

OFFICER'S REPORT FOR:

Independent Hearing Commissioners:

**Trevor Robinson (Chair)
Miria Pomare
David McMahon
Mark St Clair
Julia Williams**

SUBJECT:

**Proposed Porirua District Plan: Northern
Growth Development Area**

PREPARED BY:

Rory Smeaton, Senior Policy Planner

REPORT DATED:

10 February 2023

DATE OF HEARING:

13 March 2023

Executive Summary

1. This report considers submissions received by Porirua City Council (the Council) in relation to the relevant objectives, policies, rules, definitions, appendices and maps of the Proposed Porirua District Plan (PDP) Variation 1 as they apply to DEV – NG – Northern Growth Development Area chapter. The report outlines recommendations in response to the issues that have emerged from these submissions.
2. There were a number of submissions and further submissions received on the Northern Growth Development Area (NGDA) through the submissions on proposed Variation 1 to the PDP. The submissions received were diverse and sought a range of outcomes. The following are considered to be the key issues in contention in the chapter:
 - Protection of sensitive environments within and in proximity to the NGDA;
 - Potential impacts on and demand for educational facilities;
 - Provisions for SNA buffer areas and ecological connections;
 - The need to be 'consistent with' or 'in accordance with' the Structure Plan;
 - Having regard to the provisions of Proposed Change 1 to the RPS;
 - Mapping of natural hazards within the NGDA; and
 - Ensuring the transport network is safe and appropriate provides for all users.
3. This report addresses each of these key issues, as well as any other issues raised by submissions.
4. I have recommended some changes to the PDP provisions to address matters raised in submissions. These are summarised below:
 - An addition to the introduction addressing the potential for other activities to be undertaken or located within the FMAs;
 - Amendments to DEV-NG-O2 in clause seven to include public transport and refer to minimising reliance on private vehicles;
 - Amendments to DEV-NG-P2 to include the safety of all transport users in clause 4 and amend the reference to 'pedestrian' to 'active transport';
 - Amendments to DEV-NG-P3 to include 'and adjacent to' in relation to ecological values in clause 2.d, and to include the safety of all transport modes in clause 2.f;
 - Amendments to DEV-NG-R3 to include the phrase 'or directly adjoining' in relation to requirements for SNA buffer areas; and
 - Amendments to the ecological connections shown on DEV-NG-Figure 1 Northern Growth Development Area Structure Plan.
5. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in section Appendix A of this report.

6. For the reasons set out in the Section 32AA evaluation and included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
- Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
 - Achieve the relevant objectives of the PDP, in respect to the proposed provisions.

Contents

Executive Summary.....	i
Contents.....	iii
Interpretation	v
1 Introduction	1
1.1 Purpose	1
1.2 Author	1
1.3 Supporting Evidence	2
1.4 Key Issues in Contention	2
1.5 Procedural Matters	3
2 Statutory Considerations	4
2.1 Resource Management Act 1991.....	4
2.2 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 4	
2.3 National Policy Statements Gazetted since PDP Notification.....	5
2.4 Proposed Change 1 to the RPS.....	6
2.5 Section 32AA.....	7
2.6 Trade Competition	7
3 Consideration of Submissions and Further Submissions	8
3.1 Overview	8
3.2 General Submissions.....	9
3.3 Submissions on non-RMA matters.....	17
3.4 Education facilities	18
3.5 Significant Natural Area Buffers and Ecological Connections.....	21
3.6 Infrastructure	23
3.7 Commercial zone	28
3.8 Residential Intensification Precinct.....	29
3.9 'Consistent' versus 'in accordance' with the Structure Plan	30
3.10 Planning Maps.....	31
3.11 Chapter Introduction	34
3.12 Objectives.....	36
3.13 Policies	39
3.14 Rules.....	45
3.15 Northern Growth Development Area Structure Plan	46
3.16 APP17 - Ecological Corridors and SNA Buffer Areas	49

3.17	Other Methods.....	50
3.18	Minor Errors.....	51
4	Conclusions	52

Appendices

Appendix A.	Recommended Amendments to DEV – NG – Northern Growth Development Area Chapter
Appendix B.	Recommended Responses to Submissions and Further Submissions
Appendix C.	RPS Proposed Change 1
Appendix D.	Report Author's Qualifications and Experience

List of Figures

Figure 1: Attachment to Submission 22 identifying additional land sought to be included within the NGDA.....	32
Figure 2: Wellington Water Limited flood modelling outputs for the NGDA	33
Figure 3: Excerpt of DEV-NG-Figure 1 Northern Growth Development Area Structure Plan.....	47
Figure 4: Ecological connection areas sought by Gray Street Pukerua Bay residents Group.....	47
Figure 5: Ecological connections near Gray Street shown with a width of 50m	48

List of Tables

Table 1: Abbreviations	v
Table 2: Abbreviations of Submitters' Names	v

List of Tables in Appendices

Table B 1: Recommended responses to submissions and further submissions on Variation 1 to the PDP

Interpretation

7. Parts A and B of the Officer's reports utilise a number of abbreviations for brevity as set out in Table 1 below:

Table 1: Abbreviations

Abbreviation	Means
the Act / the RMA	Resource Management Act 1991
the Council	Porirua City Council
GWRC	Greater Wellington Regional Council
MDRS	Medium Density Residential Standards
NES	National Environmental Standard
NES-AQ	National Environmental Standards for Air Quality 2004
NES-CS	National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
NES-ETA	National Environmental Standards for Electricity Transmission Activities 2009
NES-FW	National Environmental Standards for Freshwater 2020
NES-MA	National Environmental Standards for Marine Aquaculture 2020
NES-PF	National Environmental Standards for Plantation Forestry 2017
NES-SDW	National Environmental Standards for Sources of Drinking Water 2007
NES-TF	National Environmental Standards for Telecommunication Facilities 2016
NGDA	Northern Growth Development Area
NPS	National Policy Statement
NPS-ET	National Policy Statement on Electricity Transmission 2008
NPS-FM	National Policy Statement for Freshwater Management 2020
NPS-HPL	National Policy Statement for Highly Productive Land
NPS-UD	National Policy Statement on Urban Development 2020
NPS-REG	National Policy Statement for Renewable Electricity Generation 2011
NZCPS	New Zealand Coastal Policy Statement 2010
the Operative Plan/ODP	Operative Porirua District Plan 1999
PC19	Proposed Plan Change 19 to the Operative Porirua District Plan 1999
the Proposed Plan/PDP	Proposed Porirua District Plan 2020
PNRP	Proposed Wellington Natural Resources Plan (Decisions Version) 2019
RPS	Wellington Regional Policy Statement 2013
Variation 1	Variation 1 to the Proposed Porirua District Plan 2020

Table 2: Abbreviations of Submitters' Names

Abbreviation	Means
Dept of Corrections	Ara Poutama Aotearoa the Department of Corrections
DOC	Department of Conservation Te Papa Atawhai
FENZ	Fire and Emergency New Zealand
Foodstuffs	Foodstuffs North Island Limited
Forest and Bird	Royal Forest and Bird Protection Society
GWRC	Greater Wellington Regional Council
Harvey Norman	Harvey Norman Properties (N.Z.) Limited

Heritage NZ	Heritage New Zealand Pouhere Taonga
House Movers Association	House Movers section of the New Zealand Heavy Haulage Association Inc
KiwiRail	KiwiRail Holdings Limited
MoE	Ministry of Education
NZDF	New Zealand Defence Force
Oil companies	Z Energy, BP Oil NZ Ltd and Mobil Oil NZ Limited
Oranga Tamariki	Oranga Tamariki – Ministry of Children
PBRA	Pukerua Bay Residents Association
PRA	Plimmerton Residents' Association
QEII	Queen Elizabeth the Second National Trust
RNZ	Radio New Zealand
Survey+Spatial	Survey+Spatial New Zealand (Wellington Branch)
Telco	Spark New Zealand Trading Limited, Chorus New Zealand Limited, Vodafone New Zealand Limited
Transpower	Transpower New Zealand Ltd
TROTR	Te Rūnanga o Toa Rangatira
Waka Kotahi	Waka Kotahi NZ Transport Agency
WE	Wellington Electricity Lines Limited
Woolworths	Woolworths New Zealand Limited

In addition, references to submissions includes further submissions, unless otherwise stated.

1 Introduction

1.1 Purpose

8. The purpose of this report is to provide the Hearing Panel with a summary and analysis of the submissions received on the DEV – NG – Northern Growth Development Area chapter and to recommend possible amendments to the PDP in response to those submissions.
9. This report is prepared under section 42A of the RMA. It considers submissions received by the Council in relation to the relevant strategic objectives, objectives, policies, rules, definitions, appendices and maps as they apply to the DEV – NG – Northern Growth Development Area chapter in the PDP. The report outlines recommendations in response to the key issues that have emerged from these submissions.
10. This report discusses general issues, the original and further submissions received following notification of the PDP and Variation 1, makes recommendations as to whether or not those submissions should be accepted or rejected, and concludes with a recommendation for changes to the PDP provisions or maps based on the preceding discussion in the report.
11. The recommendations are informed by the evaluation undertaken by the author. In preparing this report the author has had regard to recommendations made in other related s42A reports, particularly the Section 42A Report Part A – Overarching Report.
12. This report is provided to assist the Hearings Panel in their role as Independent Commissioners. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report and may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.
13. This report is intended to be read in conjunction with Section 42A Report Part A – Overarching Report which contains factual background information, statutory context and administrative matters pertaining to the district plan review and the PDP.

1.2 Author

14. My name is Rory McLaren Smeaton. My qualifications and experience are set out in Appendix D of this report.
15. My role in preparing this report is that of an expert planner.
16. I was involved in the preparation of the PDP and authored the Section 32 Evaluation Reports for the INF-Infrastructure, AR-Amateur Radio, REG-Renewable Electricity Generation, and SIGN-Signs chapters. I also authored the Section 32 Evaluation Report for the Noise and Light topic, and assisted in the preparation of the Section 32 Evaluation Report for the TR-Transport chapter. I authored the section 42A reports and presented in previous PDP hearing streams for a number of topics. In relation to Variation 1, I prepared the chapter provisions and authored the evaluation report for the DEV – NG – Northern Growth Development Area chapter, as well as preparing the amendments to the HOSZ – Hospital Zone, INF – Infrastructure, and SUB – Subdivision chapters.

17. The scope of my evidence relates to the DEV – NG – Northern Growth Development Area chapter. I confirm that the issues addressed in this statement of evidence are within my area of expertise as an expert policy planner.
18. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court in December 2023. I have complied with that Code when preparing written statements of evidence and I agree to comply with it when I give any oral evidence.
19. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.
20. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Supporting Evidence

21. The expert evidence, literature, legal cases or other material which I have used or relied upon in support of the opinions expressed in this report includes the following:
 - Section 32 Evaluation Report: Part B – Northern Growth Development Area and associated supporting reports; and
 - Statement of Evidence of Alistair Osborne on behalf of Porirua City Council (Flood Hazard Modelling).

1.4 Key Issues in Contention

22. A number of submissions and further submissions were received on the provisions of or relating to the DEV – NG – Northern Growth Development Area chapter. The submissions received were diverse and sought a range of outcomes; including for example seeking provisions for specific recreation and educational facilities, provisions to emphasise the safety of transport network, and the location of buffer areas around SNAs.
23. I consider the following to be the key issues in contention in the chapter:
 - Protection of sensitive environments within and in proximity to the NGDA;
 - Potential impacts on and demand for educational facilities;
 - Provisions for SNA buffer areas and ecological connections;
 - The need to be 'consistent with' or 'in accordance with' the Structure Plan;
 - Having regard to the provisions of Proposed Change 1 to the RPS;
 - Mapping of natural hazards within the NGDA; and
 - Ensuring the transport network is safe and provides for all users.
24. I address each of these key issues in this report, as well as any other issues raised by submissions.

1.5 Procedural Matters

25. At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions on the DEV – NG – Northern Growth Development Area chapter.

2 Statutory Considerations

2.1 Resource Management Act 1991

26. The PDP and Variation 1, and the associated Plan Change 19 to the ODP, have been prepared in accordance with the RMA and in particular, the requirements of:
 - Section 74 Matters to be considered by territorial authority; and
 - Section 75 Contents of district plans.
27. As set out in Section 32 Evaluation Report Part 1 - Overview to s32 Evaluation, there are a number of higher order planning documents and strategic plans that provide direction and guidance for the preparation and content of the PDP. These are discussed in detail in the Section 42A report Part A – Overarching, including the approach the Council has taken to giving effect to the NPS-UD.
28. The sections below provide a brief discussion on the relevant matters of the higher order planning documents relevant to the NGDA.

2.2 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

29. The RMA-EHS gained Royal assent on 20 December 2021. Tier 1 councils are required by the RMA-EHS to make changes to their operative and/or proposed district plans for the purposes of:
 - Incorporating Medium Density Residential Standards (MDRS) into all relevant residential zones (s77G(1));
 - Implementing the urban intensification requirements of Policy 3 of the National Policy Statement on Urban Development (NPS-UD) (s77G(2)) and give effect to policy 3 in non-residential zones (s77N); and
 - Including the objectives and policies in clause 6 to Schedule 3A of the RMA (s77G(5)).
30. The required plan changes and variations must be undertaken using Intensification Planning Instruments (IPIs) under sections 80E to 80H of the RMA. Councils must use the Intensification Streamlined Planning Process (ISPP) set out in Part 6 of Schedule 1 of the RMA. In accordance with the statutory timeframe in s80F of the RMA, Council was required to notify its IPI by 20 August 2022. The Council notified the IPI on 11 August 2022. The Minister for the Environment's Direction, gazetted on 27 April 2022, specifies that decisions on Council's IPI must be notified by 20 August 2023.
31. The primary focus of Variation 1 to the PDP is to achieve the above requirements of the RMA as amended by the RMA-EHS.

2.3 National Policy Statements Gazetted since PDP Notification

2.3.1 National Policy Statement on Freshwater Management

32. The NPS-FM 2020 came into force on 3 September 2020 and from that date replaced the NPS-FM 2017. The NPS-FM is addressed in the Section 32 Evaluation Report Part 1 - Overview to 32 Evaluation (2020). Additionally, a provision-by-provision analysis of PDP provisions against the Whaitua Implementation Plan and the Ngāti Toa Statement was provided in the Council's reply on Hearing Stream 1.
33. The NPS-FM 2020 is discussed in detail in relation to the approach to Variation 1 and Plan Change 19 in the Section 42A report Part A – Overview.

2.3.2 National Policy Statement on Urban Development

34. The NPS-UD was gazetted on 23 July 2020 and came into effect on 20 August 2020. It replaced the National Policy Statement on Urban Development Capacity 2016 (the NPS-UDC). The NPS-UD objectives and intensification policies in the RMA introduced by the RMA-EHS aim to ensure that local authorities through their planning activities, including the district plan:
 - Achieve a well-functioning urban environment;
 - Recognise and provide for change in the built environment, as demand for housing in terms of numbers, types of housing and location for housing change over time;
 - Align urban development with infrastructure supply;
 - Enable increased building heights or densities in defined locations including within:
 - A walkable catchment of a Metropolitan Centre Zone;
 - A walkable catchments of a rapid transit stop; and
 - Areas of high demand and/or an area well-served by existing or planned active and public transport.
35. The City's urban zones represent key locations to achieve the above intensification and well-functioning urban environment outcomes. Variation 1 to the PDP and Plan Change 19 to the ODP have been promulgated to give effect to the NPS-UD, particularly the requirements to achieve greater intensification within urban environments.
36. A later variation or plan change will be required to insert the housing bottom line as set out in clause 3.36(4) of the NPS-UD. The relevant housing bottom lines were directly inserted into the Regional Policy Statement for the Wellington Region (2013) as Objective 22A and Table 9A under section 55(2) of the RMA.

2.3.3 National Policy Statement on Highly Productive Land

37. The NPS-HPL was approved on 12 September 2022. It seeks to ensure highly productive land is protected for use in land-based primary production.
38. The NPS-HPL sets out a process that requires regional councils to map highly productive land in its region. The criteria for this land include that the land is in a general rural zone or rural production zone, is predominantly LUC 1, 2, or 3 land, and forms a large and geographically

cohesive area. After these maps are included in the RPS, the territorial authorities must identify within its district plan the mapped highly productive land in its district.

39. The NPS-HPL sets out requirements for territorial authorities to include objectives and policies in district plans for:
- Restricting urban rezoning of highly productive land;
 - Avoiding rezoning of highly productive land for rural lifestyle;
 - Avoiding subdivision of highly productive land;
 - Protecting highly productive land from inappropriate use and development;
 - Exemption for highly productive land subject to permanent or long-term constraints;
 - Continuation of existing activities;
 - Supporting appropriate productive use of highly productive land; and
 - Managing reverse sensitivity and cumulative effects;
40. The approach to the NPS-HPL 2022 is discussed in the Section 42A report Part A – Overview.
41. Clause 3.5(7) sets out how the NPS-HPL is to be applied prior to highly productive land maps being included in the RPS. Importantly in relation to the NGDA, clause (b) states that the NPS-HPL is to be applied to land that:
- (b) is not:*
- (i) identified for future urban development; or*
- (ii) subject to a Council initiated, or an adopted, notified plan change to rezone it from general rural or rural production to urban or rural lifestyle.*
42. As the land within the NGDA is zoned FUZ or RLZ, the NPS-HPL does not apply.

2.4 Proposed Change 1 to the RPS

43. GWRC notified Proposed Change 1 to the RPS on 19 August 2022, after the notification of Variation 1 to the PDP and Plan Change 19 to the ODP. The focus of Proposed Change 1 is to implement and support the NPS-UD and to start the NPS-FM process. The proposed change also aims to address issues related to climate change, indigenous biodiversity and high natural character.
44. The Section 42A report Part A – Overview provides a detailed discussion on the implication of Proposed Change 1 to the RPS to Variation 1 to the PDP and Plan Change 19 to the ODP.
45. The objectives and policies as included or amended by Proposed Change 1 relevant to the NGDA are set out in Appendix C.
46. These provisions are discussed where relevant in relation to the amendments sought to Variation 1 of the PDP in section 3 below.

2.5 Section 32AA

47. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA . Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

48. The required section 32AA evaluation for changes proposed as a result of consideration of submissions with respect to the NGDA is contained within the assessment of the relief sought in submissions in section 3 of this report, as required by s32AA(1)(d)(ii).

2.6 Trade Competition

49. No consideration of trade competition has been given with respect to the DEV – NG Northern Growth Area chapter.
50. There are no known trade competition issues raised within the submissions.

3 Consideration of Submissions and Further Submissions

3.1 Overview

51. There were approximately 118 original submission points received on the DEV – NG – Northern Growth Area chapter. Additionally, 91 further submissions are addressed within the report. Common themes that have arisen from the submissions include a concern for potential effects on surrounding sensitive environments, protection of SNAs within the NGDA, potential impacts on and demand for education facilities, provision of adequate transport infrastructure and stormwater management, and the location and zoning of the commercial centre.

3.1.1 Report Structure

52. Submissions on the DEV – NG – Northern Growth Development Area chapter raised a number of issues which have been grouped into sub-topics within this report. Some of the submissions are addressed under a number of topic headings based on the topics contained in the submission. I have considered substantive commentary on primary submissions contained in further submissions as part of my consideration of the primary submission(s) to which they relate.
53. In accordance with Clause 10(3) of the First Schedule of the RMA, I have undertaken the following evaluation on both an issues and provisions-based approach, as opposed to a submission-by-submission approach. I have organised the evaluation in accordance with the layout of chapters of the PDP as notified.
54. Due to the number of submission points, this evaluation is generic only and may not contain specific recommendations on each submission point, but instead discusses the issues generally. This approach is consistent with Clause 10(2)(a) of Schedule 1 to the RMA. Specific recommendations on each submission / further submission point are contained in Appendix B.
55. The following evaluation should be read in conjunction with the summaries of submissions and the submissions themselves. Where I agree with the relief sought and the rationale for that relief, I have noted my agreement, and my recommendation is provided in the summary of submission table in Appendix B. Where I have undertaken further evaluation of the relief sought in a submission(s), the evaluation and recommendations are set out in the body of this report. I have provided a marked-up version of the Chapter with recommended amendments in response to submissions as Appendix A.
56. This report only addresses definitions that are specific to this topic. Definitions that relate to more than one topic have been addressed in Hearing Stream 1.

3.1.2 Format for Consideration of Submissions

57. For each identified topic, I have considered the submissions that are seeking changes to the PDP in the following format:
- Matters raised by submitters;
 - Assessment;
 - Summary of recommendations; and
 - Section 32AA evaluation.

58. The recommended amendments to the DEV – NG – Northern Growth Development Area chapter are set out in in Appendix A of this report where all text changes are shown in a consolidated manner.
59. I have undertaken a s32AA evaluation in respect to the recommended amendments in my assessment.
60. Note that there are further submissions that support submissions in their entirety:
- The further submission from Leigh Subritzky [FS17] supports original submissions OS 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 24, 25, 26, 29, 30, 31, 32, 33, 34, 35, 39, 40, 41, 42, 43, 44, 47, 48, 51, 52, 55, 58, 60, 61, 62, 63, 64, 65, 66, 68, 69, 70, 72, 73, 74, 77, 79, 80, 85, 86, 87, 88, 89, 90, 91, 97, 98, 99, 100, 102, 104, 105, 106, 107, 109, 110, 111, 114, 115, 116, and 117. Original submissions OS 2, 5, 19, 20, 21, 27, 28, 53, 54, 56, 67, 71, 75, 76, 78, 81, 82, 83, 84, 94, 95, 96, 101 and 113 were opposed by the further submitter.
 - The further submission from Alan Collett [FS64] opposes the submission from Kāinga Ora [OS76];
 - The further submission from Brian Warburton [FS99] opposes the submission from KM & MG Holdings Ltd [OS54];
 - The further submission from Ryman Healthcare Limited [FS67] opposes the submission from Retirement Village Association [OS118];
 - The further submission from Friends of Taupō Swamp and Catchment Inc [FS68] opposes the submission from KM & MG Holdings Ltd [OS54]; and
 - The further submission from Rebecca Davis [FS127] supports the submissions OS 11, 32, 58, 68, 79, 82, 111 and 114 and opposes submissions OS 59 and 76.
61. In these cases, recommendations in relation to these further submissions reflect the recommendations on the relevant primary submission.

3.2 General Submissions

3.2.1 Broad General Submissions

3.2.1.1 Matters raised by submitters

62. Paul Clegg [OS11.5] seeks that natural vegetation and waterways including constructed wetlands or other FMAs should make up 50 percent of the development area. The stated reason is that it is essential to protect and restore the natural environment to support future generations and develop communities that are as resilient to climate change as possible.
63. Alan Collett [OS99.2, OS99.10 and OS99.11] does not seek specific amendments, but raises concerns relating to:
- Investigations to model intensification of existing urban areas and including zoning changes to allow medium density housing;

- Concerns regarding the process for the structure plan and that it appears that the proposed variation is a 'fait accompli' and that no submissions from the existing residents will matter; and
 - Concerns regarding potential conflicts of interest.
64. TROTR [OS114.53] seeks that further research and work to be done, as the submitter cannot be sure how the effects on ecological systems can be balanced against the construction and the works.

3.2.1.2 Assessment

65. The submission from Paul Clegg [OS11.5] notes the results of a study¹ reported by the BBC² which concluded that that 50 percent of Auckland's surface was green or blue, even after excluding its harbours. The aim of the ARUP study was to 'highlight the importance of understanding a city's natural ability to manage heavy rainfall, as a critical first step to enhancing this ability'. I note that the methodology used by ARUP included private greenspace within the calculations.
66. The PDP already includes regulatory responses to issues relating to stormwater management. These responses include the provisions in the THWT – Three Waters chapter, which requires new development to achieve hydraulic neutrality. In the MRZ – Medium Density Residential Zone this is through the requirements for the installation of retention tanks to capture and slowly release stormwater discharged from building roofs.
67. MRZ-S6 requires 20 percent of a site to be landscaped. Additionally, the FMA and SNAs within the MRZ – Medium Density Residential Zone of the NGDA cover a total of approximately 29 hectares, or around 15.6 percent of the residential area. The introduction to the DEV - NG - Northern Growth Development Area chapter states that the identified FMAs:

...can also provide for water sensitive design approaches to stormwater management including catchment scale detention devices; provide increased resilience to flood hazards; connect the community to water and provide for passive recreation, and; create high quality amenity for the community.

68. Added to these areas will be the parks and ecological connections identified on the Structure Plan, as well as any SNA buffer areas created through subdivision activities and road berm areas within any road corridors.
69. As such, the PDP provisions already address stormwater management issues, and the NGDA Structure Plan identifies large areas of 'green' and 'blue' spaces. Therefore, I do not consider there to be a need to require that 50 percent of the development area be natural vegetation and waterways.
70. In relation to the matters raised by Alan Collett [OS99.2, OS99.10 and OS99.11], these were largely addressed in Appendix B the Section 32 Evaluation Report Part B: Northern Growth

¹ ARUP, 2022, Arup Global Sponge Cities Snapshot. Available from:

<https://www.arup.com/perspectives/publications/research/section/global-sponge-cities-snapshot>

² BBC, 2022, Cities need to become more 'spongy'. Auckland is leading the way. Available from:

<https://www.bbc.com/future/article/20220823-how-auckland-worlds-most-spongy-city-tackles-floods>

Development Area. I agree with the responses provided in that report and do not consider that these matters require any further comment.

71. In relation to the submission from TROTR [OS114.53], the ecological assessment undertaken by Boffa Miskell Limited is comprehensive and robust. I note that the report states that, in the view of the authors, the existing provisions of the PDP can adequately manage activities within the existing and proposed SNAs. While a range of broader potential effects are identified in section 4.1 of the report, opportunities are also identified, and recommendations are made to appropriately manage and protect ecological values of the site, beyond the provisions already contained in the PDP, NRP and NES-F. As such, I do not consider that further research is required in relation to ecological effects of the proposed development area.

3.2.1.3 Summary of recommendations

72. I recommend for the reasons given in the assessment, that the submissions from Paul Clegg [OS11.5], Alan Collett [OS99.2, OS99.10 and OS99.11] and TROTR [OS114.53], be **rejected**.
73. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.2 Environmental Protection

3.2.2.1 Matters raised by submitters

74. The PRA [OS79.13] seeks that environmental protection for the Taupō Swamp and catchment similar to that provided for Plimmerton Farm Zone under PC18 be applied to the NGDA due to concerns for the capacity of existing infrastructure to support the scale of this development.
75. QEII [OS82.1] seeks adequate protections to be in place to ensure that increased housing supply and intensification in the district is undertaken within the ecological capacity of the area, and that the open space values and natural environment are safeguarded for future generations. The reasons given relate to the QEII covenants and properties within the immediate area, and the impacts that the proposed NGDA will have on the protected values at these sites
76. Yvonne Fletcher [OS108.2] seeks that run-off and potential silting from the NGDA are strictly managed to avoid damage and risks to existing communities and environments at Plimmerton/Hongoeka, Pukerua Bay and Pāuatahanui Inlet, for the reason that there is no need to exacerbate any damage already done.
77. Alan Collett [OS99.8] does not seek any specific amendments but suggests that resource consent requirements are placed on the developer to mitigate the destruction of such a large forestry block.
78. TROTR [OS114.51] does not seek any specific amendments but suggests that concerns relating to the potential impacts on Taiao (in particular from earthworks) should be looked at a larger scale not at the project level.

3.2.2.2 Assessment

79. In relation to the submission from QEII [OS82.1] the NGDA has been subject to a comprehensive Ecological Assessment, with the recommendations from that report being incorporated into the

DEV – NG – Northern Growth Area chapter provisions. These include the new SNAs identified on the site and the requirements for the SNA buffer areas and ecological connections. Recommendations in response to other submission points include providing additional buffer areas around SNAs on adjacent land (see section 3.5 below).

80. In relation to the submissions from the PRA [OS79.13] and Yvonne Fletcher [OS108.2] the district-wide requirements of the PDP will apply to activities undertaken within the NGDA. Specifically, this includes the EW – Earthworks chapter, which include standards for retaining silt and sediment on site during earthworks activities. The provisions of the NRP will also apply, which includes provisions relating to earthworks and associated discharges to freshwater. Additionally, operational stormwater is addressed by the Stormwater Management Site Assessment, which includes a draft Stormwater Management Plan. As such, while recognising the desire for the protection of sensitive environments sought by the submitters, I consider that no additional requirements are necessary in response to these submission points.
81. In relation to the submission from Alan Collett [OS99.8] as noted above, the NGDA has been subject to a comprehensive Ecological Assessment. Additionally, harvesting of plantation forestry is regulated under the Resource Management (National Environmental Standards for Plantation Forestry) Regulations 2017.
82. The concerns from TROTR [OS114.51] have been addressed through the comprehensive assessments undertaken by technical experts, including in relation to ecology and operational stormwater as noted above. These assessments took a site-wide approach, and their recommendations have been incorporated into the DEV – NG – Northern Growth Area chapter provisions.

3.2.2.3 Summary of recommendations

83. I recommend for the reasons given in the assessment, that the submissions from the PRA [OS79.13], QEII [OS82.1] and Yvonne Fletcher [OS108.2] be **accepted in part**.
84. I recommend for the reasons given in the assessment, that the submissions from Alan Collett [OS99.8] and TROTR [OS114.51], be **rejected**.
85. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.3 Climate Change and Natural Hazards

3.2.3.1 Matters raised by submitters

86. The PBRA [OS47.6] seeks that PCC prioritise modelling of natural hazards across the whole site and the identification of adaptation required to changing risks from climate change impacts before development of the site. The reasons stated include that this needs to be done before resource consents are issued for development on the site given the increased risk from climate change impacts.
87. GWRC [OS74.32] seeks policies and rules for any greenfield development areas that require the development to include actions and initiatives that improve climate resilience, for the reason that there is a role for Variation 1 to include additional provisions to have regard to Proposed RPS Change 1 direction in providing for urban intensification and development.

88. Alan Collett [OS99.7] does not seek any specific relief, but questions whether the irony is not lost on PCC that a forest planted for carbon sequestration is to be uprooted to make way for this development, and notes that Objective 8 of the NPS-UD relates to supporting reductions in greenhouse gas emissions and the future effects of climate change.
89. Yvonne Fletcher [OS108.1] seeks that recent extreme rain event are considered against present knowledge of NGDA hydrology, and questions whether any hydrological factors have changed which may affect density planning and whether the NGDA is still suitable for the proposed extent of development.

3.2.3.2 Assessment

90. The submission point from PBRA [OS47.6] is linked to the submission from the GWRC [OS74.73] addressed in section 3.10.2 below which sought the planning maps be amended to include ponding zones and overland flow paths in flood hazard overlays in the Northern Growth Area. As addressed below, modelling of the Flood Hazard within the NGDA has been sought from Wellington Water Limited, which has been provided through the statement of evidence from Alistair Osborne of Wellington Water (Flood Hazard Modelling). This modelling includes consideration of the likely impacts of climate change on flood hazard risk. In relation to the other natural hazard overlays in the PDP, the Coastal Hazard and Tsunami Hazard overlays are not relevant as the NGDA is not within the coastal environment, and the Fault Rupture Zone overlay has already been identified across the district and is outside of the NGDA.
91. The submission point from GWRC [OS74.32] states that the relevant climate resilience policies in Proposed Change 1 are Policy CC.4 and Policy CC.14. This submission point is linked to the submission point addressed in section 3.2.5 below and the wider submission from GWRC on Proposed Change 1 addressed in the Section 42A Report Part A – Overarching Report. As noted in section 3.2.5 below, there are a number of potential issues in recommending potentially significant changes to the PDP Variation 1 on the basis of the provision in Proposed Change 1 to the RPS. In any case, the matters in Policy CC.4 and Policy CC.14 are considered in Appendix C, which finds that appropriate regard has been given to the matters in those policies through the development of the NGDA provisions. However, I note that the matters in Policy CC.14 clauses (e) and (f) are Building Act 2004 matters and are not addressed by the PDP. As such, I do not consider that any amendments to the DEV – NG Northern Growth Development Area chapter are required in response to submission point [OS74.32] from GWRC.
92. In relation to the submission from Alan Collett [OS99.7], any requirements of the Climate Change Response Act 2002 relating to any forests on the site are the responsibility of the landowner.
93. In relation to the submission from Yvonne Fletcher [OS108.1], the technical assessment that support the NGDA included a Stormwater Management Site Assessment. This included consideration of the impacts of urban development on the downstream receiving environments. Additionally, the district-wide THWT – Three Waters chapter will apply to the NGDA, which requires hydraulic neutrality for all new developments.

3.2.3.3 Summary of recommendations

94. I recommend for the reasons given in the assessment, that the submissions from the PRA [OS79.6], GWRC [OS74.32] and Yvonne Fletcher [OS108.1] be **accepted in part**.
95. I recommend for the reasons given in the assessment, that the submissions from Alan Collett [OS99.7], be **rejected**.

3.2.4 NPS-UD

3.2.4.1 Matters raised by submitters

96. Alan Collett [OS99.1, OS99.3, OS99.4 and OS99.9] does not seek any specific relief but raises a number of concerns and questions in relation to the NPS-UD and NGDA. These concerns and questions include:

- Questions around the demand for the housing;
- Questions around the how the NGDA will achieve improvements in housing affordability;
- The ability provided by policy 4 of the NPS-UD to modify density requirements under policy 3;
- Exacerbation of urban sprawl; and
- True cost of housing is in construction costs.

3.2.4.2 Assessment

97. In relation to the demand for housing, growth forecasts and housing affordability in Porirua is discussed in section 5.1 of the Section 32 Evaluation Report Part A – Overview to s32 Evaluation. This includes discussion of the most recent Wellington Region Housing and Business Development Capacity Assessment, Housing Update undertaken in May 2022, and states that “[i]ndicators show continuing unaffordability of housing in Porirua, together with a rapid acceleration in house prices”.

98. Objective 2 of the NPS-UD states ‘[p]lanning decisions improve housing affordability by supporting competitive land and development markets’. The NGDA will support a competitive land and development market within Porirua by enabling additional greenfield development capacity.

99. Variation 1 proposes that all of the residential areas within Porirua are zoned as either MRZ or HRZ. The zoning of the residential areas within the NGDA is the MRZ. The Section 32 Evaluation Report Part A sets out the approach to qualifying matters taken through Variation 1 in section 2.7 of that report. This includes listing the qualifying matters in the notified PDP (2020) that amend MDRS and building height and density requirements under Policy 3 of the NPS-UD. The only new qualifying matters proposed through Variation 1 relate to:

- Sites adjacent to heritage sites and associated settings, and Sites and Areas of Significance to Māori;
- Setbacks from the railway corridor; and
- Managing adverse shading effects.

100. The NGDA does not contain any heritage sites or associated settings or Sites and Areas of Significance to Māori, nor is it located adjacent to the NIMT. Shading effects were assessed on a site-by-site basis as required under the NPS-UD, and therefore are not relevant to the large allotments within the NGDA.

101. In relation to the exacerbation of urban sprawl, the Northern Growth Area was identified in the Porirua Growth Strategy 2048 Spatial Framework as a ‘New Residential Area – Medium term’,

and the majority of the land proposed to be zoned for urban uses within the NGDA was identified as FUZ in the PDP. It is therefore consistent with the long-term growth planning for Porirua.

102. While construction costs are an important factor in the overall cost of new dwellings, the cost of land is potentially more significant. The cost-benefit analysis of the proposed MDRS undertaken for the Ministry for the Environment dated June 2021 stated that, "within New Zealand's cities the price of land remains the largest cost to new homes."³

3.2.4.3 Summary of recommendations

103. I recommend for the reasons given in the assessment, that the submissions from Alan Collett [OS99.1, OS99.3, OS99.4 and OS99.9], be **rejected**.
104. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.5 RPS Plan Change 1

3.2.5.1 Matters raised by submitters

105. GWRC [OS74.59] seek that:

Ensure the Development Area provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics, having regard to Proposed RPS Change 1 policies 55 and UD.3 as required. This includes ensuring that potential adverse effects of greenfield development are mitigated appropriately, occur within contaminant limits set by Greater Wellington as required by the NPS-FM, and can comply with conditions on relevant discharge consents held by Wellington Water

106. The reasons include achieving urban areas that are climate resilient, contribute to the protection of the natural environment and transition to a low-emission region, are compact and well connected, support housing affordability and choice, and enable Māori to express their cultural and traditional norms. The reasons also state that, in relation to scope, policy direction that relates to district-wide matters and greenfield development could be included in an IPI under section 80E.

3.2.5.2 Assessment

107. Proposed Change 1 notes that Objective 22 has been redrafted to give effect to the concept of a well-functioning urban environment as articulated by the NPS-UD .
108. The submitter has not provided any specific amendments in relation to the NGDA as to how regard may appropriately be given to Objective 22 as redrafted by Proposed Change 1. This creates a number of issues for any relief that may be considered to be required in relation to the scope of the submission. If the relief were to result in significant amendments that were not able

³ PwC and Sense Partners, 2021, Cost-Benefit Analysis of proposed Medium Density Residential Standards, pg 10. Available from: <https://environment.govt.nz/assets/publications/Cost-benefit-analysis-of-proposed-MDRS-Jan-22.pdf>

to be reasonably foreseen by other submitters or members of the public, this may result in issues of natural justice. There may also be a question of whether the submission is valid due to the lack of specificity. I would therefore suggest that it may be appropriate for the Panel to seek clarification from the submitter on the specific relief sought.

109. Additionally, given that Proposed Change 1 was notified after Variation 1 to the PDP and is still at an early stage of the process, it may be more efficient and effective to give effect to the final updated RPS once hearings are completed and decisions are made.
110. In any case, I have considered the current policy direction set out in Objective 22 and Policies 55 and UD.3 as included in Proposed Change 1. I have included comments on these provisions in Appendix C. Overall, I consider that the provisions of the PDP and Variation 1 as a whole sufficiently address the matters in the objective and policies in relation to the NGDA. As such, having had regard to those provisions, I do not recommend any amendments to the DEV – NG Northern Growth Development Area chapter.

3.2.5.3 Summary of recommendations

111. I recommend for the reasons given in the assessment, that the submissions from GWRC [OS74.59], be **rejected**.
112. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.6 Cultural Landscape Values

3.2.6.1 Matters raised by submitters

113. TROTR [OS114.52] seeks that landscape values be assessed as they also connect to Cultural Landscape Values. The reasons include that the NGDA is a large part of integrated Cultural Landscapes from Te Ara Taua and Pukerua Bay and Taupō Pā.

3.2.6.2 Assessment

114. The PDP included two landscape overlays identified on the planning maps as well as associated provisions in the relevant chapters, in accordance with the requirements of the RPS. These overlays are the Outstanding Natural Features and Landscapes (ONFL) and Special Amenity Landscapes (SAL).
115. The identification of ONFL and SAL for the PDP was undertaken by technical experts in accordance with the relevant RPS policies, being Policy 25 and Policy 27. These policies include Tangata Whenua values as a factor of the landscape values to be considered in identifying ONFL and SAL. The Porirua Landscape Evaluation (Isthmus, 2020) included a section entitled 'Tangata Whenua landscape values for Porirua: Overview'. The report notes that:

Development of the statement involved consultation with Ngāti Toa Rangatira mana whenua; review of documents provided by Ngāti Toa and Porirua City Council; and further desk-top research.

116. Natural Features and Landscapes was a topic covered in Hearing Stream 4. A total of 212 original submissions and 42 further submissions were received on the topic. No submissions were received seeking identification of 'cultural landscapes'.

117. The submitter has not provided any maps of the 'integrated Cultural Landscapes' referred to in the reasons for the submission, nor articulated the cultural landscape values associated with the landscape or how these may be affected by the proposed NGDA. The submitter may wish to address this matter at the hearing.
118. As the appropriate period for addressing any cultural values associated with natural features landscapes was during Hearing Stream 4, and due to a lack of available information regarding any potential cultural landscape values associated with the NGDA provided with the submission, I am unable to agree with the submitter. As such, I do not recommend any amendments in response to the submission.

3.2.6.3 *Summary of recommendations*

119. I recommend for the reasons given in the assessment, that the submissions from TROTR [OS114.52], be **rejected**.
120. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.3 Submissions on non-RMA matters

3.3.1 *Matters raised by submitters*

121. Judith Frost-Evans and Gay Hay [OS55.1, OS55.2 and OS55.5] sought that new guidelines are created in relation to:
- Predator Free status of the NGDA;
 - Dog, traffic and pest control; and
 - The management of weeds that inevitably follow land development.
122. The reasons stated by the submitter include that there are no provisions for protecting biodiversity or the ecological values of Pukerua Beach, or designing the urban environment for a carless future.

3.3.2 *Assessment*

123. Regional councils are required to prepare and operate Regional Pest Management Plans under the Biosecurity Act 1993. The Greater Wellington Regional Pest Management Plan 2019–2039 commenced on 2 July 2019.
124. Dogs are managed by the Council under the Porirua City Council Dog Control Bylaw 2021, made under section 145 of the Local Government Act 2002 and section 20 of the Dog Control Act 1996.
125. Traffic, including parking, is managed under the Porirua City Council Transport Bylaw 2021 made in accordance with section 22AB of the Land Transport Act 1998.
126. The matters raised are therefore appropriately managed outside of the RMA framework, and no amendments are required to the PDP to address these matters.

3.3.3 Summary of recommendations

127. I recommend for the reasons given in the assessment, that the submissions from Judith Frost-Evans and Gay Hay [OS55.1, OS55.2 and OS55.5] be **rejected**.
128. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.4 Education facilities

3.4.1 Matters raised by submitters

129. The MoE [OS92.1, OS92.2, OS92.3 and OS92.4] seeks specific amendments to the provisions, being:
- Amendment to DEV-NG-O2-3 to include 'and is connected to educational facilities.';
 - Inclusion of a new DEV-NG-O2-9 being, '[a]n urban environment which is supported by educational facilities to meet the needs of the local community.';
 - Amendments to DEV-NG-P2-4.c and DEV-NG-P3-1.f to include 'including to existing or planned educational facilities';
 - Inclusion of a new DEV-NG-P3-1.h being, '[t]here is a need to provide educational facilities which support the local community.'; and
 - Amendment to DEV-NG-P4-3 to include 'including not providing for educational facilities'.
130. The reasons provided include that Variation 1 will contribute to providing additional housing within Porirua, and that this will require additional capacity in the local school network to cater for this growth as the area develops and potentially drive the need for a new school in the community. Subpart 3.5 of the NPS-UD states that local authorities must be satisfied the additional infrastructure to service the development capacity is likely to be available.
131. Pukerua Bay School Board of Trustees [OS111.1, OS111.2, OS111.3 and OS111.6] seeks that:
- Either one or both of:
 - Pre-planning with the MoE to either bolster the infrastructure of Pukerua Bay School to ensure the buildings and space can handle the increasing numbers of children into the area, while still maintaining the open field environment for the benefit of the children and teachers at the school, and community;
 - Confirmation from MoE of a new school in the area and robust plans and timeframes for this to occur; and
 - Land be allocated to building a community hall which caters for a range of indoor sports and an open field area that can cater for football and rugby, and a plan to build a 25 metre covered swimming pool.
132. The reasons include that there is no visible consideration of Pukerua Bay School and the impact the development or variation will have on the school.

3.4.2 Assessment

133. The responsibility for the future planning for schools sits with the MoE. Information provided on the MoE website includes Education Network Plans. The Porirua North Education Network Plan⁴ identifies the Porirua North catchment, which includes the NGDA, as 'steady growing' and in relation to school property investment states that:

We will continue to invest in providing additional classrooms to schools where necessary to accommodate growing school rolls.

134. Additionally, I note that the MoE information on the general process for building a school involves first acquiring the land, and then a subsequent designation process.⁵ This is reflected in the PDP where all existing schools are designated, including Pukerua Bay School.
135. In relation to the submissions from the MoE [OS92.1, OS92.2, OS92.3 and OS92.4], I note that subclause DEV-NG-O2-1 seeks that:

Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:

1. A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan;

136. The definition of a 'well-functioning urban environment' under the NPS-UD, and which is proposed to be included in the PDP through Variation 1, includes good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport. Community services are defined in the NPS-UD as including educational facilities. As such, by extension, a well-functioning urban environment within the NGDA, as sought by DEV-NG-O2-1, would include good accessibility for all people to educational facilities.
137. However, I consider that, generally, the specific amendments to the provisions sought by the MoE are not appropriate. When read in the context of the proposed objectives and policies, the amendments sought would either result in overly specific and unnecessary reference to education facilities, or the outcomes sought would not be able to be achieved until such time as any education facilities are planned or established by the MoE itself.
138. An example of the first overly-specific nature of the requested amendments is the change requested to DEV-NG-P3-1.f. The requested amendment would add reference to existing and planned educational facilities to a clause that otherwise addresses the need for a connected transport network without listing every land use that relies on such networks. I consider that such additional wording is unnecessary as the existing clause already captures the critical matters. On the rationale for these amendments the submission from the MoE notes that:

The Ministry therefore has an interest in ... Ensuring that provisions in the proposed changes to the District Plan specifically acknowledge and provide for schools. This is critical given schools are an essential piece of social and community infrastructure. An

⁴ <https://assets.education.govt.nz/public/ENP/Wlg-PoriruaNorth.pdf>

⁵

<https://assets.education.govt.nz/public/Documents/Ministry/Budgets/Budget2019/NEGP/BuildingaSchool.pdf>

absence of supportive provisions can place obstacles in the way of the establishment of education facilities in future years;

139. While I agree that schools are an essential piece of social and community infrastructure, as noted above, the MoE uses designation processes to provide for schools within the district plan. I note that the proposed MRZ provisions include MRZ-R11 which controls educational facilities, under which the matters of discretion for restricted discretionary resource consents are set out in RESZ-P11. Proposed schools within the NGDA would therefore be assessed against RESZ-P11 along with DEV-NG-P3. I do not consider that the proposed provisions would inappropriately constrain the identification of a future school site through the designation process.
140. Examples of the latter situation where the amendment would create issues until such time that the MoE decided on the location and timing for establishment of education facilities, include the changes requested to DEV-NG-P3-1 and the new clause requested for DEV-NG-O2. Until the potential need for and subsequent identification of new educational facilities within the NGDA by the MoE occurs, applicants for subdivision consent would not be able to demonstrate whether education facilities were appropriately provided for or not. This would therefore place an unacceptable cost on those applicants.
141. In relation to Subpart 3.5 of the NPS-UD, the NGDA provides approximately 185.8 hectares of land proposed to be zoned as MRZ, and which may be suitable for educational facilities. As identified below, development of the area is anticipated to occur in multiple stages over a period of 15 – 20 years. Given the existing school in Pukerua Bay, the significant expected time period for development, and the process available to the MoE for designating any sites required for new schools, I consider that sufficient education infrastructure is likely to be available.
142. The outcome sought by the submission from Pukerua Bay School Board of Trustees [OS111.1] can only be achieved by the MoE. The planning for education facilities is not directed under the district plan.
143. In relation to the submission from Pukerua Bay School Board of Trustees relating to seeking land be identified for a community hall, sports field and a plan for a swimming pool [OS111.2 and OS111.3], the structure plan identifies the location of a neighbourhood community park adjacent to the NCZ. While this park would likely be suitable for the sports fields sought by the board of trustees and may also be suitable for community facilities such as a community hall or swimming pool, the provision of such community facilities is a matter decided under the Local Government Act 2002 as the funding needs to be budgeted through a Long-term Plan process. As such, I disagree that the district plan should identify land for such facilities, as sought by the submitter.
144. I note that submission [OS111.6] from the Pukerua Bay School Board of Trustees describes some general concerns of the school and community and the approach to the wider submission but does not itself set out any relief sought. As such, while I acknowledge the concerns raised, I do not recommend any specific amendments in response to that point.

3.4.3 Summary of recommendations

145. I recommend for the reasons given in the assessment, that the submissions from MoE [OS92.1, OS92.2, OS92.3 and OS92.4] be **rejected**.
146. I recommend for the reasons given in the assessment, that the submissions from Pukerua Bay School Board of Trustees [OS111.6] be **accepted in part**.

147. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.5 Significant Natural Area Buffers and Ecological Connections

3.5.1 Matters raised by submitters

148. Paul Clegg [OS11.4] seeks that the requirements to create SNA buffer areas and ecological connections are strengthened, "so that these become non-negotiable". The reasons stated include that it is essential to protect and restore the natural environment to support future generations and develop communities that are as resilient to climate change as possible.
149. The PBRA [OS47.14 and OS47.15] seeks:
- That two additional clauses are added requiring:
 - Ecological corridors and SNA buffer areas incorporate open space linkages to provide contiguous public access around their margins for recreation and maintenance; and
 - Design of buffer areas around wetlands to prevent excess runoff into the wetland; and
 - Clarification of the term '50m wide' in DEV-NG-R3-1.c.i and ii.
150. The reasons for the additional clauses are stated as to ensure public access is maintained around these public areas so they cannot be encroached on, and to increase the protection of these freshwater areas, and confusion around the length and width of the mapped ecological connection symbols.
151. QEII [OS82.5 and OS82.7] seeks clauses addressing buffer areas in DEV-NG-P3 and DEV-NG-R3 be amended to include 'or adjacent to' in relation to the SNAs to which they apply. The stated reasons include that development within the NGDA has the potential to adversely affect areas outside the NGDA boundary that have high ecological values, and the provisions as drafted do not apply to the QEII covenant (SNA029) that is located directly adjacent to the NGA boundary and proposed NCZ.

3.5.2 Assessment

152. In relation to the submission from Paul Clegg [OS11.4] the requirements for SNA buffer areas and ecological connections are included in DEV-NG-R3 which relates to subdivision of land within the NGDA. For subdivision to be considered as a controlled or restricted discretionary activity, the SNA buffer area and ecological connection requirements must be met. Where these are not met, the subdivision would be considered as a discretionary activity. Discretionary activity subdivision applications would be assessed against the objectives and policies, which includes at DEV-NG-P3-1.d consideration of maintaining and enhancing ecological values within the Development Area. As such, I consider that the requirements to create SNA buffer areas and ecological connections are sufficiently robust as set out in the proposed chapter, and no amendments are required in response to submission [OS11.4].
153. In relation to the submission from the PBRA [OS47.14], I do not consider that the amendments sought relating to incorporation of 'open space linkages' are appropriate as the structure plan

already shows identified existing and indicative tracks, and SNAs are not public assets. In relation to the clause requested to be added addressing the design of buffer areas to prevent runoff, while buffer areas may provide beneficial side-effects through preventing transport and discharge of sediment to the SNA, the discharge of sediment to water is a matter controlled by the regional council. Requirements for managing adverse effects of discharges of sediment on waterbodies are set out in the NES-F and the NRP.

154. In relation to the submission from the PBRA [OS47.15] seeking clarification of the term '50m wide' in DEV-NG-R3-1.c.i and ii, I consider that the current drafting is sufficiently clear and that no amendments are required.
155. In relation to the submission from QEII [OS82.5 and OS82.7] I agree that, as drafted, the provisions would not apply to SNAs located on adjoining allotments and that there is the potential for adverse effects on SNA029 as a result. However, I consider that the wording sought to be added should be clearer in relation to DEV-NG-R3, to ensure that the rules are able to be interpreted and implemented with certainty. As such, within the relevant clauses of DEV-NG-R3 I consider the words 'or directly adjoining' should be added. This will ensure that where an SNA is located along the boundary of the NGDA a buffer area will be required along that boundary when the allotment is subdivided. However, if an SNA is set back from the boundary (but which may still be considered to be 'adjacent') a buffer would not be required.

3.5.3 Summary of recommendations

156. I recommend for the reasons given in the assessment, that the Hearings Panel:

- a. **Amend** DEV-NG-P3 and DEV-NG-R3 as set out in Appendix A;

The recommended amendments are not shown here due to length.

157. I recommend that the submissions from Paul Clegg [OS11.4] and PBRA [OS47.14 and OS47.15] be **rejected**.
158. I recommend that the submissions from and QEII National Trust (QEII) [OS82.7] be **accepted in part**.
159. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.5.4 Section 32AA evaluation

160. In my opinion, the amendments to DEV-NG-P3 and DEV-NG-R3 are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:
- They will ensure that development of the NGDA enhances ecological values, including those values associated with SNAs located directly adjoining the NGDA. Consequently, they better give effect to DEV-NG-O2-8 and DEV-NG-P2-5 and are more efficient and effective than the notified provisions in achieving the objectives of the PDP.
 - The recommended amendments will not have any greater environmental, economic, social, and cultural adverse effects than the notified provisions. However, there will be benefits from improved plan interpretation and more efficient plan administration, and positive ecological effects through enhancement of ecological values of SNAs.

3.6 Infrastructure

3.6.1 General infrastructure

3.6.1.1 Matters raised by submitters

161. Judith Frost-Evans and Gay Hay [OS55.4] seeks that infrastructure upgrades are identified and prioritised, for the reason that services are currently under pressure and are not meeting the needs of the existing community.
162. The PRA [OS79.8 and OS79.15] seeks that:
- “PCC be proactive with central government [...] in seeking caveats on significant development that ensure provision for increased / improved infrastructure is planned alongside any such development”; and
 - “PCC to look broadly at the overall impacts of both in-fill and greenfields intensification on existing services and facilities, for example, transport planning in line with population growth, infrastructure renewal and development, access to local business areas, provision of schools and recreation areas, and protection for the environment”.
163. Alan Collett [OS99.6] does not specify any relief sought, but questions whether PCC is sufficiently satisfied there will be the necessary infrastructure to support such an increase in housing within Pukerua Bay, and states that the structure plan lacks detail, and the lack of detail available to existing residents is unacceptable.
164. The PBRA [OS47.13] seeks that resource consents for NGDA development are not issued until funding for the extra infrastructure is identified.

3.6.1.2 Assessment

165. As identified in the Section 32 Evaluation Report Part B: Northern Growth Development Area, the infrastructure requirements for the development of the NGDA for urban purposes is set out in the associated Infrastructure Report prepared by Envelope Engineering Limited. This concludes that the NGDA can be adequately serviced in terms of roading, stormwater, wastewater, potable water, electricity, telecommunications, and, if required, gas.
166. The PDP provisions, including those in the THWT – Three Waters and SUB – Subdivision chapters set out requirements for infrastructure to support development. These are supported by the proposed provisions in the DEV – NG – Northern Growth Development Area, including DEV-NG-O3 that seeks that:
- Infrastructure with sufficient capacity is provided at the time of subdivision for urban use and is developed in an integrated, efficient and comprehensive manner to meet the planned needs of the Northern Growth Development Area.*
167. The supporting provisions also include clause three of DEV-NG-P4, which clearly sets out that development that does not provide sufficient infrastructure to service its needs and/or constrains, limits or compromises the efficient provision of infrastructure to service the Structure Plan, would be inappropriate.
168. Specifically in relation to the submissions from Judith Frost-Evans and Gay Hay [OS55.4] and the PRA [OS79.8 and OS79.15], the details of the provision of the necessary infrastructure will be determined through future developer agreements under the Local Government Act. As such the

outcomes sought by these submissions will be achieved through methods outside of the district plan.

169. In relation to the submission from Alan Collett [OS99.6], while the structure plan does not specifically identify all the infrastructure required, the Infrastructure Report provides potential wastewater and potable water plans. Additionally, the supporting report Stormwater Management Site Assessment prepared by The Urban Engineers addresses the management of stormwater from development of the NGDA and includes a Draft Stormwater Management Plan. As such, there is a high level of information provided relating to the infrastructure to support the NGDA.
170. In relation to the submission from the PBRA [OS47.13], as noted above the funding for any necessary infrastructure will be determined through developer agreements under the Local Government Act. The NG – DEV chapters contains provisions that will ensure sufficient infrastructure is provided at the time of subdivision for urban use. Requirements for infrastructure to support subdivisions can be set out in conditions on consent, to ensure the outcomes sought are achieved. A summary of the Council's approach to infrastructure planning is provided in the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation, which describes the components that work together to provide sufficient 'plan enabled' capacity to meet expected demand for housing supply and business land, being the long-term plan (LTP), development contributions, and the PDP provisions.

3.6.1.3 Summary of recommendations

171. I recommend for the reasons given in the assessment, that the submissions from Judith Frost-Evans and Gay Hay [OS55.4] and the PRA [OS79.8 and OS79.15], be **accepted in part**.
172. I recommend for the reasons given in the assessment, that the submission from Alan Collett [OS99.6], be **rejected**.
173. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.6.2 Transport infrastructure

3.6.2.1 Matters raised by submitters

174. The PBRA [OS47.4, OS47.17, OS47.18 and OS47.19] seeks that:
- Residents are within a safe and reasonable walking distance of public transport, whether that be buses or train stations;
 - The connection to SH59 includes a safe crossing for pedestrians and cyclists over the state highway to allow non-car access to train stations to the south;
 - The feasibility of building another train station around Airlie Road is investigated to provide more convenient access to public transport to reduce the increase in traffic heading south on the state highway;
 - The concerns of safety and convenience to residents along most of the length of Muri Road, and many other recreational users of the road must be noted and be part of PCC's

consideration of resource consent applications for Stage 1 and subsequent stages of the development; and

- PCC works with other agencies and the developers to mitigate the impacts of development, particularly on access to public transport and movement into, around and out of the new communities, and to allow progressive access to these forms of movement as the new community is developed.
175. The reasons stated for the relief sought include that connectivity extends beyond the immediate Structure Plan area and into the connections with State Highway 59, access to public transport needs to make it easy for people to not use their private cars for travel, and access needs to be available as soon as possible to new residents to ensure public transport use becomes an ingrained habit.
176. Judith Frost-Evans and Gay Hay [OS55.3] seeks fewer cars, less reliance on cars and that a new guideline is created, for the reason that there is no provision for designing the urban environment for a car less future.
177. Guy Marriage [OS90.1] seeks a route over SH59 to the other side of the road and the provision of a new rail station midway between Pukerua and Plimmerton. The stated reasons include the projected increase in population from the development of the NGDA and Plimmerton Farm and the need to not have to drive to work.
178. Paul Clegg [OS11.6 and OS11.7] seeks requirements be added that no development is undertaken until the new access to SH59 is in place, and that residents must be consulted about any planned upgrades to Muri Road to enable safe access to the north of the site. The stated reasons include that Muri Road is currently one lane for much of its length and is completely unsuitable for any increase in traffic volume.
179. Alan Collett [OS99.5] does not specify any relief sought, but states that Objective 3(b) of the NPS-UD requires the area to be well serviced by existing or planned public transport, and questions how PCC intends to meet these criteria. The submitter also states that

...current Pukerua Bay rail station is limited in its capacity, it is often out of service and bus replacements are required. There are no park and ride facilities nor is there any land area to provide one. The proposed urban area is not within walking distance of this station especially for those with young families or the elderly or in severe weather.

3.6.2.2 Assessment

180. In relation to the submission from PBRA [OS47.4] and Judith Frost-Evans and Gay Hay [OS55.3], the structure plan includes identification of potential tracks for pedestrian and cycle use within the NGDA area, as well as indicative bus routes. This will enable appropriate access to public transport and encourage active transport modes. I do not consider that a new 'guideline' is necessary to address this matter.
181. The outcomes sought in submissions from PBRA [OS47.17] and Guy Marriage [OS90.1] are generally consistent with the following recommendations of the Integrated Transport Assessment (ITA) undertaken for the NGDA, prepared by Tim Kelly Transportation Planning Ltd:

investigations be initiated into the viability of providing a high standard of external pedestrian / cycle connectivity including the option of a bridge over SH59 linking to the

Ara Harakeke shared pathway and also a shared path linking to Taumata Street in Pukerua Bay (utilising the available road reserve on the eastern side of SH59);

[...]

liaison be initiated with GWRC regarding the likely viability and operating requirements of a bus feeder service between the development area and the rail stations, and the viability of an additional railway station in this area;

182. However, as indicated by the wording of the ITA recommendations, there remains a level of uncertainty as to the exact outcomes that will be achieved in relation to transport infrastructure. In relation to this, discussions with the various agencies, including GWRC, Metlink, and Waka Kotahi, are ongoing. Connection of access to the site from SH59 will trigger a resource consent requirement under that rule, which will enable more detailed consideration of the form of that connection. As the viability of an overpass and additional train station needs to be determined by the responsible organisations, I do not consider that any requirements for this infrastructure need to be included in the district plan framework. Specifically in relation to a new train station, initial indications are that this is unlikely due to a number of issues and constraints.
183. In relation to the submission from PBRA [OS47.18 and OS47.19] and Paul Clegg [OS11.6 and OS11.7], the DEV - NG - Northern Growth Development Area does not preclude the option of development of the NGDA occurring in stages, and anticipates that staged development may well occur due to the size of the development area. The potential for staged development is noted in the Infrastructure Report which states that:

It is currently anticipated that development of the Site will occur in multiple stages over a period of 15 – 20 years. Based upon the existing ownership, it is expected that initial development would occur closer to the SH59 and Muri Road access points, with the development areas being joined after a period of 5 – 10 years.

184. The PDP provisions in the INF – Infrastructure and TR – Transport chapters manage the effects of proposed new and upgrades to roads, connections to the transport network and on-site transport facilities. These will apply to any individual stages proposed for the development of the NGDA, and therefore will enable the effects of those stages to be appropriately managed.
185. As such, while it is likely that the connection to SH59 will be needed at an early stage of development to ensure safe and efficient roading connections, it would not be appropriate to require this to be completed before any development within the NGDA occurs, as there is a possibility it may not be required in order to enable the progression of a separate stage of development. Additionally, the need for any consultation on any proposed upgrades to Muri Road would be determined based on the scale of those upgrades, and would occur under separate processes.
186. In relation to the submission from Alan Collett [OS99.5], the submitter is correct that Objective 3(b) of the NPS-UD seeks that district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment that are well-served by existing or planned public transport. However, the submitter appears to have misinterpreted the objective, as this is only one of the listed situations where the objective would apply. The full text of the objective is:

Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:

- (a) *the area is in or near a centre zone or other area with many employment opportunities*
- (b) *the area is well-serviced by existing or planned public transport*
- (c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

[Emphasis added]

187. As identified above, the objective states 'in which one or more of the following apply'. As such, the outcome sought of more people, businesses and community services being enabled within, areas of an urban environment would apply where any of the three listed situations are met, rather than requiring all of the listed matters to be met. In any case, Objective 3 is generally aimed at intensification of existing urban areas and is given effect to through Policy 3 of the NPS-UD. Giving effect to Policy 3 of the NPS-UD is discussed in detail in Section 32 Evaluation Report Part B: Urban intensification – MDRS and NPS-UD Policy 3.
188. I also note that, contrary to the assertion of the submitter, and as noted in section 1.7.7.2 of the Section 32 Evaluation Report Part B: Northern Growth Area, the Pukerua Bay Station includes a park and ride facility with approximately 30 parking spaces.⁶ These spaces are located on both sides of the rail line.
189. Additionally, the Structure Plan identifies indicative bus routes, with DEV-NG-P2-4 requiring these to be provided for as Collector roads through the subdivision processes. While further work with GWRC and Metlink will be required to confirm future bus services and routes, the Collector road design standards set out in the PDP will enable the NGDA to be well-serviced by public transport.

3.6.2.3 Summary of recommendations

190. I recommend for the reasons given in the assessment, that the submissions from PBRA [OS47.4, OS47.17, OS47.18 and OS47.19] Judith Frost-Evans and Gay Hay [OS55.3] and Guy Marriage [OS90.1], be **accepted in part**.
191. I recommend for the reasons given in the assessment, that the submissions from Paul Clegg [OS11.6 and OS11.7] and Alan Collett [OS99.5], be **rejected**.
192. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.6.3 Stormwater management

3.6.3.1 Matters raised by submitters

193. TROTR [OS114.54 and OS114.55] seeks a detailed stormwater management plan to explain how tangibly stormwater will be managed, and states that:

The proposed changes to the Regional Policy Statement will be stricter in that just providing water sensitive urban design won't itself be indicative of adequate stormwater management; given that WSUD is limited in high gradient and low

⁶ <https://www.metlink.org.nz/getting-started/park-and-ride/>

permeable land, this leaves a more stringent approach regarding Te Rūnanga whaitua recommendations and its implementation in the Proposed Natural Resources Plan (PNRP).

Te Rūnanga consider objectives, policies, and rules that will come out of PNRP process to be more stringent on the stormwater management and water quality measures. Regarding further regulatory context, such as the PCC Notified Plan, in the absence of a detailed environmental and stormwater management plan, it is challenging to understand how NE-O3 and NE-O4 and THWT-O1 will be achieved.

3.6.3.2 Assessment

194. In relation to the submission point [OS114.54] on the need for a detailed stormwater management plan, a Draft Stormwater Management Plan for the NGDA was attached to the report 'Stormwater Management Site Assessment'. In order to give the contents of the Draft Stormwater Management Plan weight through RMA processes, it will need to be finalised and adopted by Council under the Local Government Act 2002. Additionally, I note that the Draft Stormwater Management Plan has been developed to reflect a level of detail that is appropriate to support the NGDA as included in Variation 1. The Draft Stormwater Management Plan is also intended to be updated as the land use of the site changes, and is expected to become more detailed as the design of any proposed urban development is undertaken.
195. In relation to the submission point [OS114.55] which refers to the amendments proposed to the RPS through Proposed Change 1, as well as the requirements of the NRP, the regulatory context was considered through the development of the Stormwater Management Site Assessment and the associated Draft Stormwater Management Plan. This included consideration of the requirements of the NRP, along with the anticipated changes to the RPS to respond to the NPS-UD and NPS-FW including incorporation of Te Mana o te Wai (noting that Proposed Change 1 had not been notified at the time the report was prepared).
196. I also note that the Freshwater Management Areas identified on the structure plan are a key way the proposal integrates with the requirements of the NPS-FW, NES-F, RPS and NRP, as set out in DEV-NG-P2.8, and will help to achieve the outcomes sought by NE-O3 and NE-O4 and THWT-O1.

3.6.3.3 Summary of recommendations

197. I recommend for the reasons given in the assessment, that the submission from TROTR [OS114.54 and OS114.55], be **rejected**.
198. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.7 Commercial zone

3.7.1 Matters raised by submitters

199. The PBRA [OS47.16] seeks that the suggestion in the Urban Design report to move the commercial centre away from the QEII protected area near the entrance from SH59 be reconsidered, to protect the QEII area and prevent environmental degradation of the bush.

200. Kāinga Ora [OS76.355] seeks that the Neighbourhood Centre is up-zoned to a Local Centre. No specific reasons are given.

3.7.2 Assessment

201. In relation to the submission from PBRA [OS47.16], the location of the commercial centre within the NGDA was assessed in the Section 32 Evaluation Report Part B: Northern Growth Development Area, within Table 19: High-level Options Analysis. That assessment concluded that the western location was the most appropriate. I do not consider that the location of the centre needs to be reconsidered.
202. In relation to the reason given by PBRA [OS47.16], I note that I have recommended in section 3.5 that the requirement for SNA buffer areas include SNAs located on directly adjacent sites. This will ensure that there is a buffer area identified within the NCZ along the boundary with SNA029.
203. In relation to the submission from Kāinga [OS76.355], consideration of alternative zoning for the commercial area within the NGDA was discussed in section 10.1.1 of the Section 32 Evaluation Report Part B – Northern Growth Development Area and the supporting document the 'Pukerua Bay Retail Centre Economic Assessment'. Those assessments concluded that NCZ was the most appropriate zone. The submitter has not provided any reasons for the relief sought to up-zone the NCZ to LCZ, or evidence that the LCZ would be a more appropriate zone. As such, I do not consider that the NCZ should be up-zoned to LCZ.

3.7.3 Summary of recommendations

204. I recommend for the reasons given in the assessment, that the submissions from PBRA [OS47.16] and Kāinga [OS76.355] be **rejected**.
205. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.8 Residential Intensification Precinct

3.8.1 Matters raised by submitters

206. Kāinga Ora [OS76.356] seeks that the MRZ and the Residential Intensification Precinct be applied within a walkable catchment of the centre.

3.8.2 Assessment

207. The residential area of the NGDA is proposed to be MRZ through Variation 1. This aspect of the relief sought by Kāinga Ora is therefore already provided for through Variation 1.
208. In relation to the application of the Residential Intensification Precinct (MRZ-RIP), I note that the commercial centre within the NGDA is proposed to be zoned NCZ. The Section 32 Evaluation Report Part B: Urban intensification – MDRS and NPS-UD Policy 3, states that:

Intensification precincts are not proposed around Neighbourhood Centres. This is because they only service the day to day needs of immediate surrounding residential neighbourhoods. Therefore, their role and scale do not support additional intensification over and above that provided by the MDRS.

209. The general approach is therefore not to apply the MRZ-RIP around an NCZ area. The appropriateness of up-zoning the commercial centre to LCZ, as also sought by Kāinga Ora, is discussed in section 3.7 above. Up-zoning the commercial centre to LCZ is recommended to be rejected.
210. Additionally, while the structure plan provides proposed roads and tracks, and indicative bus routes, the structure plan does not show the finer grained layout of roads or active travel pathways. This will be determined through later subdivision processes. As such, the 'walkable catchments' sought by Kāinga Ora is not able to be determined at this stage.
211. Consequently, I consider that it would be inappropriate to apply the MRZ-RIP within the NGDA.

3.8.3 Summary of recommendations

212. I recommend for the reasons given in the assessment, that the submission from Kāinga Ora [OS76.356] be **rejected**.
213. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.9 'Consistent' versus 'in accordance' with the Structure Plan

3.9.1 Matters raised by submitters

214. Pukerua Property Group Limited [OS59.7, OS59.9 and OS59.10] seeks that the term 'in accordance with' be replaced with 'consistent with' in DEV-NG-R1, R2 and R3, in relation to DEV-NG-Figure 1: Northern Growth Development Area Structure Plan. The reasons given are that requiring an activity to be 'in accordance with' the structure plan is too difficult a term to interpret at resource consent stage and may lead to unintended blunt decisions, and that the suggested wording recognises that structure plans are high level guidance documents and should not be treated as development plans to be replicated exactly in development proposals.

3.9.2 Assessment

215. While I consider that at one level the difference between 'consistent with' and 'in accordance with' is relatively minor, overall, for the reasons set out below, I consider that the use of the phrase 'in accordance with' is more appropriate than 'consistent with' in the context of the Development Area chapter.
216. The structure plan has been developed with significant input from technical experts to address relevant resource management issues associated with the development of the site for urban purposes. The structure plan also provides important direction as to the expected development of the site for the community and other stakeholders. As such, development that is not in accordance with the proposed structure plan should be scrutinised in greater depth, which is provided for through the proposed rule framework.
217. That rule framework provides for the potential for alternative development forms to also achieve the outcomes sought through the development area chapter. Where an activity or subdivision is not in accordance with the structure plan, a resource consent is required, or the activity is elevated to a higher activity status with discretionary being the most restrictive within the chapter. The policies provide directive guidance for processing such resource consents.

218. I disagree that the term 'in accordance with' is too difficult to interpret at resource consent stage. The term is used throughout the RMA⁷, and is therefore familiar to resource management practitioners. Similarly, the requirement for activities to be undertaken in general accordance with the plans and information submitted with a resource consent application is a common consent condition, and is therefore also well understood by resource consent planners as well as monitoring and enforcement staff.
219. Additionally, I note that other similar proposed district plans use the term 'in accordance with' in relation to development area provisions, for example the New Plymouth and the Waimakariri proposed district plans. The proposed provisions therefore reflect modern plan drafting under the RMA.

3.9.3 Summary of recommendations

220. I recommend for the reasons given in the assessment, that the submissions from Pukerua Property Group Limited [OS59.7, OS59.9 and OS59.10] be **rejected**.
221. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.10 Planning Maps

3.10.1 Development Area boundary

3.10.1.1 Matters raised by submitters

222. Ron Lucas on behalf of the landowner SS Pointon [OS22.1] seeks additional land be included within the Northern Growth Development Area and zoned residential, as identified in Figure 1 below.
223. The additional land sought to be included adjoins the northern boundary of the Northern Growth Development Area (identified by the yellow shading on Figure 1). The identified land totals approximately 4.337 hectares in area.
224. The reasons for the submission note that the Structure Plan identifies two roads and two pedestrian connection points at the northern boundary of the development area, and that the topography on the Pointon land to the north is "not too dissimilar to that shown as proposed residential on the structure plan", and that the rezoning sought based on the site contours would result in a better zone boundary.

⁷ Undertaking a word search on the RMA 1991 No 69 (Version as at 28 September 2022) reveals that 'consistent with' is used 60 times, while 'in accordance with' is used 447 times.

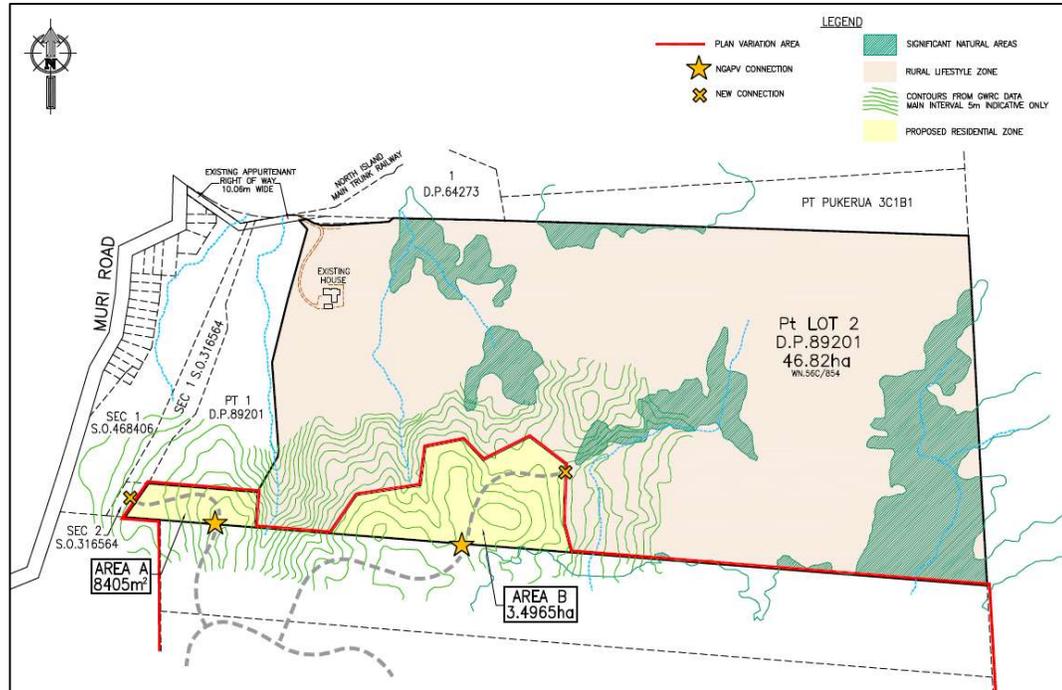


Figure 1: Attachment to Submission 22 identifying additional land sought to be included within the NGDA

3.10.1.2 Assessment

225. While the topography of the land is an important factor in identifying the area proposed to be zoned Medium Density Residential within the NGDA, it is not the only consideration.
226. The Section 32 Evaluation Report – Part B Northern Growth Development Area provides discussion of a range of technical considerations in section 8, which included summary discussion on the technical reports that assess and provide recommendations on the potential for urban development of the NGDA land.
227. The submitter has not provided any technical assessment of the additional land proposed to be included within the NGDA. As such, I do not consider that there is currently sufficient information on which to base a recommendation to support the inclusion of the additional land within the NGDA.

3.10.1.3 Summary of recommendations

228. I recommend for the reasons given in the assessment, that the submission from Ron Lucas on behalf of the landowner SS Pointon [OS22.1] be **rejected**.

3.10.2 Flood Hazard mapping

3.10.2.1 Matters raised by submitters

229. The GWRC [OS74.73] seeks that the planning maps be amended to include ponding zones and overland flow paths in flood hazard overlays in the Northern Growth Area, for the reason that it

is important to identify all areas subject to flooding hazards and to ensure the District Plan has regard to Proposed RPS Change 1 Policy 29.

3.10.2.2 Assessment

230. As noted in section 8.14 of the Section 32 Evaluation Report – Part B Northern Growth Development Area the Stormwater Management Assessment report prepared by The Urban Engineers Ltd considered the flood hazard risks on the site, and recommended Flood Hazard – Stream Corridor areas to be included on the PDP planning maps.
231. At the time of preparing the NGDA provisions, The Urban Engineers provided advice that as the area is at the top of the catchment and the site has a steep grade and defined gullies, the stream corridors would be sufficient to manage the flood hazard within the NGDA. However, it was also recommended that this be confirmed via hydraulic modelling of the site.
232. Wellington Water Limited have subsequently undertaken modelling for the area, which is shown in Figure 2 below. These modelling outputs are provided in the Statement of Evidence of Alistair Osborne on behalf of Porirua City Council (Flood Hazard Modelling).

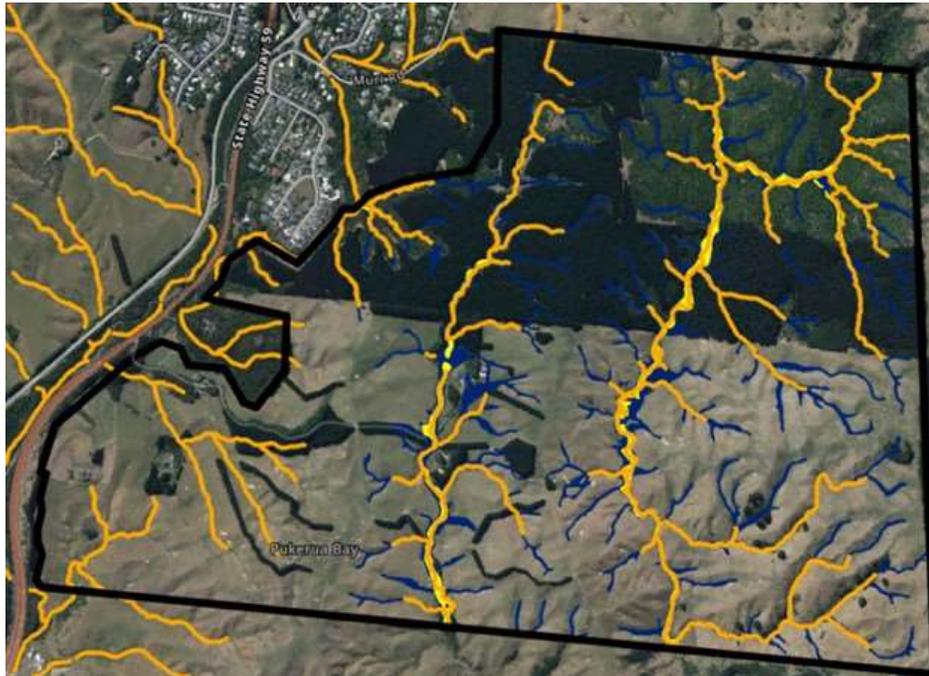


Figure 2: Wellington Water Limited flood modelling outputs for the NGDA

233. Given the modelling undertaken by Wellington Water Limited, I consider that it is appropriate to incorporate the new Flood Hazard areas identified in the NGDA within the PDP Flood Hazard overlay maps.

3.10.2.3 Summary of recommendations

234. I recommend for the reasons given in the assessment, that the Hearings Panel:
- Amend** the Flood Hazard overlays as set out in Appendix A;
235. I recommend that the submission from GWRC [OS74.73] be **accepted**.

236. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.10.2.4 Section 32AA evaluation

237. In my opinion, the amendments to the Flood Hazard overlays are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:

- They will ensure that the provisions of the NH – Natural Hazards chapter will be appropriately applied to future development of the NGDA and that risk from flood hazard will be managed appropriately. Consequently, they better give effect to the outcome sought by NH-O1 in relation to future development of the NGDA, and policy DEV-NG-P2-7 of the DEV – NG chapter, and are more efficient and effective than the notified provisions in achieving the objectives of the PDP.
- The recommended amendments will not have any greater adverse environmental, economic, social, and cultural effects than the notified provisions. However, there will be benefits in terms of the appropriate management of flood hazard risk within the NGDA and subsequent benefits in terms of people's health and wellbeing.

3.11 Chapter Introduction

3.11.1 Matters raised by submitters

238. The PBRA [OS47.1, OS47.3 and OS47.5] seeks:

- Additional wording under 'Urban Form' relating to a range of dwelling styles and sizes, and universal accessible design;
- Additional wording under 'Recreation areas' relating to potential for sports fields and provision of 'street-level open spaces'; and
- A new introductory section on 'Climate change and resilience'.

239. The reasons for the amendments sought include that housing in Pukerua Bay lacks variety, availability and affordability, Pukerua Bay has no sports fields, and that the plan does not acknowledge the increasing natural hazard risks from climate change.

240. Pukerua Property Group Limited [OS59.4] seeks additional wording under 'Freshwater Management Areas', being 'FMAs can accommodate uses compatible with urban activities including infrastructure, earthworks and amenity features.' The reasons stated for this include that a balanced approach is required to provide a pathway to weigh potentially competing outcomes in supporting technical documents, and there are other relevant planning instruments including the NES-F and NRP.

3.11.2 Assessment

241. I do not consider that the additional text sought by PBRA [OS47.1, OS47.3 and OS47.5] to be necessary or beneficial, and in some cases it seeks to include matters either not addressed by, or at a level of detail that is not appropriate to be covered by, district plans. For example, housing typology and size can be influenced, but not directed, by district plan provisions. Similarly, accessible design of buildings and other spaces is not a matter addressed by district plans.

Conversely, climate change and resilience are matters important to the development of the NGDA but are addressed in other chapters of the PDP such as NH – Natural Hazards. As such, I do not recommend any amendments to the introduction as a response to the submissions from the PBRA [OS47.1, OS47.3 and OS47.5].

242. In relation to the submission from Pukerua Property Group Limited [OS59.4], the NG – DEV chapter does not itself include any provisions that would restrict activities within the FMAs. As noted in the introduction, the FMAs acknowledge provisions that already apply to subdivision, use and development in these areas under the PDP, NRP, NPS-FM and the NES-F. However, I agree that it may be beneficial to recognise in the introduction that other activities may also need to locate or be undertaken within these areas to enable the wider development of the NGDA, and to avoid an overly restrictive interpretation of the identification of these areas on the structure plan.

3.11.3 Summary of recommendations

243. I recommend for the reasons given in the assessment, that the Hearings Panel:
- a. **Amend** the chapter introduction as set out below and in Appendix A;

Freshwater Management Areas

The Freshwater Management Areas identify opportunities to maintain and enhance terrestrial and freshwater ecology and improve water quality. They can also provide for water sensitive design approaches to stormwater management including catchment scale detention devices; provide increased resilience to flood hazards; connect the community to water and provide for passive recreation, and; create high quality amenity for the community. Other activities may also need to locate or be undertaken within these areas to enable the wider development of the area, such as infrastructure or earthworks. The Freshwater Management Areas also acknowledge provisions that already apply to subdivision, use and development in these areas under the District Plan, Natural Resources Plan, NPS-FM and the NES-F.

244. I recommend that the submission from Pukerua Property Group Limited [OS59.4], be **accepted in part**.
245. I recommend that the submissions from PBRA [OS47.1, OS47.3 and OS47.5], be **rejected**.
246. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.11.4 Section 32AA evaluation

247. No section 32AA evaluation is necessary, as the recommended amendments are not to provisions of the chapter.

3.12 Objectives

3.12.1 DEV-NG-01

3.12.1.1 Matters raised by submitters

248. QEII [OS82.2] seeks that the objective is amended to include 'while balancing the environmental, cultural, and recreational values in the area'. The reason stated is that, "[t]he importance of developing only within the area's ecological capacity needs to be front and centre and included within the high-level objectives of this section".

3.12.1.2 Assessment

249. I do not consider that the requested addition to DEV-NG-01 is necessary or beneficial. The objective is intended to provide a clear articulation of the primary purpose of the NGDA. The other objectives of the PDP located within the relevant chapters also apply to the NGDA, and articulate the outcomes sought in relation to cultural, environmental and recreational matters. Where relevant, the specific environmental, cultural, and recreational objectives for the NGDA are articulated in DEV-NG-02.

3.12.1.3 Summary of recommendations

250. I recommend for the reasons given in the assessment, that the submission from QEII [OS82.2], be **rejected**.

251. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.12.2 DEV-NG-02

3.12.2.1 Matters raised by submitters

252. The PBRA [OS47.7 and OS47.8] seeks a new clause related to community facilities, and inclusion of 'on-site freshwater management areas' in DEV-NG-02-8. The stated reasons include to ensure community facilities are flexible, and to reinforce the protection of on-site freshwater bodies.

253. Judith Frost-Evans and Gay Hay [OS55.6, OS55.7 and OS55.8] seek that 'well-functioning urban environment consistent with' and 'quality living environment that is connected, accessible and safe' mean, and clarification of what ecological values are to be maintained and protected.

254. Pukerua Property Group Limited [OS59.5] seeks clause DEV-NG-02-5 be amended to read 'Housing (including medium density housing) with...'. No specific reasons are given.

255. The GWRC [OS74.63] seeks that DEV-NG-02-7 be amended to clarify that new subdivision, use and development must minimise reliance on private vehicles, in order to have regard to Policy CC.2 in Proposed Change 1.

256. Waka Kotahi [OS81.31] seeks that DEV-NG-02-7 be amended to refer to a 'safe and connected' transport network, and the word 'encourage' be replaced with 'includes', for the reasons that this is in line with the Porirua Growth Strategy and encourage only requires active transport modes to be considered, whereas includes puts emphasis on active transport modes being required.

257. QEII [OS82.3] seeks that a new clause is added, being:

Development that maintains and protects, and where possible, enhances ecological values of Significant Natural Areas (including but not limited to those identified in SCHED7 – Significant Natural Areas).

258. The reasons for the additional clause include to emphasise the importance of maintaining, protecting, and where possible enhancing terrestrial indigenous biodiversity to complement existing clause 8.

3.12.2.2 Assessment

259. As noted in section 3.4.2 above, it is not appropriate for the district plan to attempt to direct the design of community facilities. As such, the amendment sought by the PBRA [OS47.7] is not appropriate. The amendment sought to DEV-NG-O2-8 by the PBRA [OS47.8] to refer to 'on-site freshwater management areas' is unnecessary as this is already addressed by the reference to receiving waterbodies.

260. In relation to the submissions from Judith Frost-Evans and Gay Hay [OS55.6, OS55.7 and OS55.8], 'well-functioning urban environment' is a term introduced and defined by the NPS-UD. The 'quality living environment that is connected, accessible and safe' is further articulated by and assessed against the NG – DEV policies. The ecological values to be maintained and protected are identified in the Ecological Assessment undertaken for the NGDA.

261. While I acknowledge that not all residential development within the NGDA will likely achieve medium density, I disagree with the submission from Pukerua Property Group Limited [OS59.5] seeking to amend DEV-NG-O2-5 to only refer to medium density housing as being 'included' within the NGDA. Strategic objective UFD-01 seeks that 'Porirua grows in a planned, compact and structured way'. The MRZ applies across the site. As proposed through Variation 1, MRZ-01 seeks a 'planned built form of predominantly three-storey buildings'. As such, taking all of these matters into account, I consider that the clause would better refer to 'predominantly medium density housing...'. This would recognise that medium density development may not always occur on every allotment, but overall would give effect to UFD-01 and be consistent with MRZ-01.

262. In relation to the submission from GWRC [OS74.63], I note that Policy CC.2 of Proposed Change 1 is focused on 'travel demand management plans' and does not appear to in itself require district plans to seek to minimise reliance on private vehicles. However, having regard to the wider objectives and policies of Proposed Change 1, including Policies CC.1, CC.9 and 57, mode shift from private vehicles to public transport is a clear outcome sought. As such, I consider that additional wording in DEV-NG-O2-7 to include public transport and minimising reliance on private vehicles is appropriate.

263. I do not agree with the submission from Waka Kotahi [OS81.31] in relation to the inclusion of 'safe and connected' in DEV-NG-O2-7. The INF – Infrastructure chapter objectives, which will also apply to any proposed development of the NGDA, sufficiently address the need for the transport network to be connected and safe. Similarly, I also disagree with the replacement of the word 'encourage' with 'includes' in the clause, as the clause relates to the overall urban form rather than the transport network itself. The submitter's concern that the use of 'encourages' will only require active transport modes to be considered is mitigated by the applicability of the wider PDP provisions in relation to the requirements for active transport infrastructure, as well

as the identification of proposed tracks on the structure plan which development will need to be in accordance with.

264. I do not consider that the additional clause sought by QEII [OS82.3] is required as ecological values are already addressed by clause eight. However, I do acknowledge that this could be clarified in that clause through the addition of a comma after the word 'values'.

3.12.2.3 Summary of recommendations

265. I recommend for the reasons given in the assessment, that the Hearings Panel:

- a. **Amend** DEV-NG-O2 as set out below and in Appendix A;

DEV-NG-O2	Planned urban built environment of the Northern Growth Development Area
<p>Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:</p> <ol style="list-style-type: none"> 1. A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan; 2. A built urban form that responds to the natural landform; 3. A quality living environment that is connected, accessible and safe; 4. A high quality public open space and recreation network that is easy to access and meets the needs of the local community; 5. <u>Predominantly m</u>Medium density housing with a variety of housing types, sizes and tenures; 6. A neighbourhood centre that serves the needs of the local community; 7. An urban form that is integrated with the transport network, and encourages <u>public and</u> active transport modes <u>while minimising reliance on private vehicles</u>; and 8. Development that maintains and protects and, where possible, enhances ecological values, and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments. 	

266. I recommend that the submission from GWRC [OS74.63] and QEII [OS82.3] be **accepted in part**.

267. I recommend that the submissions from PBRA [OS47.7 and OS47.8], Judith Frost-Evans and Gay Hay [OS55.6, OS55.7 and OS55.8], Pukerua Property Group Limited [OS59.5] and Waka Kotahi [OS81.31], be **rejected**.

268. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.12.2.4 Section 32AA evaluation

269. In my opinion, the amendments to DEV-NG-O2 are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:

- They will clarify that the outcome sought for the residential areas of the NGDA will predominantly be medium density in nature but that a range of housing densities may be provided. The amendments will also clarify the emphasis on public and active transport modes within the NGDA, as well as that enhancement of ecological values across the NGDA is sought along with the health and wellbeing of receiving waterbodies. Consequently, they have regard to relevant provisions in Proposed Change 1 relating to reliance on private vehicles and better give effect to strategic direction HO-

O1 and objectives RESZ-O1, RESZ-O3 and MRZ-O1, and are more efficient and effective than the notified provisions in achieving the objectives of the PDP.

- The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions. However, there will be benefits from improved plan interpretation and more efficient plan administration.

3.12.3 DEV-NG-O3

3.12.3.1 Matters raised by submitters

270. The PBRA [OS47.9] seeks that the objective be amended to include reference to the anticipated impact of more extreme weather events resulting from climate change.

3.12.3.2 Assessment

271. While I agree that any new infrastructure needs to take into account the potential impacts of climate change, I consider that this matter is already sufficiently addressed in other parts of the PDP. Specifically, I note that the Wellington Water Regional Standard for Water Services May 2019, which is referenced in the THWT- Three Waters Chapter, includes requirements to consider climate change impacts.

3.12.3.3 Summary of recommendations

272. I recommend for the reasons given in the assessment, that the submissions from PBRA [OS47.9] be **rejected**.

273. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.13 Policies

3.13.1 DEV-NG-P2

3.13.1.1 Matters raised by submitters

274. The PBRA [OS47.10 and OS47.11] seeks that:

- A new clause 4.d is added that reads, 'Allows for the staging of the development in a manner that supports progressive access to public transport and open space connectivity'; and
- Clause ten is amended to read, 'Provides parks, reserves, pathways and open space areas through the full extent of the built areas, including a mixed-use neighbourhood community park and neighbourhood parks, street-level gathering places, and gully and hilltop reserves where opportunities exist'.

275. The reasons stated are to ensure that public transport and ease of movement are available to new residents as they move into the development, open spaces are within easy walking distance for all parts of the development, and allowing for the possibility of sports playing fields and places where neighbours can gather close to their houses.

276. Pukerua Property Group Limited [OS59.6] seeks that an additional subclause be added to clause eight addressing earthworks within FMAs for urban development, with the stated reasons including the need for a balanced approach to provide a pathway to weigh potentially completing outcomes in supporting technical documents.
277. The GWRC [OS74.70] seeks that the wording of clause eight be amended to refer to 'impacts on' rather than 'within' FMAs, and within clause nine clarification that the term 'hydraulic neutrality' is consistent with the definition of 'hydrological controls' in Proposed Change 1. The reasons stated in relation to clause eight include that all development will impact FMAs and that the policy should be broader. In relation to the amendments sought to clause nine, the reasons include to ensure that the clause gives effect to the NPS-FM and has regard to Policy FW.3 of Proposed Change 1, and that the term 'hydraulic neutrality' is limited to the control of peak flows which is useful for mitigating flooding effects, but does not mitigate effects on ecosystem health.
278. Waka Kotahi [OS81.33] seeks that subclause 4.c is amended to refer to 'active modes' rather than 'pedestrian', and two new subclauses are added being, "is safe for all transport users" and "[p]rovides for active transport". The reasons stated include to ensure that subdivision provides a transport network layout and design that is safe and to provide for all active modes and transport.
279. QEII [OS82.4] seeks that subclause 5.a is amended to refer to SNAs as including but are not limited to those identified in SCHED7 – Significant Natural Areas, and replacing clause six with "[f]ollowing the effects management hierarchy with regard to addressing adverse effects on waterbodies, including by avoiding adverse effects on waterbodies where possible". The reasons stated include that 'minimising' adverse effects on waterbodies is a very low bar and that avoiding adverse effects where possible should be considered and attempted first, in accordance with the effects management hierarchy.

3.13.1.2 Assessment

280. While development staging may be able to be undertaken in a manner that provides progressive access to public transport as sought by PBRA [OS47.10], I consider that, contrary to the further submission from GWRC [FS74.95], including policy direction to require this may be inconsistent with Policy 57 as amended by Proposed Change 1 which includes:

[...] require land use and transport planning within the Wellington Region is integrated in a way which:

[...]

(e) provides for well-connected, safe and accessible multi modal transport networks while recognising that the timing and sequencing of land use and public transport may result in a period where the provision of public transport may not be efficient or practical;

281. As such I do not consider that the additional clause sought by the PBRA is appropriate.
282. In relation to amendments sought by the PBRA [OS47.11] to clause ten, I consider that these potentially add confusion to the intent of the clause. The neighbourhood community park and neighbourhood reserve locations are identified on the structure plan. It is not clear what benefit of stating 'through the full extent of the built areas' would add. I also consider that it is unclear what a 'mixed-use' neighbourhood community park or 'street-level gathering places' would mean. From the submitter's reasons I presume a 'street-level gathering place' would be a smaller

reserve area which provides for activities at a very localised scale. Such highly localised assets would need to be agreed by relevant Council teams to ensure integration within the wider recreational network, including maintenance arrangements. I consider that the current wording of the clause sufficiently allows for consideration of provision of such assets, and therefore that the requested amendments are not required.

283. I do not consider that the additional subclause under clause eight sought by Pukerua Property Group Limited [OS59.6] is appropriate. Clause eight refers to the FMAs and, when read in context of the wording of the policy, requires that the design and layout of a proposed subdivision demonstrates that use and development within the FMAs addresses the matters listed in subclauses 8.a to 8.c which relate to requirements under the NES-F, NRP and requirements of other chapters of the PDP. The additional clause sought by Pukerua Property Group Limited [OS59.6] appears to be sought to ensure that earthworks can be undertaken within the FMAs for urban development purposes but is worded in a way that would require the proposed subdivision to demonstrate that earthworks are provided for by the use and development within the FMA. I consider this is confused between its intent and the actual policy outcome. In any case, I consider that the wording of clause eight is sufficiently clear, through its general reference to use and development, that earthworks are not precluded from being undertaken within the FMAs.
284. Similarly, I consider that the amendment sought by GWRC [OS74.70] to clause eight is not appropriate. The mapped FMAs were identified as areas which could deliver multiple outcomes including stormwater management, biodiversity enhancement, urban amenity, and recreation opportunities. They were not intended to function as an overlay within the PDP. The amendment sought by GWRC [OS74.70] to clause eight would have the effect of consideration of the FMAs as an overlay and is therefore not appropriate.
285. The associated request by GWRC [OS74.70] for the term 'hydraulic neutrality' in clause nine to be consistent with the definition of 'hydrological controls' in Proposed Change 1 is also inappropriate.
286. In relation to the mitigation of effects on ecosystem health, the allocation of responsibilities for land use controls for indigenous biodiversity are set out in Policy 61 of the RPS. Proposed Change 1 does not propose amendment to Policy 61 other than changing the terminology from 'biological diversity' to 'biodiversity'. The policy is therefore proposed to read:

[...]

(b) Wellington Regional Council shall be responsible for developing objectives, policies, rules and/or methods in regional plans for the control of the use of land to maintain and enhance ecosystems in water bodies and coastal water. This includes land within the coastal marine area, wetlands and the beds of lakes and rivers; and

(c) city and district councils shall be responsible for developing objectives, policies, rules and/or methods in district plans for the control of the use of land for the maintenance of indigenous biodiversity. This excludes land within the coastal marine area and the beds of lakes and rivers

287. If the intention of the request in relation to 'hydrological controls' is to ensure the district plans include land use controls to address effects on indigenous biodiversity within water bodies, this would appear to be inconsistent with the allocation of responsibilities under Policy 61 of the RPS.

288. The reasons also refer to Proposed RPS Change 1 Policy FW.3 and the definition for hydrological controls. Clause (m) of Policy FW.3 would require district plans to include provisions that "[r]equire hydrological controls to avoid adverse effects of runoff quantity (flows and volumes) and maintain, to the extent practicable, natural stream flows". The same clause is included in Policy 14 in relation to regional plans, and Policy 42 in relation to the regional council's consideration of resource consent applications.
289. I note that I addressed a similar matter in section 3.5 of the Officer's Report: Part B – Three Waters, heard in Hearing Stream 4 for the PDP. As noted in that report, the GWRC has functions for the control of the use of land for the purpose of maintenance of the quantity of water in water bodies under section 30(1)(c)(iii) of the RMA. These functions are exercised through Rules R49 and R50 of the NRP. I have not changed my position as articulated in that report, and as such, having had regard to Policy FW.3 of Proposed Change 1, I do not recommend any amendment to DEV-NG-P2.
290. In relation to the submission from Waka Kotahi [OS81.33], I agree that subclause 4.c should be amended to replace the term 'pedestrian', however I consider that the clause should refer to refer to 'active transport modes' consistent with DEV-NG-O2-7. I also agree that an additional clause addressing the safety of the transport network is appropriate as this would give effect to objectives, and support associated policies, in the INF – Infrastructure chapter. However, I do not consider that the additional clause for active transport is necessary, as this matter is already addressed within the policy.
291. In relation to the submission from QEII [OS82.4], I do not consider that the requested amendments to subclause 5.a are required, as the entire NGDA has been subject to an Ecological Assessment which identified and mapped SNAs. Variation 1 was subsequently notified with additional SNAs within the area and in SCEHD7. I also do not consider that clause six should be replaced as sought by the submitter as the application of the effects management hierarchy set out in the NPS-FM is to be undertaken by the relevant regional council.

3.13.1.3 Summary of recommendations

292. I recommend for the reasons given in the assessment, that the Hearings Panel:
- a. **Amend** DEV-NG-P2 as set out below in section Appendix A;

DEV-NG-P2	Subdivision
	<p>Provide for subdivision that is in accordance with the Northern Growth Development Area Structure Plan, and where the design and layout of the subdivision:</p> <p>[...]</p> <p>4. Provides a transport network layout and design that:</p> <p style="padding-left: 20px;">a. Is safe for all transport users;</p> <p style="padding-left: 20px;">ab. Recognises and provides for transport connections at the boundaries of the Development Area where opportunities exist;</p> <p style="padding-left: 40px;">[...]</p> <p style="padding-left: 20px;">ed. Provides for pedestrian active transport modes and open space connectivity, including by incorporating legal public access along indicative track routes identified on the Structure Plan, and providing for opportunities to create recreational and open space linkages;</p> <p>[...]</p>

293. I recommend that the submissions from Waka Kotahi [OS81.33] be **accepted in part**.
294. I recommend that the submissions from the PBRA [OS47.10 and OS47.11], Pukerua Property Group Limited [OS59.6], Gray Street Pukerua Bay Residents Group [OS65.3], GWRC [OS74.70] and QEII [OS82.4], be **rejected**.
295. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.13.1.4 Section 32AA evaluation

296. In my opinion, the amendments to DEV-NG-P2 are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:
- They will ensure that the consideration of the transport network proposed through subdivision applications explicitly includes safety and the provision for all active transport modes. Consequently, they better give effect to strategic objectives UFD-O3, UFD-O5 and FC-O1 along with objectives INF-O3, INF-O4 and SUB-O1-3, and are more efficient and effective than the notified provisions in achieving the objectives of the PDP.
 - The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions. However, there will be benefits from improved plan interpretation and more efficient plan administration.

3.13.2 DEV-NG-P3

3.13.2.1 Matters raised by submitters

297. The PBRA [OS47.20] seeks that 'sites of significance' be added to DEV-NG-P3-3, to provide stronger protection and identification of discrete sites that may have culture, spiritual or historical values.
298. Waka Kotahi [OS81.34] seeks that DEV-NG-P3-1.f reads, 'A safe and connected transport networks that provides for active modes and transport and that allows ease of movement to, from and within the Development Area'. The reasons stated include that, as currently drafted the policy only addresses the connectivity of the transport network and does not adequately provide for active modes and transport.

3.13.2.2 Assessment

299. I do not agree with the amendment sought by the PBRA [OS47.20], as the PDP maps included Sites and Areas of Significance to Māori (SASM) as a mapped overlay and there are no SASM identified within the NGDA. The PBRA has not provided any evidence that there are sites of significance that require protection within the NGDA. I do note, however, that Council is currently undertaking work with Ngāti Toa to identify additional SASM for inclusion in the PDP through a future variation. I understand that, currently, there are no sites being considered that are located within the NGDA.
300. In relation to the submission from Waka Kotahi [OS81.34], I agree that the subclause should refer to a 'safe' transport network. However, rather than referring to providing for 'active modes and transport', I consider the wording should be simpler and instead refer to 'all modes'. I

consider that these amendments would assist in giving effect to relevant transport objectives in the INF – Infrastructure chapter.

3.13.2.3 Summary of recommendations

301. I recommend for the reasons given in the assessment, that the Hearings Panel:

- a. **Amend** DEV-NG-P3 as set out below in section Appendix A;

DEV-NG-P3	Potentially appropriate development
	<p>Only allow subdivision, use and development that is potentially not in accordance with the Northern Growth Development Area Structure Plan where it is demonstrated that it is appropriate for such subdivision, use or development to occur within the Development Area, having regard to whether:</p> <ol style="list-style-type: none"> 1. The purpose and effects of the subdivision, use or development are likely to constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan, including consideration of: <ul style="list-style-type: none"> [...] f. Safe and Connected transport networks that allow ease of movement for all modes to, from and within the Development Area; and [...]

302. I recommend that the submissions from Waka Kotahi [OS81.34] be **accepted in part**.

303. I recommend that the submissions from the PBRA [OS47.20] be **rejected**.

3.13.2.4 Section 32AA evaluation

304. In my opinion, the amendments to DEV-NG-P3 are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:

- They will ensure that the safety of all transport modes is explicitly considered through resource consent applications which are potentially not in accordance with the Northern Growth Development Area Structure Plan. Consequently, they better give effect to objective INF-O3 and SUB-O1-3 and are more efficient and effective than the notified provisions in achieving the objectives of the PDP.
- The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions. However, there will be benefits from improved plan interpretation and more efficient plan administration.

3.13.3 DEV-NG-P4

3.13.3.1 Matters raised by submitters

305. The PBRA [OS47.12] seeks that:

- An additional clause is added that reads:

Compromise any cultural, spiritual and/or historical values, sites of significance, interests or associations of importance to Ngāti Toa Rangatira;

- The word 'extra' is added before 'infrastructure' in DEV-NG-P4-3.

306. The reasons stated include that the additional clause is needed as a criterion to identify inappropriate development that should not proceed in order to give the values more significance, and adding 'extra' will ensure that development does not proceed until the extra infrastructure that is needed, and its funding, are identified.
307. The GWRC [OS74.72] seeks that an additional clause is added addressing areas of high flood hazard risk, to ensure the policy has regard to Proposed Change 1 Policies 29 and 51.
308. QEII [OS82.6] seeks that an additional clause is added addressing the ability to protect SNAs and waterbodies, for the reason that this must be a priority given the rarity of these ecosystems and the intensity of surrounding development.

3.13.3.2 Assessment

309. I do not agree with the submission from the PBRA [OS47.12] in relation to the addition of the word 'extra' as it is not clear what this term would actually apply to. The provisions within the chapter already refer to sufficient infrastructure. I consider the addition of the word 'extra' is unnecessary and would add confusion, and therefore would not be appropriate.
310. The submissions from PBRA [OS47.12], GWRC [OS74.72] and QEII [OS82.6] all seek additional clauses in DEV-NG-P4 to address specific matters, being potential matters of importance to Ngāti Toa Rangatira, areas of high Flood Hazard risk, and SNAs, respectively. In all cases I consider that the additional clauses sought are not required, as the proposed NG – DEV Northern Growth Development Area chapter and the wider PDP chapters sufficiently address these matters.
311. DEV-NG-P3 sets out the matters to be considered when a proposal is potentially not in accordance with the NGDA Structure Plan. That policy includes subclauses relevant to the matters raised by PBRA [OS47.12], GWRC [OS74.72] and QEII [OS82.6], and therefore would allow these to be appropriately considered through resource consent processes.
312. DEV-NG-P4 is intended to avoid development occurring that will not achieve the specific objectives of the NGDA. This is why it is specific to the Structure Plan, the planned urban built environment, and the provision of sufficient infrastructure.
313. As such, I do not recommend any amendment to DEV-NG-P4.

3.13.3.3 Summary of recommendations

314. I recommend for the reasons given in the assessment, that the submissions from the PBRA [OS47.12 and OS47.13], GWRC [OS74.72] and QEII [OS82.6], be **rejected**.
315. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.14 Rules

3.14.1 Matters raised by submitters

316. The Gray Street Pukerua Bay Residents Group [OS65.4] seeks that any development not in accordance with the standards of the Northern Growth Development Area Structure Plan, and/or does not comply with the relevant provisions in the District Plan, has the requirement

for the community to be notified and given the opportunity to provide feedback. The submitter also seeks the section 95A exemption for notification and review removed. The stated reasons include transparency and that the community that lives in Gray Street is at the interface of development and are heavily invested in the Structure Plan, particularly the ecological values.

3.14.2 Assessment

317. The rules in the DEV - NG - Northern Growth Development Area chapter that preclude public notification are set out in Table 32 in the Section 32 Evaluation Report Variation 1: Part B – Northern Growth Development Area. This includes the rationale for the notification preclusion statements included in the DEV-NG - Northern Growth Development Area chapter rules.
318. Limited notification is not precluded under DEV-NG-R1-2, DEV-NG-R2-2 or DEV-NG-R4-1. As such, if any affected parties are identified through the normal resource consent process, limited notification to those parties can still be made. I also note that no notification preclusion statements are included under DEV-NG-R3 relating to subdivision.
319. As such, I do not consider that any amendments to the notification preclusion statements are necessary or appropriate.

3.14.3 Summary of recommendations

320. I recommend for the reasons given in the assessment that the submissions from Gray Street Pukerua Bay Residents Group [OS65.4] be **rejected**.
321. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.15 Northern Growth Development Area Structure Plan

3.15.1 Matters raised by submitters

322. The Gray Street Pukerua Bay Residents Group [OS65.1, OS65.2 and OS65.6] seeks that:
- More detailed Ecological Connections on the Structure Plan Map, to be used as the guidance for the NGDA;
 - The Structure Plan map clearly identify to correct scale the requirement of the 50 metre wide Ecological Connections and for these to be situated directly adjacent to the existing PCC reserve land to create a contiguous corridor, with no road severance allowable; and
 - Boxed areas replace the blue arrows shown on DEV-NG-Figure 1 Northern Growth Development Area Structure Plan indicating the ecological connection areas.
323. The reasons stated include to ensure a contiguous ecological corridor which will limit the effects of ecosystem fragmentation, protect the waterways and wetlands within the development area and in the adjacent PCC owned reserve land, and to mitigate the impact of habitat loss in a meaningful manner.

3.15.2 Assessment

324. The Ecological Connections identified on the Structure Plan in the vicinity of Gray Street are shown by the blue arrows in Figure 3 below.



Figure 3: Excerpt of DEV-NG-Figure 1 Northern Growth Development Area Structure Plan

325. The Gray Street Pukerua Bay Residents Group seeks that the blue arrows are replaced by the boxes shown in Figure 4 below. These areas are located adjoining the boundary of the NGDA.



Figure 4: Ecological connection areas sought by Gray Street Pukerua Bay residents Group

Source: Adapted from the figure provided in Submission 65

326. The Ecological Connections shown on the Structure Plan in Figure 3 are shown in Figure 5 below with a width of 50 metres, as required by the provisions in DEV-NG-R3.



Figure 5: Ecological connections near Gray Street shown with a width of 50m

327. I agree that the ecological connection between SNA010 and SNA225 would be better to be aligned with the NGDA boundary to the northwest and positioned so that the connection adjoins that boundary. This would have benefits for the efficient use of land through avoiding the creation of an isolated area of land between the eastern ecological connection shown in Figure 5 and the site boundary, while still achieving the positive ecological outcomes sought to be provided by the creation of the ecological connection.
328. Similarly, I agree that the western ecological connection shown in Figure 5 should be extended slightly to the south to ensure that the area provides a complete connection with SNA029.
329. However, assuming the ecological connection discussed above between SNA010 and SNA225 is created, the total area of usable land north of SNA225 within the NGDA is approximately 6,400 square metres. The ecological connection requested by the submitter adjoining the site boundary north of SNA225 would leave an awkwardly-shaped and isolated usable area of land between the SNA and the ecological connection, with an approximate area of just 875 square metres. I do not consider that that would be an efficient use of land, while also not providing any substantial value as an ecological connection.

3.15.3 Summary of recommendations

330. I recommend for the reasons given in the assessment, that the Hearings Panel:
- a. **Amend** the Ecological Connections shown on DEV-NG-Figure 1 Northern Growth Development Area Structure Plan so that;

- i. The ecological connection between SNA010 and SNA225 is aligned with the NGDA boundary to the northwest, and positioned so that the connection adjoins that boundary; and
 - ii. The ecological connection between SNA225 and SNA029 is extended slightly to the south to ensure that the area provides a complete connection with SNA029.
331. I recommend that the submissions from Gray Street Pukerua Bay Residents Group [OS65.2, OS65.1 and OS65.6] be **accepted in part**.
332. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.15.3.1 Section 32AA evaluation

333. In my opinion, the amendments to the Ecological Connections shown on DEV-NG-Figure 1 Northern Growth Development Area Structure Plan are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:
- They will ensure that the ecological connections achieve the intended outcome while also not resulting in inefficient use of land resources. Consequently, they better give effect to strategic objective REE-O5 as well as DEV-NG-O2-8 and DEV-NG-P2-5.b, and are more efficient and effective than the notified provisions in achieving the objectives of the PDP.
 - The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions. However, there will be benefits from improved plan interpretation and more efficient plan administration.

3.16 APP17 - Ecological Corridors and SNA Buffer Areas

3.16.1 Matters raised by submitters

334. The Gray Street Pukerua Bay Residents Group [OS65.5] seeks that the type of planting required in the Ecological Connections to be specified as large trees suitable as habitat for native birds.
335. QEII [OS82.9] seeks that additional wording be included in Part B clause 2(u) that requires eco-sourcing of plants. The reasons given are that eco-sourced plants create more representative eco-systems, are more likely to survive, and ensure that genetic diversity is maintained. Non-eco-sourced plants are stated as creating a risk to the established values in the areas they are being planted to buffer and create a risk of hybridisation and out-competing local natives.

3.16.2 Assessment

336. I disagree with Gray Street Pukerua Bay Residents Group [OS65.5] that the appendix needs to specifically state that large trees suitable as habitat for native birds are required. The appendix sets out in Part B (1) (a) to (d) the criteria that need to be achieved by the proposed planting. In some cases, these criteria may be better achieved through a range of plants that may or may not include 'large trees'.
337. Similarly, while I recognise and acknowledge the general desire for and benefits of eco-sourcing of plants, I consider that a requirement for plants to always be eco-sourced may result in unintended consequences in that the most appropriate plant in a certain situation may not be

able to appropriately eco-sourced. I also note that the information that is required to be included with the planting plan, which includes the proposed sourcing of the plants, can be reviewed by Council staff through the resource consent process and conditions imposed if required. Such conditions could specify that plants must be eco-sourced.

3.16.3 Summary of recommendations

338. I recommend for the reasons given in the assessment, that the submissions from Gray Street Pukerua Bay Residents Group [OS65.5] and QEII National Trust [OS82.9] be **rejected**.
339. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.17 Other Methods

3.17.1 Matters raised by submitters

340. The PBRA [OS47.2] seeks the development of a design guide that supports and encourages universal accessible design principles for homes and recreational areas. The reasons given include that the current design of Pukerua Bay means access for people with limited mobility is restricted and that new developments must be more accessible for more people.
341. Waka Kotahi [OS81.9] seeks an integrated planning approach to support the zoning of the NGA as a whole package through the development of an overarching transport strategy to ensure land use is integrated in a manner that provides a safe and connected transport network, and achieves the government and regional transport goals of emissions and vehicle kilometres travelled (VKT) reductions. The reasons given include that coordination of urbanisation across the NGA as a whole is critical to contributing to a well-functioning urban environment and associated transport outcomes.

3.17.2 Assessment

342. In relation to the submission from the PBRA [OS47.2], I agree that use of a design guide addressing universal accessible design principles for homes and recreational areas by developers could have merit for improving the design of buildings and spaces within Porirua. I note that the internal design of buildings, including providing for people with disabilities is generally a matter covered by the Building Act 2004. However, the Auckland Design Manual provides a high-quality, easily accessible web-based guideline on universal design, including for residential dwellings. The guidance provided in the Auckland Design Manual on universal design is general in nature and equally applicable to development within Porirua. As such, I do not consider that a new design guide needs to be developed by PCC and incorporated in the PDP, as there is sufficient existing available guidance, and the matters generally sit outside of RMA considerations.
343. Similarly, I also agree with Waka Kotahi [OS81.7 and OS81.9] that an overarching transport strategy for the entire Northern Growth Area would be beneficial. As noted by Waka Kotahi, such a strategy could identify how development will be staged and how land use and transport will be integrated between each area. This could then influence any future development area chapters and associated structure plans for the Northern Growth Area. However, such a strategy would need to be developed under the Local Government Act 2002 and would sit outside the PDP.

3.17.3 Summary of recommendations

344. I recommend for the reasons given in the assessment, that the submissions from PBRA [OS47.2] and Waka Kotahi [OS81.7 and OS81.9] be **accepted in part**.
345. No amendments to the PDP are recommended as a result of these submissions.
346. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.18 Minor Errors

347. I recommend that an amendment be made to chapter to fix the phrasing of DEV-NG-P4-2 to include the word 'the'. This amendment could have been made after PDP was notified through the RMA process to correct minor errors⁸, but I recommend the amendment is made as part of the Hearing Panel's recommendations for completeness and clarity. The amendment is set out below.

⁸ Clause 16 of RMA Schedule 1

4 Conclusions

348. Submissions have been received in support of, and in opposition to the PDP and Variation 1. While most of these submissions relate to the DEV – NG – Northern Growth Development Area chapter as notified, some submissions seek that additional consideration be put into the requirements of the NPS-UD, recreational facilities, and educational facilities and demands generated by the development of the NGDA, along with the potential wider environmental effects of the development of the NGDA for urban purposes.
349. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that PDP should be amended as set out in Appendix A of this report.
350. For the reasons set out in the Section 32AA evaluation included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:
- Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives, and
 - Achieve the relevant objectives of the PDP, in respect to the proposed provisions.

Recommendations:

I recommend that:

1. The Hearing Commissioners accept, accept in part, or reject submissions (and associated further submissions) as outlined in Appendix B of this report; and
2. The PDP is amended in accordance with the changes recommended in Appendix A of this report.

Signed:

Name and Title		Signature
Report Author	Rory Smeaton Senior Policy Planner	

Appendix A. Recommended Amendments to DEV – NG – Northern Growth Development Area Chapter

Where I recommend changes in response to submissions, these are shown as follows:

- Text recommended to be added to the PDP is in red and underlined.
- Text recommended to be deleted from the PDP is in red and ~~struckthrough~~.

DEV - NG - Northern Growth Development Area

The Northern Growth Development Area has been identified as an area that is suitable for urban growth where this is in accordance with the Structure Plan developed for the area.

This chapter contains objectives, policies and rules which relate to the Development Area. The rules in this chapter apply in addition to the underlying zone rules and the rules contained in the Part 2: District-Wide Matters chapters. Where there is a conflict between the two sets of rules, the more restrictive activity status will apply.

The Development Area covers approximately 323 hectares of greenfield land to the south of Pukerua Bay. The key elements that define the Development Area as shown on the Structure Plan are:

- Identification of the areas zoned Medium Density Residential, Rural Lifestyle and Neighbourhood Centre;
- Identification of proposed Freshwater Management Areas;
- The protection of Significant Natural Areas and identification of ecological connections to be created between them;
- Identification of an indicative transport network including roads, bus routes and cycling/pedestrian tracks, and connections at Development Area boundaries; and
- Identification of reserves to serve the new community and the existing community of Pukerua Bay, including a neighbourhood community park and neighbourhood reserves.

Urban form

The way the Development Area is subdivided will introduce long-term development patterns and will therefore determine the quality and character of the area. Ensuring that subdivision is well-designed is therefore integral to achieving a well-functioning and high quality living environment for future residents. Inclusion of the structure plan within the District Plan will assist in achieving a well-functioning urban environment, and the Development Area provisions will ensure that the Structure Plan is implemented. Underlying zoning provisions and district-wide provisions will also help ensure that subdivision, use and development, including any associated earthworks, are appropriate.

Land use

The residential areas within the Development Area are zoned Medium Density Residential. This recognises the requirements of the NPS-UD and the Medium Density Residential Standards introduced through the RMA-EHS. A commercial area located within the Development Area near State Highway 59 is zoned Neighbourhood Centre, consistent with the hierarchy of commercial centres in Porirua. This area will provide services and amenities to meet the day-to-day needs of residents. The balance of the site remains Rural Lifestyle Zone.

Ecological values

There are areas of native vegetation within the Development Area which are Significant Natural Areas and are protected by the relevant Ecosystem and Indigenous Biodiversity provisions in the District Plan. The provisions seek to maintain and enhance these areas to ensure the integrity of the Significant Natural Areas on the site are not compromised through future development. The creation of new ecological connections between the Significant Natural Areas will also assist in enhancing these areas and indigenous biodiversity values across the Development Area.

Recreation areas

The Structure Plan identifies a network of neighbourhood parks that enable residents to easily access a park or reserve close to their home. The Structure Plan also identifies a neighbourhood community park next to the neighbourhood centre, which will provide a large recreational space with good accessibility from road and active transport networks that service both the Development Area and the wider Pukerua Bay urban area. Additionally, four indicative neighbourhood reserve areas are identified to provide amenity and day-to-day recreational opportunities for residents.

Freshwater Management Areas

The Freshwater Management Areas identify opportunities to maintain and enhance terrestrial and freshwater ecology and improve water quality. They can also provide for water sensitive design approaches to stormwater management including catchment scale detention devices; provide increased resilience to flood hazards; connect the community to water and provide for passive recreation, and; create high quality amenity for the community. Other activities may also need to locate or be undertaken within these areas to enable the wider development of the area, such as infrastructure or earthworks.⁹ The Freshwater Management Areas also acknowledge provisions that already apply to subdivision, use and development in these areas under the District Plan, Natural Resources Plan, NPS-FM and the NES-F.

Connectivity

To promote active and sustainable transport modes, and enhanced recreational experiences, indicative walking and cycling connections have been identified on the Structure Plan. The exact locations of these connections will need to be determined at subdivision stage and created through the development of the site. These also provide open space connectivity through providing linkages between Significant Natural Areas, recreation reserves and along waterways.

The Structure Plan provides indicative access locations, road layouts and bus routes. These have been identified primarily taking account of the topography of the Development Area, the location of water bodies and Significant Natural Areas, and the potential for longer-term connectivity to adjacent areas. The main connection of the internal road layout to the wider road network is via a new access onto State Highway 59.

Objectives**DEV-NG-01 Purpose of the Northern Growth Development Area**

The Northern Growth Development Area contributes to achieving feasible development capacity to meet Porirua City's medium to long-term housing needs.

DEV-NG-02 Planned urban built environment of the Northern Growth Development Area

Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:

1. A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan;
2. A built urban form that responds to the natural landform;
3. A quality living environment that is connected, accessible and safe;
4. A high quality public open space and recreation network that is easy to access and meets the needs of the local community;

⁹ Pukerua Property Group Limited [OS59.4]

5. Medium density housing with a variety of housing types, sizes and tenures;
6. A neighbourhood centre that serves the needs of the local community;
7. An urban form that is integrated with the transport network, and encourages **public and** active transport modes **while minimising reliance on private vehicles**¹⁰; and
8. Development that maintains and protects and, where possible, enhances ecological values,¹¹ and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments.

DEV-NG-O3 Provision of infrastructure

Infrastructure with sufficient capacity is provided at the time of subdivision for urban use and is developed in an integrated, efficient and comprehensive manner to meet the planned needs of the Northern Growth Development Area.

Policies

DEV-NG-P1 Use and development

Enable use and development that is in accordance with the Northern Growth Development Area Structure Plan.

DEV-NG-P2 Subdivision

Provide for subdivision that is in accordance with the Northern Growth Development Area Structure Plan, and where the design and layout of the subdivision:

1. Integrates the topographical, natural and physical characteristics, constraints and opportunities of the Development Area;
2. Minimises landscape and visual effects of development both within the site and on views of the site from transport corridors, the existing Pukerua Bay urban area, and Whenua Tapu cemetery, through:
 - a. Minimising earthworks and the modification of landform where practicable;
 - b. Integrating the transport network with the existing landform to the extent practicable;
 - c. Providing landscaping within road corridors;
 - d. Creating open space linkages and networks; and
 - e. Retaining existing indigenous vegetation;
3. Provides adequate and integrated infrastructure to service the needs of the development;
4. Provides a transport network layout and design that:
 - a. Is safe for all transport users;**
 - ab.** Recognises and provides for transport connections at the boundaries of the Development Area where opportunities exist;
 - bc.** Provides for roads shown as indicative bus routes as Collector Roads, and other roads as Access Roads;
 - cd.** Provides for **pedestrian active transport**¹² and open space connectivity, including by incorporating legal public access along indicative track routes identified on the Structure Plan, and providing for opportunities to create recreational and open space linkages;
5. Recognises and enhances ecological values of the Development Area, including by:
 - a. Creating buffer areas around the edges of Significant Natural Areas identified in SCHED7 – Significant Natural Areas; and
 - b. Creating ecological corridors in the locations identified on the Structure Plan which will, over time, become dominated by indigenous vegetation,

¹⁰ GWRC [OS74.63]

¹¹ QEII National Trust (QEII) [OS82.3]

¹² Waka Kotahi NZ Transport Agency [OS81.33]

- with a sufficient width, scale, and appropriate mitigation of any severance caused by roads, to connect and enhance Significant Natural Areas;
6. Minimises adverse effects on waterbodies;
 7. Minimises natural hazard risk to people's lives and properties;
 8. Demonstrates that use and development within the Freshwater Management Areas identified on the Structure Plan:
 - a. Considers regional plan provisions and the regulations in the NES-F;
 - b. Is consistent with Water Sensitive Urban Design principles and Wellington Water's 'Water Sensitive Design for Stormwater: Treatment Device Design Guideline' (Version 1.1, 2019) for the design of any relevant stormwater treatment devices;
 - c. Recognises and provides opportunities to enhance freshwater ecology, public access to and along freshwater bodies, and resilience to flood risk;
 9. Incorporates stormwater management measures for the treatment and disposal of stormwater at catchment and allotment scales, and achieve hydraulic neutrality;
 10. Provides parks, reserves, pathways and open space areas including a neighbourhood community park and neighbourhood parks, and gully and hilltop reserves where opportunities exist; and
 11. Minimises the potential for reverse sensitivity effects and other effects at the interface of different zones within the Development Area.

DEV-NG-P3 Potentially appropriate development

Only allow subdivision, use and development that is potentially not in accordance with the Northern Growth Development Area Structure Plan where it is demonstrated that it is appropriate for such subdivision, use or development to occur within the Development Area, having regard to whether:

2. The purpose and effects of the subdivision, use or development are likely to constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan, including consideration of:
 - a. The compatibility of the type, location and density of the development with the planned urban form of the Northern Growth Development Area;
 - b. The integration of topographical, natural and physical characteristics, constraints and opportunities;
 - c. Risks from natural hazards to people, property and the environment;
 - d. Maintaining and enhancing ecological values within and adjacent to¹³ the Development Area;
 - e. The need for adequate, coordinated and integrated infrastructure to meet the planned urban needs of the area;
 - f. Safe and Cconnected transport networks that allow ease of movement for all modes to, from and within the Development Area;¹⁴ and
 - g. Integrated and accessible open space networks and reserves;
3. The effects on the landscape and visual amenity from earthworks, the modification of landform, and the location and design of the transport network will be minimised;
4. It will compromise any cultural, spiritual and/or historical values, interests or associations of importance to Ngāti Toa Rangatira that are associated with the Northern Growth Development Area and if so, the outcomes of any consultation with Ngāti Toa Rangatira, in particular with respect to mitigation measures and/or the incorporation of mātauranga Māori principles into the design and development of the activity;
5. It would provide for or support the future needs of the Development Area;
6. Its scale, design and layout is compatible with the planned urban built environment of Development Area as it transitions and once urbanised as set out in the Structure Plan;

¹³ QEII [OS82.5]

¹⁴ Waka Kotahi [OS81.34]

7. Any adverse visual effects can be appropriately avoided, remedied or mitigated through screening, planting, building design, siting, and the retention of existing vegetation; and
8. Staging is appropriate to ensure development occurs logically and achieves good urban form.

DEV-NG-P4 Inappropriate development

Avoid subdivision, use or development that is not in accordance with the Northern Growth Development Area Structure Plan, where these:

1. Constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan;
2. Result in adverse effects on the planned urban built environment of [the](#)¹⁵ Development Area, which cannot be appropriately avoided, remedied or mitigated; or
3. Do not provide sufficient infrastructure to service its needs and/or constrain, limit or compromise the efficient provision of infrastructure to service the Structure Plan.

Rules

Note: There may be a number of provisions that apply to an activity, building, structure or site. Resource consent may therefore be required under rules in this chapter as well as other chapters. Unless specifically stated in a rule, resource consent is required under each relevant rule. The steps to determine the status of an activity are set out in the General Approach chapter.

Additional rules relating to subdivision, including minimum allotment sizes for each zone, are found in the Subdivision chapter.

DEV-NG-R1 Activities (excluding subdivision) that are permitted activities in the underlying zone**All zones**

1. Activity status: **Permitted**

Where:

- a. The activity is in accordance with DEV-NG-Figure 1 Northern Growth Development Area Structure Plan.

Note: The provisions of the relevant zone chapters also apply to any activities within the Northern Growth Development Area.

All zones

2. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with DEV-NG-R1.a.

Matters of discretion are restricted to:

1. The matters in DEV-NG-P3.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.

DEV-NG-R2 Earthworks that are permitted activities in the EW – Earthworks chapter**All zones**

1. Activity status: **Permitted**

¹⁵ Clause 16 minor amendment

	<p>Where:</p> <p>a. The activity is in accordance with DEV-NG-Figure 1 Northern Growth Development Area Structure Plan.</p> <p>Note: The provisions of the EW- Earthworks chapter also apply to any earthworks within the Northern Growth Development Area.</p>
All zones	<p>2. Activity status: Restricted discretionary</p> <p>Where:</p> <p>a. Compliance is not achieved with DEV-NG-R2.a.</p> <p>Matters of discretion are restricted to:</p> <p>1. The matters in DEV-NG-P3.</p> <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
DEV-NG-R3 Subdivision of land within the Northern Growth Development Area	
Medium Density Residential Zone	<p>1. Activity status: Controlled</p> <p>Where:</p> <p>a. The allotment is less than 3,000m² in area;</p> <p>b. Any subdivision of an allotment containing <u>or directly adjoining</u>¹⁶ a Significant Natural Area identified in SCHED7- Significant Natural Areas must include:</p> <ol style="list-style-type: none"> i. A scheme plan which identifies a buffer area of at least 5m wide around that part of the perimeter of the Significant Natural Area which is located within <u>or directly adjoining</u>¹⁷ the allotment; ii. A planting plan and monitoring and maintenance programme for the buffer area which meets the requirements set out in Parts B and C of Appendix 17 Ecological Corridors and SNA Buffer areas; and iii. Details of how the buffer area will be legally protected in perpetuity in accordance with Part A of Appendix 17 Ecological Corridors and SNA Buffer areas; <p>c. Any subdivision of an allotment which includes an ecological corridor identified on DEV-NG-Figure 1 Northern Growth Development Area Structure Plan must include:</p> <ol style="list-style-type: none"> i. A scheme plan which identifies the ecological corridor as being no less than 50 metres wide and connecting the Significant Natural Areas which it is located between; ii. A planting plan and monitoring and maintenance programme for the ecological corridor which meets the requirements set out in Parts B and C of Appendix 17 Ecological Corridors and SNA Buffer areas; and iii. Details of how the ecological corridor will be legally protected in perpetuity in accordance with Part A of Appendix 17 Ecological Corridors and SNA Buffer areas;

¹⁶ QEII [OS82.7]¹⁷ QEII [OS82.7]

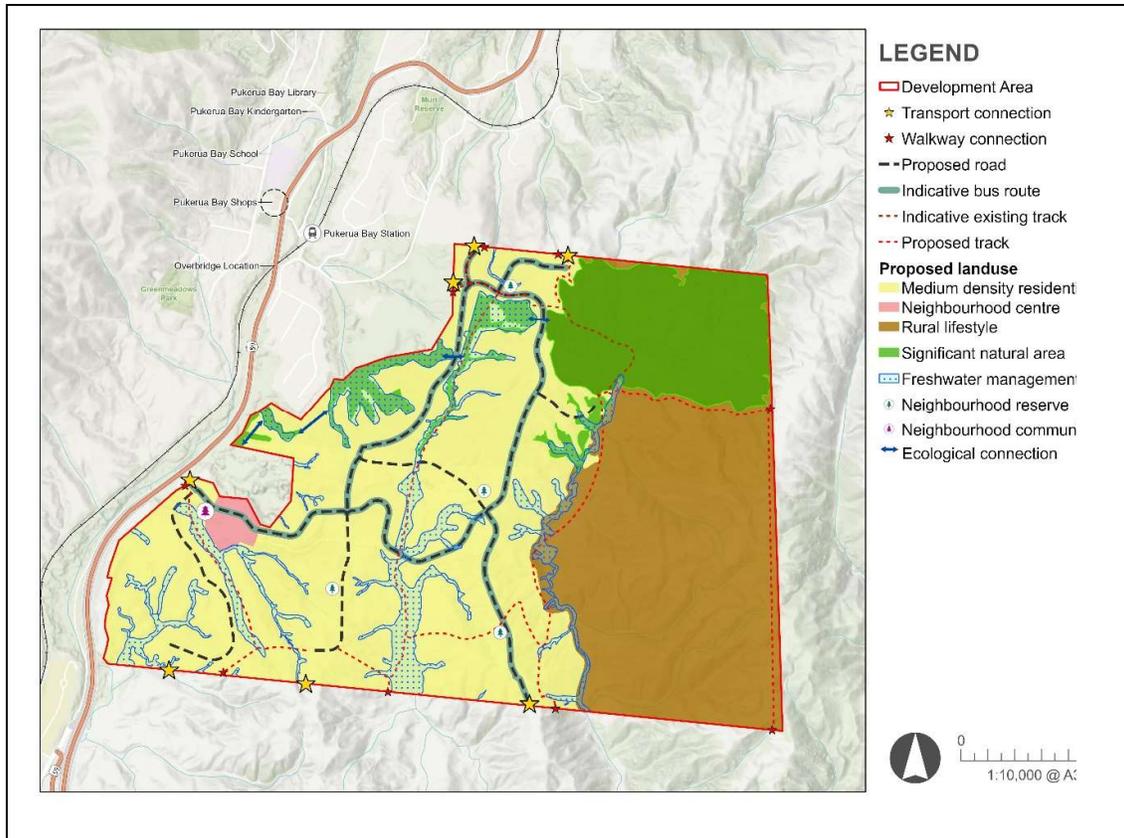
	<p>d. The design and layout of the subdivision is in accordance with DEV-NG-Figure 1 Northern Growth Development Area Structure Plan.</p> <p>Matters of control are limited to:</p> <ol style="list-style-type: none"> 1. The matters in DEV-NG-P2. <p>Note: The provisions of the SUB - Subdivision chapter also apply to any subdivision within the Northern Growth Development Area.</p>
<p>Medium Density Residential Zone</p>	<p>2. Activity status: Restricted discretionary</p> <p>Where:</p> <ol style="list-style-type: none"> a. The allotment is 3,000m² or greater in area; b. Any subdivision of an allotment containing <u>or directly adjoining</u>¹⁸ a Significant Natural Area identified in SCHED7- Significant Natural Areas must include: <ol style="list-style-type: none"> i. A scheme plan which identifies a buffer area of at least 5m wide around that part of the perimeter of the Significant Natural Area which is located within <u>or directly adjoining</u>¹⁹ the allotment; ii. A planting plan and monitoring and maintenance programme for the buffer area which meets the requirements set out in Parts B and C of Appendix 17 Ecological Corridors and SNA Buffer areas; and iii. Details of how the buffer area will be legally protected in perpetuity in accordance with Part A of Appendix 17 Ecological Corridors and SNA Buffer areas; c. Any subdivision of an allotment which includes an ecological corridor identified on DEV-NG-Figure 1 Northern Growth Development Area Structure Plan must include: <ol style="list-style-type: none"> i. A scheme plan which identifies the ecological corridor as being no less than 50 metres wide and connecting the Significant Natural Areas which it is located between; ii. A planting plan and monitoring and maintenance programme for the ecological corridor which meets the requirements set out in Parts B and C of Appendix 17 Ecological Corridors and SNA Buffer areas; and iii. Details of how the ecological corridor will be legally protected in perpetuity in accordance with Part A of Appendix 17 Ecological Corridors and SNA Buffer areas; d. The design and layout of the subdivision is in accordance with and gives effect to DEV-NG-Figure 1 Northern Growth Development Area Structure Plan. <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The matters in DEV-NG-P2.
<p>Rural Lifestyle Zone</p>	<p>3. Activity status: Restricted discretionary</p>

¹⁸ QEII [OS82.7]

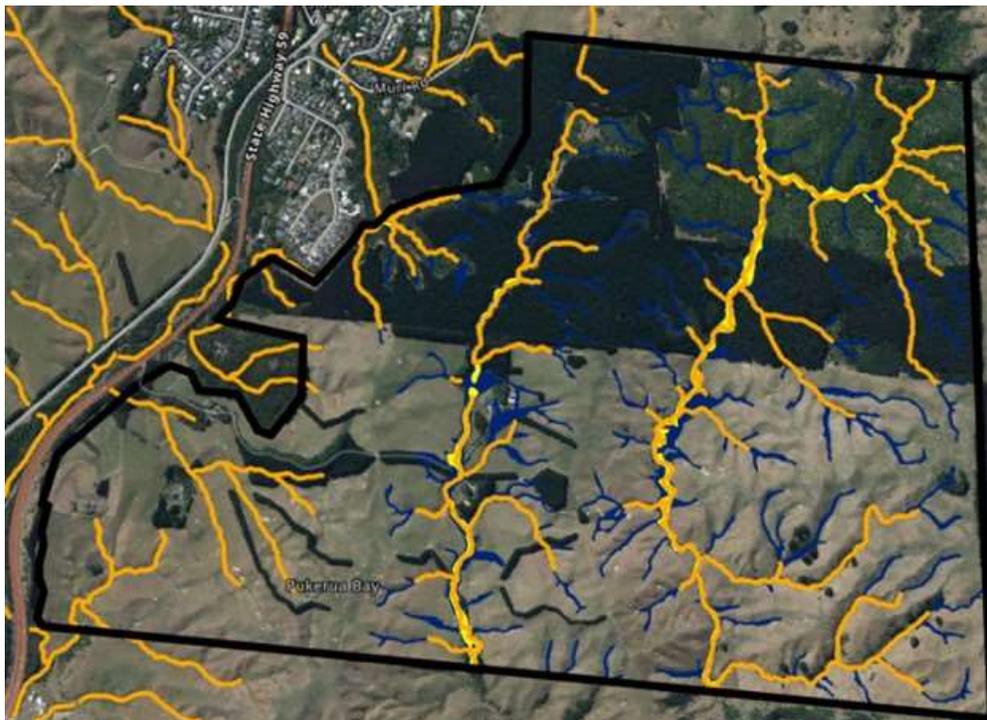
¹⁹ QEII [OS82.7]

	Neighborhood Centre Zone	<p>Where:</p> <ol style="list-style-type: none"> a. Any subdivision of an allotment containing <u>or directly adjoining</u>²⁰ a Significant Natural Area identified in SCHED7-Significant Natural Areas must include: <ol style="list-style-type: none"> a. A scheme plan which identifies a buffer area of at least 5m wide around that part of the perimeter of the Significant Natural Area which is located within <u>or directly adjoining</u>²¹ the allotment; b. A planting plan and monitoring and maintenance programme for the buffer area which meets the requirements set out in Parts B and C of Appendix 17 Ecological Corridors and SNA Buffer areas; and c. Details of how the buffer area will be legally protected in perpetuity in accordance with Part A of Appendix 17 Ecological Corridors and SNA Buffer areas; b. The design and layout of the subdivision is in accordance with and gives effect to DEV-NG-Figure 1 Northern Growth Development Area Structure Plan. <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The matters in DEV-NG-P2.
	All zones	<p>4. Activity status: Discretionary</p> <p>Where:</p> <ol style="list-style-type: none"> a. Compliance is not achieved with DEV-NG-R3-1.b, DEV-NG-R3-1.c or DEV-NG-R3-1.d; b. Compliance is not achieved with DEV-NG-R3-2.b, DEV-NG-R3-2.c or DEV-NG-R3-2.d; or c. Compliance is not achieved with DEV-NG-R3-3.
DEV-NG-R4		Activities that are not otherwise provided for in this table
	All zones	<p>1. Activity status: Restricted discretionary</p> <p>Where:</p> <ol style="list-style-type: none"> a. The activity is in accordance with DEV-NG-Figure 1 Northern Growth Development Area Structure Plan. <p>Matters of discretion are restricted to:</p> <ol style="list-style-type: none"> 1. The matters in DEV-NG-P3. <p>Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</p>
	All zones	<p>2. Activity status: Discretionary</p> <p>Where:</p> <ol style="list-style-type: none"> a. Compliance not achieved with DEV-NG-R4-1.a.
DEV-NG-Figure 1		Northern Growth Development Area Structure Plan

²⁰ QEII [OS82.7]²¹ QEII [OS82.7]



Flood Hazard overlays



Appendix B. Recommended Responses to Submissions and Further Submissions

The recommended responses to the submissions made on this topic are presented in Table B 1 below.

Table B 1: Recommended responses to submissions and further submissions on Variation 1 to the PDP

Note: Further submitter Leigh Subritzky (FS17) supported original submissions 1, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 18, 24, 25, 26, 29, 30, 31, 32, 33, 34, 35, 39, 40, 41, 42, 43, 44, 47, 48, 51, 52, 55, 58, 60, 61, 62, 63, 64, 65, 66, 68, 69, 70, 72, 73, 74, 77, 79, 80, 85, 86, 87, 88, 89, 90, 91, 97, 98, 99, 100, 102, 104, 105, 106, 107, 109, 110, 111, 114, 115, 116, and 117. Original submissions 2, 5, 19, 20, 21, 27, 28, 53, 54, 56, 67, 71, 75, 76, 78, 81, 82, 83, 84, 94, 95, 96, 101 and 113 were opposed by the further submitter. Due to size, these further submission points are not included in the table below.

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
General							
OS11.5 ²²	Paul Clegg	General	Require natural vegetation and waterways including constructed wetlands or other FMAs to make up 50 % of the development area.	3.2.1	Reject	See body of the report	No
OS27.1 ²³	Pukerua Holdings Limited	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Ko Simon Barber toku ingoa. I tipu ake ahau i Pukerua Bay. He tikanga motuhake enei puke ki ahau. Kei te harikoa ahau ki te whakapuaki i tenei waahi ki te katoa o te hapori. Extremely encouraged by the proactive engagement with Tangata Whenua and Ngati Toa Rangitira's willingness to build a collaborative approach to this development. Looks forward to further engagement throughout the consenting phase and as we enter the construction programme enabling the iwi's ongoing involvement.</i>	n/a	Accept	The engagement of landowners and developers with mana whenua is supported.	No
OS27.2 ²⁴	Pukerua Holdings Limited	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Owens of the Muri Road block, 128 hectares of the northernmost land holding of the Northern Growth Area Development Plan Change. Fully supports the proposed Plan Variation and the outcomes identified in providing for a Porirua city community that is expected to grow exponentially in the next 30 years by over 40%. [...]</i>	n/a	Accept	The support of the landowners is noted.	No
OS68.6 ²⁵	Friends of Taupo Swamp & Catchment Inc	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>If and when any development proceeds in the Northern Growth Area, we consider that both the intent and detail of these provisions must be closely adhered to, monitored and enforced.</i>	n/a	Accept	The monitoring and enforcement of the district plan is a function of Council.	No
OS59.2 ²⁶	Pukerua Property Group Limited	General	Opposes specific parts of the DEV-NG-Northern Growth Area chapter as set out in the track changed version of the chapter at Appendix 1 to the submission. [Refer to original submission for full decision requested]	n/a	Accept in part	Some amendments to the chapter have been recommended based on the submitter's more detailed submission points.	Yes

²² Supported by Alan Collett [FS99.14] and Rebecca Davis [FS127.5].

²³ Supported by Ron Lucas on Behalf of landowner SS Pointon [FS22.2].

²⁴ Supported by Ron Lucas on Behalf of landowner SS Pointon [FS22.3].

²⁵ Supported by Rebecca Davis [FS127.484].

²⁶ Opposed by Rebecca Davis [FS127.486].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS59.3 ²⁷	Pukerua Property Group Limited	General	Seeks amendments to DEV-NG-Northern Growth Area chapter of the PDP as shown in the tracked changed version of the chapter at Appendix 1 to the chapter.	n/a	Accept in part	Some amendments to the chapter have been recommended based on the submitter's more detailed submission points.	Yes
OS59.8 ²⁸	Pukerua Property Group Limited	General	Generally supports providing specific objectives, policies, rules and standards in the Northern Growth Area.	n/a	Accept	Accept in part, subject to amendments made in response to other submissions	No
OS99.2 ²⁹	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Questions:</i> <i>What investigations have been done to model intensification of existing urban areas and including zoning changes to allow medium density housing in those locations listed in [separate submission point]. The 2048 strategy promotes a compact liveable city. Establishing a new subdivision on the furthest and most remote northern boundary hardly sits in line with that statement;</i> <i>What cooperation has been carried out with the WCC regarding its northern boundary to explore intensification in those areas adjacent to the PCC catchment area that are well served by rail and other modes of transport; and</i> <i>Whether the PCC HBA delved into these possibilities.</i>	3.2.1	Reject	See body of the report	No
OS99.10	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Expresses concerns regarding:</i> <ul style="list-style-type: none"> • <i>Minutes from the Pukerua Bay residents' association meeting in February a PCC staff member is quoted as saying "several blocks to the south and east of Pukerua Bay are in the process of consent for residential development";</i> • <i>During the residents' association meeting on the 27th of April PCC staff openly said that the speed of which things were moving was due to the council having a "motivated developer";</i> • <i>Further questioning about the proposed area for development and its current carbon sequestration use revealed there had been a recent change of ownership to Barber Commercial Ltd;</i> • <i>Email correspondence with PCC staff has revealed that the PCC HBA is now being revised and will support this proposed variation; and</i> • <i>During the residents' association meeting on the 27th of April a PCC contractor revealed that there was an existing memorandum of understanding between Barber Commercial Ltd and the PCC.</i> 	3.2.1	Reject	See body of the report	No

²⁷ Opposed by Rebecca Davis [FS127.487].

²⁸ Opposed by Rebecca Davis [FS127.492].

²⁹ Supported by Alan Collett [FS99.392].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<i>States that it appears that the proposed variation is a 'fait accompli' and that no submissions from the existing residents will matter.</i>				
OS99.11	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Questions whether:</i> <ul style="list-style-type: none"> • Mayor Baker will make her past commercial/professional relationship with the owner of Barber Commercial known; • Mayor Baker has a commercial interest in this development; • The encouragement of urban sprawl just an initiative to increase the rates take for the PCC; • The MOU between the PCC and the developer will be made public and what it binds the PCC to. 	3.2.1	Reject	See body of the report	No
OS114.53 ³⁰	Te Rūnanga o Toa Rangatira	General	Whilst the expert advice mentions, the structure plan have considered these impacts and these concerns have informed the design of the Structure Plan; Structure Plan can only convey the theoretical aspects of these concerns. In reality, because of the unknowns and the scale of the works and their complexity, in the absence of detailed risk analysis, Te Rūnanga cannot be sure how these can be balanced against the construction and the works. Te Rūnanga would like further research and work to be done. [Refer to reason for submission - in relation to tipping points for ecological systems]	3.2.1	Reject	See body of the report	No
Environmental Protection							
OS79.13 ³¹	Plimmerton Residents' Association	General	Seeks that environmental protection for the Taupō Swamp and catchment (similar to that provided for Plimmerton Farm Zone under PC18) be applied to the Northern Growth Development Area.	3.2.2	Accept in part	See body of report	No
OS82.1 ³²	QEII National Trust (QEII)	General	Seeks adequate protections to be in place to ensure that increased housing supply and intensification in the district is undertaken within the ecological capacity of the area, and that the open space values and natural environment that make Porirua so special are safeguarded for future generations.	3.2.2	Accept in part	See body of report	No
OS108.2	Yvonne Fletcher	General	That run-off and potential silting from NGA are strictly managed to avoid damage and risks to existing communities and environments at Plimmerton/Hongoeka, Pukerua Bay and Pāuatahanui Inlet.	3.2.2	Accept in part	See body of report	No
OS99.8	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Suggests that PCC put resource consent requirements on the developer to mitigate the destruction of such a large forestry block such as entering into negotiations with the existing residents of Gray Street and Pukemere Way to discuss the feasibility of a 'green belt' which could include the preservation of identified significant ecological areas, preserve some forestry for the existing bird</i>	3.2.2	Reject	See body of report	No

³⁰ Supported by Rebecca Davis [FS127.444]

³¹ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.92] and Rebecca Davis [FS127.378].

³² Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.91] and Rebecca Davis [FS127.383].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<i>life that is flourishing in the area and go some way to minimise the 'detraction of amenity values existing residents appreciate' as referred to in policy 6(b)(i) of the NPSUD.</i>				
OS114.51 ³³	Te Rūnanga o Toa Rangatira	General	With this in mind [refer to reason for submission], Te Rūnanga notes that the NGA is at a scale and at a place (most land is on more than 12% gradient land and rarely a flat site) proposed, where this will also be a case. This prospect makes Te Rūnanga comprehend the impacts on Taiao. They are conscious of the consequences a bit more instead of what is doable, and it makes Te Rūnanga think what the scale of impact on several components of Taiao would be, as there is no way of measuring these impacts in an accurate way at the moment. Suggests these concerns should be looked at a larger scale not at the project level.	3.2.2	Accept in part	See body of report	No
Climate Change and Natural Hazards							
OS47.6	Pukerua Bay Residents Association	General	PCC should prioritise modelling if natural hazards across the whole site and the identification of adaptation required to changing risks from climate change impacts before development of the site.	3.2.3	Accept in part	See body of report	No
OS74.32	Greater Wellington Regional Council	General	Include policies and rules for any greenfield development areas that require the development to include actions and initiatives that improve climate resilience.	3.2.3	Accept in part	See body of report	No
OS99.7	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Objective 8 of the NPSUD speaks to supporting reductions in greenhouse gas emissions and the future effects of climate change. Questions whether the irony is not lost on PCC that a forest planted for carbon sequestration is to be uprooted to make way for this development.</i>	3.2.3	Reject	See body of report	No
OS108.1	Yvonne Fletcher	General	That recent extreme rain events causing SH59 closure (and any other issues) are considered against present knowledge of NGA hydrology.	3.2.3	Accept in part	See body of report	No
NPS-UD							
OS99.1 ³⁴	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>PCC literature in relation to the NGDA states that this variation is required to meet the council's obligations under the NPS-UD. The PCC 'Porirua Growth Strategy 2048' states that potentially 10,500 new homes will be required to accommodate projected population growth. This document identifies several residential zones and their potential dwellings: [Growth figures provided] The current plans and existing urban zones go a long way to satisfying the projected housing needs over the next 30 years. The reference to extending urban boundaries to the east to encompass the land from Lanes Flat to Kenepuru and east of Waitangirua and Cannons Creek to the newly opened State Highway 1. A substantial area which would yield a considerable number of dwellings. The 2048 strategy states the development of both Stebbings and Lincolnshire farms are under the WCC catchment but are close to Porirua geographically will yield 2600 more homes and will naturally soak up some of the PCC projected population growth.</i>	3.2.4	Reject	See body of report	No

³³ Supported by Rebecca Davis [FS127.442].

³⁴ Supported by Rebecca Davis [FS127.382].

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<i>Questions where the housing demand is for the change in zoning. When questioned at the Pukerua Bay residents' association meeting on the 27th of April all council staff could respond with when questioned "why the sudden need/change" was that they now have a motivated developer. Objective 3(c) of the NPSUD refers to high demand for housing. Nowhere in the literature read does it state that a "motivated developer" is reason enough to push through zoning changes.</i>				
OS99.3	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Objective 2 of the NPSUD requires that planning decisions improve housing affordability. Questions how the proposed change intends to achieve that. The Northern Ward is the most expensive area within the PCC catchment. The PCC HBA outlines house price to cost ratios and states that house prices are mainly driven by land costs in Porirua. Disagrees, and states that in today's climate this ratio has severely shifted below 1:5 and that construction costs are now the dominating factor. Any land costs within New Zealand are usually inflated by the slow parcel release tactics of developers to main a high demand as evidenced in developments such as Churton Park. Questions how the proposed new houses achieve objective 2 of the NPSUD.</i>	3.2.4	Reject	See body of report	No
OS99.4	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Questions whether PCC has considered its ability, as provided by policy 4 of the NPSUD, to modify its requirements under policy 3 of the NPSUD in that density requirements are only applied to the extent necessary to ensure accommodation of one or more of the following qualifying matters: a. Area being subject to a designation or heritage order given Pukerua Bay has significant Māori history. b. Matters necessary to implement, or ensure consistency with, iwi participation. Questions whether Ngati Toa been consulted and involved as per policy 9(c). c. This area is inappropriate for medium density housing given its remoteness within the PCC catchment, vulnerability to isolation and limited public transport.</i>	3.2.4	Reject	See body of report	No
OS99.9	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>A new subdivision established at the city margins will only exacerbate urban sprawl and do little to ease the cost of housing. The true cost of housing in New Zealand lies in the construction costs, especially materials, and current legislation does nothing to address this. What is being proposed by the NPSUD is flawed and invasive on the New Zealand way of life, nor will it achieve the environmental balances it aspires to as developers will only have profit at the forefront of their minds.</i>	3.2.4	Reject	See body of report	No
RPS Plan Change 1							
OS74.59	Greater Wellington Regional Council	General	Ensure the Development Area provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics, having regard to Proposed RPS Change 1 policies 55 and UD.3 as required. This includes ensuring that potential adverse effects of greenfield development are mitigated appropriately, occur within contaminant limits set by Greater Wellington as required by	3.2.5	Reject	See body of report	No

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			the NPS-FM, and can comply with conditions on relevant discharge consents held by Wellington Water				
Cultural Landscape Values							
OS114.52 ³⁵	Te Rūnanga o Toa Rangatira	General	Assess landscape values as they also connect to Cultural Landscape Values. Were these values properly mapped? Have they been excluded from the Structure Plan as ringfencing the greenfield development land? It is hard to imagine the visual impacts of these proposals will be less than minor and can be addressed in the appropriate way.	3.2.6	Reject	See body of report	No
FS74.175	Greater Wellington Regional Council		<p><i>Greater Wellington seek identification of cultural and spiritual landscape values and provisions to manage any adverse effects on those values.</i></p> <p><i>Reasons:</i></p> <p><i>Greater Wellington acknowledge the strategic objectives provide for the cultural and spiritual values of Ngāti Toa Rangatira, however these do not appear to have supporting policies aside from those that manage sites and areas of significance to Māori. Greater Wellington consider a landscape assessment which considers the cultural and spiritual values of Ngāti Toa Rangatira is required, and provisions included to manage adverse effects on those values.</i></p>				
Non-RMA matters							
OS55.1	Judith Frost-Evans and Gay Hay	General	Predator Free status of the Northern Growth Development Area Create a new guideline.	3.3	Reject	See body of report	No
OS55.2	Judith Frost-Evans and Gay Hay	General	Dog Control Traffic Control Pest Control. Create a new guideline.	3.3	Reject	See body of report	No
OS55.5	Judith Frost-Evans and Gay Hay	General	Every effort must be made to ensure invasive weeds aren't allowed to spread into the new development and a plan to encourage appropriate native plants on private property must be included. Create a new guideline.	3.3	Reject	See body of report	No
Education Facilities							
OS92.1 ³⁶	Ministry of Education	DEV-NG-O2	<p>DEV-NG-O2- Planned urban built environment of the Northern Growth Development Area</p> <p>Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:</p> <p>3. A quality living environment that is connected, accessible, safe, reliable and, <u>and is connected to educational facilities.</u></p> <p>9. An urban environment which is supported by educational facilities to meet the needs of the <u>local community</u></p>	3.4	Reject	See body of report	No
OS92.2	Ministry of Education	DEV-NG-P2	<p>DEV-NG-P2- Subdivision</p> <p>4. Provides a transport network layout and design that:</p>	3.4	Reject	See body of report	No

³⁵ Supported by Rebecca Davis [FS127.443]

³⁶ Supported by Rebecca Davis [FS127.450]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			c. Provides for pedestrian and open space connectivity, <u>including</u> by incorporating legal public access along indicative track routes identified on the Structure Plan, <u>including to existing or planned educational facilities</u> and providing for opportunities to create recreational and open space linkages;				
OS92.3	Ministry of Education	DEV-NG-P3	DEV-NG-P3- Potentially appropriate development Only allow subdivision, use and development that is potentially not in accordance with the Northern Growth Development Area Structure Plan where it is demonstrated that it is appropriate for such subdivision, use or development to occur within the Development Area, having regard to whether: 1. The purpose and effects of the subdivision, use or development are likely to constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan, including consideration of: f. Connected transport networks that allow ease of movement to, from and within the Development Area, <u>including to existing and planned educational facilities.</u> h. <u>There is a need to provide educational facilities which support the local community.</u>	3.4	Reject	See body of report	No
OS92.4	Ministry of Education	DEV-NG-P4	DEV-NG-P4 Avoid subdivision, use or development that is not in accordance with the Northern Growth Development Area Structure Plan, where these: 3. Do not provide sufficient infrastructure to service its needs, <u>including not providing for educational facilities</u> and/or constrain, limit or compromise the efficient provision of infrastructure, to service the Structure Plan.	3.4	Reject	See body of report	No
OS111.1 ³⁷	Pukerua Bay School BOT		That this development and variation pre-plans with the Ministry of Education to either bolster the infrastructure of Pukerua Bay School to ensure the buildings and space can handle the increasing numbers of children into the area, while still maintaining the open field environment for the benefit of the children and teachers at the school, and community. And Or Get confirmation from the Ministry of Education of a new school in the area and robust plans and timeframes for this to occur.	3.4	Reject	See body of report	No
OS111.2 ³⁸	Pukerua Bay School BOT		That this development and variation includes land allocated to the future building of a community hall which caters for a range of indoor sports, and also a plan to build a 25m covered swimming pool.	3.4	Reject	See body of report	No
OS111.3 ³⁹	Pukerua Bay School BOT		That land is also allocated to an open field area that can cater for football and rugby.	3.4	Reject	See body of report	No

³⁷ Supported by Rebecca Davis [FS127.495]

³⁸ Supported by Rebecca Davis [FS127.496]

³⁹ Supported by Rebecca Davis [FS127.497]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS111.6 ⁴⁰	Pukerua Bay School BOT		[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>This development proposal and associated District Plan and Structure Plan present several significant concerns to the future of Pukerua Bay School. The school understands the likelihood of significant disruption to the community and School during and following the development and a significant change to the feel and operation of the community and the school.</i> <i>As a school, they realise that more intensive housing development is a government imperative and that they have no other option than to embrace it. Some of their community want things to remain unchanged, others see the potential for improvements to school infrastructure, recreation facilities and services for children, and for safer and more robust access from a child's home to the school.</i> <i>Approach to submission is to both identify points where suitable or stronger protections can be built into the plans, and to suggest changes or additions that would improve the quality of community infrastructure, access and flow of children and families to and from Pukerua Bay School, and ultimately better educational outcomes for tamariki.</i>	3.4	Accept in part	See body of report	No
Significant Natural Areas							
OS11.2 ⁴¹	Paul Clegg	General	Retain provisions to maintain and enhance Significant Natural Areas	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
OS11.4 ⁴²	Paul Clegg	General	Strengthen requirements to create buffer areas around SNAs and create ecological connections so that these become non-negotiable.	3.5	Reject	See body of report	No
OS82.5 ⁴³	QEII National Trust (QEII)	DEV-NG-P3	[...] d. Maintaining and enhancing ecological values within <u>and adjacent to</u> the Development Area;	3.13.2	Accept	Agree with the submitter.	Yes
OS47.14	Pukerua Bay Residents Association	DEV-NG-R3	Add the following two new sections to this clause: iv. Ecological corridors and SNA buffer areas to incorporate open space linkages to provide contiguous public access around all their margins for recreation and maintenance; v. Buffer areas around wetlands are designed to prevent excessing runoff into the wetland;	3.5	Reject	See body of the report	No
OS47.15	Pukerua Bay Residents Association	DEV-NG-R3	In relation to DEV-NG-R3-1-c(i) and DEV-NG-R3-2-c(ii), clarify the wording '50m wide'.	3.5	Reject	See body of the report	No
OS82.7 ⁴⁴	QEII National Trust (QEII)	DEV-NG-R3	1 and 2.... b. Any subdivision of an allotment containing <u>or adjacent to</u> a Significant Natural Area identified in SCHED7 - Significant Natural Areas, or must include: i. A scheme plan which identifies a buffer area of at least 5 m wide around that part of the perimeter of the Significant Natural Area that is located within <u>or adjacent to</u> the allotment; ii. A planting plan and monitoring and maintenance programme for the buffer area which meets	3.5	Accept in part	See body of the report	Yes

⁴⁰ Supported by Rebecca Davis [FS127.500]

⁴¹ Supported by Alan Collett [FS99.17] and Rebecca Davis [FS127.2]

⁴² Supported by Alan Collett [FS99.15] and Rebecca Davis [FS127.4]

⁴³ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.96], GWRC [FS74.161] and Rebecca Davis [FS127.387]

⁴⁴ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.98], GWRC [FS74.162] and Rebecca Davis [FS127.389]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			the requirements set out in Parts B and C of APP17 - Ecological Corridors and SNA Buffer Areas; and i. Details of how the buffer area will be legally protected in perpetuity in accordance with Part A of APP17 - Ecological Corridors and SNA Buffer Areas;				
Freshwater Management Areas							
OS11.3 ⁴⁵	Paul Clegg	General	Retain provisions relating to Freshwater Management Areas.	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
Infrastructure							
General Infrastructure							
OS55.4	Judith Frost-Evans and Gay Hay	General	We request that infrastructure upgrades are identified and prioritized. Create a new guideline.	3.6.1	Accept in part	See body of the report	No
OS79.8 ⁴⁶	Plimmerton Residents' Association	General	Seeks that PCC be proactive with central government and, as relevant, Kāinga Ora, in seeking caveats on significant development that ensure provision for increased / improved infrastructure is planned alongside any such development.	3.6.1	Accept in part	See body of the report	No
OS79.15 ⁴⁷	Plimmerton Residents' Association	General	PCC to look broadly at the overall impacts of both in-fill and greenfields intensification on existing services and facilities, for example, transport planning in line with population growth, infrastructure renewal and development, access to local business areas, provision of schools and recreation areas, and protection for the environment.	3.6.1	Accept in part	See body of the report	No
OS99.6	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Questions whether PCC is sufficiently satisfied there will be the necessary infrastructure to support such an increase in housing within Pukerua Bay. If so, please provide evidence of this as your current structure plan lacks detail.</i> <i>Questions:</i> <ul style="list-style-type: none"> • <i>The stormwater mitigations to be put in place;</i> • <i>Allowances for increases in sewerage capacity;</i> • <i>Preservation of waterways and catchments areas;</i> • <i>Preservation of indicated mixed indigenous ecological areas as per the map on page 3 of your information boards as identified by your own staff/contractors;</i> • <i>The proposals for the 'local centre', including business/employment opportunities will it provide, and whether it will meet the obligations of objective 3 (a) of the NPSUD.</i> <i>The lack of detail available to existing residents is unacceptable, and it is hard to submit on such a proposal with out it.</i>	3.6.1	Reject	See body of report	No
OS47.13	Pukerua Bay Residents Association	DEV-NG-P4	PCC does not issue resource consents for the developments allowed by the DP variation until funding for the extra infrastructure is identified.	3.6.1	Reject	See body of the report	No
Transport Infrastructure							

⁴⁵ Supported by Alan Collett [FS99.16] and Rebecca Davis [FS127.3]

⁴⁶ Supported by Rebecca Davis [FS127.373]

⁴⁷ Supported by Rebecca Davis [FS127.380]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS47.4 ⁴⁸	Pukerua Bay Residents Association	Connectivity	Ensure that people living in houses across the whole development are within a safe and reasonable walking distance of public transport, whether that be buses (which would require one or more new bus routes being created) or train stations.	3.6.2	Accept in part	See body of the report	No
OS47.17	Pukerua Bay Residents Association	General	2. Ensure the connection to SH59 includes a safe crossing for pedestrians and cyclists over the state highway to allow non-car access to train stations to the south. Investigate the feasibility of building another train station around Airlie Rd to provide more convenient access to public transport to reduce the increase in traffic heading south on the state highway.	3.6.2	Accept in part	See body of the report	No
OS47.18	Pukerua Bay Residents Association	General	The concerns of safety and convenience to residents along most of the length of Muri Road, and many other recreational users of the road must be noted and be part of PCC's consideration of resource consent applications for Stage 1 and subsequent stages of the development.	3.6.2	Accept in part	See body of the report	No
OS47.19	Pukerua Bay Residents Association	General	PCC needs to work with other agencies and the developers to adequately support the stages of development to mitigate the impacts of development, particularly on access to public transport and movement into, around and out of the new communities, and to allow progressive access to these forms of movement as the new community is developed.	3.6.2	Accept in part	See body of the report	No
OS55.3	Judith Frost-Evans and Gay Hay	General	Few cars, less reliance on cars. Create a new guideline.	3.6.2	Accept in part	See body of the report	No
OS90.1	Guy Marriage	General	Need a route over SH59 to the other side of the road and the provision of a new rail station midway between Pukerua and Plimmerton.	3.6.2	Accept in part	See body of the report	No
OS11.6 ⁴⁹	Paul Clegg	General	Add a requirement that no development is undertaken until the new access to SH 59 is in place.	3.6.2	Reject	See body of the report	No
OS11.7 ⁵⁰	Paul Clegg	General	Add a requirement that residents must be consulted about any planned upgrades to Muri Road to enable safe access to the north of the site.	3.6.2	Reject	See body of the report	No
OS99.5	Alan Collett	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Objective 3 (b) of the NPSUD requires the area to be well serviced by existing or planned public transport. Questions how PCC intends to meet these criteria. The current Pukerua Bay rail station is limited in its capacity, it is often out of service and bus replacements are required. There are no park and ride facilities nor is there any land area to provide one. The proposed urban area is not within walking distance of this station especially for those with young families or the elderly or in severe weather.</i>	3.6.2	Reject	See body of the report	No
Stormwater Infrastructure							
OS114.54 ⁵¹	Te Rūnanga o Toa Rangatira	General	A detailed stormwater management plan is required to explain how tangibly stormwater will be managed.	3.6.3	Reject	See body of the report	No
OS114.55 ⁵²	Te Rūnanga o Toa Rangatira	General	[Not specified, refer to original submission]	3.6.3	Reject	See body of the report	No

⁴⁸ Supported by Rebecca Davis [FS127.448]

⁴⁹ Supported by Rebecca Davis [FS127.6]

⁵⁰ Supported by Rebecca Davis [FS127.7]

⁵¹ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.102] and Rebecca Davis [FS127.445]

⁵² Supported by Rebecca Davis [FS127.446, FS127.503 and FS127.504]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<p>While no specific decision sought, the submitter raised the following matter(s):</p> <p><i>Regulatory Setting: The proposed changes to the Regional Policy Statement will be stricter in that just providing water sensitive urban design won't itself be indicative of adequate stormwater management; given that WSUD is limited in high gradient and low permeable land, this leaves a more stringent approach regarding Te Rūnanga whaitua recommendations and its implementation in the Proposed Natural Resources Plan (PNRP).</i></p> <p><i>Te Rūnanga consider objectives, policies, and rules that will come out of PNRP process to be more stringent on the stormwater management and water quality measures. Regarding further regulatory context, such as the PCC Notified Plan, in the absence of a detailed environmental and stormwater management plan, it is challenging to understand how NE-O3 and NE-O4 and THWT-O1 will be achieved.</i></p>				
Commercial Zone							
OS47.16	Pukerua Bay Residents Association	General	Reconsider the Boffa Miskell suggestion to move the commercial centre away from the QE2 protected area near the entrance from SH59. This would depend on suitable flat land, and whether it could still be close to the community park, which would be essential.	3.7	Reject	See body of the report	No
OS76.355 ⁵³	Kāinga Ora - Homes and Communities	General	Support the Northern Growth Development Area with amendments: Seek the Neighbourhood Centre is up-zoned to a Local Centre	3.7	Reject	See body of the report	No
Residential Intensification Precinct							
OS76.356 ⁵⁴	Kāinga Ora - Homes and Communities	General	Support the Northern Growth Development Area with amendments: Apply Medium Density Residential Zone and Residential Intensification Precinct within a walkable catchment of the centre.	3.8	Reject	See body of the report	No
'Consistent' versus 'in accordance' with the Structure Plan							
OS59.7 ⁵⁵	Pukerua Property Group Limited	DEV-NG-R1	[...] Where: a. The activity is in accordance <u>consistent</u> with DEV-NG-Figure 1: Northern Growth Development Area Structure Plan.	3.9	Reject	See body of the report	No
OS59.9 ⁵⁶	Pukerua Property Group Limited	DEV-NG-R2	[...] Where: a. The activity is in accordance <u>consistent</u> with DEV-NG-Figure 1: Northern Growth Development Area Structure Plan.	3.9	Reject	See body of the report	No
OS59.10 ⁵⁷	Pukerua Property Group Limited	DEV-NG-R3	[...] 1. Activity status: Controlled [...] d. The design and layout of the subdivision is in accordance <u>consistent</u> with DEV-NG-Figure 1: Northern Growth Development Area Structure Plan. [...]	3.9	Reject	See body of the report	No

⁵³ Opposed by Alan Collett [FS99.388] and Rebecca Davis [FS127.362]

⁵⁴ Opposed by Alan Collett [FS99.389] and Rebecca Davis [FS127.363]

⁵⁵ Opposed by Rebecca Davis [FS127.491]

⁵⁶ Opposed by Rebecca Davis [FS127.493]

⁵⁷ Opposed by Rebecca Davis [FS127.494]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<p>2. Activity status: Restricted discretionary [...]</p> <p>d. The design and layout of the subdivision is in accordance <u>consistent</u> with DEV-NG-Figure 1: Northern Growth Development Area Structure Plan. [...]</p> <p>4. Activity status: Discretionary [...]</p> <p>c. Compliance is not achieved with DEV-NG-R3-3. € Notification: An application under this rule is <u>precluded from being publicly notified in accordance with section 95A of the RMA.</u></p>				
Introduction							
OS47.1	Pukerua Bay Residents Association	Urban Form	<p>In relation to Introductory principles; Urban form, add the following wording to the principle:</p> <p>Urban form The way the Development Area is subdivided will introduce long-term development patterns and will therefore determine the quality and character of the area. Ensuring that subdivision is well-designed is therefore integral to achieving a well-functioning and high quality living environment for future residents. <u>There will be a range of dwelling styles and sizes to ensure availability and affordability for a wide variety of household sizes and stages of life to account for the projected increase in the older population.</u> Inclusion of the structure plan within the District Plan will assist in achieving a well-functioning urban environment, and the Development Area provisions will ensure that the Structure Plan is implemented. Underlying zoning provisions and district-wide provisions will also help ensure that subdivision, use and development, including any associated earthworks, are appropriate. <u>Universal accessible design principles are incorporated into the subdivision to make the whole community, including recreational spaces and facilities, accessible to people with disabilities and of different ages, from the very young to the very old.</u></p>	3.11	Reject	See body of the report	No
OS47.3	Pukerua Bay Residents Association	Recreation areas	<p>Add the following wording:</p> <p>The Structure Plan identifies a network of neighbourhood parks that enable residents to easily access a park or reserve close to their home. The Structure Plan also identifies a neighbourhood community park, <u>including the potential for sports field(s) next to the neighbourhood centre, which will provide a large recreational space with good accessibility from road and active transport networks that service both the Development Area and the wider Pukerua Bay urban area. Additionally, four indicative neighbourhood reserve areas are identified to provide amenity and day-to-day recreational opportunities for residents. There will also be provision for street-level open spaces as informal gathering places for neighbours.</u></p>	3.11	Reject	See body of the report	No
OS47.5	Pukerua Bay Residents Association	General	<p>Add a new section to introductory principles as follows:</p> <p>Climate change and resilience The development will incorporate design principles that anticipate the effects of climate change, both to mitigate its impacts and to avoid contributing to it. Landform, infrastructure, urban design, water runoff, and placement of structures will anticipate an increase in extreme weather events and be designed to minimise the impacts of these events</p>	3.11	Reject	See body of the report	No

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			and other natural hazards, and to increase community resilience. Transport design and connectivity will seek to minimise the reliance on private motor vehicles for personal transport and maximise use of and access to public transport and carbon-neutral, active transport modes, such as cycling. Interpretation of rules around development must be in line with the Council's Climate Change Strategy.				
FS74.93	GWRC		<i>Greater Wellington seek a new principle for climate change and resilience is included in the introduction to the Northern Growth Development Area Chapter.</i>				
OS59.4 ⁵⁸	Pukerua Property Group Limited	Freshwater Management Areas	[...] <u>FMA's can accommodate uses compatible with urban activities including infrastructure, earthworks and amenity features.</u>	3.11	Accept in part	See body of the report	Yes
OS81.30	Waka Kotahi NZ Transport Agency	Connectivity	Retain as notified.	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
Objectives							
OS82.2 ⁵⁹	QEII National Trust (QEII)	DEV-NG-01	The Northern Growth Development Area contributes to achieving feasible development capacity to meet Porirua City's medium to long-term housing needs, <u>while balancing the environmental, cultural, and recreational values in the area.</u>	3.12.1	Reject	See body of the report	No
OS32.24 ⁶⁰	Harbour Trust & Guardians of Pāuatahanui Inlet	DEV-NG-02	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>This area encompasses a sensitive environment where any development risks causing adverse and irreversible effects on two large and sensitive ecosystems: The Taupo Swamp and its contributing catchments and the Pauatahanui Inlet via the higher land that drains east, principally into the Kakaho catchment. Any development in this area must be carefully managed to avoid risking adverse effects from sediment, contaminants and nutrients from entering these water bodies and eventually Te Awarua-o-Porirua. In particular, earthworks and related construction cause high levels of risk and must be closely managed and monitored.</i> <i>Strongly support the provision in DEV-NG-02-8.</i>	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
OS47.7 ⁶¹	Pukerua Bay Residents Association	DEV-NG-02	Add as point 7: 7. Community facilities designed for multiple uses by the whole community, and which are designed to create and build social cohesion;	3.12.2	Reject	See body of the report	No
OS47.8	Pukerua Bay Residents Association	DEV-NG-02	Amend 9:	3.12.2	Reject	See body of the report	No

⁵⁸ Opposed by Rebecca Davis [FS127.488]

⁵⁹ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.93] and Rebecca Davis [FS127.384]

⁶⁰ Supported by Rebecca Davis [FS127.475]

⁶¹ Supported by Rebecca Davis [FS127.449]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			Development that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of <u>on-site freshwater management areas and receiving waterbodies</u> including Te Awarua-O-Porirua Harbour and other downstream catchments.				
OS55.6	Judith Frost-Evans and Gay Hay	DEV-NG-O2	Qualify what a 'well-functioning urban environment consistent with...' means in relation to point 1.	3.12.2	Reject	See body of the report	No
OS55.7	Judith Frost-Evans and Gay Hay	DEV-NG-O2	Qualify what a 'quality living environment that is connected, accessible and safe' means in relation to point 3.	3.12.2	Reject	See body of the report	No
OS55.8	Judith Frost-Evans and Gay Hay	DEV-NG-O2	Clarify what ecological values are to be maintained and protected in relation to point 8.	3.12.2	Reject	See body of the report	No
OS59.5 ⁶²	Pukerua Property Group Limited	DEV-NG-O2	[...] <u>Housing (including medium density housing)</u> with a variety of housing types, sizes and tenures;	3.12.2	Reject	See body of the report	No
OS68.4 ⁶³	Friends of Taupo Swamp & Catchment Inc	DEV-NG-O2	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>The Taupō Swamp and its contributing catchments lie at the heart of this area of proposed development. Concerned as to how such a sensitive environment might be at risk of any development causing adverse effects on its ecosystems and water quality. Careful management of any development must take account of the risk from sediment, contaminants and nutrients entering the catchment, the Taupō Stream and its wetlands, and eventually out to Porirua Harbour. Concerned over the management and monitoring of earthworks at every stage of any development in the catchment. Recent high rainfall events for instance, have left very visible scars on the hills east of Highway 59 – site of the Proposed Plimmerton Farm development. Strongly supports the statement in point 6, PHAACT/ GOPI submission: The provision in DEV NG O2, 8, that says: "Development that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving waterbodies including Te Awarua-OPorirua Harbour and other downstream catchments."</i>	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
OS74.63	Greater Wellington Regional Council	DEV-NG-O2	Amend DEV-NG-O2(7) to also clarify that new subdivision, use and development must minimise reliance on private vehicles.	3.12.2	Accept in part	See body of the report	Yes
OS74.68	Greater Wellington Regional Council	DEV-NG-O2	Retain as notified.	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
OS81.31 ⁶⁴	Waka Kotahi NZ Transport Agency	DEV-NG-O2	Amend provision as follows: Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves:	3.12.2	Reject	See body of the report	No

⁶² Opposed by Rebecca Davis [FS127.489]

⁶³ Supported by Rebecca Davis [FS127.482]

⁶⁴ Supported by GWRC [FS74.177]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			... 7. An urban form that is integrated with the <u>a safe and connected</u> transport network and encourages <u>includes</u> active transport modes; and ...				
OS82.3 ⁶⁵	QEII National Trust (QEII)	DEV-NG-O2	Subdivision, use and development in the Medium Density Residential Zone and Neighbourhood Centre Zone of the Northern Growth Development Area achieves: 1. A well-functioning urban environment consistent with the Northern Growth Development Area Structure Plan; 8. Development that maintains and protects and, where possible, enhances ecological values and the health and wellbeing of receiving waterbodies including Te Awarua-O-Porirua Harbour and other downstream catchments. 9. <u>Development that maintains and protects, and where possible, enhances ecological values of Significant Natural Areas (including but not limited to those identified in SCHED7 – Significant Natural Areas).</u>	3.12.2	Accept in part	See body of the report	Yes
OS47.9 ⁶⁶	Pukerua Bay Residents Association	DEV-NG-O3	Amend as follows: Infrastructure with sufficient capacity is provided at the time of subdivision for urban use and is developed in an integrated, efficient and comprehensive manner to meet the planned needs of the Northern Growth Development Area, <u>and the anticipated impact of more extreme weather events resulting from climate change.</u>	3.12.3	Reject	See body of the report	No
OS58.94	Fire and Emergency New Zealand	DEV-NG-O3	Retain as notified.	n/a	Accept	No amendments are recommended to this objective.	No
OS81.32	Waka Kotahi NZ Transport Agency	DEV-NG-O3	Retain as notified.	n/a	Accept	No amendments are recommended to this objective.	No
Policies							
OS32.25 ⁶⁷	Harbour Trust & Guardians of Pāuatahanui Inlet	DEV-NG-P2	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Supports the provisions in DEV-NG-P2-6, 7, 8, and 9. When any development proceeds in the Northern Growth Area, we consider that both the intent and detail of these provisions must be closely adhered to, monitored and enforced.</i>	n/a	Accept	Monitoring and enforcement of the district plan is a function of Council	No
OS47.10	Pukerua Bay Residents Association	DEV-NG-P2	Add the following text as clause 4(d): Allows for the staging of the development in a manner that supports progressive access to public transport and open space connectivity;	3.13.1	Reject	See body of the report	No
FS74.95	GWRC		<i>Greater Wellington seek the amendment to DEV-NG-P2 as requested. Reasons stated as:</i>				

⁶⁵ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.94], Greater Wellington Regional Council [FS74.180] and Rebecca Davis [FS127.385]

⁶⁶ Supported by Greater Wellington Regional Council [FS74.94] and Rebecca Davis [FS127.451]

⁶⁷ Supported by Rebecca Davis [FS127.476]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			<i>Greater Wellington support the requested amendment to DEV-NG-P4 as it ensures public transport options will be available as the development progresses. This change has regard to Proposed RPS Change 1, specifically Policy 57.</i>				
OS47.11	Pukerua Bay Residents Association	DEV-NG-P2	Amend 10: Provides parks, reserves, pathways and open space areas through the full extent of the built areas, including a mixed-use neighbourhood community park and neighbourhood parks, street-level gathering places, and gully and hilltop reserves where opportunities exist; and	3.13.1	Reject	See body of the report	No
OS59.6 ⁶⁸	Pukerua Property Group Limited	DEV-NG-P2	[...] 8. Demonstrates that use and development within the Freshwater Management Areas identified on the Structure Plan: [...] c. Recognises and provides opportunities to enhance freshwater ecology, public access to and along freshwater bodies, and resilience to flood risk; d. Provides for earthworks (where necessary and appropriate) for urban development including infrastructure and reserve networks.	3.13.1	Reject	See body of the report	No
OS65.3 ⁶⁹	Gray Street Pukerua Bay Residents Group	DEV-NG-P2	Seeks amendment to replace the wording: "with a sufficient width scale" to read "with a minimum width of 50 metres" Seeks amendment to replace the wording: "appropriate mitigation of any severance caused by roads" with "no severance caused by roads"	3.13.1	Reject	See body of the report	No
OS68.5 ⁷⁰	Friends of Taupo Swamp & Catchment Inc	DEV-NG-P2	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Supports & reiterates the provisions in DEV NG P2.</i>	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
OS74.69	Greater Wellington Regional Council	DEV-NG-P2	In relation to DEV-NG-P2 Clause 7 - Retain as notified.	n/a	Accept	No amendments are recommended to this policy clause.	No
OS74.70 ⁷¹	Greater Wellington Regional Council	DEV-NG-P2	Change wording of clause 8 to: Demonstrates that use and development within <u>impacts on</u> Freshwater Management Areas... Clarify in clause 9 that the term "hydraulic neutrality" is consistent with the definition of "hydrological controls" in Proposed RPS Change 1.	3.13.1	Reject	See body of the report	No

⁶⁸ Opposed by Rebecca Davis [FS127.490]

⁶⁹ Supported by Alan Collett [FS99.25]

⁷⁰ Supported by Rebecca Davis [FS127.483]

⁷¹ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.52]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS74.88	Greater Wellington Regional Council	DEV-NG-P2	In relation to DEV-NG-P2 Clause 6 - Retain as notified.	n/a	Accept	No amendments are recommended to this policy clause.	No
OS81.33	Waka Kotahi NZ Transport Agency	DEV-NG-P2	Amend provision as follows: Provide for subdivision that is in accordance with the Northern Growth Development Area Structure Plan, and where the design and layout of the subdivision: 4. Provides a transport network layout and design that: ... c) Provides for <u>active modes pedestrian</u> and open space connectivity, including by incorporating legal public access along indicative track routes identified on the Structure Plan, and providing for opportunities to create recreational and open space linkages; d) <u>is safe for all transport users.</u> e) <u>Provides for active transport .</u>	3.13.1	Accept in part	See body of the report	Yes
OS82.4 ⁷²	QEII National Trust (QEII)	DEV-NG-P2 5. Recognises and enhances ecological values of the Development Area, including by: 1. a. Creating buffer areas around the edges of Significant Natural Areas (<u>including but not limited to those identified in SCHED7 – Significant Natural Areas</u>); and 2. b. Creating ecological corridors in the locations identified on the Structure Plan which will, over time, become dominated by indigenous vegetation, with a sufficient width, scale, and appropriate mitigation of any severance caused by roads, to connect and enhance Significant Natural Areas; 6. <u>Following the effects management hierarchy with regard to addressing adverse effects on waterbodies, including by avoiding adverse effects on waterbodies where possible; Minimises adverse effects on waterbodies;</u>	3.13.1	Reject	See body of the report	No
OS47.20	Pukerua Bay Residents Association	DEV-NG-P3	Add the following text to the clause: 3. It will compromise any cultural, spiritual and/or historical values, <u>sites of significance</u> , interests or associations of importance to Ngāti Toa Rangatira that are associated with the Northern Growth Development Area and if so, the outcomes of any consultation with Ngāti Toa Rangatira, in particular with respect to mitigation measures and/or the incorporation of mātauranga Māori principles into the design and development of the activity;	3.13.2	Reject	See body of the report	No

⁷² Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.95], GWRC [FS74.159] and Rebecca Davis [FS127.386]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS74.71	Greater Wellington Regional Council	DEV-NG-P3	Retain as notified.	n/a	Accept in part	Accept in part, subject to amendments made in response to other submissions	No
OS81.34	Waka Kotahi NZ Transport Agency	DEV-NG-P3	Amend provision as follows: Only allow subdivision, use and development that is potentially not in accordance with the Northern Growth Development Area Structure Plan where it is demonstrated that it is appropriate for such subdivision, use or development to occur within the Development Area, having regard to whether: 1. The purpose and effects of the subdivision, use or development are likely to constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan, including consideration of: 3. ... f. <u>A safe and connected transport networks that provides for active modes and transport and that allows ease of movement to, from and within the Development Area; and</u>	3.13.2	Accept in part	See body of the report	Yes
OS47.12 ⁷³	Pukerua Bay Residents Association	DEV-NG-P4	Amend as follows: <u>3: Compromise any cultural, spiritual and/or historical values, sites of significance, interests or associations of importance to Ngāti Toa Rangatira;</u> 4. Do not provide sufficient <u>extra</u> infrastructure to service its needs and/or constrain, limit or compromise the efficient provision of infrastructure to service the Structure Plan.	3.13.3	Reject	See body of the report	No
OS74.72 ⁷⁴	Greater Wellington Regional Council	DEV-NG-P4	Amend DEV-NG-P4 as follows: Avoid subdivision, use or development that is not in accordance with the Northern Growth Development Area Structure Plan, where these: 1. Constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan; 2. Result in adverse effects on the planned urban built environment of Development Area, which cannot be appropriately avoided, remedied or mitigated; <u>3. Are located within areas of high Flood Hazard risk; or</u> <u>4</u> 3 . Do not provide sufficient infrastructure to service its needs and/or constrain, limit or compromise the efficient provision of infrastructure to service the Structure Plan.	3.13.3	Reject	See body of the report	No

⁷³ Supported by GWRC [FS74.96]

⁷⁴ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.53]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS82.6 ⁷⁵	QEII National Trust (QEII)	DEV-NG-P4	Avoid subdivision, use or development that is not in accordance with the Northern Growth Development Area Structure Plan, where these: 1. Constrain, limit or compromise the intended development and use of the Development Area as set out in the Structure Plan; 2. Result in adverse effects on the planned urban built environment of Development Area, which cannot be appropriately avoided, remedied or mitigated; or 3. Do not provide sufficient infrastructure to service its needs and/or constrain, limit or compromise the efficient provision of infrastructure to service the Structure Plan; <u>or</u> 4. <u>Are unable to provide adequate protection to significant natural areas and waterbodies identified in the Structure Plan.</u>	3.13.3	Reject	See body of the report	No
Rules							
OS65.4	Gray Street Pukerua Bay Residents Group	General	Seeks amendment so that any development not in accordance with the standards of the Northern Growth Development Area Structure Plan, and/or does not comply with the relevant provisions in the District Plan, has the requirement for the community to be notified and given the opportunity to provide feedback. Seeks the section 95A exemption for notification and review removed.	3.14	Reject	See body of the report	No
Northern Growth Development Area Structure Plan							
OS65.1 ⁷⁶	Gray Street Pukerua Bay Residents Group	DEV-NG-Figure 1	Seeks the Structure Plan map clearly identify to correct scale the requirement of the 50 metre wide Ecological Connections and for these to be situated directly adjacent to the existing PCC reserve land to create a contiguous corridor, with no road severance allowable. [Refer to original submission for full decision requested]	3.15	Accept in part	See body of the report	Yes
OS65.2 ⁷⁷	Gray Street Pukerua Bay Residents Group	DEV-NG-P1	Seeks the more detailed Ecological Connections on the Structure Plan Map, to be used as the guidance for the Northern Growth Development Area. [Refer to original submission for full decision requested]	3.15	Accept in part	See body of the report	Yes
OS65.6 ⁷⁸	Gray Street Pukerua Bay Residents Group	DEV-NG-Figure 1	Seeks the boxed area to be drawn onto DEV-NG-Figure 1 Northern Growth Development Area Structure Plan, replacing the blue arrows council has on map currently.	3.15	Accept in part	See body of the report	Yes
APP17 - Ecological Corridors and SNA Buffer Areas							
OS65.5 ⁷⁹	Gray Street Pukerua Bay Residents Group	General	Seeks that the type of planting required in the Ecological Connections to be specified as large trees suitable as habitat for native birds.	3.16	Reject	See body of the report	No
OS74.77	Greater Wellington Regional Council	General	Retain Appendix 17.	n/a	Accept	There are no recommended amendments to this appendix.	No

⁷⁵ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.97], GWRC [FS74.160] and Rebecca Davis [FS127.388]

⁷⁶ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.29] and Alan Collett [FS99.23]

⁷⁷ Supported by Alan Collett [FS99.24]

⁷⁸ Supported by Alan Collett [FS99.28]

⁷⁹ Supported by Alan Collett [FS99.27]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS82.9 ⁸⁰	QEII National Trust (QEII)	General	B. Planting Plans A planting plan for any revegetation planting must identify the following: ... u. Site planting, including species to be planted, sourcing of the plants (<u>eco-sourcing is required</u>), size and spacing of plants....	3.16	Reject	See body of the report	No
Other methods							
OS47.2	Pukerua Bay Residents Association	Urban Form	PCC should continue to support the development of a design guide that support and encourages universal accessible design principles for homes and recreational areas.	3.17	Accept in part	See body of the report	No
OS81.7	Waka Kotahi NZ Transport Agency	NGDA Boundary	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>As part of Variation 1, Porirua City Council have re-zoned the Pukerua Bay Area of the Northern Growth Area (NGA) from part Future Urban Zone and Rural Lifestyle Zone to Medium Density Residential Zone. The zoning will enable 1,500 new homes. Understands that this rezoning is supported by a Structure Plan and specific development area provisions.</i> <i>An integrated planning approach including the development of a transport strategy for the NGA as a whole is required to support the provision of quality, mixed-use, compact urban development that efficiently uses land, reduces travel distances and lowers reliance on private vehicles. This also contributes to achieving the government's transport outcomes.</i>	3.17	Accept in part	See body of the report	No
OS81.9 ⁸¹	Waka Kotahi NZ Transport Agency	Planning Maps	Seeks: <ul style="list-style-type: none"> An integrated planning approach be progressed to support the zoning of the NGA as a whole package; and This is achieved by the development of an overarching transport strategy to ensure land use is integrated in a manner that provides a safe and connected transport network, and achieves the government and regional transport goals of emissions and VKT reductions. 	3.17	Accept in part	See body of the report	No
SCHED7 - Significant Natural Areas							
OS74.78	Greater Wellington Regional Council	SNAs	Retain amendments to Schedule 7.	n/a	Accept	Agree with submitter	No
Planning Maps							
OS22.1	On Behalf of landowner SS Pointon	NGDA Boundary	Adjust the residential zone boundary of NGA to include two portions of land shown as areas A and B in submission. [Refer to original submission for full decision requested, including attachment]	3.10.1	Reject	See body of report	No
OS27.3 ⁸²	Pukerua Holdings Limited	RLZ Rural Lifestyle Zone	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Supports the proposed rezoning of the additional rural residential land within the Northern Growth Area Development. This will enable a more economically viable development, and critically unlock 50 hectares of stunning native bush in the north-eastern precinct of the Muri Road block, previously closed to the community</i>	n/a	Accept	Agree with submitter	No

⁸⁰ Supported by Rebecca Davis [FS127.391]

⁸¹ Supported by GWRC [FS74.176]

⁸² Supported by Ron Lucas on behalf of landowner SS Pointon [FS22.4]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS59.1 ⁸³	Pukerua Property Group Limited	NGDA Boundary	Generally supports identifying the land [422, 422A and 422B State Highway 1, Pukerua Bay] within the Northern Growth Area.	n/a	Accept	Agree with submitter	No
OS74.73 ⁸⁴	Greater Wellington Regional Council	Flood Hazards	Amend to include ponding zones and overland flow paths in flood hazard overlays in the Northern Growth Area.	3.10.2	Accept	See body of report	Yes

⁸³ Opposed by Rebecca Davis [FS127.485]

⁸⁴ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.54]. Opposed by Kāinga Ora [FS76.386]

Appendix C. RPS Proposed Change 1

C1. Proposed Change 1 Objectives and Policies referred to in Submissions

Objective 22

Clause	Comments
Urban development, including housing and infrastructure, is enabled where it demonstrates the characteristics and qualities of well-functioning urban environments, which:	The development of a well-functioning urban environment is a key objective of the NGDA.
(a) Are compact and well designed; and	The NGDA residential area is proposed to be zoned MRZ, consistent with the other residential areas within Porirua under Variation 1. A Structure Plan has been prepared to ensure good urban form outcomes.
(b) Provide for sufficient development capacity to meet the needs of current and future generations; and	The NGDA will increase housing development capacity within Porirua.
(c) Improve the overall health, well-being and quality of life of the people of the region; and	Health and wellbeing in an urban environment are discussed in the Section 32 Evaluation Report Part A.
(d) Prioritise the protection and enhancement of the quality and quantity of freshwater; and	The Structure Plan incorporates Freshwater Management Areas to identify freshwater protection and enhancement may occur.
(e) Achieve the objectives in this RPS relating to the management of air, land, freshwater, coast, and indigenous biodiversity; and	The relevant RPS objectives are set out in section 4.12 of the Section 32 Evaluation Report Part B Northern Growth Development Area. Generally, the relevant RPS objectives relating to the management of air, land, freshwater, coast, and indigenous biodiversity are addressed by the wider PDP chapter provisions. Those areas specific to the NGDA are addressed by the Structure Plan and associated policies and methods in the DEV – NG chapter.
(f) Support the transition to a low-emission and climate-resilient region; and	Encouraging use of active transport modes is part of the outcomes sought by DEV-NG-O2.
(g) Provide for a variety of homes that meet the needs, in terms of type, price, and location, of different households; and	A variety of housing types, sizes and tenures is part of the outcomes sought by DEV-NG-O2.

Clause	Comments
(h) Enable Māori to express their cultural and traditional norms by providing for mana whenua / tangata whenua and their relationship with their culture, land, water, sites, wāhi tapu and other taonga; and	Sites and areas of significance to Māori are addressed by the SASM chapter of the PDP. There are no SASM identified within the NGDA. NPS-UD Policy 1(a)(ii) relates to enabling a variety of homes that enable Māori to express their cultural traditions and norms. The MRZ includes Papakāinga as a permitted activity.
(i) Support the competitive operation of land and development markets in ways that improve housing affordability, including enabling intensification; and	The NGDA will assist in supporting a competitive housing land and development market through increasing housing development capacity.
(j) Provide for commercial and industrial development in appropriate locations, including employment close to where people live; and	The NGDA incorporates an area of NCZ in an appropriate location and at a scale supported by economic evidence.
(k) Are well connected through multi-modal (private vehicles, public transport, walking, micro-mobility and cycling) transport networks that provide for good accessibility for all people between housing, jobs, community services, natural spaces, and open space.	The NGDA Structure Plan incorporates proposed tracks to enable active transport. The NGDA is located in proximity of strategic roading and commuter rail infrastructure.

Policy 55: Providing for appropriate urban expansion

Clause	Comments
When considering an application for a resource consent, or a change, variation or review of a district plan for urban development beyond the region's urban areas (as at August 2022), particular regard shall be given to whether:	Appropriate regard has been given to the matters of Policy 55 through the development of the NGDA.
(a) the urban development contributes to establishing or maintaining the qualities of a well-functioning urban environment, including:	
(i) the urban development will be well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors;	The NGDA includes an area of FUZ and connects to the existing urban area of Pukerua Bay, as well as forming part of the wider Northern Growth Area.
(ii) the location, design and layout of the proposed development shall apply the specific management or protection for values or	
1. Avoiding inappropriate subdivision, use and development in areas at risk from natural hazards as required by Policy 29,	Natural hazards are addressed by the NH chapter of the PDP. Risk from natural hazards is incorporated into NG – DEV policies DEV-NG-P2 and DEV-NG-P3.
2. Protecting indigenous ecosystems and habitats with significant indigenous biodiversity values as identified by Policy 23,	Indigenous biodiversity is addressed by the ECO chapter of the PDP. Recognising and enhancing ecological values is incorporated

Clause		Comments
	resources identified by this RPS, including:	into NG – DEV policies DEV-NG-P2 and DEV-NG-P3. Providing buffer areas and ecological connections is incorporated into the subdivision rule for the NGDA.
	3. Protecting outstanding natural features and landscape values as identified by Policy 25,	ONFLs are addressed by the NFL chapter of the PDP. There are no NFL or SAL identified within the NGDA.
	4. Protecting historic heritage values as identified by Policy 22,	Historic heritage values are addressed by the HH chapter of the PDP. There are no HH site, items or buildings identified within the NGDA.
	5. Integrates Te Mana o Te Wai consistent with Policy 42,	A Stormwater Management Assessment was undertaken for the NGDA, which incorporated consideration of Te Mana o Te Wai. Note: Policy 42 sets out considerations for regional consent applications.
	6. Provides for climate resilience and supports a low or zero carbon transport network consistent with Policies CC.1, CC.4, CC.10 and CC17.	The NGDA Structure Plan incorporates proposed tracks to enable active transport. The NGDA is located in proximity of commuter rail infrastructure. These aspects will support low carbon transport options.
	7. Recognises and provides for values of significance to mana whenua / tangata whenua,	Sites and areas of significance to Māor are addressed by the SASM chapter of the PDP. There are no SASM identified within the NGDA. Not compromising cultural, spiritual and/or historical values, interests or associations of importance to Ngāti Toa Rangatira is incorporated into DEV-NG-P3.
	8. Protecting Regionally Significant Infrastructure as identified by Policy 8; and	There is no RSI identified within the NGDA. Transport network connections to the SH58 from the NGDA will be managed under the relevant PDP provisions. Reverse sensitivity effects relating to SH58 and NIMT are managed under the NOISE chapter of the PDP.

Clause	Comments
(b) the urban development is consistent with any Future Development Strategy, or the regional or local strategic growth and/or development framework or strategy that describes where and how future urban development should occur in that district or region, should the Future Development Strategy be yet to be released; and	The NGDA is located within the Northern Growth Area identified in the Porirua Growth Strategy 2048.
(c) a structure plan has been prepared; and/or	A Structure Plan has been prepared and is incorporated into Variation 1 in accordance with FUZ-P2 and APP11 - Future Urban Zone Structure Plan Guidance of the PDP.
(d) Any urban development that would provide for significant development capacity, regardless of if the development was out of sequence or unanticipated by growth or development strategies.	The NGDA is estimated to provide future development capacity for around 1,500 residential dwellings.

Policy UD.3: Responsive planning to developments that provide for significant development capacity – consideration

Clause	Comments
When considering a change of a district plan for a development in accordance with clause (d) of Policy 55, particular regard shall be given to whether the following criteria is met:	The criteria set out in the policy are generally met by the NGDA provisions.
(a) the location, design and layout of the proposal:	(i) contributes to establishing or maintaining the characteristics and qualities of a well-functioning urban environment identified in Policy 55(a)(ii) and Objective 22,
	(ii) is well-connected to the existing or planned urban area, particularly if it is located along existing or planned transport corridors,
	(iii) for housing will apply a relevant residential zone or other urban zone that provides for high density development or medium density residential development,
(b) the proposal makes a significant contribution to meeting a need identified in the latest Housing and Business Development Capacity Assessment, or a shortage identified in monitoring for: (i) a variety of housing that meets the regional, district, or local shortages of housing in relation to the particular type, size, or format, (ii) business space or land of a particular size or locational type, or	Variation 1 proposes that the residential zoning within the NGDA is MRZ. Variation 1 has been informed by the Wellington Regional Housing & Business Development Capacity Assessment 2022. Indicators show continuing unaffordability of housing in Porirua, together with a rapid acceleration in house prices.

Clause	Comments
(iii) community, cultural, health, or educational facilities, and (iv) the proposal contributes to housing affordability through a general increase in supply or through providing non-market housing, and	<p>Additionally, the key findings of Porirua Housing Typology Demand Analysis (Property Economics, December 2021) were that 80% of demand is for standalone housing, 20% of demand is for joined housing (terraced housing and apartments) and the majority of demand is for 2-bed and 3-bed residential units.</p> <p>The NGDA proposal will contribute to housing affordability through a general increase in supply.</p>
(c) when considering the significance of the proposal's contribution to a matter in (b), this means that the proposal's contribution: (i) is of high yield relative to either the forecast demand or the identified shortfall, (ii) will be realised in a timely (i.e., rapid) manner, (iii) is likely to be taken up, and (iv) will facilitate a net increase in district-wide up-take in the short to medium term,	
(d) required development infrastructure can be provided effectively and efficiently for the proposal, and without material impact on planned development infrastructure provision to, or reduction in development infrastructure capacity available for, other feasible, likely to be realised developments, in the short-medium term.	

Policy CC.4: Climate resilient urban areas – district and regional plans

Clause	Comments
District and regional plans shall include policies, rules and/or methods to provide for climate-resilient urban areas by providing for actions and initiatives described in Policy CC.14 which support delivering the characteristics and qualities of well-functioning urban environments.	The matter in CC.14 are addressed below.

Policy CC.14: Climate-resilient urban areas – consideration

Clause	Comments
When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, provide for actions and initiatives, particularly the use of nature-based solutions, that contribute to climate resilient urban areas, including:	Appropriate regard has been given to the matters of Policy CC.14 through the development of the NGDA provisions.
(a) maintaining, enhancing, restoring, and/or creating urban greening at a range of spatial scales to provide urban cooling, including working towards a target of 10 percent tree canopy cover at a suburb-scale by 2030, and 30 percent cover by 2050,	This matter is addressed through the protection of existing SNAs on the site under the ECO chapter of the PDP, enhancement of those SNAs by ecological connections and buffer areas through the DEV – NG chapter, and the

Clause	Comments
	requirements for street trees under the INF chapter.
(b) the application of water sensitive urban design principles to integrate natural water systems into built form and landscapes, to reduce flooding, improve water quality and overall environmental quality,	Water sensitive urban design is addressed by the Stormwater Management Site Assessment undertaken for the NGDA, and the inclusion of the FMA and associated policy direction in the DEV – NG chapter.
(c) capturing, storing, and recycling water at a community-scale (for example, by requiring rain tanks, and setting targets for urban roof area rainwater collection),	This matter is addressed by the requirements of the THWT chapter of the PDP, including through requirements for rainwater retention tanks.
(d) protecting, enhancing, or restoring natural ecosystems to strengthen the resilience of communities to the impacts of natural hazards and the effects of climate change,	Protection of ecosystems is addressed by the ECO chapter of the PDP. This is also a matter addressed by the DEV - NG chapter though enhancement of SNAs by ecological connections and buffer areas.
(e) providing for efficient use of water and energy in buildings and infrastructure, and	These are Building Act 2004 matters.
(f) buildings and infrastructure that are able to withstand the predicted future temperatures, intensity and duration of rainfall and wind.	

Appendix D. Report Author's Qualifications and Experience

My name is Rory McLaren Smeaton. I hold the following qualifications:

- Bachelor of Science in Geography (University of Canterbury);
- Postgraduate Diploma in Science in Geography (with Distinction) (University of Canterbury);
and
- Master of Planning Practice (First Class Honours) (University of Auckland).

I am a full member of the New Zealand Planning Institute. I have more than ten years' experience in working as a planner for local and central government organisations, and a multi-disciplinary consultancy.

I have been employed by the Porirua City Council since April 2020 as a Senior Policy Planner within the Environment and City Planning Team. My work at PCC has included finalising PDP chapters and preparing the associated section 32 reports, summarising submissions, and preparing section 42A reports.