

Application for a project to be referred to an expert consenting panel

(Pursuant to Section 20 of the COVID-19 Recovery (Fast-track Consenting) Act 2020)

For office use only:

Project name: Metlifecare Retirement Village - Karori
Application number: PJ-0000852
Date received: 23/12/2022

This form must be used by applicants making a request to the responsible Minister(s) for a project to be referred to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

All legislative references relate to the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the Act), unless stated otherwise.

The information requirements for making an application are described in Section 20(3) of the Act. Your application must be made in this approved form and contain all of the required information. If these requirements are not met, the Minister(s) may decline your application due to insufficient information.

Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail, sufficient to inform the Minister's decision on the application, as opposed to the level of detail provided to an expert consenting panel deciding applications for resource consents or notices of requirement for designations.

We recommend you discuss your application and the information requirements with the Ministry for the Environment (the Ministry) before the request is lodged. Please contact the Ministry via email: fasttrackconsenting@mfe.govt.nz

The Ministry has also prepared [Fast-track guidance](#) to help applicants prepare applications for projects to be referred.

Part I: Applicant

Applicant details

Person or entity making the request: Metlifecare Retirement Villages Limited

Contact person: Michelle van Kampen

Job title: Senior Development Manager

s 9(2)(a)

s 9(2)(a)

Postal address:

PO Box 37463

Parnell

Auckland 1151

Address for service (if different from above)

Organisation: Barker & Associates

Contact person: Evita Key / Magdalena Regnault

Job title: Snr Associate / Snr Planner

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Postal address:

PO Box 1986

Shortland Street

Auckland 1140

Part II: Project location

The application: does not relate to the coastal marine area

If the application relates to the coastal marine area wholly or in part, references to the Minister in this form should be read as the Minister for the Environment and Minister of Conservation.

Site address / location:

A cadastral map and/or aerial imagery to clearly show the project location will help.

29 Messines Road, Karori, Wellington, 6012, New Zealand

Legal description(s):

A current copy of the relevant Record(s) of Title will help.

29 Messines Road – Lots 122-124 DP 410 and Part Lot 121 DP 410

Please note that Metlifecare are currently in the process of amalgamating the titles therefore the new title will be Lot 1 DP 579886.

Please also refer to **Attachment 1** for a site plan and **Attachment 2** for copies of the records of title and interests

Registered legal land owner(s):

Metlifecare Retirement Villages Limited

As noted above the applicant is the registered legal owner of the land on which the project will occur.

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work that is required for the project:

There are no legal interests which would prevent MLC's ability to apply for a RC for the development or implement that consent:

- 12374221.9 - This interest relates to the retention and maintenance of the space for worship and spiritual care. The encumbrance specifically provides for the partial discharge of the encumbrance where Karori Village is substantially redeveloped such as is proposed. This interest will not affect MLC's ability to undertake the proposed development.
- 7586723.1 - This interest relates to the notification of the registration of the retirement village. This interest will not affect MLC's ability to undertake the proposed development.
- 377584.3 - This interest relates to an easement for the conveyance of wastewater drainage from 29 Messines Rd over 28 Ponsonby Road (Lot 106 DP 2707). This interest will not affect MLC's ability to undertake the proposed development.

Part III: Project details

Description

Project name: Metlifecare Retirement Village - Karori

Project summary:

Please provide a brief summary (no more than 2-3 lines) of the proposed project.

The proposal includes the redevelopment of 1.2381ha of Outer Residential zoned land to accommodate a new retirement village and care home consisting of approximately 80 residential units and 55 care suits, communal amenity spaces and vehicle parking in Karori, Wellington (refer Attachment 3). Associated works include earthworks, servicing infrastructure, and pedestrian and vehicle accesses.

Project details:

Please provide details of the proposed project, its purpose, objectives and the activities it involves, noting that Section 20(2)(b) of the Act specifies that the application needs only to provide a general level of detail.

The purpose of the proposal is to undertake a redevelopment of the retirement village which has reached the end of its economic life and requires redevelopment.

The objective of the project is to provide a new modern and high-quality retirement village and care home that fulfils the needs of elderly residents, visitors and staff.

A summary of the key elements of the proposal is set out below:

The retirement village and associated facilities will comprise—

(a) approximately 80 residential units, including—

- independent living units in multiple buildings, that are 3 to 4 storeys in height and includes amenity services;

(b) a single-level basement parking area;

(c) a care home in a building that is up to 3 storeys in height that accommodates—

- approximately 15 memory care (secure dementia) units;
- approximately 40 other dual care (rest home and hospital) units;

(d) common facilities for village residents including dining, lounge, outdoor recreation, and other social spaces; and

(e) at-grade and undercroft car parking areas.

Consent is also sought for the associated earthworks and infrastructure.

Where applicable, describe the staging of the project, including the nature and timing of the staging:

Enabling works including bulk earthworks, the construction of accesses and connections to infrastructure and some upgrades will likely be carried out across the entire project site. The subsequent construction of apartment units, care facility and subdivision may be completed across several stages. The indicative project timeline is included at

Attachment 4.

Should the project be accepted as a referred project and subsequently granted resource consent approval, it is anticipated that enabling works will commence in late 2024, with construction works to be carried out from early 2025.

Building consent preparation for the civil works and demolition will commence immediately following resource consent approval, to enable the enabling works to commence as soon as practicable following the grant of resource consent. The staging of construction has not yet been determined.

Consents / approvals required

Relevant local authorities: Greater Wellington Regional Council, Wellington City Council

Resource consent(s) / designation required:

Land-use consent

Relevant zoning, overlays and other features:

Please provide details of the zoning, overlays and other features identified in the relevant plan(s) that relate to the project location.

Legal description(s)	Relevant plan	Zone	Overlays	Other features
Lots 122-124 DP 410 and Part Lot 121 DP 410 Please note that Metlifecare are currently in the process of amalgamating the titles therefore the new title will be Lot 1 DP 579886	Wellington District Plan (WDP)	Outer Residential Area	N/A	N/A

Rule(s) consent is required under and activity status:

Please provide details of all rules consent is required under. Please note that Section 18(3)(a) of the Act details that the project **must not include** an activity that is described as a prohibited activity in the Resource Management Act 1991, regulations made under that Act (including a national environmental standard), or a plan or proposed plan.

Relevant plan / standard	Relevant rule / regulation	Reason for consent	Activity status	Location of proposed activity
Wellington District Plan (WDP)	Rule 5.3.7	Construction of three or more household units within the outer residential area	Restricted discretionary	Application site
Wellington District Plan (WDP)	Rule 5.3.4	Where the proposal does not meet the residential standards for maximum height	Restricted discretionary	Application site

		and building recession planes		
Wellington District Plan (WDP)	Rule 5.3.11	For more than one sign of an area greater than 0.5m2	Restricted discretionary	Application site
Wellington District Plan (WDP)	Rule 23.2.1A	Utility structures situated above ground not being Permitted Activities	Controlled	Application site
Wellington District Plan (WDP)	Rule 30.2.1	For earthworks exceeding 250m2	Restricted discretionary	Application site
Greater Wellington Proposed Natural Resources Plan	Rule R106	For earthworks exceeding 3000m2	Restricted discretionary	Application site

Resource consent applications already made, or notices of requirement already lodged, on the same or a similar project:

Please provide details of the applications and notices, and any decisions made on them. Schedule 6 clause 28(3) of the COVID-19 Recovery (Fast-track Consenting) Act 2020 details that a person who has lodged an application for a resource consent or a notice of requirement under the Resource Management Act 1991, in relation to a listed project or a referred project, must withdraw that application or notice of requirement before lodging a consent application or notice of requirement with an expert consenting panel under this Act for the same, or substantially the same, activity.

No applications for resource consent or notices of requirement relating to this project have been lodged.

Resource consent(s) / Designation required for the project by someone other than the applicant, including details on whether these have been obtained:

There are no other resource consents or designations required for the project by someone other than Metlifecare. All proposed works can be delivered by Metlifecare, subject to obtaining the necessary resource consents as a referred project under this Act.

Other legal authorisations (other than contractual) required to begin the project (eg, authorities under the Heritage New Zealand Pouhere Taonga Act 2014 or concessions under the Conservation Act 1987), including details on whether these have been obtained:

There are no other legal authorisations required to begin the project.

Construction readiness

If the resource consent(s) are granted, and/or notice of requirement is confirmed, detail when you anticipate construction activities will begin, and be completed:

Please provide a high-level timeline outlining key milestones, e.g. detailed design, procurement, funding, site works commencement and completion.

Metlifecare confirm this project is construction ready, subject to obtaining resource consents, building consents and engineering plan approvals (EPA). The consultant team to prepare all the necessary documentation for the resource consent application has been appointed and, should this project be successfully referred by the Minister, the consultant team will immediately commence preparation of the resource consent application.

The anticipated project timeline (refer **Attachment 4**) includes the following key milestones:

- Prepare resource consent application documentation: Late-2022 – Mid-2023
- FTCA resource consent processing and decision: Mid-2023 – Early-2024
- Prepare engineering and building consents (enabling and building works): Early-2024 – Late 2024
- Engineering and building consent processing and decisions: Mid-2024 – Late-2024

- Site enabling works including demolition, bulk earthworks and infrastructure: Commencing late-2024
- Construction: Commencing early 2025

With regard to procurement, Metlifecare has well established relationships with Designgroup Stapleton Elliott and other consultants who will likely be appointed to complete the detailed design of residential units for building consents for the new buildings. Of note, Designgroup Stapleton Elliott Architects and McIndoe Urban Ltd will be actively engaged throughout the resource consent process in the design of new buildings.

Metlifecare was established in 1984 and is a leading owner and operator of retirement villages in New Zealand. With regards to funding, Metlifecare has a long-term plan in place to manage cash-flow, including a \$1.25 billion Sustainability-Linked Loan, providing certainty to ongoing investment and project completion. Metlifecare has a proven track record of developing retirement villages within New Zealand and confirms this project is construction ready, subject to obtaining resource consents, building consents and engineering approvals.

Part IV: Consultation

Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

A pre-application meeting concerning the use of the fast-track referral process was held with the Ministry for the Environment on 20 December 2022. The suggestions and feedback made at this meeting by MfE staff have been incorporated into this referral application.

Local authorities

Detail all consultation undertaken with relevant local authorities:

A pre-application meeting was held with Wellington City Council on the 8th December 2022. Due to the confidential nature of the proposal, no record or meeting minutes were provided. Councils planning, urban design and transport advisors were present during the meeting. The proposal was generally supported and the following feedback was received:

- As the site is not subject to any qualifying matters, the Wellington Proposed District Plan (PDP) provisions that relate to the Medium Density Residential Standards (MDRS) have immediate legal effect and are able to be utilised for the project.
- The transport advisor requested that further consideration should be given to cycle storage and end of trip facilities for staff members. The applicant noted that this is standard practice for new village developments and intends to incorporate the feedback into the plans during the development of the resource consent plans.
- The urban designer suggested exploring a walkable landscape loop around the perimeter of the site to increase outdoor amenity for residents. The applicant will explore this suggestion however notes that while outdoor amenity forms a key part of any village proposal, there is a preference for internal amenity options from the elderly demographic particularly with the changeable weather within Wellington.
- The urban designer advised that the design of the development does not need to replicate the form of the surrounding neighbourhood and there is a preference for developments to look like what they are, i.e., a retirement village.
- The urban designer requested that sustainability is considered within the development. The applicant advised that sustainability is one of their core values and that the development will potentially be Homestar and Greenstar rated. Features such as, edible gardens will be considered and bike storage and e-vehicle charging will be provided.
- The planner advised that the topography drops towards the east and that they are interested in understanding potential effects to these adjacent properties. The planner did not raise any concerns in relation to bulk and dominance, privacy, or shading effects in regard to any other persons. Amenity effects on neighbouring properties will be carefully considered and addressed as part of the resource consent application.

The applicant agreed to continue discussions with the Council throughout the process to finalise the design for resource consent.

Other persons/parties

Detail all other persons or parties you consider are likely to be affected by the project:

No persons or parties are considered likely to be adversely affected by the project. The proposal is for a residential activity on land that is residentially zoned under the WDP.

The proposed retirement village is in keeping with the existing land use of the project site, and will largely comply with the operative and proposed WDP zoning standards apart from maximum height and building recession planes.

Due to the sites history and current use, the proposed project will not result in a change to the existing character of the surrounding area, although acknowledged that it will be of a greater intensity, it is considered to be in keeping with the anticipated outcomes of the underlying PDP zoning and intent of the National Policy Statement on Urban Development 2020 ('NPS-UD').

Detail all consultation undertaken with the above persons or parties:

N/A

Part V: Iwi authorities and Treaty settlements

For help with identifying relevant iwi authorities, you may wish to refer to [Te Kāhui Māngai – Directory of Iwi and Māori Organisations](#).

Iwi authorities and Treaty settlement entities

Detail all consultation undertaken with Iwi authorities whose area of interest includes the area in which the project will occur:

Iwi authority	Consultation undertaken
There are no sites of significance on or near the site and it is not located within, adjacent to or will affect the Port Nicholson or Ngāti Toa Statutory Acknowledgement Area.	N/A
Notwithstanding, relevant iwi authorities for Wellington City are: •Te Rūnanga o Toa Rangatira (Ngāti Toa Rangatira) • Port Nicholson Block Settlement Trust (Taranaki Whānui ki te Upoko o te Ika)	N/A

Detail all consultation undertaken with Treaty settlement entities whose area of interest includes the area in which the project will occur:

Treaty settlement entity	Consultation undertaken
No details	

Treaty settlements

Treaty settlements that apply to the geographical location of the project, and a summary of the relevant principles and provisions in those settlements, including any statutory acknowledgement areas:

Section 18(3)(b) of the Act details that the project **must not include** an activity that will occur on land returned under a Treaty settlement where that activity has not been agreed to in writing by the relevant land owner.

The project would not occur on land returned under a Treaty Settlement.

Part VI: Marine and Coastal Area (Takutai Moana) Act 2011

Customary marine title areas

Customary marine title areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(c) of the Act details that the project **must not include** an activity that will occur in a customary marine title area where that activity has not been agreed to in writing by the holder of the relevant customary marine title order.

The project would not occur in a customary marine title area under the Marine and Coastal Area (Takutai Moana) Act 2011.

Protected customary rights areas

Protected customary rights areas under the Marine and Coastal Area (Takutai Moana) Act 2011 that apply to the location of the project:

Section 18(3)(d) of the Act details that the project **must not include** an activity that will occur in a protected customary rights area and have a more than minor adverse effect on the exercise of the protected customary right, where that activity has not been agreed to in writing by the holder of the relevant protected customary rights recognition order.

The project would not occur in a protected customary rights area.

Part VII: Adverse effects

Description of the anticipated and known adverse effects of the project on the environment, including greenhouse gas emissions:

In considering whether a project will help to achieve the purpose of the Act, the Minister may have regard to, under Section 19(e) of the Act, whether there is potential for the project to have significant adverse environmental effects. Please provide details on both the nature and scale of the anticipated and known adverse effects, noting that Section 20(2)(b) of the Act specifies that the application need only provide a general level of detail.

It is considered that the proposal will not have any long term, significant adverse effects on the environment. Actual and potential adverse effects are addressed in general below and should be reviewed in conjunction with the supporting technical assessments accompanying this application.

Residential Character and Amenity

The proposal has the potential to result in a change to the residential character and amenity values of the existing neighbourhood. An urban design assessment has been provided by McIndoe Urban Limited as **Attachment 5**. That assessment addresses the potential effects of the development on streetscape character and amenity values of the surrounding area. McIndoe Urban note the following:

- The visual effects of massing and vertical scale are mitigated by nestling buildings into the contours and by utilising setbacks and other open spaces around the perimeter of the site. **Attachment 3** to this application includes images from identified viewpoints in Karori.
- The development is not readily visible from the wider neighbourhood due to the topography and existing and proposed landscape elements. The proposal will be visible from Ponsonby Road however façade and roofscape articulation will mitigate any visual effects on viewers in this location.
- Apartment Building B, which is the tallest, is centrally placed. It is also located to the rear and south of the neighbouring Hauora Trust property which provides specialist residential and respite support to persons living with physical or neurological disabilities. Positioning Building B in this manner avoids off-site visual and shading effects to this neighbouring site and its residents/staff.

- The top storey of Apartment Building B extends through the PDP height limit along with the roof forms of most other buildings. Given generous setbacks and compliance with PDP recession planes, these roof forms contribute positively to visual quality and scale articulation.
- The potential for off-site privacy effects and visual dominance is avoided by a combination of building setbacks and retention of existing landscaping (where possible) and new landscaping. The indicative landscape masterplan is included in the concept plans in **Attachment 3**.
- Carparking and vehicle access has primarily been located internally within the proposed apartment and care blocks to reduce any adverse effects on streetscape amenity.
- Comprehensive planning has allowed for a design with high-quality open space and amenities. The development provides for a high degree of on-site amenity. Basement carparking enables the production of high-quality, ground-level open spaces.

McIndoe Urban summaries their assessment concluding that the proposal is an appropriate architectural and urban design response to development in this context.

In addition to McIndoe Urban's assessment, the follow comments are made in regards to residential amenity and streetscape effects:

- Regular physical breaks have been proposed within the built form, breaking the development down into a number of smaller buildings which is more consistent with typical suburban residential housing developments in the wider area.
- The proposed buildings adjacent to the street typically have their primary frontage orientated toward the street providing activation and passive surveillance outcomes resulting in a safer street environment and more positive built edge to Messines Road than existing patterns of development. Similarly, the proposed buildings adjacent to the public pedestrian connection to Ponsonby Road will create greater activation and surveillance to this edge.
- Shading studies (refer to **Attachment 3**) demonstrate that the proposal will result in less than or similar levels of shading to a permitted building envelope under the PDP. The over-height Apartment Building B casts no additional shading beyond the boundary.
- Intensive landscaping and setback distances are considered to mitigate potential privacy effects to neighbouring properties.
- The proposed residential units are anticipated to be generally compliant with the relevant standards associated with the underlying Outer Residential zone and MDRS apart from those described above relating to height.

Transport

The potential transportation effects include trip generation, effects on the existing road network, the design of new access and public transport connectivity have been assessed in the preliminary transport appraisal prepared by Stantec (refer to **Attachment 6**).

Overall, it is considered that the scale and effects of additional traffic activity generated by redevelopment of the Metlifecare village will be small, and it is not expected that any transport effects warranting mitigation would be triggered by the traffic additions.

Earthworks

Bulk earthworks will be required across the site to enable the construction of vehicular access, new and upgraded infrastructure and new buildings. The nature and scale of these works are considered to be common for brownfield developments of this nature.

While the scale of the works will be large in the context of the established residential areas, it is noted that they will be temporary in duration and not out of character within a brownfield site. Overall, it is considered that the actual and potential adverse environmental effects arising from earthworks can be appropriately managed through the implementation of sediment erosion control measures and construction management plans.

Construction Related Effects

The construction methodology will be developed to manage adverse construction effects and it is envisaged that the conditions of consent can be utilised for the preparation of a construction management plan. It is considered that the construction noise and vibration levels will not be unreasonable for the scale and type of works proposed. The construction methodology developed for the site, and any mitigation required, will ensure that construction noise and

vibration effects of adjacent land uses are minimised and mitigated as far as practicable to ensure that neighbours' amenity is reasonably protected.

Contaminated Land

The site has a history of residential uses dating back to 1898 and is not identified on the Wellington Regional Council's Selected Land Use Register or the Ministry for the Environment's hazardous activities and industries (HAIL) list. There is asbestos in some of the buildings which will need to be appropriately managed during demolition.

Infrastructure and Servicing

The civil engineering memo prepared by Envelope Engineering (refer **Attachment 7**) details the project's servicing strategy and confirming that the project can be sufficiently serviced in respect to stormwater, water supply, wastewater and utilities.

With regards to stormwater, connections are proposed to the existing network. While impermeable area may decrease from the existing arrangement, it has been determined attenuation may be required on site. Stormwater from carparking and vehicle traffic areas will be treated prior to discharge via rain gardens or other similar devices. Flooding is not predicted and building floor levels can be set in accordance with standard building code requirements. With regards to water supply and wastewater, upgrades to the existing network are proposed to service the project. Investigations to date confirm that only minor local upgrades will be required which includes a wastewater pumping station to mitigate the increased wastewater demand.

Envelope Engineering has been in discussion with Wellington Water regarding the servicing requirements of the project.

Overall, there is a high degree of confidence that the project will be adequately serviced without creating significant adverse effects on the environment.

Socio-Economic Effects

It is not anticipated that the proposal will give rise to any socio-economic adverse effects, rather it will have a range of positive effects for Karori and the surrounding area. The Project will be a positive contributor in terms of public benefit both during the building phase and once operational. The development will provide job generation and economic stimulus for the area, as well as an increase in retirement village units which will assist in freeing up established homes for other home buyers, as further detailed in Part IX of this application and the economic assessment (refer **Attachment 8**).

Greenhouse Gas Emissions

The proposed development will see the development of a brownfield site within an established local centre, within relatively close proximity to Wellington CBD. This will take advantage of existing connections to local infrastructure (roads and servicing), as well as existing public transport networks. Emissions will potentially be reduced through reducing the distance travelled by vehicles due to the provision of convenient public and active transport networks. Further, the residential apartments within the development will be designed to target a Homestar rating. Homestar is an independent national rating tool that certifies the health, efficiency and sustainability of New Zealand homes. Achieving a Homestar rating will ensure that the dwellings are warmer, healthier and more environmentally sustainable than a dwelling built only to the New Zealand Building Code. In order to achieve this rating, a variety of sustainable building elements will be considered throughout the design process.

Conclusion

The actual and potential adverse effects of the proposal are of a nature and scale that are able to be appropriately managed through design and on-going management. This will ensure that any adverse effects are appropriately avoided or mitigated, as well as remedied (where required). Overall, it is anticipated the proposal will not result in any significant adverse environmental effects.

Part VIII: National policy statements and national environmental standards

General assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard:

National Policy Statement on Urban Development 2020 (NPS-UD)

The NPS-UD enables the development of land and infrastructure for urban land uses while recognising the national significance of well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing (Objective 1 and Policy 1).

It is considered that the project is consistent with the relevant objectives and policies of the NPS-UD and will contribute to a well-functioning urban environment for the following reasons:

- The project will support competitive land and development markets and contribute to improving retirement and care options centrally in Wellington;
- The project will provide for a form of housing for the elderly within an established residential neighbourhood in Karori, Wellington by delivering approximately 80 residential units in apartment typologies and 55 care suites. The project is located on land that is predominately surrounded by existing residential development dominated by detached typologies, although the northern neighbour accommodates a large scale residential and respite support building; and,
- The proposed housing development will integrate the provision of infrastructure servicing.

National Policy Statement for Freshwater 2020 (Freshwater NPS)

The Freshwater NPS seeks to manage natural and physical resources to prioritise firstly, the health and well-being of water bodies and freshwater ecosystems, secondly, the health and needs of people, and thirdly the ability to provide for the social, economic, and cultural well-being of people and communities. The subject site does not include any water bodies, wetlands or rivers. The Freshwater NPS is therefore not considered relevant to this proposal.

National Environmental Standards for Freshwater 2020 (Freshwater NES)

The National Environmental Standards for Freshwater 2020 ('Freshwater NES') sets out requirements for carrying out certain activities that pose risks to freshwater and freshwater ecosystems. Of particular relevance to the project are provisions which prohibit works in and around natural wetlands, and works affecting rivers and streams. Resource consent will not be required under the Freshwater NES as there are no natural wetlands, rivers, or streams within the project site.

National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NESC)

The purpose of the NESC is to ensure that land affected by contaminants in soil is appropriately identified and assessed before it is developed (and remediated if necessary). Resource consent under the NESC will not be required as the site has not been identified as being contaminated.

Part IX: Purpose of the Act

Your application must be supported by an explanation how the project will help achieve the purpose of the Act, that is to "urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources".

In considering whether the project will help to achieve the purpose of the Act, the Minister may have regard to the specific matters referred to below, and any other matter that the Minister considers relevant.

Project's economic benefits and costs for people or industries affected by COVID-19:

The proposed project will create economic benefits for people and industries affected by COVID-19 by providing direct and indirect employment in the Wellington region, particularly in the construction industry (short-term) and aged health care (long-term) although it is acknowledged that the site is already an existing retirement village that provides aged health care employment. An Economic Impact Assessment (EIA) has been prepared by Market Economics (refer **Attachment 8**), where the direct economic impact of the project is estimated at 304 full time equivalent Wellington professional and construction related jobs between 2022 and 2028. Once indirect and induced effects are considered (i.e. additional activity stimulated by the development across the whole economy) then the fast track scenario contributes to sustaining a total of 1,170 FTE jobs.

The EIA also finds that the development, if fast tracked, will stimulate \$121 million of direct and indirect value across the duration of the development construction. This compares to \$108.7 million under the RMA consenting pathway.

In addition to professional and construction related jobs, the completed retirement village is projected to require 65.2 FTE staff which is an increase on the existing staffing level of 62 FTEs.

Project's effects on the social and cultural wellbeing of current and future generations:

The project will result in positive effects on the social and cultural wellbeing of current and future generations, by way of job creation and increased supply of retirement home and care living options. The project will stimulate significant economic activity and accelerate the delivery of housing to a market that is experiencing shortages. Supply of additional retirement village housing in Karori will contribute to housing variety and choice for the elderly demographic as well as enabling existing local residents to stay within an area that they are familiar with or locate close to family. The project will also provide a number of infrastructure upgrades, including social infrastructure, that will have longstanding benefits to current and future generations.

The project is considered to create a high quality and well-connected urban environment will help create a vibrant, diverse community which will also benefit future generations.

Whether the project would be likely to progress faster by using the processes provided by the Act than would otherwise be the case:

The project is estimated to progress significantly faster by using the processes providing by the FTCA, with an expected resource consenting period of around six months. This would allow enabling works to commence in late-2024/early 2025 instead of early 2027 (refer **Attachment 4**).

The EIA (refer **Attachment 8**) estimates the project progressing up to two years faster by using the process provided by the FTCA. This factors in both processing timeframes for the resource consent and additional complexities and risks that may delay the consent from being implemented such as the potential for a publicly notified application and the delays associated with any merits-based appeals to the Environment Court.

If the RMA process was utilised, it is considered likely that the resource consent application would be publicly notified by Wellington City Council. A similar development in Karori, albeit on a larger scale to this proposal, is the recently approved retirement village at 26 Donald Street and 37 Campbell Street, Karori. Ryman's purchased this site back in 2017 and following the lodgement of the resource consent in September 2020, and public notification in April 2022, it was only recently approved in November 2022.

On other developments around New Zealand, Metlifecare has experienced significant resource consenting delays due to Council's having to deal with large resource consent volumes and staff capacity restrictions. It is expected that if the RMA process was used then it would likely take some 18 months to have the consents processed as well as having to lodge applications with both the Wellington City Council and Greater Wellington Regional Council.

Whether the project may result in a 'public benefit':

Examples of a public benefit as included in Section 19(d) of the Act are included below as prompts only.

Employment/job creation:

The proposed project will create economic benefits for people and industries by providing direct and indirect employment in the Wellington region, particularly in the construction industry (short-term) and aged health care (long-term).

The EIA has estimated that the project will create approximately 1,137 Full Time Equivalent (FTEs) jobs during construction.

Housing supply:

Should the project be accepted as a referred project under the Act, it will accelerate the delivery of approximately 80 new residential units and 55 care units in the Wellington region on a brownfield site. While the proposal will replace an existing retirement village, the existing village has reached the end of its economic life. Overall, the proposal will increase the overall number of village units on site. New Zealand is currently experiencing a shortage of retirement living options, including care options. The EIA finds that the proposed number of new residential units has the ability to improve responsiveness to an aging population within the surrounding area and increase overall competitiveness within the retirement village market.

Furthermore, the project will assist in releasing pressure on social and health services and will also have a crucial role in the general housing market because the supply of retirement village housing releases existing housing stock back into the market.

Contributing to well-functioning urban environments:

The proposal is considered to be in keeping with the NPS-UD objective of achieving well-functioning urban environments for the following reasons:

- The development provides specialised housing for the elderly demographic and includes a range of typologies and sizes which contrasts with the predominant detached housing forms on medium sections which currently exist in the area.
- The proposal is located adjacent to two Messines Road bus stops which provide connections through Karori and the city centre. Both of these centres will provide significant local employment opportunities.
- The proposal limits car parking to one space per independent living unit (ILU), 0.3 per care suite and 0.2 per ILU for visitors helping to restrain total car ownership and reduce greenhouse gas emissions arising from the development.
- Cycle storage/parking will be incorporated in the design which will promote active modes of travel.

Providing infrastructure to improve economic, employment, and environmental outcomes, and increase productivity:

The project will include investment in three waters infrastructure including services for water supply, stormwater, and wastewater.

Improving environmental outcomes for coastal or freshwater quality, air quality, or indigenous biodiversity:

The project will improve environmental outcomes for freshwater quality as it will include the construction of new reticulated infrastructure for the treatment and disposal of stormwater.

Currently, there are no indigenous biodiversity values associated with the site (as identified under the WDP).

Notwithstanding, the project presents the opportunity to retain the existing established landscaping (where possible) as well as provide new landscaping which will likely lead to an increase in biodiversity values. An indicative landscaping masterplan is included in **Attachment 3**.

Minimising waste:

Metlifecare recognise the importance of minimising waste and avoiding unnecessary use of resource. In the past year Metlifecare has worked hard to identify how to reduce the waste footprint of each existing village. Waste audits completed across a number of villages have enabled Metlifecare to understand the waste composition of different village profiles, and develop a range of initiatives designed to significantly reduce biodegradable waste to landfill. These initiatives will be able to be incorporated into the Metlifecare Karori development.

The initiatives, which range from repurposing and recycling of inorganic items through to composting of green matter, are being supported at many villages by village management, employees and residents alike, and Metlifecare is already seeing the benefits. Metlifecare continues to drive waste reduction on its building sites through commercial recycling and waste diversion partnerships, as well as using prefabricated building systems, and new construction technologies to reduce the waste produced on site where possible.

Contributing to New Zealand's efforts to mitigate climate change and transition more quickly to a low-emissions economy (in terms of reducing New Zealand's net emissions of greenhouse gases):

Metlifecare has committed to establishing a science-based decarbonisation target. In line with the Paris Agreement goal of limiting global warming to 1.5°C, Metlifecare is implementing annual reductions in greenhouse gas emissions to achieve that target. This is a first for a New Zealand-based retirement village and aged care operator. Initiatives used in other villages, which will also be explored for Metlifecare Karori include: conversion of laundries from gas to electricity, water and space heating systems, building managements systems, and electric bike and car charging.

The project will also contribute to efforts to mitigate climate change and reduce net emissions of greenhouse gases by improving public and active modes of transport.

As detailed in the transportation memo as **Attachment 6**, the project includes the retention of footpaths along the site frontage to Messines Road, and internal roading upgrades that will facilitate a safer pedestrian environment. An increased residential population will also improve the viability of more frequent public transport connections which could also benefit the existing neighbourhood. The project also includes access ways that improve connectivity and walkability within the project site

The project site is within walking distance to existing bus stops, which provides a direct connection to the Wellington Central (20 minutes) in turn provides onwards connection to wider Wellington. With the increase in population and improved pedestrian access surrounding the project site, the proposal is anticipated to be a catalyst for improving mode choice and connectivity.

Furthermore, Metlifecare is committed to delivering high-quality, bespoke design retirement villages that reflect Metlifecare's commitment to sustainability. The apartments will potentially be built to a Homestar rating and the care home to Greenstar rating.

Promoting the protection of historic heritage:

There are no known archaeological sites or features located within the project site. It was determined that the accidental discovery protocols outlined in the WDP and the Heritage New Zealand Pouhere Taonga Act 2014 can be relied upon should subsurface remains be uncovered during earthworks. As such, it is considered that historic heritage will be appropriately protected within the project site.

Strengthening environmental, economic, and social resilience, in terms of managing the risks from natural hazards and the effects of climate change:

The subject site has not been identified as being subject to any natural hazards.

With regard to climate change, Envelope Engineering has confirmed that the site is not subject to flooding. The site is located inland and the risk associated with coastal hazards are low.

Metlifecare confirms that geotechnical investigations will be carried out as part of the design of the village including the location of driveways and village units.

Overall, it is considered that natural hazards associated with land stability can be appropriately managed and the project site can be developed to accommodate urban residential land uses in a manner that is resilient to natural hazards and the effects of climate change.

Other public benefit:

Various public benefits have been highlighted within this application. In the short term, the project will provide employment within the construction industry, which has been identified as one of the sectors that in assisting with the social and economic recovery of Covid-19. In the longer term, the project will provide residential and business growth and will contribute to providing housing supply and choice for the elderly demographic within the Wellington region and the suburb of Karori in particular.

Whether there is potential for the project to have significant adverse environmental effects:

It is considered that there would not be any significant adverse environmental effects generated by the project. The adverse effects assessment addressed in Part VII of this application and supporting technical memos confirm that potential adverse effects of the project can all be avoided, managed or remedied without giving rise to any significant adverse environmental effects.

Part X: Climate change and natural hazards

Description of whether and how the project would be affected by climate change and natural hazards:

The project will promote the sustainable management of natural and physical resources as it is an efficient use of residentially zoned land. The proposal provides a high degree of confidence that physical infrastructure can be appropriately provided for, environmental effects can be suitably managed, and that the development will be resilient to climate change and natural hazard events, including risks associated with land stability and flooding and climate change.

Part XI: Track record

A summary of all compliance and/or enforcement actions taken against the applicant by a local authority under the Resource Management Act 1991, and the outcome of those actions:

Local authority	Compliance/Enforcement Action and Outcome
Wellington City Council	No known compliance and/or enforcement actions have been taken against Metlifecare by a local authority under the RMA.

Part XII: Declaration

I acknowledge that a summary of this application will be made publicly available on the Ministry for the Environment website and that the full application will be released if requested.

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.

Evita Key

22/12/2022

Signature of person or entity making the request

Date

Important notes:

- Please note that this application form, including your name and contact details and all supporting documents, submitted to the Minister for the Environment and/or Minister of Conservation and the Ministry for the Environment, will be publicly released. Please clearly highlight any content on this application form and in supporting documents that is commercially or otherwise sensitive in nature, and to which you specifically object to the release.
- Please ensure all sections, where relevant, of the application form are completed as failure to provide the required details may result in your application being declined.
- Further information may be requested at any time before a decision is made on the application.
- Please note that if the Minister for the Environment and/or Minister of Conservation accepts your application for referral to an expert consenting panel, you will then need to lodge a consent application and/or notice of requirement for a designation (or to alter a designation) in the approved form with the Environmental Protection Authority. The application will need to contain the information set out in Schedule 6, clauses 9-13 of the Act.
- Information presented to the Minister for the Environment and/or Minister of Conservation and shared with other Ministers, local authorities and the Environmental Protection Authority under the Act (including officials at government departments and agencies) is subject to disclosure under the Official Information Act 1982 (OIA) or the Local Government Official Information and Meetings Act 1987 (LGOIMA). Certain information may be withheld in accordance with the grounds for withholding information under the OIA and LGOIMA although the grounds for withholding must always be

balanced against considerations of public interest that may justify release. Although the Ministry for the Environment does not give any guarantees as to whether information can be withheld under the OIA, it may be helpful to discuss OIA issues with the Ministry for the Environment in advance if information provided with an application is commercially sensitive or release would, for instance, disclose a trade secret or other confidential information. Further information on the OIA and LGOIMA is available at www.ombudsman.parliament.nz.

Checklist

Where relevant to your application, please provide a copy of the following information.

No	Correspondence from the registered legal land owner(s)
No	Correspondence from persons or parties you consider are likely to be affected by the project
No	Written agreement from the relevant landowner where the project includes an activity that will occur on land returned under a Treaty settlement.
No	Written agreement from the holder of the relevant customary marine title order where the project includes an activity that will occur in a customary marine title area.
No	Written agreement from the holder of the relevant protected customary marine rights recognition order where the project includes an activity that will occur in a protected customary rights area.