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: PLIMMERTON FARM STAGE ONE
Application number: PJ-0000858
Date received: 07/02/2023

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: KM AND MG HOLDINGS LIMITED

Contact person: AARON PORTLAND

Job title: DEVELOPMENT MANAGER

s 9(2)(a)

s 9(2)(a)

Postal address:

5 Gibbons Street, Upper Hutt, 5018

Address for service (if different from above)

Organisation: SCOPE PLANNING LIMITED (AGENT)

Contact person: STEPHANIE BLICK

Job title: PRINCIPAL PLANNER

s 9(2)(a)

s 9(2)(a)

s 9(2)(a)

Postal address:

L2 / 12 Allen Street, Te Aro, Wellington

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.

James Street, Plimmerton, Wellington, 5026, New Zealand

Legal description(s):

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

Pt Lot 30 DP 328137

Registered legal land owner(s):

KM AND MG HOLDINGS LIMITED

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:

THE APPLICANT IS THE LAND OWNER

Part III: Project details

Description

Project name: PLIMMERTON FARM STAGE ONE

Project summary:

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

The Project is 'Stage One' of the Plimmerton Farm development and comprises a mix of standalone, terrace and apartment housing resulting in between 880 - 1050 new dwellings and associated earthworks, infrastructure and access, as well as wetland restoration and flood mitigation works and the provision of future development lots.

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.

REFER SECTION 4 OF THE REFERRAL APPLICATION FOR DETAILED PROPOSAL INFORMATION. KEY ELEMENTS OF THE PROPOSAL ARE DETAILED BELOW

The Project aligns with the overall masterplan for Plimmerton Farm that is based on the Plimmerton Farm Precinct Plan and was developed by the project team to inform the staged resource consents and to assist with engagement. See link here to video that was prepared to assist the landowner convey its aspirations for the site: https://vimeo.com/718032768/ac6309b4fa

In summary, the key elements of the Project are as follows:

1. Land use to construct between 880 - 1050 residential units.
2. Land use to undertake bulk earthworks, including undertaking earthworks within 10m of a natural inland wetland;
3. Land use to construct infrastructure servicing associated with the subdivision and development, including roads, parking, and three waters infrastructure including a new water reservoir and the creation of stormwater detention basins.
4. Creation of both public and private open space areas including large public reserves areas proposed to be vested with PCC (subject to agreement by PCC);
5. Land use consent to clear vegetation within a Significant Natural Area to, among other things, construct a road in accordance with the Plimmerton Farm Precinct Plan;
6. Land use consent and discharge permits to reclaim natural inland wetlands associated with urban development;
7. Wetland offsetting and restoration works to restore existing wetlands and create new wetland areas and to ensure 'no net loss' of wetland extent and values; and,
8. Subdivision to create residential lots, road and reserve lots to vest and future development lots.

HOUSING

The Project seeks to construct between 880 – 1050 dwellings across 9 development stages. Approximately 880 residential units will be delivered within stages 3, 4, 6, 7, 8 and 10 as outlined in the detailed architectural plans attached in **Appendix Three**, and a further 170 residential units are estimated within stages 5, 9 and 11. While the individual residential units and allotment layout have not been designed for stages 5, 9 and 11 to the same fine-grain detail as the other stages, yield within these stages has been estimated based on the preliminary roading design and the underlying masterplan. In order to include the development of these stages in this referral, the necessary earthworks and infrastructure to support development within these stages has been included in the proposal.

HOUSING TYPOLOGIES AND TENURE

Housing typologies include standalone, detached, terraced and apartment typologies as outlined in **Table Three** of the referral application. In addition, some vacant allotments will be provided to sell to other building companies. Development plans, housing typology plans, block plans and renders and typology schedules are provided in **Appendix Three**.

SUBDIVISION

The proposed subdivision will create:

1. Between 880 - 1050 residential allotments.
2. Road allotments to vest that includes the main gateway /entry road to future stages;
3. Road allotments that will either be vested or become jointly owned access lots held in shared ownership by the applicable residential allotments
4. Reserve lots whereby some may be vested with Council as local purpose reserves and some may be held in ownership by a future residents association or owned by neighbouring lots;One allotment that will accommodate a future commercial hub;
5. One allotment that will accommodate a future primary school;
6. One allotment that will accommodate a future retirement village; and,
7. Two future development lots (stages 12 and 13) that will be earthworked to ensure a cut/fill balance on site. Development of these allotments will be subject to future resource consents.

ACCESS AND ROADING

As further described in the *Transport Assessment* attached in **Appendix Eight**, the key transport components that are proposed to support the Project are summarised as follows:

- All vehicular access to and from the Stage One site is proposed off James Street, with the new site access road lending itself to a priority change, with traffic travelling between the roundabout and the Site having priority;
- A series of new internal roads including a main north-south spine connection off James Street that will in turn connect with a series of local roads and neighbourhood streets that distribute traffic across the various development areas;
- Provision for active mode users including roadside footpaths, shared paths, as well as off-road walking and cycling trails that provide more direct connection between development areas; and,
- Provision of a controlled pedestrian / cycle crossing on SH59 to the south of the James Street roundabout, to facilitate safe active mode connection between the Site and the nearby Plimmerton rail station / shopping area; and,
- A subdivision design and creation of a lot to provide potential future access to an adjacent rural block that falls within the Northern Growth Area.

INFRASTRUCTURE SERVICING

Wastewater

- A new sewer reticulation network is required for the Stage One development aligning with the proposed road network and avoiding sensitive wetland areas. All allotments will include a connection at the boundary as per WWLs Regional Standard.
- Wastewater generated by the development will be managed to ensure that the Stage One development does not exacerbate capacity issues within the existing wastewater network. To do this a detention tank with approximately 1000m3 of capacity will be required for Stage One to provide 12 hours of average dry weather flow (ADWF) storage, plus an additional 8-hour buffer for resilience and maintenance requirements. The tank will be sited at the south-west of the Stage One area comprising a single tank structure or connected cellular structures. Refer tank location provided in Figure 5 of the *Infrastructure Memo*.
- The wastewater detained in tanks will be gradually discharged to the downstream network at controlled volumes outside the times of peak flow in the existing trunk main.

Potable Water

- A new reservoir will be constructed to service the entirety of Stage One development. The reservoir will have a total storage of 3.35Ml / 3,350m3 and will be located at an RL of approximately 115m.
- Trunk potable water mains within the development will connect from the reservoirs to supply the Stage One development. Connections will be made to neighbouring networks (e.g. Mo Street to Camborne Reservoir) to

allow for integrated management of the water networks by Wellington Water. The transmission main will feed into principal mains and rider mains laid on every new proposed road.

- The bulk transmission main supplying the reservoir will connect to the GWRC transmission mains on SH59, with new pumps installed to supply the reservoirs.
- The proposed reservoir site will also facilitate future development of subsequent site stages with space to construct a second reservoir, or a larger single reservoir at Stage One (up to 6.2Ml capacity).

Stormwater – Hydraulic Neutrality

- Hydraulic neutrality for this site is the reduction of peak flows for events up to the 100-year ARI event. It also includes maintaining the frequency of existing channel forming flows (low return period events, 2-year ARI, PC18 Freshwater Principles SWMP30). Hydraulic neutrality will be designed based on the stormwater management and freshwater principles in the Plimmerton Farm Zone Chapter of the District Plan.

Stormwater – Flood Hazard Mitigation

As further described in Section 6 of the Infrastructure Memo, a portion of the Stage One development area currently experiences inundation during large flood events. To prevent impact on downstream properties, removal of flood storage within low lying zones due to roading or development will require compensatory storage in addition to increased runoff from the Stage One development. A 6.8ha flood detention zone is proposed and will form a significant part of the stormwater strategy to ensure hydraulic neutrality for the Stage One development. This area will be accommodated within the proposed wetland restoration area that will be able to function as a natural wetland given that no stormwater treatment functions are proposed in this area.

Stormwater – Treatment

Stormwater treatment measures are proposed to be implemented on a superlot basis near to source. Treatment devices will be designed based on the Freshwater Principles in the Plimmerton Farm Zone chapter of the Operative District Plan.

Other key proposal elements include earthworks, vegetation clearance and significant ecological offsetting and mitigation works including the creation of large 6.8ha wetland area.

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

Subject to consents being granted in a timely manner and uptake assumptions being in alignment with market and housing needs data, the development will commence on site in early 2024 with completion in 2031.

In summary, the anticipated timeframes for development are as follows:

- Planning Fast Track and EPA process – 9 Months (February 2023 – December 2023)
- Detailed Design and Council Engineering Approvals – 6 Months (January 2024 – June 2024)
- Civils and Earthworks – undertaken in stages commencing December 2023
- Housing Construction – undertaken in stages commencing April 2024 (stages 2, 3 and 4 adjacent to Road 01). Refer **Table Three**

The draft housing completion programme is outlined in **Table Three** of the referral application and is based on the master Stage One programme prepared by the project engineer. The table outlines both housing construction and allotment titling identifying that houses will be occupied on freehold titles from 2025.

Consents / approvals required

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

Resource consent(s) / designation required:

Land-use consent, Subdivision consent, Discharge permit

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
Pt Lot 30 DP 328137	PORIRUA CITY OPERATIVE DISTRICT PLAN	PLIMMERTON FARM ZONE	PRECINCT A	SIGNIFICANT NATURAL AREAS BIODIVERSITY OFFSETTING RESTORATION AREAS

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
OPERATIVE PORIRUA CITY DISTRICT PLAN	Rule SUBPFZ-R2	All subdivisions where compliance is achieved with standards SUBPFZ-S1 - SUBPFZ-S5.	Restricted Discretionary	Lot 2 DP 489799
OPERATIVE PORIRUA CITY DISTRICT PLAN	Rule SUBPFZ-R3(2)	Subdivision of a site containing an SNA, area of terrestrial indigenous biodiversity or BORA where compliance is not achieved with SUBPFZ-R3-1(b). Access to the building platforms is located within an identified BORA area.	Discretionary	Lot 2 DP 489799
OPEARTIVE PORIRUA CITY DISTRICT PLAN	Rule TRPFZ-R3(1)	New roads and private ways that comply with transport standard TRPFZ-S1.	Restricted Discretionary	Lot 2 DP 489799
OPEARTIVE PORIRUA CITY DISTRICT PLAN	Rule TRPFZ-R1	Resource consent for high-trip generating activity (standard TRPFZ-S13)	Restricted Discretionary	Lot 2 DP 489799
OPERATIVE PORIRUA CITY DISTRICT PLAN	Rule TRPFZ-R3(2)	Earthworks where compliance is not achieved with EWPFZ-R1-1	Restricted Discretionary	Lot 2 DP 489799
OPERATIVE PORIRUA CITY DISTRICT PLAN	Rule ECOPFZ-R1(3	Removal of vegetation within SNA	Restricted Discretionary	Lot 2 DP 489799
OPERATIVE PORIRUA CITY DISTRICT PLAN	Rule PAPFZ-R2	Residential Building Activity (required for minor bulk and location infringements that may be witnessed on individual lots)	Restricted Discretionary	Lot 2 DP 489799

OPERATIVE PORIRUA CITY DISTRICT PLAN	Rule PAPFZ-R3	Impervious surfaces except roads	Restricted Discretionary	Lot 2 DP 489799
GWRC NATURAL RESOURCES PLAN	Rule R101	land use consent for the use of land, and the associated discharge of sediment-laden runoff stormwater into water or onto or into land where it may enter water from earthworks not permitted by Rule R99 or vegetation clearance on erosion prone land that is not permitted by Rule R99 or Rule R100.	Discretionary Activity	Lot 2 DP 489799
GWRC NATURAL RESOURCES PLAN	Rule R52A	Discharge permit for the discharge of stormwater from a new subdivision or development into water, or onto or into land where it may enter a surface water body or coastal water, including through an existing local authority stormwater network, that is not permitted by Rule R48A.	Restricted Discretionary	Lot 2 DP 489799
GWRC NATURAL RESOURCES PLAN	Rule R53	Discharge permit for the discharge of stormwater, including stormwater that may be contaminated by wastewater into water or onto or into land where it may enter water that is not permitted by Rules R48, R48A or R49, or controlled by Rule R50, or a restricted discretionary activity under Rules R51, R52 or R52A.	Discretionary Activity	Lot 2 DP 489799
GWRC NATURAL RESOURCES PLAN	Rule R118	Activities in wetlands	Non-Complying	Lot 2 DP 489799
NES-F	Regulation 45C	1. Vegetation clearance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it is for the purpose of	Restricted Discretionary Activity	Lot 2 DP 489799

		constructing urban development. 2. Earthworks or land disturbance within, or within a 10 m setback from, a natural inland wetland is a restricted discretionary activity if it is for the purpose of constructing urban development. 3. Earthworks or land disturbance outside a 10 m, but within a 100 m, setback from a natural inland wetland is a restricted discretionary activity if it— a) is for the purpose of constructing urban development; and b) results in, or is likely to result in, the complete or partial drainage of all or part of the wetland. 4. The taking, use, damming, or diversion of water within, or within a 100 m setback from, a natural inland wetland is a restricted discretionary activity if— a) the activity is for the purpose of constructing urban development; and b) there is a hydrological connection between the taking, use, damming, or diversion and the wetland; and c) (c)the taking, use, damming, or diversion will change, or is likely to change, the water level range or hydrological function of the wetland. 5. The discharge of water into water within, or within a 100 m setback from, a natural inland wetland		

		is a restricted discretionary activity if— a) the discharge is for the purpose of constructing urban development; and b) there is a hydrological connection between the discharge and the wetland; and c) the discharge will enter the wetland; and d) the discharge will change, or is likely to change, the water level range or hydrological function of the wetland.		
NES-F	Regulation 57	Reclamation of a river	Discretionary Activity	Lot 2 DP 489799
NES-F	Regulation 71	Placement and use of a culvert	Discretionary Activity	Lot 2 DP 489799

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 MADE WITH RESPECT TO THE PROPOSED DEVELOPMENT.
REFER CONTEXT AND BACKGROUND INFORMATION IN THE REFERRAL APPLICATION.

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

NOT APPLICABLE

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:

The following authorisations will be sought:

- KMMGH will obtain an Archaeological Authority from Heritage New Zealand Pouhere Taonga ahead of commencing works on the site.
- A Wildlife Act Authority from Department of Conservation will be sought by the Applicant if, through further ecological assessment of the proposal (including a further survey for native lizards), it is found that the Project will require activities to be undertaken within habitat that may support native lizards and where activities may result in a significant impact on a species or habitat.

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.

Refer development programme included with the application. Also included is a housing completion table that outlines when houses will be constructed and allotments titled. In summary, the anticipated timeframes for development are as follows:

- Planning Fast Track and EPA process – 9 Months (February 2023 – December 2023)
- Detailed Design and Council Engineering Approvals – 6 Months (January 2024 – June 2024)
- Civils and Earthworks – undertaken in stages commencing December 2023
- Housing Construction – undertaken in stages commencing April 2024 (stages 2, 3 and 4 adjacent to Road 01). Refer **Table Three** of the Referral Application.

Part IV: Consultation

Government ministries and departments

Detail all consultation undertaken with relevant government ministries and departments:

WAKA KOTAHI NEW ZEALAND TRANSPORT AGENCY

Formal correspondence has been 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. Further correspondence will be undertaken with Waka Kotahi with respect to the pedestrian connections across the State Highway.

MINISTRY OF EDUCATION

Correspondence with Ministry of Education staff in relation to the future primary school site has been ongoing for a number of years. The proposed allotment has been designed to ensure MoE requirements 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.

KAINGA ORA

Kainga Ora has been engaging with KMMGH regarding the Plimmerton Farm site since 2020. Discussions regarding potential opportunities within the Stage One development (that is subject to this referral) are ongoing.

Local authorities

Detail all consultation undertaken with relevant local authorities:

PORIRUA CITY COUNCIL

Correspondence has been undertaken with PCC on all levels including senior executives and regulatory officers. As noted earlier, KMMGH advised both the PCC and GWRC that the Stage One application would be lodged as soon as the Minister for the Environment decision on the SPP was released.

Correspondence with PCC included a Stage One workshop in May 2019 where a previous iteration of the development plans was presented to Council officers and experts by KMMGH representatives, Lauren White (project urban designer), Stephanie Blick (project planner) and the former project ecologist (Paul Blaschke – now retired) and project engineers.

More recently the project engineers have engaged with PCC officers in conjunction with WWL staff regarding the servicing of the Stage One development. KMMGH representatives also worked closely with PCC on their application for funding of infrastructure for the Northern Growth Area.

A copy of this referral application has been sent to PCC officers to allow for review and comment ahead of receiving the application formerly from MfE.

GREATER WELLINGTON REGIONAL COUNCIL

Both formal and informal correspondence has been undertaken with the GWRC. A number of Pre-application meetings were undertaken with relevant GWRC officers and expert advisors in 2018 and 2019 when the Stage One plans were been progressed concurrently with the SPP.
These discussions predated the NES-F so included discussions regarding potential wetland reclamation and associated offsetting. Correspondence included site visits with project team experts and GWRC experts to confirm the extent and values of wetlands and the delineation of streams, intermittent streams, highly modified streams and drains.
It is noted that GWRC provided a letter of endorsement with PCC's application to MfE for the SPP and submitted in support of the plan change that rezoned Plimmerton Farm.
Recent correspondence with GWRC has related to the request for clarification regarding whether the new NES-F regulations prevail over the Natural Resources Plan ("NRP") rules. At the time of writing this has not been provided.

Other persons/parties

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

To assist with stakeholder engagement and to articulate the landowners aspirations for Plimmerton Farm, a video was prepared. See link here: https://vimeo.com/718032768/ac6309b4fa. The video is based on the Plimmerton Farm Precinct Plan and the subsequent development plan so is an accurate visualisation of the ecological retention, enhancement and offsetting works that are proposed to be delivered across Plimmerton Farm.

Detail all consultation undertaken with the above persons or parties:

NA

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
Ngati Toa Rangitira	Consultation via the plan change and a Stage One workshop with the Ngati Toa taiao team in 2019. Ngati Toa prepared a CIA to support the plan change and lodged a submission in support of the plan change. This application has been sent to Ngati Toa for review.

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.

NA

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.

NA

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.

NA

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.

REFER DETAILED ASSESSMENT OF THE FOLLOWING ADVERSE EFFECTS IN SECTION 4.4 OF THE REFERRAL APPLICATION:

- **Social and economic effects;**
- **Ecological effects;**
- **Landscape and visual effects;**
- **Earthworks and construction effects;**
- **Traffic effects;**
- **Subdivision and servicing effects;**
- **Urban design / residential character and amenity;**
- **Geotechnical effects;**
- **Climate change and natural hazard effects;**
- **Historical and archaeological effects; and,**
- **Cultural effects.**

Summary of the key assessments provided below.

ECOLOGICAL EFFECTS

The *Ecological Assessment* provided by RMA Ecology in **Appendix Six** provides ecological advice with respect to the Project by addressing ecological values, and possible impacts and effects management.

As noted in the *Ecological Assessment*, conceptual design for the site has been an iterative process over a number of years involving RMA Ecology Ltd and the planning and engineering teams, with an acknowledged focus on avoiding adverse effects on features with ecological protection status or of ecological value.
Lot layout and associated infrastructure were laid out around the ecological features of the site, as far as practicable. The development design also recognises that Plimmerton Farm is zoned residential and is intended to be developed for that purpose in accordance with the Plimmerton Farm Precinct Plan and in order to meet national objectives such as the NPS-UD.
In general, through the iterative process, the most valuable ecological features within general vicinity of the site, such as the larger swathes of indigenous vegetation, and the eastern arm of the Taupō Swamp complex are retained (i.e adverse effects are avoided).
The project ecologists identify that, where effects cannot be avoided due to urban design, planning, economic (being development feasibility) and engineering constraints, the affected ecology features are generally of lower value, and the full effects management hierarchy has been applied to ensure that opportunities for remediation and mitigation are considered, as well as offsetting and compensation for residual adverse effects.
The project ecologists have assessed the potential adverse effects on ecological values against the mitigation hierarchy (avoid, remedy, mitigate, offset, compensate), as is required under the RMA, and as is laid out in the Greater Wellington Regional Policy Statement, and the recently revised NPS-FM.
Outlined in Section 3.3 of the Ecological Assessment, the mitigation hierarchy has been applied for the site by –

- *Avoidance, through an extensive and iterative design has been discussed previously in this report;*
- *Remediation, especially where batter slopes or cuts remove indigenous vegetation, and which can be replanted following engineering works; and*
- *Mitigation, which will include the salvage of native fish and wildlife from clearance areas, undertaking clearance outside of the native bird breeding season where feasible, and implementing erosion and sediment control measures in line with the operative Plan Change 18 Plimmerton Farm provisions in the operative Porirua District Plan and regional standards in order to prevent sediment discharges to waterways. Revegetation to replace nearby vegetation clearance could be considered mitigation (cf. offsetting) if undertaken near to and connected to the same patch of native shrubland or forest.*

Residual effects that are not avoided, remedied or mitigated, are proposed to be offset onsite within other parts of the Plimmerton Farm area where forests, shrubland, streams and wetlands exist with potential to restore degraded ecological values.
An assessment of the offsetting approach undertaken against the GWRC offsetting principles is provided in Table 2 of the *Ecological Assessment* where it is outlined that these principles can be achieved.
Table 3 of the Ecological Assessment provides a summary of the conservative and precautionary ratios and multipliers that will be used to determine the scale of offset required given the state and condition of ecological values that are proposed to be impacted. The results of this analysis, together with RMA Ecology determining suitable offset locations across the wider Plimmerton Farm site provide the assurance that there are sufficient areas within the Plimmerton Farm site that can be restored and protected to offset the level of impacted values to a non-net-loss or greater level of management. In other words, under the effects management hierarchy framework and offset accounting approach for restoration, there will be no-net-loss, and most probably a clear net-gain for ecology across the site.
For this referral application, the project ecologists confirm that –
unavoidable, residual, adverse, effects on ecology values can be offset to the standard advocated in this GWRC guidance, without the need to develop biodiversity compensation programmes.
And –
Avoidance of the majority of ecological features (including the highest value features) in combination with an offsetting programme that can be facilitated onsite will ensure that there will be a no-net-loss of ecological values.
Ultimately the project ecologists conclude the following:
From our involvement in the iterative design process, and from our knowledge of the site and its ecological values, we are of the view that the proposed development within the site will be undertaken to avoid the highest value ecological features. Where residual adverse effects remain after avoidance, remediation and mitigation, onsite offsetting will be applied so that there is no-net-loss of ecological values.

The development of the site offers the opportunity to significantly enhance degraded ecological values, that may not otherwise occur under the current land use. This includes the restoration of the large low-lying area of pasture adjacent to State Highway 59 into a wetland that resembles pre-human composition and function.
Overall, there are a range of accepted management tools, and available opportunities on the site to appropriately address, and where necessary mitigate and offset, the potential adverse ecological effects associated with the proposed development designs.

EARTHWORKS AND CONSTRUCTION EFFECTS

As noted in the referral application, the Project requires earthworks to create building platforms, roading, associated batters, installation of infrastructure and the formation of stormwater detention basins.
The fast-track resource consent application will be accompanied by a Draft Earthworks and Construction Management Plan ("ECMP") that will address the following:

- Final earthworks volumes and earthworks methodology;
- Construction hours;
- Construction noise;
- Construction traffic management;
- Erosion and sediment control;
- Dust control; and,
- Complaint management.

Earthworks effects will relate to their visual impact, erosion and sediment control and dust management. These effects are outlined below.
Erosion and sediment control
As noted, the resource consent application will include an earthworks methodology together with a Draft ECMP that will include erosion and sediment control plans and details including the sizing, location, maintenance and monitoring of the erosion and sediment control devices.
The erosion and sediment control methods will reference to the *"Plimmerton Farm Erosion and Sediment Control Principles"* in the Plimmerton Farm Precinct Plan of the Operative District Plan that were developed specially to manage earthworks on the Site given sensitive environments in proximity to the Site, including Taupo Swamp. These principles adopt a higher level of protection and erosion and sediment control management than city-wide District and Regional Council guidelines. They represent "better than best practice".
Measures related to erosion control will be designed to slow down stormwater flows, dissipate energy, reduce the overall amount of sediment generated from exposed areas of earthworks, and decrease the overall volume of sediment transported to the sediment control devices. The measures likely to be employed include runoff diversion channels, clean water diversion channels, check dams and drop out pits, amongst others.
Sediment control will be managed by devices designed to reduce the loading of sediment discharged into the Site and wider environment, by allowing sediment to settle before it is discharged. The measures to be employed include sediment retention ponds, decanting earth bunds and silt fences, amongst others.
The project engineers are confident that any potential erosion and sediment control effects can be appropriately mitigated on site via adherence to the principles and proffered consent conditions.

ACCESS AND TRAFFIC EFFECTS

The proposed access and roading through the site have been designed to meet Council standards including the Plimmerton Farm road typologies adopted as part of the Plimmerton Farm SPP. It is anticipated that the proposed road network will be vested with the District Council as public roads.
Stantec provided traffic engineering input into the design and layout of the Project and prepared a traffic assessment report to evaluate the potential access and traffic effects of the Project (refer Appendix Eight). The report concludes the following:
The inclusion of the Site in the Council's Northern Growth Area and recent rezoning through Plan Change 18 to allow residential subdivision activity, signals the intent for extension of the existing suburbs of Plimmerton and Camborne north through the Site. The 880 new dwellings to be delivered by the proposal represents a significant contribution to the required new housing stock identified by the Council's PGS.
Recent investment in the strategic transport infrastructure of Transmission Gully Motorway has led to a step-reduction in traffic on the roads in the vicinity of the Site, which presents an opportunity to accommodate new development growth without requiring significant roading upgrades.

The Site's proposed transport infrastructure and associated connection to the external network will ensure a safe and appropriate outcome can be achieved for all transport modes, noting the proximity of the Plimmerton rail station strongly supports sustainable travel choice.

From a transport perspective, the effects of the additional traffic activity generated by the proposed residential development of land within the Site can be appropriately avoided, remedied, or mitigated. As noted, it is not anticipated there would be any significant adverse effects warranting substantial mitigation arising from the introduction of the development traffic on the adjacent network.

The application will be supported by an Integrated Transportation Assessment ("ITA") that will address traffic effects during construction and following completion of the development. The ITA will also record consultation that will be undertaken with Waka Kotahi with respect to access to the State Highway.

SUBDIVISION AND INFRASTRUCTURE SERVICING EFFECTS

The project engineers have confirmed that the site can be adequately serviced with water supply, wastewater disposal, stormwater disposal and telecommunications. The proposed stormwater, wastewater and water reticulation will be designed to Council and Wellington Water Limited standards. The final infrastructure design will be developed in consultation with PCC and WWL to achieve an acceptable outcome with regard to the PCC's District Plan and other standards.

The project engineers conclude in the Infrastructure Memo that –

In summary, it is our view that the site can be developed and adequately serviced subject to further engineering design, and that this can be addressed through future consents. Further, no bulk off-site infrastructure upgrades appear to be necessary to support the development at this stage.

The resource consent application will include an Infrastructure Report that provides full details of the proposed servicing of the Project. In addition, a Stormwater Management Plan will outline how stormwater will be appropriately managed on the site.

URBAN DESIGN / RESIDENTIAL CHARACTER AND AMENITY EFFECTS

The layout of the Project is consistent with the Plimmerton Farm Zone residential standards for Precinct A and provides a variety of choice through lot size, dimension, and orientation. Efficient roading networks, reserve networks and pedestrian and cycle networks are all integral components of the layout design which contribute to the residential character of the Project.

The Project has been based on the Plimmerton Farm Precinct Plan and the subsequent masterplan prepared by Lauren White of Urban Acumen. To support the referral application, Ms White prepared an *Urban Design Report* – refer **Appendix Four**. In summary, Ms White concludes the following:

The development proposed in the referral application is a product of an integrated design-led process which has sought to respond to site-specific opportunities and constraints and balance residential yield and landscape and biodiversity values. It represents a new, ambitious and contemporary neighbourhood that extends housing choice in Porirua and offers a wide variety of housing typologies and designs, promoting a mixed community and enhances landscape values of large areas of adjacent open space and wetlands.

The design is consistent with respect to the Operative District Plan and further current and future national and regional directions relating to increasing residential density/yield in appropriate locations. The intentions for Precinct A as described and permitted in the Plimmerton Farm Zone are consistent with outcomes described by the National Policy Statement on Urban Development (2020), the Proposed District Plan and the National Medium Density Standards.

This assessment is based on the proposed development plans and catalogue of housing designs. Many urban design outcomes can only be assessed at a more detailed design and consenting stage (Fast Track Stage 2) but initial assessment has indicated close alignment with direction and guidelines, both operative and proposed.

The proposal will enable a sustainable and well-functioning urban environment, with good residential density based around a local centre and public transport infrastructure and has the potential to establish a strong gateway to the rest of Plimmerton Farm.

Recognising this project is currently at an advanced conceptual stage, a number of urban design issues will be refined and resolved during the next stage of planning and design. This notwithstanding, these plans and drawings describe a robust and complete concept and the approach that will be taken to deliver a suitably high amenity outcome in all areas.

On this basis, it is considered that the development will not give rise to adverse urban design related effects. While further design refinement is required, there are no critical urban design issues that remain unresolved. In conclusion,

the proposal can be supported from an urban design perspective and offers an exciting opportunity to deliver a quality urban design outcome that sets a high benchmark for future development stages.

HISTORIAL AND ARCHAELOGICAL EFFECTS

An archaeologist is currently undertaking an archaeological assessment of the site. The final design of the development and consent application will incorporate any recommendations made as part of the assessment. In addition, separately to the resource consent process, the Applicant will obtain an Archaeological Assessment under the Heritage New Zealand Pouhere Taonga Act 2014.

CULTURAL EFFECTS

Ngāti Toa Rangatira provided a Cultural Impact Assessment ('CIA") to inform the now operative Plan Change, a letter of support with respect to the streamlined plan change process and a submission in support of the Plan Change. In addition, Ngāti Toa Rangatira were involved in the development of the Plimmerton Farm Freshwater Principles that are now included in the Operative District Plan.

In response to the CIA and involvement of Ngāti Toa Rangatira throughout the development of the Plan Change, the Plimmerton Farm Zone Chapter in the Operative District Plan includes:

- Freshwater principles including specific mana whenua principles;
- Requirements to adhere to the Te Rūnanga o Toa Rangatira Accidental Discovery Protocol (provided as an appendix to the earthworks section of the chapter);
- Provisions that require earthworks applications to detail how earthworks will be managed to recognise and provide for Te Mana o te Wai in receiving waters;
- Provisions that permit cultural harvesting; and,
- Provisions relating to the protection of two trees.

A copy of this application has been sent to Ngāti Toa Rangatira for review.

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:

REFER FURTHER ASSESSMENT IN THE REFFERAL APPLICATION (SECTION 4.5)

NPS-UD

The provision of 880 - 1050 new dwellings over the next 6-7 years, will deliver significant development capacity to an area of increasing demand and increasing housing affordability issues. Further, it will enable more people to live in an urban environment which is close to a suburban centre that is continuing to undergo significant change and improvement and where, based on population projections and the shortfall in land supply, there is high demand for housing relative to surrounding areas or other areas of the District.

The location and layout of the Project, as well as pedestrian and cycle connections, are intended to encourage alternative transport modes which will support reductions in greenhouse gas emissions. The project will also deliver a variety of homes at a range of typologies and prices (including affordable housing) to meet the needs of different households.

For these reasons, the Project is consistent with the objectives and policies in the NPS-UD. The NPS-UD is considered to provide the overarching policy direction for proposals which provide significant development capacity.

Refer further assessment in the referral application and the *Economic Assessment.*

NPS-FM

Given that consents are sought under the NES-F a brief assessment of the proposal against the relevant objectives and policies of the NPS-FM is provided in Table Four of the referral application. In summary, the Project aligns with the objectives and policies of this plan for the following reasons:

- In respect of earthworks, 'better than best practice' sediment control measures are proposed in line with the Plimmerton Farm Erosion and Sediment Control Principles that will ensure that any sediment related effects on waterbodies are appropriately avoided. This addresses the integrated site management in respect of earthworks having 'downstream' effects on nearby waterbodies.

- Effects on freshwater will be minimised via the adherence to the Plimmerton Farm Erosion and Sediment Control Principles and the Freshwater Principles. This will include the implementation of monitoring regimes to monitor impacts on freshwater.
- The avoidance of direct effects of wetlands has been prioritised and where residual adverse effects remain after avoidance, remediation and mitigation, onsite offsetting will be applied so that there is no-net-loss of ecological values.
- The Project will not result in a loss of extent and values of the beds of lakes and rivers and natural wetlands.
- Potential adverse effects on ecological values of the identified natural wetlands on the site have been assessed against the mitigation hierarchy (avoid, remedy, mitigate, offset, compensate), as is required under the RMA, and as is laid out in the Greater Wellington Regional Policy Statement, and the recently revised National Policy Statement on Freshwater Management (NPS-FM).
- Monitoring will be outlined in the fast track resource consent application to ensure any potential changes to wetland hydrology or vegetation are appropriately monitored and addressed to ensure the hydrological integrity of the existing wetlands is maintained.
- With respect to the discharge of operational stormwater, the Project is consistent with the applicable policy framework given the proposed treatment train approach and implementation of Water Sensitive Urban Design ("WSUD") principles. The future resource consent application will include a detailed assessment of the biophysical and sociocultural considerations that have influenced the concept design and selection of appropriate WSUD devices. The assessment will also provide the rationale for device and preferred concept.Stormwater hydrology mitigation is proposed for increases in mean annual exceedance frequency of the 2-year Average Recurrence Interval flow and mean annual volume of stormwater runoff. This includes the creation of a large stormwater detention area that will be integrated with the wetland restoration area;
- The stormwater concept avoids mixing of waters of different catchments;
- Stormwater treatment devices will be appropriately located and designed to ensure continued access for device inspection, maintenance and upgrade.
- A 6.8ha flood detention zone is proposed and will form a significant part of the stormwater strategy to ensure hydraulic neutrality for the Stage One development and to mitigate flood hazard effects. This area will be accommodated within the proposed wetland restoration area that will be able to function as a natural wetland given that no stormwater treatment functions are proposed in this area.

NES-F

An assessment of the Project against the relevant rules of the NES-F is provided in Section 7 below. In summary, if approved, the fast track resource consent application will include seeking consent under the revised NES for stream reclamation, and the reclamation of wetlands diversion of water within 100m of a wetland, and earthworks within and within 10m of a wetland associated with urban development.

Under Regulation 45C(6), a resource consent for a Restricted Discretionary activity under this regulation must not be granted unless the consent authority has first—

(a) satisfied itself that the urban development—

1. *will contribute to a well-functioning urban environment; and*
2. *will provide significant national, regional, **or** district benefits; and*

(b) satisfied itself that—

1. *there is no practicable alternative location for the activity within the area of the development; or*
2. *every other practicable alternative location in the area of the development would have equal or greater adverse effects on a natural inland wetland; and*

(c) applied the effects management hierarchy.

Matters of discretion are provided under Regulation 45C(11), and a brief assessment of the Project against these matters is provided below.

The extent to which -

1. *the urban development will be of significant national, regional, **or** district benefit; and*

Refer *Economic Assessment* where it is stated that the Project will provide significant regional and district benefits.

1. *the activity contributes to a well-functioning urban environment; and*

Refer detailed assessment in Section 4 of the referral application.

1. *there is another practicable alternative location in the area of development for the activity, and the extent to which other practicable alternative locations within the area of development would have equal or greater adverse effects on a natural inland wetland; and*
2. *an alternative configuration or design is practicable that would avoid, minimise, or remedy adverse effects on the natural inland wetland extent and values; and*

As discussed in the referral application, the Stage One proposal has developed via an extensive and iterative process since 2018 whereby effects on wetlands have been avoided where possible and where they haven't been avoided (due to provision of necessary road crossings, road layout and gradients for public transport or to provide viable yield in line with zoning and the Precinct Plan), they have been minimised to the greatest extent possible. This has included avoiding direct and in-direct effects of high-value wetlands.

There are no other practicable alternative locations within the area as the area not proposed for development within Stage One contains high-value wetlands that are proposed to be retained. Refer plans provided in the *Ecology Assessment*. Furthermore and most importantly, there is no other practicable location for this scale of activity outside of Plimmerton Farm as the balance of the Northern Growth Area is not zoned appropriately (i.e. is currently zoned Future Urban).

1. *the effects of the activity will be managed through applying the effects management hierarchy.*

Refer *Ecological Assessment*. Offsetting is proposed as part of the Project in accordance with the effect's mitigation hierarchy and in particular GWRC's recent guidance in relation to this. Final offsetting details will be included in the fast track resource consent application if this referral is approved.

NPS-HPL

The Site is not located in an area of LUC 1-3 soils and has an operative urban zoning and therefore an assessment of the Project against the NPS-HPL is not required.

NES-CS

Not applicable - the site is not contaminated or potentially 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:

ECONOMIC BENEFITS DURING CONSTRUCTION

Construction has historically been a major driver for growth within New Zealand, directly employing about 258,000 people in residential, heavy and civil construction, and constructions services.[1]

Due to the effects of COVID-19, a number of projects have been delayed due to the periods of lockdown New Zealand underwent as a response to the virus. As a result, MBIE conclude that the construction sector will be reliant on a pipeline of fast- tracked consent activity, which will also work as a part of the economic recovery and rebuild following COVID-19. Fast-tracked construction activity (such as this Project) is envisaged to fill the gap in terms of employment and construction activity where funding for private developments may be heavily impacted by the pandemic.

The Project represents an approximate s 9(2)(b)(ii) investment in the local area providing jobs and significant flow-on economic benefits to the local community through the construction phase. Of that investment, between 77% and 88% is expected to remain within the region, with the remaining 12% to 23% being spent within the wider New Zealand economy. This will provide jobs and significant flow-on economic benefits to the local community affected by the economic impacts of COVID-19.

There will be direct benefits for construction workers and project managers, architects, engineers and health and safety consulting service providers. It is estimated over 1,213 FTEs will be employed on the development at any one

time across a range of sectors directly and indirectly on the development. This will result in significant employment opportunities for peoples living in the Porirua District over a sustained period of time.
Additionally:

- The development will deliver between 880 - 1050 new homes into the market, with a focus on delivering a range of tenure types, including standalone housing and more affordable terrace houses and apartments.
- The development of the site will address a significant under supply of housing in Porirua and the Wellington Region – Porirua is experiencing chronic housing affordability issues and while it was historically seen as being affordable, is now unaffordable to most.
- There will also be associated financial and/or development contributions for local councils as part of the development.

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 PDL'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

ECONOMIC BENEFITS POST COMPLETION

The economic impacts of the Project 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.

Refer further assessment in the *Economic Assessment* where economic benefits have been quantified.

[1] Construction factsheet: October 2020, COVID-19 economic update, MBIE.

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

The Project will enable the development of between 880 - 1050 homes in an area that is facing a shortfall in development capacity. As an indication of the current demand, KMMGH have received hundreds of enquires for purchasing within the development.

Against that background, the Project provides for the development of housing to meet the identified shortfall by way of an expansion to an existing residential development in a location identified and zoned by PCC as being appropriate for that purpose. This increase in housing supply will enable the social and economic wellbeing of the community to be maintained and enhanced.

In addition, the employment opportunities enabled by the Project will positively impact the social and economic wellbeing of workers and the communities that will benefit from their employment.

With respect to cultural wellbeing, Ngati Toa Rangitira were consulted extensively during the SPP process that rezoned the site. This application has been sent to Ngati Toa and any further updates on consultation with Ngati Toa Rangitira will be provided to MfE. As required, a Cultural Impact Assessment will be provided with the fast-track resource consent application if the referral application is approved.

As further described in the Economic Assessment, the proposed development is located in an attractive location, offering a wide range of amenities that support residential development. In addition, the Project seeks to enable future education with the provision of a primary School site, a retirement village site, and a site for commercial activities and commercial hub to service the new suburb and existing community.

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 will progress faster than using the alternative RMA processes. Obtaining consent by way of a resource consents under the 'standard' RMA process is expected to take a minimum of 18 months depending on GWRC notification decisions. Subdivision under the standard RMA process would therefore not likely occur until 2028/2029.

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:

As calculated in the *Economic Assessment*, the Project will contribute 1,213 FTEs. Providing employment will have significant flow-on economic benefits to the local community through the construction phases.

Housing supply:

With respect to housing supply benefits of the Project, the *Economic Assessment* makes the following statements:

- *The proposal would increase the range of housing at affordable price points supplied to the market (development average of approximately $780,000) in a location close to a wide range of employment and amenities (supermarket, schools etc.).*
- *There is a relatively low proportion of terrace dwellings (25%) and apartments (0%) consented over the last 5 years in the Porirua City district compared with the Region as a whole. The proposed development is anticipated to provide terrace and apartment housing that will address this comparative shortage.*
- *There is one small scale and two medium-large scale residential developments currently selling within Porirua City, with a total supply of 1,122 new dwellings. Of the total supply, there are approximately 727 dwellings remaining. This equates to 2-3 years of supply based on the annual demand of approximately 335 dwellings per annum, indicating there is a shortage of new residential dwellings resulting in unmet demand in Porirua City.*
- *The proposal would make a notable contribution towards meeting the need for more new housing to enter the market, while increasing competition among developers.*

Contributing to well-functioning urban environments:

Policy 1 of the NPS-UD describes a well-functioning environment as a planned environment that as a minimum have or enable a variety of homes that serve the following functions:

- *meet the needs, in terms of type, price, and location, of different households*
- *enable Māori to express their cultural traditions and norms*
- *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size*
- *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport*
- *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- *support reductions in greenhouse gas emissions*
- *are resilient to the likely current and future effects of climate change*.

Under new Regulation 45C of the NES-F (relating to wetland reclamation associated with urban development), a resource consent for a Restricted Discretionary activity under this regulation must not be granted unless the consent authority is satisfied that, among other things, the Project will contribute to a well-functioning urban environment. If approved, the fast-track consent application will include a detailed assessment of the Project against Policy 1. However, for completeness, the concept of 'well-functioning urban environments' has been canvassed by the project team as further detailed in the accompanying technical reports. In summary the project team have confirmed that:

- The proposed housing typologies will meet the housing needs of different households, including affordable houses;
- Enables future commercial activities that are suitable for different business sectors in terms of location and site size (refer *Economic Assessment* for further assessment);

- The Project would 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, are intended to encourage alternative transport modes which will support reductions in greenhouse gas emissions.
- The Operative Plimmerton Farm Zone in the District Plan provides for cultural harvesting on the site as requested by Ngati Toa Rangatira.
- Resilience to climate change is catered for by the engineering design which accounts for the 1:200 year and 1:500 year flood events.

The *Urban Design Assessment* states that aspects of the Project which contribute to achieving well-functioning urban environment include:

- *the inclusion of a wide variety of housing types, including detached dwellings, duplexes, terraces and low rise apartments, which promote housing choice, social resilience and a broad demographic*
- *site and housing typologies which promote affordability*
- *an overall residential density which maximises potential residential yield in close proximity to public transport infrastructure while responding to site constraints such as topography and ecological values*
- *a connected road network that can accommodate walking, cycling and bus services to promote public transport and reduce green house gas emissions associated with individual car use*
- *provision/support for a local centre development block which can promote accessibility to local jobs and services*
- *the provision of a range of open spaces, both active public open space as well as passive open spaces accommodating trails and providing visual relief/outlook for residents*
- *the retention of significant native bush and some natural drainage corridors, civil design to address extreme flood events and a water sensitive design approach to stormwater*

The Urban Design Report concludes that *"the proposal will enable a sustainable and well-functioning urban environment, with good residential density based around a local centre and public transport infrastructure and has the potential to establish a strong gateway to the rest of Plimmerton Farm"*

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

All on site infrastructure will be paid for the developer and this will be set out in a future development agreement with PCC.

This will support local public growth infrastructure, public community reserves (including environmental initiatives) and employment from infrastructure and reserve projects.

Refer infrastructure servicing details in the referral application.

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

FRESHWATER QUALITY

Site investigations undertaken by the project ecologists has determined that the induced wetlands have low ecological value, as they are dominated by exotic and terrestrial vegetation.

The Project seeks to preserve high value wetlands on the Site and offers possibility for enhancement. The Project would result in changes to improve the hydrology of the retained wetlands to make them wetlands in perpetuity. In addition, the creation of the enhancement wetlands which will also perform the function of stormwater detention, may result in an overall improvement in wetland habitat provided by the Project.

The Ecological Assessment identifies that there are ample opportunities for the protection and restoration of streams and wetlands across the wider Plimmerton Farm, including within the site. In relation to streams, for the Fast Track Application assessment, stream offsetting will follow good practice guidelines, including an objective calculation for determining the extent of offsetting required, such as through application of the Stream Ecological Valuation (SEV) method.

The specific methodology applied for the SEV is detailed in the Auckland Council technical report 2016/023 for intermittent streams (Neale et al. 2016)[4] and for permanent streams (Storey et al. 2011)[5]. The following hierarchy will be applied for identifying stream offset locations:

1. "Like for like" replacement of stream type, extent and condition;
2. Highly degraded streams; and
3. Streams that provide opportunities to join fragments of riparian vegetation.

The results of the analysis undertaken by the project ecologists confirm that there are sufficient areas on the broader Plimmerton Farm site that can be restored and protected to offset the level of impacted values to a no-net-loss or greater level of management. That is, under the effects management hierarchy framework and offset accounting approach for restoration, there will be no-net-loss, and most probably a clear net-gain for ecology across the site.

With respect to water quality of streams, potential effects on stream ecology relate to the control of stormwater and sediment from the Site, and management measures to address high rainfall events. There is a low likelihood that management measures will prove inadequate during such an occurrence as they will be over-sized to provide for climate change, and subject to appropriate monitoring and maintenance. This will be outlined in the ecology assessment that will accompany the resource consent application if the referral is approved.

Effects on aquatic fauna may stem from discharge events, though unlikely. Appropriate site management techniques can sufficiently mitigate the risk of such events occurring and this will be detailed in an EIBMP that will be provided with the resource consent application.

A Stormwater Management Plan ('SMP') will also be prepared in support of the application if the referral is approved and will address potential effects on the site and outline the approach to stormwater management. The resource consent will proffer a consent condition that requires implementation of and adherence to the SMP.

INDIGENOUS BIODIVERSITY

As noted, resource consent is sought to remove vegetation within SNAs identified on the planning maps and new SNA areas assessed by the project ecologists (that have no formal protection under the Operative District Plan). Offsetting is proposed to offset the loss of indigenous biodiversity values.

As outlined in the Ecological Assessment, offsetting for loss of shrubland, forest and native species habitat will apply one or more of the commonly used terrestrial offset tools, including the Department of Conservation (DOC) Biodiversity Offset Accounting Model6, or the Biodiversity Compensation Model (BCM) approach.

Table 3 of the Ecological Assessment details the indicative extent of offsetting that will be incorporated into the Proposal. Sites were deemed suitable for offsetting loss of indigenous vegetation where they were outside of PCC SNAs, SNA-qualifying vegetation, wetlands, and the proposed area for creation of wetland extent, and will not be affected by the proposed or future planned earthworks.

The results of this analysis provide assurance that there are sufficient areas on the broader Plimmerton Farm site that can be restored and protected to offset the level of impacted values to a no-net-loss or greater level of management. That is, under the effects management hierarchy framework and offset accounting approach for restoration, there will be no-net-loss, and most probably a clear net-gain for ecology across the site.

Minimising waste:

Waste minimisation aligning with PCC and GWRC's waste minimisation programmes as well as the wider Wellington Region Waste Management and Minimisation Plan will be outlined in the fast track consent application.

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):

If realised, the Project will assist in facilitating a reduction in greenhouse gas emissions compared to what would otherwise result if that housing capacity was delivered further afield (including all other properties within the Northern Growth Area), by providing housing capacity in close proximity to community infrastructure and employment opportunity, and providing infrastructure which will encourage alternative, low-emissions forms of transport.

Also, climate change effects such as an increase in extreme weather events including storms has been taken into account in the design of the development. The stormwater concept will be designed to the Council standards, with the general design to a 10% AEP rainfall level including 20% increase for climate change. Climate change will also be taken

into account in the sizing of the design and sizing of sediment control devices including the Decanting Earth Bunds (DEBs) and Sediment Retention Ponds (SRPs) and the associated catchments of these devices. Also, freeboard levels will be set at levels that are compliant with the NZ Building Code.

Promoting the protection of historic heritage:

An archaeologist undertook an archaeological assessment of Plimmerton Farm and there are no features identified within the Stage One site. Irrespective, KMMGH will obtain an Archaeological Assessment under the Heritage New Zealand Pouhere Taonga Act 2014 at the time of the fast track resource consent application.

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

The GWRC flood hazards GIS map indicates that the low-lying portion of the site have an Annual Exceedance Probability modelled at 1%. A portion of the site is located within the Flood Hazard (Ponding) Area of the District Plan. Land contouring undertaken during construction of the development will ensure all surface water drains to the new road and reserve corridors in the proposed development. Building platforms will be set at levels that will comply with the NZ Building Code and will be calculated at building consent stage. Secondary flow paths will be provided along these road and reserve corridors to ensure all flow over and above the 1 in 50-year event (including 1 in 100 year events) is directed down contour and away from residential lots.

Flood modelling was undertaken as part of the plan change process to confirm that hydraulic neutrality, together with flood mitigation (i.e. hydraulic positivity) could be achieved. The Project also includes the creation of a permanent stormwater detention basin and constructed wetland to accommodate flood volumes within the Site to assist in alleviating flooding on adjacent properties and SH59.

Climate change will also be taken into account in the sizing of the design and sizing of sediment control devices including the DEBs and SRPs and the associated catchments of these devices.

Also with respect to climate change, if realised, the Project will assist in facilitating a reduction in greenhouse gas emissions compared to what would otherwise result if that housing capacity was delivered further afield (including other properties within the Northern Growth Area). This is achieved by providing housing capacity including a range of house typologies that provide intensification in close proximity to community infrastructure and employment opportunities, and providing infrastructure which will encourage alternative, low-emissions forms of transport (i.e. access and utilisation of public transport).

Also, climate change effects such as an increase in extreme weather events (including storms) has been taken into account in the design of the development. The stormwater concept will be designed to the Wellington Water Regional standards, with the general design to a 10% AEP rainfall level including 20% increase for climate change. Also, freeboard levels will be set at levels that are compliant with the NZ Building Code.

Other public benefit:

The Project includes the creation of development lots to contain future commercial, retirement and education activities. The benefits associated with the facilitation of these activities is discussed in detail in the *Economic Assessment*.

Also, as detailed in the *Economic Assessment*, the proposed development is located in an attractive location, offering a wide range of amenities that support residential development. Most notably:

- The proposed development is within a 5-min drive of a supermarket, medical centre, sportsfields, church and various employment opportunities
- The proposed development is within a 10-minute drive of the Porirua city centre, giving the residents access to approximately 786 businesses offering a total of approximately 10,800 jobs
- The residents of the proposed development would have access to a wide range of educational facilities, with most schools in Porirua City being within a 10-15min drive.

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

Section 5(2)(c) of the RMA requires that the adverse effects on the environment be avoided, remedied or mitigated. The avoidance, remediation or mitigation of adverse effects does not however require that there be no residual effects of the environment. While there may be some adverse effects, measures have been included in the proposal to appropriately and sustainably manage the actual and potential environmental effects associated with the Project. The implementation of various mitigation measures that will be outlined in detail in the fast-track consent application and adopted in finalised management plans seeks to ensure that any potential adverse effects from construction activities on water resources and ecosystems are minimised. By way of example, a finalised ECMP will manage and control the potential discharge of stormwater and sediment to waterbodies and adjacent properties.

Overall, and based on the technical assessments that have been prepared to support this referral application, measures have been incorporated into the proposal to ensure there is no potential for the Project to have significant adverse environmental effects. In this respect, a number of potential significant adverse effects have already been avoided through the iterative and comprehensive masterplanning process. The final Stage One development has been developed and progressed over the course of five years. The resource consent application will proffer conditions to ensure the effects are appropriated addressed and mitigated. Specifically related to ecology effects, where potential effects have not been avoided, the effects mitigation hierarchy will be applied to determine offsets required to offset any residual 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 GWRC flood hazards GIS map indicates that the low-lying portion of the site have an Annual Exceedance Probability modelled at 1%. A portion of the site is located within the Flood Hazard (Ponding) Area of the District Plan. Land contouring undertaken during construction of the development will ensure all surface water drains to the new road and reserve corridors in the proposed development. Building platforms will be set at levels that will comply with the NZ Building Code and will be calculated at building consent stage. Secondary flow paths will be provided along these road and reserve corridors to ensure all flow over and above the 1 in 50-year event (including 1 in 100 year events) is directed down contour and away from residential lots.

Flood modelling was undertaken as part of the plan change process to confirm that hydraulic neutrality, together with flood mitigation (i.e. hydraulic positivity) could be achieved. The Project also includes the creation of a permanent stormwater detention basin and constructed wetland to accommodate flood volumes within the Site to assist in alleviating flooding on adjacent properties and SH59.

Climate change will also be taken into account in the sizing of the design and sizing of sediment control devices including the DEBs and SRPs and the associated catchments of these devices.

Also with respect to climate change, if realised, the Project will assist in facilitating a reduction in greenhouse gas emissions compared to what would otherwise result if that housing capacity was delivered further afield (including other properties within the Northern Growth Area). This is achieved by providing housing capacity including a range of house typologies that provide intensification in close proximity to community infrastructure and employment opportunities, and providing infrastructure which will encourage alternative, low-emissions forms of transport (i.e. access and utilisation of public transport).

Also, climate change effects such as an increase in extreme weather events (including storms) has been taken into account in the design of the development. The stormwater concept will be designed to the Wellington Water Regional standards, with the general design to a 10% AEP rainfall level including 20% increase for climate change. Also, freeboard levels will be set at levels that are compliant with the NZ Building Code.

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
No details	

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.

Stephane Blick (agent)	07/02/2023
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.