

FTAA-2603-1181

Under the Fast-track Approvals Act 2024

In the matter of Mt Welcome, Pukerua Bay

By Pukerua Property Group Limited Partnership

RESPONSE OF PORIRUA CITY COUNCIL TO MINUTE 3 OF THE PANEL CONVENER

MT WELCOME, PUKERUA BAY

10 June 2026



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MAY IT PLEASE THE PANEL CONVENER

1. This memorandum is provided on behalf of Porirua City Council (**PCC**) in response to Minute 3 of the Panel Convener dated 27 May 2026 (**Minute**), regarding post-conference summary and directions, and the associated response of the Applicant to Minute 3 dated 4 June 2026 (**Applicant's Response**).
2. Paragraph 27 of the Minute directs:

Following receipt of the Applicant's memorandum, I further direct GWRC and PCC to provide short memoranda confirming the extent to which the Applicant has addressed and/or resolved the information sufficiency issues that they raised at the conference. Their memoranda should be filed with the EPA and circulated contemporaneously to the other conference participants by 5pm on Wednesday 10 June 2026.
3. This memorandum responds to that direction.
4. PCC notes that in principle it supports development on this site. Discussions with the Applicant have been held to resolve issues as efficiently as possible in the timeframe. These discussions will continue, and PCC is willing to work collaboratively with the Applicant to try to resolve any disputed information requirements.

Information sufficiency

5. PCC considers that the Applicant's Response leaves information gaps unfilled. After discussion with the Applicant, PCC acknowledges that the lack of information in some instances may ultimately reflect an area of disagreement on the merits of the Application, rather than an outright information gap. However, without further information being provided, PCC is concerned that it will be difficult to resolve potential disagreements through the consenting process, and in subsequent monitoring and compliance processes if consent is granted.

6. The information sufficiency issues discussed at the Panel Convener Conference focused on matters identified as key substantive issues that PCC will likely comment on when written comments are requested by the panel, as identified in PCC's Memorandum in response to Minute 2 of the Panel Convenor dated 19 May 2026 (**Conference Memorandum**).
7. A range of other matters were also raised in the earlier comments provided by PCC to the EPA on scope and completeness of the application. However, for brevity, comments in this memorandum focus on the key substantive issues. These matters are addressed in more detail in **Appendix A** to this response.
8. Where relevant, the comments in **Appendix A** have been based on review inputs from technical experts.

Consents required

9. In its Conference Memorandum, and at the Panel Convener's Conference, PCC raised concerns regarding the potential for additional consents to be required that were not included in the Application. PCC continues to hold these concerns. Certainty is required in relation to the consents that are necessary in order to inform the information requirements and appropriate consent conditions.
10. PCC has prepared high level comments on the district plan rules and standards that apply to the Application, attached at **Appendix B**. These comments are based on the information currently available.
11. It is recognised that, with a large development of this kind, there may be additional consents required during the development process; if necessary, these will be dealt with at the time. Meanwhile, PCC is happy to continue to work with the Applicant to identify all necessary resource consents required under the Porirua District Plan 2025 to ensure the need for later additional consents is minimised.

12. While PCC has prepared high level comments in **Appendix B** to highlight potential areas of concern, further information and assessment may be required.

Consent level design versus detailed design

13. In many instances the responses provided by the Applicant state that detailed design is proposed to be provided at a later stage through conditions. Generally, PCC agrees that detailed design can be provided, and is appropriate to be provided, at those later stages.
14. However, while some detailed design may be dealt with at later stages via conditions, an appropriate level of design and information relating to the proposed activities must be included with the initial application to enable a proper assessment of those activities and their effects.
15. PCC remains concerned that in some instances, as identified in **Appendix A**, an insufficient level of design has been included in the initial application.

Next steps

16. PCC is willing to engage directly with the panel and the Applicant as necessary to advance progress of the application efficiently through the fast-track process.

Dated: 10 June 2026



Hamish Harwood / Jack Apperley
Porirua City Council

Appendix A Detailed comments

Urban/Subdivision Design

1. PCC's Conference Memorandum identified the nature, location and layout of the recreational, commercial and residential land uses proposed, as a topic PCC will likely comment on. PCC's scope and completeness comments to the EPA specifically identified the assessment of urban design effects as a gap in the application.
2. PCC remains of this view. The Applicant's Response to this point (in Appendix A to the Applicant's Response) does not provide any further information or identify relevant information already within the Application that addresses the information gap identified by PCC.
3. PCC disagrees with the assertions in the Applicant's Response relating to the role of urban design as a discipline and in applications such as this. The points raised by the Applicant will be addressed further in PCC's written comments.
4. By not providing an urban design assessment PCC considers the Mt Welcome application lacks detail that would be expected in an application of this sort to enable a proper assessment of the Application's effects.
5. To highlight the role of such assessments, PCC has undertaken 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.¹ Of the 17 projects for which the application documents were available, 16 included an urban design assessment.

Wastewater infrastructure

6. Technical experts for Wellington Water have reviewed the Applicant's Response and have advised PCC that no significant additional information

¹ This was undertaken on 5 June 2026 using the Fast-Track website project search tool and included 'approved', 'in progress' and 'suspended' applications.

has been provided to address the concerns raised by PCC. As such, the Applicant's Response does not resolve the wastewater infrastructure information issues raised by PCC.

7. For clarity, PCC considers that the proposed wastewater servicing strategy and modelling does not:
 - address the wastewater capacity constraints within the existing catchment;
 - demonstrate that the Mt Welcome development will not exacerbate or result in additional wastewater discharges; or
 - provide sufficient information to demonstrate how and when mitigation will be implemented.
8. While PCC acknowledges that some of these concerns may ultimately reflect areas of disagreement, in its current state PCC does not consider the Application contains sufficient information addressing these matters to determine whether any disagreement exists, and if so the nature of such disagreement.
9. As an example of these concerns, PCC refers to the references in the Applicant's Response to a wastewater storage volume at Pumpstation 1 (**PS1**) of 688 cubic metres. The Civil Infrastructure Report, while discussing options of between 380 and 1940 cubic metres of wastewater storage mitigation, does not include a 688 cubic metre storage tank scenario.
10. It appears that the response may be relying on scenario 'v34' in Table 14 of the Wastewater Hydraulic Model Report. It is not clear in the application that this is the proposed wastewater mitigation solution.
11. Further, the area provided on Lot 1300 for the wastewater storage tank is only 350 square metres. This area is constrained on the lot by the location of stormwater infrastructure. The cross-section of the underground PS1 storage tank shows that it has a total vertical dimension of approximately 2.5 metres, providing for a total volume of the tank structure of 875 cubic metres. Given the need to include within that envelope the structural

elements of the tank and freeboard, it is not clear how a storage volume of 688 cubic metres will be achieved within the allocated space.

Stormwater infrastructure

- 12.** Technical experts for Wellington Water have reviewed the Applicant's Response and have advised PCC that no significant additional information has been provided to address the concerns raised by PCC. As such, the response does not resolve the stormwater infrastructure information issues raised by PCC.
- 13.** Neither of the stormwater treatment and retention matters raised by PCC have been resolved. Both issues reflect the underlying concern that the application documents are structured to justify a preferred design outcome, rather than demonstrating that a Water Sensitive Urban Design (WSUD) constraints-and-opportunities process has been followed.
- 14.** The two key issues relating to stormwater treatment and hydrological retention remain:

 - raingarden sizing based on potentially optimistic permeability assumptions; and
 - an absence of a genuine options assessment for hydrological retention.
- 15.** Further, in relation to the 'retention wetland' bunds, the Applicant's Response states that:

The design of the bunds is outlined in the plans: Appendix 30-26 - 1753-02-4300-R2-Drainage-Wetlands. Council has oversight over design through proposed conditions of consent (refer conditions 30 and 94).
- 16.** PCC does not consider that Appendix 30-26 provides a design of the bunds. The drawings in Appendix 30-26 do not provide cross-sections of the bunds, but rather the proposed outlet pipes. No information is provided on the basis of the design of the bunds, the material to be used, the dimensions, the maximum or minimum slope angles, or what the surface will be. While some information is provided in the Applicant's Geotechnical Investigation

report, this is not included on the design itself and may not accurately reflect the proposed design. Without this information the assessment of the effects of the proposal, including any risk analysis of failure, cannot be undertaken.

- 17.** While proposed conditions 30 and 94 provide for certification of detailed design and a completion report, as addressed in the body of this response this does not address the need for appropriate designs to be provided at the outset to enable an assessment of the effects for consenting purposes.

Water supply

- 18.** PCC raised in its Conference Memorandum that the Applicant has assumed that the existing Pukerua Bay water reservoir has greater capacity to supply Mt Welcome than it really does. PCC acknowledges that this may ultimately be a disagreement on the merits of the proposed solution for water supply, rather than a clear information gap issue and may be able to be resolved through conditions on development staging.

- 19.** The Applicant's Response states that the reservoir has capacity for approximately 326 lots. This is generally correct, as there is about 0.8 megalitres of spare capacity available – noting that the reservoir only has sufficient pressure below RL100 metres. However, the Applicant goes on to state that:

Allowing for 46 lots planned for the Muri Road development and a 44-lot allowance for infill development within Pukerua Bay. Approximately 236 lots remain available for Mt Welcome (assuming this future growth is fully realised).

- 20.** The consent for the 'Muri Road' development, also known as 'Muri Road Stage 1', provides for a total of 82 lots to be supplied from the existing Pukerua Bay reservoir rather than the 46 stated by the Applicant. As such, there is only capacity for Mt Welcome to connect 200 residential lots to Pukerua Bay reservoir.

- 21.** In addition to the issues identified in PCC's Conference Memorandum, Wellington Water has also advised that it has concerns that the application does not:
- address capacity constraints in the existing bulk water supply main;
 - demonstrate network resiliency; or
 - include any water saving measures (such as on-lot rainwater harvesting).
- 22.** As these have not been addressed in the Application, PCC also considers them to be information gaps.

Geotechnical

- 23.** PCC's geotechnical advisors (Tokin and Taylor (**T&T**)) reviewed the applicant's Geotechnical Investigation report and concluded that insufficient geotechnical and earthworks information had been provided to enable a resource consent for the proposed subdivision to be granted and that additional information is required to enable an informed decision on the suitability of the site for residential development. Comments on the additional information required were provided to the Applicant following comments being provided to the EPA on scope and completeness.
- 24.** T&T have reviewed Appendix D of the Applicant's Response, which responds to the additional information requirements, and have advised that there are some information requirement matters that have been resolved (matter 22, as numbered in Appendix D) or are considered able to be addressed through appropriate conditions (matters 6-11 and 13-18). However, there remain a number of matters for which PCC considers further information is needed (matters 1-5, 12, 19-21). A high-level written reply to the Applicant's geotechnical response has been prepared by T&T and will be provided directly to the Applicant.
- 25.** As such, PCC considers that the response partially resolves the geotechnical information issues raised by PCC, but there remain outstanding unresolved issues.

Transportation

- 26.** PCC's Conference Memorandum identified a range of transportation matters that will be addressed through written comments. Three of these do not specifically relate to information sufficiency issues, but rather the merits of the proposal itself, being:
- design of the roundabout and State Highway 59 interface and traffic effects;
 - adequacy of active modes and shared travel pathways within the site; and
 - road design and engineering standards.
- 27.** The remaining matters relate to information sufficiency issues, being:
- design of public walking tracks including connecting into the existing walking and cycle path on the west of SH59;
 - provision of public transport including bus stops and connection to the bus network; and
 - vehicle crossings for individual lots
- 28.** The additional information provided within the Applicant's Response does not sufficiently address the concerns raised by PCC. As such, PCC considers the response does not resolve these transportation issues raised by PCC.
- 29.** In relation to vehicle crossings, the Applicant has provided an additional 'Transport Memorandum' document. PCC does not consider this sufficiently addresses the concerns raised. The memorandum does not identify specific lots that will not be able, or will potentially not be able, to comply with the district plan standards for vehicle crossings. This does not allow the actual and potential effects of non-compliance with the district plan standards to be adequately assessed.

Electricity and telecommunication infrastructure

- 30.** The Applicant's Response refers to the Infrastructure Report for information on how electricity and telecommunications infrastructure is to be delivered. However, the Infrastructure Report does not provide this information.
- 31.** In relation to telecommunications, the report provides initial high-level assessments from telecommunication providers which state that the existing fibre infrastructure along SH59 is sufficient to service the site. How this is to be achieved within the site is not discussed.
- 32.** While the response does not resolve the telecommunication infrastructure issues raised, PCC considers that that these matters could be resolved by the Applicant including a description of the proposed telecommunication infrastructure in the application. This matter could potentially be covered by appropriate consent conditions.
- 33.** PCC considers that the issues with the proposed electricity infrastructure information are more significant. The Infrastructure Report notes that network 'reinforcement' is required, without specifying what this is. However, again, it is considered that this could potentially be resolved by consent conditions requiring additional plans providing for potential network reinforcement options within the proposed development along with a description of the provision of network connections to each allotment.

Natural hazards

- 34.** Subject to the information in the Geotechnical Investigation being provided on geohazards as advised by T&T above, PCC accepts that the application provides sufficient information on natural hazards.
- 35.** However, additional detailed information is likely to need to be provided through the consenting process and developing conditions for the consents to ensure that the proposed development appropriately manages any potential adverse effects, including downstream flooding effects.

Parks and reserves

- 36.** The Applicant's response does not resolve the issues raised by PCC in relation to parks and reserves. PCC considers that that the Landscape and Ecology Plans do not provide sufficient detail in relation to parks and reserves for the consent process. The information in the Masterplan and Landscape Urban Design Strategy is not specific enough to provide assurance that the proposed outcomes will be achieved. However, this matter could potentially be covered by appropriate consent conditions.

Terrestrial ecology

- 37.** Wildlands has reviewed the Applicant's Response and provided the high-level summary below to PCC:

The applicant has not provided sufficient information to ensure that management at the site will result in less than minor ecological effects.

The matters we have raised regarding missing information and inappropriate management do not reflect differences in professional opinion to the appropriateness of the proposed development. The matters raised instead reflect concern that the development may result in overall negative effects for indigenous biodiversity, and a net loss of indigenous biodiversity contravenes the principles of the NPS-IB (2023). Direct harm or death to indigenous fauna would also contravene the Wildlife Act (1953). We provide guidance below on how these potential negative effects can be managed.

- 38.** As such, PCC considers the Applicant's Response does not resolve the terrestrial ecology issues raised by PCC.
- 39.** Wildlands has provided more detailed comments on the required information to PCC, including the guidance noted in the last sentence of the summary above. The detailed comments include matters relating to vegetation clearance, bats, birds and specific concerns regarding lizard management. For brevity, those detailed comments are not repeated here, but will be provided directly to the Applicant.

Noise effects

- 40.** PCC notes that its comments on construction noise have been taken on board by the Applicant and a Construction Noise and Vibration Assessment has been provided. PCC appreciates this additional information and is commissioning a peer review of that report which is ongoing. On the face of it, this assessment appears to provide a sufficient level of information in relation to construction noise. As such, the Applicant's Response resolves the construction noise issues raised by PCC.
- 41.** However, the Applicant's Response does not address the potential reverse-sensitivity effects in relation to the existing activities that will continue on parts of the site and the proposed new urban development. Specifically, the Preliminary Site Investigation (PSI) provided with the Application identifies a helipad and hanger on the property that is proposed to become Lot 5003. The identified helipad is approximately 50 metres from the nearest proposed residential allotment. No information regarding these potential reverse-sensitivity effects has been included.

Consent Conditions

- 42.** PCC disagrees with the statement in Applicant's Response that the proposed conditions provide a "comprehensive framework for managing and monitoring effects, including certification, compliance monitoring, and enforcement mechanisms". The Applicant's Response does not resolve the consent conditions issues raised by PCC.
- 43.** PCC acknowledges that this may ultimately be more reflective of a disagreement on the merits of the Application, rather than an outright information gap. However, as noted in PCC's Conference Memorandum, it is anticipated that preparing appropriate conditions may be an extensive and potentially time-consuming exercise.
- 44.** PCC will continue to work with the Applicant on an appropriate set of conditions.

Appendix B Consent requirements

Comments on the Applicant's assessment of Porirua District Plan 2025 rules and standards	
Relevant Chapter	PCC comments
INF - Infrastructure	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-R26 relates to infrastructure not otherwise provided for or subject to any other rule in the 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-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. The Applicant has stated verbally that electricity lines will be undergrounded; this should be reflected in the application documentation for clarity. INF-R38 has been assessed in the application in relation to the upgrades of main trunk wastewater infrastructure which is within SNA027. However, assessment of the compliance with the relevant standards is incomplete, specifically in relation to INF-S18 and INF-S20. INF-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. 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

Comments on the Applicant's assessment of Porirua District Plan 2025 rules and standards

Relevant Chapter	PCC comments
	may make those section of realignment new infrastructure, rather than upgrading. This would affect the relevant rules and standards that need to be assessed. 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 bulk wastewater main upgrade. 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 trigger this rule. The additional information provided to the EPA sought consent under INF-R2. PCC acknowledges the Applicant has made clear that it intends the application to include this rule but considers that, for clarity, the application documents should be updated to reflect it.
TR - Transport	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 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.
THWT – Three Waters	THWT-R1 included in the Applicant's assessment, which states that compliance is achieved. It is understood that there are areas of the proposed subdivision that will not be serviced by attenuating stormwater infrastructure (the 'retention wetlands'), and therefore this rule would apply to those areas. This is not explained in the applicant's assessment. However, it is not clear why this rule has been assessed in the applicant 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.
NH - Natural Hazards	NH-R6, NH-R7 and NH-R8 are included in the Applicant's assessment and are identified as 'not applicable'. This is correct as no Hazard-Sensitive Activities or Potentially-Hazard-Sensitive Activities are proposed as part of the development. PCC notes, however, that these rules may become relevant in the future when the allotments are developed.

Comments on the Applicant's assessment of Porirua District Plan 2025 rules and standards	
Relevant Chapter	PCC comments
NATC - Natural Character	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 structure (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 has been assessed, 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.
ECO - Ecosystems and Indigenous Biodiversity	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.
SUB - Subdivision	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, 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 recreation reserve. Recreation reserves are not infrastructure and therefore do not fall under this rule. 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

Comments on the Applicant's assessment of Porirua District Plan 2025 rules and standards	
Relevant Chapter	PCC comments
	– 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.
EW - 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 undertaken.
LIGHT - Light	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	The additional information provided to the EPA sought consent under NOISE-R2 . PCC acknowledges the Applicant has made clear that it intends the application to include this rule but considers that, for clarity, the application documents should be updated to reflect it.
SIGN - Signs	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	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.
MRZ - Medium Density Residential Zone	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.
NCZ - Neighbourhood Centre Zone	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

Comments on the Applicant's assessment of Porirua District Plan 2025 rules and standards	
Relevant Chapter	PCC comments
	'superlot'). Those 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.
RLZ - Rural Lifestyle Zone	No issues identified at this stage.
DEV - NG - Northern Growth Development Area	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. 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.