

Response ID ANON-URZ4-5F7Z-1

Submitted to Fast-track approval applications
Submitted on 2024-05-02 20:07:03

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
KM and MG Holdings Limited

2 Contact person

Contact person name:
Aaron Portland

3 What is your job title

Job title:
Development Manager

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

30 Somme Road, Trentham, Upper Hutt 5018

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

18 State Highway 59, Plimmerton, Porirua.

Refer attached:
- Development concept plans (includes site aerial)
- Development staging plans

File upload:

Plimmerton Farm Development Concept_V2.pdf was uploaded

Upload file here:

Staging Plan and Development Programme.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Record of Title.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

KM and MG Holdings Limited.

With respect to the existing Record of Title, the Site is currently held in one title being Lot 2 DP 489799. The consented Mo Street subdivision seeks to subdivide Lot 2 DP 489799 with the balance of the development to be held as a balance Lot 100. Therefore, the subdivision proposed in the Stage One fast track consent application currently being considered by an Expert Conferencing Panel will subdivide the balance lot created via the Mo Street subdivision consent.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

The Applicant is the legal owner of the entire Plimmerton Farm site.

Section 2: Project details

What is the project name?

Please write your answer here:

Plimmerton Farm

What is the project summary?

Please write your answer here:

Located within the Porirua Northern Growth Area, and 'live-zoned' for residential and urban development through a Streamlined Planning Process (SPP) plan change process that occurred between 2019-2022, the Plimmerton Farm development will deliver approximately 2,400 allotments/houses, that would be accompanied by a commercial area, retirement village, and a school that would be dispersed through a network of public spaces within and adjacent to large tracts of restored and enhanced native vegetation, high value wetlands and streams. The Proposal also includes on-site flood mitigation to alleviate existing flooding issues in the downstream catchment, as well as new water reservoirs and improved pedestrian and cycle connections to the Plimmerton Village and Rail Station.

What are the project details?

Please write your answer here:

The development Plimmerton Farm site capitalises on its prime location, connecting to an established residential neighborhood, public transportation, and Plimmerton Village. The development will offer a diverse range of housing options, including standalone homes, semi-detached dwellings, terrace houses, apartments units and larger lifestyle properties in precincts B and C. It establishes development precincts that are set around expansive proposed scenic reserves that embrace the site's ecological heritage. Public open spaces are integrated with the adjacent residential environment and connect to an extensive trail network within the scenic reserves, providing a variety of recreational opportunities.

The development also seeks to provide critical community infrastructure through providing for commercial activities, a retirement village, and a primary school.

With a strong emphasis on the enhancement of ecological values, while some wetlands and streams will be reclaimed, the development aims to restore and enhance retained wetlands, streams, and significant natural areas. The focal point of this development will be the establishment of a substantial natural wetland in the lower-lying section of the Site. By incorporating on-site stormwater treatment/flood storage within the development areas, the new wetland area will look, act and function like a natural wetland. The wetland will also provide an important flood storage function that seeks to mitigate flood risk within the Site as well as assisting in remedying existing flooding of downstream properties.

The development comprehensively addresses the impact of climate change across all its stages. Erosion and sediment control measures implemented during the earthworks stage will be upsized to accommodate larger storm events. The proposed subdivision and road design prioritise multi and micro-modal transportation, which includes enhanced access across St Andrews Road / SH59. The subdivision block layout and building orientation has

been planned to maximise sunlight exposure and create opportunities for future solar power generation. As the developer and future housebuilder the Applicant is investigating designing and constructing the dwellings to ensure the roof structures can support potential solar panels.

The design and delivery of the proposed infrastructure also considers community resilience. This includes replacing critical electricity assets from an area of James Street susceptible to inundation and flooding and constructing new electricity assets within the Stage One area. Additionally, the sizing of the proposed water reservoirs takes into account existing capacity and resilience issues with emergency storage in the wider Cambourne area, and has been designed to accommodate future development within the wider Porirua Northern Growth Area.

The development will retain, restore and enhance wetlands, streams and SNA's with approximately 50% of the site being retained as open space.

At a subdivision layout level, the development has been guided by the following high-level design principles:

- maximise the potential of the site given its location relative to public transport infrastructure while respecting its inherent natural ecology and landscape and capacity to absorb change
- manage potential ecological and visual effects and integrate built form with the wider natural landscape to promote its health and diversity
- promote connections across all modes
- maximise outlook, amenity and identity derived from primary vegetated drainage corridors and wetlands
- maximise solar gain and coastal views
- balance density/yield with maintenance and enhancement of ecological values including the retention of significant areas of wetland habitat and through wetland restoration and creation
- undertake necessary earth modification and minimise secondary earthworks
- establish clear ownership and maintenance of open spaces, avoiding any "left over" spaces
- provide variety and flexibility with respect to site size and house types
- provide a mix of single, two, three and four level building forms
- maximise street parking and tree planting, especially on boulevard roads

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

The entire project is expected to be completed over 20+ civils stages (dependent on market conditions). The project will be split into three main stages (being Stages 1 – 3), with earthworks and development within each stage broken down into further earthworks sub-stages to appropriately manage environmental effects. Earthworks staging with accord with the Plimmerton Farm Erosion and Sediment Control Principles that specify maximum extents of open/exposed earthworks areas.

From 2026 the Applicant aims to deliver approximately 150 dwellings to the market every year to 2035 with earthworks being advanced a year ahead of construction programmes.

Refer programme attached to this application.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Porirua City Council
Greater Wellington Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

The application to refer Stage One of the Plimmerton Farm development to the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act), was approved and the Stage One fast track consent application was lodged on the 8th of December 2023 and on the 15 December 2023, the EPA determined that the application complied with the requirements set out in clause 3, Schedule 6 of the Act and the referral order, and provided it to the panel appointed to determine the application. The Plimmerton Farm Expert Conferencing Panel has just been appointed with a site visit scheduled for next week

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

The Applicant is the landowner.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

If consent is obtained for Stage One under the current fast track application that was applied for under the Covid 19 Recovery (Fast Track Consenting) Act house construction will commence in early 2026.

The project will be split into three main stages (being Stages 1 – 3), with earthworks and development within each stage, staged to appropriately manage environmental effects.

From 2026 the Applicant aims to deliver approximately 150 dwellings to the market every year to 2035 with earthworks being advanced a year ahead of construction programmes.

Refer programme attached.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Ngāti Toa Rangitira
Porirua City Council
Greater Wellington Regional Council
Wellington Water
Waka Kotahi NZTA
Kainga Ora
Adjacent property owners

The development of Plimmerton Farm benefits from the thorough examination of evidence supporting the rezoning and the evidence and input of mana whenua, key stakeholders, the community and submitters. The Hearings Panel's review and assessment of submissions, along with the plan change itself, have played a crucial role in evaluating the merits of this application. Notably, the rezoning of Plimmerton Farm, recent in planning terms, underwent a comprehensive assessment aligned with prevailing national and regional policy directions, including the NPS-UD, NPS-FM, NES-F, RPS, and NRP. The level of detail in PC18 is significant, and reflects the fine-grained assessment of relevant issues which have in turn fed into a carefully integrated planning framework for the Site.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Ngāti Toa Rangitira:

Te Rūnanga o Toa Rangitira ("Te Rūnanga") is mana whenua in Porirua. Te Rūnanga is the mandated iwi authority for Ngāti Toa under the RMA and the trustee of the Ngāti Toa Post Settlement Governance Entity (the Toa Rangitira Trust). Recent engagement with Te Rūnanga has largely related to the Stage One proposal and has included a number of hui and a site visit that included members of Hongoeka Marae. Where possible, draft reports and consent conditions were sent to Te Rūnanga for advice, review and input. This included the Open Space Strategy, Stormwater Management Plan, Water Quality Assessment and Hydrology Assessment.

There exists a shared commitment to continue meaningful engagement on all aspects of the Plimmerton Farm Development. As set out in the letter provided by Ngāti Toa to support the Stage One application, the Applicant and Te Rūnanga has, and will continue to engage on a number of matters. Concurrently and separate to the EPA processing of the Stage One application, discussions will progress around the preparation and implementation of a Memorandum of Understanding ("MOU") that will set out engagement and future environmental work programmes agreed between the Applicant and Te Rūnanga. The MOU is intended on solidifying the shared commitment for collaboration, and to achieve the highest possible outcomes for te taiao and the community.

CIAs and letters of support in relation to the Stage One proposal can be provided upon request.

Porirua City Council:

Refer PCC letter of support provided with this application.

In addition to the very recent consultation specifically undertaken in relation to the Stage One proposal to which this application relates, it is important to acknowledge the significant amount of recent consultation undertaken as part of the SPP application and PC18 process.

As part of the Stage One consent extensive consultation has been undertaken with PCC on all levels including with Senior Executives and with Council Officers. Consultation at officer level has included:

- Consultation between the project engineers and officers with respect of vesting of roads, walkways and the stormwater attenuation area and servicing including infrastructure provision to support existing infrastructure constraints and future PCC growth aspirations (i.e. being the wider Northern Growth Area)
- Meetings (including weekly design meetings) and site walkovers with the PCC Parks & City Services Team in relation to the proposed open spaces, streetscape planting and trail network.

A development agreement has nearly been agreed between the Applicant and PCC.

Lastly, PCC provided a letter of support for the Stage One application. This letter includes the following:

Porirua City Council is generally supportive of the Plimmerton Farms Stage 1 development infrastructure provision, alignment with growth intentions and intended housing outcomes based on the information provided to date.

Porirua City Council, during the referral process, provided commentary regarding the stage one proposal, included in our letter dated 12/04/2023 (attached). This commentary noted the need for the applicant to address the provision and design of three waters infrastructure and whether the site could be leveraged to address wider capacity constraints in the surrounding urban area. Porirua City Council considers that the applicant has

constructively worked with Porirua City Council to address the matters outlined in this letter. This includes working closely with Porirua City Council to achieve greater public benefits, particularly through the delivery of infrastructure to support the development (noting ongoing discussions will continue through the process and are likely to be the subject of conditions to any future consent).

Greater Wellington Regional Council:

As outlined, significant engagement occurred with GWRC through the SPP process. Recent engagement with GWRC has been with respect to the Stage One application. This has included:

- Site visits with GWRC planning, ecology, stormwater staff and advisors.
- Advice and clarification regarding whether the new NES-F regulations prevail over the Natural Resources Plan ("NRP") rules.
- Review of the draft Stormwater Management Plan and the MUSIC modelling data and follow up meetings.

Wellington Water Limited:

Regarding wastewater, WWL were involved in PC18, and through that process provided advice and input in relation to wastewater infrastructure requirements. Recent engagement and information provided with respect to the Stage One application includes:

- Meeting with WWL on the 4th of September 2023

- Feedback from O&M team relating to design of wastewater tank, including specifics on operational levels, flow control, flushing & ventilation

Regarding water supply, as noted earlier, WWL were involved in the PC18 at that time, were involved in determined potable water requirements for the Site. Key recent engagement and information includes:

- Meetings with WWL over September & October 2023 to provide project context, seek feedback, & discuss operations & maintenance requirements.
- Additional information on pressure zoning was provided 11 October 2023 for consideration

Joint Engagement – Stormwater Management

As part of the Stage One application, engagement has been undertaken with WWL, GWRC, PCC and Waka Kotahi regarding the proposed stormwater management strategy (for both Stage One and the wider Plimmerton Farm site) included:

- Project Overview and start up meeting, 6th September 2023, Porirua City Council, Wellington Water, engineer, applicant
- Discussion of stormwater philosophy, 26th September 2023, David Wilson (on behalf of Wellington Water), applicant, engineer, planner
- Discussion of flood modelling approach, 2nd November 2023, 10th November 2023 and 16th November 2023, Engineer and Wellington Water representatives
- Discussion of continuous simulation modelling approach and outcomes, 2nd November & 23rd November 2023, Engineer, Planner, Wellington Water representatives
- Site visit with GWRC representatives and Morphum Environmental, 14th November 2023

WWL were also provided the flood modelling and continuous simulation modelling technical details for formal review and the Stormwater Management Plan was provided to WWL and GWRC for review and comment.

Waka Kotahi

Formal correspondence was undertaken with Waka Kotahi as part of the plan change. Waka Kotahi submitted on the plan change but withdrew opposition to the plan change at the hearing stating that all concerns had been appropriately addressed or could be appropriately addressed through future consenting processes.

As part of the Stage One fast-track consent process correspondence has been undertaken with Waka Kotahi with respect of:

- The proposed wetland restoration and stormwater detention area;
- The extent of traffic generation modelling required along SH59;
- The sharing of tube count and modelling information;
- Access to and from the Site from James Street that is accessed via the roundabout within the Stage Highway 59 road corridor.
- The proposed pedestrian access across State Highway 1. A concept was sent to Waka Kotahi and updated to reflect comments received. The revised concept was sent back to Waka Kotahi for comment in early November and, at the time of writing, no additional feedback has been provided.

Ministry of Education

Correspondence with Ministry of Education ("MoE") staff in relation to the future primary school site has been ongoing for a number of years. Proposed Lot 603 within the Stage One proposal has been designed to ensure MoE requirements (that were provided to the project team by MoE staff) are met. MoE staff are also aware that the subdivision to create the future MoE school site is been applied for under the fast-track process and have provided a letter to accompany the Stage One application.

Kainga Ora

Kainga Ora has been engaging with KMMGH regarding the Plimmerton Farm site since 2020. As noted earlier, Kainga Ora and the landowner have entered into a land supply agreement for the Stage One project.

Adjacent landowners

The Plimmerton Farm development benefits from a significant amount of engagement that was undertaken as part of PC18 (including that with the wider community).

Following its decision to seek approval to use the SPP and the release of the decisions on the Growth Strategy, PCC commenced targeted public engagement on the PC18 and, more specifically, the Precinct Plan. This initially included the release of information on the intention to progress a plan change for Plimmerton Farm using the SPP and was followed by open days, the provision of material on PCC's website, newspaper articles and meetings with interested parties and identified stakeholders. Feedback forms seeking comment on the Precinct Plan were available at the open days and on PCC's website and an email address was created for members of the public to email with comments and questions. In addition, oral feedback and comments provided at the open days were captured and, together with written feedback, used to inform and refine the Precinct Plan.

With over 250 people attending the open days, the targeted engagement enabled a wide spectrum of the community to become familiar with the Precinct Plan and have an opportunity to inform the Precinct Plan.

Recent consultation has also been undertaken with individual property owners as part of the Stage One application.

Upload file here:

PCC letter of support Fast Track - Plimmerton Farms.pdf was uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

N/A

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Site falls within the area of interest covered by the Treaty settlement with Ngāti Toa. The Ngāti Toa Rangitira Claims Settlement Act 2014 gives effect to certain provisions of the deed of settlement signed by Ngāti Toa, Trustee of the Toa Rangitira Trust and the Crown on 7 December 2012 and an amendment deed signed in November 2013.

The post-settlement governance entity associated with the Ngāti Toa Rangitira Treaty settlement is the Toa Rangitira Trust. Te Rūnanga o Toa Rangitira Incorporated is the trustee of this trust.

The deed of settlement acknowledged that Ngāti Toa suffered injustices that impaired sufficient land for their present and future needs, and the pollution, reclamation and public works affected the cultural and spiritual well-being of Ngāti Toa.

The Treaty settlement provided redress to Ngāti Toa in the form of land, the right of first refusal of Crown lands, facilitation of ongoing relationships with government agencies, imposition of overlay classifications and statutory acknowledgements placed over land sites, place name changes and an apology from the Crown. The provisions of the settlement Act are also intended to enhance the ability of Ngāti Toa to give practical effect to kaitiaki responsibilities through increased participation in resource management processes.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

N/A

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

N/A

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

N/A

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

Yes

If yes, please explain:

As recommended by Ngati Toa Rangitira, the Plimmerton Farm Zone rules that were introduced via Plan Change 18 provide for customary harvesting as a Permitted Activity. Ngati Toa have access to the site to do this and this will be retained through the development.

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The assessment of environmental effects included in the Stage One application included an assessment of the following actual and potential effects:

- a) Positive effects;
- b) Economic effects;
- c) Social effects;
- d) Cultural effects;
- e) Urban design effects;
- f) Subdivision effects;
- g) Infrastructure and servicing effects;
- h) Natural hazard effects;
- i) Climate change effects;
- j) Traffic generation effects;
- k) Effects on ecological values
- l) Earthworks effects;
- m) Construction effects;
- n) Contamination effects;
- o) Landscape effects;
- p) Visual amenity effects;
- q) Internal residential amenity affects;
- r) Effects on adjacent properties; and
- s) Historical and archaeological effects.

Based on extensive technical assessments and analysis, the assessment in the Stage One application concluded that adverse effects of the Stage One proposal are considered to be less than minor, and minor on the environment (but not more than minor). Based on the highly collaborative and iterative masterplanning process and the technical assessments completed to date, it is considered that there is no potential for the development to have significant adverse environmental effects, and adverse effects will be avoided, remedied or mitigated and any residential effects will be readily managed through proffered conditions.

Upload file:

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

NZ Coastal Policy Statement

The land is not identified as being within the coastal environment and is not subject to the provisions of the NZ Coastal Policy Statement.

National Policy Statement for Freshwater Management

The Plimmerton Farm development will be consistent with the NPS-FM for the following reasons:

- The development includes significant offsetting, restoration, enhancement and protection works, to ensure no net loss in wetland and stream values and extent.
- The development seeks to avoid, minimise and mitigate its effects on ecosystems and waterbodies in a manner which give effects to Te Mana o te Wai, through careful design and integration between engineering, ecology and planning practises to ensure that sediment discharge is minimised and stormwater discharges are appropriately treated to protect the health of freshwater environments (including the downstream environments).
- Effects of the works which relate primarily to the control of stormwater and sediment have also been minimised. Best practice erosion and sediment controls will maintain the existing freshwater quality of the streams adjacent to the area of works and the downstream environments.
- The receiving environment is noted as being degraded by historic vegetation clearance and stock grazing. The stream environment is highly modified and are not identified as having outstanding values.
- Best practice stormwater management quantity and quality will ensure that the freshwater values of the receiving environment are maintained (and enhanced due to appropriate treatment and quantity control protecting from erosion). Specifically, the stormwater management response takes an integrated whole-of-catchment approach to avoiding, remedying and mitigating the adverse effects on the receiving environments. The bioretention devices will be used for treatment of contaminants, and detention (reducing erosion from increased quantity and velocities) will be provided the flood storage area, the enhanced stream corridors and through on lot devices.
- Potential adverse effects on stream habitat and ecology will be avoided, remedied and mitigated. When viewed in conjunction with the other aspects of the development, including stream enhancement works, the adverse effects of the stream works can be adequately mitigated and offset. In addition, the planting will not only provide for an enhanced natural environment through habitat values and enabling habitat for fauna, it will also result in a high level of amenity for people enjoying streamside reserves. Overall, the planting and restoration is considered to be a benefit to the wider area through an enhanced freshwater environment.
- The habitats of indigenous freshwater species will continue to be enhanced through habitat improvements such as the introduction of fish passage where it is currently impeded (including at Plimmerton Swamp East), as well as the enhancement of degraded stream corridors. These are positive outcomes given the significant damage that decades of farming activities have had on the stream network.
- The development will maintain the freshwater resources within the Site by ensuring no net loss in both values and extent. Regarding to the downstream

environment, the Water Quality Assessment confirms that there will likely be an improvement to water quality, and in turn, the health and well-being of the wider environment. In doing so, it protects the mauri of the wai and the freshwater will be managed in a way that gives effect to the principles of Te Mana o te Wai.

- The development aligns with the policy objectives of Policy 3.5 related to integrated management, recognising the interconnectedness of the environment. The development has been carefully planned to consider the broader environmental context, taking into account the various interconnected ecosystems and receiving environments. In this regard, the development includes measures that are included in the Proposal that avoid and minimize effects on downstream environments including, Taupō Stream, Te Awarua-o-Porirua Harbour and Taupō Swamp. The technical reports already completed for Stage One conclude that, potential adverse effects on these environments, including on the health and well-being of water bodies and freshwater ecosystems will be less than minor.
- Freshwater, land use, and development in catchments in an integrated and sustainable way. Robust environmental management practices are incorporated to avoid, remedy, or mitigate adverse effects, including cumulative effects, on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.
- The development integrates stormwater, ecological and recreation functions as the retained wetlands and stream corridors will become accessible through the development of the drainage reserves and shared paths will connect these spaces including the new natural wetland. This will enable future residents and the community to provide for their social, economic, and cultural well-being, now and in the future through these facilities.
- The engineering designs and reports prepared by Aurecon address climate change.
- The Applicant and its consultant team has consulted with Te Rūnanga and will continue to do so throughout the life of the development to ensure that the tangata whenua values and interests, including the principle of Te Mana o te Wai, are reflected in the outcomes associated with freshwater management.
- It is expected that consent conditions will include requirements for monitoring and maintenance of devices to ensure that the health and well-being of the freshwater environment is appropriately reported.

National Policy Statement on Urban Development

The National Policy Statement on Urban Development (NPS-UD) sets out the objectives and policies for planning for well-functioning urban environments under the Resource Management Act 1991. The Proposal is consistent with the objectives and policies in the NPS-UD. While the NPS-UD provides an overarching policy direction for proposals which provide significant development capacity it is acknowledged that, ultimately, the NPS-UD formed the basis for rezoning the site in 2022. This is clear from the extracts of the Panel Recommendation Report included for reference in the Stage One application (that can be provided upon request).

National Environmental Standards for Freshwater

The Stage One application is being considered against the requirements of Regulation 45C (restricted discretionary activities for urban development) of the National Environmental Standards for Freshwater (NES-F) and it is envisaged that this consent pathway will be utilised for the Stage 2 and Stage 3 applications.

National Policy Statement for Highly Productive Land

The land is zoned residential so the National Policy Statement for Highly Productive Land does not apply.

National Environmental Standard for assessing and managing contaminants in soil to protect human health

The National Environmental Standard for assessing and managing contaminants in soil to protect human health (NES-CS) is addressed in the Preliminary Site Investigation (PSI) Aurecon. That PSI recommended that a Detailed Site Investigation (DSI) be undertaken and that earthworks and development of the land could proceed in accordance with recommendations of the DSI.

File upload:

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

The Site has been identified as a growth area since 2009 and was recently the subject of a Council-led SPP that sought to rezone the Site as a key component in PCC's response to the shortfall in housing capacity in the City and increasing demand for a greater diversity of housing. While the SPP documentation notes that the first houses in Plimmerton Farm were expected to be completed in 2022, this was stalled through the prohibition of wetland reclamation in the NES-F.

Obtaining the requisite RMA approvals is the only remaining constraint on commencement and progression of this Proposal. As it provides a faster and more certain process for obtaining consent, use of the FTCA rather than the RMA will enable the Proposal to progress significantly faster than would otherwise be the case, with the resultant economic stimulus that would ensue.

The following matters have been considered when assessing suitability for this process, compared to the RMA process:

- Based on recent experience, the Mo Street application, a non-notified a 45-lot vacant subdivision, took 10 months to consent. This was largely due to routine exceedances of statutory timeframes currently occurring due to PCC workloads.
- Any decision by PCC or GWRC under the RMA would be subject to the appeals process which could add significant delays.
- The Applicant would likely be required to seek separate consents from both the PCC and GWRC. While the integrated nature of development on the Site favors a joint application, even if the application were lodged as a single application, correspondence with PCC and GWRC officers confirmed that the applications would be processed separately.

The use of the FTCA process will see development works commence in the last half of 2025. This can be contrasted with the process under the RMA. Specifically, while the intended development of the Site for housing has recently been confirmed in the District Plan through PC18 and PC19, realising

those aspirations through the RMA will be delayed through the consents required under the NES-F and NRP. In the best-case scenario, if approvals for the Proposal were progressed under the RMA, it would likely be at least 24 – 30 months before development could commence.

Ultimately, the land has been identified and earmarked for urban development through a range of local and central government processes, will deliver a well-functioning urban environment and will provide benefits for both housing supply and catchment management of the important Taupō Swamp catchment.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Referring the Plimmerton Farm development through the fast-track consenting process could greatly enhance the efficient operation of the approval procedure. Fast-tracking this project would expedite PCC and GWRC consenting processes, enabling timely approval and commencement of construction activities. The fast track process will therefore accelerate economic benefits, including job creation and infrastructural advancement (including flood mitigation works) which are crucial for local development and growth, and accelerate social benefits including the construction of new commercial services, significant new recreational opportunities and the construction of a new school.

Moreover, fast-tracking the Plimmerton Farm development aligns with the intended purpose of streamlining and expediting the rezoning of the site to assist in elevating short and medium term housing supply issues. Allowing Plimmerton Farm to progress through the fast track process signifies an ongoing commitment to efficient governance and responsiveness to community needs, ensuring that projects of significant public benefit can progress without undue delay.

Overall, fast-tracking the Plimmerton Farm development through the fast-track consenting process will bring about swift and tangible benefits, facilitating timely implementation while upholding the principles of efficient decision-making and responsive governance.

Has the project been identified as a priority project in a:

Central government plan or strategy

Please explain your answer here:

Plimmerton Farm has been identified in both Central and Local Government growth plans and strategies.

On the 25th of August 2022 Kainga Ora announced that the Northern Growth Area has been selected for assessment as a potential 'Specified Development Project' ("SDP"). While Plimmerton Farm is part of the Northern Growth Area it is, until recently, a landholding that has a 'live' residential zoning and has been subject to its own masterplanning process through the SPP. Therefore, while KMMGH supports the assessment and due-diligence work currently being undertaken by Kainga Ora, KMMGH's Development Manager has been clear that it intends on advancing development in accordance with site zoning and the Plimmerton Farm Precinct Plan. In other words, while KMMGH supports the SDP it also does not want to be delayed from advancing development and providing housing supply at scale at Plimmerton Farm at a pace that was expected through the SPP. KMMGH is ready to implement housing at scale as soon as any fast-track consenting is granted.

From a regional perspective, the recently adopted "Wellington Future Development Strategy 2024-2054" (an FDS as defined in the NPS-UD) identifies the Northern Growth Area as a "Priority Development Area", further establishing its regional significance. The identification of the Northern Growth Area, including Plimmerton Farm, sends a clear signal that local and central government consider the growth area to be a significant development area, and shows intent for the prioritisation of this area of the region as a significant development area.

Will the project deliver regionally or nationally significant infrastructure?

Regionally significant infrastructure

Please explain your answer here:

Objective 10 of the RPS seeks to ensure that the social, economic, cultural and environmental, benefits of regionally significant infrastructure are recognised and protected. Policy 7 of the RPS also seeks to recognize the social, economic, cultural and environmental benefits of regionally significant infrastructure, Policy 8 of the RPS seeks to protect regionally significant infrastructure, and Policy 39 seeks to recognise the benefits from renewable energy and regionally significant infrastructure.

There is an inherent acknowledgement in the RPS that regionally significant infrastructure can provide benefits both within and outside of the region. This includes, among other things, the social, economic, cultural and environmental benefits of energy generated from regionally significant infrastructure.

The development includes the new and extended regionally significant infrastructure including water supply, wastewater, stormwater and power infrastructure. At the request of PCC, the proposed water reservoir in Stage One has been sized to ensure community resilience by including sufficient emergency storage to account for the current shortfall in the wider Cambourne area. Also, the proposal includes new critical electricity assets that will replace existing assets from an area of James Street that is susceptible to flooding and slip hazard. This is a clear regional benefit. Wellington Electricity have identified that the new infrastructure within the development will also support KiwiRail upgrades to the Kapiti line rail corridor. This is a clear significant regional benefit.

With respect to stormwater and flood hazard management, the development includes stormwater assets that minimise existing flood hazard within the downstream catchment, including minimising flooding of the adjacent state highway network. This is a clear significant regional benefit.

Will the project:

increase the supply of housing, address housing needs, contribute to a well-functioning urban environment

Please explain your answer here:

In relation to housing supply, the Economic Assessment completed for the Stage One development (that includes approximately 30% of the total yield across the site) concludes:

- The development would increase the residential housing supply by providing approximately 2400 new dwellings to a market that has a significant shortage of housing.
- The development would provide significant additional housing within an affordable price range. The proposal therefore provides housing, most of which meets the market demand for affordable housing. This is a notable positive effect.
- The development helps to achieve Policy 1 of the NPS-UD as it increases the range of housing available to the market.
- The development would introduce more competition into the market in the short-medium term, increasing market efficiency and placing downward pressure on house prices.
- The proposal would contribute to the housing shortage over the 2024-2030 period and ensure there is a competitive land and development market, which has significant economic benefits for the district relating to access to suitable housing, in terms of location, type and price, for the current and future population.

Ultimately, district and national processes (including the SPP) undertaken over the last 15 years have identified that development of Plimmerton Farm forms a key component of PCC's response to the shortfall in housing capacity in the City. It also responds to an increasing demand for a greater diversity in housing. This was reflected in the feedback PCC received through engagement on the Growth Strategy, District Plan Review and PC18.

Based on the technical assessments undertaken to support the Stage One proposal, the development will contribute towards a well-functioning urban environment for the following reasons:

- The proposed housing typologies will meet the housing needs of different households, including affordable houses.
- It will enable future commercial activities that are suitable for different business sectors in terms of location and site size (refer Economic Assessment for further assessment).
- The development will make a notable contribution towards meeting the need for more new housing including detached, duplex, terrace and apartment typologies to enter the market, while increasing competition among developers. The proposal therefore supports and improves the competitive operation of land and development markets in Porirua and thus contributes towards meeting the provisions of Policy 1(d) (refer Economic Assessment for further assessment).
- The location and layout of the project, which integrates multi-modal transport choices, is intended to encourage alternative transport modes which will support reductions in greenhouse gas emissions.
- The development provides appropriate connectivity to adjacent urban areas as well as future opportunities for connections to adjacent sites and future precincts. Refer further assessment in the Integrated Transport Assessment.
- While the Site will be modified through earthworks and building construction, the proposal will result in a concentrated urban form surrounded by considerable areas of open space, including native bush within the SNA's at the Site.
- The development seeks to develop the site 'within environmental limits' via the significant biodiversity and natural environment enhancements through SNA protection, biodiversity offsetting and enhancement, and water quality initiatives that are intended to protect/enhance Te Awarua-Porirua Harbour and Taupō Swamp.
- In a financial sense, the Proposal will provide necessary infrastructure, roading and reserves, increase the patronage of public transport, making those facilities more efficient and/or enabling transport providers to provide additional services profitably (thereby increasing convenience for all patrons), and increase the customer base for local businesses.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The Economic Assessment prepared to support the Stage One proposal estimates that the construction of 590 dwellings would generate 845 FTE jobs and contribute \$113.5 million to construction sector GDP. In broad terms the direct and indirect impact each account for 50% of the total GDP and employment impact. As such, it is estimated that the construction of 590 dwellings would directly contribute an estimated 422-423 FTE jobs and \$56.7 million to construction sector GDP, and similarly, would indirectly contribute 422-423 FTE jobs and \$56.7 million to construction sector GDP.

Based on the findings of the Stage One Economic Assessment, the entire Plimmerton Farm development would generate 3,380 FTE jobs and contribute \$454 million to construction sector GDP.

Indirect benefits include supplies and services purchased by the construction team, or by contractors engaged by KMMGH. These include the wholesale and retail building supplies and building fit outs, civil construction supplies, and legal, telecommunications, administrative and accounting services. The vast majority of KMMGH's contractors and materials are locally sourced, ensuring that the benefits remain within the local economy. Other professional services, such as real estate and conveyancing services, are expected to benefit as housing is released into the market.

By utilising the process under the FTCA, the Proposal is anticipated to deliver the first dwellings by mid-2026, with earthworks and construction of infrastructure to commence shortly after consent is granted. This will enable financial benefits to flow into the local economy quicker. These figures amount to significant economic benefit for Porirua and for the Wellington region.

The Economic Assessment identifies that the economic impacts of the Proposal will include flow-on effects that arise indirectly from the development, these include:

- Salaries earned by local residents being spent on purchasing household goods and services, boosting the regional economy;
- Increased housing both through the provision of new housing in the development and the release of existing homes which are released back on the market;
- "New money" coming into the area as a result of the development;
- Increased household incomes flowing through the local community; and
- Possible increased visitor benefits.

The development will also result in a meaningful increase in the rating base of PCC and GWRC adding to the revenue of the City and Region to make for public services. The development will also provide the agreed development contributions.

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The potential emission of greenhouse gases has been considered in all stages of the development, as further described below.

Location and Connectivity

Of most importance, the development will contribute to New Zealand's efforts to mitigate climate change and transition more effectively to a low-emissions economy through its location and proposed density that will promote a consolidated urban form. Further, the provision of new and enhanced multi-modal connections to community infrastructure will reduce reliance on private vehicle travel, which, until the use of low-emissions or electric vehicles becomes more wide-spread, will be the primary contributor of emissions resulting from new development.

Furthermore, Plimmerton Farm is in close proximity to existing community infrastructure and employment opportunities as well as providing for these future activities within the development. The connections throughout the development have been designed to enable direct, safe access to these locations via active modes of transport and public transport, as and when that service can be provided to this area. By doing so, the development is anticipated to support a reduction in the extent of private car travel which might otherwise occur if the required additional housing capacity was delivered further afield (including other properties within the Northern Growth Area that have recently been rezoned). Again, on the assumption that fossil-fuel powered cars continue to dominate the market for the foreseeable future, any reduction in reliance on car travel will contribute to New Zealand's efforts to transition to a low-emissions economy. The provision of higher density development as part of the Proposal will also provide additional incentives for the future servicing of this area through public transport.

In terms of the subdivision layout, the subdivision block layout and siting and design of allotments and buildings has sought to maximise opportunities for solar gain, therefore contributing to energy efficiency.

In addition, the effects of climate change and the impacts of the development on this have been mitigated by provided substantial flood storage. The development includes the construction of a large wetland that will have a secondary function of flood storage. Flood modelling and detention design has been completed to demonstrate that peak runoff from the development area is reduced to approximately 50% of pre-development flows during both 10yr and 100yr storm events including allowance for climate change (being a 20% increase in rainfall). All other proposed stormwater infrastructure within the Site, including the pipe network and secondary flow paths, have been designed and sized in accordance with guidelines that require that allowances are made for sea level rise and climate change. The location of the flood storage basin is at an existing peat wetland. Peat wetlands are carbon sinks and restoration of this wetland will ensure it continues to function as such.

Earthworks and Sediment Control

The Plimmerton Farm Erosion and Sediment Control Principles were developed in response to the sensitive and important nature of the downstream receiving environment, and therefore the need for employing conservative design parameters for the sizing of erosion and sediment controls. A consequential effect of applying conservative and 'better than best practice' controls is that the controls will be responsive to climate change and resilient to rain events that are heavier, higher intensity, or more prolonged than expected. It will also add capacity and flexibility to manage potential sediment discharges from larger rainfall events than required regionally.

Building Construction

In terms of construction materials for the proposed dwellings, there is limited scope to avoid the use of greenhouse gas producing construction materials, such as concrete (particularly given PCC infrastructure requirements, NZS4404 and the requirements of the Building Code), whilst still delivering affordable housing.

However, by designing the development to optimise intensity, a greater amount of housing can be provided for equivalent concrete and building materials than would be the case with a standard residential development. More specifically, the development is predominantly medium density. Terrace housing is inherently more energy efficient than larger stand-alone houses due to the houses insulating one another through the shared use of party walls and reducing the external surface area available for heat loss.

Also, as both the developer and future housebuilder, the Applicant is investigating roof design for the potential for solar panels and provision of electricity car charging.

Residential Occupation

In terms of greenhouse gases from the development, when completed and people are living in it:

As outlined above, the location of the development and provision of multi-modal transport, seeks to minimise travel distances and the use of private vehicles.

The proposed residential density represents an efficient use of land close to public transport infrastructure which in turn supports the existing train services and provides incentives and opportunities for future bus service. The Site has good access to the local public transport network and convenience (including easy cycling access) to the Plimmerton rail station will be enhanced via the proposed SH59 crossing. Further, the main collector road has been designed to accommodate new bus stops. The proposed development has maximised opportunities for walking and cycling connections, thus minimising the reliance on private motor vehicles. Walking and cycling facilities are proposed within road reserves, and through key site features including the large areas of vested reserve. An extensive pedestrian and trail network is provided in the Open Space Strategy thereby providing good connectivity throughout Stage One. These factors will assist with the reduction of vehicle emissions as a consequence of an increase in density of development on the Site.

The development has sought to strike an appropriate balance between providing carparks and encouraging the use of alternative modes of transport. The train station and Plimmerton village is within easy cycling distance and there are appropriate connections to both. The southern part of the site is within walking distance to both.

By providing a range of typologies including smaller townhouses, people on a range of incomes will be able to live in new buildings which are designed and built to achieve modern insulation and energy efficiency standards. They will therefore use less energy to heat their homes and will be able to do so using less electricity (e.g., with heat pumps rather than inefficient heating sources).

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

There are a number of aspects of the Plimmerton Farm development that will strengthen resilience with respect to managing natural hazard risks and the effects of climate change.

In addition to the points already made about climate change above, resilience will be strengthened via:

- The development will accommodate existing flood flows that will mean that peak runoff from the development area will be reduced to approximately 50% of pre-development flows during storm events. This substantially reduces peak runoff from the site by about 50% and flood levels by 200mm at SH59 and around James Street and adjacent properties. The modelling has included considering bigger and longer rainfall events resulting from climate change. This provision of 'hydraulic positivity' will assist in strengthening environmental, economic and social resilience in terms of managing natural hazard and the effects of climate changes.
- Critical power infrastructure currently located on James Street in an area of inundation and slip risk will be removed and replaced with a new sub-station and switching station in Plimmerton Farm. The selected areas are clear of any flooding or geotechnical risk.
- Additional storage in the proposed wastewater tank is proposed to ensure flows do not have to be discharged in large storm events.
- The individual residential lots will have a level of resilience with the installation of rain collection tanks, such that, in the event of low, or no, rainfall, residents are provided with a water supply for external water use.
- The Applicant is exploring potential future opportunities for solar power generation on roof structures.

Will the project address significant environmental issues?

No

Please explain your answer here:

While consideration of effects is a fundamental requirement and feature of the New Zealand planning system which the Panel will be very familiar with, the term "adverse effects" in this case deserves focus. The RMA confirms that effects are to be considered regardless of scale, intensity, duration or frequency of the effect. Just because the scale of the Proposal is significant, it should not be inferred that associated "adverse" effects will be the same. To the contrary, the scale of the Proposal allows effects to be minimised and rationalised. Put simply, it is not necessarily the case that the bigger the project, the more significant the adverse effects will be.

There is no potential for the Proposal to have residual significant adverse environmental effects as has been made clear in the technical reports already completed for Stage One. Measures have been incorporated into the development to ensure residual significant adverse effects can be avoided and/or reduced to an acceptable level.

Such effects have already been avoided through the iterative and comprehensive masterplanning process as well as the adherence to the Precinct Plan including the freshwater principles and erosion and sediment control principles that were specifically developed to manage effects on downstream environments, the PC18 Panel stating that the PFZ planning framework includes "the highest possible standards for stormwater management and to address the potential adverse effects of sedimentation".

The masterplanning process that has been ongoing since 2019 has sought to further address adverse significant adverse effects via:

- Reducing the development and earthworks extent to avoid SNA's, wetlands and streams to the greatest extent possible. Full avoidance has included the removal of roads including the SH59 connection that would have required significant stream reclamation works, removal of roads and areas of development, and minor refinements to lot and block design.
- Managing stormwater discharges on-site in terms of both stormwater quality and quantity.

In relation to greenhouse gas emissions, the Proposal will not generate significant adverse effects. The provision of car parking combined with the proximity of the Plimmerton Village and Plimmerton Rail Station access and future commercial area, will assist in reducing the number of vehicles on roads, and associated emissions. Any other activities, such as wood burners, are required to comply with the standards set out in the NES for Air Quality.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Yes, inherently consistent.

The Site's potential for urban development has long been identified. In 2009 it was included as a "potential urban growth area" as part of the Porirua Development Framework (adopted by PCC in August 2009). The property also formed part of the Northern Growth Structure Plan that was adopted in 2014 and was confirmed as a growth area in the Porirua Growth Strategy 2048 ("the Growth Strategy").

In 2018, Plimmerton Developments Limited (a former entity that is now KMMGH) purchased Plimmerton Farm with the intention of rezoning the Site for predominantly residential and ecological enhancement purposes. Concurrently with early masterplanning and preparation of the Draft Plimmerton Farm Precinct Plan, the landowner engaged with PCC on its preparation of the Porirua Growth Strategy 2048 ("the Growth Strategy").

While Plimmerton Farm was one of several areas identified by PCC for future urban growth, to achieve housing outcomes in a timeframe that was responsive to significant housing need within Porirua City, PCC submitted an application to the Minister for the Environment to advance the rezoning of Plimmerton Farm via a Streamlined Plan Process ("SPP") on 1 October 2019. As outlined in the SPP application, the significant amount of work already undertaken by PDL to demonstrate feasible development capacity was a determining factor in PCC's decision to initiate the plan change ahead of its already planned District Plan review.

Environment Minister David Parker approved PC18 on the 26th of February 2021, being satisfied that his expectations and process requirements were met. The plan change was made operative on the 21st of May 2021.

The recently adopted Plan Change 19 ("PC19") also inserted the Medium Density Residential Standards and mandatory objectives and policies, as well as Policy 3 of the NPS-UD into the Plimmerton Farm Zone chapter. To implement the NPS-UD, PC19 also introduced a high-density sub-precinct into Precinct A of the Plimmerton Farm Zone chapter.

As noted, from a regional perspective, the recently adopted "Wellington Future Development Strategy 2024-2054" (an FDS as defined in the NPS-UD) identifies the Northern Growth Area as a "Priority Development Area", further establishing its regional significance.

Anything else?

Please write your answer here:

The statement above requires that the application must be supported by an explanation as to how the project will help achieve the purpose of the Bill, that is to "provide a fast-track decision-making process that facilitates the delivery of infrastructure and development projects with significant regional or national benefits".

In addition to the points made in earlier responses, ultimately, the Plimmerton Farm development will achieve, and is inherently consistent with the purpose of the Bill as it is a development project with significant regional benefit, for reasons that include the following:

(a) The site, together with the wider Porirua Northern Growth Area has been identified as a priority development in the recently adopted Wellington Development Strategy

(b) It will deliver extended and new regionally significant infrastructure

(c) It will increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment

(d) It will deliver significant economic benefits

(e) It will support climate change mitigation, including the reduction or removal of greenhouse gas emissions

(h) It will support adaptation, resilience, and recovery from natural hazards:

(i) It will address significant environmental issues

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

No ineligible activities are proposed as part of the development.

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

Yes insofar that development must ensure appropriate consideration of both climate change and natural hazards is given.

Refer earlier climate change discussion.

In relation to potential flood hazard risk, the Flood Modelling Report prepared for Stage One identifies areas of inundation identified by WWL's stormwater modelling, particularly around the SH1 roundabout and James Street. The report outlines that existing inundation levels are unlikely to improve without intervention. The Proposal includes on-site flood storage to accommodate volumes, ensuring hydraulic neutrality and reducing peak flow by 44-69% in various events.

The Flood Modelling Report demonstrates that the proposed flood storage area can mitigate increases in flows, accommodating expected volumes and climate change allowances on-site without worsening flooding in adjacent areas. There is a significant reduction in flood levels in SH59 and James Street during the 100-year ARI with climate change, positively impacting trafficability and benefiting nearby residents and properties. The report concludes that the design meets PFZ provisions for stormwater and natural hazard management, with potential flood hazard effects assessed as less than minor and, in some cases, positive. Therefore, it is considered that potential significant risks from flood hazard will be appropriately managed.

In relation to geotechnical hazards, the Geotechnical Assessment prepared for Stage One addresses potential hazards from land instability and geotechnical issues, including liquefaction.

The assessment identifies the proposed wetland restoration areas as being on a floodplain with shallow, soft, and liquefiable soils, presenting risks of consolidation settlement, liquefaction, and embankment stability. Risks are proposed to be mitigated through undercutting soft soils, earthworks preloading, and engineered fill to prevent liquefaction. The assessment also outlines that lateral spreading concerns affecting embankments can be addressed through building setbacks from slopes and earthworks design.

The assessment further outlines that risks of slope instability can be addressed through retaining walls, reinforcement, undercutting soft soils, appropriate drainage, and building setbacks. In terms of relic slips and recent instabilities the assessment proposes remediation processes like excavation, engineered fill, slope stabilisation, catch fencing, debris bunds, and retaining walls are proposed.

In terms of the proposed built development, shallow foundations are recommended for most building designs, with recommendations for managing cut slopes and reusing materials on-site. The earthworks design incorporates these recommendations, and it is expected that future consent conditions will require adherence to geotechnical reports. Other measures include geotechnical inspection during construction and monitoring and preparing completion reports at the end of earthworks stages that may outline specific recommendations for the residential lots. These measures aim to ensure appropriate management of land instability effects, and geotechnical hazard risk.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

An abatement notice was issued against to KMMGH by GWRC for earthworks associated with the Mo Street subdivision. The conditions of the abatement notice were fully complied with and closed out.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Aaron Portland

Important notes