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Comments on a Substantive Application under section 53 of the Fast-track Approvals Act 2024: Transport

Fast-track project name	Mt Welcome, Pukerua Bay, Porirua
Fast-track application no.	FTAA-2603-1181
PCC reference	RCO26120

Technical area	Transport
Date	30 July 2026
Author	Karthik Jagadish Kumar Aale
Statement of expertise	I hold a Master of Engineering Studies and Bachelor of Civil Engineering. I have over 5 years of experience in land development engineering and transport planning, including significant experience with local authorities in New Zealand
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 technical memorandum 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 Council has agreed to me preparing this report in accordance with the Code of Conduct.
Documents considered	I have reviewed the following documents submitted with the application: • Integrated transport Assessment (ITA) • Appendix E - Updated scheme plans 1753-02-1010 • Appendix H - Stantec memorandum dated 02 July 2026 • Appendix 30-19 - 1753-02-3000-R1-Roading-Overall • Appendix 30-20 - 1753-02-3100-R1-Roading-Detailed • Appendix 30-21 - 1753-02-3200-R1-Roading-Long-Sections • Appendix 30-22 - 1753-02-3300-R1-Roading-Cross-Sections • Appendix 30-23 - 1753-02-3600-R1-Roading-Driveways I have also considered the NGDA Structure Plan and wider provisions of the operative Porirua District Plan 2025.

Technical Review Comments

1. Introduction

My name is Karthik Jagadish Kumar Aale. I am employed as a Senior Transport Engineer for Porirua City Council (PCC).

I have reviewed the Integrated Transport Assessment (ITA), the transport plans, and scheme plan, and Stantec Memorandum for the Mt Welcome Development, along with the Northern Growth Development Area (NGDA) Structure Plan and wider provisions of the Porirua District Plan 2025.

The purpose of this technical memorandum is to provide a transport engineering perspective on the Mt Welcome project and associated ITA, highlighting areas where the proposal deviates from the intent of the NGDA transport network strategy and multimodal integration principles.

This memorandum specifically addresses the transport-related implications of the proposed Mt Welcome Development, focusing on potential areas of concern from a transport engineering and transport planning perspective.

I am authorised to provide this evidence on behalf of the Porirua City Council.

2. Discussion

Strategic Misalignment with the NGDA Structure Plan

Incomplete Implementation of the Planned Spine Road Network: The NGDA Structure Plan envisions an interconnected primary spine road with multiple links. The applicant's proposal delivers only one external connection to SH 59, deferring multiple internal southern transport connections and western walkway connection to Ara Harakeke indefinitely. This creates a single-access dependency, contradicting the NGDA objective of a resilient, multi-access urban structure.

Departure from NGDA Public Transport Integration: The Structure Plan depicts a collector spine road suitable for bus service introduction. However, the proposed alignment features grade exceedances of 11 - 12.5% and tight horizontal curves, which limit bus manoeuvrability and operational speed. Furthermore, the subdivision sequencing offers no guarantee of bus stop implementation timing. These issues will make future public transport structurally harder and less effective.

SH59 Access – Strategic and Safety Concerns

Single High-Speed Intersection: The NGDA transport model assumed an urbanised, low-speed SH 59 corridor with active crossings. The ITA's reliance on maintaining a 100 km/h state highway interface contradicts this strategic urbanisation intent. The proposed roundabout form and rural cross-section effectively create a high-speed barrier between the new suburb and the western side's Ara Harakeke regional shared path.

Staged Access Risks: The proposed interim T-intersection may operate acceptably for capacity but if it continues for several years under 100 km/h conditions with multiple construction vehicle movements would be contrary to PCC's safety hierarchy.

Active Mode Connectivity Deficiencies

Missing Integration with Ara Harakeke and Local Schools: The Structure Plan calls for seamless shared-path connections. The ITA states no safe or direct active crossing can be provided until the highway speed environment changes, effectively deferring the connection link indefinitely. This leaves the development without a legible walk/bike path to schools or the train station, undermining the Growth Strategy/neighbourhood vision.

Internal Gradient and Network Permeability: The collector and local roads exceed walkable gradients (>12.5%), and multiple long cul-de-sacs breach INF-S23 intent for permeability. In my view, the proposed mitigation of off-road trails are more recreational rather than functional. Where walking and cycling routes are indirect, steep and disconnected, people may not be able to use them to move through and out of a neighbourhood directly, safely, and conveniently without a car.

Network Effects and Wider Growth Integration

Model Scope Too Narrow: The Aimsun Next transport modelling area covers only SH 59 between Gray Street and Plimmerton, excluding longer-term NGDA dispersal via Grays Road, SH 58, and potential southward connections. This omission risks underestimating corridor interaction and mode shift outcomes when the full northern growth area builds out.

Lack of Coordination Mechanism: The ITA analyses Mt Welcome in near-isolation, lacking binding commitment to cost-share regional infrastructure (bus priority sections, SH 59 corridor upgrades, or active-mode connections).

Design Quality and Urban Form Issues

Urban Form Inconsistencies: The extensive cul-de-sac pattern contravenes the NGDA connected urban grid principle. Retaining a rural edge and limited active frontage to SH 59 ignores the Plan's urban-gateway policy. The heavy parking provision and car-oriented geometry are inconsistent with the strategic priority to build towards a low-carbon city and address climate change. There is also a lack of turning areas within the private JOAL's / ROW's.

3. Conclusion

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 proposal entrenches a single internal access, car-dependent enclave contrary to Porirua's growth and carbon-reduction objectives.

Aside from inconsistency with the NGDA, the issues identified are more fundamental issues from a transport planning perspective. The proposal does not create a well-connected, resilient, mode-supportive urban transport network. Instead, it risks locking in a pattern that is:

- car-dependent by design;
- physically weak for public transport;
- poorly permeable for walking and cycling;
- severed by a high-speed state highway interface; and
- insufficiently integrated with the wider transport network

A sound urban transport layout should give people realistic choices between driving, walking, cycling, and public transport. The proposal instead organises movement around the private car first, with other modes either deferred, constrained, or treated as secondary. This risks producing a development where driving is the only reliably/convenient mode for most trips. This is a poor outcome because it increases trip concentration at one access, reduces travel choice, and tends to worsen congestion, emissions, and household transport costs over time.

In my view, the Mt Welcome proposal should be required to demonstrate alignment with the Structure Plan's multimodal, connected, and resilient network framework. This is important not only as a matter of strategic consistency, but also to secure good transport outcomes in more fundamental terms.

4. Conditions

While conditions will not be able to address all of the matters identified above, I have included comments on the proposed conditions provided by the Applicant in Appendix 1 attached to this memorandum.

5. Recommendations to the Panel:

1. The proposal should be revised to coordinate with the NGDA Transport Master Plan confirming full-network staging, public transport integration, and corridor re-classification outcomes for SH 59.
2. Require a revised access strategy consistent with an eventual low-speed SH 59 corridor, with active crossing design included.
3. Require at least one additional internal transport connection to the adjoining Skaiffe Block (Part Haukopua East Block). The location of the western Transport Connection shown on the Structure Plan would be most beneficial as it would form a collector loop road and could serve as a bus route.

Appendix 1: Comments on Applicant's Proposed Conditions

Condition 23: The Construction Traffic Management Plan should include a complaints management procedure.

Condition 31: More detailed condition for the roading detailed design for certification through engineering approval should be included as below:

Roading Detailed Design Approval

a) At least 20 working days prior to road construction works within a particular stage/s, Roading Detailed Design Plans must be prepared and submitted to the Manager Resource Consents and Monitoring for certification.

The Roading Detailed Design Plans must include the following:

- i. Locations of pavement markings and signage.*
- ii. Stormwater asset types and locations.*
- iii. Road reserve cross-section drawings and long-section drawings, including changes in gradients, K-values, and roading chainage.*
- iv. Pavement detailed design, including how the thickness and values have been calculated.*
- v. Any retaining structures within the road corridor/reserve.*
- vi. Street lightings (see Condition 63)*
- vii. Any other above ground assets within the road reserve.*
- viii. Provision for rubbish bin collection on JOALs. The detailed design plans must include tracking curves of refuse trucks showing entry, exit, and manoeuvring within the private lanes.*
- ix. All pedestrian ramps must have tactile pavers as recommended and required through the detailed design Safe System Audit.*

b) At least 20 working days prior to construction of new roads to be vested commences, the consent holder must submit a Quality Assurance (QA) Plan to Council for assessment and approval to the satisfaction of Manager Resource Consents and Monitoring. This QA Plan shall demonstrate what tests will be carried out, where, when and the results recorded to demonstrate that the designs have been met.

c) The Roading Detailed Design Plans must indicate:

- i. Sumps that are 1.0m away from vehicle crossings unless approved by the PCC Roading Team.*
- ii. At sumps the kerb must be standard height with overflow hatch, e.g. not a mountable kerb.*
- iii. Street light pole locations.*

d) No road construction works can commence until the Roading Detailed Design Plans have been certified by the Manager Resource Consents and Monitoring.

e) All road construction works must be undertaken in accordance with the certified Roading Detailed Design Plans.

Advice Note: For the avoidance of doubt, Roading Detailed Design Plans can be submitted for the entire site, or on a staged basis.

Condition 33: A concept stage safe system audit should also be required. Wording as below could be considered;

- a. Concept Stage Safe System Audit: During the concept design, a concept stage safe system audit shall be carried out in accordance with Waka Kotahi's Safe System Audit Guidelines 2022. This needs to include all forms of transport connections, including the new intersection to SH59.
- b. Detailed Design Stage Safe System Audit: Prior to the submission of detailed design engineering drawings, a detailed design stage safe system audit shall be carried out in accordance with Waka Kotahi's Safe System Audit Guidelines 2022. This needs to include all forms of transport connections, including the new intersection to SH59.
- c. Post Construction Stage Safe System Audit: A post construction safe system audit shall be carried out in accordance with Waka Kotahi's Safe System Audit Guidelines 2022. This needs to include all forms of transport connections, including the new intersection to SH59.

Condition 55: This condition should include the required standards and responsible manager. Proposed wording to achieve this is included below:

The consent holder must reinstate footpath, kerb and channel, road carriageway formation, street berm and urban/rural services where damage has been caused by the demolition and/or construction works associated with the subdivision or land use consent. The assets shall be reinstated in accordance with Porirua City Council's Code of Land Development and Subdivision Engineering at the expense of the consent holder and to the satisfaction of the Manager Resource Consents and Monitoring.

Condition 63: The proposed condition does not reference the relevant NZTA street lighting manuals. The plan should be provided prior to road construction works. A more detailed street lighting condition is needed. Proposed wording for such a condition is included below.

Street Lighting Plan

a) At least 20 working days prior to commencement of road construction works associated with road construction within a particular stage, the consent holder must submit a Street Lighting Plan for certification by the Manager Resource Consents and Monitoring.

The Street Lighting Plan must include but not be limited to:

- i. Street lighting poles and luminaires must be designed to NZTA M26 and M30 requirements and in accordance with NZS 1158.3.1:2020.*
- ii. Street lighting along all JOALs;*
- iii. The lighting of intersections;*
- iv. Details to demonstrate that the lighting layout has taken into account the location of street trees, so that street trees do not restrict light spill;*

b) No civil works associated with road construction at each stage of the development shall commence until the associated Street Lighting Plan has been certified by the Manager Resource Consents and Monitoring.

c) The street lighting must be implemented at each stage of development, in accordance with the certified Street Lighting Plan/s.

Advice Note: For the avoidance of doubt, Road Street Lighting Plans can be submitted for the entire site, or on a staged basis.

Condition 76: The requirements for as-builts documentation and certification should include an additional clause requiring as-builts for all transport assets and line markings within road reserve for the development, including vehicle crossings.

Condition 82: To maintain consistency across application, and align with the new asset management platform, this condition should be re-named as RAMM / AWM and amended as below.

The consent holder shall submit certified RAMM data for all new/upgraded Roadway infrastructure prepared by a suitably qualified person in accordance with Council's As-built data requirements 2020 Edition to the satisfaction of the Manager Resource Consents and Monitoring.

- i. COC and ROI documents shall be provided for all street lights,*
- ii. Warranty documents shall be transferred to council for all street lights installed,*
- iii. All street lights shall be lived,*
- iv. The results of a circuit continuity test, undertaken by a Wellington Electricity approved contractor, conducted no sooner than four weeks prior to applying for s224 certification shall be provided to Council. The test results shall confirm that there is circuit continuity.*