

**Before the Panel Convener appointed under the
Fast-track Approvals Act 2024**

Under the Fast-track Approvals Act 2024

In the matter of Mt Welcome, Pukerua Bay

By Pukerua Property Group Limited Partnership

Response to Panel Minute 4

17 July 2026

INFORMATION REQUEST

- 1 This memorandum responds to directions from the Panel in Minute 4 (dated 6 July 2026) to provide further information regarding roundabout construction in relation to the Taupō Stream.
- 2 The Panel seeks to understand what options the applicant considered with regard to stream works associated with the roundabout, and what potential alternatives are available.
- 3 The Panel provided an alternative concept for the applicant to consider which the Panel consider may eliminate the need for a culvert.

DISCUSSION

Options considered

- 4 In paragraph 6, the Panel requests that the applicant advise “if it has previously considered some form of stream realignment and, if so, what its reasons were for preferring the proposed culverting option”.
- 5 The applicant did consider stream realignment as an alternative to culverting. However this option was discounted based on advice from the project ecologist (summarised in their memorandum attached as **Appendix A**).
- 6 The project ecologist is of the view that the stream is of low ecological value. For example, it has a poor macroinvertebrate community, there are no fish, and the stream is near its headwaters. Conversely, a realignment of the stream to facilitate the roundabout would require removal of a significant amount of broadleaf forest from within a Significant Natural Area (SNA027). The extensive cuts back into the hill slope would result in non-natural land forms that will require substantive

rehabilitation and result in a residual adverse effect post rehabilitation of the cut area. Ultimately, the ecologist considered that the ecological value preserved by realigning the stream is not worth the created damage and rehabilitation requirements to SNA027.

- 7 On the basis of the project ecologist's opinion, the culverting option was ultimately preferred to the stream realignment to accommodate the roundabout.
- 8 The applicant previously also considered different locations for the intersection, as well as a different form of intersection which would avoid the need to reclaim or realign the stream. This included locations further to the south. These locations were discounted primarily on topographical/engineering grounds as the grade of the road relative to the Mt Welcome site drops significantly to the south of the proposed roundabout location. The Infrastructure Report considered¹:

The proposed location aligns with the Northern Growth Area Structure Plan.

Relocating east would move SH59 through-lanes outside the legal NZTA corridor.

Due to the existing topography, this shift would require additional earthworks and result in greater stream impacts on the eastern side of the highway. It would also create issues with horizontal and vertical geometry relative to the existing highway alignment. The current location represents the easternmost alignment within NZTA design tolerances.

¹ Refer page 24 of the Infrastructure Report (Appendix 9 to the Substantive Application).

- 9 The applicant considered other forms of intersection that would have smaller footprint, such as an upgraded priority tee-intersection or a signalised intersection².
- 10 These options would have much smaller footprints in terms of vegetation clearance and earthworks, and therefore much lower ecological and cultural effects. Both options would be less expensive for the applicant to construct. A signalised intersection also has benefits from a connectivity perspective as it would allow an at-grade pedestrian/cycle crossing which could be connected to the Ara Harakeke shared pathway in the future.
- 11 However, NZTA do not consider that signals are appropriate from a safety perspective under the current high-speed conditions³.
- 12 The applicant raised the possibility with NZTA of reducing the speed environment to allow a signalised intersection⁴. This option was supported by both Te Rūnanga o Toa Rangatira (Ngāti Toa) and Porirua City Council. A specific workshop on this option was hosted by Ngāti Toa on 17 December 2025 where the various positions of the parties were discussed⁵. NZTA outlined how speed is dictated by the form and function of the road, and noted that strategic planning was underway across the regional network including the future form and function of the SH59 corridor.

² Refer page 30 of the Integrated Transport Assessment (Appendix 14 to the Substantive Application).

³ Refer page 30 of the Integrated Transport Assessment (Appendix 14 to the Substantive Application).

⁴ Refer page 31 of Appendix 2 of the Substantive Application, including the 9 October 2025 minutes on page 102.

⁵ See page 37 of Appendix 2 of the Substantive Application, including the 17 December 2025 minutes on page 304.

- 13 A signalised option remains the applicant's preferred option should NZTA accept a signalised intersection in the future in advance of the roundabout needing to be constructed.

Alternative concept

- 14 The Panel has proposed an alternative option to construct a realigned section of stream to the west of the proposed roundabout to eliminate the need for a culvert, along with a schematic image shown in Figure 1 below.

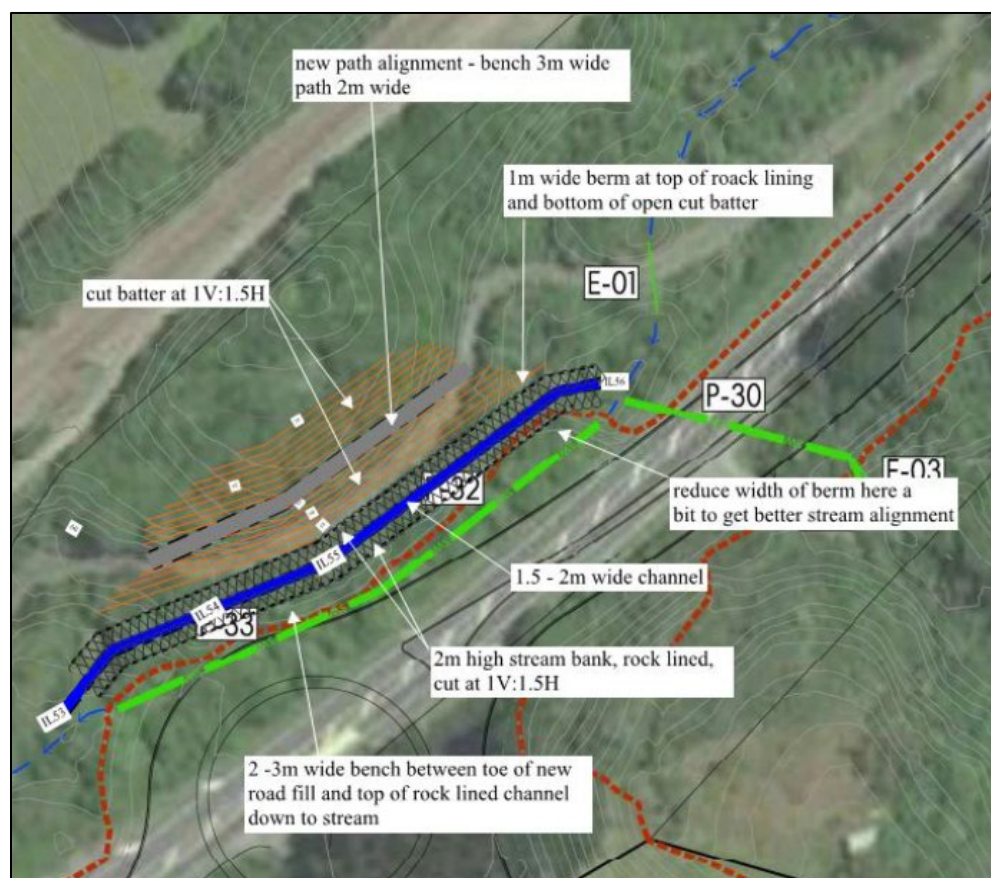


Figure 1: Schematic provided by Panel in Minute 4

- 15 Envelope Engineering have reviewed the alternative option and provided a concept plan which is attached as **Appendix B**. They note that this design would require:

- 15.1 Approximately 12,500m³ of cut (no fill) and 3,600m² of additional earthworks area;
- 15.2 3,050m² of additional vegetation clearance from SNA027;
- 15.3 To recreate the existing path alongside the northern side of the stream, a 5m bench platform is required that provides for a path with a berm on both sides (also allows for maintenance vehicle access);
- 15.4 1:2 average batter slopes allowing for 1:1.5 in rock and 1:2.5 slopes in Loess; and
- 15.5 New Stream length would be ~125m, with the existing alignment being ~130m.

Assessment of alternative concept

- 16 The Panel seeks: “an analysis of the pros and cons of the concept shown above, or variations thereof that the applicant’s advisors might identify, relative to the culverting proposed”. These are set out in **Appendix C** below by topic which is informed by:
 - 16.1 Dr Vaughan Keesing (BlueGreen Ecology) with regard to ecological matters;
 - 16.2 Brad Dobson (Blac) with regard to landscape matters; and
 - 16.3 Torrey McDonnell (Incite) with regard to planning matters.
- 17 In summary, Appendix B outlines that:
 - 17.1 The project ecologist considers that the loss of 3,050m² of SNA associated with the alternative concept proposed by the

Panel is a less desirable outcome in his opinion to the proposed culvert design.

17.2 The project landscape architect considers that on balance, the proposed culvert design represents the more favourable outcome from an overall landscape and visual effects perspective than the alternative concept proposed by the Panel. It avoids the greater visual effects on the escarpment landform and SNA vegetation while affecting a relatively low visibility section of stream with limited public interaction. The proposed culvert option is therefore preferred in his opinion as more of a known quantity/outcome than the alternative.

17.3 The project planner considers that at a high level, while both options require consent under the same sets of district and regional rules, they have different effects profiles that would need to be managed. Further, there may be challenges with the stream realignment option in terms of Clause 3.11 of the National Policy Statement for Indigenous Biodiversity.

18 The applicant has not undertaken an economic assessment to fully understand the feasibility of the alternative concept, and as such it is currently unknown which option is more cost effective. Redesigning the intersection is a large project in and of itself, and further information, economic analysis and engagement with relevant parties is required. This includes NZTA who manage this corridor (noting the stream realignment option would require more use of their land, and we have no indication as to whether they would agree to this as landowner), and parties such as PCC, GWRC, Ngāti Toa Rangatira, and KiwiRail given the proximity of the works to the Main Trunk Rail Corridor.

- 19 In addition to the design, consenting, construction, and compliance costs, both options require substantial offsetting. While land has been put aside for aquatic offsetting for the culvert, suitable land would need to be found for terrestrial offsetting for the alternative concept, and the economic costs quantified. Depending on where the offsetting land is required, this could potentially affect the yield of the development in terms of lots.

Conclusions

- 20 The applicant did consider stream realignment as an alternative to culverting, when developing the design of the proposed roundabout. The applicant also considered different locations for the intersection, as well as a different form of intersection which would avoid the need to reclaim the stream.
- 21 The proposed roundabout was determined to be the best option, based on expert opinion and engagement with various parties.
- 22 Appendix A provides the ecologists opinion as to the ecological outcomes of both options, Appendix B shows a concept design for the alternative concept, and Appendix C assesses the concept from a range of technical perspectives.
- 23 The initial views of ecology and landscape experts indicate that the preferred option is preferable to the alternative concept from their perspective.
- 24 For the reasons set out above, the applicant considers that the proposed culverting option remains the most appropriate option currently available. The alternative concept may avoid a section of culvert, but it introduces materially greater earthworks, additional SNA vegetation clearance, greater uncertainty around rehabilitation and offsetting, and unresolved feasibility and stakeholder issues. The applicant therefore

does not support progressing the alternative concept on the information presently available.

Appendices index

Appendix A: BlueGreen Ecology Memorandum

Appendix B: Envelope Engineering Concept Drawing

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Appendix A: BlueGreen Ecology Memorandum

15 July 2026

William Dorset (CC Tom Anderson)

Classic Developments

Email: William.Dorset@classicdevelopments.co.nz

Dear William

Following on from the Fast Track Panel Minute 4 you have asked me to relate the rationale in the initial assessment (included as Appendix 15 to the application) as to why I preferred the culverting of Ca 130m of the stream (where a roundabout is required by NZTA) in question (one of two headwater tributaries to the Taupo stream), as opposed to the realignment of the stream. A stream realignment would require a hill slope removal (cut) with loss of 3050m² of the Significant Natural Area (terrestrial habitat) (SNA) present in that area, and recontouring of that cut slope to create sufficient room for the realignment of the stream.

The essence of the assessment was that the condition and values of the stream are sufficiently low (and without obvious further gains via any form of future management) that its preservation by way of a realignment does not warrant the removal of such an area of SNA.

The "for and against" considerations that I made are outlined below.

For	Against
Maintains surface flow for 130m of a poor macroinvertebrate community, no fish, stream near its headwaters.	Removes an additional 3050m ² of SNA native broadleaf forest
	Requires extensive cuts back into the hill slope - escarpment and likely resultant terraced slope - non-natural land forms to rehabilitate. This will have water discharge effects which while likely minor (and managed) will add sediment to the stream.
	Sets back that SNA revegetation 30 to 60 years. Cuts the current SNA in half (i.e. nearly separates the remanent pieces) - increasing edge effects. The cut areas will require substantive rehabilitation efforts (topsoil's, mulch, plants, management) on artificial terrace and will require a new riparian development for the realigned stream.
	The works and realignment create a poor riparian condition in the new stream for around 5 to 10 years.
	The realignment does not improve or alter the absence of fish and fish passage barrier in the stream, and so the only gain is the retention of relatively poor quality macroinvertebrate habitat.

	Causes a residual adverse effect post rehabilitation of the cut area and riparian margin. This requires a further offset (because of time lag to achieve rehab).
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The gains achieved by realignment are minimal, given the difference in habitat quality between the current channel and the proposed culvert. The realignment also retains a risk in respect to the success of the realignment for aquatic instream values. It is a stream near its headwater and not a critical passage or source habitat. It does not resolve the downstream significant fish passage issue. The effects to undertake the realignment given the space available are significant and require long term management and intense rehabilitation of the SNA and the addition of an offset.

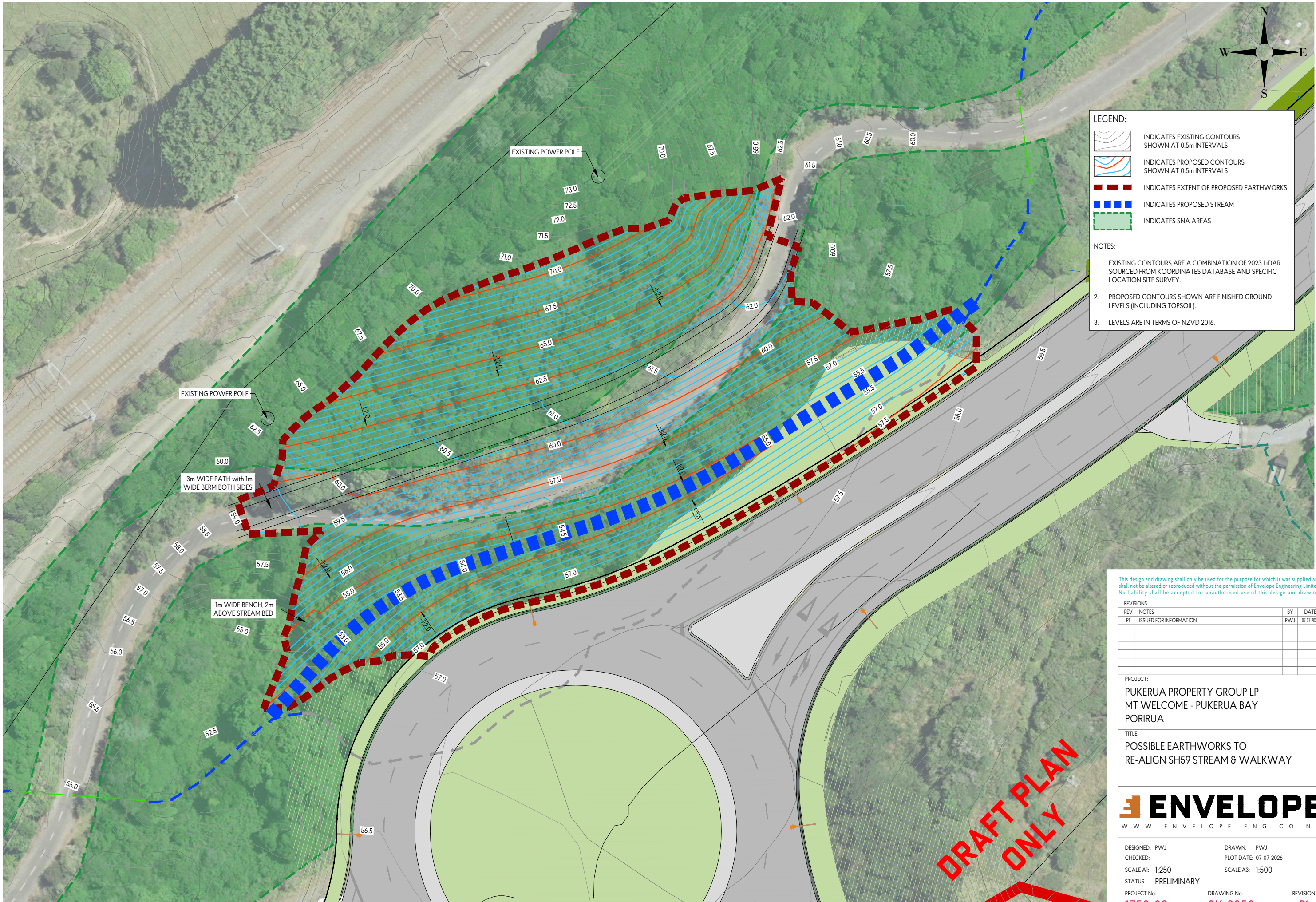
In summary, the low level of aquatic ecological value that would be preserved by realigning the stream is disproportionate to the loss of SNA, and the stream section is not worth the level of damage created to the SNA and the introduction of rehabilitation risk and added offset requirement.

Yours sincerely
Dr Vaughan Keesing



Ecologist
15.07.2026
BlueGreen Ecology Ltd.

Appendix B: Envelope Engineering Concept Drawing



LEGEND:

- INDICATES EXISTING CONTOURS SHOWN AT 0.5m INTERVALS
- INDICATES PROPOSED CONTOURS SHOWN AT 0.5m INTERVALS
- INDICATES EXTENT OF PROPOSED EARTHWORKS
- INDICATES PROPOSED STREAM
- INDICATES SNA AREAS

NOTES:

- EXISTING CONTOURS ARE A COMBINATION OF 2023 LiDAR SOURCED FROM KOORDINATES DATABASE AND SPECIFIC LOCATION SITE SURVEY.
- PROPOSED CONTOURS SHOWN ARE FINISHED GROUND LEVELS (INCLUDING TOPSOIL).
- LEVELS ARE IN TERMS OF NZVD 2016.

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REVISIONS:			
REV	NOTES	BY	DATE
P1	ISSUED FOR INFORMATION	PWJ	07-07-2026

PROJECT:
PUKERUA PROPERTY GROUP LP
MT WELCOME - PUKERUA BAY
PORIRUA

TITLE:
POSSIBLE EARTHWORKS TO
RE-ALIGN SH59 STREAM & WALKWAY



DESIGNED: PWJ	DRAWN: PWJ
CHECKED: ---	PLOT DATE: 07-07-2026
SCALE A1: 1:250	SCALE A3: 1:500
STATUS: PRELIMINARY	
PROJECT No: 1753-02	DRAWING No: SK-8350
	REVISION: P1

Appendix C: Assessment of Alternative Concept

Table 1: Assessment of alternative concept

Topic	Alternative concept
Ecological effects	The alternative concept has been reviewed by the project ecologist Dr Vaughan Keesing who advises that, while the alternative concept would maintain surface flow stream for ~130m of stream length, the stream is a relatively poor-quality macroinvertebrate habitat with no fish present. He notes: • The stream realignment associated with the alternative concept would result in poor riparian condition for at least 5 years after rehabilitation, and the associated vegetation clearance would result in the loss of 30 - 60 years' worth of forest growth; • It would bisect the current extent of the SNA027, separating it into separate remnant pieces which will cause adverse edge effects for the remaining vegetation; • It would substantive rehabilitation effort, and successful rehabilitation of the cut face would be difficult to achieve; and • It would result in a residual adverse effect post-rehabilitation of the cut area and riparian area. This would require a further offset because of time lag to achieve rehabilitation. BOAM modelling suggests need for 1 ha of offsetting in addition to the rehabilitation, using 15 species managed to 80% cover and taking approximately 20 years. • Overall, the alternative concept would result in only marginally better outcomes in terms of freshwater ecology, but materially worse outcomes in terms of terrestrial ecology.
Landscape and visual effects	The alternative concept has been reviewed by the project landscape architect Brad Dobson who provides the following commentary: Existing Values • The visual continuity of the SNA vegetation and the contribution it makes to natural character, particularly for those travelling along SH59, the existing walkway above, and the rail corridor. • The visibility of the open watercourse is currently restricted and, for people in transit, is effectively non-existent due to topography and existing vegetation. • The current open (assumed largely unmodified) waterway provides for strong landscape integrity in a context where many streams and waterways have been fragmented or culverted through urban modification. This particular stream already contains several culverted sections downstream of the proposal area. • Open waterways generally provide greater opportunity for people to interact with and appreciate natural systems. In practice, however, people

	tend to interact with waterways that are more accessible and located away from major transport corridors. Proposals Current Proposal • The current proposal would result in approximately 110–130m of the existing stream being culverted beneath the roundabout and associated earthworks. The culvert would be designed with embedded substrate and fish passage considerations to replicate natural stream processes as far as practicable. • This option avoids further removal of the SNA vegetation by reducing the extent of earthworks required to position the roundabout above and adjacent to the existing stream alignment. Alternative Proposal • The alternative option avoids culverting by realigning the stream around the roundabout footprint. However, achieving the required road geometry and stream grades would require additional earthworks into the adjacent escarpment and SNA vegetation. The concept earthworks indicate cuts into the hillside to create the required landforms and stream corridor. • As advised by BlueGreen Ecology, it is anticipated that this option would result in the removal of an additional approximately 3,000m² of SNA broadleaf forest and would effectively bisect the existing remnant, increasing edge effects and reducing ecological connectivity. Rehabilitation feasibility would need further consideration; however, we have assumed that it is possible in some way currently. Effects Commentary • From a landscape and visual perspective, there is a trade-off between retaining an open stream channel and retaining the existing SNA landform and vegetation, each with their own natural character/ underlying landscape value. • While retaining an open watercourse is generally preferable from a natural character and landscape integrity perspective, in this instance the visual and experiential benefits are relatively limited given the stream's low visibility from public viewpoints and transport corridors. Conversely, the existing SNA vegetation forms a highly visible and important component of the escarpment landscape and contributes strongly to the natural character and green backdrop of the SH59 corridor. • The alternative alignment would preserve approximately 110–130m of open stream channel but would do so at the expense of additional earthworks and vegetation removal, resulting in visual and landscape effects and requiring rehabilitation and ecological offsetting. The resultant landforms may also appear more engineered and less natural than the existing escarpment profile, at least in the short to medium term.
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	• It could reasonably be argued that, over time, these visual effects could be addressed through rehabilitation and vegetation establishment, and that the realigned stream could ultimately become more visible and accessible than it is currently, depending on the final design and planting approach adopted. • However, on balance, my initial view is that the current proposal represents the more favourable outcome from an overall landscape and visual effects perspective, as it avoids the greater visual effects on the escarpment landform and SNA vegetation while affecting a relatively low visibility section of stream with limited public interaction. This option is preferred as more of a known quantity/ outcome than the alternative. • It acknowledged the culverting of the stream does represent a further increment of urbanisation and modification of the waterway. Equally, however, a realigned stream channel would itself constitute a modified and engineered environment, albeit less visually obvious over time.
Planning considerations	The following is a high-level planning assessment prepared by project planner Torrey McDonnell based on available information: Porirua District Plan (PDP) The works associated with the alternative concept would not result in additional rule breaches to those listed in Section 11.1 of the Substantive Application, but they do increase the degree of effect associated with the rule breaches with the upgrading of existing roads and shared paths in the Infrastructure Chapter including: • additional earthworks in terms of area, slope and cut and fill • additional earthworks and removal of vegetation within a significant natural area The relevant objectives, policies and matters of discretion that must be considered are the same as for the proposed roundabout design, and include policies in the Ecosystems and Indigenous Biodiversity Chapter that require the application of the effects management hierarchy by a suitably qualified ecologist. Provided the adverse effects are appropriately managed in line with ecological advice including offsetting residual effects associated with vegetation clearance, the alternative concept could be consistent with the relevant objectives and policies in the District Plan. It is assumed that the potential adverse effects associated with the additional earthworks could be managed with appropriate erosion and sediment control measures including an update to Appendix 30-34 - 1753-02-8240-R1-SH59-Proposed-ESCP. Natural Resources Plan (NRP) The works associated with the alternative concept do not result in additional rule breaches to those listed in Section 11.2 of the Substantive Application, consents are already sought for land disturbance, discharges of contaminants, use of the beds of lakes and rivers, diversion of water.

	The effects profile of the alternative concept is different and would require different management and input from relevant disciplines, especially in regard to freshwater ecology. Provided the adverse effects are appropriately managed in line with ecological advice including offsetting residual effects associated with the realignment of Taupō Stream, the alternative concept could be consistent with the relevant objectives and policies in the NRP. There are objectives and policies in both the NRP and the Regional Policy Statement (RPS) that seek to provide for the rights and interests of mana whenua in the management of freshwater⁶. It is possible that the alternative concept has a lower cultural effects profile than the proposed option, but this would need to be confirmed by Ngāti Toa Rangatira. If the cultural effects are lower, then the alternative concept may be more consistent with these NRP and RPS objectives and policies. Again, it is assumed that the potential adverse effects associated with the additional earthworks could be managed with appropriate erosion and sediment control measures including an update to Appendix 30-34 - 1753-02-8240-R1-SH59-Proposed-ESCP. NES-F and NPS-FM The works associated with the alternative concept do not result in additional regulations to those listed in Section 11.2 of the Substantive Application with regard to the NES-F, consents are already sought for activities in and near the Stream, including Regulation 57 with regard to the reclamation of part of the Taupō Stream. Both the proposed and alternative concepts would trigger Regulation 57 as they both involve reclamation. The effects profile of the alternative concept is different and would require different management and input from relevant disciplines, especially in regard to freshwater ecology. Provided the effects management hierarchy is applied in line with ecological advice including offsetting residual effects associated with the realignment of Taupō Stream, the alternative concept could be consistent with the relevant objectives and policies in the NPS-FM. It is noted that both options need to demonstrate a 'functional need' under Regulation 57(2)(a). The objective and policies in the NPS-FM seek to provide for Te Mana o Te Wai, and the rights and interests of mana whenua in the management of freshwater⁷. It is possible that the alternative concept has a lower cultural effects profile than the proposed option, but this would need to be confirmed by Ngāti Toa Rangatira. If the cultural effects are lower, then the alternative concept may be more consistent with the NPS-FM objective and policies. NPS-IB The NPS-IB presents challenges to the stream realignment. Clauses 3.10(2) and 3.11 are directive in terms of adverse effects on an SNA must be avoided, except in
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⁶ See pages 28-32, 34-35, 38-41, 43-45 and 58-60 of Appendix 5 of the Substantive Application.

⁷ See pages 28-32, 34-35, 38-41, 43-45 and 58-60 of Appendix 5 of the Substantive Application.

	particular circumstances. This sets a high bar, requiring consideration of functional and operational need, and analysis of alternative options that have less effect, such as the proposed culvert option (or use of a signalised intersection). Summary To make a determinative assessment on the appropriateness of the alternative concept, more detailed assessment is required from technical experts in regard to terrestrial and freshwater ecology, civil engineering and earthworks and construction management. Further engagement with Ngāti Toa Rangatira would be required with regard to cultural effects. However, at a high level it does not appear that there are planning considerations that preclude the alternative concept.
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