPS for Indigenous Biodiversity. These have been assessed in detail in Appendix A and are summarised in the sections below.

8.1.1 NPS on Urban Development

The proposal is not fully consistent with the NPS-UD. Specifically, it is not fully consistent with Objective 1 and is inconsistent with Objective 4.

The proposal would partially contribute to a well-functioning urban environment as defined in Policy 1, primarily through supporting the competitive operation of land and development markets and being resilient to the likely current and future effects of climate change.

In relation to clause (a) of Policy 6, the proposed development is not fully consistent with the planned urban built form anticipated by the PDP as there are significant departures from the Structure Plan proposed.

Therefore, overall, the proposal is not fully consistent with the NPS on Urban Development.

8.1.2 NPS for Infrastructure 2025

The NPS-I was notified in the New Zealand Gazette on 18 December 2025 and came into force on 15 January 2026. This national policy statement has not been assessed in the application. The NPS-I is relevant as the proposal include new, and upgrades to existing, infrastructure.

In relation to the objective of the NPS-I, based on the draft comments from Tiaki Wai, the proposed infrastructure, particularly the three waters infrastructure, will not be well-functioning, will not be delivered in a timely and efficient manner, nor will it appropriately manage effects on existing infrastructure. This means it will not be fully consistent with clauses (d) or (e).

As the policies generally provide direction to decision-makers, the proposal itself cannot be directly consistent or inconsistent with them; however, for completeness, detailed comments are provided in Appendix A.

8.1.3 NPS for Natural Hazards 2025

The NPS-NH was notified in the New Zealand Gazette on 18 December 2025 and came into force on 15 January 2026.

Generally, the proposal is consistent with the provisions of the NPS-NH. However, I have some concerns regarding the application of the natural hazard risk matrix, as it appears that the assessment of this has been completed by the project planner, rather than an engineering or natural hazards professional within the relevant technical reports. There are also possible errors identified in the assessment.

Additionally, there remains an outstanding geotechnical issue that cannot be addressed through conditions relating to liquefaction potential within the low-lying gully and the post-seismic stability of the embankment constructed from unsuitable material.

8.1.4 NPS for Indigenous Biodiversity

The proposal is not consistent with the objective of the NPS-IB, as the proposed intersection includes loss of an area of SNA029 without any avoidance, remedy or mitigation proposed. For the same reason, the proposal is not fully consistent with Policy 7. Additionally, based on the review of the Ecological Assessment provided by Wildlands, there may be areas on the site outside of SNAs that support indigenous biodiversity and may support specified highly mobile fauna and the loss of which is not mitigated. Therefore, the proposal is not consistent with Policy 8 or 15.

8.2 Regional Policy Statement for the Wellington Region

As noted in section 4.3.1 above, the Porirua District Plan 2025 gave effect to the RPS 2013 as it was at the time, with some consideration of Proposed Change 1 to the extent that it was relevant.

The RPS includes policies that direct lower order plans (the 'direction policies'), as well as policies that are to be considered when processing and deciding upon a resource consent and other processes (the 'consideration policies') with the intention that the consideration policies provide direction for the period before the direction policies are given effect to. As such, it is the consideration policies of the RPS Change 1 Appeals Version - Sep 2025 that are assessed in Appendix A.

The proposal is contrary to:

- Policy 57 as the proposed development does not include any public transport infrastructure within the site or connections to existing active transport infrastructure outside of the site. There is no planned public transport to or within the site. In effect, the only way to access the proposed development prior to the Muri Block to the north being developed is by private vehicle.

The proposal is inconsistent with

- Policy CC.9 as the proposed urban form does not maximise mode shift from private vehicles to public transport or active modes or support low and zero-carbon modes.
- Objective 14 and Policy 45 as, while rainwater harvesting is considered in relation to reducing stormwater discharges, it is not considered in relation to water use efficiency, or proposed to incorporate any other water use efficiency measures
- Objective 16 and Policy 47 as significant natural areas within the SH59 road corridor are adversely affected but the effects have not been managed in accordance with the provisions.
- Objective 16A and Policy EI.2A as no mitigation is proposed for effects on indigenous biodiversity outside of SNAs.
- Objective 17 and Policy 50 as no cross-sections or earthworks plans are provided of the proposed works within an outstanding natural feature or landscape (**ONFL**) and as such the matters in the policy cannot be determined.

The proposal is not fully consistent with:

- Integrated Management Objective A as the discharges of wastewater and stormwater from the site may lead to adverse effects on downstream environments.
- Objective CC.1 as no parts of the proposal relate to climate change mitigation or climate change adaptation.
- Policy CC.14 as the application considers but dismisses rainwater harvesting as an option.
- Objectives 9 and Policy 39 as the proposal does not include any ability to access the development other than by private car.
- Objectives 19, 20 and 21 and policies 51 and 52 as development is proposed within high hazard areas and hard engineering methods are proposed for risk reduction that are not part of a hazard risk management strategy that represents the best practicable option for the future.
- Objective 22 as a variety of different aspects of the development do not give effect to the related clauses.
- Policy 58 as the proposed infrastructure is not well integrated with existing water and wastewater infrastructure, or the proposed infrastructure on the site.
- Policy UD.5 as a variety of different aspects of the development do not give effect to the related clauses.

I note that any provisions relating to mana whenua / tangata whenua values and relationships will require consideration of comments provided by Te Rūnanga and have not been assessed in full here.

8.3 Porirua District Plan 2025

The Porirua District Plan 2025 became fully operative on 1 November 2025. The assessment of the objectives and policies are summarised below in relation to the relevant chapters of the Porirua District Plan 2025.

8.3.1 Strategic Objectives

The proposed development is contrary to UFD-O4 because the departures from the Structure Plan, particularly in relation to roading connections, will significantly compromise the ability to service the wider Northern Growth Area with appropriate infrastructure, particularly roading and associated active and public transport infrastructure.

The proposed development is inconsistent with strategic objective FC-O1, specifically clauses 2 and 4, as the proposed roading network within the development will not facilitate local connectivity and the proposed three waters network is considered to not provide sufficient capacity for the planned growth.

The proposal is inconsistent with strategic objectives NE-O1, NE-O2, NE-O4 and NE-O5 because of the effects on Taupō Stream and SNAs within the SH59 road corridor, and the discharges of stormwater from the site and the potential for degradation of Te Awarua-O-Porirua. The proposal is inconsistent with strategic objective REE-O5 because of an inefficient use of residential zoned land, and inconsistent with UFD-O1 and UFD-O3 because of the departures from the Structure Plan.

The proposed development is not fully consistent with FC-O4, HO-O1, REE-O1 or UFD-O6 for the reasons set out in Appendix A.

8.3.2 Energy, Infrastructure and Transport

8.3.2.1 INF – Infrastructure

The proposal is contrary to INF-P21 because an operational need or functional need that means the location of the proposed intersection with SH59 within SNA027 and SNA029 cannot be avoided has not been established.

The proposal is potentially inconsistent with INF-P23. The policy has not been assessed in the application. No earthworks plans have been provided with the application relating to the upgrading of the existing bulk wastewater main located in ONFL002, meaning the proposal cannot be properly assessed against the policy. Similarly, the lack of earthworks plans provided with the application relating to the upgrading of the bulk wastewater main of the new water main within SH59 mean that the effects on the flood hazard risks cannot be determined resulting in the proposal potentially being inconsistent with INF-P24.

The proposed development is inconsistent with policy INF-P15 because aspects of the proposed transport network are directly contrary to some policy clauses including the clause relating to no-exit roads.

The proposal is not fully consistent with INF-O2, INF-O3, INF-O4, INF-O5, INF-P5, or INF-P10 for the reasons set out in Appendix A.

8.3.2.2 THWT - Three Waters

The proposal is not fully consistent with THWT-O1, THWT-O2, THWT-P1 or THWT-P3 for the reasons set out in Appendix A, which mostly relate to the proposed three waters infrastructure not meeting the necessary standards, based on the draft comments provided by Tiaki Wai.

8.3.2.3 TR – Transport

The proposed development does not achieve TR-O2 and is inconsistent with TR-P4 as no details have been provided for the individual site vehicle connections for which consent is sought, and the proposed conditions do not sufficiently address the matters required.

8.3.3 Hazards and Risks

The proposal is generally consistent with the objectives and policies of, or is not relevant to these chapters, noting the proposed infrastructure is assessed under the INF-Infrastructure chapter.

8.3.4 Natural Environment Values

8.3.4.1 ECO - Ecosystems and Indigenous Biodiversity

The proposal is generally consistent with the objectives and policies of this chapter, noting the proposed infrastructure is assessed under the INF-Infrastructure chapter.

8.3.4.2 NATC - Natural Character

The proposal is generally not consistent with the objectives and policies of this chapter. The application itself has not assessed the provisions or demonstrated that the earthworks within riparian margins are appropriate.

8.3.4.3 PA - Public Access

The proposal is generally consistent with the objectives and policies of this chapter, noting the proposed infrastructure is assessed under the INF-Infrastructure chapter.

8.3.5 Subdivision

8.3.5.1 SUB – Subdivision

The proposed development is contrary to SUB-O2 as the proposed three waters infrastructure will not achieve the outcomes required in the objective, and is also contrary to SUB-P4 relating to the transport infrastructure SUB-P5 relating to integration with infrastructure more generally and SUB-P11 relating to subdivision for infrastructure.

The proposed development is inconsistent with SUB-O1 relating to creation of allotments as it does not achieve the requirements of associated policies. The proposed development is also inconsistent with SUB-P1, specifically clauses 1, 3, 4, 6 and 8 of the policy.

The proposal is not fully consistent with SUB-P6, as the compliance with the required size and dimension standards are not demonstrated in the application.

8.3.6 General District-Wide Matters

8.3.6.1 EW – Earthworks

The proposal is generally consistent with the objectives and policies of this chapter, noting the proposed infrastructure is assessed under the INF-Infrastructure chapter. However, no information on potential retaining structures has been provided.

8.3.6.2 LIGHT – Light

The proposal is generally consistent with the objectives and policies of this chapter, noting the proposed infrastructure is assessed under the INF-Infrastructure chapter. However, that no information on potential lighting within reserves has been provided.

8.3.6.3 NOISE – Noise

The proposal is generally consistent with the objectives and policies of this chapter, noting the proposed infrastructure is assessed under the INF-Infrastructure chapter.

8.3.6.4 TEMP - Temporary Activities

The proposal is generally consistent with the objectives and policies of this chapter.

8.3.7 Area Specific Matters

8.3.7.1 RESZ - General Objectives and Policies for all Residential Zones

The provisions of this chapter have not been assessed in the Application. The proposed development is contrary to RESZ-O1, RESZ-O3, RESZ-P1, and RESZ-P2 as it includes limiting the future development of all residential allotments through a consent notice to one dwelling per allotment and precludes any future subdivision of those allotments.

8.3.7.2 MRZ - Medium Density Residential Zone

The proposal is not fully consistent with MRZ-O1, as, while the Masterplan and Landscape Urban Design Strategy provided with the application includes proposals that would assist to achieve the objective, the application contains no mechanisms to ensure that these will be implemented.

8.3.7.3 NCZ - Neighbourhood Centre Zone

The proposed development is not consistent with the intent of NCZ-O3 and NCZ-P8. While these relate to the interface between NCZ and other zones, a park is proposed to be located within the NCZ which would require consent. The interface between the proposed commercial lot and the park reserve land has not been considered in the application, with no conditions proposed to manage the interface.

8.3.7.4 DEV - NG - Northern Growth Development Area

The proposed development is contrary to DEV-NG-O3 relating to the provision of infrastructure, DEV-NG-P1 relating to use and development, DEV-NG-P2 relating to subdivision, and DEV-NG-P3 and DEV-NG-P4 relating to the appropriateness of development. The proposal is not fully consistent with objective DEV-NG-O2 and is contrary to some specific clauses. Overall, the proposed development is contrary to the DEV - NG - Northern Growth Development Area chapter as a whole.

8.4 Summary

Overall, the proposed development is variously consistent with, inconsistent with, and contrary to, the objectives and policies of relevant RMA planning documents, with inconsistencies primarily relating to infrastructure provision, significant natural areas, and the achievement of a well-functioning urban environment. Of most relevance, the proposal is overall contrary to the DEV - NG - NGDA chapter in the PDP.

9 Conclusion

Porirua City has undertaken previous planning processes to enable appropriate development in the locality of the Mt Welcome site. This included introducing a specific NGDA chapter and associated Structure Plan into the Porirua District Plan.

I have reviewed the relevant information provided with the fast-track consent application for the Mt Welcome project. My review has been informed by other reviews undertaken by Porirua City technical staff and external consultants.

Overall, I consider that the information provided contains gaps and in places is not appropriately backed by technical assessments. In particular, based on the draft comments provided by Tiaki Wai, I consider the proposed three waters infrastructure is insufficient.

In my view, the proposal is inconsistent with a range of relevant objectives and policies of national policy statements, the Regional Policy Statement and the Porirua District Plan. In particular, the proposal contrary to the DEV - NG - Northern Growth Development Area chapter in the PDP.

There are range of matters where further assessment or provision of information should be required or additional or amended conditions included to ensure the effects of the proposed development will be acceptable and for the high-quality outcomes necessary for the development to be sustainable to be achieved, particularly given its context within the catchment of Te Awarua o Porirua. This is also necessary to ensure the outcomes sought in the Porirua District Plan are also achieved, particularly in relation to contributing to a well-functioning urban environment.

Appendix A. Objectives and Policies Assessment Comments

National Policy Statements

National Policy Statement on Urban Development

Provision	Comments
Objectives Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The proposal is not fully consistent with this objective. This is because of the proposal's inconsistencies with the Northern Growth Development Area Structure Plan. The Northern Growth Development Area chapter of the PDP and the associated Structure Plan were specifically developed to give effect to the NPS-UD, including this objective. The assessment of the NPSUD Objective 1 in the section 32 report for Variation 1 Part B Northern Growth Development Area stated: <i>The requirements of a well-functioning urban environment have been considered in detail through technical reports prepared in support of the Proposal, and will be achieved through a Structure Plan and associated Development Area provisions in the PDP.¹⁷</i> This is reflected in the wording of clause 1 of objective DEV-NG-O2 of the PDP <i>Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:</i> <i>1. A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan;</i> <i>[...]</i> The significant departures from the Structure Plan proposed by the applicant for the development compromise the achievement of a well-functioning urban environment within the Northern Growth Development Area. These departures are assessed in relation to Policy 1 below. Additionally, the lack of roading connections to the southern boundary will compromise the ability to achieve a well-functioning urban environment within the wider Northern Growth Area, as this will significantly limit the potential for future north-south transport connectivity within the area.

¹⁷ Section 32 Evaluation Report – Variation 1 Part B – Northern Growth Development Area, Appendix C. Evaluation of NPS-UD provisions.

Provision	Comments
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The proposal will in general terms, assist to achieve this objective, as it will support a competitive land and development market in Porirua and wider Wellington region. However, I note that the proposed consent notice restricting future development to one dwelling per allotment will limit the extent to which the proposed development will assist achieving this objective
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-served by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	This objective is not directly relevant to the proposal. It is noted that the PDP zoned the residential part of the site MRZ which enables a higher level of residential development than a General Residential Zone. This was done to give effect to the NPS-UD.
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The proposed development is inconsistent with this objective. The proposal includes limiting development of residential allotments via a consent notice to one dwelling per allotment and precluding any future subdivision. This will lock the development in, rather than enable the area to develop and change over time.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	Te Rūnanga o Toa Rangatira has been provided the opportunity to comment on the application. The views expressed in the comments from Te Rūnanga o Toa Rangatira are acknowledged.
Objective 6: Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.	The decision of the Council took these matters into account through the rezoning process. Specifically in relation to matter (a), the integration of the proposed development with infrastructure planning and funding decisions, the limitations of water supply and wastewater infrastructure were specifically considered through the rezoning process.
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	This objective is not directly relevant to the proposal.
Objective 8: New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.	While the proposal will generally assist to achieve clause (a) of this objective to some degree through its strategic location near an existing train station, the details of the proposal relating to the roading network and the associated provisions for future connections, pedestrian and cycling accessibility, and lack of public transport integration, act to undermine any potential reductions in greenhouse gas emissions by creating a car-dominated development. The proposal will generally assist to achieve clause (b) of this objective.
Policies	
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: (i) meet the needs, in terms of type, price, and location, of different households; and	The proposal will not meet clause (a) as a variety of homes will not be enabled. This is due to the proposed consent notice limiting development to one dwelling per allotment and precluding any further subdivision. This will limit the development of homes within the

Provision	Comments
(ii) enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.	site to single detached houses, which is already well provided for within Pukerua and Porirua more broadly. In turn, this may not meet the needs of different households in terms of type and price. In relation to clause (b), no substantive information is provided on the proposed neighbourhood centre as only a 'superlot' is proposed with any development to occur through future processes. Therefore, while the site may in the future, the proposal itself does not contribute to a variety of sites that are suitable for different business sectors. In relation to clause (c), the site has good access to jobs, community services, natural spaces, and open spaces for users of private vehicles via SH59. However, while the site of the proposed development is strategically located near to the Pukerua Bay train station, access to the train station will rely on private vehicle access via SH59. Because there is no active transport connection across SH59 to the Ara Harakeke pathway proposed, access by active transport to Pukerua Bay, the train station, and Porirua more broadly, will be dependent on the development of the Muri Block to the north. Additionally, no specific provision for public transport has been included in the proposed development. As such, the development, as proposed, does not meet the requirement for good accessibility for all people, and therefore it is not consistent with clause (c). The proposal would support the competitive operation of land and development markets within Porirua and Wellington region more broadly. As such, it meets clause (d). As noted above, the site of the proposed development is strategically located near to the Pukerua Bay train station, but access to the train station will rely on private vehicle access via SH59. The design of the proposal relating to the roading network and the associated provisions for future connections, pedestrian and cycling accessibility, and lack of public transport integration, act to undermine any potential reductions in greenhouse gas emissions by creating a car-dominated development. As such, the proposal has the potential to contribute to reductions in greenhouse gas emissions consistent with clause (e), but this is unlikely to be realised through the proposed development. The proposed development has considered the effects of climate change in relation to flooding. The site is not subject to coastal hazards. The proposal is generally consistent with clause (f). As such, overall, the proposal would partially contribute to a well-functioning urban

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	environment, primarily through supporting the competitive operation of land and development markets and being resilient to the likely current and future effects of climate change.
Policy 2: Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.	This policy is not directly relevant to the proposal.
Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable: (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and (b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and (c) building heights of at least 6 storeys within at least a walkable catchment of the following: (i) existing and planned rapid transit stops (ii) the edge of city centre zones (iii) the edge of metropolitan centre zones; and (d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.	This policy is not directly relevant to the proposal. I note that site includes an area of NCZ. The surrounding MRZ enables medium density residential development, consistent with clause (d).
Policy 4: Regional policy statements and district plans applying to tier 1 urban environments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.	This policy is not directly relevant to the proposal.
Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of: (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (b) relative demand for housing and business use in that location.	This policy is not directly relevant to the proposal.
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and (ii) are not, of themselves, an adverse effect (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity (e) the likely current and future effects of climate change.	This policy sets out matters that decision makers need to give particular regard to when making decisions. Comments on these matters are set out below. In relation to clauses (a) and (b), the planned urban built form anticipated by the PDP is set out in the Northern Growth Development Area chapter and the associated Structure Plan. The proposed development is not fully consistent with the planned urban built form anticipated by the PDP as there are significant departures from the Structure Plan. In relation to clause (c), the proposed development will have benefits that are consistent with well-functioning urban environments, primarily around supporting the competitive operation of land and development markets within Porirua. In relation to clause (d), the proposal does not contribute to providing or realising development capacity, as defined in the NPS-UD, as this has already been achieved through the Variation 1 process that rezoned

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	the site. The proposal limits the development capacity of the site, by proposing a consent notice limiting development to one dwelling per allotment whereas the zoning provides for 3 dwellings per site. In relation to clause (e), the proposed development has taken into account the likely current and future effects of climate change in relation to potential flood effects.
Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.	This policy is not directly relevant to the proposal.
Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.	This policy is not directly relevant to the proposal.
Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must: (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and (d) operate in a way that is consistent with iwi participation legislation.	Clause (c) of this policy will need to be considered by the Panel in relation to the proposed development.
Policy 10: Tier 1, 2, and 3 local authorities: (a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and (b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and (c) engage with the development sector to identify significant opportunities for urban development.	This policy is not directly relevant to the proposal. I note that Porirua City worked directly with the landowners to rezone the site through Variation 1 to the Proposed Porirua District Plan.
Policy 11: In relation to car parking: (a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and (b) Tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.	This policy is not directly relevant to the proposal.

National Policy Statement for Infrastructure 2025

Provision	Comments
1 Interpretation	
additional infrastructure includes: - a relevant school or institution as defined in the Education and Training Act 2020; - a health facility operated by Health New Zealand to meet its obligations under the Pae Ora (Healthy Futures) Act 2022; - fire and emergency services facilities; - defence facilities operated by the New Zealand Defence Force to meet its obligations under the Defence Act 1990; - correction facilities operated by the Department of Corrections to meet its obligations under the Corrections Act 2004;	The definition of infrastructure in the NPS include 'additional infrastructure'. In the context of the proposal this clarifies that a 'stormwater network' is infrastructure, whereas the RMA definition referred to 'a drainage or sewerage system'. In practice this has relatively little effect, as the RPS for the Wellington Region included 'the local authority wastewater and stormwater networks, systems and wastewater treatment

Provision	Comments
f. a stormwater network; g. resource recovery or waste disposal facilities; and h. flood control and protection works carried out by, or on behalf, of a local authority. infrastructure includes all infrastructure as defined by the Act and additional infrastructure as defined in this National Policy Statement	<i>plants</i> in the definition of '<i>regionally significant infrastructure</i>'.
2.1 Objective	
The objective of this National Policy Statement is to: a. ensure the national, regional and local benefits of infrastructure are provided for; b. enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety; c. enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations; d. ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and e. ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.	The proposal includes the extension of existing infrastructure networks and upgrades to existing infrastructure. The proposed infrastructure is to enable the proposed residential and commercial subdivision within a rural environment as it changes to an urban environment consistent with the underlying zoning, that will have regional and local benefits and will support the social, economic and cultural wellbeing of people and communities and their health and safety, consistent with clauses (a), (b) and (c). There are concerns that the proposed infrastructure, particularly the three waters infrastructure, will not be well-functioning, will not be delivered in a timely and efficient manner, or appropriately manage effects on existing infrastructure, and so will not be fully consistent with clauses (d) or (e).
2.2 Policies	
Policy 1: Providing for the benefits of infrastructure 1. Decision-makers must ensure that the national, regional or local benefits of infrastructure, relative to any localised adverse effects on the environment, are recognised and provided for. 2. Decision-makers must recognise that the benefits of infrastructure include: a. providing for the social, cultural and economic wellbeing of present and future generations; b. creating, supporting and enhancing well-functioning urban and rural environments; c. supporting sufficient development capacity to meet demand for housing and business land; d. providing services that are essential to support human life and the development, growth and functioning of districts, regions, New Zealand and the economy; e. helping to protect and restore the natural environment; f. supporting New Zealand's emissions reduction targets and mitigating the effects of climate change; and g. reducing the risks from, and improving resilience to, natural hazards and climate change. 3. Decision-makers must recognise: a. the significant risks to, and impacts on, public safety, the wellbeing of people and communities, and the environment that may occur when infrastructure services are compromised; and b. that infrastructure networks can be both independent and interconnected.	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. However, comments are provided below for completeness. In relation to clause 1, the proposed infrastructure will support development of an urban zoned site that will have regional and local benefits. The development of the site could potentially have benefits relating to those listed in clause 2(a), (b), (c), and (d). In relation to clause 3, the proposed infrastructure also has the potential to result in compromising infrastructure services, including the water supply and wastewater networks, if appropriate conditions are not imposed.
Policy 2: Operational need or functional need of infrastructure to be in particular locations and environments 1. Decision-makers must recognise that infrastructure may have an operational need or functional need to operate in, be located in, or traverse particular locations and environments.	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. However, comments are provided below for completeness.

Provision	Comments
2. Decision-makers must recognise that the operational need or functional need of infrastructure includes, but is not limited to, the need to: a. provide services to people and communities in a timely, effective and efficient manner; b. operate effectively and efficiently as linear and/or interconnected infrastructure networks within and across district and regional boundaries; c. access or connect to particular natural or physical resources, including other infrastructure; d. be accessible so infrastructure activities can be undertaken effectively and efficiently; e. locate where the services are required, including in areas at risk to natural hazards, whether the infrastructure has been spatially identified in advance; and f. manage risks from natural hazards.	In relation to clauses 1 and 2, the proposed infrastructure may have operational needs or functional needs to be in particular locations and environments. However, this is not demonstrated in the application. This policy is particularly relevant to the infrastructure for which policies in the PDP refer to a requirement for operational or functional need to be demonstrated, including INF-P21 which relates to the proposed SH59 intersection locating within SNA027 and SNA029.
Policy 3: Considering spatial planning 3. Decision-makers must: a. have regard to the extent to which the infrastructure has been identified within a strategic planning document, while recognising that not all infrastructure can be spatially identified in advance; and b. consider relevant spatial plans and master plans prepared by the infrastructure provider and provided to the decision-maker.	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. However, comments are provided below for completeness. The Wairarapa-Wellington-Horowhenua Future Development Strategy (FDS) was approved 19 March 2024 by the Wellington Regional Leadership Committee. The FDS includes identifying on Diagram 19 (Infrastructure projects identified in Long Term Plans/Infrastructure Plans) 'Wastewater pipe and pump station renewals and improvements' but does not specify where or when these would occur.
Policy 4: Enabling the efficient and timely operation and delivery of infrastructure activities 1. Decision-makers must: a. enable the efficient and timely delivery of infrastructure activities; b. enable cross-boundary infrastructure networks; c. provide flexibility for infrastructure providers to use new or innovative technologies and methods to improve the delivery of infrastructure services and/or improve environmental outcomes; d. enable opportunities to make more effective use of existing infrastructure; e. consider opportunities for continuous improvement in service delivery and environmental outcomes when renewing or replacing resource consents; and f. enable the upgrading of infrastructure where this will: i. improve the resilience of infrastructure to the risks from natural hazards and effects of climate change; ii. maintain or improve its level of infrastructure service, including to meet increasing demand; or iii. improve environmental outcomes. 2. Decision-makers must: a. recognise it is the role of the infrastructure provider to identify the preferred location for the infrastructure activity; and b. have regard to existing information and assessments undertaken by the infrastructure provider, including, but not limited to, information prepared using the Better Business Cases methodology developed by The Treasury New Zealand, infrastructure strategies prepared under the Local Government Act 2002, or	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. However, comments are provided below for completeness. Clause 1(b), (c) and (e) and clause 2 are not relevant, as the applicant is not an infrastructure provider and the proposal is not for renewing or replacing resource consents or cross-boundary infrastructure networks. In relation to clause 1(a), the conditions of consent could enable the efficient and timely delivery of the infrastructure activities for which consents are sought as under section 83 of the FTAA these are required to be no more onerous than necessary to address the reason for which they are set. However, I note that the proposed infrastructure itself is insufficient for the proposed development. In relation to clause 1(d) and (f), the Applicant is seeking to upgrade the existing bulk wastewater pipe in SH59 in conjunction with onsite storage to enable effective use of that existing infrastructure and may improve its level of infrastructure service, including meeting increasing demand. Under these clauses, that must be enabled.

Provision	Comments
the Infrastructure Priorities Programme developed by New Zealand Infrastructure Commission Te Waihanga.	
Policy 5: Recognising and providing for infrastructure supporting activities 3. Decision-makers must recognise and provide for the role of infrastructure supporting activities, including by: - recognising the importance of infrastructure supporting activities to enable the benefits of infrastructure activities to be realised; - recognising the operational need or functional need of some infrastructure supporting activities, including supporting quarrying activities to operate in, be located in, or traverse particular environments and locations; and - enabling the timely delivery of infrastructure supporting activities.	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. Additionally, there are no infrastructure supporting activities proposed as part of the project. As such, this policy is not directly relevant.
Policy 6: Recognising and providing for Māori interests 1. Decision-makers must recognise and provide for Māori interests in relation to infrastructure activities and infrastructure supporting activities, including by: - taking into account the outcome of any engagement with tangata whenua on any relevant resource consent, notice of requirement, or request for a private plan change; - recognising the opportunities tangata whenua may have in developing and operating their own infrastructure at any scale or in partnership; and - local authorities: - providing opportunities for tangata whenua involvement where infrastructure and infrastructure supporting activities may affect a site of significance or issue of cultural significance to Māori; and - operating in a way that is consistent with any relevant iwi participation legislation or Mana Whakahono ā Rohe.	The expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. I consider that only mana whenua are able to comment on the potential cultural impacts. I note that the application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor.
Policy 7: Assessing and managing the effects of proposed infrastructure activities 1. When assessing and managing the effects of infrastructure activities, decision-makers must: - have regard to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work; - consider the technical and operational requirements and constraints of infrastructure activities; - take into account the extent to which the effects of the infrastructure activities are different in scale, intensity, duration and frequency from the effects of existing infrastructure; - take into account relevant international standards (that are recognised or used in New Zealand), national standards and recognised best practice standards and methodologies to assess and manage adverse effects; and - ensure that the mitigation measures and consent conditions are proportionate to the scale of adverse effects generated by the activity.	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. However, comments are provided below for completeness. In relation to clause (a), for some of the new infrastructure and upgrades to existing infrastructure, the application does not provide sufficient information to enable regard to be had to the extent to which adverse effects have been avoided, remedied or mitigated through the selection of the route, site or method of undertaking the work, particularly the proposed methodology for construction of the infrastructure. This includes the upgrades to bulk wastewater main and the new water main in SH59, and the intersection with SH59. In relation to (e), the issues with lack of information referred to above also relate to this clause, as the scale of the adverse effects are not known it is difficult to ensure that the mitigation measures and consent conditions are proportionate.
Policy 8: Operation, maintenance and minor upgrade of existing infrastructure	This policy is not directly relevant to the proposed development as it relates to the

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1. Decision-makers must enable the efficient operation and maintenance and minor upgrade of existing infrastructure, provided that, where practicable, adverse effects are avoided, remedied or mitigated.	operation, maintenance and minor upgrade of existing infrastructure but will become relevant upon vesting of any infrastructure assets.
Policy 9: Managing the effects of new infrastructure and major upgrades 1. Decision-makers must enable new infrastructure or major upgrades of existing infrastructure activities in all environments. 2. Where infrastructure activities are proposed to locate in or are likely to have adverse effects on environments and values provided for in section 6 of the Act, the provisions of this policy must be read alongside other relevant national direction, regional policy statements and regional and district plans. 3. Where (2) does not apply, the adverse effects of new infrastructure and major upgrades must be, where practicable, avoided, remedied or mitigated.	As this policy provides direction to decision-makers, the proposal itself cannot be consistent or inconsistent with it. However, comments are provided below for completeness. This policy relates to all new infrastructure within the Mt Welcome site and within SH59, as well as the intersection upgrade to SH59 and the upgrades to the bulk wastewater main. Clause (2) applies to the intersection upgrade to SH59, as it will occur within a significant natural area (SNA027) and will impact on Taupō Stream, and the upgrades to the bulk wastewater main as part of the upgrades are within an outstanding natural feature or landscape (ONFL002). It also applies to any proposed infrastructure within a flood hazard area, including the proposed water main in SH59. The relevant provisions of other relevant national direction, regional policy statements and the PDP are assessed in other tables of this appendix. All other proposed infrastructure will fall under clause 3. The information provided on the proposed infrastructure and upgrades to existing infrastructure does not adequately demonstrate that the adverse effects will be avoided, remedied or mitigated where practicable.
Policy 10: Planning for and managing the interface and compatibility of infrastructure with other activities Policy 11: Assessing and managing the interface between infrastructure and other activities	These policies are not directly relevant as they refer to 'planning instruments'. While not defined in the NPS-I, these are defined in the RMA in relation to the streamlined planning process as, generally, a policy statement or plan (or a change or variation to those documents).

National Policy Statement for Natural Hazards 2025

Provision	Comments
2.1 Objective Natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach.	The natural hazards provisions of the PDP implement a risk-based approach to the management of natural hazards within Porirua. As such, implementation of the PDP provisions would be consistent with this objective.
2.2 Policies Policy 1: When considering natural hazard risk associated with subdivision, use or development, the risk level must be assessed using the risk matrix.	The assessment of the natural hazard matrix appears to have been completed by the project planner in Appendix 5, rather than an engineering or natural hazards professional within the relevant technical reports. In any case, there appears to be errors in this assessment. The assessment correctly identifies that the NPS requires that:

	2. When assessing natural hazard risk, decision-makers must consider: a. existing and proposed mitigation measures; and b. residual risk that arises when design thresholds of any existing and proposed mitigation measures are exceeded. In relation to this, the assessment states that: <i>Envelope has undertaken post-development modelling that demonstrates that flood hazard risk to future buildings and residential allotments is low, with all three flood hazards confined to roading and local purpose reserves with appropriately sized stormwater infrastructure. As such the residual risk from all three flood hazards is considered to be very low. [emphasis added]</i> The statement that all three flood hazards are confined to roading and local purpose reserves is incorrect. The flood modelling maps for the blocked scenario, which relates to the residual risk when design thresholds are exceeded, shows that flooding would occur within a number of the proposed residential allotments. As such, while the depth of the resulting flooding is difficult to determine based on the maps, the residual risk is likely to be higher than 'very low' as stated in the assessment. In relation to geological hazards, while the assessment in Appendix 5 appears to have had input from the geotechnical professionals for the project, it is not clear how the matrix has been applied to these hazards. The likelihood of the hazards is stated as 'possible'. To achieve a 'low' risk as stated in the assessment, the consequences would need to be 'negligible'. A negligible consequence is described in the NPS-NH as "No loss of use, no building repairs required. No injuries." This may be the case; however, it is not clear that this is the case from the Geotechnical Investigation or the NPS-NH assessment.
Policy 2: Natural hazard risk associated with subdivision, use and development must be managed using an approach that is proportionate to the level of natural hazard risk.	The comments from Tiaki Wai in relation to the natural hazard risk relating to flooding are relied on and deferred to. In relation to geological hazards, Porirua City commissioned a geotechnical review of the application from Tonkin and Taylor. This has identified that the risks can largely be addressed through conditions of consent. However, in relation to liquefaction and seismic hazards, there remains an outstanding issue that cannot be addressed through conditions relating to liquefaction

	potential within the low-lying gully and the post-seismic stability of the embankment constructed from unsuitable material.
Policy 3: Where subdivision, use or development is assessed as having very high natural hazard risk, that risk must be avoided.	It is unlikely that there are any natural hazard risks that are very high.
Policy 4: Where subdivision, use or development, including any associated mitigation measures, will create or increase significant natural hazard risk on other sites, that risk must be avoided or mitigated using an approach that is proportionate to the level of natural hazard risk.	The draft comments from Tiaki that I have reviewed identify that there may be adverse flooding effects downstream of Taupō Swamp as a result of the stormwater discharges from the site and that this requires further modelling to be undertaken. As such, these effects would need to be assessed and avoided or mitigated in accordance with this policy.
Policy 5: Natural hazard risk assessment and decisions must be based on the best available information and must be made even when that information is uncertain or incomplete.	The draft comments from Tiaki Wai that I have reviewed identify that there may be adverse flooding effects downstream of Taupō Swamp as a result of the stormwater discharges from the site and that this requires further modelling to be undertaken. This policy relates to section 3.4 of the NPS which states that <i>When information is uncertain or incomplete, decision-makers must continue to undertake risk assessments and make decisions using the best available information and not delay making decisions solely because of uncertainty about the quality or quantity of the information available.</i> As such, even if the Applicant does not provide that additional information, a decision would need to be made on the application. In relation to geological hazards, Porirua City commissioned a geotechnical review of the application from Tonkin and Taylor. This identified that the risks can largely be addressed through conditions of consent. However, in relation to liquefaction and seismic hazards, there remains an outstanding issue that cannot be addressed through conditions relating to liquefaction potential within the low-lying gully and the post-seismic stability of the embankment constructed from unsuitable material.
Policy 6: The potential impacts of climate change to at least 100 years into the future must be considered.	The climate change allowance in the flood modelling was to increase rainfall depths by 20%. This is consistent with this policy. However, the Geotechnical Investigation report does not mention climate change. While the application states that “<i>Slope stability [sic] assessments in the Geotechnical Investigation (Appendix 26) consider rainfall induced saturation effects expected to increase with climate change.</i>” this has not been able to be verified. As such, it is not clear whether there has been any consideration of the potential impacts of climate change in relation to geological hazards.

National Policy Statement for Indigenous Biodiversity

Provision	Comments
2.1 Objective	
1. The objective of this National Policy Statement is: - to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and - to achieve this: - through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and - by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and - by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and - while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.	The proposal is not consistent with this objective, as the proposed intersection includes loss of an area of SNA029 without any avoidance, remedy or mitigation proposed.
2.2 Policies	
Policy 1: Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.	Written comments on the application have also been sought from Te Rūnanga o Toa Rangatira. The expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. Only mana whenua are able to comment on the potential cultural impacts.
Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: - managing indigenous biodiversity on their land; and - identifying and protecting indigenous species, populations and ecosystems that are taonga; and - actively participating in other decision-making about indigenous biodiversity.	
Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	
Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.	Based on the review provided by Wildlands on behalf of Porirua City, the proposal has not taken a precautionary approach when considering adverse effects on indigenous biodiversity. This is demonstrated by the disregarding of adverse effect generated by the removal of an area of SNA029 within the road corridor, as discussed in the main body of these comments.
Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	This policy is not directly relevant to the proposal. However, the inclusion of buffer areas on the site around SNAs may assist to give effect to this policy.
Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.	This policy is not directly relevant to the proposal.
Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	The proposal is not fully consistent with this policy, as the Applicant has not proposed any avoidance or management of adverse effects of removal of an area of SNA029.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	Based on the review of the Ecological Assessment provided by Wildlands, there may be areas on the site outside of SNAs that support indigenous biodiversity, the loss of which is not mitigated. Therefore, the proposal is not consistent with this policy.
Policy 9: Certain established activities are provided for within and outside SNAs.	This policy is not directly relevant to the proposal.
Policy 10: Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	The proposed provision of vacant allotments for housing will contribute to the social and economic wellbeing of the people and

Provision	Comments
	communities of Porirua and the wider Wellington region.
Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.	This policy is not directly relevant to the proposal.
Policy 12: Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.	This policy is not directly relevant to the proposal.
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	This policy is given effect to through the PDP
Policy 14: Increased indigenous vegetation cover is promoted in both urban and non-urban environments.	The proposal is generally consistent with this objective, as increased indigenous vegetation cover is promoted with the areas proposed to be vested to Porirua City.
Policy 15: Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	Based on the review of the Ecological Assessment provided by Wildlands, there may be areas on the site outside of SNAs that support specified highly mobile fauna and the loss of which is not mitigated. Therefore, the proposal is not consistent with this policy.
Policy 16: Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.	This policy is not directly relevant to the proposal.
Policy 17: There is improved information and regular monitoring of indigenous biodiversity.	This policy is not directly relevant to the proposal.

Regional Policy Statement

Objectives and consideration policies

O = Operative

NYO = Not yet operative

A = Under appeal

Provision	Comments
Integrated Management	
NYO <u>Integrated Management Objective A:</u> <u>Integrated management of the region's natural and physical resources:</u> <u>a) is guided by Te Ao Māori; and</u> <u>b) incorporates mātauranga Māori in partnership with mana whenua / tangata whenua; and</u> <u>c) recognises and provides for ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment; and</u> <u>d) recognises and provides for the relationship of mana whenua / tangata whenua with te taiao and protects and enhances mana whenua / tangata whenua values, in particular mahinga kai; and e) is informed by the input of communities; and</u> <u>e) is informed by the input of communities; and</u> <u>f) protects and enhances the life-supporting capacity of ecosystems; and</u> <u>g) recognises the dependence of humans on a healthy natural environment; and</u> <u>h) recognises the role of the resource management and planning system in reducing gross greenhouse gas emissions; and</u> <u>i) recognises the role of both natural and physical resources, including highly productive land and regionally significant infrastructure, in providing for well-functioning urban and rural areas and improving the resilience of communities to climate change; and</u> <u>j) recognises the benefits of protecting and utilising the region's significant mineral resources; and</u>	Overall, the proposal is not fully consistent with this objective. In relation to clauses (a), (b) and (d) the expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. Only mana whenua are able to comment on the relevance of Te Ao Māori or mātauranga Māori to the proposal. I note that the application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor. In relation to clauses (c), (f) and (g) based on the draft comments from Tiaki Wai that I have reviewed, the proposal is not consistent with this clause as the discharges of wastewater and stormwater from the site may lead to adverse effects on downstream environments. In relation to clause (e), Variation 1 to the PDP that rezoned the site was informed by community consultation. The application notes one community drop-in session held in Pukerua Bay. In relation to clause (i), the proposal includes regionally significant infrastructure to

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k) <u>responds effectively to the current and future effects of climate change, population growth, and development pressures and opportunities.</u>	contribute to a well-functioning urban environment. Clauses (h) and (j) are not relevant. In relation to clause (k), the proposal responds to population growth and development pressures and opportunities in Porirua.
O Policy IM.1: Integrated management - ki uta ki tai – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, local authorities shall adopt an integrated approach to the management of the region's natural and physical resources, including by: a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua involvement in resource management and decision making; and b) recognising the interconnectedness between air, freshwater, land, coastal marine areas, ecosystems and all living things – ki uta ki tai; and c) recognising that the effects of activities may extend beyond immediate and directly adjacent area, and beyond organisational or administrative boundaries; and d) recognising the interrelationship between natural and physical resources; and e) making decisions based on the best available information, improvements in f) technology, science, and mātauranga Māori; and g) requiring Māori data and mātauranga Māori to be interpreted within Te Ao Māori while upholding Māori data sovereignty.	Technically, this policy is not directly relevant as the local authorities are not considering the application for a resource consent. However, for completeness, comments are made on the clauses of the policy. In relation to clause (a) and (g), the expression of the rights and interests of Te Rūnanga in relation to the proposal is acknowledged. Only mana whenua are able to comment on the potential cultural impacts. In relation to clauses (b), (c) and (d), the application does not sufficiently recognise the potential adverse effects of the development on the surrounding environment, including on downstream environments including Te Awarua o Porirua. In relation to clauses (e) and (f) (which are read together), consideration of mātauranga Māori will need to be informed by any comments provided by Te Rūnanga.
Climate Change	
NYO <u>Objective CC.1</u> <u>The Wellington Region is a low-emission and climate resilient region, where climate change mitigation and climate change adaptation are an integral part of:</u> <u>a) sustainable air, land, freshwater, and coastal management; and</u> <u>b) well-functioning urban areas and rural areas; and</u> <u>c) the planning and delivery of infrastructure (including regionally significant infrastructure).</u>	The proposal is not fully consistent with this objective. Climate change mitigation and climate change adaptation are not a part of the proposal, and are not an integral part of the development of the site as contributing to a well-functioning urban area, In relation to clause (c), the proposed stormwater system has taken account of the effects of climate change on future rainfall intensity.
A <u>Objective CC.2</u> <u>The costs and benefits of transitioning to a low-emission and climate-resilient region are equitable between sectors and communities.</u>	This objective is not relevant to the proposal.
A <u>Objective CC.3</u> <u>To support the global goal of limiting warming to 1.5 degrees Celsius and New Zealand's greenhouse gas emissions reduction targets, net greenhouse gas emissions in the Wellington Region are reduced:</u> <u>a) to contribute to a 50 percent reduction in net greenhouse gas emissions from 2019 levels by 2030; and</u> <u>b) to contribute to achieving net-zero greenhouse gas emissions by 2050.</u>	This objective is not relevant to the proposal.
A <u>Policy CC.9: Reducing greenhouse gas emissions associated with subdivision, use, or development – consideration</u> <u>When considering an application for a resource consent, notice of requirement, or a change, variation or review of a regional or district plan, particular regard shall be given to whether the subdivision, use or development has been planned in a way that contributes to reducing greenhouse gas emissions by optimising overall transport demand, by</u>	The proposal is inconsistent with this policy, as the proposed urban form does not maximise mode shift from private vehicles to public transport or active modes, or support low and zero-carbon modes. One transport connection to the wider transport network is proposed, with no provision for active or public transport modes proposed, so that the only transport option to access the

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	<u>maximising mode shift from private vehicles to public transport or active modes, and supporting low and zero-carbon modes.</u>	development is private vehicle. The internal roading network is predominantly cul-de-sacs, with future transport connections actively precluded. No public transport infrastructure is proposed within the development. Many local roads have footpaths only on one side. Many JOALs have no separated provision for pedestrians.
A	<u>Policy CC.11: Encouraging whole of life greenhouse gas emissions assessment for transport infrastructure - consideration</u> <u>Encourage whole of life greenhouse gas emissions assessments to be provided with resource consent applications to Wellington Regional Council and resource consent applications and notices of requirement to city and district councils for all new or upgraded land transport infrastructure. This information will assist with evaluating the potential greenhouse gas emissions, options for reducing direct and indirect greenhouse gas emissions and whether the infrastructure has been designed and will operate in a manner that contributes to reducing transport-related greenhouse gas emissions in the Wellington Region.</u>	The proposal includes both new and upgraded land transport infrastructure. No whole-of-life greenhouse gas emission assessment has been provided. However, as the wording of the policy is to 'encourage', the lack of an assessment does not result in inconsistency with the policy.
O	<u>Policy CC.14: Climate responsive development – district and city council - consideration</u> When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, require that development and infrastructure is located, designed and constructed in ways that provide for climate change mitigation, climate change adaptation and climate-resilience prioritising the use of nature-based solutions and informed by mātauranga Māori. This includes as appropriate to the scale and context of the activity: a) providing urban green space, particularly canopy trees, to reduce urban heat and reduce stormwater flowrates: (i) prioritising the use of appropriate indigenous species, and (ii) contributing to achieving a wider target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050; and b) methods to increase water resilience, including by requiring harvesting of water at a domestic and/or community-scale for non-potable uses (for example by requiring rain tanks, rainwater re-use tanks, and setting targets for urban roof area rainwater collection); and c) avoiding significant adverse effects on the climate change mitigation, climate change adaptation and climate-resilience functions and values of an ecosystem, and avoiding, minimising, or remedying other adverse effects on these functions and values; and d) promoting efficient use of water and energy in buildings and infrastructure; and e) promoting appropriate design of buildings and infrastructure so they are able to withstand the predicted future higher temperatures, intensity and duration of rainfall and wind over their anticipated life span.	The proposal is not fully consistent with this policy. In relation to clause (a), greenspace is provided within the development, with indigenous planting proposed. In relation to clause (b) and (d), the proposal is considered to be inconsistent, as the application considers but dismisses rainwater harvesting as an option. In relation to clause (c), the proposal includes the removal of SNA and the piping of part of Taupō Stream. The Ecological Assessment provided with the application does not address any climate change mitigation, adaptation or resilience functions or values of the associated ecosystem. As such, the proposal is not fully consistent with this clause. (e) is outside of the scope of the application, and resource management generally as the design of buildings to withstand heat, wind and rain is addressed by the Building Act.
Energy, Infrastructure and Waste		
O	<u>Objective 9</u> The region's energy needs are met in ways that: a) improve energy efficiency and conservation; b) diversify the type and scale of renewable energy development; c) maximise the use of renewable energy resources; d) reduce dependency on fossil fuels; and e) reduce greenhouse gas emissions from transportation.	These provisions are not assessed in the application. The proposal is not fully consistent with these provisions. In relation to objective 9, while the site is strategically located near to an existing train

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A	Policy 39: Recognising the benefits from renewable energy and regionally significant infrastructure – consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, particular regard shall be given to: a) <u>recognise and provide for the social, economic, cultural, and environmental benefits of energy generated from renewable energy resources and its transmission through the electricity transmission network;</u> and b) <u>recognise the social, economic, cultural, and environmental benefits of other and/or regionally significant infrastructure, including where it contributes to reducing greenhouse gas emissions and provides for climate change mitigation, climate change adaptation and climate-resilience;</u> and c) <u>have particular regard to protecting regionally significant infrastructure from incompatible subdivision, use and development occurring under, over, or adjacent to the infrastructure;</u> and d) <u>recognise and provide for the operational need and functional the need for renewable electricity generation activities to be in particular locations, including the need facilities to locate where the renewable energy resources exist;</u> and e) <u>recognise the benefits of utilising the significant wind, solar, and marine renewable energy resources within the Wellington Region and the development of the electricity transmission network to connect the renewable energy resource to distribution networks and end-users.</u>	station, the proposal does not include any ability to access the development other than by private car. As such, it will not contribute to a reduction in dependency on fossil fuels or greenhouse gas emissions from transportation until such time that active and public transport connections to the wider transport network are provided. In relation to Policy 39(b) and (c) the recognition and protection of regionally significant infrastructure is achieved through the PDP provisions.
Freshwater		
O	Objective 14 Fresh water available for use and development is allocated and used efficiently.	These provisions are not assessed in the application.
O	Policy 45: Using water efficiently – consideration When considering an application for a resource consent, or a change, variation or review of a district plan, particular regard shall be given to requiring water collection, water demand management options, and water reuse and/or water recycling measures, so that water is used efficiently.	The proposal is inconsistent with these provisions as, while rainwater harvesting is considered in relation to reducing stormwater discharges, the application does not consider rainwater harvesting in relation to water use efficiency, or proposed to incorporate any other water use efficiency measures.
Indigenous Ecosystems		
NYO	Objective 16 Indigenous ecosystems and habitats with significant indigenous biodiversity values, <u>other significant habitats of indigenous fauna, and the ecosystem processes that support these ecosystems and habitats, are maintained protected and, where appropriate, enhanced and</u> restored to a healthy functioning state.	Significant Natural Areas are identified in the PDP. The NGDA includes requirements for SNA buffers and corridors in accordance with clauses (a) and (b) of Policy 47. SNAs are identified on the site and within the adjacent SH59 road corridor. The proposal includes buffers and planting to comply with those requirements.
A	Policy 47: Managing effects on indigenous ecosystems and habitats with significant indigenous biodiversity values and other significant habitat of indigenous fauna – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may affect indigenous ecosystems and habitats with significant indigenous biodiversity values, <u>other significant habitats of indigenous fauna, and the ecosystem processes that support these ecosystems and habitats,</u> and in determining whether the proposed activity is inappropriate particular regard shall be given to: a) maintaining connections within, or corridors between, habitats of indigenous flora and fauna and/or enhancing	However, the proposal includes loss of areas of SNA027 and SNA029 within the adjacent SH59 road corridor (triggering clause (j) and policy 24D). While offsetting is proposed for the loss of SNA027, expert advice indicates that the calculation of the necessary area is insufficiently robust. No offsetting is proposed for the loss of SNA029. Additionally, it is not clear from the Ecological Assessment how the effects management hierarchy set out in ECO-P2 of the PDP has been applied in relation to the loss of SNA from the proposal.

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the connectivity between fragmented indigenous habitats; and b) providing adequate buffering around areas of significant indigenous ecosystems and habitats from other land uses; and c) managing <u>natural</u> wetlands for the purpose of aquatic ecosystem health, <u>recognising the wider benefits, such as for indigenous biodiversity, water quality and holding water in the landscape</u>; and d) avoiding the cumulative adverse effects of the incremental loss of indigenous ecosystems and habitats; and e) providing seasonal or core habitat for indigenous species; and f) protecting the life supporting capacity of indigenous ecosystems and habitats; and g) remediating or mitigating <u>minimising or remedying</u> adverse effects on the indigenous biodiversity values where avoiding adverse effects is not practicably achievable <u>except where Clause (i) and (j) apply</u>; and h) the need for a precautionary approach <u>to be adopted</u> when assessing and managing the potential for adverse effects on indigenous ecosystems and habitats, <u>where</u>: (i) <u>the effects on indigenous biodiversity are uncertain, unknown, or little understood</u>; and (ii) <u>those effects could cause significant or irreversible damage to indigenous biodiversity</u>; and i) <u>the provisions to protect significant biodiversity values in Policy 24B, and Policy 24C and the principles for biodiversity offsetting and biodiversity compensation in Policy 24A, except that Policy 24A and Policy 24B do not apply to REG activities and ET activities</u>; and j) <u>the provisions to manage the adverse effects of REG activities and ET activities on significant biodiversity values in Policy 24D</u>; and k) <u>protecting indigenous biodiversity values of significance to mana whenua / tangata whenua, including those associated with a significant site for mana whenua / tangata whenua identified in a regional or district plan</u>; and l) <u>enabling established activities affecting significant biodiversity values in the terrestrial environment to continue, where the effects of the activities</u>: (i) <u>are no greater in intensity, scale and character</u>; and (ii) <u>do not result in loss of extent, or degradation of ecological integrity, of any significant biodiversity values</u>; and m) <u>ensuring that the adverse effects of plantation forestry activities on significant indigenous biodiversity values in the terrestrial environment are managed in a way that</u>: (i) <u>maintains significant indigenous biodiversity values as far as practicable, while enabling plantation forestry activities to continue</u>; and (ii) <u>where significant biodiversity values are within an existing plantation forest, maintains the long-term populations of any Threatened or At Risk (declining) species present in the area over the course of consecutive rotations of production</u>.	As such, the proposal is inconsistent with these provisions.
NYO Objective 16A <u>The region's indigenous biodiversity is maintained and, where appropriate, enhanced and restored to a healthy functioning state, improving its resilience to increasing environmental pressures, particularly climate change.</u>	The proposal includes clearance of indigenous vegetation outside of the identified SNAs. This includes in relation to the proposed SH59 intersection. No

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A	<u>Policy IE.2A: Maintaining indigenous biodiversity in the terrestrial environment – consideration</u> <u>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan or regional plan, indigenous biodiversity in the terrestrial environment that does not have significant indigenous biodiversity values as identified under Policy 23 and is not on Māori land, shall be maintained by:</u> <u>a) avoiding, remedying or mitigating the adverse effects of REG activities and ET activities to the extent practicable; and</u> <u>b) managing any significant adverse effects on indigenous biodiversity from any other proposed activity by applying the effects management hierarchy; and</u> <u>c) managing all other adverse effects on indigenous biodiversity to achieve at least no overall loss in indigenous biodiversity within the Wellington Region or district as applicable.</u>	mitigation is proposed. As such, the proposal is inconsistent with this policy and objective.
NYO	<u>Objective 16B</u> <u>Mana whenua / tangata whenua values relating to indigenous biodiversity, particularly taonga species, and the important relationship between indigenous ecosystem health and well-being, are given effect to in decision-making, and mana whenua / tangata whenua are supported to exercise their kaitiakitanga for indigenous biodiversity.</u>	The expression of the rights and interests of Te Rūnanga in relation to the proposal is acknowledged. Only mana whenua are able to comment on the potential cultural impacts. I note that the application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor.
A	<u>Policy IE.2: Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – consideration</u> <u>When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan for subdivision, use or development that may impact on indigenous biodiversity, recognise and provide for mana whenua / tangata whenua values and relationships associated with indigenous biodiversity, including by, but not restricted to:</u> <u>a) giving effect to the decision-making principles for indigenous biodiversity and, once they are established, the local expressions of the decision-making principles for indigenous biodiversity developed through Method IE.1; and</u> <u>b) enabling mana whenua / tangata whenua to exercise their roles as kaitiaki; and</u> <u>c) incorporating the use of mātauranga Māori in the management and</u> <u>d) monitoring of indigenous biodiversity; and</u> <u>e) supporting mana whenua / tangata whenua to access and exercise sustainable customary use of indigenous biodiversity, including for mahinga kai and taonga, in accordance with tikanga.</u>	
Natural Hazards		
A	<u>Objective 19</u> <u>The risks and consequences to people, communities, their businesses, property, and infrastructure and the environment from natural hazards and the effects of climate change effects are reduced avoided or minimised.</u>	At a high level, the proposal is generally consistent with these provisions, as the potential for natural hazards on the site has been considered through technical assessments. Flooding within the site has been addressed through stormwater design that incorporates consideration of climate change and the geohazards on the site have been considered through the geotechnical investigation.
NYO	<u>Objective 20</u> <u>Natural hazard mitigation measures and climate change adaptation activities minimise the risks from natural hazards, and impacts on, Te Mana o te Wai, taonga species, sites of significance to mana whenua / tangata whenua, natural processes, indigenous ecosystems and biodiversity.</u>	However, liquefaction and landslides may be affected by climate change through raised

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	groundwater and increased rainfall. These do not appear to have been considered through the technical assessment of these natural hazards.
A	In relation to policy 51 clauses (d) and (e), the draft comments from Tiaki Wai indicate concern that the potential flooding effects from the development outside of the site may include increased flooding downstream of Taupō Swamp, as this has not been included in the modelling provided.
A	Policy 51: Avoiding or minimising the risks and consequences of natural hazards – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review to a district or regional plan, the risk and consequences of natural hazards on people, communities, their property and infrastructure shall be <u>avoided or minimised</u>, and/or in determining whether an activity is inappropriate particular regard shall be given to: a) the <u>frequency and magnitude likelihood and consequences</u> of the range of natural hazards that may adversely affect the <u>proposal or development subdivision, use or development</u>, including <u>residual risk</u> those that <u>may be exacerbated by climate change and sea level rise</u>; and b) the <u>potential for climate change and sea level rise to increase in the frequency or magnitude of a hazard event</u>; b) whether the location of the <u>subdivision, use or development</u> will foreseeably require hazard mitigation works in the future; and c) the potential for injury or loss of life, social <u>and economic</u> disruption and <u>civil defence</u> emergency management <u>and civil defence</u> implications – such as access routes to and from the site; and d) <u>whether the subdivision, use or development causes any change in the risks and consequences from natural hazards in areas beyond the application development site</u>; and e) <u>minimising effects the impact of the proposed subdivision, use or development on any natural features that may act as a buffer to reduce the impacts from natural hazards</u>; and <u>and where development should not interfere with their ability to reduce the risks of natural hazards</u>; f) avoiding <u>inappropriate subdivision, use or and development and hazard sensitive activities where the hazards and risks are assessed as high in areas at high risk from natural hazards</u>, unless there is a functional or operational need to be located in these areas; and g) <u>appropriate the potential need for hazard risk management and/or adaptation and mitigation measures for subdivision, use or development in moderate-risk areas where the hazards and risks are assessed as low to moderate, including an assessment of residual risk</u>; and h) <u>the allowance for floodwater conveyancing in identified overland flow paths and stream corridors</u>; and i) the need to locate <u>habitable floor areas and access routes</u> levels of habitable buildings and buildings used as <u>places of employment</u> above the <u>1% annual exceedance probability</u> (1:100 year) flood level, in identified flood hazard areas; and j) <u>whether Te Ao Māori or mātauranga Māori provides a broader understanding of the hazards and risk management options</u>. Technically, the proposal is contrary to clause (f) of Policy 51, as the development includes areas located in areas of 'high' natural hazard risk, being the mapped Flood Hazards - Stream Corridors in the PDP. That clause requires development in high hazard areas to be avoided. In relation to clause (b) of Policy 52, the Geotechnical Investigation states that: <i>Catch fences / barriers may be required at the bottom of cuts to protect structures or roads from rock fall loosened by fretting or erosion.</i> It is not clear that catch fences / barriers would be part of a hazard risk management strategy that represents the best practicable option for the future. As such, the use of such structures may be inconsistent with that clause. Therefore, there are aspects of the proposed development that are not fully consistent with these provisions.

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NYO Policy 52: Avoiding or minimising adverse effects of hazard mitigation measures – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, for hazard mitigation measures, particular regard shall be given to: a) the need for structural protection works or hard engineering methods; a) whether non-structural <u>nature-based solutions, Mātauranga Māori, or soft engineering methods options provide a more appropriate option solution;</u> and b) avoiding structural protection works or hard engineering methods unless it is necessary to protect existing development, <u>regionally significant infrastructure or property from unacceptable risk and the works form part of a long-term hazard risk management strategy that represents the best practicable option for the future;</u> and c) <u>the long-term viability of maintaining a hard engineering approach with particular regard to changing risks from natural hazards over time due to climate change; and</u> d) <u>adverse effects on Te Mana o te Wai, mahinga kai, taonga species, natural processes, and the indigenous ecosystems and biodiversity; and</u> e) <u>sites of significance to mana whenua / tangata whenua, including those identified in a planning document recognised by an iwi authority and lodged with a local authority or scheduled in a district or regional plan; and</u> f) <u>any change in natural hazard risk to nearby areas as a result of changes to natural processes from the hazard mitigation works; and</u> g) <u>the cumulative effects of isolated hard engineering structural protection works; and</u> h) <u>any residual risk remaining after mitigation works are in place, so that they minimise reduce and or do not increase the risks from of natural hazards.</u>	
Regional form, design and function	
NYO Objective 22 <u>A compact, well-designed, climate-resilient, accessible, and environmentally responsive regional form with well-functioning urban areas and rural areas, where:</u> <u>a) there is sufficient development capacity to meet the needs of current and future generations, improve housing affordability and quality, and provide access to a diversity of housing typologies within neighbourhoods which enable choice; and</u> <u>b) Māori are able to express their culture and traditions, and the relationship of mana whenua / tangata whenua with their culture, ancestral land, water, sites, wāhi tapu and other taonga is provided for; and</u> <u>c) Te Mana o te Wai is given effect to; and</u> <u>d) intensification occurs within existing urban zones in appropriate places where it is environmentally responsive; and</u> <u>e) subdivision, use and development is located, designed, and constructed in a way that is climate resilient and contributes to reducing greenhouse gas emissions; and</u> <u>f) built environments, including integrated transport infrastructure, meet the health and wellbeing needs of all people, with multi-modal access including active transport, between housing, jobs, community services, centres, green space, and open space; and</u> <u>g) the biophysical characteristics, location, recognised values, capability and limitations of land inform its use and development; and</u> <u>h) the productive capacity of rural land is retained; and</u>	The proposed development is not fully consistent with this objective. In relation to clause (a), the site was rezoned to medium density residential zone through Variation 1 to the Proposed Porirua District Plan in part to assist to achieve the requirements for housing development capacity within Porirua. The proposal precludes the ability to achieve a diversity of housing typologies within the proposed neighbourhoods due to a proposed consent notice that restricts residential development to one dwelling per allotments and precludes any future subdivision. In relation to clause (b), the expression of the rights and interests of Te Rūnanga in relation to the proposal is acknowledged. Only mana whenua are able to comment on the potential cultural impacts. The application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor. In relation to clause (c), there are significant concerns regarding the proposed stormwater infrastructure, based on the draft comments from Tiaki Wai.

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<u>i) existing urban-zoned land, and infrastructure capacity is used effectively and efficiently; and</u> <u>j) new or upgraded infrastructure is integrated and sequenced with development; and</u> <u>k) development densities are sufficient to support the provision and ongoing maintenance of infrastructure; and</u> <u>l) a variety of residential, commercial, mixed use and industrial development in appropriate locations is provided which contributes to</u> <u>m) viable and vibrant centres at a range of scales, and industrial-based employment locations; and</u> <u>n) the safe and efficient operation of regionally significant infrastructure is protected from potential reverse sensitivity effects.</u>	In relation to clause (d), while the site is currently zoned for medium density residential development, the proposed development specifically excludes medium density housing from being developed through a proposed consent notice. In relation to clause (e), while the site can achieve climate resilience through appropriate engineering of stormwater and earthworks, the form of the development will not contribute to reductions in greenhouse gas emissions. In relation to clause (e) and (f), while provision is made within the site for active transport to a degree, the proposed development does not include any provision for active or public transport to or from the site, and therefore does not contribute to reducing greenhouse gas emissions or provide multi-modal access. In relation to clause (g), the land form of the site has informed the proposed design of the subdivision to a degree. Clause (h) is not relevant. In relation to clause (i), the urban zoned land on the site is not proposed to be used efficiently, as the proposed consent notice limits the residential allotments, which have areas of more than 300 square metres, to one dwelling per allotment. In relation to clause (j), the proposed new and upgraded infrastructure is designed to be integrated and sequenced with the development. However, there are insufficient details on how this is to be achieved and it appears that there are inconsistencies with the proposed staging between the delivery of infrastructure and the delivery of vacant allotments. In relation to clause (k), the proposed development densities are relatively low, and do not achieve the 'predominantly medium density' set out in the PDP objective DEV-NG-O2. In relation to clause (l) and (m) (which are read together), the proposal includes a vacant allotment for a future neighbourhood centre. However, while indicative concepts are presented in the application, no mechanism for delivery of those outcomes is proposed. In relation to clause (n), the potential for reverse sensitivity effects on the state highway are managed through the PDP provisions.
O Objective 22A To achieve sufficient development capacity to meet expected housing demand, the following housing bottom lines in Appendix 7.9A are to be met or	While this objective is not specifically relevant, the site was rezoned through Variation 1 to the Proposed Porirua District

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	exceeded in the short-medium and long term in the Wellington Tier 1 urban environment.	Plan in part to assist to achieve the requirements for housing development capacity within Porirua.
O	Policy 54: Achieving the region's urban design principles – consideration When considering an application for a notice of requirement, or a change, variation or review of a district or regional plan, for development, particular regard shall be given to achieving the region's urban design principles in Appendix 2.	This policy is not relevant as it does not include reference to consideration of resource consent applications. This policy was considered through Variation1 to the PDP.
A	Policy 55: Managing greenfield development to contribute to well-functioning urban areas and rural areas Maintaining a compact, well designed and sustainable regional form – consideration	This policy is not relevant as it relates to urban development beyond existing urban zones.
A	Policy 57: Integrating land use and transportation – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, seek to achieve integrated land use and transport within the Wellington Region by: for subdivision, use or development, particular regard shall be given to the following matters, in making progress towards achieving the key outcomes of the Wellington Regional Land Transport Strategy: <u>a) locating development in areas near centres and well-served by existing or planned public transport, to minimise private vehicle travel and trip length and maximise mode shift to public transport or active modes; and</u> <u>b) supporting connectivity with, and accessibility to public services or amenities, key centres of employment activity or retail activity via public and active transport networks; and</u> <u>c) supporting a safe, reliable, equitable, inclusive and efficient transport network including through connections with the wider transport network; and</u> <u>d) providing safe and accessible multi-modal transport networks along connected routes that are designed for public and active transport, while recognising that the delivery of public transport services may not always be efficient or practical; and</u> <u>e) supporting and enabling the rapid transport network and the growth corridors in the Wellington Region, including:</u> <u>(i) Western Growth Corridor – Tawa to Levin;</u> <u>(ii) Eastern Growth Corridor – Hutt to Masterton;</u> <u>(iii) Let's Get Wellington Moving Growth Corridor; and</u> <u>f) minimising the potential for reverse sensitivity effects on the safe and efficient operation of transport corridors.</u> a) whether traffic generated by the proposed development can be accommodated within the existing transport network and the impacts on the efficiency, reliability or safety of the network; b) connectivity with, or provision of access to, public services or activities, key centres of employment activity or retail activity, open spaces or recreational areas; c) whether there is good access to the strategic public transport network;	The proposed development is contrary to this policy. The location of the site is in a strategic location near to an existing train station which provides commuter services. However, the site itself is not serviced by public transport and has no connection to the active transport network outside of the site. The proposed development does not include any public transport infrastructure within the site or connections to existing active transport infrastructure outside of the site. There is no planned public transport to or within the site. In effect, the only way to access the proposed development prior to the Muri Block to the north being developed, is by private vehicle. As such, the proposal is contrary to clauses (a), (b), (c) and (d). In relation to clause (e), the proposed development does not actively support or enable the rapid transport network or the Western Growth Corridor, as there is no active transport link proposed to the Pukerua Bay train station or other provision for use of the station by commuters within the site. In relation to clause (f), reverse sensitivity effects on the state highway are managed through provisions in the PDP.
A	Policy 58: Co-ordinating land use with development and operation of infrastructure – consideration When considering an application for a resource consent, notice of requirement, or a plan change, variation or review of a district plan, for subdivision, use or development, seek to achieve development that is integrated with infrastructure, in a way that: particular	The proposal is not fully consistent with this policy. The proposed infrastructure is not well integrated with existing water and wastewater infrastructure, or the proposed infrastructure on the site

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	regard shall be given to whether the proposed subdivision, use or development is located and sequenced to: a) makes effective, efficient and safe use of existing infrastructure capacity; and b) makes provision for the development, funding, implementation and operation of infrastructure serving the area in question; and c) all infrastructure required to serve new development is available or is able to be delivered in a timeframe appropriate to service the development, and this may require timing or staging development accordingly. a) make efficient and safe use of existing infrastructure capacity; and/or b) coordinate with the development and operation of new infrastructure.	In relation to clause (a), the development is proposed to make use of existing wastewater and water supply infrastructure capacity. However, based on the draft comments provide by Tiaki Wai, the assumed capacity of the existing Pukerua Bay water reservoir is greater than it is, and the modelling of the impacts on the wastewater network is insufficiently detailed and does not consider all relevant parts of the network. As such, the use of existing networks may not be effective, efficient or safe. In relation to clause (b), the proposal does not make provision for the necessary telecommunication or electricity infrastructure. Additionally, the application takes no account of Tiaki Wai as the water entity for Porirua, and as such the implementation and operation of the three waters infrastructure is not sufficiently addressed. In relation to clause (c), it is not clear when or how the proposed wastewater mitigation via a storage facility is proposed to be developed.
NYO	<u>Policy UD.2: Enable Māori to express their culture and traditions - consideration</u> <u>When considering an application for a resource consent, notice of requirement, or a change of a district plan for subdivision, use or development, enable Māori to express their culture and traditions in land use and development by, as a minimum:</u> <u>a) providing for mana whenua / tangata whenua to express their relationship with their culture, ancestral lands, water, sites, wāhi tapu and other taonga; and</u> <u>b) recognising taonga and sites and areas of significance, awa and moana and important places where mana whenua / tangata whenua practice Mātauranga Māori, including marae and urupā.</u>	The expression of the rights and interests of Te Rūnanga in relation to the proposal is acknowledged. Only mana whenua are able to comment on the potential cultural impacts. The application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor.
A	<u>Policy UD.5: Contributing to well-functioning urban areas – consideration</u> <u>When considering an application for a resource consent, a notice of requirement, or a change, variation or review of a district plan for urban development, including housing and supporting infrastructure, seek to achieve well-functioning urban areas by:</u> <u>a) providing for the characteristics of well-functioning urban environments, in a way that uses land efficiently; and</u> <u>b) where providing housing, seeks to improve housing affordability, quality and choice and provide a diversity of typologies; and</u> <u>c) providing for safe multi-modal access between housing, employment, services, amenities, green space, and local centres, preferably within walkable catchments and using low and zero-carbon emission transport modes; and</u> <u>d) providing for and protecting mana whenua / tangata whenua values, sites of significance to mana whenua / tangata whenua, and their relationship to their culture, ancestral lands, water, sites, wāhi tapu and other taonga; and</u> <u>e) avoiding or mitigating potential adverse effects, including cumulative effects, of urban development on the</u>	The proposal is not fully consistent with this policy. In relation to clause (a), the proposal does not use land efficiently due to the proposed consent notice limiting the future development of the residential allotments to one dwelling and precluding any future subdivision of those allotments. In relation to clause (b), the proposal does not provide a diversity of typologies, and effectively precludes this due to the proposed consent notice limiting development of the residential allotments to one dwelling. In relation to clause (c), while active transport is generally provided for within the site, there is no provision for any access to or from the site via any modes other than private vehicles. In relation to clause (d) and (e), the proposed development includes piping part of Taupō Stream as well as using natural wetlands for

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	<u>natural environment, including on freshwater consistent with Policy 42; and</u> <u>f) coordinating development with infrastructure while prioritising, where possible, the effective and efficient use of existing infrastructure; and</u> <u>g) protecting the operation and safety of regionally significant infrastructure from potential reverse sensitivity effects.</u>	stormwater attenuation. This is potentially contrary to these clauses. In relation to clause (g), the State Highway Noise Control Boundary applies to part of the site. This will manage potential reverse sensitivity effects on the state highway through future development of the vacant allotments proposed to be created.
Resource management with tangata whenua		
O	Objective 23 The region's iwi authorities and local authorities work together under Te Tiriti partner principles for the sustainable management of the region's environment for the benefit and wellbeing of the regional community, both now and in the future.	The expression of the rights and interests of Te Rūnanga in relation to the proposal is acknowledged. Only mana whenua are able to comment on the potential cultural impacts. The application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor.
O	Objective 24 The principles of Te Tiriti o Waitangi are taken into account in a systematic way when resource management decisions are made	
O	Objective 25 The concept and spirit of kaitiakitanga are integrated into the sustainable management of the Wellington region's natural and physical resources.	
O	Objective 26 Mauri is sustained, particularly in relation to coastal and fresh waters.	
O	Objective 27 Mahinga kai and natural resources used for customary purposes, are maintained and enhanced, and these resources are healthy, sustainable and accessible to tangata whenua.	
O	Objective 28 The cultural relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga is maintained.	
O	Policy 48: Principles of Te Tiriti o Waitangi – consideration When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to: a) the principles of Te Tiriti o Waitangi; and b) Waitangi Tribunal reports and settlement decisions relating to the Wellington region.	
Landscape		
O	Objective 17 The region's outstanding natural features and landscapes are identified and their landscape values protected from inappropriate subdivision, use and development.	The application has not assessed these provisions.
O	Policy 50: Managing effects on outstanding natural features and landscapes – consideration When considering an application for a resource consent, notice of requirement or a change, variation or review of a district or regional plan, a determination shall be made as to first, whether an activity may affect an outstanding natural feature and/or landscape, and second, whether or not an activity is inappropriate, having particular regard to the following: a) the degree to which the natural feature or landscape values will be modified, damaged or destroyed including: (i) the duration and frequency of any effect, and/or (ii) the magnitude or scale of any effect; b) the irreversibility of adverse effects on landscape values; c) the resilience of the natural feature, place or area to change; d) the opportunities to remedy or mitigate previous damage to natural feature or landscape values; and e) whether the activity will lead to cumulative adverse effects on the natural feature or landscape values.	The upgrade to the bulk wastewater main in SH59 is partially located within an outstanding natural landscape and feature identified in the PDP (ONFL002). The application includes a plan of the location of the proposed upgrade and long-section at 'Appendix 30-37 - 1753-02-8800-R1-SH59-Bulk Wastewater Upgrades', drawing 8802. However, no cross-sections or earthworks plans are provided. As such, it is considered that the matters in (a) to (e) cannot be determined, and therefore the application is not consistent with these provisions.

Porirua District Plan 2025

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Strategic Direction	
CEI - Centres, Employment and Industry	
CEI-O1 Hierarchy of commercial and industrial centres The City has a hierarchy of accessible, vibrant and viable centres that: 1. Are the preferred location for shopping, leisure, cultural, entertainment and social experiences; 2. Provide for the community's employment and economic needs; 3. Contribute to the community's housing needs; and 4. Contribute to the City's social wellbeing and prosperity.	The site includes an area of Neighbourhood Centre Zone (NCZ). The proposed development does not include development of the NCZ area, other than a proposed neighbourhood community park. While somewhat relevant, the proposed development is therefore neutral in relation to these strategic objectives.
CEI-O5 Neighbourhood Centres Neighbourhood Centres are of a small-scale and provide for the day-to-day needs of the immediate residential neighbourhood.	
FC - Functioning City	
FC-O1 Infrastructure Effective, efficient, resilient and safe infrastructure throughout the City that: 1. Provides essential, reliable and secure services, including in emergencies; 2. Facilitates local, regional and national connectivity; 3. Contributes to the economy and supports a high standard of living; 4. Has sufficient capacity to accommodate existing and planned growth; 5. Integrates with development; and 6. Enables people and communities to provide for their health and wellbeing.	The proposed development is inconsistent with this strategic objective, specifically clauses 2 and 4. The proposed roading network within the development will not facilitate local connectivity, as only one of the three transport connections to the southern boundary identified on the Structure Plan will be enabled. The proposed three waters network will not provide sufficient capacity for the planned growth, as the site is primarily zoned MRZ which enables three dwellings per allotment, but the infrastructure is sized for one dwelling per allotment.
FC-O3 Existing activities Existing lawful activities are protected from incompatible activities.	The proposed development is generally inconsistent with this strategic objective. The proposal includes no-complaints consent notice for allotments adjacent to the southern boundary which adjoins existing and ongoing farming land uses.
FC-O4 Compatible activities Compatible activities are located together in appropriate areas and: 1. Are consistent with the anticipated character and amenity values of the areas where they are located; and 2. Contribute to the efficient use of land, resources and infrastructure.	The proposed development is not fully consistent with this strategic objective. The proposal includes the location of a 'residential' allotment within the Neighbourhood Centre Zone. Additionally, residential allotments are located within close proximity of an existing helicopter hanger and helipad, without any mitigation of possible reverse sensitivity effects proposed.
HCH - Historic and Cultural Heritage	
HCH-O2 Character and identity Porirua's character and identity is reflected throughout the City.	The proposed development is not inconsistent with this strategic objective. Aspects of the proposed development, including requirements through proposed consent conditions for engagement with Te Rūnanga o Toa Rangatira on names for reserves and streets may assist to achieve the objective.
HO - Housing Opportunities	
HO-O1 Housing variety There are a variety of housing types, sizes and tenures available in quality living environments throughout the City that meet the community's diverse housing needs.	The proposed development is not fully consistent with this strategic objective. The proposal includes limiting development of residential allotments via a consent notice to one dwelling per allotment and precluding any future subdivision. This will significantly

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	limit the variety of housing possible within the Mt Welcome area indefinitely.
HO-02 Future urban housing supply The Northern Growth Area and Judgeford Hills, and Silverwood areas of the Future Urban Zone will help meet the City's identified medium to long-term housing needs.	The proposed development is not generally consistent with this strategic objective. The proposal is within the Northern Growth Area and will contribute to meeting the City's identified medium to long-term housing needs.
NE - Natural Environment	
NE-O1 Natural character, landscapes and features and indigenous biodiversity The natural character of the coastal environment and riparian margins, the values and characteristics of the outstanding natural landscapes and features and special amenity landscapes and the significant indigenous biodiversity values that contribute to Porirua's character and identity and Ngāti Toa Rangatira's cultural and spiritual values are recognised and protected and, where practicable, enhanced.	There are riparian margins and significant natural areas located on the site. A small area of Special Amenity Landscape (SAL) is also identified on the site but is not affected by the proposed development. The majority of riparian margins on the site will be located within areas to be vested to council as reserve. The significant natural areas on the site will be protected and enhanced.
NE-O2 Maintaining and restoring indigenous biodiversity values Indigenous biodiversity values in the District are maintained and, where practicable, enhanced.	However, there is an area of SNA within the SH59 road corridor that will be removed as part of the intersection. This also includes piping Taupō Stream, which would result in loss of riparian margins. While the SNA loss is proposed to be offset within the site, the review from council's expert ecologist identifies that there are concerns with the proposed offset calculations. Therefore, the proposal does not appropriately maintain, protect, or enhance the associated indigenous biodiversity values. I understand from liaison with Greater Wellington Regional Council staff that there is uncertainty as to the ecological impacts of the culverting on Taupō Stream and whether the proposed offsets are adequate. As such, the proposal is inconsistent with these strategic objectives.
NE-O3 Open space Porirua's community has access to a diverse and connected network of open spaces within which: 1. There is a wide range of recreational opportunities and experiences; and 2. Areas with natural, ecological and landscape values are protected.	The proposal is generally consistent with this objective, as the development includes a range of recreational opportunities through the provision of parks and reserves within the site.
NE-O4 Preventing further degradation of Te Awarua-O-Porirua Harbour Subdivision, use and development does not contribute to any further degradation of Te Awarua-o-Porirua Harbour and its catchment.	These strategic objectives predate but are closely aligned with the objectives of Te Wai Ora o Parirua. Due to the discharge of the stormwater from the site to Taupō Stream and Kakaho Stream, there is potential for degradation of Te Awarua-O-Porirua, and therefore its health and wellbeing may be adversely affected, during construction and operation of the proposed stormwater network. Based on draft comments from Tiaki Wai, there are significant concerns with the proposed stormwater network, with significant redesign required. These concerns include undersized raingardens which are relied on by the applicant for treatment of the stormwater. Tiaki Wai considers that the
NE-O5 Health and wellbeing of Te Awarua-O-Porirua Harbour The health and wellbeing of Te Awarua-O-Porirua Harbour, and the significant amenity, recreational, ecological and cultural values associated with it, is maintained and protected and, where possible, enhanced.	

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	proposed approach does not demonstrate that adverse effects on the sensitive receiving environments of Te Awarua-o-Porirua Harbour, Taupō Stream and Kakaho Stream will be appropriately avoided, remedied or mitigated. Because of this, the proposal is inconsistent with these strategic objectives.
REE - Resilience, Efficiency and Energy	
REE-O1 Energy efficiency The City makes efficient use of energy in its urban form and in how it functions.	The proposed development is in a strategic location near an existing train station and incorporates elements for provision of active transport within the site, which would enable efficient use of energy in the urban form and function. However, the proposal does not enable active transport beyond the site or public transport within the site. As such, the proposal is not fully consistent with these strategic objectives. The proposal is generally consistent with these strategic objectives, as climate change has been considered through the assessment of flooding effects. Additionally, the development of the site would provide an area of new housing that is not subject to coastal hazards that will be accelerated by climate change. The proposal is inconsistent with this strategic objective, as it proposes a consent notice to restrict development of residential lots to one dwelling and precludes any future subdivision. This effectively is a 'down-zoning' of the MRZ land, as the zone provisions allow for 3 residential units per site. This is an inefficient use of land as a physical resource.
REE-O2 Renewable energy and energy conservation There is reduced reliance on non-renewable sources of energy, increased use of renewable sources of energy and greater energy conservation.	
REE-O3 Resilience There is no significant increase in the risk from natural hazards, including the effects of climate change, to people, property and infrastructure as a result of subdivision, use and development.	
REE-O4 Adapting to climate change Porirua City is prepared to adapt to the effects of climate change and the opportunities and risks associated with those effects are recognised.	
REE-O5 Resource efficiency Porirua's natural and physical resources are used efficiently both now and in the future.	
Tangata Whenua	
TW-O1 Ngāti Toa Rangatira's values, rights and interests The values, culture and traditions, rights and interests of Ngāti Toa Rangatira in their ancestral lands, water, sites, wāhi tapu and other taonga are recognised and protected.	Porirua City seeks to partner with Ngāti Toa Rangatira in all that it does, consistent with TW-O2. The expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. Only mana whenua are able to comment on the potential cultural impacts. The application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor. This would mean that the proposed development would be inconsistent with TW-O1.
TW-O2 Tangata Whenua Relationship with Council Ngāti Toa Rangatira is supported by Porirua City Council in order that the two might operate in partnership in relation to the sustainable management of natural and physical resources under the Resource Management Act, including through Plan development, consent processes, compliance and monitoring in a manner that: 1. Recognises the role of Ngāti Toa as kaitiaki and provides for practical expression of kaitiakitanga; and 2. Recognises and provides for Ngāti Toa mātauranga and tikanga.	
TW-O3 Kaitiakitanga and customary activities Ngāti Toa Rangatira is able to exercise customary activities and sustain themselves through the use and development of their land, including through papakāinga and marae.	
UFD - Urban Form and Development	
UFD-O1 Urban growth Porirua grows in a planned, compact and structured way.	The proposed development is inconsistent with this strategic objective because the proposed development does not achieve the outcomes sought in the Structure Plan particularly in relation to roading connections. These departures from the Structure Plan significantly compromise the ability to achieve the urban development of Porirua's Northern

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	Growth Area in a planned, compact and structured way.
UFD-O2 Urban land supply There is a sufficient supply of land available at all times, which is feasible for development, to meet the City's short and medium-term housing, commercial, industrial and recreational needs.	The proposed development will assist to achieve this strategic objective by providing additional capacity for residential and commercial development.
UFD-O3 Urban form Porirua has an urban form which is: 1. Characterised by a range of intensity of built form, depending on an area's proximity to the metropolitan centre, train stations and local centres; and 2. Connected, accessible and safe and supports the community's wellbeing.	The proposed development is inconsistent with this strategic objective. The zoning of the site provides for medium density residential development; however, the proposed conditions limit the development to one residential dwelling per allotment which are greater than 500m ² on average with the smallest being more than 300m ² . This does not provide the range of intensity of built form anticipated by the strategic objective based on the distance to the Pukerua Bay train station and the proposed neighbourhood centre within the development. Additionally, the departures from the Structure Plan result in an urban form that will not be connected or accessible in the future from the south.
UFD-O4 Future urban areas Future urban growth areas are able to be serviced by infrastructure that has sufficient capacity to accommodate the form and type of development anticipated.	The departures of the proposed development from the structure plan, particularly in relation to roading connections, will significantly compromise the ability to service the wider Northern Growth Area with appropriate infrastructure, particularly roading and associated active and public transport infrastructure. The proposed development is therefore contrary to this strategic objective.
UFD-O5 Subdivision, use and development Subdivision, use and development is integrated with infrastructure and supports Porirua's current and future needs.	The proposed development is generally consistent with this strategic objective; however, as identified in relation to other strategic objectives, there are specific aspects of the proposal that do not fully support Porirua's current and future needs.
UFD-O6 Quality urban design and place making Good quality design contributes to a well-functioning and healthy urban environment in Porirua.	Based on advice from council's expert urban design advisors (McIndoe Urban) the proposed development, as described in the Landscape and Urban Design Strategy, provides generally positive urban design outcomes. There are a number of areas identified where improvements should be made to achieve a well-functioning and healthy urban environment. As such, the proposal is not fully consistent with this strategic objective.
UFD-O7 Well-functioning urban environment A well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The DEV - NG - Northern Growth Development Area chapter notes in the introduction that the Structure Plan will assist in achieving a well-functioning urban environment, and the Development Area provisions will ensure that the Structure Plan is implemented.
INF - Infrastructure	
INF-O1 The benefits of Regionally Significant Infrastructure The national, regional and local benefits of Regionally Significant Infrastructure are recognised and provided for.	The proposed development incorporates Regionally Significant Infrastructure and other infrastructure, including three waters and roading infrastructure, which will provide significant economic, social and cultural benefits, including in relation to health,
INF-P1 The benefits of Regionally Significant Infrastructure Recognise the social, economic, environmental and cultural benefits of Regionally Significant Infrastructure, including:	

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1. The safe, secure and efficient transmission and distribution of gas and electricity that gives people access to energy to meet their needs; 2. An integrated, efficient and safe transport network, including the rail network and the state highways, that allows for the movement of people and goods; 3. Effective, reliable and future-proofed communications networks and services, that gives people access to telecommunication and radiocommunication services; and 4. Safe and efficient potable water, wastewater and stormwater treatment systems, networks and services, which maintains public health and safety.	resilience and wellbeing, to any future residents of the area.
INF-P2 The benefits of infrastructure other than Regionally Significant Infrastructure Recognise the benefits that infrastructure not defined as Regionally Significant Infrastructure provides to the economic, social and cultural functioning of the City and health, resilience and wellbeing of people and communities.	
INF-O2 The protection of Regionally Significant Infrastructure The function and operation of Regionally Significant Infrastructure is protected from the adverse effects, including reverse sensitivity effects, of subdivision, use and development.	The proposed development is adjacent to Regionally Significant Infrastructure including the State Highway, and bulk water and wastewater mains. The proposed development could therefore have adverse effects on the wider Regionally Significant Infrastructure networks, including three waters and transport infrastructure. The proposal also includes the construction of Regionally Significant Infrastructure within the site, being the three waters network.
INF-P5 Adverse effects on Regionally Significant Infrastructure other than the National Grid Protect the safe and efficient operation, maintenance and repair, upgrading, removal and development of Regionally Significant Infrastructure other than the National Grid from being unreasonably compromised by: 1. Considering any potential adverse effects of subdivision, use or development of a site that contains or is adjacent to any Regionally Significant Infrastructure, including: a. The impact of subdivision layout and design on the operation, maintenance and repair, and potential upgrade and development of the infrastructure; b. The extent to which the design and layout of the subdivision demonstrates that a suitable building platform(s) for a dwelling can be provided; c. The extent to which the subdivision design and consequential development will avoid the potential for significant reverse sensitivity effects, and avoid, remedy or mitigate other reverse sensitivity effects on and amenity and nuisance effects of the infrastructure; and 2. Requiring subdivision, use or development of a site that contains or is adjacent to any Regionally Significant Infrastructure to be designed to avoid or mitigate any adverse effects on access to, and the safe and efficient operation and maintenance and repair of, that infrastructure; 3. Only allowing sensitive activities within the Gas Transmission Pipeline Corridor where these are of a scale and nature that will not compromise the Gas Transmission Network; 4. Requiring sensitive activities to be located and designed so that potential adverse effects of the Rail Corridor and State Highways are avoided, remedied or mitigated; and 5. Requiring any buildings or structures to be of a nature and scale and to be located and designed to maintain safe distances from the Gas Transmission Network.	The PDP provisions in the Noise chapter will manage potential reverse sensitivity effects in relation to the State Highway. The design and layout of the subdivision will not have any other potential effects on the State Highway, or the bulk water and wastewater mains located within the highway road corridor. However, the design and layout of the subdivision may result in adverse effects on the Regionally Significant Infrastructure proposed to be developed within the site. The draft comments provided by Tiaki Wai that I have reviewed identify significant concerns with the future ability to undertake the safe and efficient operation and maintenance and repair of three waters infrastructure proposed to be vested, particularly the stormwater infrastructure. The proposed wastewater storage tank is also not demonstrated to be able to be constructed within the allocated allotment, and the constraints on that allotment may also compromise the operation, maintenance, repair and upgrade of that facility. As such, the proposal is not fully consistent with this objective and policy.
INF-O3 Availability of infrastructure to meet existing and planned needs Infrastructure that is safe, efficient, resilient and accessible is available to meet the needs of, and is well integrated with, existing and plan-enabled subdivision, use and development.	The proposed development is not fully consistent with this objective. While infrastructure is proposed to service the development, to limit capacity requirements the application includes limiting development of residential allotments via a consent notice to one dwelling per allotment and precluding

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INF-O5 Providing for infrastructure Infrastructure provides benefits to people and communities and is established, operated, maintained and repaired, and upgraded efficiently, securely and sustainably, while the adverse effects of infrastructure on the environment are appropriately avoided, remedied or mitigated, including effects on: 1. The anticipated planned urban built environment, character and amenity values of the relevant zone; 2. The values and qualities of Significant Natural Areas identified in SCHED7 - Significant Natural Areas, and the identified values and qualities of any other specified Overlay; and 3. The change in risk to people's lives and damage to adjacent property and other infrastructure from natural hazards.	any future subdivision. This is not consistent with the outcome sought in the objective for infrastructure to be well integrated with, existing and plan-enabled subdivision, use and development. The proposal includes infrastructure to support the future development of the proposed vacant allotments. In relation to clause 1, generally the ongoing adverse effects of this infrastructure will be negligible as it will be located underground or within reserves as part of stormwater management areas, and therefore will be consistent with the anticipated planned urban built environment, character and amenity values of the relevant zone. In relation to clause 2, within the SH59 road corridor areas of Significant Natural Areas identified in SCHED7 - Significant Natural Areas is proposed to be removed to enable the proposed roundabout. Review of the Ecological Assessment by Wildlands on behalf of Porirua City identifies issues with the proposed management of the adverse effects of this SNA removal. As such, the proposal is not fully consistent with this clause. In relation to clause 3, while natural hazard risks are managed on the site, based on the draft comments from Tiaki Wai that I have reviewed, there are concerns regarding adverse effects on flood risk downstream of Taupō Swamp as a result of discharges from the proposed stormwater network. As such, the proposal is not fully consistent with this clause.
INF-P3 Infrastructure for planned future growth Recognise that infrastructure needs to be provided in a manner that is safe, efficient, integrated, accessible and available to provide sufficient capacity for existing and plan-enabled subdivision, use and development.	The proposed infrastructure to service the development is not consistent with this policy as it does not provide sufficient capacity for plan-enabled subdivision, use and development. Noting that the proposal includes a proposed consent notice limiting future land use to one dwelling per allotment, the plan-enabled land use is three dwellings per allotment.
INF-P4 Enable appropriate infrastructure Enable, through permitted and controlled activity rules, new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure, including associated earthworks, that: 1. Is of a form, location and scale that minimises adverse effects on the environment; 2. For any new or upgrading of existing infrastructure, is compatible with the anticipated planned urban built environment, character and amenity values of the zone in which the infrastructure is located; and 3. For any maintenance and repair, or removal of existing infrastructure in any specified Overlay, it is of a nature and scale that does not adversely impact on the values and characteristics of an area identified in SCHED7 - Significant Natural Areas, or the identified values and characteristics of any other specified Overlay that it is located within.	Based on the assessment provided by the Applicant, there is no infrastructure proposed on the site that is permitted or controlled activity status.

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INF-P10 Potentially acceptable infrastructure Provide for Regionally Significant Infrastructure and other infrastructure, other than the National Grid, where it can be demonstrated that the following matters can be achieved: 1. Compatibility with the site, existing built form and landform; 2. Compatibility with the anticipated planned urban built environment, character and amenity values of the zone it is located in; 3. Any adverse effects on amenity values are minimised, taking into account: a. The bulk, height, size, colour, reflectivity of the infrastructure; b. Any proposed associated earthworks; c. The time, duration or frequency of any adverse effects; and d. Any proposed mitigation measures; 4. Any adverse effects on the health, wellbeing and safety of people, communities and the environment, including nuisance from noise, dust, odour emissions, light spill and sedimentation are avoided, remedied or mitigated; 5. Any adverse effects on the natural character and amenity of water bodies, the coast and riparian margins and coastal margins are minimised; 6. Public access to and along the coastal marine area and water bodies is maintained or enhanced; 7. Any adverse effects on any values and qualities of any adjacent specified Overlays are minimised; 8. The safe and efficient operation of any other infrastructure, including the transport network, is not compromised; 9. Any adverse effects on indigenous biodiversity are: a. Minimised through site, route, design or construction and method selection, or remedied where necessary; and b. For any residual adverse effects that are more than minor: i. Offset in accordance with the principles in APP8 - Biodiversity Offsetting where practicable; or ii. If appropriate, compensated in accordance with the principles in APP9 - Biodiversity Compensation; to an extent that is commensurate with the scale and nature of those effects; 10. Any adverse cumulative effects are minimised; and 11. Satisfying the provisions of INF-P18 to INF-P24, as applicable, where the infrastructure is located within a specified overlay.	Generally, the proposed infrastructure within the site itself will be consistent with this policy as it will be located underground within the road corridor or within reserves as part of the stormwater management network. Each allotment is required to be provided with legal and practical access along with water, wastewater, stormwater, telecommunications and electricity network connections. These connections and networks are generally consistent with the purpose, anticipated outcomes, character and amenity values of the MRZ and NCZ in which it is located. Construction of these networks will occur before people will be living within the area, and so the temporary effects can generally be managed so that they are acceptable. The proposal includes management plans to address construction effects. However, there is particular infrastructure proposed, or aspects of the infrastructure, that may not be consistent with this policy. There is no information provided for the wastewater bulk main upgrades within SH59 other than a location plan. There are no cross-sections, earthworks plans, or construction methodology provided. As such, the consistency with this policy cannot be properly assessed. Similarly, while one typical cross-section is provided, there are no earthworks plans or construction methodology provided for the proposed water main within SH59. As this infrastructure is proposed to be located within the road reserve of the state highway, clause 8 is particularly relevant to this infrastructure. Within the site, no concept design has been provided for the proposed wastewater storage facility, or cross-sections, earthworks plans, or construction methodology provided. This facility is proposed to be within an allotment that directly adjoins a residential allotment that may be occupied by the time the wastewater storage facility is proposed to be constructed. As such, there are potential adverse effects that cannot be adequately assessed. In relation to clause 9, the proposed roundabout intersection with SH59 requires removal of an area of SNA. The application does not adequately demonstrate that the adverse effects on indigenous biodiversity have been minimised through design selection. Additionally, the Ecological Assessment, while proposing offsetting to address the adverse effects, does not appear to apply the principles in APP8 - Biodiversity Offsetting. As such, the proposed development is consistent with this clause. In relation to clause 11, the relevant provisions of INF-P18 to INF-P24 are assessed below.

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INF-P11 Recognise operational needs and functional needs of infrastructure Recognise the operational needs and functional needs of Regionally Significant Infrastructure and other infrastructure by having regard to the following matters when making decisions on new infrastructure and the maintenance and repair, minor upgrade of the National Grid, and upgrading of existing infrastructure: 1. The extent to which; a. The infrastructure integrates with, and is necessary to support, planned urban development; b. The potential for significant adverse effects have been minimised through site, route or method selection; and c. Functional and operational needs constrain the ability to avoid, remedy or mitigate adverse effects of infrastructure; 2. The time, duration or frequency of adverse effects; 3. The necessity of the infrastructure including; a. The need to quickly repair and restore disrupted services; and b. The impact of not operating, repairing, maintaining, upgrading, removing or developing infrastructure; 4. The location and operational needs and functional needs of existing infrastructure including; a. The complexity and connectedness of networks and services; and b. The potential for co-location and shared use of infrastructure corridors; and 5. The purpose, anticipated outcomes, character and amenity values of the zone in which it is located.	As such, the proposal is not fully consistent with this policy. The new infrastructure proposed to support the future development of the site following the vacant allotment subdivision has operational and functional needs. Each allotment is required to be provided with legal and practical access along with water, wastewater, stormwater, telecommunications and electricity network connections. Generally, these are provided within the road corridor consistent with INF-P17. These connections and networks are generally consistent with the purpose, anticipated outcomes, character and amenity values of the MRZ and NCZ in which it is located. The areas where the operational needs and functional needs of infrastructure may be in contention relates to the proposed roundabout within SH59 which requires removal of an area of SNA. In that case, having regard to the matters in INF-P11, has not been adequately demonstrated that there is a functional or operation need for the infrastructure. While some form of intersection is required, the application does not adequately assess the various options.
INF-O4 Transport network The transport network is safe, effective, accessible, connected and integrated with other land uses, including contributing to the amenity of public spaces, and provides for all transport modes and users to move efficiently and safely within and beyond the City.	The proposed development does not fully achieve this objective, because of the lack of provision for all transport connections to the southern boundary. This will compromise the ability for an accessible and connected transport network across the wider Northern Growth Area in the future and therefore the ability for all transport modes and users to move efficiently and safely within the area.
INF-P14 Operation of the transport network Enable the safe, resilient, effective and efficient operation, maintenance and repair of the transport network to meet local, regional and national transport needs.	This policy is not directly relevant to the proposed development as it relates to the operation of the transport network but will become relevant upon vesting of any transport assets to Porirua City. Because of the staging of the proposed development, vesting of transport assets may occur for earlier stages while further development occurs. The safe, resilient, effective and efficient operation, maintenance and repair of any vested transport network assets will need to be enabled while those further development stages occur.
INF-P15 Upgrading and development of the transport network Provide for the upgrade and development of the transport network where it: 1. Integrates with the existing transport network and any other planned network upgrades or development; 2. Does not compromise the safe, efficient and effective functioning of the transport network;	The proposed development is inconsistent with this policy overall and is directly contrary to specific clauses within the policy. The proposed development is not consistent with, or directly contrary to, clauses 1, 4, 5, 6(a), 6(b), 6(c) and 7, as discussed below. In relation to clause 1, the proposed development integrates with the adjacent State Highway by way of a proposed

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3. Responds to site and topographical constraints including opportunities to reduce the effects of earthworks on landscape and ecological values; 4. Provides for high levels of connectivity within and between transport modes; 5. Provides for pedestrian and cycling safety and connectivity including access to and usability of public open spaces; and 6. Provides roads which: a. Allocate adequate space in the road corridor, taking into account the classification of the road and the communities and land uses it will serve, for: i. Walking; ii. Cycling; iii. Public transport; iv. Network utility infrastructure; v. Refuse and recycling collection; vi. Street lighting; vii. Street trees; viii. Vehicles; and ix. On-street parking; b. Only include no-exit roads where: i. There is no practicable alternative due to site and topographical constraints; and ii. Connectivity for pedestrians and cyclists is maintained through provision of high-quality and convenient access from any part of a no-exit road to the wider transport network; and iii. The no-exit road will serve a low volume of traffic and will have a length that minimises the adverse effects on the connectivity of the transport network, including for pedestrians and cyclists; or iv. Provision is included within the subdivision design for connection of the no-exit road to the wider transport network, through future development or subdivision, that is consistent with any relevant structure plan. c. Include street trees that are suitable for their specific locations in the road reserve, where these: i. Are a species appropriate to the site's growing conditions including soil, slope, aspect, wind, drought and salt tolerance; ii. Contribute to high quality public amenity through species diversity, habitat and food source value and appearance (mature height, stem girth and form); iii. Have low maintenance requirements and high tolerance to pruning; iv. Are sited to avoid compromising traffic safety sightlines in respect of traffic lights, signs, intersections, bus stops, pedestrian crossings and vehicle crossings; and v. Are sited and planted to avoid compromising buildings, structures or infrastructure.	roundabout. However, this has been designed on the basis of a maintaining a 100 km/h rural State Highway. While this may be NZTA's current position, it is noted that the wider Northern Growth Area is transitioning to an urban land use. Additionally, the Structure Plan identifies transport connections along the southern boundary that are intended to enable future integration of the Development Area with the wider Northern Growth Area to the south. The proposed development provides one out of three of these connections. As such it does not appropriately integrate with other planned network and is therefore not consistent with this clause. In relation to clause 2, the Integrated Transport Assessment provided with the application assesses the effects on the functioning of the transport network and concludes that the proposal would not cause the function, safety or capacity of the surrounding road network to be compromised. In relation to clause 3, generally, the proposed transport network appropriately responds to site and topographical constraints. In relation to clause 4, the proposal does not provide for high levels of connectivity within and between transport modes. This is due to the preclusion of any future ability to provide the eastern and western transport connections at the southern boundary as well as a second east-west roading connection from the Upper Terrace to the Lucas Block. This will significantly limit the connectivity of the Development Area, both within the area itself as well as to adjoining land identified for future urban development. Additionally, the proposed roundabout on SH59 will effectively preclude active transport connections from the site to Ara Harakeke Pathway on the western side of the highway. In relation to clause 5, while pedestrian and cycling safety and connectivity is provided for within the site, including access to and usability of public open spaces, the proposal does not provide for pedestrian and cycling connectivity to the wider transport network. As noted above, the proposed roundabout on SH59 will effectively preclude active transport connections from the site to Ara Harakeke Pathway. The proposal also relies on development of the Muri Block for active transport access to the Pukerua Bay train station. As such, the proposal is not fully consistent with this clause. In relation to clause 6(a), while in general the widths of the road reserves provide adequate space for the various transport modes and other necessary uses of the road corridor, no

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	dedicated space within the road corridor on the roading plans has been allocated to public transport. Additionally, no tracking plans for refuse and recycling collection vehicles have been provided. As such, the proposal is not fully consistent with this clause. In relation to clause 6(b), the proposed development includes no-exit roads (cul-de-sacs) that do not meet either subclauses (i) to (iii) or (iv). Effectively, each terrace of the development is one large cul-de-sac and until Muri Road is developed the entire development will have one entry and exit point onto SH59. Many of the cul-de-sacs have footpaths on one side, which is considered to not provide the high-quality and convenient access required by (b)(ii). Only the Upper Terrace (central) road complies with (b)(iii) by enabling future connection of the road consistent with the Structure Plan. As such, the proposal is not fully consistent with this clause. In relation to 6(c), while the assessment in the application states that this clause will be complied with, the proposal does not provide the number of street trees sufficient to meet the requirements of INF-Table 2. As such, the proposal is not fully consistent with this clause.
INF-P21 Upgrades to and new infrastructure in Significant Natural Areas Except as provided for by INF-P7, INF-P8 and INF-P9, only allow for upgrades to existing infrastructure and for new infrastructure in areas identified in SCHED7 - Significant Natural Areas where it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be avoided; and 2. Any adverse effects on indigenous biodiversity values within areas identified in SCEHD7 - Significant Natural Areas are addressed in accordance with ECO-P2 and the matters in ECO-P4, ECO-P11 and ECO-P12.	The proposed intersection with SH59 includes works within SNA027 and SNA029. An operational need or functional need that means the location of the intersection within SNA027 and SNA029 cannot be avoided has not been established at a sufficient level of detail. This is because the options assessment of the intersection contained in section 7.1.2 of the ITA has only been undertaken at a high level and has included assumptions that are considered to be inappropriate. As such, the proposed intersection does meet clause (1). The technical review undertaken by Wildlands has identified issues with the Ecological Assessment, including the identification of extent of clearance of each vegetation and habitat type is needed to quantify effects on vegetation and habitats. The review concludes that <i>"In the absence of information on extents of vegetation and habitat types, it is not possible to properly evaluate effects on indigenous fauna and flora"</i>. Because the effects cannot be properly evaluated, the effects have not been appropriately addressed in accordance with ECO-P2. It appears that the effects management hierarchy in ECO-P2 is not mentioned in the Ecological Assessment. As such, the proposed intersection does meet clause (2).

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	Additionally, it appears that, while offsetting is proposed, the Ecological Assessment does not specifically address the principles of APP8 - Biodiversity Offsetting in accordance with ECO-P4-4. Therefore, overall, the proposed intersection with SH59 is contrary to INF-P21.
INF-P23 Upgrades to and new infrastructure in an Outstanding Natural Features and Landscapes or Coastal High Natural Character Area Except as provided for by INF-P7, INF-P8 and INF-P9 only allow upgrades to existing infrastructure where, and avoid new infrastructure in areas identified in SCHED9 - Outstanding Natural Feature and Landscape or SCHED11 - Coastal High Natural Character Area, unless it can be demonstrated that: 1. There is an operational need or functional need that means the infrastructure's location cannot be avoided, and there are no reasonable alternatives; 2. The design and location of the infrastructure is subordinate to and does not compromise the identified characteristics and values of the Outstanding Natural Feature or Landscape described in SCHED9 - Outstanding Natural Features or Landscapes or Coastal High Natural Character Area described in SCHED11 - Coastal High Natural Character Areas; 3. The natural components of the Outstanding Natural Feature or Landscape or Coastal High Natural Character Area will continue to dominate over the influence of human activity; and 4. Any significant adverse effects are avoided, and any other adverse effects are avoided, remedied or mitigated, while also having regard to the matters in NFL-P3 and NFL-P6 and CE-P3.	The existing wastewater main located in ONFL002 is proposed to be upgraded. This policy has not been assessed in the substantive application. The LVA submitted with the application does not assess the effects on ONFL002, and states: <i>... off-site wastewater infrastructure is subject to ONFL 002. Given this is not related to the main part of the Proposal, and is only a very small area, the writer does not consider it relevant for this assessment.</i> There are no earthworks plans provided with the application relating to the upgrading of the bulk wastewater main. As such, the effects of the proposed upgrading of the wastewater main cannot be determined. Therefore, the proposal is potentially inconsistent with this policy.
INF-P24 Upgrades to and new infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays Only allow for upgrades to existing and new infrastructure in Natural Hazard Overlays and Coastal Hazard Overlays where the infrastructure: 1. Does not increase the risk from the natural hazard to people, or other property or infrastructure; 2. Has a functional need or operational need that means the infrastructure's location cannot be avoided and there are no reasonable alternatives; 3. Is designed to be resilient to the natural hazard; 4. Does not result in a reduction in the ability of people and communities to recover from a natural hazard event; and 5. Is designed to maintain reasonable and safe operation during and in the immediate period after a natural hazard event.	There is new infrastructure and upgrades to existing infrastructure proposed within flood hazard overlays, including inundation and overland flow path areas. This includes both within the site and within SH59. There are no earthworks plans provided with the application relating to the upgrading of the bulk wastewater main of the new water main within SH59. The effects on the flood hazard risks therefore cannot be determined based on the information provided. Therefore, the proposal is potentially inconsistent with this policy.
INF-P28 Official Signs Enable official signs associated with the construction, operation, maintenance and repair or upgrading of infrastructure.	Official signs include all signs required or provided for under any statute or regulation or are otherwise related to aspects of public safety. Signage relating to construction of the proposed development is addressed in section 6 of the draft ECMP. The proposal is consistent with this policy.
THWT - Three Waters	
THWT-O1 Hydraulic neutrality There is no increase in flood risk as a result of use and development within Urban Zones, Settlement Zone, and the Māori Purpose Zone (Hongoeka).	Hydraulic neutrality is addressed in detail in the written comments from Tiaki Wai.
THWT-P1 Hydraulic Neutrality in Urban Zones, Settlement Zone and the Māori Purpose Zone (Hongoeka) Enable new development in the Urban Zones, Settlement Zone and the Māori Purpose Zone (Hongoeka) where it achieves hydraulic neutrality.	I understand that while the application provides calculations that demonstrate that the hydraulic neutrality can be achieved on site, Tiaki Wai have significant concerns with the proposed stormwater system. These concerns include that there may be adverse

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	flooding effects downstream of Taupō Swamp because of the way that wetland acts as a sponge delaying release of water and the interaction with stormwater assets. Further modelling is needed to assess these effects. Additionally, there are post-development catchments within the site that are not proposed to be directed to a 'retention wetland'. These catchments would be subject to the rules and standards in the THWT chapter requiring hydraulic neutrality devices to be installed. As such, the proposal is not fully consistent with this objective and policy.
THWT-O2 Three Waters Network capacity The Three Waters Network can accommodate use and development within Urban Zones, and the areas of the Settlement Zone and Māori Purpose Zone (Hongokea) serviced by all or part of the Three Waters Network.	Effects on the three waters network are addressed in detail in the written comments from Tiaki Wai.
THWT-P3 Three Waters Network capacity Where the level of service of the reticulated water supply, reticulated wastewater and stormwater management networks is insufficient to service the proposed use or development only allow use and development when it can be demonstrated that: 1. It incorporates measures that appropriately mitigate any adverse effects on the Three Waters Network and meet the performance criteria of the Wellington Water Regional Standard for Water Services May 2019; and 2. It will not result in increased flood risk, increased wastewater overflows, or reduced water pressure in the reticulated water network.	I understand that the application has overestimated the number of allotments that can be serviced by the existing water reservoir. Additionally, there are deficiencies in the wastewater modelling provided with the application, and uncertainty in relation to the proposed wastewater mitigation. As such, the proposal is not fully consistent with this objective and policy.
THWT-P2 Integration with the Three Waters Network Require all new buildings in Urban Zones and the areas of the Settlement Zone and Māori Purpose Zone (Hongokea) serviced by the Three Waters Network to: 1. Meet the Council standards for the provision of water supply, wastewater and stormwater management; and 2. Be connected to a water metering device when connecting to the reticulated water network, unless it can be demonstrated that: a. There are physical constraints that prevent a meter being provided; or b. The water demand generated is so low that a meter is not warranted.	This policy is not directly relevant to the proposal as there are no buildings proposed as part of the development. However, the policy requires water meters to be provided for new buildings. This is easiest to do at subdivision stage when the connections to allotments are provided. The application states in Appendix 5 that water metering will be provided; however, this is not stated in the main application or the Civil Infrastructure Report.
TR - Transport	
TR-O1 High trip generating use and development Use and development that generates high numbers of vehicle trips: 1. Does not compromise the safety and efficiency of the transport network; and 2. Is located where it is accessible by a range of transport modes.	The proposal is a high trip generating activity as it exceeds 60 residential units, as set out in TR-S. In relation to TR-O1, the ITA provided with the application concludes that the proposed development would not cause the function, safety or capacity of the surrounding road network to be compromised. The wider site is located in a strategic location with good access to the road networks and the Pukerua Bay train station.
TR-P1 High trip generating use and development Provide for high vehicle trip generating activities where it can be demonstrated that any adverse effects on the transport network will be minimised, having regard to: 1. The extent to which it integrates and co-ordinates with the transport network, including proposed or planned network upgrades and service improvements; 2. The location of the proposed activity and the purpose of the zone it is located in; 3. The transport network's capacity, level of service, form and function;	In relation to the matters in TR-P1 and SH59: <i>Clause 1, 2, 5 and 7</i>: The proposed subdivision is within a residential zone and managed through a specific Development Area chapter, with the intersection in the

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4. The effect of the proposed activity on the transport network and its users; 5. The effect of the proposed activity on the character and amenity values of the surrounding area; 6. The provision for pedestrians, cyclists, public transport users, freight and motorists, as appropriate; 7. Any alternative site access and / or routes available; 8. Any traffic management and travel planning mechanisms; 9. The staging of the activity; 10. Any improvements to the transport network proposed as part of a high trip generating activity development; 11. Any cumulative adverse effects; and 12. Any positive effects.	location shown in the Structure Plan. The proposed development and intersection location, including effects on character and amenity values, is therefore anticipated within the context of the surrounding transport network. <i>Clause 3 and 4:</i> The transport network's capacity and level of service is assessed in the ITA provided with the application. However, the form and function of SH59 in the location of the site a matter of contention. The future form and function of the road should be considered now as part of the proposed development that effectively extends the urban area of Pukerua Bay. Consideration of these matters may result in a significantly different intersection design proposed. <i>Clause 6:</i> The proposal does not include any provision for pedestrians, cyclists, public transport users within the SH59 road corridor. <i>Clause 8:</i> The proposal includes a Construction Traffic Management Plan. No other travel planning mechanisms are proposed. <i>Clauses 9 and 10:</i> The proposal includes construction of an interim 'T' intersection for the first 110 dwellings, and a roundabout to be 'completed' prior to issuing of code of compliance for any dwelling over 110 dwellings within the development. <i>Clause 11:</i> While the ITA provided with the application includes a range of modelled scenarios to assess cumulative effects. However, the AIMSUN model only covers SH59 between Gray Street and Plimmerton. <i>Clause 12:</i> The proposal will have positive economic and social effects from the provision of housing and construction activities. As such, the proposed development is generally consistent with TR-O1 and TR-P1. There are, however, additional considerations in relation to the proposed intersection and the future form and function of SH59. Additionally, further consideration of other travel planning mechanisms and modelling of the effects on the wider transport network needs to be undertaken to fully demonstrate that any adverse effects on the transport network will be minimised
TR-O2 On-site transport facilities and access Use and development has safe and effective on-site transport facilities and site access for all users which do not compromise the safety and efficiency of the transport network.	The proposed development does not achieve this objective as no details have been provided for the individual site vehicle connections for which consent is sought and the proposed conditions do not sufficiently address the matters required.
TR-P2 Appropriate on-site transport facilities and site access Enable on-site transport facilities and site access that:	

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1. Provide for the safe and efficient use of the site and functioning of the transport network; 2. Meet the reasonable demands of site users; and 3. Promote the uptake and use of public and active transport modes TR-P3 Potentially appropriate on-site transport facilities and site access Provide for on-site transport facilities and site access that do not meet standards where it can be demonstrated that the safety and efficiency of the transport network and the health, safety and wellbeing of people within the site and the road reserve is not compromised, having regard to: 1. Whether the projected demand for loading spaces or cycle spaces will be lower than that required in the standards or can be accommodated by shared or reciprocal arrangements; 2. Whether the site is adequately serviced by public and active transport networks; 3. Whether the proposed activities are conducive with, and the facilities support and promote the uptake and use of, public and active transport modes; 4. Whether the facilities are effective in meeting the operational needs and functional needs of the activity on the site; 5. Whether activities have safe and effective access for firefighting purposes; 6. Whether there are site and topographical constraints that make compliance unreasonable; 7. The extent to which public health and safety, including the safety of pedestrians walking through any parking areas, will not be compromised; and 8. Any positive effects.	The proposal is for a vacant lot subdivision. As such, there is no on-site transport facilities and site access proposed.
TR-P4 Connections to Roads Provide for safe and efficient connections between the transport network and on-site transport facilities by requiring connections to roads to address: 1. The classification, characteristics and operating speed of the road and the number and types of vehicles accessing the site; 2. Opportunities to share and minimise the number of connections; 3. Public health and safety including the safe functioning of the transport network and the safety of pedestrians and cyclists; and 4. Site or topography constraints including reduced visibility.	The proposal seeks consent for vehicle crossings to individual lots without providing any details of the proposed location or form of those crossings. The matters in clauses 1, 3 and 4 have been considered, at a general level, for those connections in a memorandum from the Applicant's transport planner. However, clause 2 has not been considered by the Applicant, with the assumption that every residential allotment that is not serviced by a JOAL will have a separate vehicle crossing. As such, the proposal is inconsistent with this policy.
CL - Contaminated Land	
CL-O1 Protection of human health from contaminants Contaminated land is identified before its subdivision, change of use or development and any risks associated with the intended use are addressed so as to protect human health.	The proposal is generally consistent with these objectives and policies.
CL-O2 Positive benefits from treatment and remediation of contaminated land Treatment and remediation of contaminated land contributes to the health and wellbeing of communities, including increased availability of land for housing and business activities.	A PSI has been provided with the application, consistent with CL-O1 and CL-P1. Proposed conditions of consent require A DSI and final CSMP to be provided prior to works commencing in relevant stages, consistent with CL-P2.
CL-P1 Identification of potentially contaminated land At the time of subdivision, change of use or development, identify sites that may be subject to potential contamination as a result of historical land uses and activities.	While additions and amendments to the proposed conditions are recommended to include requirements for a Sampling and Analysis Quality Plan (SAQP) and Remediation Action Plan (RAP) consistent with CL-P2-2 and 3, the general framework of the proposed conditions is consistent with the objectives and policies of the CL chapter.
CL-P2 Minimising risks from contaminated land Minimise the risk to the health of people to an acceptable level from the subdivision, change of use and development of land that may or does contain elevated levels of contaminants by: 1. Enabling site investigations to better understand the type and level of contaminants present;	

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2. Having particular regard to management measures proposed, which may include remediation, containment, or disposal of contaminated soil; 3. Applying a best practice approach to remediation that does not pose a more significant risk to human health than if the remediation had not occurred; and 4. Ensuring the land is suitable for its intended use. CL-P3 Positive effects of the treatment and remediation of contaminated land Recognise that the management, treatment and remediation of contaminated land can provide positive social, economic and health effects for people and the community.	
NH - Natural Hazards	
NH-O1 Risk from natural hazards Subdivision, use and development in the Natural Hazard Overlay do not significantly increase the risk to life, infrastructure or property and do not reduce the ability for communities to recover from a natural hazard event.	Seismic hazards and flood hazards have been considered through the Geotechnical Investigation and Flood Assessment, respectively. Noting that there is no 'Fault Rupture Zone' overlay on the site itself, the proposal is generally consistent with this objective in relation to the area of the development site itself. However, based on comments from Tiaki Wai, there may be potential flooding effects created downstream of Taupō Swamp due to the wetland functioning as a sponge delaying release of stormwater discharged via Taupō Stream. These effects should be modelled to ensure they do not significantly increase the risk to life, infrastructure or property.
NH-P3 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the Medium Hazard Areas Only allow Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the Medium Hazard Areas of the Natural Hazard Overlay where: 1. The activity incorporates mitigation measures that demonstrate that risk to people's lives and wellbeing, and building damage is low, and any damage to buildings is minimised; 2. People can safely evacuate the property during a natural hazard event; and 3. The risk to adjacent properties, activities and people is not increased as a result of the activity proceeding. NH-P4 Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the Low Hazard Areas Provide for Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities within the Low Hazard Areas of the Natural Hazard Overlays where it can be demonstrated that: 1. The activity incorporates mitigation measures that demonstrate that risk to people's lives and wellbeing and building damage is avoided; and 2. The risk to adjacent properties, activities and people is not increased as a result of the activity proceeding.	There are no Hazard-Sensitive Activities and Potentially-Hazard-Sensitive Activities proposed as part of the development. However, the matters in NH-P3 form the matters of control and discretion for consent considered under SUB-R6 and the matters in NH-P4 form the matters of discretion for consent considered under SUB-R8. The flood modelling report provided with the application concludes that the development has an overall "neutral to positive" flood effect. However, as identified above, additional modelling is required in relation to the area downstream of Taupō Swamp. This should be required as a condition of consent to demonstrate the increased runoff volumes from the development are adequately mitigated so that there is no increased risk to SH59 near James Street and surrounding property.
SASM - Sites and Areas of Significance to Māori	
SASM-O2 Kaitiakitanga Ngāti Toa Rangatira are able to exercise kaitiakitanga in relation to sites and areas of significance to them in Porirua City.	There are no Sites and Areas of Significance to Māori (SASMs) identified on the site or adjacent area.
SASM-O3 Subdivision, use and development The values associated with sites and areas of significance to Ngāti Toa Rangatira are protected from inappropriate modification, subdivision, use and development	However, the pre-lodgement consultation with Te Rūnanga o Toa Rangatira identified a number of sites and areas that are of interest to Ngāti Toa Rangatira which may be affected by the proposed development. These objectives are relevant to those site and areas.

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	The expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. Only mana whenua are able to comment on the actual and potential cultural impacts of the proposed development.
ECO - Ecosystems and Indigenous Biodiversity	
ECO-O1 Significant Natural Areas The values of Significant Natural Areas are protected from inappropriate subdivision, use and development and, where appropriate, restored.	SNAs within the Mt Welcome site are proposed to be protected and provided with buffer areas, consistent with the NGDA requirements. However, some of these areas are proposed within road reserve and so will not be able to be addressed by a conservation covenant. This will need to be addressed through changes to the subdivision design. The loss of the area of SNA027 is addressed above under INF-P21.
ECO-P2 Protection of Significant Natural Areas Protect the biodiversity values of Significant Natural Areas identified within SCHED7 - Significant Natural Areas, by requiring subdivision, use and development to: 1. Avoid adverse effects on indigenous biodiversity values where practicable; 2. Minimise adverse effects on the indigenous biodiversity values where avoidance is not practicable; 3. Remedy adverse effects on the indigenous biodiversity values where they cannot be avoided or minimised; 4. Only consider biodiversity offsetting for any residual adverse effects that cannot otherwise be avoided, minimised or remedied and where the principles of APP8 - Biodiversity Offsetting are met; and 5. Only consider biodiversity compensation after first considering biodiversity offsetting and where the principles of APP9 - Biodiversity Compensation are met.	
ECO-P1 Identification of Significant Natural Areas Identify and list within SCHED7 - Significant Natural Areas with significant indigenous biodiversity values in accordance with the criteria in Policy 23 of the Regional Policy Statement.	
ECO-P5 Protection of wetlands Avoid activities that would result in the loss or degradation of the indigenous biodiversity values of wetlands within a Significant Natural Area listed in SCHED7 - Significant Natural Areas, while providing for restoration activities in accordance with ECO-P7.	While the site has wetlands identified by the applicant, there are no wetlands within the SNAs on the site. As such, this policy does not specifically apply.
ECO-P7 Restoration and maintenance initiatives Encourage the restoration and maintenance of indigenous biodiversity, especially in riparian areas and wetlands and their seeps, by: 1. Supporting initiatives by landowners, community groups and others to protect, restore and maintain areas of indigenous vegetation; 2. Promoting the use of locally sourced indigenous vegetation as part of any restorative planting; and 3. Promoting best practice pest animal and pest plant control.	At a general level, the proposal is consistent with this policy. This is because of the compliance with the requirements of the DEV-NG chapter for protection of SNAs and the inclusion of buffer areas and ecological corridors. This will protect, and will assist to restore and maintain, those areas, consistent with this policy. However, some of those areas of SNA and buffer areas are located within road reserve (lots 2000, 2007, 2008 and 2013). As roads are not issued with a record of title, those cannot be legally protected in perpetuity as required in the DEV-NG chapter. Additionally, the proposal includes retirement of relatively large areas of land proposed to be vested as reserve, and the location of streams and wetlands within those areas. Appropriate consent conditions would assist to give effect to clauses 2 and 3.
NATC - Natural Character	
NATC-O1 Protecting, preserving and enhancing natural character	These provisions are not assessed in the application.

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The natural character of coastal margins and riparian margins are preserved, and enhanced where practicable, and protected from inappropriate subdivision, use and development. NATC-P3 Appropriate earthworks Allow for small-scale earthworks in coastal margins and riparian margins where natural character values are maintained. NATC-P4 Inappropriate earthworks Only allow other earthworks within coastal margins and riparian margins where it can be demonstrated that they are appropriate, by taking into account: 1. The effect of the earthworks by scale, volume, depth and location (visibility) on the characteristics and values of the coastal margin or riparian margin; 2. The ability to restore or rehabilitate earthwork areas; 3. How the alignment and location of the earthworks are designed to reduce cut heights and minimise changes to the landform and visual impact; 4. Erosion and sediment control measures; and 5. Effects on indigenous vegetation and effects of the removal of indigenous vegetation on the characteristics and values of the coastal margin or riparian margin.	'riparian margin' includes: <i>5m of the bank of a river whose bed has an average width of less than 3m calculated over the length of river reach flowing through or adjoining the allotment concerned.</i> The plan 1753-02-SK9250-R1-Ecological Overlay in Appendix 30-41 identifies areas of earthworks in the vicinity of streams and lengths of streams that are to be reclaimed. The Ecological Assessment notes that the proposed works affect 450m of stream. As the earthworks are not small-scale they are not allowed for under NATC-P3. The characteristics and values of the affected riparian margins themselves have not been addressed in the application. Therefore, the matters in NATC-P4 are difficult to assess. However, from a broader perspective, the Applicant has not demonstrated that the earthworks are appropriate. As such, without any further assessment provided by the Applicant, the proposal is not consistent with objective NATC-O1 or policy NATC-P4.
PA - Public Access PA-O1 Maintaining and enhancing public and customary access Public and customary access to and along Porirua City's coastal margins and riparian margins is maintained and enhanced. PA-P1 Activities that enhance public and customary access Enable activities in coastal margins and riparian margins that maintain and enhance public and customary access. PA-P2 Mechanisms for improving public and customary access Maintain and enhance public and customary access to and along coastal margins and riparian margins by: 1. Requiring the creation of esplanade reserves and esplanade strips in accordance with SUB-P12; and 2. Considering other opportunities to obtain public and customary access to the coast, Te Awarua-o-Porirua Harbour and waterbodies through subdivision and development.	These provisions are not assessed in the application. 'riparian margin' includes: <i>5m of the bank of a river whose bed has an average width of less than 3m calculated over the length of river reach flowing through or adjoining the allotment concerned.</i> The application includes a Stream Width Assessment. While a stretch of the Kakaho-west main stem greater than 3m in average width is identified within allotments less than 4ha in area, the proposal does not include any esplanade reserves or strips. This is not in accordance with the requirement in PA-P2-1. However, the proposal includes areas of reserves to be vested with council which include streams. This is consistent with PA-O1, PA-P1 and PA-P2-2 as the public access in these areas will be enhanced. As such, overall, the proposal is consistent with these provisions.
SUB - Subdivision SUB-O1 Subdivision design Subdivision creates allotments and patterns of land development that: 1. Are compatible with the anticipated purpose, character and amenity values of each zone;	The proposal is inconsistent with this objective, as it does not achieve the requirements of associated policies assessed below.

Provision	Comments
2. Provide for the health and wellbeing of communities; and 3. Maintain the safety and efficiency of the transport network.	
SUB-O2 Servicing of allotments Subdivisions are appropriately serviced by infrastructure, including that: 1. In Urban Zones allotments are serviced by the Three Waters Network which: - Safeguards the health and wellbeing of people and communities; - Protects property, infrastructure and the environment; and - Is designed to accommodate any proposed or anticipated development; and 2. In non-urban areas allotments are able to be serviced through on-site measures.	I have reviewed draft comments provided by Tiaki Wai. Based on those comments, the proposal is not consistent with this objective as the proposed three waters infrastructure will not achieve the outcomes in clauses (a), (b) or (c).
SUB-P1 Creation of allotments Provide for subdivision where it results in allotments that: - Reflect the intended pattern of development and are consistent with the purpose, character and amenity values of the zone; and - Are of a size and dimension that are sufficient to accommodate the intended development form for that zone; - Maintains indigenous vegetation that is not located within an identified Significant Natural Area; - Ensure the safe operation, maintenance and access to any Regionally Significant Infrastructure on or adjacent to the site, taking into account the outcome of consultation with the Regionally Significant Infrastructure owner, and the matters in INF-P5 and INF-P6; - Minimise natural hazard risk to people's lives and properties; - Within Urban Zones, are adequately served by public open space that is accessible, useable and well-designed; - Have legal and physical access to each allotment created by the subdivision; - Create esplanade reserves where land adjoins MHWS and/or rivers whose bed has an average width of 3m or more; and - For subdivision around buildings that have been approved by way of resource consent, ensure that the staging of the subdivision relative to building construction is efficient and appropriate to the scale and complexity of the overall development.	The proposed development is inconsistent with clause 1, 3, 4, 6 and 8 of this policy. In relation to clause 1, 2 and, 7 the residential allotments follow a standard rectilinear pattern expected of residential development, appear to be a size and dimension that meet the minimums set in the PDP, and they have legal and physical access. The proposed residential development is therefore generally consistent with these clauses. The commercial allotment is a superlot and therefore is expected to be further subdivided in the future. However, the allotment that is to be retained in rural land use (5003), while meeting clauses 2 and 7, is oddly shaped being two larger areas connected by a thin strip that acts to block a possible road connection from the Lucas Block to the southern boundary. Large areas of 5003 are within the MRZ. This allotment is therefore not consistent with clause 1. In relation to clause 3, council's expert ecological advice indicates that there will be indigenous vegetation that is not located within an identified SNA that will be cleared and the effects of this are not being managed in accordance with the effects management hierarchy. This is not consistent with clause 3. In relation to clause 4, the proposal includes three waters infrastructure that would be considered to be regionally significant infrastructure and is proposed to be vested. Based on draft comments from Tiaki Wai that I have reviewed, the proposed subdivision design does not provide sufficient access to the proposed stormwater network assets for maintenance. The proposed development is therefore inconsistent with this clause. In relation to clause 5, natural hazards have generally been adequately considered, and the risk minimised in relation to the development site itself. However, based on comments from Tiaki Wai, there may significant adverse effects as a result of the development downstream of Taupō Swamp. These effects will require additional modelling.

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	In relation to clause 6, while the location and size of the parks and reserves is adequate, no designs of the proposed public open space have been provided, or relevant conditions proposed, and therefore it cannot be determined whether it will be usable or well-designed. As such, the proposal is not consistent with this clause. In relation to clause 8, the proposed subdivision includes allotments less than 4ha in area with rivers whose bed has an average width of 3m or more, but no esplanade reserves are proposed. The proposed development is therefore technically inconsistent with this clause. However, the proposal is consistent with SUB-P12 as assessed below. Clause 9 is not relevant as the proposed subdivision is not around buildings that have been approved by way of resource consent.
SUB-P4 Functioning of the transport network Provide for subdivision where it maintains the safe and efficient functioning of the transport network by: 1. Ensuring roads and any vehicle access to sites meet minimum design standards specified in the Infrastructure and Transport Chapters respectively to allow for safe and efficient traffic movements and can safely accommodate the intended number of users; 2. Where new roads are proposed, identifying opportunities for transport network connections within and between communities and providing as far as practicable for those connections; 3. Providing for a variety of travel modes that reflect the purpose, character and amenity values of the zone, including, where relevant, walking, cycling and access to public transport; and 4. Achieving safe access onto and from state highways, taking into account the capacity of the network.	The proposed development is contrary to this policy, specifically clauses 1 and 2. Only partial consistency is achieved with clause 1 and 3. In relation to clause 1, the proposed roads and vehicle crossings within the site do not meet the minimum design standards specified in the Infrastructure and Transport Chapters. As such, technically the proposal is inconsistent with this clause. I note that that the consent sought has identified non-compliances with the standards. In relation to clause 2, the opportunities for transport network connections within and between communities are identified on the Structure Plan and have also been discussed in the Urban Design Review provided by McIndoe Urban on behalf of Porirua City. These opportunities for transport network connections have not been provided for as far as practicable. This is discussed in more detail in section 6.4.3 of the main body of these comments. In relation to clause 3, the proposal includes provision for a variety of travel modes within the site; however, public transport is not sufficiently provided for in the consent roading design, with detailed design proposed to be used to show provision for future bus stops and shelters along the Site's internal Collector Roads. Additionally, no provision is included for active transport across SH59 to connect to Ara Harakeke Pathway. In relation to clause 4, the application includes a concept designs and associated assessment showing that safe access onto and from SH59 can be provided for vehicles.

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SUB-P5 Integration with infrastructure Require infrastructure to be provided in an integrated and comprehensive manner by: 1. Ensuring infrastructure meets Council standards for the provision of water supply, wastewater and stormwater management and is in place at the time of allotment creation; 2. Ensuring that subdivisions in Urban Zones, Settlement Zone and Māori Purpose Zone (Hongoeka) are hydraulically neutral; 3. Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of the Wellington Water's Regional Standard for Water Services May 2019; 4. Where reticulated services are not available, ensuring allotments are of a sufficient size and shape with appropriate soil conditions to accommodate on-site wastewater, stormwater and water supply infrastructure, and that there is sufficient water supply capacity for firefighting purposes; and 5. Ensuring telecommunications and power supply is provided to all allotments.	The proposed development is contrary to this policy, including clauses 1, 3, 4 and 5. Only partial consistency is achieved with clause 2. In relation to clause 1, based on the draft comments from Tiaki Wai that I have reviewed, the proposed water supply, wastewater and stormwater management on the site does not meet council standards. Additionally, because of issues identified with subdivision staging, the necessary water supply, wastewater and stormwater infrastructure may not be in place at the time of allotment creation. In relation to clause 2, the draft comments from Tiaki Wai that I have reviewed identify that, while hydraulic neutrality could potentially be achieved, the proposed stormwater management on the site has not been developed to achieve the necessary requirements and therefore requires fundamental redesign. This includes in particular the 'retention wetlands', which provide the necessary extended detention to achieve hydraulic neutrality on the site. Additionally, there are proposed allotments that are not within the catchments serviced by the retention wetlands. As such, there is a significant concern that the proposal does not adequately demonstrate that hydraulic neutrality will be achieved by the subdivision. In relation to clause 3, based on the draft comments from Tiaki Wai that I have reviewed, it appears that the reticulated components of the proposed three waters networks are consistent with the Regional Standard for Water Services. In relation to clause 4, this clause is relevant to the 'superlots' proposed to be subdivided as an initial stage prior to urban development. The application does not provide any information on how the superlots would be serviced with water supply, wastewater and stormwater, or how sufficient water supply capacity for firefighting purpose would be provided. While lots 5000, 5001 and 5003 have existing dwellings, this does not negate the need to demonstrate that the standards are, or are not, achieved. Lot 5002 has no existing development, and no information is provided as to how sufficient water supply, wastewater and stormwater will be provided. In relation to clause 5, no information is provided on how telecommunications and power supply will be provided to any allotments proposed.
SUB-P6 Subdivision in the Residential Zones and Māori Purpose Zone (Hongoeka) Provide for vacant lot subdivision within the Medium Density Residential, High Density Residential Zone and Māori Purpose Zone (Hongoeka) where it can be demonstrated that the	This policy is not assessed in the application. The PDP includes a standard (SUB-S1) that requires all vacant allotments to be able to contain a rectangle measuring 9m x 14m. These must be free from yards, easements

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proposed lots are able to accommodate a residential unit that is of a size, scale and location that is anticipated for the Zone.	and infrastructure. This is to enable a residential unit that is of a size and scale anticipated for the zone. The application states that, in relation to the residential lots, all lots will be able to contain a rectangle measuring 9m x 14m. However, this has not been shown on the proposed plans. There are proposed residential allotments that will be significantly constrained by topography following completion of the bulk earthworks, which will impact on the location of the 9m x 14m rectangle. While it appears that the topographically constrained lots may be able to contain the 9m x 14m rectangle within an appropriate location, this is difficult to determine based on the plans provided. As such, this has not been appropriately demonstrated, and the proposal is not fully consistent with this policy.
SUB-P11 Subdivision for infrastructure Control the creation of allotments for the purposes of infrastructure to ensure that: 1. Any allotments are of a size, sufficient design and layout to accommodate its required use; 2. There is adequate access to any proposed allotments; and 3. Infrastructure with sufficient capacity is provided to service any proposed allotment.	This policy is not assessed by the applicant. This policy is relevant to the allotments that will contain the wastewater retention tank, bulk watermain pumpstation, and stormwater treatment and retention areas. In relation to Lot 1300 which relates to the wastewater storage facility, the allotment is potentially not large enough to provide for the required wastewater storage volume. This lot therefore does not meet clause 1. Similarly, it is considered that lot 1400 is not sufficiently sized to house the proposed bulk watermain pumpstation as this is shown on plan 1753-02-5000-R1-Water&Services in Appendix 30-31 as being located directly adjoining the side and rear boundary whereas the infrastructure standards require a 2m setback. Additionally, the proposed raingardens are considered by Tiaki Wai to be undersized and that access for maintenance has not been adequately provided. As such, the allotments for these also do not meet clause 1 of this policy. As such, the proposal is not consistent with this policy.
SUB-O3 Esplanade reserves and esplanade strips Esplanade reserves and esplanade strips created through subdivision contribute to the maintenance, enhancement and protection of ecological, amenity, public access, recreational values and hazard management values of rivers with an average width of 3m or more and the coast.	The Stream Width Assessment provided with the application identified a stretch of the Kakaho-West Main Stem that would trigger the requirement for an esplanade reserve. No esplanade reserve is proposed.
SUB-P12 Reductions or waivers of Esplanade Reserves and Provision of Esplanade Strips Only allow for the provision of an esplanade strip, or a reduction or waiver in the width or provision of any esplanade reserve or esplanade strip, where it can be demonstrated, where relevant, that: 1. Safe public access and recreational use is already possible and can be maintained for the future;	The Applicant considers that the proposal is consistent with SUB-O3 and SUB-P12 because of the retirement, protection and planting of stream corridors and riparian areas across the site, which create and enhance public access, ecological integrity, water quality and hazard management outcomes. The wider development, through the vesting of significant areas of reserves that contain

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2. An esplanade strip would better provide for public and customary access, recreation, hazard management, stormwater management and ecological values; 3. The ecological values and landscape features of the land adjoining the coast or other waterbody will not be adversely affected; 4. Any scheduled historic heritage places and sites and areas of significance to Māori will not be adversely affected; 5. The reduced width of the esplanade reserve or strip is sufficient to manage the risk of adverse effects resulting from natural hazards, taking into account the likely long term effects of climate change; 6. A full-width esplanade reserve or esplanade strip is not required to maintain the natural character and amenity of the coastal environment; and 7. A reduced width in certain locations is offset by an increase in width in other locations or areas which would result in a positive public benefit, in terms of public and customary access, recreation, hazard management, stormwater management and ecological values.	streams, can be considered to offset the requirement for a relatively short stretch of esplanade reserve. As such, the proposal is generally consistent with SUB-O3 and SUB-P12.
EW - Earthworks	
EW-O1 Earthworks Earthworks are undertaken in a manner that: 1. Is consistent with the anticipated scale and form of development for the zone; 2. Minimises adverse effects on visual amenity values, including changes to natural landforms; 3. Minimises erosion and sediment effects beyond the site and assists to protect receiving environments, including Te Awarua-o-Porirua Harbour; 4. Protects the safety of people, property and infrastructure; and 5. Does not compromise the National Grid or the Gas Transmission Pipeline.	In relation to EW-O1: <i>Clause 1 and 2:</i> Based on the technical reviews undertaken by Mr Andrew Gray (PCC) and Mr Matt Wenden (McIndoe Urban) the proposed earthworks are consistent with the anticipated scale and form of development for the zone and appropriately minimise adverse effects on visual amenity values. <i>Clause 3:</i> Stage-specific Erosion and Sediment Control Plans are proposed as a consent condition. Consent conditions are likely to be sufficient to ensure appropriate management of silt and sediment. <i>Clause 4:</i> Expert advice from Tonkin and Taylor indicates that the safety of people, property and infrastructure can generally be addressed through appropriate consent conditions. <i>Clause 5:</i> The National Grid and Gas Transmission Pipeline are not in the vicinity of the site.
EW-P1 Appropriate earthworks Enable earthworks associated with subdivision, use and development, where: 1. They occur in a coordinated and integrated manner; 2. The scale of the earthworks is consistent with the scale and form of development anticipated within that zone; 3. The stability of land is maintained, including the stability of adjoining land, infrastructure, buildings and structures; 4. The area, height or depth, location and slope of the earthworks are of an appropriate scale that will ensure the following potential adverse effects are minimised: a. Visual amenity as a result of cut or fill faces and retaining structures; b. Silt and sediment loss from the site; c. The alteration of natural landforms and features; d. Dust and vibration beyond the site; and e. The safe and efficient operation of the transport network and effects on local amenity values as a result of traffic movements; 5. The area of earthworks minimises the loss of indigenous biodiversity in Rural Zones, Future Urban Zone and Open Space Zone, which is not identified as a Significant Natural Area in SCHED7 – Significant Natural Areas; and 6. The area where earthworks have occurred is reinstated in a timely manner to minimise adverse effects on land stability and the visual amenity of the surrounding area.	In relation to EW-P1: <i>Clause 1:</i> The earthworks are proposed to occur in 8 stages of 5-10ha. <i>Clause 2:</i> Based on the technical reviews undertaken by Mr Matt Wenden (McIndoe Urban) the proposed earthworks are consistent with the anticipated scale and form of development for the zone. <i>Clause 3:</i> Expert advice from Tonkin and Taylor indicates that the safety of people, property and infrastructure can generally be addressed through appropriate consent conditions. <i>Clause 4:</i> • In relation to clause (a), based on the technical reviews undertaken by Mr Andrew Gray (PCC) the proposal appropriately minimises adverse effects on visual amenity. • In relation to clause (b), stage-specific Erosion and Sediment Control Plans are proposed as a

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	consent condition. Consent conditions are likely to be sufficient to ensure appropriate management of silt and sediment. • In relation to clause (c), the earthworks provide for residential development, which is anticipated within the zone. • In relation to clause (d), dust can be managed as part of the ECMP; however, it is noted that no sensitive receptors have been identified. Similarly, vibration will be addressed through the proposed Noise and Vibration Management Plan. • In relation to clause (e), the Civil Infrastructure report states that the earthworks have been designed to minimise the material that needs to be removed from the site. However, the assessment of EW-S3 (Transport of cut or fill material) states that the standard will likely not be complied with; no figures for the volume to be transport off-site is provided. The Integrated Transport Assessment includes consideration of construction vehicle movements. As such, overall, it is considered that the safe and efficient operation of the transport network will be maintained, with acceptable effects on local amenity values. <i>Clause 5:</i> The earthworks are not proposed to occur within one of the listed zones. <i>Clause 6:</i> The Draft ECMP states that stabilisation of exposed surfaces will be undertaken as soon as is reasonably practicable following completion of bulk earthworks. Therefore, the proposed earthworks are generally consistent with the objective and policies, based on the information available and assuming that appropriate conditions are imposed to ensure the stability of land is maintained. However, it the assessment provided by the Applicant in Appendix 5 states that the proposed earthworks design includes retaining structures where necessary. Additionally, the Geotechnical Investigation at Appendix 26 states that: <i>If the recommended cut batter angles are not achievable, the slope should be retained by an engineer designed structure and / or detailed slope stability analysis should be undertaken. Further investigations would be needed for the design of any retaining structures.</i> There is not information on the location or size of these retaining structures. Because of this, if any retaining structures are required,

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	additional resource consents may be necessary.
EW-P2 Earthworks for recreational and community activities Recognise the benefits of and enable earthworks required for the development, repair and maintenance of, play equipment and recreational parks, particularly within the Open Space Zone and the Sport and Active Recreation Zone.	The proposed subdivision includes parks and reserves. No information is included in relation to the earthwork necessary for the development of the play equipment and recreational parks.
LIGHT - Light	
LIGHT-O1 Appropriate lighting activities The benefits of the use of artificial lighting are recognised while any adverse effects generated: 1. Are compatible with the purpose, character and amenity values of the zone and the surrounding area; 2. Minimise disruption to avifauna; and 3. Do not compromise the health and safety of people and communities, including the safety of the transport network.	The Applicant has not assessed these provisions. Lighting of roads is required under the INF-Infrastructure chapter standards. Public street lighting is a permitted activity under LIGHT-R1. The applicant has provided a streetlighting plan in Appendix 29. Streetlighting will form part of the detailed design certification process and is also the subject of a plan to be certified under proposed condition 63, which includes requirements for the lighting to meet the relevant district plan standards. As such, the streetlighting is consistent with these provisions. Lighting of parks, reserves and pedestrian connections may also be required. This has not been addressed by the Applicant.
LIGHT-P1 Appropriate lighting activities Provide for the use of artificial lighting that: 1. Generates positive effects for people and communities from the use of sites and facilities during nighttime hours and contributes to the security and safety of private and public spaces; 2. Maintains the character and amenity values of the zone and the surrounding area; and 3. Does not compromise the social, cultural and economic wellbeing or health and safety of people and communities, including the safety of the transport network.	
LIGHT-P2 Potentially inappropriate lighting activities Minimise the adverse effects of the use of artificial lighting having regard to: 1. The extent to which it avoids conflict with existing sensitive activities and the transport network; 2. Effects on other established uses and their operation; 3. The extent to which any adverse effects can be internalised to the site within which artificial lighting is located, and minimised at site boundaries; 4. The effects on visual observation of the night sky; 5. The intensity, location and direction of artificial lighting; 6. Whether it is consistent with best practice; 7. Any adverse effects on the health, safety and wellbeing of people and communities in the surrounding area, including sleep disturbance; and 8. Any adverse effects on avifauna, where located in the Rural Zones, Future Urban Zone and Open Space Zone.	
NOISE - Noise	
NOISE-O1 Noise generation The benefits of activities that generate noise are recognised while any adverse effects from the generation of noise are compatible with the anticipated purpose, character and amenity values of the relevant zone(s) and do not compromise the health, safety or wellbeing of people and communities.	The proposal is for vacant allotment subdivision. As such, there are few ongoing noise-generating activities. The noise from the proposed infrastructure (such as the water supply pumpstation) is addressed under the INF-Infrastructure provisions above. However, the potential effects of noise from the existing helicopter hanger and helipad has not been addressed by the Applicant. The hanger is located approximately 25 metres from proposed lot 652. It has not been established whether this activity was legally established. As it forms part of the site, the activity should be addressed through the resource consent process.
NOISE-P1 Enable appropriate noise activities Enable the generation of noise from activities that: 1. Maintains the anticipated amenity values of the receiving environment; and 2. Does not compromise the health, safety and wellbeing of people and communities.	
NOISE-P2 Potentially inappropriate noise activities Provide for other activities that generate noise, where these avoid, remedy or mitigate any adverse effects of noise, having regard to: 1. The extent to which it avoids conflict with existing noise-sensitive activities; 2. Effects on other established uses and their operation; 3. Potential effects on activities permitted within the receiving zone;	

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4. The compatibility of the noise with other noises generated from permitted zone activities, and other activities not controlled by the Plan, within the receiving zone; 5. The degree to which the noise breaches the permitted noise standards for the receiving zone(s); 6. Whether adverse effects can be internalised to the site where the noise is generated and the extent to which they can be minimised at site boundaries; 7. The frequency, intensity, duration and offensiveness of the noise generated; 8. Any management plans for managing noise; 9. Whether the activity adopts the best practicable option to avoid, remedy or mitigate adverse effects and the appropriateness of potential mitigation measures to control and monitor the noise levels in addition or as alternatives to the best practicable option; and 10. Any adverse effects on the health, safety and wellbeing of people and communities within the surrounding area, including sleep disturbance and annoyance.	
NOISE-O3 Construction activities Construction activities that generate noise are enabled while ensuring that any adverse effects are minimised.	NOISE-O3 has not been assessed by the Applicant. NOISE-P3 was assessed in a response to the EPA dated 23 April 2026.
NOISE-P3 Noise from construction activities Minimise the adverse effects of noise from construction activities on the amenity values of the surrounding area, having regard to: 1. The sensitivity of the receiving environment; 2. The proposed duration and daily work hours of the construction activities; and 3. Whether compliance with permitted noise standards can be practically achieved in consideration of site, topographical and other constraints.	Construction noise is proposed to be managed through a Construction Noise and Vibration Management Plan. With the proposed conditions the adverse effects of noise from construction activities on the amenity values of the surrounding area will be appropriately minimised.
NOISE-O2 Reverse sensitivity The function and operation of existing and permitted noise generating activities are not compromised by reverse sensitivity effects from the establishment of new or expanded noise-sensitive activities.	These provisions have not been assessed by the Applicant.
NOISE-P4 Reverse sensitivity and health effects in relation to State Highways and the Rail Network Enable new and expanded noise-sensitive activities and places of worship locating adjacent to existing State Highways and the Rail Network that are designed, constructed and maintained to achieve indoor design noise levels and provide for other habitable rooms when they minimise any adverse effects on the health and wellbeing of people from noise and the potential for reverse sensitivity effects from noise, having regard to: 1. The outdoor amenity for occupants of the noise-sensitive activity; 2. The location of the noise-sensitive activity in relation to the State Highway or Rail Network; 3. The ability to appropriately locate the activity within the site; 4. The ability to meet the appropriate levels of acoustic insulation through screening, alternative technologies or materials; 5. The ability to mitigate any effects on buildings from vibration generated by the State Highway or Rail Network; 6. Any mitigation of noise provided by topographical or other existing features on the site or surrounding area; 7. Any adverse effects on the State Highway or Rail Network; and 8. The outcome of any consultation with the Waka Kotahi New Zealand Transport Agency or KiwiRail Holdings Limited.	There are proposed allotments within the State High Noise Control Boundary. These provisions do not directly apply to vacant allotment subdivision as is proposed, as that is addressed by INF-P5. However, future development of those allotments will need to comply with the permitted activity rules or seek resource consent. The proposed roundabout intersection on SH59 will likely change the nature of the noise from the state highway experienced at the site. This has not been addressed by the Applicant.
TEMP - Temporary Activities	
TEMP-O1 The adverse effects of temporary activities Temporary activities can take place where they minimise on-site and off-site adverse effects on: 1. The purpose, character and amenity values of the zone; and	These provisions are not assessed in the application.

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2. The safety and efficiency of the transport network. TEMP-O2 The benefits of temporary activities Temporary activities contribute to a vibrant and safe city, and enhance the wellbeing of its community. TEMP-P1 Benefits of temporary activities Recognise that temporary activities can provide positive social, cultural and economic effects for people and the community. TEMP-P2 Temporary activities Allow temporary activities only where they are located and operated to minimise adverse effects on: 1. The amenity values of adjoining sites and surrounding area, having regard to the purpose of the zone in which they are located; 2. The safety and efficiency of the transport network; and 3. The viability and role of the Metropolitan Centre, Local Centre or Neighbourhood Centre.	Temporary activities include site offices for construction projects. The Draft Earthworks Construction Management Plan states that: <i>The site offices shall be in a portable site shed which will be established on site. This will include facilities such as toilets, a kitchen, meeting rooms and offices. Additional facilities such as separate site sheds, lunchrooms and portaloos shall be in proximity to specific stages and activities, with their type and location determined by the contractor.</i> The application states that the proposed activity will not comply with TEMP-R1 requirements for temporary buildings and structures to be removed within 24 months, as the duration of the construction activities will exceed 10 years. The location of any site offices and workers facilities are proposed to be addressed in the Construction Traffic Management Plan. While these details would be better addressed in the Earthworks and Construction Management Plan, given the size of the site and the large scale development that will take place, the placement of temporary building and structures for site offices can be appropriately addressed through the process for certification of management plans such that the activities would be consistent with these provisions.
RESZ - General Objectives and Policies for all Residential Zones	
RESZ-O1 Housing Choice A relevant residential zone provides for a variety of housing types and sizes that respond to: 1. Housing needs and demand; and 2. The neighbourhood's planned urban built character, including 3-storey buildings.	This objective is not assessed in the application. The proposed development includes limiting the future development of all residential allotments through a consent notice to one dwelling per allotment and precludes any future subdivision of those allotments. This does not provide for a variety of housing types and sizes, or respond to housing needs and demand. The planned urban built character as set out in the Northern Growth Development Area chapter, includes at clause 5 of DEV-NG-O2, achievement of "Predominantly medium density housing with a variety of housing types, sizes and tenures". As such, the proposed development is contrary to this objective.
RESZ-O2 Purpose of Residential Zones Residential zones: 1. Primarily consist of residential activities; and 2. Accommodate other activities that support the health, safety and wellbeing of people and communities, where these are compatible with the planned urban built environment and amenity values of the zone.	This objective is not assessed in the application. The proposed development is for vacant allotment subdivision, primarily to enable residential development. As such, the proposal is consistent with this objective.
RESZ-O3 Sustainable, healthy and safe residential zones The intensity, form and design of use and development in Residential Zones achieves the efficient use of residential land and infrastructure and a healthy and safe built environment, which	This objective is not assessed in the application. The proposed development includes limiting the future development of all residential

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is consistent with the planned urban built environment for the zone or precinct.	allotments through a consent notice to one dwelling per allotment and precludes any future subdivision of those allotments. This does not achieve the efficient use of residential land and infrastructure. The planned urban built character as set out in the Northern Growth Development Area chapter, includes at clause 5 of DEV-NG-O2, achievement of “ <i>Predominantly medium density housing with a variety of housing types, sizes and tenures</i> ”. As such, the proposed development is contrary to this objective.
RESZ-P1 Residential activity Enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments.	This objective is not assessed in the application. The proposed development includes limiting the future development of all residential allotments through a consent notice to one dwelling per allotment and precludes any future subdivision of those allotments. This will preclude a variety of housing types with a mix of densities within the MRZ on the site, including 3-storey attached dwellings, and low-rise apartments. As such, the proposed development is contrary to this policy.
RESZ-P2 Medium Density Residential Standards Apply the MDRS across all relevant residential zones in the district plan except in circumstances where a qualifying matter is relevant (including matters of significance such as historic heritage and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga).	This policy is not assessed in the application. The proposed development includes limiting the future development of all residential allotments through a consent notice to one dwelling per allotment and precludes any future subdivision of those allotments. The MDRS provide for three residential units on an allotment. The proposed development is therefore inconsistent with this policy.
RESZ-P3 Safety and street scene quality Encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.	This policy is not assessed in the application. The assessment of the roading standards states that the standards for street trees will be complied with. The Masterplan and Landscape Urban Design Strategy provided with the application includes proposals for low fencing facing streets and public open spaces. It states that fencing within private lots will be subject to design guidance set out in a Residential Design Guide. However, there are no proposed consent conditions to achieve these outcomes. It also states that ‘low’ fencing would be 1-1.5m in height, which would possibly exceed the height of fences permitted in the district plan where they are located between a principal building and a road of 1.2m.
RESZ-P4 Health and well-being	The proposed development is for vacant allotment subdivision. As such, these policies are not relevant to the current proposal. The district plan provisions will apply to any future development in the MRZ area of the site.
RESZ-P5 Buildings and structures	
RESZ-P6 Providing for development	
RESZ-P7 Health and well-being – Development not meeting permitted activity standards	
RESZ-P8 Urban built environment – Development not meeting permitted activity standards	
RESZ-P9 Height Control – Shading	There are no height control overlay areas on the site.
RESZ-P10 Urban built environment – Development not meeting permitted activity standard for number of residential units on a site	No residential units are proposed as part of the development. As such, this policy is not relevant.
RESZ-P11 Non-residential activities	No activities are proposed as part of the development. As such, these policies are not relevant.
RESZ-P12 Commercial activity	
RESZ-P13 Retirement villages	

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RESZ-P14 Other activities	
MRZ - Medium Density Residential Zone	
MRZ-O1 Planned urban built environment of the Medium Density Residential Zone The planned urban built environment in the Medium Density Residential Zone is characterised by: 1. A planned built form of predominantly three-storey buildings, which is integrated into public and private open space; 2. Good quality on-site and off-site residential amenity that provides for the health and well-being of people residing in the Medium Density Residential Zone; and 3. An urban environment that is visually attractive, safe, easy to navigate and convenient to access.	While this objective is assessed by the Applicant, the assessment appears to bear no relation to the wording of the policy itself. As the proposed development is for vacant allotments, clauses 1 and 2 (in relation to on-site amenity) of this objective will be addressed for future development of those allotments through the zone provisions of the Porirua District Plan 2025. In relation to clause 2 (for off-site amenity) and clause 3, the Masterplan and Landscape Urban Design Strategy provided with the application includes proposals for streets, lighting, planting, wayfinding and public open spaces. However, there are no proposed consent conditions to achieve these outcomes. As such, while the proposed development could potentially be consistent with this objective, the proposal will not ensure that will happen. Additionally, the lack of provision for all the transport connections to the southern boundary mean that, when the wider northern growth area is developed, it may not achieve an urban environment that is 'convenient to access'. As such, the proposal is not fully consistent with this objective.
NCZ - Neighbourhood Centre Zone	
NCZ-O1 Purpose of the Neighbourhood Centre Zone Neighbourhood Centres are small-scale commercial centres that: 1. Service the day-to-day needs of immediately surrounding residential neighbourhoods; and 2. Accommodate a range of small-scale commercial and community activities as well as residential activities.	These objectives relate to clauses 1 and 2 of SUB-P1, which require that subdivision results in allotments that: 1. <i>Reflect the intended pattern of development and are consistent with the purpose, character and amenity values of the zone; and</i> 2. <i>Are of a size and dimension that are sufficient to accommodate the intended development form for that zone;</i>
NCZ-O2 Planned urban built environment of the Neighbourhood Centre Zone Built development in the Neighbourhood Centre Zone: 1. Is consistent with the planned urban built form of the surrounding residential neighbourhood; and 2. Is well-designed and contributes positively to the residential context	Within the area of the NCZ on the site, the proposal is for a single 'superlot' to provide for future commercial development. The built development will therefore be addressed through future consenting processes. While the commercial allotment is smaller than the NCZ itself, it is large enough to provide for the day-to-day needs of immediately surrounding residential neighbourhoods. As such, the proposal is not inconsistent with these objectives.
NCZ-P1 Appropriate activities Enable activities that are compatible with the purpose of the Neighbourhood Centre Zone.	The proposal includes a neighbourhood community park and small areas of drainage reserves within the area of the NCZ. These are appropriate activities that are compatible with the purpose of the zone.
NCZ-P2 Location of residential activity and residential units	

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NCZ-P3 Health and well-being for residential activity and residential units	No other activities are proposed as part of the development. As such, these policies are not relevant.
NCZ-P4 Other activities	
NCZ-P5 Inappropriate activities	
NCZ-P6 Built development	
NCZ-P7 Public space interface	
NCZ-O3 Managing the scale of use and development at Zone interface Use and development within the Neighbourhood Centre Zone: 1. Are of an appropriate scale and proportion for the purpose and planned urban built environment of the zone; and 2. Minimise adverse effects on the amenity values of adjacent sites in Residential Zones and Open Space and Recreation Zones.	While these provisions are focused on the interface of the NCZ with other zones, a neighbourhood community park is proposed to be located within the area of the NCZ. An issue may arise as the PDP standards for bulk and location of buildings and structures in the NCZ refer to boundaries with other zones. This may lead to inappropriate future development within the commercial allotment (Lot 1000) at the interface with the adjoining park and open space.
NCZ-P8 Interface with Residential Zones and Open Space and Recreation Zones Minimise the adverse effects from use and development within the Neighbourhood Centre Zone on directly adjoining sites zoned Residential or Open Space and Recreation by ensuring that: 1. Buildings and activities are located and designed to achieve a transition at the zone interface; 2. Buildings are located and designed to minimise shading and privacy effects; 3. Buildings are of a bulk, height and form that minimises dominance and/or enclosure effects; and 4. Screening and landscaping minimise adverse visual effects.	The Masterplan and Landscape Urban Design Strategy provided with the application includes proposals for managing the interface and creating active edges with the reserve. However, there are no proposed consent conditions to achieve these outcomes. As such, because of the location of the proposed park without any associated conditions for managing the development within Lot 1000, the proposal is not consistent with the intent of this objective and policy.
DEV - NG - Northern Growth Development Area	
DEV-NG-01 Purpose of the Northern Growth Development Area The Northern Growth Development Area contributes to achieving feasible development capacity to meet Porirua City's medium to long-term housing needs.	The proposal is consistent with this objective, as the development of the site would contribute to the development capacity within Porirua City. The proposed staging of the development extends for 10-15 years and so this contribution will continue in the medium to long term.
DEV-NG-02 Planned urban built environment of the Northern Growth Development Area Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves: 1. A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan; 2. A built urban form that responds to the natural landform; 3. A quality living environment that is connected, accessible and safe; 4. A high quality public open space and recreation network that is easy to access and meets the needs of the local community; 5. Predominantly medium density housing with a variety of housing types, sizes and tenures; 6. A neighbourhood centre that serves the needs of the local community; 7. An urban form that is integrated with the transport network, and encourages public and active transport modes while minimising reliance on private vehicles; and 8. Development that maintains and protects and, where possible, enhances ecological values, and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments.	Overall, the proposal is not fully consistent with this objective and is contrary to some specific clauses. In relation to clause 1, the proposed subdivision is not fully consistent with the Northern Growth Development Area Structure Plan. As such, it is not consistent with this clause. In relation to clause 2, it is considered that the proposed development does respond to the natural landform. In relation to clause 3, because the proposed development does not include the internal roading connections and transport connections at the southern boundary as shown on the Structure Plan, as well as lacking connections between cul-de-sacs, it is considered that the subdivision does not provide a connected and accessible living environment and is therefore not fully consistent with this clause.

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	In relation to clause 4, while the Masterplan and Landscape Urban Design Strategy provided with the application includes proposals for parks and reserves, there are no proposed consent conditions to achieve these outcomes. There is no detail provided in any other plans provided with the application to demonstrate that the public open space and recreation network will be high quality, easy to access or meet the needs of the local community. As such, the proposal is not fully consistent with this clause. In relation to clause 5, the proposal includes a consent condition restricting development on residential lots to one dwelling and precluding any future subdivision. This will preclude delivery of any medium density housing throughout the Mt Welcome development. Because of this, the proposal is contrary to this clause. The Panel for the PDP stated in relation to a recommendation to amend DEV-NG-O2-5 that: <i>164. [the s42A reporting officer] recommended amending DEV-NG-O2-5 by inserting the word 'predominantly' at the beginning of the clause. reads "Predominantly medium density housing with a variety of housing types, sizes and tenures."</i> <i>165. We support his recommendation, noting that the Northern Growth Development Area was introduced through Variation 1 into the PDP subsequent to the legislative direction to enable medium density development in all residential areas. Moreover, the land that is subject to Variation 1 is largely zoned MRZ. In our view, the phrase 'medium density housing' is an appropriate description of the expected housing density, but it does not limit the range of housing types that can be delivered through the zone.</i> As such, the proposal is contrary to this clause. In relation to clause 6, the proposal includes a 'superlot' for future commercial development within the area of NCZ on the site. As such, while not directly giving effect to it, the proposal is not inconsistent with this clause. In relation to clause 7, while active transport modes are provided for to an extent within the development, no public transport infrastructure is proposed. Nor is active

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	transport enabled beyond the boundaries of the site. Active transport modes to the Pukerua Bay train station will rely on the Muri Block development, while access to the Ara Harakeke Pathway on the western side of SH59 is precluded by the proposed intersection design. As such, any movement beyond the site will rely solely on private vehicle, and the proposal is therefore inconsistent with this clause. In relation to clause 8, based on the draft comments from Tiaki Wai that I have reviewed the proposed stormwater and wastewater infrastructure risks further degrading the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour. As such, the proposal is inconsistent with this clause.
DEV-NG-O3 Provision of infrastructure Infrastructure with sufficient capacity is provided at the time of subdivision for urban use and is developed in an integrated, efficient and comprehensive manner to meet the planned needs of the Northern Growth Development Area.	The proposed development is contrary to this objective as the three waters infrastructure proposed will not meet the planned needs of the Northern Growth Development Area. To address this, the development includes a proposed consent condition restricting development on residential lots to one dwelling and precluding any future subdivision, which is inconsistent with the planned urban built environment of the Northern Growth Development Area.
DEV-NG-P1 Use and development Enable use and development that is in accordance with the Northern Growth Development Area Structure Plan.	Aspects of the proposed development are in accordance with the Northern Growth Development Area Structure Plan. This includes, broadly, the subdivision of the site for residential, commercial and recreational land uses in the locations identified on the Structure Plan. Those aspects benefit from the enabling approach of this policy. However, there are significant aspects of the proposed development that are not in accordance with the Northern Growth Development Area Structure Plan, including the preclusion of a second east-west roading connection to the Lucas Block and the lack of transport connections to the southern boundary. As such, those aspects of the proposed development do not benefit from the enabling approach of this policy.
DEV-NG-P2 Subdivision Provide for subdivision that is in accordance with the Northern Growth Development Area Structure Plan, and where the design and layout of the subdivision: 1. Integrates the topographical, natural and physical characteristics, constraints and opportunities of the Development Area; 2. Minimises landscape and visual effects of development both within the site and on views of the site from transport corridors, the existing Pukerua Bay urban area, and Whenua Tapu cemetery, through: a. Minimising earthworks and the modification of landform where practicable; b. Integrating the transport network with the existing landform to the extent practicable; c. Providing landscaping within road corridors; d. Creating open space linkages and networks; and e. Retaining existing indigenous vegetation;	The proposed subdivision is not fully in accordance with the Northern Growth Development Area Structure Plan. As such, it does not fully benefit from the enabling approach of this policy. However, for completeness, brief comments are provided on the individual clauses below. In relation to clause 1, while the broader proposed subdivision integrates the topographical, natural and physical characteristics, constraints and opportunities of the Development Area, the roading network does not integrate the opportunities to incorporate connections to the southern boundary in the eastern and western locations shown on the Structure Plan, or the

Provision	Comments
3. Provides adequate and integrated infrastructure to service the needs of the development; 4. Provides a transport network layout and design that: - Is safe for all transport users; - Recognises and provides for transport connections at the boundaries of the Development Area where opportunities exist, including an appropriate connection to State Highway 59; - Provides for roads shown as indicative bus routes as Collector Roads, and other roads as Access Roads; - Provides for active transport and open space connectivity, including by incorporating legal public access along indicative track routes identified on the Structure Plan, and providing for opportunities to create recreational and open space linkages; 5. Recognises and enhances ecological values of the Development Area, including by: - Creating buffer areas around the edges of Significant Natural Areas identified in SCHED7 - Significant Natural Areas; and - Creating ecological corridors in the locations identified on the Structure Plan which will, over time, become dominated by indigenous vegetation, with a sufficient width, scale, and appropriate mitigation of any severance caused by roads, to connect and enhance Significant Natural Areas; 6. Minimises adverse effects on waterbodies; 7. Minimises natural hazard risk to people's lives and properties; 8. Demonstrates that use and development within the Freshwater Management Areas identified on the Structure Plan: - Considers regional plan provisions and the regulations in the NES-F; - Is consistent with Water Sensitive Urban Design principles and Wellington Water's 'Water Sensitive Design for Stormwater: Treatment Device Design Guideline' (Version 1.1, 2019) for the design of any relevant stormwater treatment devices; - Recognises and provides opportunities to enhance freshwater ecology, public access to and along freshwater bodies, and resilience to flood risk; 9. Incorporates stormwater management measures for the treatment and disposal of stormwater at catchment and allotment scales, and achieve hydraulic neutrality; 10. Provides parks, reserves, pathways and open space areas including a neighbourhood community park and neighbourhood parks, and gully and hilltop reserves where opportunities exist; and 11. Minimises the potential for reverse sensitivity effects and other effects at the interface of different zones within the Development Area	opportunity to enable a second east-west roading connection. In relation to clause 2, the landscape and visual effects are considered to be acceptable, based on the technical review of the Landscape and Visual Effects Assessment provided by Porirua City's Landscape Architect. In relation to clause 3, the proposed development does not provide adequate and integrated infrastructure. This is based on the draft comments provided by Tiaki Wai that I have reviewed, which identifies significant deficiencies in the proposed three waters infrastructure, particularly in relation to stormwater. Additionally, there is no information on the proposed electricity or telecommunication infrastructure proposed for the site. In relation to clause 4, the proposed transport network does not meet subclause (b) as the proposed subdivision does not recognise and provide for transport connections at the southern boundaries of the site where opportunities exist as identified in the Urban Design Review provided by McIndoe Urban on behalf of Porirua City. In relation to clause 5, the proposed subdivision includes the buffer areas and ecological corridors as required. However, some of those areas are within allotments proposed to be vested as road and therefore the proposed legal mechanisms for protection in perpetuity cannot be achieved. In relation to clause 6, the effects on waterbodies are addressed by comments from the Greater Wellington Regional Council. The proposal includes piping approximately 110 metres of Taupō Stream as a result of the proposed intersection design. Additionally, the draft comments provided by Tiaki Wai that I have reviewed identify concerns in relation to the receiving waterbodies for the proposed stormwater discharges, with adverse effects on the sensitive receiving environments of Te Awarua-o-Porirua Harbour, Taupō Stream and Kakaho Stream not being demonstrated to be appropriately avoided, remedied or mitigated. In relation to clause 7, while natural hazards on the site are generally minimised in accordance with this clause, the draft comments provided by Tiaki Wai that I have reviewed identify concerns in relation to potential adverse flooding effects on the areas downstream of Taupō Swamp. In relation to clause 8, while the majority of the Freshwater Management Areas identified on the Structure Plan are located in areas

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	proposed to be vested as reserves, there are significant areas that are proposed to be developed for residential purposes and so do not meet any of the subclauses. While the introduction to the NGDA chapter states that, <i>“Other activities may also need to locate or be undertaken within these areas to enable the wider development of the area, such as infrastructure or earthworks”</i>, this does not anticipate significant residential development within the Freshwater Management Areas. Where the Freshwater Management Areas are proposed for stormwater management, this is not consistent with Water Sensitive Urban Design principles and Wellington Water’s (now Tiaki Wai’s) ‘Water Sensitive Design for Stormwater: Treatment Device Design Guideline’, as that guideline only addresses constructed wetlands not extended detention ponds within existing natural wetlands. Based on the draft comments from Tiaki Wai that I have reviewed, the proposed ‘retention wetlands’ may also result in adverse freshwater ecology effects, and therefore are not consistent with clause (c). In relation to clause 9, the draft comments provided by Tiaki Wai that I reviewed identify significant deficiencies in the proposed stormwater management measures. This includes a lack of allotment-scale stormwater management measures. In relation to clause 10, the proposal includes parks and reserves including a neighbourhood community park and neighbourhood parks. However, the Urban Design Review provided by McIndoe Urban on behalf of Porirua City identifies opportunities to enhance the open space network by changing the location of some of the proposed parks. In relation to clause 11, the proposal includes consent notices in the proposed conditions to address potential reverse sensitivity effects along the southern boundary. Taking the above into account, in addition to the aspects of the proposal that are not in accordance with the structure plan, the proposal is not consistent with clauses 1, 3, 4, 6, 7, 8 or 9 of this policy
DEV-NG-P3 Appropriate development Only allow subdivision, use and development that is not in accordance with the Northern Growth Development Area Structure Plan where it is demonstrated that it is appropriate for such subdivision, use or development to occur within the Development Area, having regard to whether: 1. The purpose and effects of the subdivision, use or development are likely to constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan, including consideration of: a. The compatibility of the type, location and density of the development with the planned urban form of the Northern Growth Development Area;	The proposed development is not in accordance with the Northern Growth Development Area Structure Plan and therefore this policy is particularly relevant. It is considered that, overall, having regard to the matters in clauses 1 to 7, the proposed development does not demonstrate that it is appropriate to occur within the Development Area. Brief comments on each clause is provided below: In relation to clause 1, the proposed subdivision design is considered to constrain,

Provision	Comments
b. The integration of topographical, natural and physical characteristics, constraints and opportunities; c. Risks from natural hazards to people, property and the environment; d. Maintaining and enhancing ecological values within and adjacent to the Development Area; e. The need for adequate, coordinated and integrated infrastructure to meet the planned urban needs of the area; f. Safe and connected transport networks that allow ease of movement for all modes to, from and within the Development Area; and g. Integrated and accessible open space networks and reserves; 2. The effects on the landscape and visual amenity from earthworks, the modification of landform, and the location and design of the transport network will be minimised; 3. It will compromise any cultural, spiritual and/or historical values, interests or associations of importance to Ngāti Toa Rangatira that are associated with the Northern Growth Development Area and if so, the outcomes of any consultation with Ngāti Toa Rangatira, in particular with respect to mitigation measures and/or the incorporation of mātauranga Māori principles into the design and development of the activity; 4. It would provide for or support the future needs of the Development Area; 5. Its scale, design and layout is compatible with the planned urban built environment of Development Area as it transitions and once urbanised as set out in the Structure Plan; 6. Any adverse visual effects can be appropriately avoided, remedied or mitigated through screening, planting, building design, siting, and the retention of existing vegetation; and 7. Staging is appropriate to ensure development occurs logically and achieves good urban form.	limit and compromise the intended development and use of the Development Area as set out in the Structure Plan: • <i>Clause (a)</i>: The proposed development includes limiting the density of residential development to one dwelling per allotment. This is not compatible with the planned urban form of the Northern Growth Development Area, which includes “<i>Predominantly medium density housing with a variety of housing types, sizes and tenures</i>” (clause 5 of DEV-NG-O2). • <i>Clause (b)</i>: The broader proposed subdivision integrates the topographical, natural and physical characteristics, constraints and opportunities of the Development Area with development along the ridgelines of the hilly terrain and generally avoiding the more sensitive areas within the gullies. • <i>Clause (c)</i>: Natural hazards on the site are generally minimised. However, it is noted that the draft comments provided by Tiaki Wai that I reviewed identify concerns in relation to potential adverse flooding effects on the areas downstream of Taupō Swamp. • <i>Clause (d)</i>: Terrestrial ecological values within the site are generally maintained or enhanced. However, the proposal includes clearance of Significant Natural Areas within the SH59 road reserve. Only a part of this area is proposed to be offset within the Development Area. • <i>Clause (e)</i>: The proposal does not include adequate, coordinated and integrated infrastructure to meet the planned urban needs of the area. The draft comments provided by Tiaki Wai, that I reviewed, identify significant deficiencies in the proposed three waters infrastructure particularly in relation to stormwater. The three waters infrastructure has been sized to provide for one dwelling per allotment, whereas the planned urban needs includes the zoning of the site which allows for three dwellings per allotment and seeks predominantly medium density housing. Additionally, there is no information on the proposed electricity or telecommunication infrastructure proposed for the site. • <i>Clause (f)</i>: The proposal does not provide connected transport networks that allow ease of movement for all modes to, from and within the Development Area. The future movement to and from the area from the south is compromised by the lack of transport connections to the

Provision	Comments
	southern boundary in the eastern and western extents of the site. • <i>Clause (g)</i>: The proposal includes parks and reserves including a neighbourhood community park and neighbourhood parks. However, the Urban Design Review provided by McIndoe Urban on behalf of Porirua City identifies opportunities to enhance the open space network by changing the location of some of the proposed parks to make these more accessible and better integrated into the subdivision design. In relation to clause 2, the landscape and visual effects are acceptable, based on the technical review of the Landscape and Visual Effects Assessment provided by Porirua City's Landscape Architect. In relation to clause 3, written comments on the application have also been sought from Te Rūnanga o Toa Rangatira. The expression of the rights and interests of Te Rūnanga in relation to the proposal are acknowledged. Only mana whenua are able to comment on the potential cultural impacts. I note that the application states that effects on values of significance to Ngāti Toa as Mana Whenua may be more than minor. In relation to clause 4, the proposed development includes some aspects that would provide for or support the future needs of the Development Area. Including allotments for future residential, commercial and recreational land uses. However, the proposal also precludes critical transport connections and does not provide sufficient infrastructure. As such, overall, the proposed development is not fully consistent with this clause. In relation to clause 5, DEV-NG-O2 sets out the planned urban built environment of the Northern Growth Development Area. The assessment of DEV-NG-O2 above is that the proposed development is not fully consistent with the objective and is contrary to some specific clauses. As such, that proposed development is not compatible with the planned urban built environment of Development Area as set out in the Structure Plan. In relation to clause 6, the proposal is for vacant allotment subdivision, with no buildings proposed to be consented. As such, this clause is not relevant. In relation to clause 7, the proposed conditions include a condition to enable subdivision staging to occur in any order.
DEV-NG-P4 Inappropriate development	The proposed development is not fully in accordance with the Structure Plan.

Provision	Comments
Avoid subdivision, use or development that is not in accordance with the Northern Growth Development Area Structure Plan, where these: 1. Constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan; 2. Result in adverse effects on the planned urban built environment of the Development Area, which cannot be appropriately avoided, remedied or mitigated; or 3. Do not provide sufficient infrastructure to service its needs and/or constrain, limit or compromise the efficient provision of infrastructure to service the Structure Plan.	The proposal would constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan due to the preclusion of any future ability to provide the eastern and western transport connections at the southern boundary as well as a second east-west roading connection from the Upper Terrace to the Lucas Block. The proposal would result in adverse effects on the planned urban built environment of the Development Area which cannot be appropriately avoided, remedied or mitigated due to the proposed limiting of residential development to one dwelling per allotment, which will preclude the achievement of <i>“Predominantly medium density housing with a variety of housing types, sizes and tenures”</i> as set out in clause 5 of DEV-NG-O2. Additionally, while generally providing for active transport within the site, the development will not achieve <i>“An urban form that is integrated with the transport network, and encourages public and active transport modes while minimising reliance on private vehicles”</i> as set out in clause 7 of DEV-NG-O2, as there are no connections proposed to be provided to the wider transport network for pedestrians or cyclists or any ability to access the Pukerua Bay train station without using a private vehicle. Based on the draft comments provided by Tiaki Wai, that I reviewed, there are significant deficiencies in the proposed three waters infrastructure particularly in relation to stormwater. Therefore, the proposal does not provide sufficient infrastructure to service the needs of the development. As such, the proposed development would be captured by this policy.

Appendix B. Assessment of Rules and Standards

The assessment below identifies where differences have been identified from the assessment provided in the application. As such, not every relevant rule or standard is discussed.

Rule	Comments
Energy, Infrastructure and Transport	
INF – Infrastructure	
INF-R2 Noise from construction of new infrastructure and the maintenance and repair, upgrading and removal of existing infrastructure	The additional information provided to the EPA sought consent under INF-R2. It is acknowledged that the Applicant has made clear that it intends the application to include this rule. However, for clarity, the application documents should be updated to reflect that the land use consent now includes non-compliance with this rule.
INF-R4 Upgrading of existing infrastructure, excluding roads, gas transmission pipelines and transmission lines over 110kV, outside of any specified Overlay	Compliance with INF-S1-12.a is not assessed in relation to INF-R4. Based on the wastewater trunk upgrade plans, it is considered likely that this standard is not complied with. This may make those sections of realignment of the wastewater bulk main new infrastructure, rather than an upgrade, depending on the scale of the difference in location. This may affect the relevant rules and standards that need to be assessed.
INF-R8 Upgrading of infrastructure, excluding roads, gas transmission pipelines, walkways, cycleways and shared paths, and transmission lines at or over 110kV, in a Natural Hazard Overlay or Coastal Hazard Overlay	INF-R8 relates to upgrading of infrastructure within a Natural Hazard Overlay or Coastal Hazard Overlay and has been assessed in the application in relation to the upgrades of main trunk wastewater infrastructure. Compliance (or non-compliance) with conditions in the rule cannot be confirmed as there is no construction methodology or earthworks plans provided for the proposed bulk wastewater main upgrade.
INF-R13 Cabinets (not regulated by the NESTF) located outside of any specified Overlay	INF-R13 relates to cabinets and has been assessed as not being complied with in the application, and consent has been sought. Compliance with the rule and associated standards cannot be confirmed, and the effects cannot be assessed, as no cabinets are shown on the plans, and no proposed locations or typical drawings are provided.
INF-R19 Above ground lines including associated support structures, excluding transmission lines over 110kV (not regulated by the NESTF or NESETA), outside of any specified Overlay	INF-R19 and INF-R20, relating to above ground lines and customer connections respectively, have not been assessed. These need to be assessed in relation to utility networks; however, insufficient information is provided in the application to enable these to be assessed in terms of compliance. This is particularly relevant to the proposed 'superlots'. The Applicant has stated verbally that electricity lines will be undergrounded; this should be reflected in the application documentation for clarity.
INF-R20 Customer connections outside of any specified Overlay	
INF-R26 Infrastructure not otherwise provided for or subject to any other rule in this table	INF-R26 relates to infrastructure not otherwise provided for or subject to any other rule in the INF-Infrastructure chapter. This has been assessed in the application in relation to wastewater retention tanks and pump stations. However, these are shown on the wastewater long-sections as being located underground, so rule INF-R16 is the correct rule for these activities. No construction methodology or earthworks plans have been provided for the wastewater storage facility. The storage tank is to be located within Stage 1 but is identified in the Civil Infrastructure Report as being installed at later stages of the development (i.e. after bulk earthworks are completed for Stage 1). As such, construction of this infrastructure may trigger additional consent requirements.
INF-R38 Upgrading of infrastructure, excluding roads and walkways, cycleways and shared paths, located in an area	INF-R38 has been assessed in the application in relation to the upgrades of main trunk wastewater infrastructure which is within SNA027. However, assessment of the compliance with the relevant standards is incomplete, specifically in relation to INF-S18 and INF-S20.

Rule	Comments
identified in SCHED7 - Significant Natural Areas	
INF-R40 New transmission lines and new transformers, substations, switching stations and ancillary buildings for the electricity network, including any ancillary access tracks	INF-R40 has not been assessed in the application. This rule relates to transformers, substations, switching stations and ancillary buildings for the electricity network. The Infrastructure Report states that 'reinforcement' of the electricity network is required. As such the rule may be triggered by activities required on the site, such as a new switching or sub-station; however, insufficient information is provided in the application to enable this rule to be assessed in terms of compliance. It is noted that Appendix 4 of the Application includes reference to 'INF-R40'; however, the rule assessed is actually INF-R43.
INF-R42 New infrastructure, including any ancillary access tracks, excluding walkways, cycleways and shared paths, located in an area identified in SCHED7 - Significant Natural Areas	INF-R42 relates to new infrastructure located in an area identified in Significant Natural Areas and has not been assessed. The main collector road reserve is partially located within SNA029 and so would fall under this rule.
INF-R43 Upgrading of infrastructure and new infrastructure, including any ancillary vehicle access tracks, excluding walkways, cycleways and shared paths, which is located in an area identified in SCHED 9 - Outstanding Natural Features and Landscapes	The Application includes assessment of rule INF-R43; however, the rule reference incorrectly states 'INF-R40' rather than INF-R43.
THWT - Three Waters	
THWT-R1 New buildings and additions to existing buildings	THWT-R1 is included in the Applicant's assessment, which states that compliance is achieved. It is, however, not clear why this rule has been assessed in the application as 'complies' when no buildings are proposed as part of the development. Assessment of this rule will occur when the allotments are developed in the future. However, for completeness, it is noted that there are areas of the proposed subdivision that will not be serviced by attenuating stormwater infrastructure (the 'retention wetlands'). These areas are identified on the plans provided at Appendix 30-29 - 1753-02-4650-R1-SW-Post-Dev-Catchments. Therefore, clause THWT-R1-1.b of this rule would not apply to those areas and hydraulic neutrality devices would be required to be installed when the relevant allotments are developed. This is not explained in the applicant's assessment.
TR – Transport	
TR-R1 All activities with no on-site vehicle parking or loading spaces	TR-R1 has not been assessed. There may be allotments where vehicle access is not provided, for example access lots to reserves. These should be assessed against the standards for pedestrian and cycling access.
TR-R2 All activities with on-site vehicle parking or loading spaces or where a vehicle access is otherwise provided	TR-R2 and TR-R3 relate to vehicle accesses and parking respectively. These rules have been assessed in the application and consent sought, but no information is provided in the plans for these activities. Compliance with the standards therefore cannot be determined and the effects cannot be assessed.
TR-R3 All activities with on-site parking or loading spaces – Dimensions and manoeuvring	

Rule	Comments
Hazards and Risks	
CL-Contaminated Land	The CL-Contaminated Land and HAZ - Hazardous Substances chapter do not contain any rules or standards, as they rely on regulations outside of the district plan.
NH-Natural Hazards	The rules in the NH-Natural Hazards chapter generally relate to activities defined in the PDP as a ‘Hazard-Sensitive Activity’, ‘Potentially-Hazard-Sensitive Activity’ or ‘Less-Hazard-Sensitive Activity’. Other rules relate to works undertaken by a statutory agency and so do not relate to the applicant. The proposed development does not include any Hazard-Sensitive or Potentially-Hazard-Sensitive activities and so those rules are also not relevant. In relation to Less-Hazard-Sensitive Activities, while these include potentially relevant activities such as buildings and structures that are not used for hazard-sensitive or potentially-hazard-sensitive activities and park facilities and furniture, there is insufficient information to determine whether there are any proposed within the existing flood hazard areas. Additionally, the maps produced with the flood assessment provided with the application identify that the relevant areas will be generally free from flood hazards post-development. As such, rule NH-R1 is also considered to not be relevant.
Natural Environment Values	
ECO - Ecosystems and Indigenous Biodiversity	
ECO-R1 Trimming, pruning and removal of vegetation within a Significant Natural Area	ECO-R1 and ECO-R4 have been assessed by the Applicant in relation to the proposed roundabout on SH59 and removal of vegetation within SNA027. The INF-Infrastructure chapter is standalone, meaning activities for infrastructure do not need to be considered under other chapters. The activities within SNA027 are associated with the roundabout and will occur within the road reserve and are therefore addressed under INF-R30. ECO-R1 and ECO-R4 are therefore not relevant to those activities.
ECO-R2 Removal of non-indigenous (exotic) vegetation within a Significant Natural Area	
NATC - Natural Character	
NATC-R1 Buildings and structures within coastal margins and riparian margins, including additions to existing buildings and additions to existing structures	NATC-R1 has not been assessed. The assessment of the roading standards states that there may be retaining structures within road reserve. It is not clear from the plans where any structures for retaining are to be located and if they will be located within riparian margins. There may also be other structures (that are not infrastructure, and therefore covered by the INF rules and standards) that are also proposed to be located within riparian margins.
NATC-R2 Earthworks within coastal margins and riparian margins	NATC-R2 has been assessed in the application, but the assessment only relates to the wastewater upgrades in SH59 which are addressed by the INF rules and standards. The assessment, however, omits consideration of earthworks not connected with infrastructure within 5m of any rivers below 3m in average width.
Subdivision	
SUB – Subdivision	
SUB-R3 Subdivision that creates any vacant allotments, excluding new allotments for infrastructure	SUB-R3 is included in the Applicant’s assessment. The assessment states that “Allotments in all zones will have provision for connection to fibre optic cable connections”. This is not shown on the plans. No assessment is included in relation to power supply (SUB-S7-4) or the setting aside of sufficient land for telecommunication and electricity supply at the time of subdivision (SUB-S7-5). Additionally, the application has not shown or discussed compliance with subdivision standards for the superlots (5000, 5001, 5002 and 5003) in relation to access, water supply, wastewater and stormwater disposal and telecommunications and power supply.
SUB-R5 Subdivision of land to create new allotment(s) for Infrastructure	SUB-R5, which addresses subdivision of land to create new allotment(s) for Infrastructure, is included in the Applicant’s assessment. The Applicant’s assessment refers to allotments proposed to be vested in Council as

Rule	Comments
	recreation reserve. Recreation reserves are not infrastructure and therefore do not fall under this rule.
SUB-R8 Subdivision that creates building platforms for Hazard-Sensitive Activities or Potentially-Hazard-Sensitive Activities within the Low, Medium or High Hazard Areas of the Natural Hazard Overlay or Coastal Hazard Overlay	SUB-R8 addresses subdivision that creates building platforms for Hazard-Sensitive Activities or Potentially-Hazard-Sensitive Activities within the Low, Medium or High Hazard Areas of the Natural Hazard Overlay or Coastal Hazard Overlay and is included in the Applicant's assessment. The application states that here are building platforms located in areas currently mapped as High Hazard Areas (Flood Hazard – Stream Corridor); however, no building platforms are identified on the plans. Compliance with this rule cannot be assessed, and assessment of the effects cannot be undertaken.
General District-Wide Matters	
EW – Earthworks	
EW-R1 General Earthworks	EW-R1 relates to general earthworks and is included in the Applicant's assessment. While the applicant states that relevant standards will not be met, no information is provided on where and to what extent the standards will not be met. Appropriate assessment of the effects, therefore, cannot be properly undertaken.
LIGHT – Light	
LIGHT-R1 Outdoor artificial lighting	LIGHT-R1 is included in the Applicant's assessment. The assessment states that this rule applies to street lighting and lighting of parks and reserves and that lighting will comply with these standards. The lighting plan provided with the application only addresses street lighting (which is a permitted activity) and does not provide information on the lighting proposed within reserves. Appropriate assessment of the effects of lighting within the proposed reserves, therefore, cannot be undertaken.
NOISE – Noise	
NOISE-R1 Activities generating noise, excluding construction activities and emergency and back-up generators	The additional information provided to the EPA sought consent under NOISE-R2. I acknowledge the Applicant has made clear that it intends the application to include this rule but I consider that, for clarity, the application documents should be updated to reflect that the land use consent now includes non-compliance with this rule.
SIGN – Signs	
All	The Masterplan and Landscape Urban Design Strategy identifies locations of proposed signage for the development. The SIGN chapter is not assessed in the application.
TEMP - Temporary Activities	
TEMP-R1 Temporary building and structures ancillary to a construction activity.	The application seeks consent under TEMP-R1 but provides no information on where and for how long the temporary construction buildings and structures will be in place. Section 17 of the Draft ECMP states that their type and location will be determined by the contractor. No conditions relate to the proposed non-compliance with TEMP-R1.
Area Specific Matters	
MRZ - Medium Density Residential Zone	
MRZ-R29 Primary production	MRZ-R29 makes primary production a non-complying activity. Farming activities are proposed to continue within Lot 5003. The application states that "all activities taking place have existing use rights". This is not established through any evidence provided with the application. The fact that the land use and buildings exist is not, in itself, evidence of existing use rights.
RLZ - Rural Lifestyle Zone	
All	No issues identified.
NCZ - Neighbourhood Centre Zone	
NCZ-R3 Retail activity and supermarket	NCZ-R3, relating to retail activity and supermarkets, and NCZ-R4 relating to commercial service activities, have been assessed by the applicant. It is not clear why these activities are assessed in the application, when no activities are proposed within proposed Lot 1000 (the commercial 'superlot'). Those

Rule	Comments
NCZ-R4 Commercial service activity	rules will be assessed when the lot is developed in the future. As such, the rules are not relevant to the application. While it will be addressed when development occurs on the lot, it is noted that residential Lot 254 is partially within the LCZ. Rule NCZ-R14 relates to residential activity within the zone. Standard NCZ-S5 requires residential units to be above ground floor. A future dwelling on Lot 254 may not meet the standard and may therefore require resource consent
DEV - NG - Northern Growth Development Area	
DEV-NG-R1 Activities (excluding subdivision) that are permitted activities in the underlying zone	DEV-NG-R1 relates to activities that are permitted activities in the underlying zone. The Applicant's assessment is that, as these activities would be enabled through the subdivision, consent is required and they will not be in accordance with the structure plan. However, as the activities are not actually part of the proposal, the rule is considered to not be relevant to the application.
DEV-NG-R3 Subdivision of land within the Northern Growth Development Area	In relation to DEV-NG-R3 the application incorrectly assesses DEV-NG-R3-1.a. The lots to be subdivided are greater than 3,000m² in area and therefore the proposal does not comply with the rule condition. This is a minor technicality, as the proposal is a discretionary activity under DEV-NG-R3-4.