

# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

<b>Local authority providing comment</b>	Greater Wellington Regional Council (GWRC)
<b>Contact person (if follow-up is required)</b>	Shaun Andrewartha – s 9(2)(a)
	Genevieve Walker – s 9(2)(a)
	Click or tap here to enter text.

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Metlifecare Retirement Village - Karori
<b>General comment – potential benefits</b>	The redevelopment and associated addition of housing stock for the elderly will have positive benefits for Karori and the region. Redevelopment of the site also allows for the consideration of water sensitive urban design measures.
<b>General comment – significant issues</b>	<p>As GWRC will be responsible for the compliance, monitoring, and enforcement of the consent (if granted), we request that the conditions of consent are consistent with similar developments consented by GWRC around the Region. We strongly encourage the applicant to consult with GWRC prior to lodgement to ensure a fit for purpose draft set of conditions is submitted with the application (if accepted).</p> <p>In regard to the policy framework and in addition to those matters outlined in S104 of the RMA, the proposal should demonstrate consistency with the Wellington Regional Growth Framework and the most recent notified changes to the Regional Policy Statement, particularly as it relates to density.</p>
<b>Is Fast-track appropriate?</b>	GWRC does not hold any concerns with the suitability of the proposal for the Fast-track consenting process.
<b>Environmental compliance history</b>	The applicant, Metlifecare Retirement Villages Limited does not have any recorded compliance history with GWRC.
<b>Reports and assessments normally required</b>	<ul style="list-style-type: none"> <li>- <b>Erosion Sediment Control Plan (ESCP)</b> At a minimum a <i>draft</i> ESCP should be submitted with the application and should be specific to the application site. This document should be prepared in accordance with the Erosion and Sediment Control Guidelines for the Wellington Region (2021).</li> <li>- <b>Operational Stormwater Report</b> Water Sensitive Urban Design measures will be required to minimise contaminants discharge from the site. Policies P83 and P84 of the Proposed Natural Resource Plan provide guidance for preparing this report.</li> </ul>
<b>Iwi and iwi authorities</b>	Ngāti Toa Rangatira; and

	Taranaki Whānui ki Te Upoko o Te Ika (Port Nicholson Block Settlement Trust).
<b>Relationship agreements under the RMA</b>	N/A
<b>Insert responses to other specific requests in the Minister's letter (if applicable)</b>	<p><b>Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?</b></p> <p>Greater Wellington considers it appropriate for the project to process through the FTCA.</p> <p>The matters that need to be addressed through a regional consenting process are typical of other medium-scale urban retirement developments in the region.</p> <p>We do seek that the conditions imposed on the consent (if granted) are consistent with conditions imposed on other similar developments, and sufficient to manage the adverse environmental effects from the development.</p> <p><b>What reports and assessments would normally be required by the council for a project of this nature in this area?</b></p> <p>See above.</p> <p><b>Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your region?</b></p> <p>See above.</p>
<b>Other considerations</b>	N/A

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.



















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<b>Organisation providing comment</b>	Wellington Water Limited (WWL)
<b>Contact person (if follow-up is required)</b>	Mohammed Hassan
	Team Leader – Growth Planning
	Network Strategy and Planning

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Metlifecare Retirement Village – Karori Project
<b>General comment</b>	<p>Wellington Water Limited makes this submission in its capacity as the existing network management and maintenance service provider to the Wellington City Council.</p> <p>Wellington Water has outstanding concerns regarding the serviceability of the Metlifecare Retirement Village - Karori Project, and the potential impact on the water supply network.</p> <p>As noted in the applicant’s Engineering Memo, this site is currently connected to two different water supply zones (these being the Croydon and Karori East DMAs). However, there are significant issues for the proposed development meeting the minimum level of service from either zone.</p> <p>The applicant proposes maintaining connections to the two separate zones, with water supply being from the Croydon DMA and the fire-fighting supply from the Karori East DMA, but the applicant has not provided any field testing or supporting calculations to confirm the viability of this solution.</p> <p>Based on the existing WWL modelling, the existing network is unable to meet the minimum pressure supply requirements if connection is from the Karori East DMA, and the Croydon Reservoir has a significant storage shortfall for the current level of development within the Croydon DMA. Due to the significant storage shortfall at the Croydon Reservoir, no additional connections should be allowed within this DMA without onsite storage being provided. This is particularly important for this development because of the vulnerability of the residents.</p> <p>To enable the development to meet the minimum serviceability requirements, it would either need to include onsite storage and/or booster pump, or external network upgrades would be required.</p> <p>Due to these outstanding issues, Wellington Water consider that there are still fundamental servicing options/decisions that need to be resolved prior to advancing consenting.</p> <p>In addition to the above matters, Wellington Water has wider interest in the proceedings to ensure that effects to the operational three water networks are appropriately avoided or mitigated, and that consent conditions for design, construction, and connection of new 3-W assets are included where relevant.</p>
<b>Other considerations</b>	<ul style="list-style-type: none"> <li>Wastewater mitigation is required for the development, and this has been proposed by the applicant. The detailed design of this system would need to be assessed and</li> </ul>

	<p>approved by Wellington Water, and therefore conditions requiring this approval process should be imposed.</p> <ul style="list-style-type: none"> <li>Hydraulic Neutrality and Stormwater Quality Treatment is required for the development, and this has been proposed by the applicant. The detailed design of these systems would need to be assessed and approved by Wellington Water, and therefore conditions requiring this approval process should be imposed.</li> </ul>
<b>[Insert specific requests for comment]</b>	No specific requests have been received from the Minister

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<b>Local authority providing comment</b>	Wellington City Council
<b>Contact person (if follow-up is required)</b>	Kathryn Barnes
	Senior Consent Planner
	s 9(2)(a)

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	Metlifecare Retirement Village - Karori Project
<b>General comment – potential benefits</b>	<p>The proposal includes the redevelopment of a 1.2381ha site 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. Associated works include earthworks, servicing infrastructure, and pedestrian and vehicle accesses.</p> <p>The site falls within the Outer Residential Area in the Wellington Operative District Plan (ODP) and is zoned Medium Density Residential under the Wellington Proposed District Plan (PDP).</p> <p>Potential benefits generated by the proposal are likely to include:</p> <ul style="list-style-type: none"> <li>• The proposal will provide an increased number of residential units for the elderly demographic within the Karori area, as well as potentially releasing existing housing to a market that is experiencing shortages.</li> <li>• Economic and employment benefits particularly in the construction industry, with an estimated full time equivalent of 304 professional and construction jobs being provided between 2022 and 2028. (The applicant has provided an Economic Impact Assessment (EIA) prepared by Market Economics).</li> <li>• The project will include investment in three waters infrastructure including services for water supply, stormwater, and wastewater, including the construction of new reticulated infrastructure for the treatment and disposal of stormwater.</li> </ul>

<p><b>General comment – significant issues</b></p>	<p>Whilst there is insufficient detail provided at this time to determine the significance of any effects generated by the proposal, having regard to the relevant District Plan rules, and the lens of the relevant objectives and policies, the actual and potential effects of this proposal are considered to fall into the following categories:</p> <ul style="list-style-type: none"> <li>• Residential Amenity Effects (including shading, bulk and dominance, and privacy)</li> <li>• Urban Design (including streetscape and character)</li> <li>• Landscape Effects</li> <li>• Construction Effects (earthworks, noise, traffic management)</li> <li>• Earthworks and Geotechnical Effects</li> <li>• Traffic Effects</li> <li>• Noise Effects</li> <li>• Servicing / Three Waters Effects</li> <li>• Effects on Water Quality</li> <li>• Signage Effects</li> </ul>
<p><b>It is Fast-track appropriate?</b></p>	<p>Fast-track is not inappropriate, provided that the above issues/effects that would be addressed through the RMA process are otherwise appropriately addressed through the fast-track process.</p>
<p><b>Environmental compliance history</b></p>	<p>The Council is not aware of any environmental regulatory compliance issues associated with Metlifecare Retirement Villages Limited in Wellington City.</p>
<p><b>Reports and assessments normally required</b></p>	<p>The reports and assessments normally required by the Wellington City Council to accompany a resource consent for a development of this scale and nature include the following:</p> <ul style="list-style-type: none"> <li>• An assessment of what the proposal does and does not comply with; ideally a table showing the permitted District Plan standards and rules and whether the proposal complies with these requirements.</li> <li>• An Assessment of Environmental Effects (AEE) including, but not limited to, an assessment of the effects of the proposal, with particular regard any matters to which the Council has restricted its discretion.</li> <li>• An urban design assessment including an assessment against the requirements set out in the Residential Design Guide.</li> <li>• A shading analysis comparing the shading generated by the proposed development compared to the shading generated by the existing environment or a credible permitted baseline development.</li> <li>• A traffic assessment prepared by a suitably qualified Transport Engineer.</li> <li>• A landscape/visual effects report including information to be able to assess bulk and dominance on adjacent properties</li> <li>• An Earthworks Plan showing the extent of the earthworks, including the cut area(s) and cut height(s), the fill area(s) and depth(s) and the retaining walls or batters.</li> <li>• An assessment of the project’s servicing strategy in respect to stormwater, water supply, wastewater and utilities</li> <li>• An assessment against the relevant objectives and policies of the Operative and Proposed District Plans.</li> </ul>

<p><b>Iwi and iwi authorities</b></p>	<p>The Council’s mandated iwi partners are:</p> <ul style="list-style-type: none"> <li>• Te Rūnanga o To Rangatira, 2/4 Nohorua Street, Takapuwahia, Porirua 5022</li> <li>• Port Nicholson Block Trust, PO Box 12164, Thorndon, Wellington 6011</li> </ul> <p>The site is not identified as a site of significance to iwi and it is not a Statutory Acknowledgement Area.</p>
<p><b>Relationship agreements under the RMA</b></p>	<p>We have no specific relationship agreements under the RMA.</p>
<p><b>Insert responses to other specific requests in the Minister’s letter (if applicable)</b></p>	<p><b>1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?</b></p> <p>Fast-track is not inappropriate, provided that that any actual or potential effects that would be generated by the proposal , (as identified below) that would normally be addressed through the RMA process are otherwise appropriately addressed through the fast-track process.</p> <ul style="list-style-type: none"> <li>• Residential Amenity Effects (including shading, bulk and dominance, and privacy)</li> <li>• Urban Design (including streetscape and character)</li> <li>• Landscape Effects</li> <li>• Construction Effects (earthworks, noise, traffic management)</li> <li>• Earthworks and Geotechnical Effects</li> <li>• Traffic Effects</li> <li>• Noise Effects</li> <li>• Servicing / Three Waters Effects</li> <li>• Effects on Water Quality</li> <li>• Signage Effects</li> </ul> <p><b>2. What reports and assessments would normally be required by the Council for a project of this nature in this area?</b></p> <ul style="list-style-type: none"> <li>• An assessment of what the proposal does and does not comply with; ideally a table showing the permitted District Plan standards and rules and whether the proposal complies with these requirements. The application documents indicate that the proposed development will exceed the maximum height and building recession plane standards for the Medium Density Zone under the Proposed District Plan for Wellington City. There may be other non-compliances which have not yet been identified.</li> <li>• An Assessment of Environmental Effects (AEE) including, but not limited to, an assessment of the effects of the proposal, with</li> </ul>

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particular regard to any matters to which the Council has restricted its discretion.

- An urban design assessment including an assessment against the requirements set out in the Residential Design Guide.

The Concept Plans and Urban Design assessment accompanying the application to the Minister have been reviewed by the Council's Urban Design Advisor. The Urban Design Advisor notes that this is a substantial proposal that exhibits non-compliance with the plan in areas that are considered to have urban design implications. While the proposal proposes at conceptual level a development that is likely to be able to be given urban design support, the application is not considered to contain enough detail or information to enable a full urban design assessment against the relevant guidelines and policies. It is considered that an assessment against the guidelines within the relevant Residential Design Guide, as well comment on the urban design-related policies (including ODP policies MRZ-P2, P3 and P7) would improve the quality of the applicant's urban design assessment and demonstrate a better coverage of the urban design outcomes that might be anticipated for a development of this scale.

Therefore whilst the Council's Urban Design Team finds the proposal agreeable in principle further information regarding the following matters would be required:

- Contextual analysis at a wider scale
  - Site specific analysis at a more detailed scale, including circulation, connections, relationship to local amenities and services, sunlight
  - The extent and treatment of any landform mitigation including cut and fill, and the design of any retaining walls or other supporting structures that will remain visible once the buildings are finished
  - More detailed design information about frontages, facades, entrances and ground floor interface
  - More detailed information about the proposed design for the exterior facades
  - The proposed internal floor layout
  - Site landscaping
  - Comment on measures employed to meet Crime Prevention through Environmental Design (CPTED) guidelines
  - Details of proposed waste storage and collection, bike/non-car parking, and the location of plant and services
  - Information at a more detailed level about the amount of sunlight access and/or impact on this to rear yards of houses on Ponsonby Terrace.
- A shading analysis comparing the shading generated by the proposed development compared to the shading generated by the existing environment or a credible permitted baseline development.
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	<p>It is noted that the Sun Shade Study Methodology provided with the Masterplan includes a comparison with a Proposed District Plan envelope rather than a credible permitted baseline development.</p> <ul style="list-style-type: none"> <li>• A traffic assessment prepared by a suitably qualified Transport Engineer.</li> </ul> <p>The Concept Plans and Stantec Traffic Memo which have been submitted to the Minister for the Environment have been reviewed by the Council’s Transport Engineer RMA who has advised that the proposal is generally acceptable although further information regarding the following would be required:</p> <ul style="list-style-type: none"> <li>- The volume of earthworks</li> <li>- The dimensions of car parking spaces and servicing parks</li> <li>- Any traffic calming measure proposed</li> <li>- Driveway gradients</li> <li>- Visibility of pedestrian crossing at the top of the ramp from the basement car park</li> <li>- The potential location of bike storage and EV parking</li> <li>- Details of frequency of servicing vehicles and rubbish collections.</li> </ul> <ul style="list-style-type: none"> <li>• A landscape/visual effects report including information to be able to assess bulk and dominance on adjacent properties.</li> <li>• An Earthworks Plan showing the extent of the earthworks, including the cut area(s) and cut height(s), the fill area(s) and depth(s) and the retaining walls or batters.</li> <li>• An assessment of the project’s servicing strategy in respect to stormwater, water supply, and wastewater.</li> <li>• An assessment against the relevant objectives and policies of the Operative and Proposed District Plans.</li> </ul> <p><b>3. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your city ?</b></p> <p>The Council is not aware of any environmental regulatory compliance issues relating to Metlifecare Retirement Villages Limited in Wellington City.</p>
<p><b>Other considerations</b></p>	<p>There are no other known relevant matters that the Minister needs to be aware of.</p>

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