

OFFICER'S REPORT FOR:

Independent Hearing Commissioners:

Trevor Robinson (Chair)

Miria Pomare

David McMahon

Mark St Clair

Julia Williams

SUBJECT:

**Proposed Porirua District Plan: District-Wide
Matters**

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) as they apply to the district-wide chapters, including the relevant submissions received on Variation 1. 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 district-wide chapters through the initial submissions on the PDP, and on the amendments proposed through Variation 1. 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:
 - Having regard to Proposed Change 1 to the Regional Policy Statement for the Wellington Region 2013 (RPS), including:
 - Provisions for nature-based solutions and green and low carbon infrastructure;
 - Requiring provision of infrastructure in subdivision development that supports modal shift; and
 - Consideration of how subdivision design can reduce greenhouse gas emissions;
 - The height of telecommunication support structures;
 - Provisions to achieve 'hydraulic positivity';
 - Provisions supporting active and zero or low carbon transport;
 - Inclusion of provisions to address liquefaction and landslide hazard risk;
 - The wording of provisions addressing infrastructure in the SUB – Subdivision chapter;
 - The minimum allotment sizes in residential zones and the associated shape factor requirements;
 - Providing for de-centralised wastewater systems;
 - Indoor noise design level requirements for retirement villages located in commercial and mixed use zones; and
 - Infrastructure capacity to support intensification.
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, as amended by Variation 1, to address matters raised in submissions and these are summarised below:
 - Amending SUB-O2 to be broader in referring to infrastructure more generally, and clarifying the outcomes sought for urban and non-urban areas;
 - Amending SUB-P6 to correct to reference to the relevant residential zones;
 - Adding a new clause to SUB-S1 to clarify the requirements for shape factor rectangles, and deleting the requirements from within SUB-Table 1;

- Amend INF-S3 to exclude lightning rods;
 - An amendment to the heading of THWT-R5 under Clause 16 of Schedule 1 to fix an issue resulting from the deletion of the definition of 'multi-unit housing' through Variation 1.
5. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP, as amended by Variation 1, should be amended as set out in 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.

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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
IPI	Intensification Planning Instrument
ISPP	Intensification Streamlined Planning Process
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
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 2022
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
Proposed Change 1	Change 1 to the Regional Policy Statement for the Wellington Region 2013
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 Appeals Version – final 2022
RMA-EHS	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021
RPS	Regional Policy Statement for the Wellington Region 2013
RSI	Regionally Significant Infrastructure
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

Abbreviation	Means
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
KLP	Kenepuru Limited Partnership
KiwiRail	KiwiRail Holdings Limited
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
PRA	Plimmerton Residents' Association
QEII	Queen Elizabeth the Second National Trust
RNZ	Radio New Zealand
RVA	Retirement Villages Association of New Zealand Incorporated
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 district-wide chapters 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 district-wide chapters 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 Officers Report Part A - Overarching.
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 Officer's Report: Part A – Overview 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 C of this report.
15. My role in preparing this report is that of an expert planner. I confirm that the issues addressed in this section 42A report are within my area of expertise as an expert policy 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. 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.

18. 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.
19. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

1.3 Key Issues in Contention

20. A number of submissions and further submissions were received on the provisions in the district-wide chapters. The submissions received were diverse and sought a range of outcomes; including, for example, inclusion of a policy that seeks nature-based solutions when providing for new infrastructure and in new developments, and seeking that liquefaction and landslide hazards be included in the Natural Hazards section.
21. I consider the following to be the key issues in contention in the chapter:
 - Having regard to Proposed Change 1 to the Regional Policy Statement for the Wellington Region 2013 (RPS), including:
 - Provisions for nature-based solutions and green and low carbon infrastructure;
 - Requiring provision of infrastructure in subdivision development that supports modal shift; and
 - Consideration of how subdivision design can reduce greenhouse gas emissions;
 - The height of telecommunication support structures;
 - Provisions to achieve 'hydraulic positivity';
 - Provisions supporting active and zero or low carbon transport;
 - Inclusion of provisions to address liquefaction and landslide hazard risk;
 - The wording of provisions addressing infrastructure in the SUB – Subdivision chapter;
 - The minimum allotment sizes in residential zones and the associated shape factor requirements;
 - Providing for de-centralised wastewater systems;
 - Indoor noise design level requirements for retirement villages located in commercial and mixed use zones; and
 - Infrastructure capacity to support intensification.
22. I address each of these key issues in this report, as well as any other issues raised by submissions.

1.4 Procedural Matters

23. 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 district-wide chapters.

2 Statutory Considerations

2.1 Resource Management Act 1991

24. 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,
25. 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 – Overview, including the approach the Council has taken to giving effect to the NPS-UD.
26. The sections below provide a brief discussion on the relevant matters of the higher order planning documents relevant to the district-wide chapters.

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

27. 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)).
28. 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.
29. 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

30. 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.
31. 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

32. 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:
 - Walkable catchment of a Metropolitan Centre Zone;
 - Walkable catchment of a rapid transit stop; and
 - Areas of high demand and/or well-served by existing or planned active and public transport.
33. 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.
34. 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 RPS as Objective 22A and Table 9A under section 55(2) of the RMA.

2.3.3 National Policy Statement on Highly Productive Land

35. 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.
36. 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.

37. 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;
38. The approach to the NPS-HPL 2022 is discussed in the Section 42A report Part A – Overview.

2.4 Proposed Change 1 to the RPS

39. 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.
40. 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.
41. The policies as included or amended by Proposed Change 1 that may be relevant to the district-wide chapters include those relating to transport (Policies CC.1, CC.2, CC.3, CC.9, CC.11, 57), infrastructure (Policies CC.7, 7, 39 and 58), earthworks (Policy 15), water use (Policies FW.2, FW.5), urban development generally (Policies FW.3, CC.14), indigenous biodiversity (Policies 23, 24, 47, IE.1 and IE.2), natural hazards (Policies 29, 51 and 52), relationships of mana whenua / tangata whenua (Policies UD.1, UD.2) and integrated management (Policy IM.1)
42. 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

43. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA of the RMA. 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).

44. The required section 32AA evaluation for changes proposed as a result of consideration of submissions with respect to the district-wide chapters 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

45. No consideration of trade competition has been given with respect to any submissions on the district-wide chapters.
46. There are no known trade competition issues raised within the submissions.

3 Consideration of Submissions and Further Submissions

3.1 Overview

47. Ten submissions on the SUB – Subdivision chapter received following notification of the PDP in 2020 were identified as potentially relating to provisions that may have been affected by the variation required to give effect to the NPS-UD and the RMA-EHS (subsequently notified as Variation 1). Those submissions were identified in section 1.3 of the Officer's Report: Part B – Subdivision (excluding urban zones). These submissions related to SUB-O2, SUB-P5 clauses 2 and 3, and SUB-S1, and are set out in Table B 1 in Appendix B. Fourteen further submission points were received on these submissions.
48. As identified in Table B 1 in Appendix B the submissions on SUB-Table 1 (Survey + Spatial [72.11], KLP [59.10] and PCC [11.62]) are recommended to be deemed to be submissions against Variation 1 in accordance with Clause 16B of Schedule 1.
49. Following notification of Variation 1, a range of submissions and further submissions were received on the following district-wide chapters:
 - INF - Infrastructure chapter;
 - THWT – Three Waters chapter;
 - TR – Transport chapter;
 - NH – Natural Hazards chapter;
 - SUB – Subdivision chapter;
 - EW - Earthworks chapter; and
 - NOISE – Noise chapter.
50. Submission points were also received relating to the general topics of infrastructure capacity and SNAs.
51. Given the range of topics addressed by the various district-wide chapters, the matters raised by the submissions were diverse.

3.1.1 Report Structure

52. Submissions on the district-wide chapters 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 relevant chapters are set out 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 Infrastructure

3.2.1 Nature-based solutions, and green and low carbon infrastructure

3.2.1.1 Matters raised by submitters

62. GWRC [OS74.18, OS74.34, OS74.81 and OS74.82] seeks:
- Inclusion of a policy that seeks nature-based solutions when providing for new infrastructure and in new developments, such as the use of green infrastructure;
 - Permit the development of green infrastructure in appropriate locations and subject to necessary controls; and
 - Amend INF-P1 to reflect low and zero carbon regionally significant infrastructure.
63. In relation to nature-based solutions and green infrastructure, the stated reasons refer to Policies CC.7 and CC.12 of Proposed Change 1, which recognise nature-based solutions are an integral part of the climate change mitigation and adaptation response required in the region and also provide a number of other benefits for indigenous biodiversity and community well-being. Scope is stated as being through section 80(E) of the RMA.
64. In relation to INF-P1, the reasons refer to Policies CC.1, CC.2, CC.3, CC.9, CC.10, 7, 57 and 58 of Proposed Change 1 of the RPS. Scope is stated as being through section 80E(2)(d) of the RMA.

3.2.1.2 Assessment

65. The Officers' Report: Part A – Overarching Report contains general commentary on the weighting, scope and implementation timing of Proposed Change 1. I agree with the assessment in that report and note that the general statements are applicable to the policies identified in GWRC [OS74.18, OS74.34, OS74.81 and OS74.82].
66. I note that Policy CC.7 of Proposed Change 1 is:
- District and regional plans shall include objectives, policies, rules and/or methods that provide for nature-based solutions to climate change to be part of development and infrastructure planning and design.*
67. Policy CC.12 of Proposed Change 1 is:
- When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, a determination shall be made as to whether an activity may adversely affect a nature-based solution to climate change and particular regard shall be given to avoiding adverse effects on the climate change mitigation or adaptation functions.*
68. In my opinion, the relief sought by GWRC [OS74.34 and OS74.81] to include a policy that 'seeks' nature-based solutions is not consistent with the actual wording of Policy CC.7, which would

require provisions to 'provide for' nature-based solutions. 'Seeking' nature-based solutions is a more active position (and would be more appropriate to be expressed as an objective), whereas 'providing for' would be to allow for or enable the activities through the planning framework. Additionally, GWRC have not provided any wording for the additional provisions sought. This makes it somewhat difficult to agree with the submitter on any amendments to the PDP that may be appropriate in response to the submission.

69. In relation to submission point [OS74.82] I note that the INF – Infrastructure chapter includes permitted activity rules for infrastructure in appropriate locations and subject to relevant standards. These would apply equally to nature-based solutions, including under INF-R26 which relates to infrastructure not otherwise provided for or subject to any other rule in the chapter.
70. GWRC provides an example of the type of work sought to be permitted for the development of green infrastructure, being planting works undertaken by the regional council. I am unsure as to how planting would be captured by provisions for infrastructure under the PDP, other than when associated with wider infrastructure development.
71. As such, in having regard to Proposed Change 1 including CC.7 and CC.12, I do not consider that any amendments to the PDP are necessary in response to GWRC [OS74.34, OS74.81 and OS74.82].
72. In relation to [OS74.18], while acknowledging the proposed amendments to Policy 7 of the RPS which includes low and zero carbon regionally significant infrastructure in particular, I note that GWRC has not provided any specific amendments sought to the policy and the decision requested is quite vague, being amendments to 'reflect' low and zero carbon regionally significant infrastructure, and is not illuminated by the stated reasons. Additionally, the policy already recognises the benefits of regionally significant infrastructure generally, and as such this would include low and zero carbon infrastructure. As such, I do not recommend any amendments to INF-P1 in response to the submission from GWRC.

3.2.1.3 *Summary of recommendations*

73. I recommend for the reasons given in the assessment, that the submissions from GWRC [OS74.34, OS74.81 and OS74.82] be **rejected**.
74. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.2 **INF-S3**

3.2.2.1 *Matters raised by submitters*

75. Spark New Zealand Trading Limited and Vodafone New Zealand Ltd [OS33.1] seeks amendment of height limits in INF-S3, so that telecommunications facilities in all zones in this standard are permitted at a height of at least five metres above the maximum height of structures for the underlying zone, and clarification that the maximum height does not include lightning rods. The reasons are stated as being required for operational reasons

3.2.2.2 *Assessment*

76. In relation to the amendments sought to the maximum height under INF-S3, the standard provides for a range of structures, which include support structures for telecommunications

antennas. I note that the submission reasons state that “typically, a telecommunication facility should be at least 3m to 5m above adjacent buildings.” The standard enables heights of single-provider structures of at least three metres above the maximum height of structures for the underlying zone. Where there are two or more providers, this is increased to five metres. As such, the standard appears to already sufficiently provide for the outcome sought by the submitter, and additionally the standard provides an incentive for the co-location of services. As such, I do not agree with the amendments sought by the submitter on this matter.

77. However, in relation to the amendment sought to exclude lightning rods, I agree that this would provide consistency with the approach in the NES-TF. Additionally, I consider that the adverse effects would be negligible. For consistency, I consider that the amendment to give effect to the outcome sought should be an exemption within the standard, rather than in the heading.

3.2.2.3 Summary of recommendations

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

- a. **Amend** standard INF-S3 as set out in Appendix A:

Note: the amendments are not reproduced here due to length.

79. I recommend that the submission from Spark New Zealand Trading Limited and Vodafone New Zealand Ltd [OS33.1] be **accepted in part**.
80. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.2.4 Section 32AA evaluation

81. In my opinion, the amendments to INF-S3 are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:
- They will more clearly identify that lightning rods are not included in the maximum height standard. Consequently, they will reduce the likelihood of inadvertently requiring consent for activities that have no discernible adverse effects, and are more efficient and effective than the notified provisions in achieving the objectives of the PDP, particularly INF-O5.
 - The recommended amendments will not have any greater adverse environmental, social, or cultural costs than the notified provisions. However, there will be also benefits from improved plan interpretation and more efficient plan administration, and therefore may result in some positive economic effects for plan users.

3.3 Three Waters

3.3.1 Matters raised by submitters

82. The PRA [OS79.5] supports the inclusion of the Three Waters chapter, especially the concept of hydraulic neutrality, and the requirement for mitigation where this cannot be met. The submission seeks encouragement of developers to achieve hydraulic positivity in key risk areas where developments can improve an existing situation.
83. Andrew Wellum [OS16.2] seeks a range of new requirements relating to reuse of stormwater. No specific reasons are given.

84. GWRC [OS74.67] seeks direction to provide for de-centralised wastewater re-use and treatment of grey and black water and disposal using alternative wastewater systems (but not septic tanks) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required. The reasons include that; septic tanks have known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained; alternative wastewater treatment options often reduce potable water use significantly, and; reducing the pressure new development places on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible.

3.3.2 Assessment

85. The THWT – Three Waters chapter was considered in Hearing Stream 4. I prepared the Section 42A Report: Part B – Three Waters. While I recommended a number of amendments to the chapter, the chapter as a whole and the concept of hydraulic neutrality were not recommended to be removed from the PDP.
86. The THWT – Three Waters chapter is not subject to Variation 1 of the PDP. As such, the submission from the PRA [OS79.5] could be considered to be outside of scope of the Variation. However, I note that a similar request to that made by the PRA [OS79.5] in relation to hydraulic positivity was heard in Hearing Stream 4 addressed in section 3.7 Water Positivity in my Section 42A Report: Part B – Three Waters.¹
87. The PRA [OS79.5] does not define what it means by the term 'hydraulic positivity'. This does not seem to be a term that is in common usage, in either resource management or engineering professions. As such, it is not clear what 'encouragement of developers to achieve hydraulic positivity' would be seeking to achieve.
88. I note that in my Section 42A Report: Part B – Three Waters I addressed the fact that hydrological regimes and the biodiversity that they support are part of complex natural systems, and that caution needs to be exercised to avoid unintended consequences of well-meaning regulation.
89. For these reasons, I do not consider that any amendments to the PDP to encouragement of developers to achieve hydraulic positivity are necessary or appropriate.
90. In relation to the submission from Andrew Wellum [OS16.2], the supply of water, including non-potable water supplies, is regulated under the Building Act 2004 and the associated Building Code. I consider that the requested additional requirements requested by the submitter are not appropriate to be included in a district plan.
91. In relation to GWRC [OS74.67], this matter is assessed in 3.6.2 below in relation to a similar submission point from GWRC on the SUB – Subdivision chapter. For the same reasons, I do not consider that the submission should be accepted.

¹ In response to Te Awarua-o-Porirua Harbour & Catchments Community Trust, and Guardians of Pāuatahanui Inlet [77.15, 77.16 and 77.19]

3.3.3 Summary of recommendations

92. I recommend for the reasons given in the assessment, that the submissions from the PRA [OS79.5] be **accepted in part**.
93. I recommend for the reasons given in the assessment, that the submissions from the Andrew Wellum [OS16.2] and GWRC [OS74.67] be **rejected**.
94. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.4 Transport

3.4.1 Matters raised by submitters

95. Amos Mann [OS38.6 and OS38.10] states that they broadly 'support and request' the following:
 - The Council work closely with Waka Kotahi to make a more liveability-focused and climate-focused road and street network, especially where intensification is happening; and
 - The new bicycle and micro-mobility device parking requirements for commercial and community facilities in the Centres and Mixed Use zones.
96. The reasons stated include that the district plan must empower the development of a wide range of diverse and varied housing types in all residential zones, including Papakāinga and Co-housing.
97. Frances Cawthorn [OS104.7] and Isabella G F Cawthorn [OS83.13] seek that a standard be added requiring that developments adequately accommodate active travel as the building users' first-best choice for access. Isabella G F Cawthorn [OS83.13] states that this could include 'things like street-frontage space that's pleasant for bike and scooter parking, or a secure and readily accessible room'. Frances Cawthorn [OS104.7] also seeks universal accessibility as a 'non-negotiable'.
98. Melissa Story [OS101.1] seeks that each dwelling should provide at least one car space for every two people living in the dwelling. The stated reasons raise concerns about the safety of cars parked on the road and shared driveways.
99. Nash Alexander [OS88.7] does not seek specific amendments, but raises concerns around the lack of carparks provided when intensifying residential land use.
100. GWRC [OS74.27, OS74.29 and OS74.30] seeks:
 - TR-S9 and/or TR-Table 6 be amended to require EV or e-bike charging stations, including for residential development;
 - TR-Table 7 be amended to provide for thresholds for when consent applicants must prepare travel demand management plans (integrated transport assessments); and
 - TR-R5-3 include a requirement that the travel demand management plan (integrated transport assessment) includes the measures to reduce reliance on private vehicles and encourage modal shift to low carbon, active or public transport options.

101. The reasons refer to Policies CC.1, CC.2, CC.3, CC.9, CC.10, 7, 57 and 58 of Proposed Change 1 of the RPS. Scope is stated as being through section 80E(2)(d) of the RMA.

3.4.2 Assessment

102. While noting the support expressed for the broad matters addressed by the submitter, I do not consider that any amendments to the PDP are necessary in relation to the submission from Amos Mann [OS38.6 and OS38.10]. The district plan requirements for the design of roads were considered in Hearing Stream 4 in relation to the INF - Infrastructure chapter. Council works closely with Waka Kotahi in relation to the State Highway network within Porirua City, as well as through wider transport network projects. In relation to a climate-focused transport network, I note that section 74 of the RMA now includes a requirement to have regard to emissions reduction and national adaptation plans produced under the Climate Change Response Act 2002. TR-S9 sets out the requirements for on-site bicycle parking spaces, which was also considered in Hearing Stream 4 in relation to the TR – Transport chapter.
103. In relation to the submissions from Frances Cawthorn [OS104.7] and Isabella G F Cawthorn [OS83.13], as noted above the design of roads was considered in Hearing Stream 4 in relation to the INF - Infrastructure chapter. TR-S9 in the TR – Transport chapter sets out the requirements for on-site bicycle parking spaces, which was also considered in Hearing Stream 4. I do not consider any further amendments to the PDP are necessary in response to the submission of Frances Cawthorn [OS104.7] and Isabella G F Cawthorn [OS83.13] on Variation 1. Additionally, I note that these provisions were not amended by Variation 1.
104. In relation to the submissions from Melissa Story [OS101.1] and Nash Alexander [OS88.7], the NPS-UD directs Councils to remove minimum car parking requirements from district plans. The PDP must give effect to the NPS-UD.
105. In relation to the submissions from GWRC [OS74.29 and OS74.30] relating to travel demand management plans, I consider that it would be premature to rely on the policy direction within Plan Change 1 to set a requirement for the submission of a travel demand management plan with consent applications at currently uncertain development thresholds, prior to Policy CC.2 being tested through the Schedule 1 process. That policy may change significantly through that process. I note that the Officer's Report: Part A – Overarching Report contain general assessment of the submissions from GWRC relating to Proposed Change 1 in relation to weighting, scope and implementation timing, and notes a number of issues. I agree with the assessment in that report.
106. In relation to [OS74.27] which seeks that electric vehicle or e-bike charging stations be required, including for residential development, I note that no objectives or policies in Plan Change 1 refer specifically to charging stations. While Policy CC.3 sets a direction to enable infrastructure that supports the uptake of zero and low-carbon multi modal transport, that does not mean requiring the provision of that infrastructure. Additionally, the submitter has not provided any evidence that requiring such infrastructure would provide greater benefits than the associated costs. As such, I do not recommend that the requested amendment be made.
107. The Officers' Report: Part A – Overarching Report contains general commentary on the weighting, scope and implementation timing of Proposed Change 1. I agree with the assessment in that report and note that the general statements are applicable to the policies identified in GWRC [OS74.27, OS74.29 and OS74.30].

3.4.3 Summary of recommendations

108. I recommend for the reasons given in the assessment, that the submissions from Amos Mann [OS38.6 and OS38.10] be **accepted in part**.
109. I recommend for the reasons given in the assessment, that the submissions from Frances Cawthorn [OS104.7], Isabella G F Cawthorn [OS83.13], Melissa Story [OS101.1], Nash Alexander [OS88.7] and GWRC [OS74.27, OS74.29 and OS74.30] be **rejected**.
110. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.5 Natural Hazards

3.5.1 Matters raised by submitters

111. Toka Tū Ake EQC [OS37.3 and OS37.5] seeks that liquefaction and landslide hazards be included in the Natural Hazards section and rules included in the Natural Hazards, Subdivision, and Infrastructure chapters to restrict development in areas at high risk. The reasons stated include; that some areas of Porirua are at high risk of liquefaction in the event of an earthquake, and these areas overlap with an area which has been rezoned for higher density residential development, and; Porirua is at risk of landslides, due to high rainfall, earthquake risk, and a high density of slopes steeper than 20 degrees.

3.5.2 Assessment

112. I note that the submission from Toka Tū Ake EQC included associated points [OS37.1, OS37.2 and OS37.4] which relate to mapping of areas within the Fault Rupture zone, and regulatory liquefaction and landslide hazard overlays. These are addressed in Section 42A Report: Part A - Overarching.
113. I generally agree with Toka Tū Ake EQC that it would be beneficial for the district plan to address liquefaction and landslide hazards where these present significant risk. I note that section 6(h) of the RMA sets out the management of significant risks from natural hazards as a matter of national importance, and section 31(1)(b)(i) gives territorial authorities the function of control of any actual or potential effects of the use, development, or protection of land, for the purpose of the avoidance or mitigation of natural hazard. Sections 77I and 77O set out qualifying matters in applying the MDRS and policy 3 of the NPSUD to relevant residential zones, and intensification policies to urban non-residential areas, respectively. These include a matter of national importance that decision makers are required to recognise and provide for under section 6.
114. However, while the submitter links the risk of liquefaction and landslide hazards to intensification of land use proposed through Variation 1, I consider that the matters raised by Toka Tū Ake EQC [OS37.3 and OS37.5] are broader than the scope of Variation 1. Liquefaction and landslide hazards may present significant risk for land use and development in various areas of the district and not just urban areas. Equally, the NH – Natural Hazards, SUB – Subdivision, and INF – Infrastructure chapters, which are sought to be amended by the submitter, apply across the district. As such, it would not appear to be efficient or effective to seek to manage these risks specifically in relation to land use intensification provisions, which are the focus of Variation 1.

115. Additionally, I note that the guidance on including liquefaction in land use planning referred to by the submitter² states in relation to assessment and mapping that:

The district council should complete additional technical assessment and mapping as required to meet requirements in the relevant regional policy statement and, if relevant, any regional plan. Generally, assessment should be sufficient to be able to map information at a property level (at the scale of 1:10,000–1:5000) for areas in the district of existing or likely future development. Other land could be assessed and mapped at a 1:25,000 or greater scale.

The technical assessment information and maps should be an input to the engagement with stakeholders to develop appropriate district plan provisions. That engagement and decisions about appropriate provisions will also inform the exact nature and level of detail of technical assessment that is required.

Based on the technical assessment information and stakeholder engagement, district councils should prepare planning maps to support the planning response determined to manage the liquefaction-related risk. For a district plan, maps are most likely to be required at a level of refinement to support a detailed and specific rules framework.

116. The guidance document also states that “[i]nformation from the technical assessments described in this guidance should assist and provide a significant input to the section 32 evaluation”.
117. The inclusion of appropriate provisions to address liquefaction and landslide hazards within Porirua would likely affect a number of stakeholders, landowners and residents of Porirua. The Council has not commissioned or undertaken technical assessments referred to in this guidance or any stakeholder engagement, and nor has the submitter provided any technical evidence to support the request for a planning framework to address liquefaction and landslide hazards.
118. Additionally, the submitter has not articulated the specific planning provisions sought to be included in the PDP, nor provided any high level direction (other than reference to the MBIE guidance document) as to what such provisions would seek to achieve. This may present issues of natural justice if additional provisions to address liquefaction and landslide hazards were to be recommended for inclusion.
119. A more appropriate process would be to initiate a separate variation (or future plan change) which would enable appropriate provisions to be developed and based on sufficient technical assessment, and for those provisions to be subject to cost-benefit analysis and public scrutiny through the section 32 and Schedule 1 process.
120. As such, I consider that there is insufficient evidence on which to base appropriate provisions within the PDP to address liquefaction and landslide hazards, and doing so through Variation 1 in response to the submission from Toka Tū Ake EQC [OS37.3 and OS37.5] may present issues of natural justice. Therefore, while there may be merit in the submitter’s request, I do not recommend any amendments to the PDP.

² Ministry of Business, Innovation and Employment (MBIE), 2017, Planning and engineering guidance for potentially liquefaction-prone land: Resource Management Act and Building Act aspects. Available from <https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/planning-engineering-liquefaction.pdf>

3.5.3 Summary of recommendations

121. I recommend for the reasons given in the assessment, that the submissions from Toka Tū Ake EQC [OS37.3 and OS37.5] be **rejected**.
122. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.6 Subdivision

3.6.1 PDP Submissions

3.6.1.1 SUB-O2

3.6.1.1.1 Matters raised by submitters

123. WELL [85.34] seeks that the objective is amended to include all infrastructure.
124. Porirua City Council [11.57] seeks that the objective is amended to remove the focus on the 'sufficient capacity' of the three waters network and instead refer to Council standards.

3.6.1.1.2 Assessment

125. I agree with WELL [85.34] that the objective should be broadened to include other types of infrastructure. Currently the objective only includes reference to the three waters network.
126. Policy 7 of the RPS requires district plans to include policies and/or methods that recognise the benefits of regionally significant infrastructure, with sub-clauses (a)(i) to (iv) setting out a range of relevant infrastructure services. SUB-P5 includes reference to the three waters network, as well as telecommunication and power supply infrastructure. Similarly, the standards require provision of three waters, telecommunication and electricity infrastructure. Therefore, there appears to be a gap at the objective level for reference to other infrastructure (noting that SUB-O1-3 and SUB-P4 address the transport network).
127. As such, I consider that SUB-O2 should be amended to refer to subdivisions being 'appropriately serviced by infrastructure'. This additional wording will provide a link to the requirements for infrastructure set out in SUB-P5, which further articulates what is meant by 'appropriate' including it being 'integrated and comprehensive', and also includes reference to telecommunications and power supply along with reticulated wastewater, reticulated water and stormwater management systems.
128. For similar reasons, I also agree with the submission from Porirua City Council [11.57]. Removing the wording for 'sufficient capacity' of the three waters network and instead referring to Council standards is consistent with the supporting policies and provides a clearer objective. However, I consider that the wording proposed in the relief sought can be further refined to be clearer, particularly through the use of subclauses to address the different outcomes sought for urban and non-urban zones, and the retention of the phrase 'to accommodate any proposed or anticipated development' in relation to the Three Waters Network in urban zones as this links to the outcome sought in FC-O1.
129. Additionally, I note that the objective should refer to the infrastructure servicing allotments, consistent with the heading of the objective, and clauses in the relevant supporting policies.

3.6.1.1.3 Summary of recommendations

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

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

SUB-O2 Servicing of allotments

Subdivisions are appropriately serviced by infrastructure, including that:

1. In Urban Zones allotments are serviced by the Three Waters Network which meets Council standards and is designed with sufficient capacity to accommodate any proposed or anticipated development; and subdivisions
2. In non-urban areas allotments are able to be serviced through on-site measures.

131. I recommend that the submission from PCC [11.57] and WELL [85.34] be **accepted in part**.

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

3.6.1.1.4 Section 32AA evaluation

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

- They will broaden the scope of SUB-O2 to encompass all necessary supporting infrastructure, rather than the current focus on just the Three Waters Network. Consequently, the amendments better link to the relevant Strategic objective being FC-O1, as well as the corresponding policies giving effect to the objective. Additionally, the reference to Council standards better links to the wording of the relevant policy, being SUB-P5, as well as more clearly articulating the outcome sought to give effect to FC-O1. Therefore, the amended objective will result in better vertical integration of related provisions. Overall, therefore, I consider the amended objective is the most appropriate way to achieve the purpose of the RMA.
- The recommended amendments will not have any greater environmental, economic, social, and cultural costs than the notified provisions. However, there will be benefits from improved plan interpretation and more efficient plan administration.

3.6.1.2 SUB-P5

3.6.1.2.1 Matters raised by submitters

134. John Carrad [231.19], Pukerua Property Group Limited [242.8], and The Neil Group Limited and Gray Family [241.17] seek amendments for the policy to 'encourage' rather than 'require', allow for infrastructure to be 'provided for or funded' at the time of allotment creation rather than in place (clause one), prefacing clause two with the word 'generally' and including a sentence providing for alternative infrastructure solutions that meet 'similar levels of performance', and including wording in clause five that wireless solutions for telecommunication will be considered. The reasons stated are that the policy does not promote innovation or alternate means of infrastructure provision and would be improved with flexibility.

135. Kāinga Ora [81.444] seeks deletion of the reference to Wellington Water's Regional Water Standard May 2019, stating that the infrastructure, transport and three waters chapters manage the performance standards for infrastructure.
136. Survey + Spatial [72.13] identifies an issue in that the policy is used as assessment criteria for rules when standards are not met, which creates a circular situation as the standards refer to the same standards.

3.6.1.2.2 Assessment

137. I consider that the amendments sought by John Carrad [231.19], Pukerua Property Group Limited [242.8], and The Neil Group Limited and Gray Family [241.17] are not appropriate. The amendment sought to 'encourage' rather than 'require' infrastructure in an integrated and comprehensive manner would not give effect to strategic direction FC-O1. Allowing for infrastructure to be 'provided for or funded' at the time of allotment creation, rather than 'in place' as required by the policy, would not provide sufficient certainty that the infrastructure will be provided prior to development of the created allotments, and therefore would risk significant adverse effects from inappropriate development of those allotments. Similarly, prefacing clause two with the word 'generally' and including a sentence providing for alternative infrastructure solutions that meet 'similar levels of performance' would not provide sufficient certainty that the infrastructure provided would meet the standards required to ensure the Plan objectives will be met. Including wording in clause five that wireless solutions for telecommunication will be considered is superfluous, as the type of telecommunication network is not otherwise specified in the policy.
138. In relation to the submission from Kāinga Ora [81.444], the submitter is incorrect, as the INF-Infrastructure chapter does not include performance criteria for three water infrastructure, but controls the effects of the provision of this infrastructure. Similarly, the THWT-Three Waters chapter requires buildings to connect to the three waters network, while the SUB – Subdivision chapter requires these networks to be provided to the boundary of new allotments. Therefore, the chapters all address separate issues, and the amendment sought by the submitter is not appropriate.
139. The issue identified in the submission from Survey + Spatial [72.13] is not valid, as non-compliance with the relevant standards for water supply, wastewater and stormwater becomes a restricted discretionary activity, with associated matters of discretion stated in the standards. These in turn refer to THWT-P3, which refers to the performance criteria in the Wellington Water Regional Standard for Water Services May 2019. Alternative designs that meet these performance criteria and address the other relevant matters in the matters of discretion can therefore be provided for through resource consent applications.

3.6.1.2.3 Summary of recommendations

140. I recommend for the reasons given in the assessment, that the submission from Survey + Spatial [72.13], John Carrad [231.19], Pukerua Property Group Limited [242.8], The Neil Group Limited and Gray Family [241.17], Kāinga Ora [81.444] and Survey + Spatial [72.13] be **rejected**.
141. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.6.1.3 SUB-S1

3.6.1.3.1 Matters raised by submitters

142. Three submissions raised matters relating to the minimum allotment size requirements set out in standard SUB-S1 and the associated table SUB-Table 1 that were deferred from Hearing Stream 5, being the following:

- PCC [11.62] seeks that the wording of the standard and the table be amended to shift the requirement for the minimum shape factor to be clear of specified areas to the standard itself rather than the table, and for the new standard clause to include infrastructure and other easements;
- Survey + Spatial [72.11] seeks the minimum allotment size and shape factors set out in SUB-Table 1 should be reduced to 300 square metres and 8 metres by 12 metres respectively for the GRZ, and 200 square metres and 8 metres by 10 metres respectively for the MRZ. The submitter states that this should be done to encourage a greater level of development consistent with the NPS-UD; and
- KLP [59.10] seeks the minimum allotment size and shape factors set out in SUB-Table 1 be reduced to 250 square metres and 7 metres by 15 metres respectively for the MRZ. The submitter notes that the standards are not conducive to good medium density design, with many medium density dwellings being long and narrow. The submitter questions the need for a minimum allotment size, with the requirement being the need to accommodate dwellings that meet the other standards for residential units in the zone.

3.6.1.3.2 Assessment

143. In relation to the submission from PCC [11.62], I agree that the standard would be clearer and more easily interpreted if the requirements for the shape factor rectangles were to be set out within a new clause under SUB-S1.

144. The submission from Survey + Spatial New Zealand [72.11] seeks smaller minimum allotment size and shape for both GRZ and MRZ zones. The justification for the minimum lot sizes is set out in detail in the Section 32 Evaluation Report Part 2 – Subdivision. The primary reason given for the minimum allotment size is that these are of a sufficient size to accommodate a permitted residential unit. The amendments proposed through Variation 1 will ensure that the PDP gives effect to the NPS-UD. I note that the reference to GRZ in SUB-Table 1 is proposed to be deleted, while reference to the proposed new HRZ is proposed to be added through Variation 1. I do not consider that any further amendments are required to the minimum allotment size in SUB-Table 1 to give effect to the NPS-UD.

145. The matters raised by KLP [59.10] are addressed by the rule and standards framework in the PDP, which provides for residential development of more than three dwellings per site within the MRZ as a restricted discretionary activity under MRZ-R1-2. Additionally, subdivision of land around existing lawfully established buildings or buildings approved or part of a resource consent application, where no vacant allotments are created, is provided for under SUB-R4 in the SUB – Subdivision chapter as a controlled activity, where the standards are met. The standards under SUB-R4, importantly, do not include SUB-S1.

146. Therefore, within this framework, applicants are able to design multi-unit residential developments which do not comply with the minimum allotment size or shape requirements under SUB-S1 but within which the resulting residential units will still be contained within

separate allotments, without being elevated to a fully discretionary activity status. The residential developments will be subject to assessment against the Medium Density Residential Design Guide under MRZ-R1 and RESZ-P10. I therefore consider that this framework provides for good medium density residential design, without placing unnecessary restrictions through subdivision requirements.

3.6.1.3.3 *Summary of recommendations*

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

- a. **Amend** standard SUB-S1 and associated table SUB-Table 1 as set out in Appendix A;

Note: the amendments are not reproduced here due to length.

148. I recommend that the submission from PCC [11.62] be **accepted**.

149. I recommend that the submissions from Survey + Spatial New Zealand [72.11] and KLP [59.10] be **rejected**.

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

3.6.1.4 *Section 32AA evaluation*

151. In my opinion, the amendments to SUB-S1 and SUB-Table 1 are more appropriate in achieving the objectives of the PDP than the notified provisions. In particular, I consider that:

- They will more clearly set out the requirements for the location of shape factor rectangles within a proposed allotment, particularly in relation to protection of easements and infrastructure. Consequently, they will better ensure that new allotments are able to contain a complying residential unit, and are more efficient and effective than the notified provisions in achieving the objectives of the PDP, particularly SUB-O1.
- The recommended amendments will not have any greater environmental, social, or cultural costs than the notified provisions. There may be some economic costs for developers through requiring slightly more land to ensure that compliance with the shape factors can be achieved, taking into account clearance from infrastructure. I consider that these costs will be relatively minor, as good practice development would already seek to achieve this outcome. However, there will be also benefits from improved plan interpretation and more efficient plan administration, and therefore may result in some positive economic effects for plan users. Additionally, there will be economic benefits gained by subsequent landowners through more appropriate allotment design with fewer development complexities.

3.6.2 *Variation 1 Submissions*

3.6.2.1 *Matters raised by submitters*

152. GWRC [OS74.19, OS74.20, OS74.25, OS74.65 and OS74.66] seeks:

- Amend SUB-O2 to include all infrastructure;
- Amend SUB polices to be more explicit about minimising reliance on private cars, and sequencing of all infrastructure including public transport; and

- A policy be added that requires the provision of infrastructure in subdivision development that supports modal shift and consideration of how design can reduce greenhouse gas emissions; and
 - Include direction to provide for de-centralised wastewater re-use and treatment of grey and black water and disposal using alternative wastewater systems (but not septic tanks) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required; and
 - Amend wording of clause two in SUB-S5 to delete 'a septic tank or soakage field' and to provide for the possibility of de-centralised wastewater re-use and treatment (of grey and black water) and disposal using alternative approved wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections aren't available.
153. In relation to [OS74.19, OS74.20 and OS74.25] the stated reasons include the need to have regard to Proposed Change 1 direction in providing for urban intensification and development and refers to Policies CC.1, CC.2, CC.3, CC.9, CC.10, 7, 57, and 58.
154. In relation to [OS74.65 and OS74.66] the reasons include that septic tanks have known issues with leakage of untreated wastewater and nitrates, particularly when poorly maintained; alternative wastewater treatment options often reduce potable water use significantly, and; reducing the pressure of new development on the wastewater network may also make intensification in some areas with existing network capacity constraints more feasible. Relevant direction from the operative RPS includes Policies 16 and 45. Relevant direction from Proposed RPS Change 1 includes Policies FW.2, FW.3 and FW.5, CC.14 and 42(r), FW.5 and 58.
155. Kāinga Ora [OS76.87, OS76.91 and OS76.92] seeks:
- Correction to SUB-P6 to refer to the HRZ rather than the GRZ;
 - A non-notification clause for SUB-R4-1 for both public and limited notification;
 - Deletion of the minimum allotment sizes in SUB-S1 for MRZ and HRZ; and
 - Amendment of the shape factor in SUB-S1 for MRZ and HRZ from nine metres by 14 metres, to eight metres by 15 metres.
156. The stated reasons include; so that SUB-P6 reflects the updated residential zoning framework; achievement of the outcome anticipated by the RMA; the minimum shape factor is adequate, and; amendment of the shape factor would bring a degree of national consistency.
157. TROTR [OS114.44, OS114.45 and OS114.46], while not identifying specific amendments sought, states:
- Note that the way SUB-P1, SUB-P2 and SUB-P3 worded may disadvantage iwi by taking away the implementation of their self-determination spelled out in our Claims Act as returned land in Porirua.*
158. The reasons further explain that Te Rūnanga will be receiving land as part of its Claims Act. There is concern that the SUB – Subdivision policies may limit the use of that land.
159. TROTR [OS114.48 and OS114.50] state that:

SUB-P5 poses a significant caveat where infrastructure required for subdivision is integrated and comprehensive. However, the main purpose of this Policy is to make sure that we have the 'infrastructure', and subdivision provisions could give sensible judgements around when this is not the case.

SUB-P7 is at odds with FUZ chapter and zone. This Policy asks subdivision should be avoided if it results in certain situations and described clauses are already pressing issues for all Porirua.

160. TROTR [OS114.47 and OS114.49] seek:

- Amendment to SUB-P4 as it does not mention Climate Change and emissions reduction. No reasons are given; and
- Separate the Hongoeka Zone (Māori Purpose Zone) from SUB-P6. For the reasons that there are two zones mentioned in here, that does not necessarily align for the purpose of the SUBP6.

161. Transpower [OS53.11] seeks the inclusion of rule SUB-R15 in the IPI, subject to the relief sought in the submitter's submission to the PDP on rule SUB-R15.³ Transpower [OS53.10] seeks the retention of SUB-R4 subject to the relief sought in its submission to the PDP on SUB-R15 and its inclusion in the IPI.

162. Alwyn (Taffy) Parry [OS5.1] seeks amendment to allow subdivision of 139 Airlie Road, Plimmerton, to build a smaller home. The reasons provide specific context of the property

3.6.2.2 Assessment

163. In relation to the submission from GWRC [OS74.19] which seeks amendment of SUB-O2, while I generally agree that the objective would benefit from expansion of its focus from just the three waters network to encompass other infrastructure necessary to support subdivision, I note that SUB-O2 is not subject to any changes under Variation 1. Additionally, it addresses subdivision across the city, rather than just urban zones. As such, I consider that amendment as a result of this submission is likely to be outside of the scope of Variation 1. However, the outcome sought by the submitter is also sought by WELL [85.34] as assessed above, and I have recommended amendments to SUB-O2 in response to that submission.

164. In relation to the submission from GWRC [OS74.20 and OS74.25], I note that a number of the policies referred to in the submissions are not directly relevant to the relief sought by the submitter, for example Policy CC.10 relates to freight distribution centres and new industrial areas or similar activities.

165. However, in consideration of the general intent of the submission, I note that the SUB – Subdivision chapter policies include SUB-P4 which relates to the transport network. SUB-P4 is focused on the safe and efficient functioning of the transport network, and includes clauses relating to providing transport network connections within and between communities and providing for a variety of travel modes that reflect the purpose, character and amenity values of the zone, including walking, cycling and access to public transport. Additionally, the TR – Transport chapter addresses on-site transport infrastructure requirements, and includes at TR-

³ I note that this point is also reiterated in the last bullet point of [OS53.1]

P2-3 the promotion of the uptake and use of public and active transport modes. As such, I consider that the relevant policies within the PDP already sufficiently support modal shift.

166. In relation to the wider issue of reduction of greenhouse gas emissions, this is supported by the overall urban form and development enabled by the amendments proposed through Variation 1. This is discussed in greater detail through the Section 42A Officer's Report: Part A – Overarching. In summary, the amendments proposed enable greater density of urban development, particularly residential development, in areas close to public transport and supporting social infrastructure, thereby reducing reliance on private vehicles and greenhouse gas emissions while supporting use of public and active transport modes.
167. On the matter of sequencing of all infrastructure including public transport, I note that the regional council is the relevant authority for the provision of public transport, while the sequencing of infrastructure owned by the Porirua City Council is determined by the Long Term Plan process under the LGA.
168. Additionally, in relation to the submission points [OS74.65] and [OS74.66] from GWRC on decentralised wastewater systems, the PDP includes references to Wellington Water Regional Standard for Water Services May 2019. This provides a regionally consistent approach to wastewater services. If a decentralised system were to be proposed resulting in SUB-S5 not being complied with, it would be assessed through a consent process as a restricted discretionary activity. I consider that this is appropriate, as there are many factors that would need to be considered, including ongoing ownership and maintenance responsibilities. I do not consider that a controlled activity status would be sufficient as consent may need to be refused.
169. On the matter of the reference to septic tanks and soakage fields in SUB-S5, I note the Porirua City Council licences on-site wastewater systems, in addition to a resource consent required from GWRC. As such, I do not agree that the reference needs to be removed.
170. The Officers' Report: Part A – Overarching Report contains general commentary on the weighting, scope and implementation timing of Proposed Change 1. I agree with the assessment in that report and note that the general statements are applicable to the policies identified in GWRC [OS74.19, OS74.20, OS74.25, OS74.65 and OS74.66].
171. In relation to the submission from Kāinga Ora [OS76.91], the 'How the Plan Works' chapter states under 'General Approach' that

An application for resource consent for a controlled activity will be considered without public or limited notification or the need to obtain written approval from affected parties unless:

1. Otherwise specified by a rule applying to the particular activity; or

2. The Council decides that special circumstances exist under section 95A(4) of the RMA.

172. Therefore, the amendment sought by the submitter to SUB-R4-1 is unnecessary.
173. I consider that the amendments sought by Kāinga Ora [OS76.92] to SUB-S1 are not appropriate. The Section 32 Evaluation Report: Part 2 – Subdivision notes that the minimum allotment size in residential zones were set at a size sufficient to accommodate a permitted residential unit. While the submitter states that the shape factor alone would be sufficient to achieve the outcome anticipated by the Act, I consider that this may result in the creation of vacant allotments that are not of sufficient size to accommodate an appropriately sized residential unit.

174. However, I do agree with Kāinga Ora [OS76.87], as the amendments sought correct the reference to the relevant residential zones in SUB-P6, consistent with the wider amendments under Variation 1.
175. In relation to the minimum dimensions for the shape factor required under SUB-S1, while I acknowledge that the Auckland Unitary Plan (AUP) sets a shape factor of eight metres by 15 metres as sought by the submitter for most residential zones, I note that the HRZ is more comparable to the Residential - Terrace Housing and Apartment Buildings Zone which in the AUP requires a rectangle of 15 metres by 20 metres to be contained within the vacant site. As such, if 'a degree of national consistency' were to be achieved as sought by the submitter, I consider that it would be more appropriate to apply the 15 metres by 20 metres shape factor to the HRZ.
176. Additionally, I note that the AUP's 15 metres by 20 metres shape factor for the Residential - Terrace Housing and Apartment Buildings Zone results in an allotment size of at least 300 square metres, not counting any of the areas excluded under E38.8.1.1.⁴
177. I consider that the shape factors and minimum allotment sizes in the PDP as modified by Variation 1 provide greater flexibility while achieving usable vacant allotments within residential zones. As such, overall, I do not recommend any amendments to SUB-S1 in response to the submission from Kāinga Ora [OS76.91].
178. In relation to the submission from TROTR [OS114.44, OS114.45, OS114.46, OS114.48 and OS114.50], I note that no specific amendments have been sought. I also note that these submission points appear to be inconsistent with the submission received from TROTR in 2020, which noted general support for the SUB – Subdivision chapter. I also consider that there is insufficient information provided in the submissions to understand the outcome sought by TROTR in relation to the SUB – Submission chapter. In the absence of this information, I consider their submission points [OS114.44, OS114.45, OS114.46 and OS114.48] should not be accepted. Specifically in relation to [OS114.50] I disagree that SUB-P7 is at odds with the FUZ chapter, as it is in fact implementing the outcome sought by the chapter by ensuring the area is not compromised by inappropriate subdivision. TROTR may wish to provide further information on these points in advance of the hearing.
179. In relation to TROTR [OS114.47] I disagree that SUB-P4 requires amendment, as clause three specifically refers to providing for a variety of modes including walking, cycling and access to public transport. Additionally, in relation to [OS114.49], I disagree that SUB-P6 needs to be separated, as the requirement for allotments that provide for residential units aligns with the purpose of the Māori Purpose Zone (Hongoeka) as set out in MPZ-O1, in particular allowing Hongoeka whānau to maintain an ongoing relationship with their ancestral land.
180. In relation to the submission from Transpower [OS53.10 and OS53.11], Transpower's submission on the PDP was considered through previous hearing streams. In relation to whether SUB-R15 is a qualifying matter, I note that the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation states:

⁴ These areas include 1 percent AEP floodplains, coastal erosion hazard area, land subject to land instability, protected root zone of notable trees, natural and historic overlay areas, and yards. These matters are generally addressed through the SUB – Subdivision chapter rules and the requirement to identify a building platform.

where a rule or standard is proposing to amend or modify the MDRS, or the height or density of urban form requirements set out in policy 3, is it applied as a qualifying matter for the purposes of sections 771 and 770.

181. The relevant rules in the PDP applied as qualifying matters are listed in Table 1 in the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation. That table includes SUB-R15. As such, I consider that the outcome sought by the submitter is already achieved, and it is clear that a restricted discretionary activity status applies to subdivision within the National Grid Subdivision Corridor. While I have not recommended any amendments to SUB-R4, I note that Transpower's submission on that rule was subject to its submission on SUB-R15 being accepted.
182. In relation to the submission from Alwyn (Taffy) Parry [OS5.1], I do not consider it appropriate to include property specific provisions in the SUB – Subdivision chapter. Subdivision of the property should go through the normal consent process.

3.6.2.3 Summary of recommendations

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

- a. **Amend** SUB-P6 as set out below and in Appendix A;

SUB-P6	Subdivision in the Residential Zones and Māori Purpose Zone (Hongoeka)
--------	------------------------------------------------------------------------

Provide for vacant lot subdivision within the Medium Density Residential, General High Density Residential Zone and Māori Purpose Zone (Hongoeka) where it can be demonstrated that the proposed lots are able to accommodate a residential unit that is of a size, scale and location that is anticipated for the Zone.

184. I recommend that the submission from Kāinga Ora [OS76.87] be **accepted**.
185. I recommend that the submissions from GWRC [OS74.25] and Kāinga Ora [OS76.91 and OS76.92], TROTR [OS114.44, OS114.45, OS114.46, OS114.47, OS114.48, OS114.49 and OS114.50], Transpower [OS53.10 and OS53.11] and Alwyn (Taffy) Parry [OS5.1] be **rejected**.
186. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.6.2.4 Section 32AA evaluation

187. In my opinion, the amendments to SUB-P6 do not require a section 32AA evaluation, as they are correcting the reference to the relevant residential zones, consistent with the wider amendments under Variation 1.

3.7 Earthworks

3.7.1 Matters raised by submitters

188. Harbour Trust & Guardians of Pāuatahanui Inlet [OS32.26] seeks that excavation slopes should be limited to no more than 45 degrees, for the reason that the higher density proposals in Variation 1 pose considerable risks to properties, hillside stability, and transport systems.

3.7.2 Assessment

189. The EW – Earthworks chapter is not affected by Variation 1, and therefore this submission point could be considered to be not within the scope of the variation.
190. In any case, the existing standard in EW-S2-1.c limits earthworks to slopes of less than 34 degrees. This was based on expert geotechnical advice sought through the development of the PDP. As such, the existing PDP provisions already address the issues raised by the submitter.

3.7.3 Summary of recommendations

191. I recommend for the reasons given in the assessment, that the submission from Harbour Trust & Guardians of Pāuatahanui Inlet [OS32.26] be **rejected**.
192. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.8 Noise

3.8.1 Matters raised by submitters

193. The RVA [OS118.58, OS118.59 and OS118.60] seeks that:
- NOISE-R4 be amended to integrate consideration of noise matters on a case-by-case basis for retirement villages in Commercial and Mixed Use and Industrial Zones; and
 - NOISE-S5 and NOISE-S6 be amended to integrate consideration of individual site characteristics / circumstances.
194. The stated reasons include that indoor noise design level requirements need to be determined on a case-by-case basis, with consideration given to individual site characteristics and environments.

3.8.2 Assessment

195. Specific amendments sought by the RVA to the NOISE chapter provisions are not provided in the submission. As such the actual outcome sought from the RVA's submission is not entirely clear.
196. NOISE-R4 provides a permitted activity rule for retirement villages within Commercial and Mixed Use and Industrial Zones. The relevant standards (NOISE-S5 and NOISE-S6) set out a requirement for design of the building to achieve certain indoor noise levels, with a design certificate from a suitably qualified and experienced professional to be provided to show compliance. Where NOISE-S5 or NOISE-S6 are not met, resource consent is required as a restricted discretionary activity. The relevant matters of discretion are set out with the standards, which include existing screening, alternative technologies or materials, and evidence provided by an acoustic professional.
197. As such, it appears that the outcome sought by the RVA is already provided for through the existing provisions. That is, the consideration of individual site characteristics and circumstances on a case-by-case basis is achieved through the resource consent process.
198. The alternative approach would be to delete the specific indoor noise levels in the standards and rely on resource consent processes for all retirement village activities within the Commercial

and Mixed Use and Industrial Zones. While retirement village activities require resource consent within these zones under the relevant zone chapters, I consider that the inclusion of specific indoor noise level standards within the NOISE chapter provides clarity and certainty in relation to that aspect of proposed retirement village activities, and therefore cost and time benefits to applicants.

3.8.3 Summary of recommendations

199. I recommend for the reasons given in the assessment, that the submissions from RVA [OS118.58, OS118.59 and OS118.60] be **rejected**.
200. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.9 Infrastructure Capacity

3.9.1 Matters raised by submitters

201. Andrew Myers [OS1.2] seeks that, before any three storey dwellings in residential areas are built, the infrastructure in the area be upgraded to accommodate the new development for a period of no less than 30 years. Additionally, no impact to rates and taxes of existing properties is sought as a result of the infrastructure upgrade. The stated reasons include concerns that water pressure and public transport capacity may be insufficient, issues with mobile connectivity, and the costs associated with infrastructure upgrades.
202. Madeleine Waters [OS39.4] seeks that the capacity of current services needs to be considered in all new developments. The stated reasons include that when water is drawn for rural delivery the submitter loses water pressure and some houses lose their water supply completely, along with concerns around parking and existing infrastructure coping with new medium and high density zones.
203. The PRA [OS79.7] does not seek specific relief, but raises concerns about the overall capacity and quality of infrastructure in their area and its ability to handle projected growth. They state that much of the existing infrastructure in established areas being rezoned to MRZ or HRZ is already in need of renewal and will not cope with the increased load that intensification will bring.
204. Russell Morrison [OS91.1, OS91.2 and OS91.4] seeks:
 - Assurance that the existing wastewater system will be fixed by having its capacity enhanced, and that no connections from the Plimmerton Farms or Pukerua Bay developments will be made to the system before that has been achieved; and
 - Acknowledgement that the proposed northern developments have the potential to generate significant extra traffic that is likely to have considerable adverse effects on the existing character and amenity of other communities, and ensuring that those effects are not overlooked.
205. The stated reasons include reference to historic Environment Court proceedings regarding what was State Highway 1 (now State Highway 59), and the conclusions in the Integrated Transport Assessment (ITA) undertaken for the Northern Growth Development Area (NGDA).

206. James Hadley Bond [OS102.1, OS102.2, OS102.3 and OS102.4] does not seek specific relief, but raises concerns regarding the capacity of existing wastewater infrastructure, effects of the discharge of increased stormwater volumes, and demand for potable water, from intensification.
207. Brian Warburton [OS64.5] seeks amendments so that no buildings or structures are permitted on land within a 'Three-Waters' catchment that does not have sufficient infrastructure capacity to cater for the additional development. The reasons include concerns around the capacity of existing infrastructure, particularly wastewater, and the adequacy of the PDP provisions.
208. Melissa Story [OS101.3] does not seek specific relief, but raises concerns about effects on education facilities including overcrowding stating that 'Plimmerton School cannot house any more pupils', and raises the need for a new school.

3.9.2 Assessment

209. All of the submissions noted above raise concerns generally relating to the capacity of infrastructure to service increased development within the City, as well as potential flow on effects, such as effects on rates or environmental effects.
210. 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 states that:

Given the committed level of investment in the LTP, expected development contributions and infrastructure provided through developer agreements, current levels of service for infrastructure are expected to be maintained and, in some cases, improved in the long term.

211. The report 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.
212. Briefly, the PDP includes standards in the THWT – Three Waters and SUB – Subdivision chapters that require connections to reticulated services where these are available, and in relation to wastewater, stormwater and potable water, achievement of the levels of service set in the Wellington Water Regional Standard for Water Services May 2019. Where the relevant standards are not met, resource consent is required, which could be refused if the adverse effects of the proposal are unacceptable. The PCC Development Contributions Policy 2021 sets out the development contributions payable by developers on a per household unit equivalent (HUE) basis. Where the existing infrastructure does not have sufficient capacity and a proposal came forward which may place significant demand on the infrastructure, developer agreements provide a flexible mechanism to bring forward certain projects from the LTP required to service the development.
213. Generally, I consider that the approach to infrastructure planning described in the Section 32 Evaluation Report Part A: Overview to Section 32 Evaluation addresses the concerns raised in the submissions.
214. Specifically in relation to the submission from Andrew Myers [OS1.2] which raised concerns around mobile connectivity, this matter was addressed through Hearing Stream 4 in relation to a submission from the Telcos where I recommended an additional matter of discretion for buildings that exceed maximum height standards in the zone chapters. In relation to the same

submission point, I note that the capacity of public transport services is the responsibility of the GWRC through its public transport operational arm (Metlink).

215. In relation to the submission from Russell Morrison [OS91.1, OS91.2 and OS91.4], and specifically on the concerns raised around the potential for increased traffic due to development of the Northern Growth Area, these concerns are addressed through the provisions of the PDP for connections of sites to the transport network and high trip generating activities. TR-P1 in the TR – Transport chapter of the PDP, against which resource consents for high trip generating activities would be assessed, includes '[t]he effect of the proposed activity on the character and amenity values of the surrounding area'. However, I do note that vehicles being driven on a road are exempt from the provisions of the NOISE - Noise chapter in the PDP.
216. In relation to the submission from Melissa Story [OS101.3], this matter is addressed in relation to the NGDA in the Section 42A Officer's Report Part B – Northern Growth Development Area. In summary, the planning and building of education facilities is the responsibility of the Ministry of Education. While integration of urban development with supporting community facilities is important and the Council seeks to work with service providers, the district plan cannot direct the development of education facilities.

3.9.3 Summary of recommendations

217. I recommend for the reasons given in the assessment, that the submissions from Andrew Myers [OS1.2], Madeleine Waters [OS39.4], Plimmerton Residents' Association [OS79.7], Russell Morrison [OS91.1, OS91.2 and OS91.4], James Hadley Bond [OS102.1, OS102.2, OS102.3 and OS102.4], Brian Warburton [OS64.5] and Melissa Story [OS101.3] be **rejected**.
218. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.10 Definitions

3.10.1 Geotechnical bore

3.10.1.1 Matters raised by submitters

219. Firstgas [84.35] seeks a new definition of geotechnical bore. The stated reasons are that this would be the most efficient and effective method of enabling temporary earthwork related activities

3.10.1.2 Assessment

220. I note that in the Officer's Report: Part B – Earthworks in Hearing Stream 4, I recommended that an exemption from EW-S2 be included, which included:

Earthworks for the construction, alteration or decommissioning of bores, including geotechnical investigation and monitoring bores, undertaken in accordance with NZS 4411:2001 Environmental Standard for Drilling of Soil and Rock

221. I consider that the inclusion of the exemption achieves the outcome sought by Firstgas. Additionally, I consider that the reference to NZS 4411:2001 means that a definition of 'geotechnical bore' within the PDP is unnecessary.

3.10.1.3 Summary of recommendations

222. I recommend for the reasons given in the assessment, that the submission from Firstgas [84.35] be **rejected**.

3.11 Minor Errors

223. I recommend that an amendment be made to the THWT – Three Waters chapter to fix an issue created by the proposed deletion of the definition of 'multi-unit housing'. The deletion of the definition means that the use of the term in THWT-R5 results in ambiguity as to what the rule applies to. I recommend the rule is amended to include the wording from the definition, which will ensure that the rule is applied as intended when the PDP was notified. This amendment could have been made after PDP was notified through the RMA process to correct minor errors⁵, but I recommend the amendment is made as part of the Hearing Panel's recommendations for completeness and clarity. The amendment is set out in Appendix A.

⁵ Clause 16 of RMA Schedule 1

4 Conclusions


224. Submissions have been received in support of and in opposition to the PDP and Variation 1 provisions in the district-wide chapters.
225. 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 Appendix A of this report.
226. 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 Chapters

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~~.

INF – Infrastructure

INF-S3	Height – Masts, antennas, lines and single pole support structures, anemometers and extreme weather devices (not regulated by the NESTF)	
<p>Local Centre Zone</p> <p>Mixed Use Zone</p> <p>Neighbourhood Centre Zone</p> <p>Metropolitan Centre Zone</p> <p>Residential Zones</p> <p>Hospital Zone</p>	<p>1. It must not exceed a maximum height above ground level of 3.5m above the maximum height of structures for the underlying zone (single provider).</p> <p>2. It must not exceed a maximum height above ground level of 5m above the maximum height of structures for the underlying zone (two or more providers).</p> <p><u>This standard does not apply to lightning rods.⁶</u></p>	<p>Matters of discretion are restricted to: [...]</p>
<p>General Industrial Zone</p> <p>Large Format Retail Zone</p>	<p>3. It must not exceed a maximum height above ground level of 25m (single provider).</p> <p>4. It must not exceed a maximum height above ground level of 30m (two or more providers).</p> <p><u>This standard does not apply to lightning rods.⁷</u></p>	<p>Matters of discretion are restricted to: [...]</p>
<p>Special Purpose Zone (BRANZ)</p>	<p>5. It must not exceed a maximum height above ground level of 15m (single provider).</p> <p>6. It must not exceed a maximum height above ground level of 18m (two or more providers).</p> <p><u>This standard does not apply to lightning rods.⁸</u></p>	<p>Matters of discretion are restricted to: [...]</p>

⁶ Spark New Zealand Trading Limited and Vodafone New Zealand Ltd [OS33.1]

⁷ Ibid

⁸ Ibid

Open Space and Recreation Zones	<p>7. It must not exceed a maximum height above ground level of 12m (single provider).</p> <p>8. It must not exceed a maximum height above ground level of 15m (two or more providers).</p> <p><u>This standard does not apply to lightning rods.⁹</u></p>	Matters of discretion are restricted to: [...]
Rural Zones Future Urban Zone Māori Purpose Zone (Hongoeka)	<p>9. It must not exceed a maximum height above ground level of 25m (single provider).</p> <p>10. It must not exceed a maximum height above ground level of 30m (two or more providers).</p> <p><u>This standard does not apply to lightning rods.¹⁰</u></p>	Matters of discretion are restricted to: [...]

THWT - Three Waters

THWT-R5 **Connection of non-residential buildings, retirement villages, papakāinga, and multi-unit housing residential development that will result in three or more residential units on any site¹¹ to the Three Waters Network**

	Residential Zones	1. Activity status: Permitted
	Māori Purpose Zone (Hongoeka)	<p>Where:</p> <p>a. The building(s) is connected to the reticulated water supply, reticulated wastewater and stormwater management networks; and</p> <p>b. Compliance is achieved with the following:</p>
	Settlement Zone	<p>a. For stormwater — The level of service in Chapter 4 Stormwater Table 4.1, Table 4.2 and 4.3 of the Wellington Water Regional Standard for Water Services May 2019;</p>

⁹ Spark New Zealand Trading Limited and Vodafone New Zealand Ltd [OS33.1]

¹⁰ Ibid

¹¹ Clause 16

- b. For wastewater — The level of service in Chapter 5, section 5.2.3 of the Wellington Water Regional Standard for Water Services May 2019; and
- c. For water supply — The level of service in Chapter 6, Tables 6.1 and 6.2 of the Wellington Water Regional Standard for Water Services May 2019.

Note:

1. Where a development relies on site specific measures to achieve compliance with the performance standards (for example an engineered wetland, on-site detention, booster pumps, or wastewater detention), that has already been approved and constructed (for example as part of a subdivision) and is considered fit for purpose, then this rule can be considered to be complied with.
2. This rule only applies to sites in the Māori Purpose Zone (Hongoeka) that are serviced by the three waters network.

Residential Zones

Māori Purpose Zone (Hongoeka)

Settlement Zone

2. Activity status: **Restricted discretionary**

Where:

- Compliance is not achieved with THWT-R5-1.a or THWT-R5-1.b.

Matters of discretion are restricted to:

- a. The matters in THWT-P3.

SUB – Subdivision

[...]

SUB-O2 Servicing of allotments

Subdivisions are appropriately serviced by infrastructure¹², including that:

1. in Urban Zones allotments are serviced by the Three Waters Network which meets Council standards and is designed with sufficient capacity to accommodate any proposed or anticipated development; and subdivisions
2. in non-urban areas allotments are able to be serviced through on-site measures.¹³

[...]

SUB-P6 Subdivision in the Residential Zones and Māori Purpose Zone (Hongoeka)

¹² WELL [85.34]

¹³ PCC [11.57]

Provide for vacant lot subdivision within the Medium Density Residential, [General High Density](#) Residential Zone and Māori Purpose Zone (Hongoeka) where it can be demonstrated that the proposed lots are able to accommodate a residential unit that is of a size, scale and location that is anticipated for the Zone.

[...]

Standards		
SUB-S1	Minimum allotment size and shape	
All zones	<p>1. All allotments created must comply with the minimum allotment size and allotment shape set out in SUB-Table 1.</p> <p><u>2. All minimum allotment shape rectangles required under SUB-S1-1 must be clear of any:</u></p> <p><u>a. Yards;</u> <u>b. Access allotments;</u> <u>c. Right-of-way easements;</u> <u>d. Infrastructure, including public and private infrastructure; and</u> <u>e. Other easements, including any new easement to be registered against the new allotment.</u></p> <p><u>Note: Easements will be required to be registered against new allotments containing public or shared infrastructure. Compliance with SUB-S1-2.d will be considered to be achieved where the minimum allotment shape rectangle is located outside of the area to be registered with an easement over this infrastructure.¹⁴</u></p>	There are no matters of discretion for this standard.
SUB-Table 1	Minimum allotment size and shape	
Zones	Minimum allotment size	Minimum allotment shape
General Rural Zone Future Urban Zone	All allotments created must have a minimum allotment size of 40ha.	n/a
Rural Lifestyle Zone	All allotments created must have a minimum allotment size of 2ha.	n/a

¹⁴ PCC [11.62]

Settlement Zone	All allotments created must have a minimum allotment size of 3000m ² with a 1ha minimum average allotment size being achieved across the site.	n/a
Industrial Zone	All allotments created must have a minimum allotment size of 1,000m ² .	n/a
General Residential Zone and Māori Purpose Zone (Hongoeka)	All vacant allotments created must have a minimum allotment size of 400m ² .	All vacant allotments must be able to contain a rectangle measuring 10m x 15m clear of any yards, access allotments and right-of-way. ¹⁵
Medium Density Residential Zone	All vacant allotments created must have a minimum allotment size of 300m ² .	All vacant allotments must be able to contain a rectangle measuring 9m x 14m clear of any yards, access allotments and right-of-way. ¹⁶
<u>High Density Residential Zone</u>	<u>All vacant allotments created must have a minimum allotment size of 300m².</u>	<u>All vacant allotments must be able to contain a rectangle measuring 9m x 14m.</u>
Other zones	n/a	n/a
All zones All allotments created for infrastructure	No minimum allotment size.	No minimum allotment shape.

¹⁵ Ibid¹⁶ Ibid

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 the PDP

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?	Deemed to be a submission against Variation 1 under Clause 16B?
SUB – Subdivision								
85.34	Wellington Electricity Lines Limited	SUB-O2	Seek that the following amendments are made to SUB-O2: Subdivisions in Urban Zones are serviced by the Three Waters Network Infrastructure with sufficient capacity to accommodate any proposed or anticipated development and subdivisions in non-urban areas are able to be serviced through on-site measures	3.6.1.1	Accept in part	See body of the report	Yes	No SUB-O2 is not proposed to be substituted for a provision in Variation 1
11.57 ¹⁷	Porirua City Council	SUB-O2	Amend the objective as follows: Subdivisions in Urban Zones are serviced by the Three Waters Network with sufficient capacity to accommodate any proposed or anticipated development where Council standards are met, and subdivisions in nonurban areas are able to be serviced through on-site measures.	3.6.1.1	Accept in part	See body of the report	Yes	No SUB-O2 is not proposed to be substituted for a provision in Variation 1
231.19 ¹⁸	John Carrad	SUB-P5	Amend Policy SUB-P5 to (or similar intent): Require <u>Encourage</u> infrastructure to be provided in an integrated and comprehensive manner by: 1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place, <u>provided for or funded</u> at the time of allotment creation; 3. <u>Generally</u> Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of the Wellington Water's Regional Water Standard May 2019. <u>Alternatives solutions for infrastructure will be supported where information is provided that proposals meet a similar level of performance.</u> 5. Ensuring telecommunications and power supply is provided to all allotments, <u>including consideration of wireless solutions for telecommunication.</u>	3.6.1.2	Reject	See body of the report	No	No SUB-P5 is not proposed to be substituted for a provision in Variation 1
242.8	Pukerua Property Group Limited	SUB-P5	Amend Policy SUB-P5 to (or similar intent): Require <u>Encourage</u> infrastructure to be provided in an integrated and comprehensive manner by: 1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place, <u>provided for or funded</u> at the time of allotment creation;	3.6.1.2	Reject	See body of the report	No	No SUB-P5 is not proposed to be substituted for a provision in Variation 1

¹⁷ Opposed in part by Kāinga Ora [FS65.255], and opposed by Kenepuru Limited Partnership (KLP) [FS20.42]

¹⁸ Opposed by Wellington Electricity Lines Limited [FS28.1]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?	Deemed to be a submission against Variation 1 under Clause 16B?
			<p>3. <u>Generally</u> Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of the Wellington Water's Regional Water Standard May 2019. <u>Alternatives solutions for infrastructure will be supported where information is provided that proposals meet a similar level of performance.</u></p> <p>5. Ensuring telecommunications and power supply is provided to all allotments, <u>including consideration of wireless solutions for telecommunication</u></p>					
241.17 ¹⁹	The Neil Group Limited and Gray Family	SUB-P5	<p>Amend Policy SUB-P5 to (or similar intent): <u>Require Encourage</u> infrastructure to be provided in an integrated and comprehensive manner by:</p> <p>1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place, <u>provided for or funded</u> at the time of allotment creation;</p> <p>3. <u>Generally</u> Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of the Wellington Water's Regional Water Standard May 2019. <u>Alternative solutions for infrastructure will be supported where information is provided that proposals meet a similar level of performance.</u></p> <p>5. Ensuring telecommunications and power supply is provided to all allotments, <u>including consideration of wireless solutions for telecommunication.</u></p>	3.6.1.2	Reject	See body of the report	No	No SUB-P5 is not proposed to be substituted for a provision in Variation 1
81.444 ²⁰	Kāinga Ora – Homes and Communities	SUB-P5	<p>Amend: Require infrastructure to be provided in an integrated and comprehensive manner by:</p> <p>1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place at the time of the allotment creation;</p> <p>2. Ensuring that subdivisions in Urban Zones, Settlement Zone and Māori Purpose Zone (Hongoeka) are hydraulically neutral;</p> <p>3. Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the</p>	3.6.1.2	Reject	See body of the report	No	No SUB-P5 is not proposed to be substituted for a provision in Variation 1

¹⁹ Opposed by Greater Wellington Regional Council [FS40.152]

²⁰ Opposed by Greater Wellington Regional Council [FS40.83] and Fire and Emergency New Zealand [FS54.34]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?	Deemed to be a submission against Variation 1 under Clause 16B?
			performance criteria of the Wellington Water's Regional Water Standard May 2019; 4. Where reticulated services are not available, ensuring allotments are of a sufficient size and shape with appropriate soil conditions to accommodate on-site wastewater, stormwater and water supply infrastructure, and that there is sufficient water supply capacity for firefighting purposes; and 5. Ensuring telecommunications and power supply is provided to all allotments.					
72.13 ²¹	Survey + Spatial New Zealand (Wellington Branch)	SUB-P5	Amend: Require infrastructure to be provided in an integrated and comprehensive manner by: 1. Ensuring infrastructure meets Council standards and has the capacity to accommodate the development or anticipated future development in accordance with the purpose of the zone, and is in place at the time of allotment creation; 2. Ensuring that subdivisions in Urban Zones, Settlement Zone and Maori Purpose Zone (Hongoeka) are hydraulically neutral; 3. Requiring reticulated wastewater, reticulated water and stormwater management systems in all Urban Zones to meet the performance criteria of to be assessed against the Wellington Water's Regional Water Standard May 2019; 4. Where reticulated services are not available, ensuring allotments are of a sufficient size and shape with appropriate soil conditions to accommodate on-site wastewater, stormwater and water supply infrastructure, and that there is sufficient water supply capacity for firefighting purposes; and 5. Ensuring telecommunications and power supply is provided to all allotments.	3.6.1.2	Reject	See body of the report	No	No SUB-P5 is not proposed to be substituted for a provision in Variation 1
72.11 ²²	Survey + Spatial New Zealand (Wellington Branch)	SUB-Table 1	For General Residential Zone: • The minimum lot area should be 300m ² ; • The minimum shape factor should be 8m x 12m. For Medium Density Residential Zone: • The minimum lot area should be 200m ² ; The minimum shape factor should be 8m x 10m.	3.6.1.3	Reject	See body of the report	No	Yes SUB-Table 1 is proposed to be substituted for a provision in Variation 1
FS68.1	Stanislav Vyskocil		<i>Supports the submission. Provides additional amendments sought to standard SUB-S1, noting that the required minimum allotment size is too large for GRZ and MRZ.</i>					

²¹ Supported by Kenepuru Limited Partnership (KLP) [FS20.45] and Kāinga Ora – Homes and Communities [FS65.261]; opposed by Fire and Emergency New Zealand [FS54.35]

²² Supported by BLAC Property [FS56.13] and Kāinga Ora – Homes and Communities [FS65.268]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?	Deemed to be a submission against Variation 1 under Clause 16B?
59.10	Kenepuru Limited Partnership (KLP)	SUB-S1	Amend the standard to: <ul style="list-style-type: none"> Remove min lot size in MDZ or reduce min area to 250m². Amend minimum rectangle to 15x7m.	3.6.1.3	Reject	See body of the report	No	Yes SUB-Table 1 is proposed to be substituted for a provision in Variation 1
FS68.3	Stanislav Vyskocil		<i>Supports the submission. Provides additional amendments sought to standard SUB-S1, noting that the required minimum allotment size is too large for GRZ and MRZ.</i>					
11.62 ²³	Porirua City Council	SUB-S1	Amend the policy as follows: SUB-S1 Minimum allotment size and shape 1. All allotments created must comply with the minimum allotment size and allotment shape set out in SUB-Table 1. 2. All minimum allotment shape rectangles required under SUB-S1-1 must be clear of any: a. <u>Yards;</u> b. <u>Access allotments;</u> c. <u>Right-of-way easements;</u> d. <u>Infrastructure, including public and private infrastructure;</u> <u>and</u> e. <u>Other easements, including any new easement to be registered against the new allotment.</u> <u>Note: Easements will be required to be registered against new allotments containing public or shared infrastructure. Compliance with SUB-S1-2.d will be considered to be achieved where the minimum allotment shape rectangle is located outside of the area to be registered with an easement over this infrastructure.</u> SUB-Table 1 Minimum allotment size and shape ... General Residential Zone and Maori Purpose Zone (Hongoeka) All vacant allotments must be able to contain a rectangle measuring 10m x 15m clear of any yards, access allotments and right-of-way. Medium Density Residential Zone All vacant allotments must be able to contain a rectangle measuring 9m x 14m clear of any yards, access allotments and right-of-way.	3.6.1.3	Accept	See body of the report	Yes	Yes SUB-Table 1 is proposed to be substituted for a provision in Variation 1
Definitions								
84.35	Firstgas Limited	New Definition	Add a geotechnical bore definition.	3.10.1	Reject	See body of the report	No	No

²³ Opposed by Kāinga Ora [FS65.267]

Table B 2: 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.

Further submitter Alan Collett [FS99] opposed original submissions 76. Further submitter Rebecca Davis [FS127] supported original submissions 11, 32, 58, 68, 79, 82, 111 and 114 and opposed original submissions 59 and 76.

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?
Infrastructure							
OS74.34	GWRC	New provision	Amend Variation 1 and Plan Change 19 as necessary to have regard to Proposed RPS Change 1 Policy CC.7 and Policy CC.12 as follows: Include policy that seeks nature-based solutions when providing for new infrastructure and in new developments, such as the use of green infrastructure.	3.2.1	Reject	See body of report	No
OS74.81	GWRC	New provision	Amend Variation 1 and Plan Change 19 as necessary to have regard to Proposed RPS Change 1 Policy CC.7 and Policy CC.12 as follows: Include policy that seeks nature-based solutions when providing for new infrastructure and in new developments, such as the use of green infrastructure.	3.2.1	Reject	See body of report	No
OS74.82	GWRC	New provision	Amend Variation 1 and Plan Change 19 as necessary to have regard to Proposed RPS Change 1 Policy CC.7 and Policy CC.12 as follows: Permit the development of green infrastructure in appropriate locations and subject to necessary controls, i.e., planting works undertaken by regional council.	3.2.1	Reject	See body of report	No
OS74.18	GWRC	INF-P1	Amend INF-P1 to reflect low and zero carbon regionally significant infrastructure	3.2.1	Reject	See body of report	No
OS33.1	Spark New Zealand Trading Limited and Vodafone New Zealand Ltd	INF-S3	Amend height limits in INF-S3, so that telecommunications facilities in all zones in this standard are permitted at a height of at least 5m above the maximum height of structures for the underlying zone. Clarification that the maximum height does not include lightning rods. Suggested amendments: <i>INF-S3 Height (excluding lightning rods from this height limit) – Masts, antennas, lines and single pole support structures, anemometers and extreme weather devices (not regulated by the NESTF)</i> <i>Local Centre Zone</i> <i>Mixed Use Zone</i> <i>Neighbourhood Centre Zone</i> <i>Metropolitan Centre Zone</i>	3.2.2	Accept in part	See body of report	Yes

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><i>Residential Zones</i> <i>Hospital Zone</i> 1. <i>It must not exceed a maximum height above ground level of 3.5m 5m above the maximum height of structures for the underlying zone. (single provider).</i></p> <p><i>2. It must not exceed a maximum height above ground level of 5m above the maximum height of structures for the underlying zone (two or more providers).</i> [...] <i>Large Format Retail Zone</i> 3. <i>It must not exceed a maximum height above ground level of 25m 27m (single provider).</i></p>				
Three Waters							
OS79.5 ²⁴	Plimmerton Residents' Association	General	<p>[Supports] The inclusion of the Three Waters chapter – especially the concept of hydraulic neutrality, and the requirement for mitigation where this cannot be met.</p> <p>Encouragement of developers to achieve hydraulic positivity in key risk areas where developments can actually improve an existing situation.</p>	3.3	Accept in part	See body of report	No
OS16.2	Andrew Wellum	General	<p>All new structures, and extensions to existing structures, required to install silt traps for all storm water and ground drainage. PCC to contract annual cleaning of silt traps, which is added to the annual rates of each property. Every 5th year, PCC or approved contractors, to test for integrity / additional and modified connections.</p> <p>All new structures, and extensions to existing structures, required to install storm water storage tanks of at least 500L, connected to each down pipe.</p> <p>All new structures, and extensions to existing structures, are not permitted to install external, mains connected taps. Only permitted external taps are those connected to storm water storage tanks and grey water storage tanks.</p> <p>All new structures, and extensions to existing structures, required to have metered water supply.</p>	3.3	Reject	See body of report	No

²⁴ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.90]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
			All new structures, and extensions to existing structures, are permitted to connect toilet cisterns to storm water storage tanks and grey water storage tanks.				
OS74.67 ²⁵	GWRC	General	<p>Include direction in the Three Waters chapter to provide for de-centralised wastewater re-use and treatment (of grey and black water) and disposal using alternative wastewater systems (but not septic tanks, due to their existing issues with contamination and leaching) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required.</p> <p>This includes any necessary consequential amendments to provide this direction.</p>	3.3	Reject	See body of report	No
Transport							
OS38.6	Amos Mann	General	Work closely with Waka Kotahi to make a more liveability-focused and climate-focused road and street network, especially where intensification is happening.	3.4	Accept in part	See body of report	No
OS38.10	Amos Mann	General	The new bicycle and micro-mobility device parking requirements for commercial and community facilities in the Centres and Mixed Use zones.	3.4	Accept in part	See body of report	No
OS83.13	Isabella G F Cawthorn	New provision	Add a standard requiring that developments adequately accommodate active travel for the building's users as the first-best choice for accessing it.	3.4	Reject	See body of report	No
OS104.7	Frances Cawthorn	New provision	Seeks a standard be added requiring that developments adequately accommodate active travel as the building users' first-best choice for accessing it, with universal accessibility as a non-negotiable.	3.4	Reject	See body of report	No
OS101.1	Melissa Story	General	Each dwelling should provide at least one car space for every two people living in the dwelling.	3.4	Reject	See body of report	No
OS88.7	Nash Alexander	General	<p>[Not specified, refer to original submission]</p> <p>While no specific decision sought, the submitter raised the following matter(s): <i>Additional comments – carpark</i> <i>Perhaps the most inimical idea that arises from the central planning idea of imposition of a free for all, is the quaint notion that people will not have cars, and we will all live in a utopia where public transport is easily accessible and available for everyone to use. That is simply not the case.</i></p>	3.4	Reject	See body of report	No

²⁵ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.51]

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><i>Notes that the requirement to provide carparks (is, or may be) removed when it comes to building a dwelling. This is problematic where there will be no driveways as the aim of developers will be to maximise site coverage with houses, not access.</i></p> <p><i>Submitter had two houses built next to them, where once there was one, on a street where it is on street carparking. There were no issues with carparks as generally, each house had 2 cars maximum. The houses were built (following a non-notified consent). Chaos ensued as the 2 new houses brought a further 6 cars to the street. We later found out that the 'evidence' that had been provided regarding on street carparking as not being an issue for an extra 2 houses had purported to show sufficient carparks because the photos had been taken during weekdays, around lunchtime, when obviously people were at work. Had we have been notified of the plan to build 2 houses, would have raised the issue of the on street carparking. Replicating that idiocy, across Porirua, will ensure many more cars parked on the street, and on the berms, and wherever people could generally find a spot to park their car.</i></p> <p><i>That is an issue that also needs to be realistically assessed and appraised. People will hardly ever go and do their weekly shop and bring it all back on public transport. Cars are (unfortunately) still required for many aspects of daily life in NZ. Any development that attempts to shoehorn in multiple units on a single site with little to no parking requirements is asking for ongoing issues as far as street parking is considered.</i></p>				
OS74.27	GWRC	General	Amend TR-S9 and/or TR-Table 6 to require EV or e-bike charging stations, including for residential development.	3.4	Reject	See body of report	No
OS74.29	GWRC	General	Amend TR-Table 7 to provide for thresholds for when consent applicants must prepare travel demand management plans (integrated transport assessments). The thresholds can be size of the subdivision, number of dwellings, people, floor size of retail development etc. It should apply to residential, education, office, industrial, community, entertainment and other land use activities that could generate higher private vehicle and freight travel.	3.4	Reject	See body of report	No
OS74.30	GWRC	General	Ensure that TR-R5 (3) includes a requirement that the travel demand management plan (integrated transport assessment) includes the measures to reduce reliance on private vehicles and encourage modal shift to low carbon, active or public transport options.	3.4	Reject	See body of report	No
Natural Hazards							

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS37.3 ²⁶	Toka Tū Ake EQC	Natural Hazards	Include liquefaction hazards in the Natural Hazards section and implement rules in the Natural Hazards, Subdivision, and Infrastructure chapters to restrict development in areas at high risk.	3.5	Reject	See body of report	No
OS37.5 ²⁷	Toka Tū Ake EQC	Natural Hazards	Include landslide hazards in the Natural Hazards section and implement rules in the Natural Hazards, Subdivision, and Infrastructure chapters to restrict development in areas at high risk.	3.5	Reject	See body of report	No
Subdivision							
OS55.1	Alwyn (Taffy) Parry	General	In relation to 139 Airlie Road, Plimmerton, seeks a change to the district plan to allow for subdivision of the section and to build a smaller home. [Refer to original submission for full decision requested, including attachments]	3.6.2	Reject	See body of report	No
OS74.65 ²⁸	GWRC	General	Include direction in the Subdivision chapter to provide for de-centralised wastewater re-use and treatment (of grey and black water) and disposal using alternative wastewater systems (but not septic tanks) anywhere where there are constraints on the existing network capacity, as well as where connections are not available. Where connections are available and there is network capacity, a connection to the wastewater network would still be required.	3.6.2	Reject	See body of report	No
OS74.19	GWRC	SUB-O2	Amend SUB-O2 to include all infrastructure (see proposed RPS Change 1 Policy 58)	3.6.2	Reject	See body of report	No
OS74.20	GWRC	General	Amend SUB- polices to be more explicit about minimising reliance on private cars, and sequencing of all infrastructure including public transport.	3.6.2	Reject	See body of report	No
OS74.25 ²⁹	GWRC	New Provision	Add a policy that requires the provision of infrastructure in subdivision development that supports modal shift and consideration of how design can reduce greenhouse gas emissions.	3.6.2	Reject	See body of report	No
OS114.44 ³⁰	TROTR	SUB-P1	Te Rūnanga identified a few issues to be addressed with this Chapter. Note that the way that SUB-P1, SUB-P2 and SUB-P3 worded may disadvantage iwi by taking away the implementation of their self-determination spelled out in our Claims Act as returned land in Porirua.	3.6.2	Reject	See body of report	No

²⁶ Opposed by Kāinga Ora [FS76.360]. Supported by Heriot Drive Ltd [FS123.3]

²⁷ Opposed by Kāinga Ora [FS76.362]. Supported by GWRC [FS74.92].

²⁸ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.49]

²⁹ Supported by Waka Kotahi [FS81.51]

³⁰ Supported by GWRC [FS74.171]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS114.45 ³¹	TROTR	SUB-P2	Te Rūnanga identified a few issues to be addressed with this Chapter. Note that the way that SUB-P1, SUB-P2 and SUB-P3 worded may disadvantage iwi by taking away the implementation of their self-determination spelled out in our Claims Act as returned land in Porirua.	3.6.2	Reject	See body of report	No
OS114.46 ³²	TROTR	SUB-P3	Te Rūnanga identified a few issues to be addressed with this Chapter. Note that the way that SUB-P1, SUB-P2 and SUB-P3 worded may disadvantage iwi by taking away the implementation of their self-determination spelled out in our Claims Act as returned land in Porirua.	3.6.2	Reject	See body of report	No
OS114.47 ³³	TROTR	SUB-P4	SUB-P4 does not mention Climate Change and emissions reduction. How is Subdivision supposed to contribute to the mitigation of climate change by only enabling and doing more of the same? Especially clause 1, 2 and 4 reflects more of our continued reliance on cars. This needs amendment.	3.6.2	Reject	See body of report	No
OS114.48	TROTR	SUB-P5	SUB-P5 poses a significant caveat where infrastructure required for subdivision is integrated and comprehensive. However, the main purpose of this Policy is to make sure that we have the 'infrastructure', and subdivision provisions could give sensible judgements around when this is not the case.	3.6.2	Reject	See body of report	No
OS114.49	TROTR	SUB-P6	Separate the Hongoeka Zone (Māori Purpose Zone) from SUB-P6.	3.6.2	Reject	See body of report	No
OS76.87	Kāinga Ora	SUB-P6	Amend: Provide for vacant lot subdivision within the Medium Density Residential, General <u>High Density</u> Residential Zone and Māori Purpose Zone (Hongoeka) where it can be demonstrated that the proposed lots are able to accommodate a residential unit that is of a size, scale and location that is anticipated for the Zone.	3.6.2	Accept	Agree with submitter	Yes
OS114.50	TROTR	SUB-P7	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>SUB-P7 is at odds with FUZ chapter and zone. This Policy asks subdivision should be avoided if it results in certain situations and described clauses are already pressing issues for all Porirua.</i>	3.6.2	Reject	See body of report	No
OS76.88	Kāinga Ora	SUB-R1	Retain as notified.	n/a	Accept	Agree with submitter	No
OS76.89	Kāinga Ora	SUB-R2	Retain as notified.	n/a	Accept	Agree with submitter	No
OS76.90	Kāinga Ora	SUB-R3	Retain as notified.	n/a	Accept	Agree with submitter	No
OS81.14	Waka Kotahi	SUB-R3	Retain as notified.	n/a	Accept	Agree with submitter	No

³¹ Supported by GWRC [FS74.172]

³² Supported by GWRC [FS74.173]

³³ Supported by GWRC [FS74.174]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS76.91	Kāinga Ora	SUB-R4	Amend: Introduce non-notification clause for SUB-R4 (1) for both public and limited notification.	3.6.2	Reject	See body of report	No
OS81.15	Waka Kotahi	SUB-R4	Retain as notified.	n/a	Accept	Agree with submitter	No
OS53.10	Transpower	SUB-R4-1	Seeks the retention of rule SUB-R4 subject to the relief sought in its submission to the PDP on rule SUB-R15 and its inclusion in the IPI.	3.6.2	Reject	See body of report	No
OS76.94	Kāinga Ora	SUB-R4-3	Supports the introduction of non-notification clauses for both public and limited notification for SUB-R4(3) and SUB-R4(4).	n/a	Accept	Agree with submitter	No
OS76.95	Kāinga Ora	SUB-R4-4	Supports the introduction of non-notification clauses for both public and limited notification for SUB-R4(3) and SUB-R4(4).	n/a	Accept	Agree with submitter	No
OS53.11 ³⁴	Transpower	SUB-R15	Seeks the inclusion of rule SUBR15 in the IPI, subject to the relief sought in the submitter's submission to the PDP on rule SUB-R15.	3.6.2	Reject	See body of report	No
OS76.92 ³⁵	Kāinga Ora	SUB-S1	Amend: Medium Density Residential Zone <ul style="list-style-type: none"> • All vacant allotments created must have a minimum allotment size of 300m². • All vacant allotments must be able to contain a rectangle measuring 9m x 14m <u>8m x 15m</u> clear of any yards, access allotments and right-of-way High Density Residential Zone <ul style="list-style-type: none"> • All vacant allotments created must have a minimum allotment size of 300m². • All vacant allotments must be able to contain a rectangle measuring 9m x 14m <u>8m x 15m</u> 	3.6.2	Reject	See body of report	No
OS74.66 ³⁶	GWRC	SUB-S5	Amend wording of clause 2 as follows: Where a connection to Council's reticulated wastewater systems is not available, all allotments must be provided with on-site wastewater systems a septic tank or soakage field or an approved alternative means to dispose of sewage in a sanitary manner'. Provide for the possibility of de-centralised wastewater re-use and treatment (of grey and black water) and disposal using alternative approved wastewater systems anywhere where there are constraints on the existing network capacity, as well as where connections aren't available.	3.6.2	Reject	See body of report	No

³⁴ Opposed by Kāinga Ora [FS76.365]

³⁵ Supported by Survey & Spatial [FS122.1]

³⁶ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.50]

Sub. Ref.	Submitter / Further Submitter	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS5.1	Alwyn (Taffy) Parry	Site specific	In relation to 139 Airlie Road, Plimmerton, seeks a change to the district plan to allow for subdivision of the section and to build a smaller home. [Refer to original submission for full decision requested, including attachments]	3.6.2	Reject	See body of report	No
Earthworks							
OS32.26	Harbour Trust & Guardians of Pāuatahanui Inlet	General	Excavation slopes should be limited to no more than 45 degrees.	3.7	Reject	See body of report	No
NOISE – Noise							
OS78.2	Oil companies	NOISE-R4	Support	n/a	Accept	No amendments are recommended to this chapter	No
OS118.58 ³⁷	Retirement Villages Association of New Zealand Incorporated	NOISE-R4	Amend NOISE-R4 to integrate consideration of noise matters on a case-by-case basis for retirement villages in Commercial and Mixed Use and Industrial Zones.	3.8	Reject	See body of report	No
OS78.3	Oil companies	NOISE-S5	Support	n/a	Accept	No amendments are recommended to this chapter	No
OS118.59 ³⁸	Retirement Villages Association of New Zealand Incorporated	NOISE-S5	Amend NOISE-S5 to integrate consideration of individual site characteristics / circumstances.	3.8	Reject	See body of report	No
OS78.4	Oil companies	NOISE-S6	Support	n/a	Accept	No amendments are recommended to this chapter	No
OS118.60 ³⁹	Retirement Villages Association of New Zealand Incorporated	NOISE-S6	Amend NOISE-S6 to integrate consideration of individual site characteristics / circumstances.	3.8	Reject	See body of report	No
Infrastructure Capacity							
OS1.2	Andrew Myers	General	Before any 3 storey dwellings in residential areas are built the infrastructure in the area has been upgraded to accommodate the new infrastructure for a period of no less than 30 years and has no impact to rates and taxes of existing properties.	3.9	Reject	See body of report	No
OS39.4	Madeleine Waters	General	In relation to High and Medium Density Residential Zones, seeks that the capacity of current services needs to be considered in all new developments.	3.9	Accept in part	See body of report	No
OS79.7	Plimmerton Residents' Association	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Concerns raised about the overall capacity and quality of infrastructure in our area and its ability to handle projected</i>	3.9	Accept in part	See body of report	No

³⁷ Supported by Ryman Healthcare Limited [FS67.60]

³⁸ Supported by Ryman Healthcare Limited [FS67.61]

³⁹ Supported by Ryman Healthcare Limited [FS67.62]

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>growth. Much of the existing infrastructure in established areas being rezoned to MRZ or HRZ is already in need of renewal and will not cope with the increased load that intensification will bring.</i>				
OS91.1	Russell Morrison	General	Submitter would like to see more surety from the PCC about how the existing wastewater system will be fixed by having its capacity enhanced and that no connections from the Plimmerton Farms or Pukerua Bay developments will be made to the system before that has been achieved.	3.9	Accept in part	See body of report	No
OS91.2	Russell Morrison	General	Submitter would like to see more surety from the PCC about how the existing wastewater system will be fixed by having its capacity enhanced and that no connections from the Plimmerton Farms or Pukerua Bay developments will be made to the system before that has been achieved.	3.9	Accept in part	See body of report	No
OS91.4	Russell Morrison	General	Submitter would like to see an acknowledgement that the proposed northern developments have the potential to generate significant extra traffic that is likely to have considerable adverse effects on the existing character and amenity of other communities (particularly Paremata); and ensuring that those effects are not overlooked in the scramble for new development in the north	3.9	Reject	See body of report	No
OS102.1	James Hadley Bond	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Not opposed to intensification within Porirua City but has concerns that mitigation for all potential failures/overloading of infrastructure will not be fully addressed, in an effort to reduce the cost of and speed up development. The wastewater plant is already operating beyond capacity unless it has been or is about to be modified. It is incapable of dealing with the enormous volume of infiltrating storm water. Another plant needs to be built and infiltration needs to be addressed urgently, even without residential and commercial intensification. The question then is where could a new plant be built? The existing plant was built with the planned prospect of duplication on it's western side. Also if a different site is chosen, where will the effluent be discharged?</i>	3.9	Reject	See body of report	No
OS102.2	James Hadley Bond	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Not opposed to intensification within Porirua City but has concerns that mitigation for all potential failures/overloading of infrastructure will not be fully addressed, in an effort to reduce the cost of and speed up development.</i>	3.9	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?
			<i>The existing main wastewater pump stations (City Centre and Tangare Drive) are currently incapable of coping during even moderate storms (again due to unaddressed stormwater infiltration) and are unlikely to be able to cope with dry weather flows from intensification. A lack of understanding of the total system is demonstrated by the current replacement of the trunk sewer through Bothamley Park without considering the volume of stormwater entering the system from housing above the park. Manholes are surcharging during moderate storms. The lack of capacity at the City Centre pump station which cannot cope causes a substantial discharge of wastewater into the Porirua Stream. Tanagre Drive Pump Station has perhaps a little more capacity. Suggests a solution could be to run a new line across the harbour from Whitford Brown to Tangare Drive so that this flow would bypass the City Centre, but this would mean a battle with Greater Wellington Regional Council. Another solution would be to use the existing line from Paremata Train Station to Onepoto (refurbished) and rearrange the valving at Onepoto and Tangare Drive to send the flow through the Tangare Drive pump station rather than the Onepoto pump station.</i>				
OS102.3	James Hadley Bond	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Not opposed to intensification within Porirua City but has concerns that mitigation for all potential failures/overloading of infrastructure will not be fully addressed, in an effort to reduce the cost of and speed up development. The discharge of stormwater. With the increase of roofing, paving and roading reducing the available land area for absorption of rain water, where will the collected water be allowed to exit? Will it add to the existing flood risk? Will it reduce the stability of the soils? Will it overflush existing waterways?</i>	3.9	Reject	See body of report	No
OS102.4	James Hadley Bond	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>Not opposed to intensification within Porirua City but has concerns that mitigation for all potential failures/overloading of infrastructure will not be fully addressed, in an effort to reduce the cost of and speed up development. The increased demand for potable water. Production of potable water in the Wellington region is almost at capacity now.</i>	3.9	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?
OS64.5	Brian Warburton	General	Seeks that the provisions of Variation 1 require amendment to the extent that no buildings or structures regardless of height or density shall be permitted on: a. land (whether or not it comprises an entire parcel) within a 'Three -Waters' catchment that does not have installed, operating and functional infrastructure, the capacity of which is sufficient to cater for the additional input (in the case of SW and WW) or demand (in the case of W), from additional development. [Refer to original submission for full decision requested, including attachments where relevant]	3.9	Reject	See body of report	No
OS101.3	Melissa Story	General	[Not specified, refer to original submission] While no specific decision sought, the submitter raised the following matter(s): <i>When the Aotea subdivision was in place, the local school Papakowhai encountered major issues of overcrowding. We must learn from the past and not repeat this mistake. Plimmerton School cannot house any more pupils. A new school will be required.</i>	3.9	Reject	See body of report	No
Other							
OS79.2 ⁴⁰	Plimmerton Residents' Association	SNAs	[Supports] The retention of SNAs to protect significant natural areas	n/a	Accept	SNAs are not proposed to be removed.	No

⁴⁰ Supported by Harbour Trust & Guardians of Pāuatahanui Inlet [FS32.89]

Appendix C. 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.