

OFFICER'S REPORT FOR:

Independent Hearing Commissioners:

Trevor Robinson (Chair)

Miria Pomare

David McMahon

Mark St Clair

Julia Williams

SUBJECT:

Proposed Porirua District Plan: FENZ and RNZ

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) on Variation 1 from Fire and Emergency New Zealand (FENZ) and Radio New Zealand (RNZ) in relation to the relevant objectives, policies, rules, definitions, appendices and maps of the Proposed Porirua District Plan (PDP). The report outlines recommendations in response to the issues that have emerged from these submissions.
2. The submissions from FENZ and RNZ raise a number of matters. The following are considered to be the key issues raised by FENZ and RNZ:
 - FENZ:
 - Provision for new fire stations in zone chapters;
 - Inclusion of functional and operational need as a consideration in zone policies;
 - Inclusion of provisions in zone chapters requiring provision of infrastructure, including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes;
 - Amending Commercial and Mixed Use and Industrial zone chapters height and height in relation to boundary standards to exempt fire station hose drying towers;
 - Amending zone chapter standards for fences and standalone walls to ensure they do not obscure emergency or safety signage or obstruct access to emergency response facilities;
 - Inclusion of matters of discretion in SUB-R17; and;
 - Amendments to NOISE chapter provisions to provide for noise from operational activities such as cleaning and maintaining equipment, training activities and emergency sirens.
 - RNZ:
 - Inclusion of a qualifying matter limiting height of buildings within certain distance of RNZ's AM radio transmitting mast to address health and safety and reverse sensitivity issues.
3. This report addresses each of these key issues, as well as any other issues raised by the submitters.
4. I have recommended some changes to the PDP provisions to address matters raised in submissions and are summarised below:
 - Amend the exemption for warning devices and sirens used by emergency services in the NOISE – Noise chapter to include training purposes as a Clause 6 minor amendment;
 - Amend NCZ-S1 to exempt hose drying towers to emergency services facilities;
 - Identification on the planning maps of 528 metre and 1,057 metre radii from the RNZ transmission mast, described as the Radio Transmission Height Control Area A and B;

- A new policy in the INF – Infrastructure chapter setting out matters to be considered for buildings and structures over 10-metres in height within the Radio Transmission Height Control Area; and
 - New rules in the MRZ, NCZ and an amendment to TEMP-R1 for buildings and structures in the Radio Transmission Height Control Area.
5. Having considered 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.
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
EMR	Electromagnetic Radiation
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
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
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
QEII	Queen Elizabeth the Second National Trust
RNZ	Radio New Zealand
RVA	Retirement Villages Association
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 Variation 1 from FENZ and RNZ 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 from FENZ and RNZ by the Council in relation to the relevant strategic objectives, objectives, policies, rules, definitions, appendices and maps 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 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.
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 F 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 Supporting Evidence

20. I have not used or relied upon any specific expert evidence, literature, legal cases or other material in support of the opinions expressed in this report.
21. However, as noted in the analysis of RNZ's submissions, I have relied upon the information provided by that submitter in relation to the matters raised.

1.4 Key Issues in Contention

22. I consider the following to be the key issues in contention as raised by FENZ and RNZ:
 - FENZ:
 - Provision for new fire stations in zone chapters;
 - Inclusion of functional and operational need as a consideration in zone policies;
 - Inclusion of provisions in zone chapters requiring provision of infrastructure, including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes;
 - Amending Commercial and Mixed Use and Industrial zone chapter height and height in relation to boundary standards to exempt fire station hose drying towers;
 - Amending zone chapter standards for fences and standalone walls to ensure they do not obscure emergency or safety signage or obstruct access to emergency response facilities;
 - Inclusion of matters of discretion in SUB-R17; and
 - Amendments to NOISE chapter provisions to provide for noise from operational activities such as cleaning and maintaining equipment, training activities and emergency sirens.
 - RNZ:
 - Inclusion of a qualifying matter limiting height of buildings within certain distance of RNZ's AM radio transmitting mast to address health and safety and reverse sensitivity issues.

23. I address each of these key issues in this report, as well as any other issues raised by submissions.

1.5 Procedural Matters

24. 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 the submissions from FENZ or RNZ.
25. However, informal meetings were held with Mr Stephen White, Transmission Engineer Specialist at RNZ, on 19 January 2023 and 3 February 2023. These meetings were to clarify understanding of the technical aspects of the matters raised in the RNZ submission.

2 Statutory Considerations

2.1 Resource Management Act 1991

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

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

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

2.3 National Policy Statements Gazetted since PDP Notification

2.3.1 National Policy Statement on Freshwater Management

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

2.3.2 National Policy Statement on Urban Development

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

2.3.3 National Policy Statement on Highly Productive Land

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

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

39. The NPS-HPL sets out requirements for territorial authorities to include objectives and policies in district plans for:
- Restricting urban rezoning of highly productive land;
 - Avoiding rezoning of highly productive land for rural lifestyle;
 - Avoiding subdivision of highly productive land;
 - Protecting highly productive land from inappropriate use and development;
 - Exemption for highly productive land subject to permanent or long-term constraints;
 - Continuation of existing activities;
 - Supporting appropriate productive use of highly productive land; and
 - Managing reverse sensitivity and cumulative effects;
40. The approach to the NPS-HPL 2022 is discussed in the Section 42A report Part A – Overview.

2.4 Proposed Change 1 to the RPS

41. 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.
42. The Section 42A report Part A – Overview provides a detailed discussion on the implications of Proposed Change 1 to the RPS to Variation 1 to the PDP and Plan Change 19 to the ODP.
43. 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

44. 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).

45. The required section 32AA evaluation for changes proposed as a result of consideration of the submissions is included in this report as required by s32AA(1)(d)(ii). The section 32AA evaluation for changes proposed as a result of consideration of the submissions from FENZ is contained within the assessment of the relief sought in submissions in section 3 of this report. The section 32AA evaluation for changes proposed as a result of consideration of the submissions from RNZ is appended to this report at Appendix D.

2.6 Trade Competition

46. Trade competition is not considered relevant to the submissions from FENZ and RNZ given their statutory responsibilities.
47. There are no known trade competition issues raised within the submissions.

3 Consideration of Submissions and Further Submissions

3.1 Overview

48. FENZ's Submission on Variation 1 included 122 submission points. Approximately 29 further submissions were received on these points, along with general support for all the points from one further submitter (Further Submitter 17).
49. RNZ's submission on Variation 1 included 16 submission points. Approximately eight further submissions were received on these points, along with general support for all the points from one further submitter (Further Submitter 17).
50. The matters raised by RNZ and FENZ are summarised in section 1.4 above.

3.1.1 Report Structure

51. The submissions from FENZ and RNZ 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.
52. 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.
53. 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.
54. 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 provisions with recommended amendments in response to submissions as Appendix A.
55. 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

56. 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
57. I have undertaken a separate section 32AA evaluation in respect to the recommended amendments relating to the submission from RNZ, which is attached at Appendix D.
58. The recommended amendments to the relevant chapters are set out in in Appendix A of this report where all text changes are shown in a consolidated manner.
59. 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];
 - 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.
60. In these cases, recommendations in relation to these further submissions reflect the recommendations on the relevant primary submission.

3.2 Fire and Emergency New Zealand

3.2.1 General

3.2.1.1 Matters raised by submitters

61. FENZ [OS58.1 and OS58.2] provides general information supporting the more specific relief sought through the submission.
62. Submission point [OS58.3] seeks that new fire stations are provided for in all zones as permitted, controlled or restricted discretionary activities with permitted standards appropriately recognising emergency services, such as through building height and access provisions which accommodate the requirements of fire stations. The reasons stated include that new fire stations may be necessary in order to continue to achieve emergency response time commitments in situations where development occurs, and populations change, and could conceivably be required in any of the urban zones within the district.

3.2.1.2 Assessment

63. In relation to submission points [OS58.1 and OS58.2], I do not challenge any of the information provided in these points and accept the general point of the importance of FENZ facilities, adequate firefighting water supply access, and access for firefighting appliances. This supports the strategic direction UFD-O7 for a well-functioning urban environment. However, I note that the more specific relief sought in the more detailed submission points is assessed in the sections below.
64. In relation to submission point [OS58.3], I note that emergency service facilities are provided for as restricted discretionary activities in all rural, residential, commercial and mixed use zones, and industrial zones. As such, the request for new fire stations to be provided for in all zones is largely already met through the existing PDP provisions. As addressed in the sections below relating to specific development standards, I consider that the height and height in relation to boundary standards in the Commercial and Mixed Use and Industrial chapters are generally appropriate to and do not require amendments to further provide for FENZ facilities, other than in relation to NCZ-S1. I also note that amendments to the height and height in relation to boundary standards sought by FENZ in the Residential zones are addressed in the Section 42A Officer's Report Part B – Residential Zones, Planning Maps and General Topics

3.2.1.3 Summary of recommendations

65. I recommend for the reasons given in the assessment, that the submission from FENZ [OS58.1, OS58.2 and OS58.3] be **accepted in part**.

3.2.2 Zone Chapter Policies

3.2.2.1 Matters raised by submitters

66. FENZ [OS58.47, OS58.55, OS58.64, OS58.72 and OS58.80] seeks that NCZ-P4, LCZ-P4, LFRZ-P4, MUZ-P4 and MCZ-P4 are amended to include an additional clause being '[t]here is a functional and operational need to locate in the area'. No specific reasons are given.

3.2.2.2 Assessment

67. I note that the submitter has not provided any specific or general reasons for the amendments sought to NCZ-P4, LCZ-P4, LFRZ-P4, MUZ-P4 and MCZ-P4 to include a new clause relating to functional and operational requirements to be located in the area. However, I note that the additional clause appears to replicate clause RESZ-P11-5 which relates to the residential zones.
68. All residential and commercial and mixed use zones enable emergency service facilities as restricted discretionary activities. The matters of discretion are restricted to RESZ-P11 in the case of residential zones, the relevant P4 policies in the case of commercial and mixed use zones, and GIZ-P2 in the GIZ. I note that in RESZ-P11 the clauses relating to management of adverse effects relate to any adverse effects, while in the commercial and mixed use zones the P4 policies refer to any 'significant' adverse effects being avoided, remedied or mitigated. Therefore, the additional clause is required in the residential zones to recognise the potential for emergency service facilities needing to be located in those areas, while in the commercial and mixed use zones the policy is more enabling and the additional clause is not required.

69. As such, because of the differences in the wording of the various policies, I consider that the PDP as modified through Variation 1 is already sufficiently enabling of emergency service facilities in the commercial and mixed use zones, and the additional clause sought is not necessary.

3.2.2.3 Summary of recommendations

70. I recommend for the reasons given in the assessment, that the submissions from FENZ [OS58.47, OS58.55, OS58.64, OS58.72, OS58.80] be **rejected**.

3.2.3 Zone Chapter Provisions for Infrastructure and Water Supply

3.2.3.1 Matters raised by submitters

71. FENZ [OS58.30, OS58.38, OS58.48, OS58.56, OS58.65, OS58.73, OS58.81 and OS58.87] seeks that a new objective is included in each of the HRZ, MRZ, NCZ, LCZ, LFRZ, MUZ, MCZ and GIZ zone chapters, being '[p]ublic health and safety is maintained through the appropriate provision of infrastructure'. No specific reasons are given (noting that these amendments may relate to the general comments assessed in section 3.2.1 above).
72. FENZ [OS58.31, OS58.39, OS58.49, OS58.57, OS58.66, OS58.74, OS58.82 and OS58.88] seeks that a new policy is included in each of the HRZ, MRZ, NCZ, LCZ, LFRZ, MUZ, MCZ and GIZ zone chapters, being '[e]nsure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes'.
73. The stated reasons for these amendments are to give better effect to the objective sought to be included, and that it provides a better policy framework for the new standard sought in this zone relating to the requirement to provide water supply.
74. FENZ [OS58.32, OS58.36, OS58.40, OS58.46, OS58.50, OS58.54, OS58.58, OS58.62, OS58.67, OS58.71, OS58.75, OS58.79, OS58.83, OS58.86, OS58.89 and OS58.93] seeks new subclauses in R1 rule in the HRZ, MRZ, NCZ, LCZ, LFRZ, MUZ, MCZ and GIZ zones, along with associated standards that require connection to a reticulated water supply system where one is available, and demonstration of an alternative and satisfactory water supply, including a firefighting water supply and access, if a reticulated system is not available. The stated reasons are that there will be cases where developments will not require subdivision consent, and therefore will not be subject to the water supply provisions of the SUB – Subdivision chapter.

3.2.3.2 Assessment

75. The matters raised by the submitter are already addressed by existing provisions in the PDP.
76. The submitter is correct that the provision of infrastructure for new subdivisions is addressed in the SUB – Subdivision chapter, which includes relevant objectives, policies and standards for allotments to be serviced by the Three Waters Network where those networks are available. In terms of water supply, I note that SUB-S4 requires compliance with the water supply requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 where a connection to Council's reticulated water supply systems is not available.
77. However, the submitter appears to have not identified that the provision of infrastructure for new land use activities is addressed through the THWT – Three Waters chapter of the PDP. That chapter includes objectives and policies for land use and development activities to connect to

the reticulated Three Waters Network, as well as rules and standards to give effect to those objectives and policies. The chapter refers to the Wellington Water Regional Standard for Water Services May 2019, which includes requirements for firefighting include reference to SNZ PAS 4509 Code of practice for firefighting water supplies.

78. As set out in the 'How the Plan Works' section of the PDP, the plan must be read as a whole. Including new objectives, policies, rules, and standards in the zone chapters relating to the provision of infrastructure, connection to the Three Waters Networks, and standards for firefighting water supply would result in unnecessary duplication of the provisions in the THWT – Three Waters chapter and would not be appropriate.

3.2.3.3 Summary of recommendations

79. I recommend for the reasons given in the assessment, that the submissions from FENZ [OS58.30, OS58.38, OS58.48, OS58.56, OS58.65, OS58.73, OS58.81, OS58.87, OS58.31, OS58.39, OS58.49, OS58.57, OS58.66, OS58.74, OS58.82 and OS58.88, OS58.32, OS58.36, OS58.40, OS58.46, OS58.50, OS58.54, OS58.58, OS58.62, OS58.67, OS58.71, OS58.75, OS58.79, OS58.83, OS58.86, OS58.89 and OS58.93] be **rejected**.
80. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.2.4 Height and HIRB Standards

3.2.4.1 Matters raised by submitters

81. FENZ [OS58.52, OS58.53, OS58.60, OS58.61, OS58.69, OS58.70, OS58.77, OS58.78, OS58.85, OS58.91] seeks that NCZ-S1, NCZ-S2, LCZ-S1, LCZ-S2, LFRZ-S1, LFRZ-S2, MUZ-S1, MUZ-S2, MCZ-S1 and GIZ-S1 are amended to include an exemption of the application of each standard to hose drying towers up to 15 metres in height. The submitter states that hose drying towers can be around 12 to 15 metres in height.

3.2.4.2 Assessment

82. In relation to the height standards (NCZ-S1, LCZ-S1, LFRZ-S1, MUZ-S1, MCZ-S1 and GIZ-S1) all of these standards except NCZ-S1 set a maximum height greater than 15 metres. As such, I do not consider that any amendments are required to LCZ-S1, LFRZ-S1, MUZ-S1, MCZ-S1 or GIZ-S1.
83. In relation to NCZ-S1, this standard sets a maximum height of 12 metres unless the site is subject to Height Increase A or B in which case the maximum height is 22 metres or 18 metres, respectively. Where NCZ-S1 is proposed to be breached, resource consent is required as a restricted discretionary activity, with the matters of discretion limited to those stated in NCZ-S1.
84. While noting that hose drying towers can be around 12 to 15 metres in height, the submitter does not provide information on the approximate plan area or horizontal dimensions of such towers. As such, where a tower is proposed to be constructed at the higher limit of these structures, there is potential for adverse effects on surrounding properties from exceedances of the maximum height by the towers.
85. The NCZ covers an area of approximately 5.66 hectares across the whole of the Porirua City territorial area which has a total land area of approximately 17,117.5 hectares. Height Increase A and B areas cover approximately 0.74 hectares of the LCZ. Therefore, there is only

approximately 4.92 hectares of LCZ land where the maximum height is 12 metres. This equates to approximately 0.29 percent of the total land area in Porirua. As such, the actual potential of the location of new FENZ facilities within LCZ is relatively low. Approximately 3.08 hectares of this land is within the new LCZ area proposed as part of the NGDA. The submitter has not provided any information on the likelihood of the need for new facilities withing the NGDA.

86. Due to the nature of the NCZ areas being located to provide accessible services for surrounding residential areas, the zone generally adjoins residential or open space zones. Of the seven LCZ areas which are not affected by Height Increase A or B, six are completely surrounded by MRZ, while one (the NGDA area) mostly adjoins MRZ and partially adjoins FUZ. As such, the adjoining properties would generally have a maximum height of 11 metres. However, a relevant exemption for hose drying towers is provided to the height limits in MRZ-S2, being:

Emergency service facilities and hose drying towers up to 15m, associated with emergency service facilities, except where the site is subject to a height control limit under MRZ-S2-1.c to MRZ-S2-1.h.

87. As such, I consider that it would be appropriate for a similar exemption to be applied to the height limits in NCZ-S1.
88. I note that LCZ-S1 and MUZ-S1 contain height limits for sites subject to Height Control – Heritage B. The submission points [OS58.52] and [OS58.78] are considered in Section 42A Officer's Report Part A – Overarching, in as far as the submissions relate to historic heritage or sites and areas of significance to Māori. That report also recommends the submissions be rejected.
89. In relation to the submission points on NCZ-S2, LCZ-S2, LFRZ-S2 and MUZ-S2 [OS58.53, OS58.61, OS58.70 and OS58.78], which are the zone standards for height in relation to boundary (HIRB), I note that the HIRB standard is dependent on the zoning of the adjoining sites. The HIRB do not apply to boundaries where the adjoining site is within a Commercial and Mixed Use zone, or a road boundary. The standard would require a 15 metre high tower to be set back between approximately 4.04 metres to 6.35 metres from the site boundary. Where this is proposed to be breached, resource consent is required as a restricted discretionary activity, with the matters of discretion limited to those stated in the relevant standard.
90. I consider that due to the potential for adverse effects from visual dominance and shading on residential sites, an exemption for drying towers on FENZ sites from the HIRB is not appropriate. I consider that the resource consent process for any new FENZ facilities that propose to breach the standard is more efficient and effective as the potential for such consents to be required is relatively low, given that the HIRB does not apply to boundaries with other Commercial and Mixed Use zoned sites or road boundaries.
91. I note that MUZ-S2 contains height limits for sites subject to Height Control – Heritage B. The submission point [OS58.58] is considered in Section 42A Officer's Report Part A – Overarching, in as far as the submission relates to Historic heritage or sites and areas of significance to Māori. That report also recommend the submissions be rejected.
92. For these reasons, I do not recommend any amendments to NCZ-S2, LCZ-S1, LCZ-S2, LFRZ-S1, LFRZ-S2, MUZ-S1, MUZ-S2, MCZ-S1 or GIZ-S1.

3.2.4.3 Summary of recommendations

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

- a. **Amend** NCZ-S1 to provide an exemption for hose drying towers, as set out below and in Appendix A:

NCZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of:

- a. 12m;
- b. 22m on sites subject to the Height Increase A identified on the planning maps; or
- c. 18m on sites subject to the Height Increase B identified on the planning maps.

Except that:

- Any fence or standalone wall along a side or rear boundary which adjoins a site zoned High Density Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone must not exceed 2m in height.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 1m;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m;
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do not exceed the height by more than 1m;
- Lift overruns provided these do not exceed the height by more than 1m.
- Hose drying towers associated with emergency service facilities provided these do not exceed a maximum height above ground level of 15m, except where the site is subject to a height control limit under NCZ-S1-1.b or NCZ-S1-1.c.

94. I recommend that the submissions from FENZ [OS58.52] be **accepted in accept**.
95. I recommend that the submissions from FENZ [OS58.53, OS58.60, OS58.61, OS58.69, OS58.70, OS58.77, OS58.78, OS58.85, OS58.91] be **rejected**.

3.2.5 Zone Chapter Standards for Fences and Standalone Walls

3.2.5.1 Matters raised by submitters

96. FENZ [OS58.35, OS58.45 and OS58.92] seeks that HRZ-S10, MRZ-S11 and GIZ-S6 be amended so that the phrase 'exceed a maximum height above ground level of' is deleted from clause one and added to each of the sub-clauses, and a new sub-clause is added that reads:

Obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.

97. The reasons stated are that it is important that the erection of fences and walls will not obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves or other emergency response facilities.

3.2.5.2 Assessment

98. In relation to the relocation of the phrase 'exceed a maximum height above ground level of', this appears to be seeking to duplicate the phrase in each of the sub-clauses. I consider that this provides no benefits for the readability of the PDP, while resulting in unnecessary additional length. As such, I do not consider that the amendment sought is necessary.
99. In relation to the new sub-clause sought, the requirements for access and safety for firefighting operations are set out in the Building Act 2004 and associated Building Code under Clause C Protection from Fire. If existing facilities required under the Building Code for a particular building were to be potentially made non-compliant by a new fence or standalone wall on the site, the onus would be on the building owner to ensure that the existing building remained compliant.
100. Additionally, I consider that the wording of the clause sought to be included is subjective, and would not be easily interpreted or implemented.
101. As such I do not consider that the amendments sought to HRZ-S10, MRZ-S11 and GIZ-S6 are appropriate.

3.2.5.3 Summary of recommendations

102. I recommend for the reasons given in the assessment, that the submissions from FENZ [OS58.35, OS58.45 and OS58.92] be **rejected**.

3.2.6 Subdivision

3.2.6.1 Matters raised by submitters

103. FENZ [OS58.21] seeks that SUB-R17 is amended to include two additional matters of discretion, being:

2. The ability for fire appliances to access the site

3. The provision of a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008.

104. The stated reasons include that it is important that subdivisions in all areas sufficiently consider these matters to ensure there is the ability to efficiently and effectively respond to emergencies on all sites with the district.
105. FENZ [OS58.16, OS58.17, OS58.18 and OS58.19] seeks that SUB-R10 SUB-R11 SUB-R12 and SUB-R14 be retained. The stated reasons include that the matters of control/discretion both include access for firefighting appliances, and the provision of water supply, including for firefighting purposes.

3.2.6.2 Assessment

106. The submitter appears to incorrectly believe that SUB-R17 includes a restricted discretionary activity rule. In fact, SUB-R17-1 makes subdivision in the GRUZ adjoining existing MRZ

settlements within the Coastal Environment a fully discretionary activity, which elevates to non-complying where SUB-R17-1.a or SUB-R17-1.b is not met.

107. Additionally, I note that while SUB-R17 is proposed to be amended through Variation 1 this was a consequential amendment to change the reference in the rule from GRZ to MRZ, consistent with the changes to the residential zoning proposed through Variation 1. As the rural environment itself is not subject to Variation 1 and SUB-R17 applies only to the GRUZ, the submission may not be considered to be 'on' the Variation.
108. As such, the addition of matters of discretion to the rule is neither necessary nor appropriate.
109. In relation to FENZ [OS58.16, OS58.17, OS58.18 and OS58.19] these rules are not subject to Variation 1.

3.2.6.3 Summary of recommendations

110. I recommend for the reasons given in the assessment, that the submissions from FENZ [OS58.16, OS58.17, OS58.18, OS58.19 and OS58.21] be **rejected**.

3.2.7 Noise

3.2.7.1 Matters raised by submitters

111. FENZ [OS58.22, OS58.23, OS58.24, OS58.25 and OS58.26] seeks that a new objective, two new policies, and a new rule are added to the NOISE – Noise chapter, and an associated definition is included in the Definitions section, as below:

NOISE-OX Where the locational, functional or operational needs are such that activities of importance to the community could not otherwise meet noise and vibration standards, enable these activities by allowing a whole or partial exemption, or relaxation, from those noise standards.

NOISE-PX To allow a marginal relaxation of noise standards, but not exceeding National Standards, where the noise generating activity is of importance to the safety of the community, such as the operation of emergency services.

NOISE-PX To allow noisy activities of limited duration and frequency which are of importance to the community, such as noise associated with the operation of emergency services and temporary military training activities, subject to appropriate controls.

NOISE -RX Noise from Emergency Services Facilities and Temporary Emergency Services Training Activities (All zones)

1. Activity status: Permitted

Where:

The noise source is a warning device or siren (including their routine testing and maintenance) associated with an Emergency Service Activity or Temporary Emergency Services Training Activity when measured within the site boundary of a receiving site, or within the notional boundary of rural dwellings or habitable buildings.

Temporary Emergency Services Training Activity means a temporary activity undertaken for the training of any component of FENZ New Zealand for any emergency purpose. An emergency purpose are those purposes which enable FENZ New Zealand to achieve its main functions under sections 11 and 12 of the FENZ New Zealand Act 2017.

112. The stated reasons include that the submitter's facilities may need to locate anywhere within the urban and rural environment and noise will be produced by operational activities such as cleaning and maintaining equipment, training activities and emergency sirens. The submitter considers that a fire station will be capable of meeting the standards set out in NZS 6802:2008 (Table 3 - Guideline residential upper noise limits), with the exception of noise created by emergency sirens, and that it is necessary that a new or amended rule makes an allowance for such essential activities within both urban and rural environments, within reasonable limits.

3.2.7.2 Assessment

113. The NOISE – Noise chapter introduction in the PDP as notified included a list of activities that are exempt from the rules and standards in the chapter. Relevantly, this includes:

Any warning device or siren used by emergency services for emergency purposes (and routine testing and maintenance);

114. I note that In the Council's Right of Reply for Hearing Stream 4, I recommended that the exemptions be moved from the chapter introduction to the permitted activity rule to address potential implementation issues.

115. I consider that the concern of FENZ relating to the generation of noise created by emergency sirens is already sufficiently addressed by the PDP through the exemption above, with the exception of noise from sirens used for training purposes.

116. I agree that training activities associated with emergency services are important for enabling people and communities to provide for their ongoing health and safety. The submitter states that training may take place anywhere between 7:00am and 10:00pm. I consider that noise from sirens used for training of personnel at FENZ facilities would generally be acceptable to and expected by the surrounding community. I also note that, given that the exemption already includes provision for noise generated from routine testing and maintenance, the addition of training activities would likely not appreciably increase the adverse effects of the use of such sirens.

117. As such, I consider that an amendment to the exemption, whether located in the chapter introduction or shifted to the permitted activity rule as recommended through Hearing Stream 4, would be appropriate to include the words 'or training', so that it reads '[a]ny warning device or siren used by emergency services for emergency or training purposes (and routine testing and maintenance)'.

118. However, I note that it is beyond the scope of Variation 1 to allow new district-wide noise provisions. It is arguable that the submission points above may be valid only to the extent that they apply to the urban environment.

119. I consider that the amendment to the exemption could be made as a minor amendment to the PDP under Clause 16 of Schedule 1. This is therefore addressed in section 3.4 below.

120. In relation to the new objective, policies, rule and definition sought by the submitter, I consider that these are unnecessary given the exemption noted above and the recommendation to include training activities. I note that the existing framework of the NOISE – Noise chapter already allows for resource consents to applied for and assessed against NOISE-P2, which includes consideration of a range of matters relevant to the effects of the proposed activities.

121. Additionally, in relation to the reference to 'temporary military training activities' in the policy sought by the submitter, those activities are addressed under the TEMP – Temporary Activities chapter. I note that, if any new provisions were to be included in the PDP to address emergency services training activities, I consider that the TEMP – Temporary Activities chapter would be a better option than the NOISE – Noise chapter, given the recognition in the existing objectives and policies of that chapter of the need for and benefits of such activities.

3.2.7.3 Summary of recommendations

122. I recommend for the reasons given in the assessment, that the submissions from FENZ [OS58.22, OS58.23, OS58.24, OS58.25 and OS58.26] be **rejected**.

3.3 Radio New Zealand

3.3.1 General and approach to intensification

3.3.1.1 Matters raised by submitters

123. RNZ [OS73.2, OS73.3 and OS73.4] seeks that regard is had to the submitter's facilities, as a lifeline utility, in a way that ensures the submitter can continue to undertake daily operations, maintenance and upgrades of its facilities as required, and ensure that the effects of electromagnetic radiation are understood and recognised through Variation 1.

3.3.1.2 Assessment

124. The site of the submitter's facilities is designated as RNZ-01. This enables the submitter to continue to undertake daily operations, maintenance and upgrades of its facilities. I do not consider that any further amendments to the PDP are required to enable these activities.

125. The submitter has requested that the effects of electromagnetic radiation are understood and recognised through the introduction of a qualifying matter for 'Radiocommunication Transmission' within certain distances from the submitter's facilities. The specific requests in relation to this matter are assessed in the sections below.

3.3.1.3 Summary of recommendations

126. I recommend for the reasons given in the assessment, that the submissions from RNZ [OS73.2, OS73.3 and OS73.4] be **accepted in part**.

3.3.2 Qualifying Matters

3.3.2.1 Matters raised by submitters

127. RNZ [OS73.1, OS73.16, OS73.5, OS73.6, OS73.7, OS73.8 and OS73.9] seeks that:

- Its facilities at Porirua are recognised as a 'qualifying matter';
- Unrestricted development to MDRS standards should be avoided within these areas as a matter of health and safety, as well as a matter of secure and efficient functioning of radiocommunications;

- Within 528 metres of the Porirua Site, there should be no structures above 10 metres in height;
 - Within 1,057 metres of the Porirua Site, the design of any structure above 10 metres in height must include a site-specific and construction materials-specific EMR assessment; and
 - A stronger policy framework is included to recognise the importance of qualifying matters and why they justify restrictions on MDRS.
128. The stated reasons include that inappropriate development within the radii has the potential for safety and reverse sensitivity effects, and that the MDRS standards allowing buildings up to 11 metres in height is inappropriate near the submitter's facilities. The submitter notes that height limits within the ODP and PDP (as notified in 2020) are limited to 10 metres. The wider reasons included in the submission include discussion of reverse sensitivity and management of electromagnetic radiation.

3.3.2.2 Assessment

3.3.2.2.1 Radio New Zealand Facilities

129. The submission from RNZ includes a brief outline of the submitter's facilities on Whitireia Peninsula. These facilities include a 137-metre guyed aerial mast which broadcasts AM radio. The approximate location of the mast is shown by the black dot on Figure 1 below.

3.3.2.2.2 Potential Adverse Effects

130. RNZ states in its submission in relation to risks from the design, construction and occupancy of buildings and structures near the transmission site, that it has been determined that:

*Structures greater than 10m in height within 528m of the mast **will most likely** result in EMR levels exceeding public limits. This raises the risk of shocks and/or burns from contact with large metallic objects, including temporary structures like cranes. This is a significant health and safety risk to workers and the public.*

*Structures greater than 10m in height between 528m and 1,057m of the mast **may** result in EMR levels exceeding public limits which again could result in shocks and/or burns from contact with large metallic objects.*

131. There is therefore the potential for health and safety risks associated with the development of sites within the radii specified by RNZ, as well as potential reverse sensitivity effects. This is further explained in the document attached at Attachment 3 to the submission from RNZ, entitled 'Constraints and Considerations for the Development of land around the RNZ Titahi Bay Transmission Site'. This identifies the risk of electromagnetic radiation (EMR) coupling, and associated health effects.
132. Additionally, further clarification was sought from RNZ on the risks associated with the transmission and buildings above 10 metres in height within the radii specified by RNZ.¹ This resulted in discussions between Mr Stephen White (RNZ Transmission Engineer Specialist) and the author on 19 January 2023 and 3 February 2023.

¹ Via email sent to RNZ on 16 January 2023.

133. Of particular importance in relation to the discussion with Mr White is that the potential impacts of topography were discussed. Mr White noted that topography would have no impact in relation to the identified effects sought to be managed.
134. Further correspondence with Mr White in relation to the height limit sought reiterated a key point being that there are many variables involved and that analysis is required on a case-by-case basis to ensure compliance with the relevant standards and guidelines.

3.3.2.2.3 *Qualifying matters sought*

135. In order to respond to the potential adverse effects identified above, RNZ seek that:

- Within 528 metres of the Porirua Site, there should be no structures above 10 metres in height; and
- Within 1,057 metres of the Porirua Site, the design of any structure above 10 metres in height must include a site-specific and construction materials specific EMR assessment.

136. RNZ states that:

The proposed changes apply to all sites within these radii. RNZ do not seek any other modifications to density standards, as development below 10m is not associated with increased risk, and RNZ does not seek any limits on changed density standards within this height limit.

137. It is therefore the height limit of 10 metres within the specified radii that is assessed further below.

3.3.2.2.4 *Properties affected*

138. As identified above, RNZ have determined that adverse effects may be experienced where buildings or structure greater than 10 metres in height within 1,057 metres of the transmission mast, and will most likely occur within 528 metres. I understand from the information provided by RNZ that the radii relate to the wavelength of the transmission from the mast, with the 528 metre radius relating to one wavelength and the 1,057 metre radius relating to two wavelengths.
139. The area encompassed by the 528-metre and 1,027-metre radii from the mast is shown in Figure 1 below.
140. The 1,057-metre radius from the radio tower shown in Figure 1 encompasses approximately 76.3 hectares of land proposed to be zoned MRZ under Variation 1, and 0.28 hectares of land proposed to be zoned NCZ. There are approximately 788 allotments within or partially within the 1,057-metre radius and proposed to be zoned MRZ or NCZ. Two of these are within the NCZ, and 786 are within the MRZ. A schedule of all of the affected allotments is attached at Appendix C.
141. The 528-metre radius from the radio tower shown in Figure 1 encompasses approximately 18 hectares of land proposed to be zoned MRZ. This includes approximately 202 allotments.
142. I note that the site at 47 Jillett Street contains Titahi Bay North School and covers approximately three hectares. The site is designated by the Ministry of Education, identified as MEDU-03 in the PDP. Under section 176 of the RMA the proposed height limits would not apply to a project or work undertaken by the Ministry of Education under the designation. However, the potential effects would be considered through outline plans required under section 176A for any project or work to be constructed on the site.

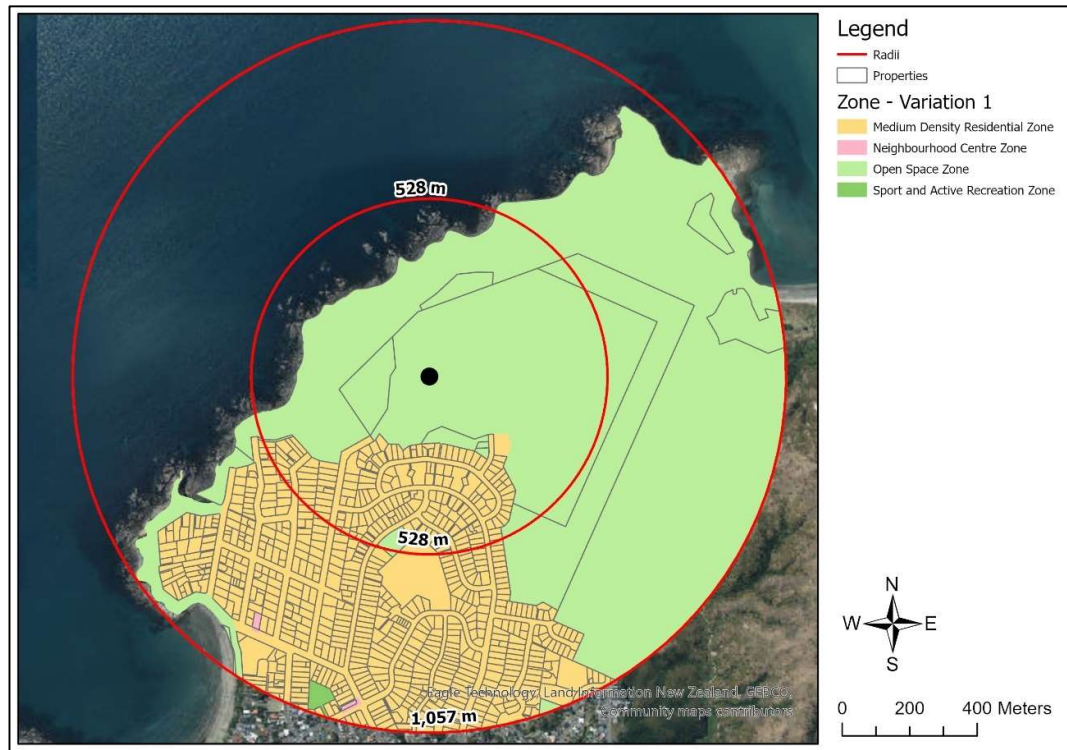


Figure 1: RNZ Qualifying Matter geographic area

3.3.2.2.5 PDP Variation 1 Height limits

143. Within the MRZ, the height of buildings and structures is generally proposed to be limited to 11 metres under MRZ-S1-1.a. Different heights apply to areas of the MRZ - Residential Intensification Precinct (RIP), and where Height Controls apply. Specified exceptions are allowed for in relation to pitched roofs, a range of other structures typically located above buildings, and emergency service structures.
144. Buildings and structures within the RIP are permitted up to 18 metres in height. Part of the MRZ – RIP is located in the southwest of the 1,057-metre radius, as shown in Figure 2 below. The RIP covers approximately 11.37 hectares of land within the 1,057-metre radius area. There are approximately 119 allotments within this area.
145. The Height Control areas limit height of buildings and structures to various heights. Within the MRZ, only Height Control – Shading B and C are located within the 1,057-metre radius from the RNZ transmission mast. These areas are shown in Figure 3 below. Height Control – Shading B areas are located within the RIP and limit the height to 14 metres. Height Control – Shading C are located outside of the RIP and limit height to nine metres. Height Control – Shading B covers approximately 1.2 hectares, while Height Control – Shading C covers approximately 8.2 hectares.

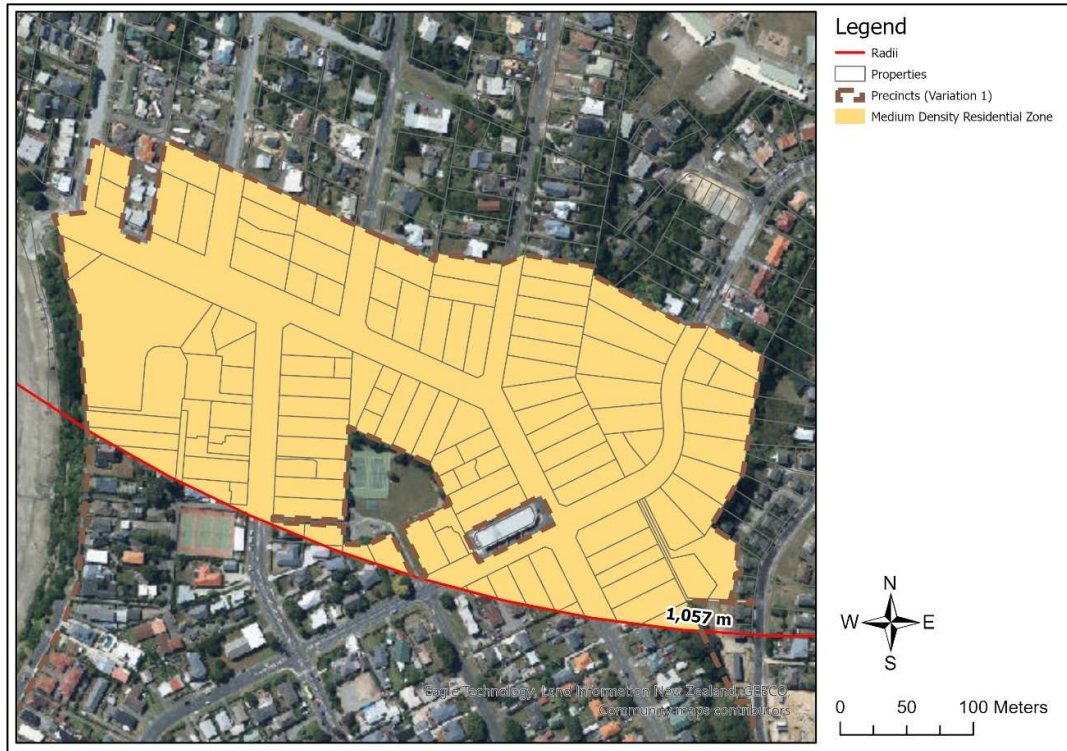


Figure 2: Residential Intensification Precinct within the 1,057 radius

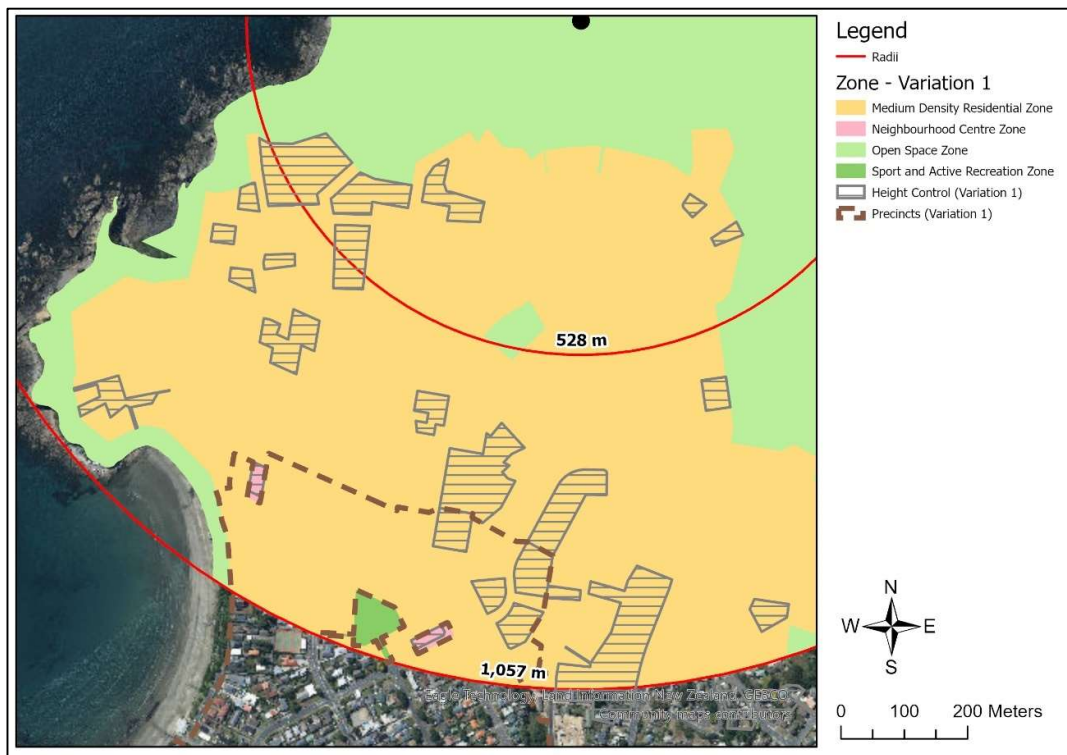


Figure 3: Height Control areas

146. Within the NCZ, height is generally limited to 12 metres under NCZ-S1-1.a. Height is limited to 18 metres for sites subject to the Height Increase B under NCZ-S1-1.c, which applies to all sites within both areas of the NCZ within the 1,057-metre radius from the RNZ transmission mast.
147. Within the OSZ – Open Space Zone and SARZ - Sport and Active Recreation Zone, the height of buildings and structures is generally limited to five and eight metres respectively. However, light poles are permitted up to 18 metres in height in both zones.
148. The relevant permitted heights of buildings and structures in each relevant zone is summarised in Table 3 below.

Table 3: Summary of Variation 1 height limits in relevant zones

	MRZ	LCZ	OSZ	SARZ
General	11m	12m	5m	8m
Residential Intensification Precinct	18m	-	-	-
Height Control – Shading B	14m	-	-	-
Height Control – Shading C	9m	-	-	-
Height Increase B	-	18m	-	-
Pitched Roofs	+1m to height limit	-	-	-
Zone specific exemptions	Range of structures typically located above buildings and emergency service structures		Light poles – 18m	

149. As identified in Table 3, the relevant height limits in the MRZ and LCZ within the 1,057 radius from the RNZ transmission mast are all above the 10 metre limit sought by RNZ, except within the areas identified as Height Control – Shading C. However, even within these areas, the exemptions for emergency service facilities would apply.
150. Within the OSZ and SARZ, the height limits are below the 10-metre limit sought by RNZ, except for light poles. Therefore, I consider that any qualifying matter related to the RNZ transmission mast is unnecessary for any land within the OSZ and SARZ.
151. I note that within the ODP, the urban area is predominantly zoned Suburban, with pockets of Recreation and Open Space zones. The Suburban zone has a height limit of eight metres, while the Recreation and Open Space zones height limits reflect those in the PDP.

3.3.2.2.6 Section 77 assessment

152. Information was provided by RNZ on the Draft Variation which raised the issue of potential risks from EMR coupling between RNZ transmission mast and buildings and structures near the mast exceeding 10 metres in height. RNZ sought a qualifying matter be applied. That information was considered prior to notification. This consideration was summarised in Appendix G of the 'Section 32 Evaluation – Part B – Urban intensification MDRS and NPS-UD Policy 3'. That report noted in the Council response to the information provided that:

Insufficient information has been provided to demonstrate that the requirements are qualifying matters.

[...]

It also has not been demonstrated that the risk of electromagnetic radiation is not already managed by other regulations such as HSNO or under the Health and Safety at Work Act 2015.

153. In relation to this response, RNZ provided with its submission on Variation 1 an assessment against section 77L and a description of other regulation in relation to management of the hazards from EMR. I generally agree with the assessment provided by the submitter. Further to that assessment, I note that:

- In relation to 77L(b), Objective 1 of the NPS-UD includes people and communities being enabled to provide for their health and safety;
- In relation to section 77L(c)(i), I note that the geographic area of the application of the proposed qualifying matter is identified in Figure 1 above. Additionally, I have compiled a list of the affected allotments within the MRZ and NCZ and have attached this at Appendix C.
- In relation to section 77L(c)(ii), the relevant site characteristics relate only to the geographic proximity to the RNZ transmission mast. I note again the information provided by RNZ's technical specialist Mr White that topography is not a relevant consideration.²
- RNZ's submission states that, '[t]he proposed 10 metre height limit is the only option available to protect people from unsafe EMR levels.' In terms of other potential options, because of the height standards in the MDRS and the limit being sought by RNZ being only one metre different, I do not consider that there are any other viable middle-ground alternatives. As such, I consider that the only viable high-level options are therefore to limit height to 10 metres within the specified area, or not.

154. I have undertaken a section 32AA assessment, attached at Appendix D. Overall, I consider that the option to limit the height of buildings and structures with 1,057 metres of the transmission mast, as sought by RNZ, to be the more appropriate option. I note that in coming to this conclusion, I am relying on the information provided by RNZ in relation to the potential health and safety effects of buildings and structures greater than 10 metres.

155. Additionally, my section 32AA evaluation attached at Appendix D also assesses the different options to give effect to that option. Those options are discussed further in section 3.3.3 below relating to the specific amendments sought by RNZ.

3.3.2.2.7 Regional Policy Statement

156. While the MDRS and Policy 3 of the NPS-UD direct district plans to provide for intensification, I note that this needs to be considered alongside the objectives and policies of the RPS to which the PDP must give effect. Policy 8 of the RPS states:

Policy 8: Protecting regionally significant infrastructure – regional and district plans

District and regional plans shall include policies and rules that protect regionally significant infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to the infrastructure.

² Pers comm, 19 January 2023

157. The 'Radio New Zealand and NZME Radio Limited's radio transmission facilities at Titahi Bay' is specifically identified as regionally significant infrastructure in the PDP definitions. Therefore the PDP must include policies and rules to protect that infrastructure from incompatible new subdivision, use and development occurring under, over, or adjacent to it.

3.3.2.2.8 Development Capacity

158. The amendments to give effect to the RNZ transmission facilities as a qualifying matter relate only to the height of buildings and structures. Section 3.3.2.2.5 above identifies the relevant height limits in the PDP (as amended through Variation 1).

159. The height limit sought by RNZ of 10 metres would likely enable two storey residential development, and potentially three storeys in some cases depending on location and design. I note that Property Economics (20022) translated maximum height limits into a maximum number of storeys using a 3.5 metre average stud height in 'Variation 1 and Change 19 Qualifying Matters Assessment', which would also imply development being limited to two storeys. In the LCZ, commercial development would also likely be limited to two storeys.

160. The majority of the affected area is zoned MRZ with no other relevant height controls or increases, and so has a height limit of 11 metres. The height limit sought by RNZ of 10 metres would therefore reduce this by one metre and remove the extra allowance for one metre for pitched roofs.

161. Within the areas subject to Height Control – Shading C, the height limit is nine metres, and therefore the height limit sought by RNZ would have no impact on the overall development capacity.

162. Within the RIP, the 10 metre height limit would be a reduction from the general height limit of 18 metres, as well as a reduction from the height limit within the Height Control – Shading B areas of 14 metres.

163. As both areas identified as LCZ within the 1,057-metre radius is covered by the Height Increase B area, the 10 metre limit sought by RNZ would be a reduction from 18 metres across both LCZ areas.

164. These matters are summarised in Table 4 below, in relation to the number of affected allotments and the total area of those allotments.

Table 4: Impacts on development capacity

Area	Height reduction	Likely development capacity impact	Area affected (ha) ³	Number of allotments affected
MRZ (excluding RIP and Height Control areas)	1m (+1m roof pitch)	Likely to reduce development potential by one floor	44.95	573
MRZ - Height Control – Shading C	No reduction	No impact	8.25	95

³ The affected area is the total sum of the area of parcels within the 1,057 radius. This does not include roads or parts of parcels outside of the specified radius.

Area	Height reduction	Likely development capacity impact	Area affected (ha) ³	Number of allotments affected
MRZ - RIP	8m (+1m roof pitch)	Reduced by three floors	7.735	104
MRZ - RIP - Height Control – Shading B	4m (+1m roof pitch)	Reduced by two floors	1.203	15
LCZ - Height Increase B	8m	Reduced by two-to-three floors	0.1590	2

165. Given the likely limitation of a 10 metre height limit resulting in residential development being limited to two-storeys, it is assumed that the qualifying matter sought by RNZ would effectively cancel out the Variation 1 amendments and reduce the development capacity of the affected area to PDP 2020 levels. This would likely be a significant reduction in development capacity within the affected area.
166. The estimated loss of development capacity within the area affected by the height limit sought by RNZ is set out in Table 5. These figures are not the result of modelling, but rather assumptions based on the figures provided in the development capacity reports 'Porirua Feasible Capacity Assessment' (Property Economics, 2021) and 'Variation 1 and Change 19 Qualifying Matters Assessment' (Property Economics, 2022). The assumptions and methodology for calculating the estimated loss are set out in Appendix E.

Table 5: Estimated Loss of Development Capacity within Affected Area

	Variation 1	With 10m Height limit (assumed PDP capacity)	Loss
Theoretical Capacity	4,395	3,351	828
Realisable Capacity	755	393	362

167. I note that the 2022 report from Property Economics identifies a total realisable capacity within Porirua under Variation 1 of 20,351, which is a difference of 15,155 above the figure for the 'demand plus NPS-UD buffer'. The loss of development capacity from the height limit sought by RNZ would therefore represent approximately 1.8 percent of the total realisable capacity and approximately 2.4 percent of the difference to the demand plus NPS-UD buffer.

3.3.2.2.9 Further submitters

168. I note that Kāinga Ora [FS76] opposes a qualifying matter for radiocommunication transmission being incorporated into the PDP as sought by RNZ. Kāinga Ora states that:

Kāinga Ora opposes the introduction of the proposed qualifying matter and resulting changes sought to the MDRS and proposed new matter of discretion. Kāinga Ora does not consider the submitter has provided adequate reasoning to demonstrate why a 1m reduction from 11m to 10m within 528m of the Porirua Site is necessary to manage the stated effect(s).

169. RNZ may wish to address Kāinga Ora's further submitters at the hearing. I note that Kāinga Ora has not provided any technical information contradicting RNZ's assessment of the need to limit height within the specified area. As such, because of the technical expertise of RNZ in the matter

of radiocommunication facilities and the analysis above, I do not agree with the further submitter.

3.3.2.2.10 Summary

170. Overall, I agree in principle with the introduction of a qualifying matter addressing the height of buildings and structures within a defined radius of the radio transmission mast, as sought by RNZ.

171. The specific amendments to give effect to the qualifying matter are assessed in section 3.3.3 below.

3.3.2.3 Summary of recommendations

172. I recommend for the reasons given in the assessment, that the submissions from RNZ [OS73.1, OS73.16, OS73.5, OS73.6, OS73.7, OS73.8 and OS73.9] be **accepted in part**.

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

3.3.3 Specific Amendments

3.3.3.1 Matters raised by submitters

174. RNZ [OS73.11, OS73.12, OS73.13, OS73.14 and OS73.15] seeks specific amendments to the PDP to give effect to the qualifying matter sought as set out above, being:

- New qualifying matter for 'Radiocommunication Transmission';
- Additional text in the RESZ chapter to recognise that additional controls are necessary to mitigate the adverse effects resulting from taller buildings in close proximity to RNZ's transmission infrastructure;
- A new policy in the RESZ chapter for 'Height Control – Radiocommunication Transmission';
- A new clause in MRZ-S2 limiting height to 10 metres on sites subject to Height Control – Radiocommunication Transmission; and
- Amending the planning maps to identify sites subject to the radiocommunication transmission qualifying matter using the 1,027-metre radius.

175. The reasons stated are those set out in the submitter's wider submission, as discussed in the sections above.

3.3.3.2 Assessment

176. Based on the assessment of the submission points above seeking a qualifying matter for radiocommunication transmission, I consider that at a high level, a planning response is required in order to address the potential adverse effects, as assessed above.

177. I also consider that a height limit of 10 metres is appropriate within 1,057 metres of the transmission mast owned and operated by RNZ.

178. While I agree with the overall intention of the submission, I do not fully agree with provisions sought by RNZ to give effect to the qualifying matter. The provisions sought would effectively

make any building or structure within the MRZ exceeding 10-metres in height within 1,057-metres of the transmission mast a restricted discretionary activity.

179. I consider that the provisions should be proportional to the identified risk, and reflect the existing provisions in the PDP relating to Gas Transmission and Electricity Transmission lines in the zone chapters. That is, separate rules within the relevant zones, with the 10 metre height limit incorporated into the rule. I consider that this will be more appropriate as it will avoid unintended consequences due to the range of heights and associated exemptions listed in the height standards, as well as being consistent with other similar provisions.

180. I consider that a controlled activity for buildings and structures that exceed 10 metres in height between the 528 metre and 1,057 metre radii is appropriate. This area is recommended to be referred to as the Radio Transmission Height Control Area B. I note that RNZ's submission states:

Provided that proper construction safety measures are taken, the majority of sites subject to new height limits will still be fully available for increased intensification.

181. This is consistent with the information provided by Mr White during the discussions noted above, who noted that between the 528 metre and 1,057 metre radii the effects are relatively easy to manage with appropriate mitigation. The controlled activity status within this area will enable appropriate consideration of the proposed development to occur consistent with the outcome sought by RNZ, while having minimal administrative costs for consent applicants.

182. Within the 528-metre radius, which is recommended to be referred to as the Radio Transmission Height Control Area A, I consider a restricted discretionary activity is appropriate, as this will enable inappropriate buildings or structures to be refused consent, while still being a relatively enabling and targeted activity status, with the consideration of any buildings and structure exceeding 10 metre being limited to the matters of discretion.

183. I consider that consideration of both controlled and restricted discretionary activities should refer to a specific policy that sets out the relevant matters located within the INF – Infrastructure chapter. This is consistent with similar provisions relating to the Gas Transmission Pipeline Corridor. I do not consider that any amendments to the RESZ policies are required, given that qualifying matters generally are addressed by RESZ-P2, and matters of health and well-being of people and communities are also addressed in the policies.

184. RNZ's submission only included specific requested relief in relation to the How the Plan Works, RESZ and MRZ chapters, and within the MRZ chapter only sought amendments to the height standard in MRZ-S2. However, as noted above, in order to be consistent with other similar provisions, aid plan interpretation and to comprehensively address the issues raised by RNZ while also tailoring provisions proportional to the identified risk, I consider that there is a need for new rules to be incorporated into both the MRZ and NCZ chapters. Additionally, it is the provisions in the TEMP – Temporary Activities chapter that address temporary buildings and structures ancillary to a construction activity. I consider that amendments to TEMP-R1 are therefore also required in order to address the potential risks associated with temporary construction related buildings and structures.

185. I note that in relation to the LCZ, the height limit would be a qualifying matter under section 770(j) of the RMA. I consider the assessment provided by RNZ and discussed above addresses the matters under section 77R.

186. To identify the geographic area to which the policy and rules relate, I agree with RNZ [OS73.15] that the planning maps should be amended. I recommend an additional layer be added under the 'Energy Infrastructure and Transport Overlays' with the title 'Radio Transmission Height Control Area'.
187. While the more general submission points RNZ [OS73.1, OS73.16, OS73.5, OS73.6, OS73.7 and OS73.8] assessed above may provide sufficient scope for these recommended amendments, to avoid any doubt in relation to scope regarding the rules in the MRZ, and the INF, LCZ and TEMP chapters generally, the Hearing Panel might wish to exercise the discretion granted to them under clause 99(2)(b) of Schedule 1 of the RMA. This allows the Panel to make recommendations on Variation 1 on matters that are outside the scope of submissions.
188. I note that, as identified in section 3.3.2 above, while there are areas of OSZ and SARZ within the 1,057-metre radius, these have lower height limits and therefore controls are not necessary. Additionally, any development within these zones would be undertaken by a statutory agency, and therefore the risk of a lack of consultation with RNZ is low.
189. I also note that I have considered alternative options in the section 32AA evaluation of the recommended provisions in Appendix D. Overall, I consider that the recommended amendments are the most efficient and effective, and therefore the most appropriate to give effect to the relevant objectives.

3.3.3.3 Summary of recommendations

190. I recommend for the reasons given in the assessment, that the Hearings Panel:
- a. **Add** new rules to the MRZ and LCZ chapters for buildings and structures within the Radio Transmission Height Control Area as set out in Appendix A;
 - b. **Amend** TEMP-R1 to include new clauses for buildings and structures within the Radio Transmission Height Control Area as set out in Appendix A;
 - c. **Add** a new policy to the INF chapter for buildings and structures within the Radio Transmission Height Control Area as set out in Appendix A; and
 - d. **Add** Radio Transmission Height Control Area A and Radio Transmission Height Control Area B to the planning maps as set out in Appendix A.
191. I recommend that the submissions from RNZ [OS73.15] be **accepted**.
192. I recommend that the submissions from RNZ [OS73.11, OS73.12, OS73.13, OS73.14 and OS73.15] be **accepted in part**.
193. My recommendations in relation to further submissions reflect the recommendations on the relevant primary submission.

3.4 Minor Errors

194. I recommend that an amendment be made to the exemption for warning devices and sirens used by emergency services in the NOISE – Noise chapter to clarify the exemption also applies to sirens used for training purposes. This amendment could have been made after PDP was notified through the RMA process to correct minor errors⁴, but I recommend the amendment is made as part of the Hearing Panel's recommendations for completeness and clarity. The amendment is set out below:

4. Any warning device or siren used by emergency services for emergency or training purposes (and routine testing and maintenance).

⁴ Clause 16 of RMA Schedule 1

4 Conclusions


195. Submissions have been received in support of and in opposition to the PDP and Variation 1. While most of these submissions relate to specific topics or chapters as notified, the FENZ and RNZ submissions seek amendments to recognise and provide for their facilities or specific interests.
196. 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.
197. For the reasons set out in the Section 32AA evaluation included throughout this report and attached at Appendix D, 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~~.

NOISE - Noise

Noise generation can be an intrinsic part of how a diverse range of activities and industries operate and function in the City.

[...]

The following are all exempt from the rules and standards in this chapter:

1. Aircraft being operated during flight;
2. Vehicles being driven on a road (within the meaning of section 2(1) of the Transport Act 1998), or within a site as part of or compatible with a normal residential activity;
3. Trains on rail lines (public or private) and crossing bells within the road reserve, including at railway yards, railway sidings or stations. This exemption does not apply to the testing (when stationary), maintenance, loading or unloading of trains;
4. Any warning device or siren used by emergency services for emergency or training purposes (and routine testing and maintenance);
5. The use of generators and mobile equipment (including vehicles) for emergency purposes, including testing and maintenance not exceeding 48 hours in duration, where they are operated by emergency services or lifeline utilities, or for the continuation of radiocommunication broadcasts from Radio New Zealand's Titahi Bay facilities;
6. Activities at emergency service facilities associated with emergency response and emergency response training;
7. Farming activity, agricultural vehicles, machinery or equipment used on a seasonal or intermittent basis for primary production in the Rural Zones;
8. Helicopters used in emergencies or as air ambulances;
9. Impulsive sounds (hammerings and bangs) and dog barking noise;
10. Crowd noise from activities in Open Space and Sport and Active Recreation Zones; and
11. Temporary Activities in the City Centre, General Rural, Rural Lifestyle, Mixed Use and Local Centre Zones on New Year's Eve until 1.00am on New Year's Day only, where in accordance with the rules and standards in the Temporary Activities chapter.

INF – Infrastructure

INF-P26 Buildings and structures within the Radio Transmission Height Control Area

Consider the following matters when assessing any buildings and structures proposed within the Radio Transmission Height Control Area:

1. The extent to which the proposed development will avoid the potential reverse sensitivity effects on and amenity and nuisance effects of the Radio Transmission site;
2. The risk of electromagnetic hazards affecting public or individual safety, and the risk of property damage;
3. Measures proposed to mitigate other adverse effects on the operation, maintenance, upgrading and development of the Radio Transmission site;
4. Technical advice from an electrical engineer specialising in radio transmission;
5. The outcome of any consultation with Radio New Zealand; and
6. Whether the building or structure could be located further from the Radio Transmission site.

MRZ - Medium Density Residential Zone

MRZ-Rx Buildings and structures within the Radio Transmission Height Control Area

1. Activity status: **Permitted**

Where:

- a. The building or structure is no greater than 10m in height.

2. Activity status: **Controlled**

Where:

- a. Compliance is not achieved with MRZ-Rx-1.a; and
- b. The building or structure is within the Radio Transmission Height Control Area B.

Matters of control are reserved to:

1. The matters in INF-P26

Section 88 information requirements for applications:

1. Applications under this rule must provide, in addition to the standard information requirements, an assessment prepared by a suitably qualified and experienced professional of the effects of electromagnetic radiation generated by RNZ's transmission site on the safety of workers and occupants of the proposed buildings and structures.

3. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with MRZ-Rx-1.a; and
- b. The building or structure is within the Radio Transmission Height Control Area A.

Matters of discretion are restricted to:

1. The matters in INF-P26.

Notification:

- An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.
- When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, Porirua City Council will give specific consideration to any adverse effects on Radio New Zealand.

NCZ – Neighbourhood Centre Zone

NCZ-Rx Buildings and structures within the Radio Transmission Height Control Area

1. Activity status: **Permitted**

Where:

- a. The building or structure is no greater than 10m in height.

2. Activity status: **Controlled**

Where:

- a. Compliance is not achieved with NCZ-Rx-1.a; and
- b. The building or structure is within the Radio Transmission Height Control Area B.

Matters of control are reserved to:

1. The matters in INF-P26

Section 88 information requirements for applications:

1. Applications under this rule must provide, in addition to the standard information requirements, an assessment prepared by a suitably qualified and experienced professional of the effects of electromagnetic radiation generated by RNZ's transmission site on the safety of workers or occupants of the proposed buildings and structures.

3. Activity status: **Restricted discretionary**

Where:

- a. Compliance is not achieved with NCZ-Rx-1.a; and
- b. The building or structure is within the Radio Transmission Height Control Area A.

Matters of discretion are restricted to:

1. The matters in INF-P26.

Notification:

- An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.
- When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, Porirua City Council will give specific consideration to any adverse effects on Radio New Zealand.

[...]

NCZ-S1 Height

1. All buildings and structures must not exceed a maximum height above ground level of:

- d. 12m;
- e. 22m on sites subject to the Height Increase A identified on the planning maps; or
- f. 18m on sites subject to the Height Increase B identified on the planning maps.

Except that:

- Any fence or standalone wall along a side or rear boundary which adjoins a site zoned High Density Residential Zone, Medium Density Residential Zone, Open Space Zone or Sport and Active Recreation Zone must not exceed 2m in height.

This standard does not apply to:

- Solar water heating components provided these do not exceed the height by more than 1m;
- Chimney structures not exceeding 1.1m in width on any elevation and provided these do not exceed the height by more than 1m;
- Antennas, aerials, and flues provided these do not exceed the height by more than 1m;
- Satellite dishes (less than 1m in diameter) and architectural features (e.g. finials, spires) provided these do

Matters of discretion are restricted to:

1. The location, design and appearance of the building or structure;
2. Loss of sunlight to adjacent public space;
3. Visual dominance, shading and loss of privacy for adjoining Residential or Open Space and Recreation zoned sites;
4. Wind effects on the safety and amenity of the adjacent public space;
5. The planned urban built form;
6. Shading to surrounding buildings; and
7. Whether an increase in building height results from a response to natural hazard mitigation.

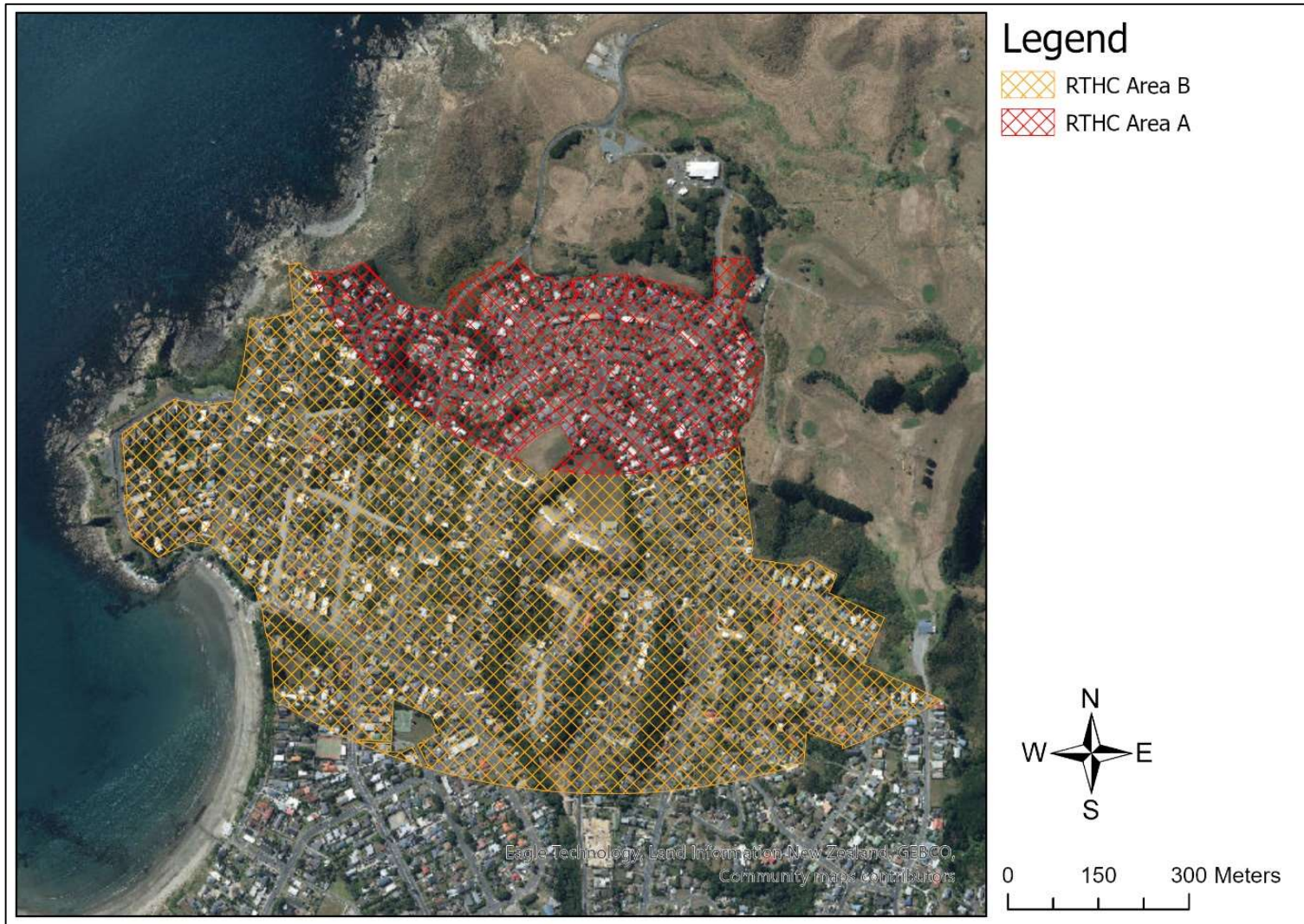
- not exceed the height by more than 1m; or
- Lift overruns provided these do not exceed the height by more than 1m.
 - Hose drying towers associated with emergency service facilities provided these do not exceed a maximum height above ground level of 15m, except where the site is subject to a height control limit under NCZ-S1-1.b or NCZ-S1-1.c.

TEMP – Temporary Activities

TEMP-R1	Temporary building and structures ancillary to a construction activity.
All zones	<p>1. Activity status: Permitted</p> <p>Where:</p> <ul style="list-style-type: none"> a. The temporary building or structure is removed from the site within; <ul style="list-style-type: none"> i. One month of the completion of the project; or ii. 24 months from when first placed on site; whichever is the lesser; b. The temporary building or structure does not exceed the height of buildings and structures standard for the zone in which it will be located.; c. <u>The temporary building or structure does not exceed 10m in height within the Radio Transmission Height Control Area; and</u> ed. The temporary building or structure does not exceed the height in relation to boundary standard for the zone in which it will be located. <p>In case of doubt, TEMP-R1-1.b and TEMP-R1-1.ed do not apply to cranes.</p> <p>This rule does not apply to temporary military training activities.</p>
Medium Density Residential Zone	<p>2. Activity status: Controlled</p> <p>Where:</p> <ul style="list-style-type: none"> a. <u>Compliance is not achieved with TEMP-R1-1.c; and</u> b. <u>The building or structure is within the Radio Transmission Height Control Area B.</u>
Local Centre Zone	<p><u>Matters of discretion are restricted to:</u></p>

	<p>1. <u>The matters in INF-P26.</u></p> <p><u>Section 88 information requirements for applications:</u></p> <p>1. <u>Applications under this rule must provide, in addition to the standard information requirements, an assessment prepared by a suitably qualified and experienced professional of the effects of electromagnetic radiation generated by RNZ's transmission site on the safety of workers or occupants of the proposed buildings and structures.</u></p>
<p><u>Medium Density Residential Zone</u></p> <p><u>Local Centre Zone</u></p>	<p>3. Activity status: <u>Restricted discretionary</u></p> <p>Where:</p> <p>a. <u>Compliance is not achieved with TEMP-R1-1.c; and</u></p> <p>b. <u>The building or structure is within the Radio Transmission Height Control Area A.</u></p> <p>Matters of discretion are restricted to:</p> <p>1. <u>The matters in INF-P26.</u></p> <p>Notification:</p> <ul style="list-style-type: none"> • <u>An application under this rule is precluded from being publicly notified in accordance with section 95A of the RMA.</u> • <u>When deciding whether any person is affected in relation to this rule for the purposes of section 95E of the RMA, Porirua City Council will give specific consideration to any adverse effects on Radio New Zealand.</u>
All zones	<p>24. Activity status: Restricted discretionary</p> <p>Where:</p> <p>a. Compliance is not achieved with TEMP-R1-1.a, TEMP-R1-1.b or TEMP-R1-1.ed.</p> <p>Matters of discretion are restricted to:</p> <p>2. Positive effects enabled through the activity; and</p> <p>3. The matters in TEMP-P2.</p>

Planning Maps



Appendix B. Recommended Responses to Submissions and Further Submissions

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

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

Note: Further submitter Leigh Subritzky (FS17) supported original submissions 58 and 73. Due to size, these further submission points are not included in the table below.

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
Fire and Emergency New Zealand						
General						
OS58.1	General	<p>[Not specified, refer to original submission]</p> <p>While no specific decision sought, the submitter raised the following matter(s): <i>Due to operational and training requirements, FENZ has an interest in the land use provisions of the Proposed District Plan to ensure that, where necessary, appropriate consideration is given to fire safety and operational firefighting requirements, particularly in relation to housing development (e.g. to ensure adequate consideration is given to risk reduction and emergency response requirements) and fire station development (e.g. to ensure the development of new fire station facilities are appropriately enabled, in the context of the sustainable management of natural and physical resources).</i></p> <p>To meet its statutory responsibilities, FENZ requires:</p> <ul style="list-style-type: none"> • the ability to construct and operate fire stations in locations which will enable reasonable response times to fire and other emergencies; • the ability to undertake training activities for the firefighters within the region; and • adequate access and water supply for new developments and subdivisions to ensure that FENZ can effectively and efficiently respond to emergencies. <p>There are three fire stations within the Porirua District. [Refer to original submission for full reason, including attachment]</p> <p>The effects of a fire station can be largely anticipated and, in the most part, do not differ to the effects of a number of activities that may be anticipated in urban or peri-environments.</p> <p>In terms of height requirements, fire stations will generally be single storied buildings of approximately 8 to 9 metres in height. Hose drying towers may also be required in some cases, which can be around 12 to 15 metres in height.</p> <p>Setback distances from road frontages are also required to accommodate the stopping of appliances outside the appliance bays, but off the road reserve area.</p> <p>Vehicle movements to and from fire station sites differ depending on whether a fire station accommodates volunteer or career firefighters, on the number of emergencies, and are primarily related to fire appliances movements and firefighter private vehicles. Noise will also be produced on site by operational activities such as cleaning and maintaining equipment, training activities and noise produced by emergency sirens. Training may take place anywhere between 7:00am and 10:00pm. Cleaning and maintenance will generally take place during the day; however, it can take place after a call out which can occur at any time. Generally, FENZ has assessed that a fire station will be capable of meeting the standards set out in NZS 6802:2008 Acoustics - Environmental noise (Table 3 - Guideline residential upper noise limits), with the exclusion of noise created by emergency sirens.</p>	3.2.1	Accept in part	See body of report	No
OS58.2	General	<p>[Not specified, refer to original submission]</p> <p>While no specific decision sought, the submitter raised the following matter(s):</p>	3.2.1	Accept in part	See body of report	No

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<p><i>The provision of adequate firefighting water supply access to that supply is critical. It is important to FENZ that any new dwelling or land use that does not have access to a reticulated water supply has access to an adequate firefighting water supply of some kind. This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore achieves the purpose of the Resource Management Act 1991 (RMA).</i></p> <p><i>The New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard which sets out the requirements for firefighting water and access. The Code of Practice enables a consistent approach throughout New Zealand and allows FENZ to respond effectively and efficiently to a fire emergency. The Code of Practice provides techniques to define a sufficient firefighting water supply that may vary according to the circumstances and is based on an assessment of the minimum water supply needed to fight a fire and to limit fire spread. Volumes required vary according to each different building's fire hazards. The operative District Plan does not make reference to the Code of Practice 4509:2008, however, it contains multiple provisions relating to the operational requirements of firefighters. FENZ acknowledges these provisions in the operative district plan and seeks to provide guidance to NPDC as to how best to improve the provisions of the district plan with respect to providing firefighting water supply and access to better enable FENZ to meet its statutory responsibilities.</i></p> <p><i>Adequate access to both the source of a fire and a firefighting water supply is also essential to the efficient operation of FENZ. The requirements for firefighting access are set out in the Code of Practice and further detailed in FENZ's 'Emergency Vehicle Access Guidelines' (May 2015). A fire appliance requires, as a minimum, access which is four metres in width and four metres in height clearance, with a maximum gradient of 1 in 5 (and accompanying transition ramps).</i></p>				
OS58.3	General	Seeks that new fire stations are provided for in all zones permitted, controlled or restricted discretionary activities with permitted standards appropriately recognising emergency services, such as through building height and access provisions which accommodate the requirements of fire stations.	3.2.1	Accept in part	See body of report	No
Subdivision						
OS58.21	SUB-R17	<p>Amend as follows:</p> <p><i>Matters of discretion are restricted to:</i></p> <p>...</p> <p>2. <u><i>The ability for fire appliances to access the site</i></u></p> <p>3. <u><i>The provision of a firefighting water supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509: 2008.</i></u></p>	3.2.6	Reject	See body of report	No
Noise						
OS58.22	NOISE - Noise > New Provision	<p>Add new objective:</p> <p><u><i>NOISE-OX Where the locational, functional or operational needs are such that activities of importance to the community could not otherwise meet noise and vibration standards, enable these activities by allowing a whole or partial exemption, or relaxation, from those noise standards.</i></u></p>	3.2.6	Accept in part	See body of report	No
OS58.23	NOISE - Noise > New Provision	Add policy:	3.2.6	Accept in part	See body of report	No

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<i><u>NOISE-PX To allow a marginal relaxation of noise standards, but not exceeding National Standards, where the noise generating activity is of importance to the safety of the community, such as the operation of emergency services.</u></i>				
OS58.24	NOISE - Noise > New Provision	Add policy: <i><u>NOISE-PX To allow noisy activities of limited duration and frequency which are of importance to the community, such as noise associated with the operation of emergency services and temporary military training activities, subject to appropriate controls.</u></i>	3.2.6	Accept in part	See body of report	No
OS58.25	NOISE - Noise > New Provision	Add new rule: <u>NOISE -RX Noise from Emergency Services Facilities and Temporary Emergency Services Training Activities (All zones)</u> 1. <u>Activity status: Permitted</u> <u>Where:</u> <i><u>The noise source is a warning device or siren (including their routine testing and maintenance) associated with an Emergency Service Activity or Temporary Emergency Services Training Activity when measured within the site boundary of a receiving site, or within the notional boundary of rural dwellings or habitable buildings.</u></i>	3.2.6	Accept in part	See body of report	Yes
OS58.26	Definitions > New Definition	Add new definition: <u>Temporary Emergency Services Training Activity</u> <i><u>means a temporary activity undertaken for the training of any component of FENZ New Zealand for any emergency purpose. An emergency purpose are those purposes which enable FENZ New Zealand to achieve its main functions under sections 11 and 12 of the FENZ New Zealand Act 2017.</u></i>	3.2.6	Accept in part	See body of report	No
Zone Chapter Policies						
OS58.47	NCZ-P4	Amend as follows: <i><u>Provide for other activities within the Neighbourhood Centre Zone, including larger-scale commercial activities and retail activities, where:</u></i> ... <i><u>4. There is a functional and operational need to locate in the area.</u></i>	3.2.2	Reject	See body of report	No
OS58.55	LCZ-P4	Amend: <i><u>Provide for other activities within the Local Centre Zone, including larger-scale activities where:</u></i> ... <i><u>5. There is a functional and operational need to locate in the area.</u></i>	3.2.2	Reject	See body of report	No
OS58.64	LFRZ-P4	Amend: <i><u>Provide for other activities within the Large Format Retail Zone where:</u></i> ... <i><u>4. There is a functional and operational need to locate in the area.</u></i>	3.2.2	Reject	See body of report	No
OS58.72	MUZ-P4	Amend: <i><u>Provide for other activities within the Mixed Use Zone, including larger-scale activities where:</u></i>	3.2.2	Reject	See body of report	No

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		... <i>4. There is a functional and operational need to locate in the area.</i>				
OS58.80	MCZ-P4	Amend: Provide for other activities within the Metropolitan Centre Zone where: ... <i>5. There is a functional and operational need to locate in the area.</i>	3.2.2	Reject	See body of report	No
Zone Chapter Provisions for Infrastructure and Water Supply						
OS58.30 ⁵	HRZ - High Density Residential Zone > New Provision	New objective: <u>HRZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.38 ⁶	MRZ - Medium Density Residential Zone > New Provision	Add a new objective: <u>MRZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.48 ⁷	NCZ - Neighbourhood Centre Zone > New Provision	Add a new objective: <u>NCZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.56 ⁸	LCZ - Local Centre Zone > New Provision	Add a new objective: <u>LCZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.65 ⁹	LFRZ - Large Format Retail Zone > New Provision	Add a new objective: <u>LFRZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.73 ¹⁰	MUZ - Mixed Use Zone > New Provision	Add a new objective: <u>MUZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.81 ¹¹	MCZ - Metropolitan Centre Zone > New Provision	Add a new objective: <u>MCZ-OX Infrastructure</u> <i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>	3.2.3	Reject	See body of report	No
OS58.87 ¹²	GIZ - General Industrial Zone > New Provision	Add a new objective: <u>GIZ-OX Infrastructure</u>	3.2.3	Reject	See body of report	No

⁵ Supported by KiwiRail [FS72.16]

⁶ Supported by KiwiRail [FS72.17]

⁷ Supported by KiwiRail [FS72.18]

⁸ Supported by KiwiRail [FS72.19]

⁹ Supported by KiwiRail [FS72.20]

¹⁰ Supported by KiwiRail [FS72.21]

¹¹ Supported by KiwiRail [FS72.22]

¹² Supported by KiwiRail [FS72.23]. Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.179]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<i>Public health and safety is maintained through the appropriate provision of infrastructure.</i>				
OS58.31 ¹³	HRZ - High Density Residential Zone > New Provision	Add new policy: <i>HRZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.39 ¹⁴	MRZ - Medium Density Residential Zone > New Provision	Add new policy: <i>MRZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.49 ¹⁵	NCZ - Neighbourhood Centre Zone > New Provision	Add new policy: <i>NCZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.57 ¹⁶	LCZ - Local Centre Zone > New Provision	Add a new policy: <i>LCZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.66	LFRZ - Large Format Retail Zone > New Provision	Add a new policy: <i>LFRZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.74 ¹⁷	MUZ - Mixed Use Zone > New Provision	Add a new policy: <i>MUZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.82 ¹⁸	MCZ - Metropolitan Centre Zone > New Provision	Add a new policy: <i>MCZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.88 ¹⁹	GIZ - General Industrial Zone > New Provision	Add a new policy: <i>GIZ-PX Servicing</i> <i>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</i>	3.2.3	Reject	See body of report	No
OS58.32	HRZ-R1-1	Amend: Activity status: Permitted Where: ... <i>HRZ-SX is complied with.</i>	3.2.3	Reject	See body of report	No

¹³ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.154]

¹⁴ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.157]

¹⁵ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.161]

¹⁶ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.163]

¹⁷ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.165]

¹⁸ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.169]

¹⁹ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.180]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS58.36 ²⁰	HRZ - High Density Residential Zone > New Provision	Add a new standard: <u>HRZ-SX Servicing</u> 1. <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> 2. <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>	3.2.3	Reject	See body of report	No
OS58.40 ²¹	MRZ-R1-1	Amend: Activity status: Permitted Where: ... <u>MRZ-SX is complied with.</u>	3.2.3	Reject	See body of report	No
OS58.46 ²²	MRZ - Medium Density Residential Zone > New Provision	Add new standard: <u>MRZ-SX Servicing</u> 1. <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> 2. <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>	3.2.3	Reject	See body of report	No
OS58.50 ²³	NCZ-R1-1	Amend: Activity status: Permitted Where: ... <u>NCZ-SX is complied with.</u>	3.2.3	Reject	See body of report	No
OS58.54 ²⁴	NCZ - Neighbourhood	Add a new standard: <u>NCZ-SX Servicing</u>	3.2.3	Reject	See body of report	No

²⁰ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.155]

²¹ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.158]

²² Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.159]

²³ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.170]

²⁴ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.171]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
	Centre Zone > New Provision	<ol style="list-style-type: none"> <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u></p>				
OS58.58 ²⁵	LCZ-R1-1	Amend: Activity status: Permitted Where: ... <u>LCZ-SX is complied with.</u>	3.2.3	Reject	See body of report	No
OS58.62 ²⁶	LCZ - Local Centre Zone > New Provision	Add a new standard: <u>LCZ-SX Servicing</u> <ol style="list-style-type: none"> <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <p><u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u></p>	3.2.3	Reject	See body of report	No
OS58.67	LFRZ-R1-1	Amend: Activity status: Permitted Where: ... <u>LFRZ-SX is complied with.</u>	3.2.3	Reject	See body of report	No
OS58.71	LFRZ - Large Format Retail Zone > New Provision	Add a new standard: <u>LFRZ-SX Servicing</u> <ol style="list-style-type: none"> <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an</u> 	3.2.3	Reject	See body of report	No

²⁵ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.172]

²⁶ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.173]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<i>alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot. Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</i>				
OS58.75 ²⁷	MUZ-R1-1	Amend: Activity status: Permitted Where: ... <i>MUZ-SX is complied with.</i>	3.2.3	Reject	See body of report	No
OS58.79 ²⁸	MUZ - Mixed Use Zone > New Provision	Add a new standard: MUZ-SX Servicing 1. <i>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</i> 2. <i>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</i> <i>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</i>	3.2.3	Reject	See body of report	No
OS58.83 ²⁹	MCZ-R1-1	Amend: Activity status: Permitted Where: ... <i>MCZ-SX is complied with.</i>	3.2.3	Reject	See body of report	No
OS58.86 ³⁰	MCZ - Metropolitan Centre Zone > New Provision	Add a new standard: MCZ-SX Servicing 1. <i>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</i> 2. <i>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</i> <i>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New</i>	3.2.3	Reject	See body of report	No

²⁷ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.166]

²⁸ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.167]

²⁹ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.175]

³⁰ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.176]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<u>Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>				
OS58.89 ³¹	GIZ-R1-1	Amend as follows: <i>Activity status: Permitted</i> <i>Where:</i> ... <u>GIZ-SX is complied with.</u>	3.2.3	Reject	See body of report	No
OS58.93 ³²	GIZ - General Industrial Zone > New Provision	Add a new standard: <u>GIZ-SX Servicing</u> 1. <u>Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> 2. <u>Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>	3.2.3	Reject	See body of report	No
Height Standards						
OS58.34	HRZ-S2 Height	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Emergency service facilities up to 9m in height and hose drying towers up to 15m in height.</u>	Addressed in: <ul style="list-style-type: none"> Section 42A Officer's Report Part B – Residential Zones, Planning Maps and General Topics, as the submission relates to the relevant zones; and Section 42A Officer's Report Part A – Overarching, as the submission relates to Historic heritage or sites and areas of significance to Māori. 			
OS58.42	HRZ-S3	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Emergency service facilities up to 9m in height and hose drying towers up to 15m in height.</u>				
OS58.43	MRZ-S2	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Emergency service facilities up to 9m in height and hose drying towers up to 15m in height.</u>				
OS58.44	MRZ-S3	Amend: ... <i>This standard does not apply to:</i>				

³¹ Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.177]

³² Opposed by Retirement Villages Association of New Zealand Incorporated [FS118.178]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		... <u>x. Emergency service facilities up to 9m in height and hose drying towers up to 15m in height.</u>				
OS58.52	NCZ-S1	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Accept in part	See body of report	Yes
OS58.53	NCZ-S2	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject	See body of report	No
OS58.60	LCZ-S1	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject, as far as the submission relates to the zone.	See body of report See Section 42A Officer's Report Part A – Overarching, as far as the submission relates to Historic heritage or sites and areas of significance to Māori.	No
OS58.61	LCZ-S2	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject	See body of report	No
OS58.69	LFRZ-S1	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject	See body of report	No
OS58.70	LFRZ-S2	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject	See body of report	No
OS58.77	MUZ-S1	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject	See body of report	No
OS58.78	MUZ-S2	Amend: ... <i>This standard does not apply to:</i> ... <u>x. Hose drying towers up to 15m in height.</u>	3.2.4	Reject	See body of report	No
OS58.85	MCZ-S1	Amend: ... <i>This standard does not apply to:</i> ...	3.2.4	Reject	See body of report	No

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<i>x. Hose drying towers up to 15m in height.</i>				
OS58.91	GIZ-S1	Amend: ... <i>This standard does not apply to:</i> ... <i>x. Hose drying towers up to 15m in height.</i>	3.2.4	Reject	See body of report	No
Zone Chapter Standards for Fences and Standalone Walls						
OS58.35	HRZ-S10	Amend: <i>1. All fences and standalone walls must not exceed a maximum height above ground level of:</i> a. <i>exceed a maximum height above ground level of 1.2m for the length of the site boundary where that boundary is located between the front of a principal building and a road, except that the height above ground level can be up to 2m for up to 30% of the length of the boundary with a road;</i> b. <i>exceed a maximum height above ground level of 1.2m where a site boundary adjoins a public reserve, vested to Porirua City Council under the Reserves Management Act; and</i> c. <i>exceed a maximum height above ground level of 2m for all other site boundaries.</i> d. <i>Obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.</i>	3.2.5	Reject	See body of report	No
OS58.45	MRZ-S11	<i>1. All fences and standalone walls must not exceed a maximum height above ground level of:</i> a. <i>exceed a maximum height above ground level of 1.2m for the length of the site boundary where that boundary is located between the front of a principal building and a road, except that the height above ground level can be up to 2m for up to 30% of the length of the boundary with a road;</i> b. <i>exceed a maximum height above ground level of 1.2m where a site boundary adjoins a public reserve, vested to Porirua City Council under the Reserves Management Act; and</i> c. <i>exceed a maximum height above ground level of 2m for all other site boundaries.</i> d. <i>Obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.</i>	3.2.5	Reject	See body of report	No
OS58.92	GIZ-S6	Amend: <i>1. All fences and standalone walls must not exceed a maximum height above ground level of:</i> a. <i>exceed a maximum height above ground level of 1.2m for the length of the site boundary where that boundary is located between the front of a principal building and a Broken Hill road; and</i> b. <i>exceed a maximum height above ground level of 2m for site boundaries that adjoins a Residential Zone or Open Space and Recreation Zone.</i> c. <i>Obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.</i>	3.2.5	Reject	See body of report	No
Provisions sought to be retained						
OS58.4	HO-O2	Retain HO-O2.	These submission points are addressed in the Section 42A Officer's Report Part A - Overarching			
OS58.5	UFD-O3	Retain as drafted				
OS58.6	UFD-O7	Retain as drafted.				

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS58.7	HH-R6	Retain as drafted.				
OS58.8	HH-R7	Retain as drafted.				
OS58.9	HH-R8	Retain as drafted.				
OS58.10	HH-R9	Retain as drafted.				
OS58.11	SASM-R4	Retain as drafted.				
OS58.12	SUB-R1	Retain as notified.	n/a	Accept	No amendments are recommended to this provision	No
OS58.13	SUB-R2	Retain as drafted.	n/a	Accept	No amendments are recommended to this provision	No
OS58.14	SUB-R3	Retain as drafted.	n/a	Accept	No amendments are recommended to this provision	No
OS58.15	SUB-R4	Retain as notified.	n/a	Accept	No amendments are recommended to this provision	No
OS58.16	SUB-R10	Retain as notified.	3.2.6	Reject	See body of report	No
OS58.17	SUB-R11	Retain as notified.	3.2.6	Reject	See body of report	No
OS58.18	SUB-R12	Retain as notified.	3.2.6	Reject	See body of report	No
OS58.19	SUB-R14	Retain as notified.	3.2.6	Reject	See body of report	No
OS58.20	SUB-R13	Retain as notified	n/a	Accept	No amendments are recommended to this provision	No
OS58.27	RESZ-O2	Retain as drafted.	These submission points are addressed as relevant in: <ul style="list-style-type: none"> Section 42A Officer's Report Part B – Residential Zones, Planning Maps and General Topics; or Section 42A Officer's Report Part B – Commercial Zones 			
OS58.28	RESZ-O3	Retain as drafted.				
OS58.29	RESZ-P11	Retain as notified.				
OS58.33	HRZ-R16-1	Retain as drafted.				
OS58.37	MRZ-PREC02-O1	Retain as drafted.				
OS58.41	MRZ-R19	Retain as drafted.				
OS58.51	NCZ-R15	Retain as drafted.				
OS58.59	LCZ-R18	Retain as drafted				
OS58.63	LFRZ-O2	Retain as drafted				
OS58.68	LFRZ-R22	Retain as drafted				
OS58.76	MUZ-R24	Retain as notified.				
OS58.84	MCZ-R20	Retain as drafted.				
OS58.90	GIZ-R14	Retain as notified.				
OS58.94	DEV-NG-O3	Retain as notified.	n/a	Accept	No amendments are recommended to this provision	No
Plimmerton Farm						
OS58.95	General > Plimmerton Farm	[Not specified, refer to original submission]	These submission points are addressed in the Section 42A Officer's Report Part B – Plan Change 19			
OS58.96	General > Plimmerton Farm	[Not specified, refer to original submission]				
OS58.97	General > Plimmerton Farm	Requests that new stations are provided for in all zones permitted, controlled or restricted discretionary activities with permitted standards appropriately recognising emergency services, such as through building height and access provisions which accommodate the requirements of fire stations.				

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS58.98	General > Plimmerton Farm	Retain PFZ-O1 Integrated Development as drafted.				
OS58.99	General > Plimmerton Farm	Retain PFZ-O4 Well-functioning urban environment as drafted.				
OS58.100	General > Plimmerton Farm	Add a new objective as follows: <u>PFZ-O6 Infrastructure</u> <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u>				
OS58.101	General > Plimmerton Farm	Add new policy as follows: <u>PFZ-P8 Servicing</u> <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u>				
OS58.102	General > Plimmerton Farm	Relates to SUBPFZ-R2 and SUBPFZ-R3. Ensure existing/new subdivision standards require: <u>The provision of a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u> Include a new matter of discretion as follow: <u>The extent to which the site is appropriately serviced including wastewater, stormwater, and water supply, including a firefighting water supply and access to that supply in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>				
OS58.103	General > Plimmerton Farm	Retain PAPFZ-P1 as drafted.				
OS58.104	General > Plimmerton Farm	Retain PAPFZ-P3 as drafted.				
OS58.105	General > Plimmerton Farm	Add a new Precinct A objective as follows: <u>PAPFZ-O4 Infrastructure</u> <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u>				
OS58.106	General > Plimmerton Farm	Add new Precinct A policy as follows: <u>PAPFZ-P9 Servicing</u> <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u>				
OS58.107	General > Plimmerton Farm	Amend PAPFZ-R1, PAPFZ-R2, and PAPFZ-R5 to PAPFZ-R7 as follows: 1. Activity Status: Permitted Where: <u>Compliance is achieved with PAPFZ-SX.</u> Activity Status: Restricted Discretionary ... Matters of discretion are restricted to: ... <u>x. the extent to which the site is appropriately serviced, including a firefighting water</u>				

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<u>supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>				
OS58.108	General > Plimmerton Farm	Retain PAPFZ-R4 Signs as drafted.				
OS58.109	General > Plimmerton Farm	Amend PAPFZ-R8, PAPFZ-R9, PAPFZ-R11, PAPFZ-R12, PAPFZ-R13, as follows: Matters of discretion are restricted to: ... <u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u>				
OS58.110	General > Plimmerton Farm	Retain PAPFZ-R10 as drafted.				
OS58.111	General > Plimmerton Farm	Amendment to PAPFZ-S1 sought: <u>This standard does not apply to hose drying towers up to 15m in height.</u>				
OS58.112	General > Plimmerton Farm	Add a new Precinct A standard as follows: <u>PAPFZ-SX Servicing</u> <u>1. Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> <u>2. Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u>				
OS58.113	General > Plimmerton Farm	Retain PBPfZ-P1 as drafted.				
OS58.114	General > Plimmerton Farm	Retain PBPfZ-P2 as drafted.				
OS58.115	General > Plimmerton Farm	Add a new Precinct B objective as follows: <u>PAPFZ-O3 Infrastructure</u> <u>Public health and safety is maintained through the appropriate provision of infrastructure.</u>				
OS58.116	General > Plimmerton Farm	Add new Precinct B policy as follows: <u>PAPFZ-P6 Servicing</u> <u>Ensure all development is appropriately serviced including wastewater, stormwater, and water supply with sufficient capacity for firefighting purposes.</u>				
OS58.117	General > Plimmerton Farm	Amend PBPfZ-R1, PBPfZ-R2, and PBPfZ-R5 to PBPfZ-R8 as follows:				

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<p>1. Activity Status: Permitted Where: <u>Compliance is achieved with PAPFZ-SX.</u> Activity Status: Restricted Discretionary ... Matters of discretion are restricted to: ... <u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>				
OS58.118	General > Plimmerton Farm	<p>Amend PBPFZ-R10, PBPFZ-R11 and PBPFZ-R12 as follows: Matters of discretion are restricted to: ... <u>x. the extent to which the site is appropriately serviced, including a firefighting water supply, and access to that supply, in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008.</u></p>				
OS58.119	General > Plimmerton Farm	Retain PBPFZ-R4 Signs as drafted.				
OS58.120	General > Plimmerton Farm	Retain PBPFZ-R9 as drafted.				
OS58.121	General > Plimmerton Farm	<p>Amendment to PBPFZ-S1 Height and PBPFZ-S2 Height in Relation to Boundary sought: <u>This standard does not apply to hose drying towers up to 15m in height.</u></p>				
OS58.122	General > Plimmerton Farm	<p>Add a new Precinct B standard as follows: <u>PAPFZ-SX Servicing</u> <u>1. Where a connection to reticulated water supply system is available, all developments must be provided with a water supply, including a firefighting water supply, and access to that supply.</u> <u>2. Where a connection to a reticulated water supply system is unavailable, or where an additional level of service is required that exceeds the level of service provided by the reticulated system, the developer must demonstrate how an alternative and satisfactory water supply, including a firefighting water supply and access to that supply, can be provided to each lot.</u> <u>Further advice and information about how sufficient firefighting water supply, and access to that supply, can be provided can be obtained from Fire and Emergency New Zealand and the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNA PAS 4509:2008</u></p>				
Radio New Zealand						
General and approach to intensification						
OS73.2	Approach to Intensification	<p>[Refer to original submission for full decision requested]</p> <p>While no specific decision sought, the submitter raised the following matter(s): <i>Preliminary feedback provided on the Porirua City Council's draft variation. That feedback, alongside the submitter's response to Council's request for further</i></p>	3.3.1	Accept in part	See body of report	No

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
		<i>information, explains why MDRS standards in close proximity to its transmission infrastructure are inappropriate.</i>				
OS73.3	Approach to Intensification	That the Council have regard to the submitter's Facilities, as a lifeline utility, in a way that ensures RNZ can continue to undertake daily operations, maintenance and upgrades of its facilities as required.	3.3.1	Accept in part	See body of report	No
OS73.4	General	Ensure that these effects [of electromagnetic radiation] are understood and recognised through the Proposed Variation	3.3.1	Accept in part	See body of report	No
Qualifying matters						
OS73.1	Qualifying Matters	Seeks that its facilities at Porirua are recognised as a "qualifying matter" in the Proposed Variation.	3.3.2	Accept in part	See body of report	Yes
OS73.16	Qualifying Matters	The submitter's facilities at Porirua should be included as a "qualifying matter" in the Proposed Variation.	3.3.2	Accept in part	See body of report	Yes
OS73.5	Qualifying Matters	Seeks recognition of its infrastructure as a "qualifying matter" in the Proposed Variation, justifying limits on MDRS height limits for development within a 1,057m radius.	3.3.2	Accept in part	See body of report	Yes
OS73.6	Qualifying Matters	Unrestricted development to MDRS standards should be avoided within these areas as a matter of health and safety, as well as a matter of secure and efficient functioning of radiocommunications.	3.3.2	Accept in part	See body of report	Yes
OS73.7 ³³	Qualifying Matters	Height limits should be the same as existing rules in the operative (and proposed) Porirua District Plan. Within 528 metres of the Porirua Site, there should be no structures above 10 metres in height in order to avoid EMR coupling. Buildings within this area be subject to a 10 metre height limit. Within 1,057 metres of the Porirua Site, the design of any structure above 10 metres in height must include a site-specific and construction materials-specific EMR assessment to ensure the structure does not compromise the safety of workers or occupants. Buildings within this area be restricted to 10 metres in height, unless [the submitter] provides written approval that the site and construction materials are appropriate. It is important that the submitter work with developers to ensure that workers and/or occupants are not exposed to unsafe EMR levels.	3.3.2	Accept in part	See body of report	Yes
OS73.8 ³⁴	Qualifying Matters	<p>Seeks that:</p> <ul style="list-style-type: none"> • Within 528 metres of the Porirua Site, there should be no structures above 10 metres in height; and • Within 1,057 metres of the Porirua Site, the design of any structure above 10 metres in height must include a site-specific and construction materials-specific EMR assessment. <p>The proposed changes apply to all sites within these radii. No other modifications to density standards are sought, as development below 10m is not associated with increased risk. No limits on changed density standards are sought within this height limit.</p>	3.3.2	Accept in part	See body of report	Yes

³³ Opposed by Kāinga Ora [FS76.377]

³⁴ Opposed by Kāinga Ora [FS76.378]

Sub. Ref.	Provision	Decision Requested	Section of this Report where Addressed	Officer's Recommendation	Officers' Reasons/Comments	Recommended Amendments to PDP?
OS73.9 ³⁵	Qualifying Matters	Seeks recognition of its radiocommunication activities at Porirua as a qualifying matter in the Proposed Variation, justifying height limits of 10m as opposed to the 11m permitted under MDRS. Also suggests a stronger policy framework to recognise the importance of qualifying matters and why they justify restrictions on MDRS.	3.3.2	Accept in part	See body of report	Yes
Specific amendments						
OS73.11 ³⁶	Qualifying matters	New qualifying matter <u>"Radiocommunication Transmission – requires modification to permitted building and structure heights to manage the effects of electromagnetic radiation."</u>	3.3.3	Accept in part	See body of report	No
OS73.12 ³⁷	RESZ - General Objectives and Policies for all Residential Zones	Insert additional text to reference RNZ's proposed qualifying matter for Radiocommunication Transmission and to recognise that additional controls are necessary to mitigate the adverse effects resulting from taller buildings in close proximity to RNZ's transmission infrastructure.	3.3.3	Accept in part	See body of report	No
OS73.13 ³⁸	RESZ - General Objectives and Policies for all Residential Zones > New Provision	New Policy RESZ-PX Height Control – Radiocommunication Transmission <u>On sites identified on the planning maps as being subject to Height Control – Radiocommunication Transmission, limit the height of buildings and structures to 10 metres unless, on consultation with Radio New Zealand, it can be demonstrated that:</u> <u>1. The building or structure is located 528 metres or more from Radio New Zealand's radiocommunication Facilities ;and</u> <u>2. The building or structure is constructed of materials that comply with electromagnetic radiation standards."</u>	3.3.3	Accept in part	See body of report	Yes
OS73.14 ³⁹	MRZ-S2	1. Buildings and structures must not exceed a height of: a. ... i. <u>10m on sites subject to Height Control – Radiocommunication Transmission, as identified on the planning maps.</u> Matters of discretion restricted to: ... 1. <u>The matters in REZ-PX Height Control – Radiocommunication Transmission.</u>	3.3.3	Accept in part	See body of report	Yes
OS73.15 ⁴⁰	Planning Maps > New Provision	Amend planning maps to identify sites subject to RNZ's proposed Radiocommunication Transmission qualifying matter. The spatial extent required is demonstrated by the yellow line: [Refer to original submission for full reason, including figure]	3.3.3	Accept	See body of report	Yes

³⁵ Opposed by Kāinga Ora [FS76.379]³⁶ Opposed by Kāinga Ora [FS76.380]³⁷ Opposed by Kāinga Ora [FS76.381]³⁸ Opposed by Kāinga Ora [FS76.382]³⁹ Opposed by Kāinga Ora [FS76.383]⁴⁰ Opposed by Kāinga Ora [FS76.384]

Appendix C. Affected Allotments

REF.	LEGAL DESCRIPTION	TITLES	ADDRESS
1.	Lot 1 DP 424232	494187	74 Owhiti Street
2.	Lot 70 DP 7626	WN365/257	22 Thornley Street
3.	Lot 71 DP 18091	WN47D/631	31 Morere Street
4.	Lot 1 DP 82799	WN49C/150	9A Bay Drive
5.	Lot 1 DP 24149	WNB3/775	27 Terrace Road
6.	Lot 29 DP 17379	WN51A/113	54 Jillett Street
7.	Lot 26 DP 24876	WN11A/444	20 Paenui Street
8.	Lot 3 DP 23728	WN14A/695, WN14B/285, WN14B/961, WN15A/339	7A Terrace Road
9.	Lot 74 DP 25036	WN50A/400	47 Owhiti Street
10.	Lot 59 DP 24876	WN46B/935	1 Moulst Street
11.	Lot 2 DP 334894	142957	20A Richard Street
12.	Lot 79 DP 24239	WN21B/338	121 Dimock Street
13.	Lot 5 DP 17689	WN12C/14	68 Dimock Street
14.	Lot 74 DP 24239	WN13D/1351	131 Dimock Street
15.	Lot 1 DP 24824	WNB3/1401	28 Whanake Street
16.	Lot 33 DP 17689	WN51C/928	17 Downes Street
17.	Lot 76 DP 24239	WN24A/364	127 Dimock Street
18.	Lot 26 DP 7626	WN626/98	35 Whanake Street
19.	Lot 11 DP 10462	WN12D/545, WN12D/546, WN12D/547, WN12D/548, WN12D/549	1D Herewini Street
20.	Lot 10 DP 1072	WN542/269	2 Lambley Road
21.	Lot 3 DP 10462	WN479/198	13 Herewini Street
22.	Lot 56 DP 25036	WN49B/485	134B Dimock Street
23.	Lot 78 DP 25036	WN49B/490	15K Owhiti Street
24.	Lot 30 DP 17379	WNF3/908	56A Jillett Street
25.	Lot 2 DP 27461	WN50C/698	17 Kapiti Crescent
26.	Lot 1 DP 27461	WN5B/608	15 Kapiti Crescent
27.	Lot 81 DP 25036	WN49B/493	3 Owhiti Street
28.	Lot 77 DP 25036	<Null>	15L Owhiti Street
29.	Lot 22 DP 17689	WN26A/820	43 Downes Street
30.	Lot 19 DP 17379	WNC2/424	30 Jillett Street
31.	Lot 2 DP 22011	WN900/54	5 John Street
32.	Lot 73 DP 1072	WN43C/605, WN43C/606, WN43C/607, WN43C/608	17C John Street
33.	Lot 1 DP 9929, Lot 4 DP 30452	WN20B/183, WN46C/194, WN46C/195, WN20B/183, WN46C/194, WN46C/195	11 Lambley Road
34.	Lot 70 DP 24239	WN16D/645	56 Herewini Street
35.	Lot 30 DP 7626	WN497/227	27 Whanake Street
36.	Lot 17 DP 7626	WN486/252	32 Richard Street
37.	Lot 46 DP 24048, Lot 47 DP 24048	WN54C/637, WN54C/637	44 Herewini Street
38.	Lot 2 DP 60279	WN30D/14	2 Main Road
39.	Lot 1 DP 76369	WN44C/363	21 Herewini Street
40.	Lot 1 DP 373592	297056	2 Kapiti Crescent
41.	Lot 20 DP 10462	WN506/156	6 Herewini Street
42.	Lot 36 DP 24876	WN47D/916	101 Dimock Street
43.	Lot 1 DP 83692	WN51B/157, WN51B/158, WN51B/159, WN51B/160	8 Richard Street
44.	Lot 6 DP 24937	WN27B/955	71 Dimock Street

45.	Lot 35 DP 24048	WN9D/513	24 Herewini Street
46.	Lot 75 DP 25036	WN49B/488	43 - 45 Owhiti Street
47.	Lot 1 DP 480094	670401	92 Dimock Street
48.	Lot 1 DP 50458	WN27A/759	34A Downes Street
49.	Lot 28 DP 24048	WN47D/894	31B Herewini Street
50.	Lot 22 DP 24876	WNC1/1496	17 Paenui Street
51.	Lot 3 DP 24149	WNC3/1397	13A Lambley Road
52.	Lot 2 DP 480094	670402	92A Dimock Street
53.	Lot 19 DP 50459	WN27D/654, WN27D/655, WN27D/656, WN27D/657, WN27D/658, WN27D/659	35 Rothwell Street
54.	Lot 4 DP 24876	WN33A/33	59 Jillett Street
55.	Lot 76 DP 25036	WN49B/489	140A Dimock Street
56.	Lot 4 DP 29446	WN32D/835, WN32D/836	8 Owhiti Street
57.	Lot 25 DP 17689	WN20B/159	37 Downes Street
58.	Lot 19 DP 25036	WN50A/381	54 Owhiti Street
59.	Lot 2 DP 456381	589742	2 Park Avenue
60.	Lot 14 DP 24937	WN52D/99	55 Dimock Street
61.	Lot 3 DP 351266	210042	44A Owhiti Street
62.	Lot 59 DP 17379	WN15C/970	7A Morere Street
63.	Lot 29 DP 1072	WN14D/288, WN14D/289, WN14D/290, WN14D/291, WN14D/292	Flat 5/18 Lambley Road
64.	Lot 8 DP 28830	WN46C/614	18 Morere Street
65.	Lot 63 DP 25036	WN50A/394	61 Owhiti Street
66.	Lot 2 DP 18452	WN40C/556, WN40C/557, WN40C/558, WN40C/559, WN40C/560, WN40C/561, WN40C/562, WN40C/563, WN40C/564	11 Jillett Street
67.	Lot 2 DP 550202	947711	26B Thornley Street
68.	Lot 81 DP 1072	WN18C/919, WN18C/920, WN18C/921, WN18C/922, WN18C/923	Flat 3/16 John Street
69.	Lot 2 DP 346270	190160	55A Herewini Street
70.	Lot 30 DP 25036	WN26B/988	32 Owhiti Street
71.	Lot 7 DP 24048	WN30C/328	149 Dimock Street
72.	Lot 14 DP 1072	WN43A/986, WN43A/987	6A Lambley Road
73.	Lot 2 DP 41084	WN12D/1405	Flat 5/51 Dimock Street
74.	Lot 1 DP 353414	218429	50 Owhiti Street
75.	Lot 3 DP 15891	WN579/294	11 Terrace Road
76.	Lot 101 DP 18092	WN47D/626	45 Dimock Street
77.	Lot 77 DP 24239	WN26C/215	125 Dimock Street
78.	Lot 9 DP 470196	634651	30A Morere Street
79.	Lot 3 DP 346270	190161	55B Herewini Street
80.	Lot 99 DP 1072	WN152/21	12 Bay Drive
81.	Lot 3 DP 40669	WN46C/282	74A Dimock Street
82.	Lot 2 DP 28392	WN5C/1075	8A John Street
83.	Lot 52 DP 25036	WN50C/576	6 Owhiti Street
84.	Lot 1 DP 58427	WN28B/227	19 Whanake Street
85.	Lot 13 DP 42707	WN25C/581	7 Keith Hart Grove
86.	Lot 2 DP 405836	420419	19A Richard Street
87.	Lot 23 DP 9417	WN507/58	15A - 15B Main Road
88.	Lot 1 DP 60279	WN38C/986, WN38C/987	4B Main Road
89.	Lot 5 DP 42707	WN49D/873	13 Moulton Street
90.	Lot 2 DP 24824	WNB3/1402	28A Whanake Street

91.	Lot 25 DP 17379	WN51A/110	42 Jillett Street
92.	Lot 2 DP 23865	WNB1/537	28 Bay Drive
93.	Lot 5 DP 24876	WN36C/788	61 Jillett Street
94.	Lot 12 DP 17689	WN51D/789	82 Dimock Street
95.	Lot 2 DP 302449	9561	9 Richard Street
96.	Lot 83 DP 25036	<Null>	69L Owhiti Street
97.	Lot 17 DP 24876	WN49B/500	7 Paenui Street
98.	Lot 53 DP 24876	WN46B/931	112 Dimock Street
99.	Lot 2 DP 76369	WN44C/364	19B Herewini Street
100.	Lot 71 DP 24239	WN39A/741	62 Herewini Street
101.	Lot 2 DP 78628, Lot 1 DP 78628	WN45A/830, WN45A/829	15 Bay Drive
102.	Lot 11 DP 1072	WN604/256	30 Bay Drive
103.	Lot 57 DP 9622	WN46C/707, WN46C/708, WN46C/709, WN46C/710, WN8C/223, WN8C/224, WN8C/296	Flat 1/14 Jillett Street
104.	Lot 5 DP 7626	WN522/3	22 Lambley Road
105.	Lot 12 DP 24876	WN49B/502	91 Dimock Street
106.	Lot 56 DP 9622	WN9A/506, WN9A/507, WN9A/508, WN9A/509, WN9A/751, WN9A/752, WN9B/1240, WN9C/1465	Flat 4/12 Jillett Street
107.	Lot 2 DP 393972	376054	7B Richard Street
108.	Lot 20 DP 24876, Lot 1 DP 30670	WN20A/336, WN20A/336	13 Paenui Street
109.	Lot 42 DP 25036	WN36D/293	4 Shelley Street
110.	Lot 17 DP 50459	WN25A/12	19 Rothwell Street
111.	Lot 13 DP 24937	WN52D/98	57 Dimock Street
112.	Lot 51 DP 17689	WN47D/809	36 Downes Street
113.	Lot 1 DP 81180	WN47C/638	43B Herewini Street
114.	Lot 2 DP 405104	417841	17B Richard Street
115.	Lot 24 DP 17689	WNA2/790	39 Downes Street
116.	Part Lot 27 DP 1072, Part Lot 28 DP 1072	WN279/219, WN279/219	3 John Street
117.	Lot 78 DP 1072	WN126/57	19 John Street
118.	Lot 43 DP 25036	WN7A/871	24 Owhiti Street
119.	Lot 16 DP 1072	WN28B/773, WN28B/774	8 Lambley Road
120.	Lot 22 DP 9417	WN461/293	17 Main Road
121.	Lot 15 DP 9622	WN509/37	5 Jillett Street
122.	Lot 3 DP 34391	WN11C/162, WN11C/163, WN11C/164	Flat 3/3 Vella Street
123.	Lot 1 DP 30880	WN7C/927	15A Jillett Street
124.	Lot 27 DP 17689	WN46C/742	33 Downes Street
125.	Lot 1 DP 393164	373175	48 Downes Street
126.	Lot 49 DP 17379	WN25B/411	8 Murphy Place
127.	Lot 29 DP 24048	WN41A/732	27 Herewini Street
128.	Lot 1 DP 46303	WN18B/907	6 Main Road
129.	Lot 1 DP 16943	WN19A/1009, WN19A/1010, WN19A/1011, WN19A/1012, WN19A/1013, WN19A/1014	Flat 6/22 Richard Street
130.	Lot 23 DP 50458	<Null>	15 Rothwell Street
131.	Lot 59 DP 9622	WN803/55	12 Kapiti Crescent

132.	Lot 4 DP 26813	WN51D/794	13A Morere Street
133.	Lot 26 DP 17379	WN51A/111	48 Jillett Street
134.	Lot 2 DP 26550	WND3/43	15 Thornley Street
135.	Lot 41 DP 17379	WN20D/778	27 Jillett Street
136.	Lot 18 DP 42707	WN49D/872	8 Keith Hart Grove
137.	Lot 5 DP 24048	WN45C/810	153 Dimock Street
138.	Lot 1 DP 87418	WN55A/70	53 Owhiti Street
139.	Lot 55 DP 25036	WN49B/484	1 Owhiti Street
140.	Lot 1 DP 40669	WN49B/466	27 - 29 Downes Street
141.	Lot 3 DP 556899	974498	3/1 Murphy Place
142.	Lot 48 DP 17379	WN47D/812	7 Murphy Place
143.	Lot 96 DP 1072	WN253/175	4 Thornley Street
144.	Lot 41 DP 17689	WN19D/1281	56 Downes Street
145.	Lot 8 DP 470196	634650	28A Morere Street
146.	Lot 61 DP 7626	WND3/1031	38A Thornley Street
147.	Lot 1 DP 348312	198317	3 Main Road
148.	Lot 1 DP 407528	426444	37 Whanake Street
149.	Lot 3 DP 7626	WN515/264	26 Lambley Road
150.	Lot 80 DP 1072	WN113/71	14 John Street
151.	Lot 42 DP 17379	WN8C/518	29 Jillett Street
152.	Lot 18 DP 50459	476964, WN30C/91, WN30C/94, WN30C/95, WN30C/96, WN30C/97, WN30C/99, WN47B/509, WN47B/510	21D Rothwell Street
153.	Lot 16 DP 10462	WN502/200	14 Herewini Street
154.	Lot 47 DP 17379	WN47D/811	5 Murphy Place
155.	Lot 13 DP 24876	WN49B/503	93A Dimock Street
156.	Lot 75 DP 1072	WN829/87	22 Whanake Street
157.	Lot 64 DP 25036	WN50A/395	81 Owhiti Street
158.	Lot 2 DP 50558	WN50C/266	57A Herewini Street
159.	Lot 1 DP 84160	WN51B/778	69 Dimock Street
160.	Lot 2 DP 387504	350232	6A Richard Street
161.	Lot 63 DP 24239	WN21B/910	30 Paenui Street
162.	Lot 5 DP 1072	WN11D/1371, WN11D/1372, WN11D/1373, WN11D/1374, WN11D/1375, WN11D/1376, WN12C/1440, WN12C/380, WN12C/910, WN13A/1385	Flat 5/20 Bay Drive
163.	Lot 2 DP 30249	WN7B/572	8A Whanake Street
164.	Lot 2 DP 34391	WN10D/1128	2 Vella Street
165.	Lot 54 DP 25036	WN50C/577	2 Owhiti Street
166.	Lot 15 DP 10462	WN498/1	16 Herewini Street
167.	Lot 6 DP 10462	WN560/217	7 Herewini Street
168.	Lot 39 DP 41909	WN23A/377	154 Gloaming Hill
169.	Lot 16 DP 25036	WN41B/134	60 Owhiti Street
170.	Lot 1 DP 28141, Lot 2 DP 28141	WN17B/448, WN17B/449, WN17B/450, WN17B/451, WN17B/452, WN17B/453, WN17B/454, WN17B/455, WN17B/456, WN17B/448, WN17B/449, WN17B/450, WN17B/451, WN17B/452,	Flat 8/12 Thornley Street

		WN17B/453, WN17B/454, WN17B/455, WN17B/456	
171.	Lot 10 DP 9622	WN46A/351, WN46A/352	8 Kapiti Crescent
172.	Lot 34 DP 24876	WN21B/591	4 Paenui Street
173.	Lot 18 DP 17379	WN11A/344	28 Jillett Street
174.	Lot 57 DP 24239	WN41C/659	23 Paenui Street
175.	Lot 31 DP 7626	WN541/236	25 Whanake Street
176.	Lot 4 DP 7626	WN17C/894, WN17D/354, WN17D/355, WN17D/356	Flat 3/24 Lambley Road
177.	Lot 70 DP 1072	WN131/210	14 Whanake Street
178.	Lot 3 DP 30249	WN7A/1467	7 Thornley Street
179.	Lot 30 DP 24048	WN17D/1133	25 Herewini Street
180.	Lot 30 DP 9417	WN649/71	1 Main Road
181.	Lot 1 DP 558631	981507	34 Jillett Street
182.	Lot 63 DP 7626	WN700/17	34 Thornley Street
183.	Lot 2 DP 1072, Lot 1 DP 1072	WN30B/236, WN30B/237, WN30B/238, WN46A/196, WN30B/236, WN30B/237, WN30B/238, WN46A/196	16 Bay Drive
184.	Lot 1 DP 23865	1034260, 1034261, WN28A/339, WN28A/340, WN28A/341, WN28A/344, WN28A/345, WN28A/346	1A Richard Street
185.	Lot 1 DP 346270	190159	55 Herewini Street
186.	Lot 31 DP 24876	WN39A/55	10 Paenui Street
187.	Lot 2 DP 570564	1031123	10A Main Road
188.	Lot 1 DP 366431	269218	20 Owhiti Street
189.	Lot 2 DP 75712	WN42D/817	70 Owhiti Street
190.	Lot 8 DP 17689	WN51C/927	74 Dimock Street
191.	Lot 59 DP 1072	WN38D/477, WN493/300	10A Richard Street
192.	Lot 1 DP 24048	WN18D/1276	161 Dimock Street
193.	Lot 12 DP 10462	WN468/138	22 Herewini Street
194.	Lot 53 DP 25036	WN36C/19	4 Owhiti Street
195.	Lot 1 DP 334340	140712	10 Lambley Road
196.	Lot 54 DP 7626	WN391/294	31 Thornley Street
197.	Lot 19 DP 24048	WN11B/404	47 Herewini Street
198.	Lot 18 DP 25036	WN24D/478	56 Owhiti Street
199.	Lot 32 DP 24876	WNB4/1377	8 Paenui Street
200.	Lot 1 DP 27489	WN30B/209	5 Kapiti Crescent
201.	Lot 58 DP 24876	WN46B/934	102 Dimock Street
202.	Lot 2 DP 345251	185453	17A Terrace Road
203.	Lot 1 DP 335913	147318	13 Main Road
204.	Lot 1 DP 17795, Part Lot 2 DP 17795	WNF3/889, WNF3/889	39 Whanake Street
205.	Lot 72 DP 1072	WN246/124	15 John Street
206.	Lot 48 DP 24048	718354	46A Herewini Street
207.	Lot 55 DP 24239	WN24D/182	27 Paenui Street
208.	Lot 4 DP 9622	WN527/198	5B Bay Drive
209.	Lot 19 DP 42707	WN48C/826	6 Keith Hart Grove
210.	Lot 24 DP 17379	WN25C/282	40 Jillett Street
211.	Lot 2 DP 335228	144328	27A Richard Street
212.	Lot 23 DP 24876	WN30D/944	19 Paenui Street
213.	Lot 66 DP 1072	WN204/98	3 Whanake Street
214.	Lot 44 DP 24048	WN23B/225	40 Herewini Street
215.	Lot 1 DP 493339	719272	23 Herewini Street
216.	Lot 2 DP 558631	981508	34A Jillett Street

217.	Lot 22 DP 25036	WN33A/974	48 Owhiti Street
218.	Lot 2 DP 7626	WN20B/713	28 Lambley Road
219.	Lot 87 DP 1072	WN19C/1283, WN19C/1284, WN19C/1285, WN19C/1286, WN19C/1287, WN19C/1288	Flat 6/16 Thornley Street
220.	Lot 27 DP 9417	WN599/261	7 Main Road
221.	Lot 60 DP 1072	WN50A/896	9 Whanake Street
222.	Lot 11 DP 24876	WN49B/501	87 Dimock Street
223.	Lot 2 DP 495001	726416	21 Whanake Street
224.	Lot 14 DP 7626	WN595/73	38 Richard Street
225.	Lot 6 DP 1072	WN13B/1055, WN13B/1344, WN14A/1141, WN15A/1062, WN15A/1068, WN15B/281	Flat 10/22 Bay Drive
226.	Lot 101 DP 1072	WN41D/524, WN41D/827	8A Bay Drive
227.	Lot 74 DP 7626	<Null>	46 Richard Street
228.	Lot 9 DP 14845	WN23D/792, WN30B/499	Flat 1/23 Kapiti Crescent
229.	Lot 14 DP 17689	WN16B/106	86 Dimock Street
230.	Lot 77 DP 1072	WN788/8	17 Thornley Street
231.	Lot 4 DP 42707	WN31C/622	11 Moulton Street
232.	Lot 61 DP 24876	WN21C/386	5 Moulton Street
233.	Lot 39 DP 24876	WN24B/219	107 Dimock Street
234.	Lot 2 DP 480295	731270	14 Lambley Road
235.	Lot 61 DP 25036	WN50A/392	144A - 144B Dimock Street
236.	Lot 37 DP 17379	WN37B/348	19 Jillett Street
237.	Lot 55 DP 9622	WN19C/1002, WN19C/1003, WN19C/1004, WN19C/1005, WN19C/1006, WN19C/1007	1 Mana Avenue
238.	Lot 3 DP 404341	414951	61C Herewini Street
239.	Lot 16 DP 42707	WN26C/704	12 Keith Hart Grove
240.	Lot 98 DP 1072	WN264/296	14 Bay Drive
241.	Lot 38 DP 24048	WN20B/637	30 Herewini Street
242.	Lot 52 DP 24239	WN39B/687	33 Paenui Street
243.	Lot 2 DP 83705	WN50D/551	24 Richard Street
244.	Lot 1 DP 28830	WN36A/844, WN37B/36	4A Morere Street
245.	Lot 1 DP 9417	WN411/279	11 Bay Drive
246.	Lot 11 DP 17689	WN21D/150	78 Dimock Street
247.	Lot 2 DP 383796	334728	15 Whanake Street
248.	Lot 23 DP 17379	WN30D/430	38 Jillett Street
249.	Lot 26 DP 17689	WN51D/790	35 Downes Street
250.	Lot 39 DP 24048, Lot 5 DP 333842	138640, 138640	32 Herewini Street
251.	Lot 2 DP 377031	309631	117A Dimock Street
252.	Lot 29 DP 25036	WN23D/78	34 Owhiti Street
253.	Lot 58 DP 1072	WN35A/259, WN35A/260, WN35A/261	11 Whanake Street
254.	Lot 1 DP 14869, Lot 5 DP 60279	WN566/167, WN30D/17	19 Bay Drive
255.	Lot 53 DP 7626	WN406/14	33 Thornley Street

256.	Lot 9 DP 24876	WN37B/10	81 Dimock Street
257.	Lot 49 DP 24048	<Null>	48 Herewini Street
258.	Lot 1 DP 8547	WN481/182	25 Lambley Road
259.	Lot 1 DP 21570	WN888/86	2A Thornley Street
260.	Lot 36 DP 24048	WN39B/9	26 Herewini Street
261.	Lot 53 DP 1072	WN252/114	11 John Street
262.	Lot 4 DP 393164	373178	46A Downes Street
263.	Lot 2 DP 333842	138637	4A Murphy Place
264.	Lot 62 DP 24876	WN42A/580	7 Moulst Street
265.	Lot 2 DP 25036	WN17D/176	160 Dimock Street
266.	Lot 20 DP 6944, Lot 21 DP 6944, Part Lot 22 DP 6944	WN494/275, WN494/275, WN494/275	18 Main Road
267.	Lot 1 DP 72725	WN40C/108	18 John Street
268.	Lot 17 DP 25036	WN50A/380	58 Owhiti Street
269.	Lot 1 DP 417842	468744	25 Morere Street
270.	Lot 69 DP 18091	WN47D/630	27 Morere Street
271.	Lot 1 DP 75712	WN42D/816	76 Owhiti Street
272.	Lot 52 DP 1072	WN124/190	9 John Street
273.	Lot 1 DP 404341	414949	143 Dimock Street
274.	Lot 1 DP 15891	WN579/293	15 Terrace Road
275.	Part Lot 42 DP 1072	WN116/98	9 Terrace Road
276.	Lot 1 DP 422196	485322	34 Morere Street
277.	Lot 89 DP 1072	WN245/230	11 Thornley Street
278.	Lot 3 DP 84160	WN51B/780	65 Dimock Street
279.	Lot 25 DP 24876	WNB4/1120	22 Paenui Street
280.	Lot 30 DP 1072	WN50B/832, WN50B/833	20 Lambley Road
281.	Lot 16 DP 17689	WN30A/657	90B Dimock Street
282.	Lot 2 DP 348312	198318	13 Bay Drive
283.	Lot 11 DP 42707	WN50A/656	3 Keith Hart Grove
284.	Lot 14 DP 10462	WN545/173	18 Herewini Street
285.	Lot 42 DP 7626	WN474/24	32 Whanake Street
286.	Lot 1 DP 435866	533848	5 - 5A Vella Street
287.	Lot 2 DP 30922	WN47D/624	29 Morere Street
288.	Lot 1 DP 42707	WN33B/855	47 Downes Street
289.	Lot 33 DP 24876	WN21A/965	6 Paenui Street
290.	Lot 19 DP 28831	WN36A/853	40 Morere Street
291.	Lot 17 DP 6944	WN404/132	14 Main Road
292.	Lot 2 DP 323300	93512	37A Thornley Street
293.	Lot 11 DP 14845	WN50C/696	19 Kapiti Crescent
294.	Lot 1 DP 45551	WN16D/270	2 John Street
295.	Lot 69 DP 1072	WN417/297	12 Whanake Street
296.	Lot 2 DP 87418	WN55A/71	51 Owhiti Street
297.	Lot 1 DP 28392	WN5C/1074	8 John Street
298.	Lot 58 DP 7626	WN433/4	23 Thornley Street
299.	Lot 2 DP 12634	WN503/139	39 Terrace Road
300.	Lot 50 DP 24048	WN34B/830	37 Paenui Street
301.	Lot 5 DP 29446, Lot 36 DP 25036, Lot 39 DP 25036, Part Lot 1 DP 10900, Lot 37 DP 25036, Lot 38 DP 25036	WN26B/990, WN26B/990, WN26B/990, WN26B/990, WN26B/990, WN26B/990	47 Thornley Street
302.	Lot 72 DP 18091	WN23D/202	33 Morere Street
303.	Lot 11 DP 24937	WN17C/442	61 Dimock Street
304.	Lot 1 DP 481859	676844	41 Herewini Street

305.	Lot 2 DP 316138	63105	31A Richard Street
306.	Lot 2 DP 508586	774087	12A Richard Street
307.	Lot 2 DP 74191	WN42A/625	37B Herewini Street
308.	Lot 1 DP 40964	WN12D/124	6 John Street
309.	Lot 5 DP 28830	WN36A/846	12 Morere Street
310.	Lot 8 DP 10462	WN513/143	3 Herewini Street
311.	Lot 1 DP 88344	WN55D/348	5A Paenui Street
312.	Lot 79 DP 25036	WN49B/491	13 Owhiti Street
313.	Lot 2 DP 78628	WN45A/830	15A Bay Drive
314.	Lot 7 DP 17689	WNF2/1045	72 Dimock Street
315.	Lot 41 DP 24876	WN20D/561	111 Dimock Street
316.	Lot 65 DP 25036	WN50A/396	152A - 152B Dimock Street
317.	Lot 37 DP 7626	WN491/178	42 Whanake Street
318.	Lot 16 DP 24048	WN20A/1359	53 Herewini Street
319.	Lot 2 DP 54647	WN25B/79	59A Herewini Street
320.	Lot 10 DP 470196	634652	32A Morere Street
321.	Lot 3 DP 555774	968795	4B Kapiti Crescent
322.	Lot 29 DP 7626	WN434/256	29 Whanake Street
323.	Lot 53 DP 24239	WN10C/195	31 Paenui Street
324.	Lot 1 DP 83705	WN50D/550	3 Wright Street
325.	Lot 2 DP 351266	210041	46 Owhiti Street
326.	Lot 11 DP 470196	634653	32 Morere Street
327.	Lot 15 DP 17689	WN28C/349	88B Dimock Street
328.	Lot 58 DP 17379	WN44A/871	5 Morere Street
329.	Lot 76 DP 1072, Part Reserve Deposited Plan 1072	WN760/6, WN760/6	19 Thornley Street
330.	Lot 60 DP 24876	WNB4/1378	3 Moulton Street
331.	Lot 19 DP 17689	WN20C/949	96 Dimock Street
332.	Lot 5 DP 24937	WN19B/669	73 Dimock Street
333.	Lot 39 DP 17379	WN18D/323	23 Jillett Street
334.	Lot 2 DP 20200	WNB4/917	3 Lambley Road
335.	Lot 2 DP 31275	WN8A/259	31A Whanake Street
336.	Part Lot 51 DP 1072	WN244/242	18 Richard Street
337.	Lot 102 DP 9622	WN28D/497	9 Kapiti Crescent
338.	Lot 7 DP 26813	WN51D/797	15B Morere Street
339.	Lot 12 DP 24937	WN33C/94	59 Dimock Street
340.	Lot 5 DP 470196	634647	24A Morere Street
341.	Lot 14 DP 25036	WN50A/378	64 Owhiti Street
342.	Lot 2 DP 33991	WN23B/61	52 Herewini Street
343.	Lot 1 DP 555774	968793	4 Kapiti Crescent
344.	Lot 10 DP 10462	WN38A/855, WN38A/856	4B Bay Drive
345.	Lot 38 DP 24876	WN41D/330	105 Dimock Street
346.	Lot 25 DP 25036	WN10A/1379	42 Owhiti Street
347.	Part Reserve Deposited Plan 1072, Lot 88 DP 1072	WN6D/1072, WN6D/1072	18 Thornley Street
348.	Lot 40 DP 24048	WN29C/768	34 Herewini Street
349.	Lot 3 DP 28141	WNF2/454	10 Thornley Street
350.	Lot 36 DP 17379	WN51A/114	17 Jillett Street
351.	Lot 48 DP 7626	WN537/264	43 Thornley Street
352.	Lot 1 DP 508586	774086	12 Richard Street
353.	Lot 2 DP 492206	714739	26 Bay Drive
354.	Part Reserve Deposited Plan 1072	WNA2/906	Richard Street

355.	Lot 4 DP 556899	974499	4/1 Murphy Place
356.	Lot 7 DP 7626	WN522/1	29 Richard Street
357.	Lot 12 DP 1072	WN21C/221, WN21C/222	4A Lambley Road
358.	Lot 16 DP 9622	WN517/186	3 Jillett Street
359.	Lot 1 DP 22011	WN900/55	5A John Street
360.	Lot 13 DP 14845	WN50C/697	13 Kapiti Crescent
361.	Lot 1 DP 91092	WN59A/183	136B Dimock Street
362.	Lot 10 DP 42707	WN50A/823	1 Keith Hart Grove
363.	Lot 15 DP 24876	WN24A/886	3 Paenui Street
364.	Lot 42 DP 24876	WN32D/624	113 Dimock Street
365.	Lot 3 DP 52475	WN21C/672	28 Thornley Street
366.	Part Section 186 Porirua DIST, Part Section 186 Porirua DIST, Lot 6 DP 29446	WN8B/1004, , WN8B/1004	47 Thornley Street
367.	Lot 38 DP 7626	WN484/151	40 Whanake Street
368.	Lot 75 DP 41909	WN19B/545	32 Rothwell Street
369.	Lot 62 DP 1072	WN112/159	7 Whanake Street
370.	Lot 4 DP 28830	WN46C/612	10 Morere Street
371.	Lot 4 DP 24937	WN25A/382	75 Dimock Street
372.	Lot 18 DP 28831	511786	38 Morere Street
373.	Lot 80 DP 24239	WN16D/561	119 Dimock Street
374.	Part Lot 37 DP 1072	WN498/7	21 Terrace Road
375.	Lot 2 DP 50458	WN25A/913	34 Downes Street
376.	Lot 6 DP 24048	WN37B/804	151 Dimock Street
377.	Lot 1 DP 24937	WN26D/397	62 Jillett Street
378.	Lot 49 DP 7626	WN37A/689, WN37A/690	41 Thornley Street
379.	Lot 1 DP 20314	WND3/325	24 Jillett Street
380.	Lot 2 DP 81180	WN47C/639	43A Herewini Street
381.	Lot 21 DP 17689	WN51D/787	45 Downes Street
382.	Lot 43 DP 24048	WN19C/593	38 Herewini Street
383.	Lot 1 DP 26813	WN51D/791	9 Morere Street
384.	Lot 3 DP 42707	WN50A/867	51 Downes Street
385.	Lot 29 DP 24876	WN7D/1300	14 Paenui Street
386.	Lot 65 DP 24876	WN20A/1292	8 Moulton Street
387.	Lot 7 DP 28830	WN36A/847	16 Morere Street
388.	Lot 32 DP 7626	WN479/97	2 Wright Street
389.	Lot 55 DP 17379	WN14B/920	45 Jillett Street
390.	Lot 4 DP 470196	634646	24 Morere Street
391.	Lot 3 DP 366431	269219	20A Owhiti Street
392.	Lot 12 DP 42707	WN26B/694	5 Keith Hart Grove
393.	Lot 1 DP 85205	WN53A/718	32 Thornley Street
394.	Lot 6 DP 556899	974501	6/1 Murphy Place
395.	Lot 1 DP 375134	302475	7 Lambley Road
396.	Lot 17 DP 17379	WN25B/409	26 Jillett Street
397.	Lot 2 DP 20182	WN23C/276	13 Downes Street
398.	Lot 58 DP 24239, Lot 114 DP 17379, Lot 32 DP 17379, Lot 41 DP 24048, Section 1 SO 23921, Section 2 SO 23921	1011325, 1059797, 1011325, 1059797, 1011325, 1059797, 1011325, 1059797, 1011325, 1059797	47 Jillett Street
399.	Lot 56 DP 24876	WN41D/329	106 Dimock Street
400.	Lot 91 DP 1072	WN171/215	9 Thornley Street
401.	Lot 7 DP 1072	WN478/91	24 Bay Drive

402.	Lot 54 DP 24876	WN46B/932	110 Dimock Street
403.	Lot 3 DP 377031	309632	115A Dimock Street
404.	Lot 64 DP 24239	WN22A/97	32 Paenui Street
405.	Lot 2 DP 539642	902819	16 Main Road
406.	Lot 1 DP 556899	974496	1/1 Murphy Place
407.	Lot 2 DP 556899	974497	2/1 Murphy Place
408.	Lot 3 DP 75712	WN42D/818	72 Owhiti Street
409.	Lot 72 DP 24239	WN12C/56	135 Dimock Street
410.	Lot 1 DP 34020	WN32D/293	22 Jillett Street
411.	Lot 47 DP 7626	WN35C/298, WN42A/137	45A Thornley Street
412.	Lot 1 DP 30249	WN7B/573	8 Whanake Street
413.	Lot 2 DP 72725	WN40C/109	17 Herewini Street
414.	Lot 2 DP 42707	WN50C/749	49 Downes Street
415.	Lot 3 DP 26813	WN51D/793	11B Morere Street
416.	Lot 58 DP 9622	WNB1/1317	16 Jillett Street
417.	Lot 1 DP 495001	726415	1 Wright Street
418.	Lot 1 DP 29446	WN56A/219	14 Owhiti Street
419.	Lot 9 DP 9622	WN549/97	6 Kapiti Crescent
420.	Lot 6 DP 26813	WN51D/796	15A Morere Street
421.	Lot 20 DP 17379	WN14A/500	32 Jillett Street
422.	Lot 1 DP 405104	417840	17 Richard Street
423.	Lot 2 DP 86710	WN54B/280	141 Dimock Street
424.	Lot 1 DP 539642	902818	1 Park Avenue
425.	Lot 3 DP 480295	731271	16 Lambley Road
426.	Lot 55 DP 7626	WN484/86	29 Thornley Street
427.	Lot 80 DP 25036	WN49B/492	7 Owhiti Street
428.	Lot 56 DP 17379	WN46B/636	1 Morere Street
429.	Lot 50 DP 1072	WN252/113	17 Whanake Street
430.	Lot 7 DP 26813, Lot 6 DP 26813	WN51D/797, WN51D/796	15A - 15B Morere Street
431.	Lot 2 DP 88344	WN55D/349	5B Paenui Street
432.	Lot 45 DP 24048	WN9C/888	42 Herewini Street
433.	Lot 1 DP 304151	16665	40 Richard Street
434.	Lot 6 DP 17689	WND1/905	70 Dimock Street
435.	Lot 52 DP 24876	WN46B/930	114 Dimock Street
436.	Lot 1 DP 492206	714738	2 Richard Street
437.	Lot 12 DP 25036	WN26C/135	68 Owhiti Street
438.	Lot 2 DP 353414	218430	50A Owhiti Street
439.	Lot 25 DP 42707	WN47D/913	58 Downes Street
440.	Lot 32 DP 17689	WN10A/1094	19 Downes Street
441.	Lot 67 DP 24876	WN46B/44	4 Moulton Street
442.	Lot 3 DP 24048	WN45C/24, WN45D/72	157 Dimock Street
443.	Part Lot 36 DP 1072, Part Lot 37 DP 1072	WN498/8, WN498/8	13B Lambley Road
444.	Lot 2 DP 27302	WNF3/816	13 Richard Street
445.	Lot 68 DP 24876	WN38A/443	2 Moulton Street
446.	Lot 2 DP 82799	WN49C/151	9B Bay Drive
447.	Lot 40 DP 7626	WN387/78	36 Whanake Street
448.	Lot 2 DP 340448	166325	9B Lambley Road
449.	Lot 22 DP 50459	WN24C/475	41 Rothwell Street
450.	Lot 2 DP 91092	WN59A/184	136A Dimock Street
451.	Lot 4 DP 50458	WN35A/983, WN36C/254, WN36C/255	30A - 30B Downes Street
452.	Lot 3 DP 6944, Lot 4 DP 6944	WN435/28, WN321/245	7 Park Avenue

453.	Lot 71 DP 7626	WN417/69	20 Thornley Street
454.	Lot 13 DP 470196	634655	28 Morere Street
455.	Lot 1 DP 517640	822872	37 Rothwell Street
456.	Lot 1 DP 382777	330740	5A Lambley Road
457.	Lot 2 DP 84994	WN53A/8	9 Lambley Road
458.	Lot 5 DP 10462	WN644/33	9 Herewini Street
459.	Lot 1 DP 480295	731269	1 John Street
460.	Lot 15 DP 42707	WN49D/870	14 Keith Hart Grove
461.	Lot 74 DP 1072	WN450/75	20 Whanake Street
462.	Lot 24 DP 24048	WN35A/563	35 Herewini Street
463.	Lot 3 DP 405104	417842	17A Richard Street
464.	Lot 18 DP 17689	WN24D/991	94 Dimock Street
465.	Lot 65 DP 18091	WN25B/704	19 Morere Street
466.	Lot 67 DP 25036	WN50A/398	87 Owhiti Street
467.	Lot 8 DP 42707	WN48C/831	19 Moulton Street
468.	Lot 46 DP 7626, Part Reserve Deposited Plan 1072	WN417/71, WN537/263	24 Whanake Street
469.	Lot 2 DP 369138	281072	25A Paenui Street
470.	Lot 40 DP 25036	WN46B/274	8 Shelley Street
471.	Lot 2 DP 40964	WN33D/440, WN33D/441, WN33D/442	14A Richard Street
472.	Lot 10 DP 24876	WNC1/1396	83 Dimock Street
473.	Lot 2 DP 386428	345971	27 Lambley Road
474.	Lot 2 DP 23352	WNA1/966	8 Main Road
475.	Lot 7 DP 470196	634649	26 Morere Street
476.	Lot 36 DP 7626	WN433/237	44 Whanake Street
477.	Lot 50 DP 7626	WN431/16	39 Thornley Street
478.	Lot 1 DP 6944	WN530/78	5 Park Avenue
479.	Lot 22 DP 7626	WN454/218	43 Whanake Street
480.	Lot 45 DP 24876	WN35D/696	128 Dimock Street
481.	Lot 1 DP 12634	WN507/34	37 Terrace Road
482.	Lot 1 DP 381484	326420	9 Jillett Street
483.	Lot 1 DP 31835	WN8C/982	23A Richard Street
484.	Part Lot 32 DP 1072, Part Lot 33 DP 1072	WN210/289, WN210/289	19 Lambley Road
485.	Lot 2 DP 422633	488515	21A Main Road
486.	Lot 32 DP 25036	WN20C/324	28 Owhiti Street
487.	Part Lot 36 DP 1072	WN268/300	25 Terrace Road
488.	Lot 3 DP 24937	WNB2/953	77 Dimock Street
489.	Lot 1 DP 463453	613379	10 Whanake Street
490.	Lot 2 DP 85205	WN53A/719	164 Dimock Street
491.	Lot 2 DP 52475	WN21C/671	30A Thornley Street
492.	Lot 27 DP 7626	WN370/136	33 Whanake Street
493.	Lot 9 DP 24048	WN51A/587	145 Dimock Street
494.	Lot 27 DP 24876	WN17B/82	18 Paenui Street
495.	Lot 1 DP 316138	63104	31 Richard Street
496.	Lot 47 DP 17689	WN47D/807	44 Downes Street
497.	Lot 1 DP 54647	WN50A/926	59B Herewini Street
498.	Lot 23 DP 10462	WN794/82	1 Kapiti Crescent
499.	Lot 7 DP 42707	WN44A/896	17 Moulton Street
500.	Lot 5 DP 556899	974500	5/1 Murphy Place
501.	Lot 39 DP 7626	WN492/173	38 Whanake Street
502.	Lot 21 DP 28831	WN36A/854	18 Jillett Street
503.	Part Lot 2 DP 17795	WNF3/412	41 Whanake Street

504.	Lot 26 DP 24048	WN11D/596	29 Herewini Street
505.	Lot 31 DP 25036	WN26B/989	30 Owhiti Street
506.	Lot 5 DP 25036	WN35D/725	82 Owhiti Street
507.	Lot 2 DP 481859	676845	41A Herewini Street
508.	Lot 54 DP 17379	WN24C/375	43 Jillett Street
509.	Lot 27 DP 17379	WN51A/112	50 Jillett Street
510.	Lot 8 DP 24048	WN45C/811	147 Dimock Street
511.	Lot 74 DP 41909	WN17C/1104	34 Rothwell Street
512.	Lot 46 DP 24876	WN30B/476	126 Dimock Street
513.	Lot 62 DP 25036	WN50A/393	146A - 146B Dimock Street
514.	Lot 1 DP 302449	9560	9A Richard Street
515.	Lot 2 DP 24048	WN7D/1468	159 Dimock Street
516.	Lot 2 DP 45551	WN16D/271	2A John Street
517.	Lot 2 DP 31835	WN8C/981	23 Richard Street
518.	Lot 24 DP 42707	WN26A/169	60 Downes Street
519.	Lot 41 DP 7626	WN470/17	34 Whanake Street
520.	Lot 4 DP 366431	269220	18A Owhiti Street
521.	Lot 28 DP 25036	WN32B/61	36 Owhiti Street
522.	Lot 1 DP 426885	506115	21 Richard Street
523.	Lot 9 DP 10462	WN24B/557	6 Bay Drive
524.	Lot 17 DP 10462	WN520/176	12 Herewini Street
525.	Lot 1 DP 23092	WNB1/504	33 Terrace Road
526.	Lot 40 DP 17379	WN40B/451	25 Jillett Street
527.	Lot 17 DP 42707	WN23C/975	10 Keith Hart Grove
528.	Lot 41 DP 25036	WN45C/462	6 Shelley Street
529.	Lot 12 DP 470196	634654	30 Morere Street
530.	Lot 51 DP 24239	WN13A/1273	35 Paenui Street
531.	Lot 2 DP 24937	WN29C/503	64 Jillett Street
532.	Lot 95 DP 1072	WN252/32	5 Thornley Street
533.	Lot 27 DP 25036	WN9C/466	38 Owhiti Street
534.	Lot 20 DP 25036	WN54C/768	52 Owhiti Street
535.	Lot 4 DP 24149	WN8A/206	13 Lambley Road
536.	Lot 2 DP 17689	WN42C/952	62 Dimock Street
537.	Lot 1 DP 41084	WN12D/1404	53B Dimock Street
538.	Lot 2 DP 404341	414950	143A Dimock Street
539.	Lot 17 DP 24937	WN31C/151	37 Morere Street
540.	Lot 6 DP 28830	WN46C/613	14 Morere Street
541.	Lot 2 DP 517640	822873	37A Rothwell Street
542.	Lot 37 DP 24876	WN23A/482	103 Dimock Street
543.	Lot 63 DP 24876	WN45C/809	9 Moulit Street
544.	Lot 5 DP 40669	WN49B/469	23 Downes Street
545.	Lot 2 DP 375134	302476	7B Lambley Road
546.	Lot 4 DP 377031	309633	115 Dimock Street
547.	Lot 43 DP 17689	WN26B/341	52 Downes Street
548.	Lot 4 DP 84160	WN51B/781	63 Dimock Street
549.	Lot 2 DP 6944	WN431/202	6 Park Avenue
550.	Lot 2 DP 27489	WN47D/893	7 Kapiti Crescent
551.	Part Lot 2 DP 23092	WN12C/922	31 Terrace Road
552.	Lot 2 DP 407528	426445	37A Whanake Street
553.	Lot 44 DP 25036	WN23A/757	22 Owhiti Street
554.	Lot 3 DP 83692	17769, 17770, 17771, 17772, 34533	4A Richard Street
555.	Lot 97 DP 1072	WNB2/1462	3 Thornley Street
556.	Lot 57 DP 7626	WN417/70	25 Thornley Street

557.	Lot 3 DP 24876	WN15B/160	57 Jillett Street
558.	Lot 1 DP 25616	WND2/935	6 Whanake Street
559.	Lot 3 DP 422196	485324	20 Jillett Street
560.	Lot 46 DP 17379	WN47D/810	3 Murphy Place
561.	Lot 21 DP 42707	WN25B/962	2 Keith Hart Grove
562.	Lot 44 DP 17379	WN46B/154	33 Jillett Street
563.	Lot 22 DP 10462	WN525/79	2 Herewini Street
564.	Lot 52 DP 7626	WN422/243	35 Thornley Street
565.	Lot 38 DP 17379	WN27A/799	21 Jillett Street
566.	Lot 49 DP 24876	WNB4/1379	120 Dimock Street
567.	Lot 68 DP 25036	WN50A/399	83 - 85 Owhiti Street
568.	Lot 44 DP 17689	WN47D/804	50 Downes Street
569.	Lot 1 DP 27302	WN6B/589	4 John Street
570.	Part Lot 1 DP 24148, Lot 3 DP 46303	WN18B/909, WN18B/909	4 Park Avenue
571.	Lot 3 DP 25036	WN16A/225	158 Dimock Street
572.	Lot 2 DP 15891	WN579/295	11A Terrace Road
573.	Lot 4 DP 24048	WN47D/301	155 Dimock Street
574.	Lot 10 DP 17689	WN12C/823	76 Dimock Street
575.	Lot 6 DP 9622	WN556/126	1 Bay Drive
576.	Lot 7 DP 10462	WN522/242	5 Herewini Street
577.	Lot 1 DP 333842	138636	4 Murphy Place
578.	Lot 2 DP 426885	506116	21A Richard Street
579.	Lot 62 DP 7626	WND1/731	36 Thornley Street
580.	Lot 21 DP 24876	238140	15 Paenui Street
581.	Lot 23 DP 17689	WN26B/842	41 Downes Street
582.	Lot 28 DP 17379	WN26B/787	52 Jillett Street
583.	Lot 2 DP 435866	533849	5A Vella Street
584.	Lot 1 DP 23728	WNA2/497	7 Terrace Road
585.	Lot 6 DP 40669	WN49B/470	21A Downes Street
586.	Lot 2 DP 373592	297057	2A Kapiti Crescent
587.	Lot 21 DP 7626	WN394/141	45 Whanake Street
588.	Lot 47 DP 25036	WN22C/517	16 Owhiti Street
589.	Lot 3 DP 9417	WN774/82	7 Bay Drive
590.	Lot 18 DP 10462	WN506/157	10 Herewini Street
591.	Lot 73 DP 24239	WN21C/533	133 Dimock Street
592.	Lot 10 DP 14845	WN54C/24	21 Kapiti Crescent
593.	Lot 28 DP 17689	WN27A/136	31 Downes Street
594.	Lot 3 DP 50458	WN25A/922	32 Downes Street
595.	Lot 7 DP 24876	WN18A/953	65 Jillett Street
596.	Lot 2 DP 417842	468745	25A Morere Street
597.	Lot 1 DP 398940	394768	25 Downes Street
598.	Lot 1 DP 91286	WN59A/728	12 Lambley Road
599.	Lot 2 DP 334340	140713	10A Lambley Road
600.	Lot 71 DP 1072	WN204/202	12 John Street
601.	Lot 14 DP 42707	WN45C/714	9 Keith Hart Grove
602.	Lot 1 DP 387504	350231	6 Richard Street
603.	Lot 38 DP 1072	WN545/176	19 Terrace Road
604.	Lot 85 DP 1072, Lot 86 DP 1072	WN493/8, WN493/8	14 Thornley Street
605.	Lot 4 DP 25036	WN40D/124	84 Owhiti Street
606.	Lot 13 DP 9622	WN516/197	7 Jillett Street
607.	Lot 49 DP 17689	WN10B/341	40 Downes Street
608.	Lot 2 DP 393164	373176	46 Downes Street
609.	Lot 55 DP 24876	WN46B/933	108 Dimock Street

610.	Lot 1 DP 405836	420418	19 Richard Street
611.	Lot 3 DP 74191	WN42A/626	39 Herewini Street
612.	Lot 1 DP 50558	WN22D/522	57B Herewini Street
613.	Lot 3 DP 25616	WNC4/529	2 Whanake Street
614.	Lot 6 DP 42707	WN49D/874	15 Moulit Street
615.	Part Lot 32 DP 1072	WN252/205	17 Lambley Road
616.	Lot 2 DP 28830	511784	6 Morere Street
617.	Lot 84 DP 25036	WN8D/375	69K Owhiti Street
618.	Lot 2 DP 394279	377169	23A Morere Street
619.	Lot 2 DP 29446	WN56A/220	12 Owhiti Street
620.	Lot 22 DP 42707	WN54C/477	14 Moulit Street
621.	Lot 3 DP 18392	WN47D/802	30 Downes Street
622.	Lot 64 DP 1072	WN254/35	5 Whanake Street
623.	Lot 33 DP 25036	WN35B/748	1 Shelley Street
624.	Lot 1 DP 570564	1031122	10 Main Road
625.	Lot 57 DP 24876	WN42C/281	104 Dimock Street
626.	Lot 53 DP 17379	WN25C/159	41 Jillett Street
627.	Lot 13 DP 10462	WN649/70	20 Herewini Street
628.	Lot 2 DP 84160	WN51B/779	67 Dimock Street
629.	Lot 18 DP 7626	WN370/42	30 Richard Street
630.	Lot 3 DP 386428	345972	29 Lambley Road
631.	Lot 2 DP 10462	WN469/175	15 Herewini Street
632.	Lot 2 DP 335913	147319	13A Main Road
633.	Lot 52 DP 17379	WN6D/466	39 Jillett Street
634.	Lot 1 DP 33991	WN16C/42	54 Herewini Street
635.	Lot 1 DP 20200	WND2/302	1 Vella Street
636.	Lot 78 DP 24239	WN28A/597	123 Dimock Street
637.	Lot 2 DP 24149	WN5B/38	27A Terrace Road
638.	Lot 23 DP 42707	WN49D/871	62 Downes Street
639.	Lot 2 DP 25616	WNC4/530	4 Whanake Street
640.	Lot 4 DP 333842	138639	6 Murphy Place
641.	Lot 2 DP 31989	WN20B/845	33B Herewini Street
642.	Lot 5 DP 26813	WN51D/795	13B Morere Street
643.	Lot 4 DP 9161	WN497/275	35 Terrace Road
644.	Part Lot 33 DP 1072	WN251/256	15 Lambley Road
645.	Part Section 110 Porirua DIST, Part Lot 1 DP 9161	WND3/1162, WND3/1162	29 Terrace Road
646.	Lot 2 DP 30670	WN9A/695	11 Paenui Street
647.	Lot 15 DP 1072	WN125/130	5 Richard Street
648.	Lot 1 DP 26550	WND3/44	15A Thornley Street
649.	Lot 40 DP 24876	WN25A/257	109 Dimock Street
650.	Lot 1 DP 335228	144327	27 Richard Street
651.	Lot 1 DP 31275	WN8A/258	34 Richard Street
652.	Lot 3 DP 333842	138638	6A Murphy Place
653.	Lot 2 DP 23728	WNA2/496	3 Terrace Road
654.	Lot 59 DP 7626	WN417/68	21 Thornley Street
655.	Lot 2 DP 422196	485323	36 Morere Street
656.	Lot 20 DP 7626	WN418/276	26 Richard Street
657.	Lot 2 DP 26813	WN51D/792	11A Morere Street
658.	Lot 42 DP 17689	WN910/52	54 Downes Street
659.	Lot 1 DP 456381	589741	3 Park Avenue
660.	Lot 1 DP 369138	281071	25 Paenui Street
661.	Lot 1 DP 386428	345970	25A Lambley Road
662.	Lot 25 DP 9417	WN502/5	11 Main Road

663.	Lot 1 DP 393972	376053	7C Richard Street
664.	Lot 10 DP 28831	WN40D/505	22 Morere Street
665.	Lot 4 DP 26813, Lot 5 DP 26813	WN51D/794, WN51D/795	13A - 13B Morere Street
666.	Lot 2 DP 304151	16666	40A Richard Street
667.	Lot 21 DP 50459	WN24C/209	39 Rothwell Street
668.	Lot 6 DP 25036	WN16D/1220	80 Owhiti Street
669.	Lot 72 DP 7626, Part Lot 73 DP 7626	WN19A/1232, WN19A/1232	31 Lambley Road
670.	Lot 66 DP 25036	WN50A/397	89 Owhiti Street
671.	Lot 1 DP 74191	WN42A/624	37A Herewini Street
672.	Lot 3 DP 8547	WN489/3	23 Lambley Road
673.	Lot 48 DP 24876	WN25A/859	122 Dimock Street
674.	Lot 2 DP 382777	330741	5 Lambley Road
675.	Lot 54 DP 24239	WN11A/60	29 Paenui Street
676.	Lot 1 DP 535151	884205	26 Thornley Street
677.	Lot 43 DP 7626	WN473/267	30 Whanake Street
678.	Lot 66 DP 24876	WN47D/925	6 Moulton Street
679.	Lot 73 DP 18091	WN8A/293	35 Morere Street
680.	Lot 1 DP 383796	334727	13 John Street
681.	Lot 111 DP 9622	WN519/286	25 Kapiti Crescent
682.	Lot 2 DP 463453	613380	10A Whanake Street
683.	Lot 6 DP 24876	WN34B/278	63 Jillett Street
684.	Lot 2 DP 48530	WN19A/71	25 Richard Street
685.	Lot 43 DP 17379	WN51A/115	31 Jillett Street
686.	Lot 2 DP 381484	326421	9A Jillett Street
687.	Lot 102 DP 18092	WN45C/765	47 Dimock Street
688.	Lot 3 DP 82799	WN49C/152	9C Bay Drive
689.	Lot 4 DP 10462	WN483/201	11 Herewini Street
690.	Lot 2 DP 91286	WN59A/729	12A Lambley Road
691.	Lot 1 DP 3737	WN246/272	21 Bay Drive
692.	Lot 9 DP 42707	WN25A/447	21 Moulton Street
693.	Lot 13 DP 25036	WN39B/922	66 Owhiti Street
694.	Lot 2 DP 26813, Lot 3 DP 26813	WN51D/792, WN51D/793	11A - 11B Morere Street
695.	Section 4 SO 446704	702653	Thornley Street
696.	Lot 3 DP 17689	WND1/1453	64 Dimock Street
697.	Lot 14 DP 24876	WN49B/504	97 Dimock Street
698.	Lot 92 DP 1072	WN118/110	8 Thornley Street
699.	Lot 103 DP 9622	WN530/274	11 Kapiti Crescent
700.	Lot 1 DP 52475	WN21C/670	30 Thornley Street
701.	Lot 75 DP 24239	WN35B/671	129 Dimock Street
702.	Lot 4 DP 18392	WN47D/803	28 Downes Street
703.	Lot 61 DP 24239	WN27D/526	26 Paenui Street
704.	Lot 1 DP 351266	210040	44 Owhiti Street
705.	Lot 50 DP 24876	WN21B/223	118 Dimock Street
706.	Lot 9 DP 28831	WN36A/848	20 Morere Street
707.	Lot 1 DP 20182	WN21D/278	15 Downes Street
708.	Lot 1 DP 340448	166324	9A Lambley Road
709.	Lot 73 DP 41909	WN17A/1007	36 Rothwell Street
710.	Lot 30 DP 24876	WN37B/280	12 Paenui Street
711.	Lot 15 DP 25036	WN50A/379	62 Owhiti Street
712.	Lot 99 DP 9622	WN6D/352	3 Kapiti Crescent
713.	Lot 69 DP 7626	WN519/73	24 Thornley Street
714.	Lot 6 DP 470196	634648	26A Morere Street

715.	Lot 21 DP 10462	WN542/214	4 Herewini Street
716.	Lot 22 DP 17379	WN25B/410	36 Jillett Street
717.	Lot 103 DP 18092	WN47D/627	49 Dimock Street
718.	Lot 42 DP 24048	WN12C/57	36 Herewini Street
719.	Lot 57 DP 17379	WN26D/917	3 Morere Street
720.	Lot 60 DP 25036	WN49B/487	142A - 142B Dimock Street
721.	Lot 17 DP 24048	WN14B/127	51 Herewini Street
722.	Lot 51 DP 24876	WN46B/929	116 Dimock Street
723.	Lot 4 DP 393972	376056	7 Richard Street
724.	Lot 18 DP 17140	WN15C/1190	14 Kapiti Crescent
725.	Lot 3 DP 393972	376055	7A Richard Street
726.	Lot 21 DP 1072	WN188/153	11 Richard Street
727.	Lot 1 DP 550202	947710	45 Herewini Street
728.	Lot 28 DP 9417	WN432/187	5 Main Road
729.	Lot 35 DP 7626	WN525/137	46 Whanake Street
730.	Lot 8 DP 24876	WN20C/1441	79 Dimock Street
731.	Lot 3 DP 28830	WN36A/845	8 Morere Street
732.	Lot 2 DP 424232	494188	74A Owhiti Street
733.	Lot 2 DP 30880	WN7C/928	15B Jillett Street
734.	Lot 45 DP 17379	WN51A/116	35 Jillett Street
735.	Lot 7 DP 25036	WN26A/693	78 Owhiti Street
736.	Lot 1 DP 31989	WN24C/944	33A Herewini Street
737.	Lot 47 DP 24876	WN7B/1418	124 Dimock Street
738.	Lot 1 DP 394279	377168	23 Morere Street
739.	Lot 4 DP 17689	WN50A/499	66 Dimock Street
740.	Lot 11 DP 7626	WN490/68	44 Richard Street
741.	Lot 56 DP 7626	WN394/25	27 Thornley Street
742.	Lot 2 DP 366431	269221	18 Owhiti Street
743.	Lot 1 DP 7626, Lot 1 DP 47350	WN19A/1231, WN19A/1231	30 Lambley Road
744.	Lot 15 DP 7626	WN544/275	36 Richard Street
745.	Lot 60 DP 24239	WN21C/754	24 Paenui Street
746.	Lot 26 DP 9417	WN608/276	9 Main Road
747.	Lot 4 DP 40669	WN49B/468	21 Downes Street
748.	Lot 1 DP 25036	WN13C/955	162 Dimock Street
749.	Lot 1 DP 323300	93511	37 Thornley Street
750.	Lot 3 DP 29446	WN29B/616	10 Owhiti Street
751.	Lot 1 DP 86710	WN54B/279	63 Herewini Street
752.	Lot 1 DP 48530	WN19A/70	25A Richard Street
753.	Lot 24 DP 24876	WN25B/769	21 Paenui Street
754.	Lot 2 DP 24876	WN45C/808	55 Jillett Street
755.	Lot 1 DP 334894	142956	20 Richard Street
756.	Lot 14 DP 9622	WNF4/533	5A Jillett Street
757.	Lot 5 DP 9622	WN551/293	3 Bay Drive
758.	Lot 19 DP 7626	WN415/292	28 Richard Street
759.	Lot 3 DP 375134	302477	7A Lambley Road
760.	Lot 1 DP 377031	309630	117 Dimock Street
761.	Lot 50 DP 17689	WN47D/808	38 Downes Street
762.	Lot 1 DP 24876	WNB4/1376	53 Jillett Street
763.	Lot 2 DP 555774	968794	4A Kapiti Crescent
764.	Lot 26 DP 42707, Lot 27 DP 42707	,	1 Keith Hart Grove
765.	Lot 2 DP 398940	394769	25A Downes Street
766.	Lot 66 DP 18091	WN16D/836	21 Morere Street
767.	Lot 94 DP 1072	WN264/295	6 Thornley Street

768.	Lot 62 DP 24239	WN42C/276	28 Paenui Street
769.	Lot 2 DP 21570	WN888/87	10 Bay Drive
770.	Lot 28 DP 24876	WN36B/787	16 Paenui Street
771.	Lot 2 DP 318960	74245	19A Main Road
772.	Lot 1 DP 345251	185452	17 Terrace Road
773.	Lot 37 DP 24048	WN11A/1228	28 Herewini Street
774.	Lot 72 DP 41909	WN26A/129	145 Gloaming Hill
775.	Lot 13 DP 17689	WN51D/788	84 Dimock Street
776.	Lot 3 DP 24824	WNB3/1403	26 Whanake Street
777.	Lot 2 DP 535151	884206	26A Thornley Street
778.	Lot 12 DP 7626	WN447/191	42 Richard Street
779.	Lot 3 DP 393164	373177	48A Downes Street
780.	Lot 2 DP 493339	719273	22 John Street
781.	Lot 20 DP 42707	WN47D/914	4 Keith Hart Grove
782.	Lot 18 DP 24876	WN46C/774	9 Paenui Street
783.	Lot 18 DP 24048	WN51A/591	49 Herewini Street
784.	Lot 48 DP 17689	WN7B/549	42 Downes Street
785.	Lot 35 DP 24876	WN44A/887	99 Dimock Street
786.	Lot 19 DP 10462	WN522/240	8 Herewini Street
787.	Lot 64 DP 18091	WN47D/628	17 Morere Street
788.	Lot 1 DP 318960	74244	19 Main Road

Appendix D. Section 32AA Evaluation

E1. Overview and purpose

This evaluation is undertaken in accordance with section 32AA of the RMA. It examines the appropriateness of the recommended amendments to the policies and rules for the radiocommunication transmission topic following the consideration of submissions received on the PDP. The recommended radiocommunication transmission topic provisions are contained in the INF – Infrastructure, MRZ – Medium Density Residential Zone and LCZ – Local Centre Zone chapters. Amendments to the planning maps are also recommended.

This further evaluation should be read in conjunction with Part A – Overview and Part B Infrastructure, Residential Zones and Commercial Zones of the Section 32 Report prepared for the development of the PDP.

E2. Recommended amendments

The recommended amendments consist of one new policy in the INF – Infrastructure chapter, a new rule in each of the MRZ – Medium Density Residential Zone and LCZ – Local Centre Zone chapters, amendment of TEMP-R1, and associated amendments to the planning maps.

The intention of the proposed amendments is not to preclude development occurring, but to ensure that any risks associated with the electromagnetic radiation generated by the RNZ transmission mast are recognised and mitigated if required.

Amendments to the planning maps identify the geographic location where the provisions apply, identified as the Radio Transmission Height Control Area (RTHCA). The RTHCA is defined by the 1,057-metre radius from the RNZ transmission mast. The area is divided into two sub-areas, Areas A and B. Area A is defined by the 528-metre radius from the transmission mast. Area B covers the extent between the 528-metre radius and the 1,057-metre radius.

The rules recommended for inclusion in the MRZ – Medium Density Residential Zone and LCZ – Local Centre Zone chapters are the same. They are entitled 'Buildings and structures within the Radio Transmission Height Control Area'. They enable buildings and structures up to 10-metres in height as a permitted activity. Any buildings and structures greater than 10-metres in height within RTHC Area B requires consent as a controlled activity, with a section 88 requirement requiring provision of an assessment of the effects of electromagnetic radiation generated by RNZ's transmission site on the safety of workers or occupants of the proposed buildings and structures. Any buildings and structures greater than 10-metres in height within RTHC Area A requires consent as a restricted discretionary activity, with public notification precluded and specific consideration given to RNZ in relation to consideration of affected parties. The matters of control and discretion refer to the proposed new policy in the INF – Infrastructure chapter.

The recommended amendments to TEMP-R1 reflect the new rules in the two zone chapters but apply specifically to temporary buildings and structures ancillary to a construction activity. These are intended to capture temporary construction structures above 10 metres in height that may be affected by electromagnetic radiation such as scaffolding and cranes.

The recommended policy in the INF – Infrastructure chapter, also entitled 'Buildings and structures within the Radio Transmission Height Control Area', sets out a list of matters to be considered when assessing any buildings and structures proposed within the RTHCA, including, among other matters,

reverse sensitivity effects, safety risks associated with electromagnetic hazards, and consultation with Radio New Zealand.

E3. Statutory Tests

The Council must ensure that prior to adopting an objective, policy, rule or other method in a district plan, that the proposed provisions meet the requirements of the RMA through an evaluation of matters outlined in Section 32.

In achieving the purpose of the RMA, the Council must carry out a further evaluation under section 32AA if changes are made to a proposal as a result of the submissions and hearings process. This evaluation must cover all the matters in sections 32(1)-(4).

Objectives

The objectives are to be examined in relation to the extent to which they are the most appropriate way to achieve the purpose of the RMA.⁴¹ For the purposes of evaluation under section 32AA the following criteria form the basis for assessing the appropriateness of the proposed objectives:

- Relevance;
- Usefulness;
- Reasonableness; and
- Achievability.

Provisions

Each provision is to be examined as to whether it is the most appropriate method for achieving the objectives. For a proposed plan, the provisions are defined as the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan.⁴²

The examination must include assessing the efficiency and effectiveness (including costs and benefits of the environmental, economic, social, and cultural effects, quantified if practicable, and the risk of acting or not acting) and a summary of the reasons for deciding the provisions.

E4. Objectives

No objectives are recommended to be amended. The relevant objectives are:

INF-01 The benefits of Regionally Significant Infrastructure

The national, regional and local benefits of Regionally Significant Infrastructure are recognised and provided for.

INF-02 The protection of Regionally Significant Infrastructure

The function and operation of Regionally Significant Infrastructure is protected from the adverse effects, including reverse sensitivity effects, of subdivision, use and development.

RESZ-03 Sustainable, healthy and safe residential zones

The intensity, form and design of use and development in Residential Zones achieves the efficient and sustainable use of residential land and infrastructure and a healthy and safe

⁴¹ RMA s32(1)(a)

⁴² RMS s32(6)(a)

built environment, which is consistent with the planned urban built environment for the zone or precinct.

The recommended policy, rules and amendment to the planning maps are therefore assessed against these objectives.

E5. Evaluation of Policy and Rules

I have assessed how the recommended changes to the policies, rules and other methods are the most appropriate to implement the objectives below. In undertaking this assessment, I have evaluated the recommended amendments against the provisions as notified.

Efficiency and Effectiveness of the Provisions

I have assessed the efficiency and effectiveness of the recommended amended provisions in achieving the objectives, including identification and assessment of the costs and benefits anticipated from the implementation of the provisions in Table E 1 below.

Additionally, I have also assessed the amendments to the PDP provisions sought by RNZ and an alternative option in Table E 2 below.

Table E 1: Assessment of efficiency and effectiveness of recommended provisions

Recommended Amendments to Provisions:	
<p>The recommended amendments are described in E2 above and set out in full in Appendix A. In summary these are:</p> <ul style="list-style-type: none"> • Identification on the planning maps of the 528 metre and 1,057 metre radii, described as the Radio Transmission Height Control Area A and B; • A new policy in the INF – Infrastructure chapter setting out matters to be considered for buildings and structures over 10-metres in height; and • New rules in the MRZ, NCZ and an amendment to TEMP-R1 for buildings and structures in the Radio Transmission Height Control Area. 	
Costs	Benefits
<p><i>Environmental</i> As the provisions relate only to the permitted height of buildings, there are no identified direct or indirect environmental costs.</p> <p><i>Economic</i> Direct costs would include consenting costs where applicants seek to construct a building or structure that exceeds 10m in height. These costs include those associated with procuring any expert advice required as well as the cost of consent processing.</p> <p>The recommended amendments do not have any corresponding provisions in the ODP, and therefore any opportunity costs associated with these provisions are new. The affected area of the MRZ and LCZ covers approximately 76.58ha and includes approximately 788 allotments. The</p>	<p><i>Environmental</i> As the provisions relate only to the permitted height of buildings, there are no identified direct environmental benefits.</p> <p><i>Economic</i> The recommended amendments will result in and buildings and structures greater than 10m in height within the specified area requiring consent as at least a controlled activity. This will ensure that the potential adverse effects of these activities can be assessed and appropriately managed prior to construction taking place. This will have economic benefits for RNZ and developers of sites within the height control area through being aware at an earlier stage of the potential risks of buildings and structures greater than 10 metres, therefore avoiding costly and time consuming ad hoc</p>

<p>rules restrict the height of buildings and structures within this area. Buildings and structures exceeding 10m in height require consent as a controlled activity within Area B and restricted discretionary activity within Area A.</p> <p>As such, while there would be a cost associated with this process, it is not considered to be a significant cost as there is a clear consenting pathway available for appropriate activities.</p> <p>There will also be minor short-term costs to plan users and Council consenting teams as they build familiarity with the new provisions. This is likely to be minor as the provisions are similar to those already used in the PDP for the Gas Transmission Pipeline Corridor and the National Grid Yard.</p> <p>Economic costs will also relate to the reduced development potential of the affected sites, particularly in Area A, due to the reduced height limit when compared to the status quo. The indirect economic cost of this would result from the reduced certainty for applicants, with it being expected that fewer projects for residential intensification being initiated and therefore fewer total residential units being constructed within the area in the long term. However, it is noted that the controlled activity status for Area B means that consents cannot be declined, and therefore the actual effect on the development potential is limited. Similarly, while inappropriate development can be declined consent within Area A due to the restricted discretionary activity status, this is still a relatively enabling status and the recommended policy clearly sets out the relevant matters for consideration. This will assist in limiting the economic costs on development potential through the clear consenting pathway, as noted above.</p> <p>As such, the actual economic costs associated with the recommended amendments are considered likely to be relatively low.</p> <p><i>Social</i> Indirect social costs may include a reduction in the potential for or intensity of socially</p>	<p>management of the risks by RNZ, and effects and the associated potential costly delays or other issues for developers during or after construction.</p> <p>The limitation of building height within the specified area will assist in avoiding reverse sensitivity effects which may result in RNZ having to remove the existing radio transmission infrastructure and establish a new site, which is estimated to potentially cost \$5 million or more.</p> <p>The recommended amendments have economic benefits over those sought by RNZ as they implement a controlled activity status for the area between the 528m and 1,057m radii (identified as Area B). This area makes up approximately 76.5 percent of the total area of MRZ and LCZ within the 1,075m radius. The controlled activity status provides greater clarity and certainty for plan users and has lower administrative costs for applicants and the Council.</p> <p><i>Social</i> The direct social benefits include enabling people and communities to provide for their social wellbeing and their health and safety, consistent with the purpose of the RMA, through ensuring that any structures and buildings will be designed and constructed to avoid potential adverse effects on health and safety of occupants and workers from their proximity to the RNZ transmission mast. As identified by RNZ, buildings and structures greater than 10m within the specified distance from the mast may result in adverse safety effects through EMR coupling, as well as potential for reverse sensitivity effects. The recommended amendments will ensure that those risks are appropriately recognised and mitigated.</p> <p>Social benefits also include those related to the continued operation of the transmission facilities. RNZ is listed as a specific entity in Part A of Schedule 1 of the Civil Defence Emergency Management Act 2002 and is therefore a 'lifeline utility'. The RNZ radio transmission site facilities therefore provide important civil defence functions. The recommended</p>
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<p>beneficial development within the identified areas, including the provision of additional housing through residential intensification.</p> <p>Indirect social costs may be associated with the resource consent processes for development and the associated resource, time and financial costs.</p> <p><i>Cultural</i> As the provisions relate only to the permitted height of buildings, there are no identified direct cultural costs.</p>	<p>amendments will assist in ensuring that reverse sensitivity and safety effects are appropriately managed, and therefore that the transmission facilities are not compromised.</p> <p><i>Cultural</i> There are no identified direct cultural benefits. The indirect cultural benefits are largely associated with the wider social benefits of the continued unconstrained operation of the radio transmission facilities.</p>
Efficiency	<p>The recommended provisions are considered to be a highly efficient means of achieving the objectives given the above assessment of costs and benefits. The potential environmental, social, economic and cultural costs associated with the proposed provisions are considered to be relatively low overall, acknowledging that there will be some economic costs to affected landowners associated with the Radio Transmission Height Control Area. However, the potential benefits of the recommended amendments, particularly economic and social benefits, are considered to be relatively high, due to the regionally significant nature of infrastructure and the social and economic wellbeing benefits early awareness of the potential issues provides.</p>
Effectiveness	<p>The proposed provisions are considered to be a highly effective means of meeting the objectives as they will provide increased social, economic and cultural benefits as outlined above. Including clear policy guidance for the consideration of buildings and structures above 10-metres in height will provide effective guidance to decision makers.</p> <p>Similar provisions for the protection of Regionally Significant Infrastructure from adjacent activities have proved to be effective in relation the protection of the National Grid in the ODP. As such the recommended provisions are also expected to be effective.</p> <p>The recommended amendments are considered to give effect to the objectives of the PDP and the objectives and policies of the RPS relating to regionally significant infrastructure.</p>
Summary	
<p>It is considered that the recommended amendments will be more efficient and effective than the PDP as amended through Variation 1, and the amendments sought by RNZ, in giving effect to the relevant PDP objectives and the relevant higher order documents, and are consistent with the purpose of the RMA. As such, they are the preferred option.</p>	

Table E 2: Assessment of efficiency and effectiveness of RNZ amendments sought

Recommended Amendments to Provisions:
<p>The amendments sought by RNZ included, in summary:</p> <ul style="list-style-type: none"> • Insert a list of 'qualifying matters' in the Proposed Variation; • New qualifying matter for 'Radiocommunication Transmission';

- Additional text in the RESZ chapter to recognise that additional controls are necessary to mitigate the adverse effects resulting from taller buildings in close proximity to RNZ's transmission infrastructure;
- A new policy in the RESZ chapter for 'Height Control – Radiocommunication Transmission';
- A new clause in MRZ-S2 limiting height to 10 metres on sites subject to Height Control – Radiocommunication Transmission; and
- Amending the planning maps to identify sites subject to the radiocommunication transmission qualifying matter using the 1,027-metre radius.

Costs	Benefits
<p><i>Environmental</i> As the provisions relate only to the permitted height of buildings, there are no identified direct or indirect environmental costs.</p> <p><i>Economic</i> As the RNZ amendments only refer to MRZ-S2 in relation to the height limit of 10m, development within the two small areas of NCZ would not be captured. Additionally, while RNZ's reasoning includes temporary structures like cranes, these are not managed under the zone chapters but under the TEMP – Temporary activities chapter. As such, the RNZ amendments would not result in management of these structures, and therefore would not realise the benefits from management of those activities.</p> <p>The RNZ amendments would result in all buildings and structures (other than those managed under the TEMP – Temporary Activities chapter) within 1,057m of the transmission mast with a height greater than 10m being a restricted discretionary activity. As such, these provisions provide less certainty for most applicants than the recommended amendments, which sets a controlled activity status for the same activity across more than three-quarters of the area. It would have greater administrative costs for applicants and Council.</p> <p>The indirect economic cost would result from the reduced certainty for applicants when compared to the recommended amendments, with it being expected that fewer projects for residential intensification being initiated and therefore fewer total residential units being constructed in the long term. However, it is recognised that restricted discretionary is still considered to be a relatively enabling activity status.</p>	<p><i>Environmental</i> As the provisions relate only to the permitted height of buildings, there are no identified direct or indirect environmental benefits.</p> <p><i>Economic</i> The RNZ amendments would provide most of the same economic benefits as described above in relation to the recommended amendments through management of the height of buildings and structures greater than 10m in height, although this would be limited to permanent structures within the MRZ.</p> <p><i>Social</i> The RNZ amendments would provide most of the same social benefits as described above in relation to the recommended amendments through management of the height of buildings and structures greater than 10m in height, although this would be limited to permanent structures within the MRZ.</p> <p><i>Cultural</i> There are no identified direct cultural benefits. The indirect cultural benefits are largely associated with the wider social benefits of the continued unconstrained operation of the radio transmission facilities.</p>

<p><i>Social</i></p> <p>The direct social costs as compared to the recommended amendments would be associated with the lack of direct management of temporary buildings and structures associated with construction activity. This would mean that activities with potential health and safety risks would not be captured by the RNZ amendments, whereas these are captured by the recommended amendments.</p> <p>The indirect social costs would be associated with the reduced certainty for applicants as compared to the recommended amendments, and the associated likely reduction in total residential units constructed in the long-term with the associated social cost of a more limited residential supply.</p> <p><i>Cultural</i></p> <p>As the provisions relate only to the permitted height of buildings, there are no identified direct or indirect cultural costs.</p>	
Efficiency	The RNZ amendments would be relatively efficient, as the majority of the social and economic benefits of the management of the effects would be realised, while imposing relatively low costs. However, the RNZ amendments would be less efficient than the recommended amendments, due to higher consenting and administrative costs.
Effectiveness	The RNZ amendments would be relatively effective in achieving the objectives. However, the effectiveness would not be as great as the recommended amendments due to the height limit only relating to buildings and structure managed under the MRZ chapter and therefore not managing buildings and structures in the LCZ zone or temporary structure associated with construction activities.
Summary	
It is considered that the RNZ amendments, while having economic and social benefits that would likely outweigh the costs, are less efficient and effective than the recommended amendments.	

Table E 3: Assessment of efficiency and effectiveness of the status quo

Recommended Amendments to Provisions:	
Maintain the PDP provisions as amended by Variation 1.	
Costs	Benefits
<p><i>Environmental</i></p> <p>As the provisions relate only to the permitted height of buildings, there are no identified direct or indirect environmental costs.</p>	<p><i>Environmental</i></p> <p>As the provisions relate only to the permitted height of buildings, there are no identified direct or indirect environmental benefits.</p>
<i>Economic</i>	<i>Economic</i>

<p>Maintaining the status quo would require RNZ to continue to try to engage with developers on an ad hoc basis to manage the potential health and safety risks of development within the specified area, which would require additional resourcing. This is less efficient than Council involvement, as the Council is already likely to have knowledge of those developments through building consent and other resource consenting processes.</p> <p>In a worst-case scenario, RNZ estimate that the cost to remove existing infrastructure at Porirua and to establish a new site could be \$5 million or more.</p> <p><i>Social</i> There may be direct adverse effects on the health, safety and wellbeing of occupants in and workers on buildings and structures greater than 10m in height within the specified areas. This may result in significant social costs.</p> <p>Indirect social costs may result from long-term impacts on the ongoing operation of the radio transmission site and the associated social benefits accrued from that operation including in relation to its lifeline utility functions.</p> <p><i>Cultural</i> As the provisions relate only to the permitted height of buildings, there are no identified direct cultural costs.</p>	<p>The PDP provisions as amended by Variation 1 enable greater development potential of sites through higher permitted building heights. This has direct economic benefits through maximising the efficient use of sites by owners. It also has wider economic benefits through the efficient use of existing urban areas, including infrastructure and amenities.</p> <p>The status quo would result in fewer resource consents required by developers for any proposed intensification, with associated lower financial and administrative costs, including for the Council.</p> <p>However, compared to the recommended provisions, the recommended controlled activity status applying to more than three-quarters of the affected area would minimise these benefits.</p> <p><i>Social</i> The social benefits would be associated with the reduced compliance and administrative costs, and the likely higher number of residential units constructed within the urban area as a result. However, compared to the recommended provisions, the recommended controlled activity status applying to more than three-quarters of the affected area would minimise these benefits.</p> <p><i>Cultural</i> As the provisions relate only to the permitted height of buildings, there are no identified direct cultural costs.</p>
Efficiency	It is considered that the status quo is not the most efficient, as it may result in significant economic and social costs, while the benefits would likely be relatively modest compared to the recommended amendments.
Effectiveness	The status quo would not be effective in giving effect to the relevant PDP objectives or RPS provisions, or the purpose of the RMA as it would not protect the regionally significant infrastructure, or enable people and communities to provide for their health and safety.
Summary	
It is considered that the status quo, is less efficient and effective than the recommended amendments, as it would likely have costs that would outweigh the benefits and would not give effect to the PDP objectives, RPS objectives and policies, or the purpose of the RMA.	

Overall, taking into account the assessment above, I consider the recommended amendments to the policies and rules to be more efficient and effective in achieving the objectives than the notified provisions, and the amendments sought by RNZ.

Adequacy of Information and Risk of Acting or Not Acting

Section 32(2)(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

RNZ's submission has raised a matter in relation to the potential for health and safety and reverse sensitivity effects from the radio transmission mast at Whitireia Park. I consider that this matter needs to be addressed to ensure that the PDP gives effect to the relevant objectives and policies of the RPS relating to the protection of regionally significant infrastructure and is consistent with the purpose of the RMA. RNZ identified that if no action is taken and the PDP is retained as notified, it could result in health and safety risk to workers and the public.

The risk of not acting is therefore that the PDP provisions do not effectively or efficiently achieve the relevant objectives and may result in adverse effects on the safety of workers and public. As identified by RNZ, there are risks associated with buildings and structure greater than 10 metres in height:

- Within 528 metres from the transmission mast, structures greater than 10 metres will mostly likely result in EMR levels exceeding public limits; and
- Between 528 metres and 1057 metres from the mast, structures greater than 10 metres may result in EMR levels exceeding public limits.

The health and safety effects are identified as including shocks or burns from contact with large metallic objects, including temporary structures like cranes. Additionally, 'nuisance' issues may cause reverse sensitivity issues.

I have considered whether there is sufficient information to justify the recommended amendments. I have considered and relied upon the information provided by RNZ in undertaking my assessment. Given the potential risks of not acting, and the highly technical nature of the matters raised by RNZ, which is a Crown entity established under the Radio New Zealand Act 1995, and the specialist technical expertise held by that organisation, I consider that in the circumstances there is sufficient evidence to justify the recommended amendments.

On this, I note that the planning response in the recommended provisions apply a controlled activity status to more than three-quarters of the affected land area, with a restricted discretionary activity applying to the area closest to the radio transmission mast. I consider that this is an appropriate and proportional response to the identified risk and the available evidence.

Consequently, after reviewing the provisions of the PDP relating to height near the RNZ transmission mast site, and considering the submissions on these provisions, I consider there is sufficient information on which to base the recommended revised policy and rules and amendments to the planning maps. The recommended amendments address the matters raised and assist in making the provisions efficient and effective in achieving the objectives.

E6. Conclusion

I have evaluated the recommended amendments to the proposed provisions, including their efficiency and effectiveness in achieving the proposed objectives. I consider the proposed policy and amendments to rules as recommended are the most appropriate means of achieving the objectives.

Appendix E. Estimated Development Capacity Loss from RNZ

It is assumed that the qualifying matter sought by RNZ would effectively reduce the development capacity within the affected area so that it reflected that under the PDP as notified in 2020.

The report 'Porirua Feasible Capacity Assessment' (Property Economics, 2021) stated that based on the PDP zoning, the theoretical capacity in Titahi Bay was 14,380 in residential zones, and 526 in the centre zones. This equates to 96.5 percent and 3.5 percent respectively. Given the small area of NCZ in the affected area, it is assumed that the residential capacity within Titahi Bay is essentially all provided within the MUZ, which is located outside of the affected area.

Development Capacity of Affected area under PDP 2020

The total theoretical capacity stated in Table 1 of 'Variation 1 and Change 19 Qualifying Matters Assessment' (Property Economics, 2022) stated for Titahi Bay the theoretical capacity of 12,090 as a net yield. Applying the apportionment between residential and centre zones noted above from the 2021 report, the total for the residential zones in Titahi Bay would be approximately 11,667.

Under the PDP, the total area of GRZ and MRZ in Titahi Bay is approximately 266 hectares. The area of GRZ and MRZ covered by the 1,057-metre radius is approximately 76.3 hectares. The area of the 1,057 metre radius is therefore approximately 28.7 percent of the area of MRZ in Titahi Bay.

From the 11,667 figure assumed above, and assuming an approximately equal proportion of GRZ and MRZ within the 1,057 metre radius from the transmission mast as in the wider Titahi Bay area, the theoretical capacity the 1,057 metre radius area could be assumed to be approximately 3,351. The realisable capacity in Titahi Bay is stated in the 2021 report as 1,418. Applying the same assumptions, the realisable capacity in the 1,057 metre radius area would be approximately 393.

However, the proportion of MRZ in the 1,057 metre radius area is approximately 6.5 percent versus approximately 16.9 percent for the wider Titahi Bay area and therefore these are likely to be slightly over-estimated.

Development Capacity of Affected Area under PDP with Variation 1

The wider Titahi Bay area is identified in the 'Variation 1 and Change 19 Qualifying Matters Assessment' (Property Economics, 2022) as providing roughly 10 percent of the total theoretical capacity (net yield) within Porirua, at 22,250 of the 224,767 total. This was a 10,160 increase on the PDP 2020 theoretical capacity for Titahi Bay.

In 'Variation 1 and Change 19 Qualifying Matters Assessment', Table 3 shows that of the realisable capacity within Porirua, approximately 11.3 percent is in the commercial zones, 29 percent is in the residential zones, and 59.8 percent is in the intensification areas (HRZ and RIP).

There is no HRZ in the residential area of Titahi Bay. The proportion of the RIP in the residential area of Titahi Bay in terms of land area at approximately 36.2 percent is similar to the proportion of 'intensification areas' (RIP and HRZ) across the entirety of the residential zones of the City as a whole, at 31.4 percent.

However, the proportion of commercial zones within Titahi Bay of the total commercial and residential zones is about 1.1 percent by land area, as opposed to about 6.9 percent for across Porirua. As such, the development capacity provided by the commercial zones within Titahi Bay is

assumed to be approximately 3.5 percent as indicated by the 2021 report. Again, it is assumed that this is predominantly provided by the MUZ.

Using the proportions noted above for the whole of Porirua, 3.5 percent of the theoretical capacity for Titahi Bay of 22,250 is first apportioned to the commercial zones, and the remaining (21,471) is apportioned to the intensification areas and other residential areas by a ratio of about two-to-one, resulting in figures of approximately 14,456 and 7,012 respectively.

Using the relative land area of the RIP and MRZ within Titahi Bay compared to the 1,057 metre radius, the theoretical capacity within the 1,057 metre radius area would be 1,709 within the RIP, and 2,686 in the MRZ. The total theoretical capacity would therefore be approximately 4,395.

As a validity check, the numbers above for the area within the 1,057 radius result in residential capacity per hectare of approximately 41.4 for the MRZ and 150.3 for the RIP. Across the city, based on the 2022 report, the corresponding figures are approximately 29.5 and 132.6. The estimated theoretical capacity for the 1,057 metre radius area is therefore somewhat higher, but roughly comparable. As such, it is assumed that the total loss estimate will be somewhat over-estimated.

The 2022 report then calculates the effect of the qualifying matters on the theoretical capacity. This results in a reduction of around 3.5 percent for the MRZ and 7.4 percent for the RIP. Applying this to the 1,057 metre radius area results in a revised theoretical capacity of approximately 4,179 (1,582 in the RIP and 2,596 in the MRZ).

Applying the overall percentage of 23 percent for the residential and 10 percent for the RIP of the theoretical capacity to get the realisable capacity, gives a total realisable capacity within the 1,057 radius area of approximately 755.

Assumed Capacity Loss

Based on the above assumptions, the total loss of theoretical capacity within the 1,057 metre radius area is approximately 828, while the loss of realisable capacity is approximately 362.

Appendix F. 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.