

**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 18

5 October 2026

INFORMATION REQUEST

- 1 This memorandum responds to directions from the Panel in Minute 18 (dated 4 September 2026). In particular, it addresses the Panel's concerns at paragraphs 15 to 19 about the ownership, management, functionality and adequacy of the proposed stormwater and ecological mitigation and offsetting areas. Paragraphs 15 to 19 state:

[15] Last, but certainly not least, the Panel seeks further information from the applicant as to how it proposes to ensure the functionality of stormwater management in the context of the proposed retention wetlands providing both ecological mitigation/ offsetting and stormwater management in the same footprint. This should include:

- (a) Discussion of ownership given the advice from Tiaki Wai and PCC that neither are likely to accept vesting of the facilities as currently configured;*
- (b) Discussion of options to separate ownership and management of ecological mitigation and offsetting areas, from areas managed for stormwater purposes, and what implications that has for the functionality and adequacy of both. The Panel suggests that the applicant consider if broader redesign options might be more viable and sustainable than 'carving-up' the areas of the site already allocated for these purposes.*

[16] The applicant's response to this request is required by noon on 11 September. Once produced, other parties have until noon on 16 September to provide comment on the applicant's response

[17] The Panel records that it is extremely concerned that as currently configured, quite apart from the ongoing ownership issue noted above, which is a significant matter in itself, the dual use of the same footprint for stormwater management and ecological mitigation/ offsetting in the context of the relatively steep sided gullies on the site has the potential to give rise to significant adverse effects that cannot readily be adequately managed by conditions and which are not clearly outweighed by the obvious benefits the project would have.

[18] That position has obvious implications for the Panel's final decision.

[19] The Panel would strongly urge the applicant to consider what alternative design and management options are available to it in the above circumstances. If the applicant seeks a suspension of processing to consider the position in a less compressed timescale than is available otherwise, the Panel would almost certainly consent to that.

- 2 The Applicant's team of technical experts has provided information to respond to matters relevant to their disciplines as follows:

- 2.1 Torrey McDonnell (Incite) with regard to planning matters and lead author of this Memorandum;
- 2.2 Kyle Dirse (Envelope Engineering) with regard to civil engineering matters (Appendix A):

- 2.2.1 Alternative Stormwater Strategy;
- 2.2.2 Alternative Stormwater Management Plan;
- 2.2.3 Updated Stormwater Build and Flood Assessment Report;
- 2.2.4 Updated Wastewater Hydraulic Modelling Report;
- 2.2.5 Alternative Proposed Ecological Remediation and Offset Overall Layout (1753-02-SK9200);
- 2.2.6 Alternative Overall Ecological Areas (1753-02-SK9250);
- 2.2.7 Alternative Scheme Plans for the Proposed Development (1000 series);
- 2.2.8 Alternative Stormwater Detention Ponds (1753-02-4300);
- 2.3 Vaughan Keesing (Blue Green) with regard to ecological matters including a Memorandum on Alternative Wetland and Stream Offset (**Appendix B**);
- 2.4 Katy Grant (PDP) with regard to hydrology matters (**Appendix C**):
 - 2.4.1 Memorandum – Alternative Offset Wetland Hydrological Assessment;
 - 2.4.2 Memorandum - Wetland Hydrology Model for Alternative Stormwater Design; and
- 2.5 Brad Dobson with regard to Alternative Landscape and Ecology Plans (**Appendix D**).

DISCUSSION

Alternative proposal for attenuation and offsetting

- 3 Following Minute 18 and consideration of the views expressed by other parties, the Applicant developed the alternative design described below. Processing of the application was suspended from 8 September to 5 October 2026 to allow the multidisciplinary team to complete that work.
- 4 It should be noted that the stormwater and wetland regime in the lodged application, as supplemented by information subsequently provided to the Panel, remains the Applicant's

preferred option. The Applicant nevertheless advances the alternative proposal as a technically supported response to the ownership, management and functional-separation concerns identified in Minute 18.

5 In developing the alternative, the Applicant met with Tiaki Wai, PCC and GWRC to understand their respective requirements. Tiaki Wai advised that it would accept ownership only of land whose primary function is stormwater management, and that ownership could be confirmed only once each area's purpose was defined within an optimised whole-of-site stormwater management solution. The alternative responds to that requirement by separating the stormwater and ecological functions.

6 The project team has had several multidisciplinary workshops to explore this alternative design that achieves the same engineering and ecological outcomes as the original proposal, while proactively responding to the views of Tiaki Wai and other parties.

7 Mr Dirse outlines the alternative approach in his Memorandum labelled Alternative Stormwater Strategy. This option is reflected in an alternative set of plans attached as Appendix A showing:

7.1 Wetland and stream remediation areas have been removed from the footprint of the former retention wetlands (the 1% AEP extent);

7.2 The former retention wetland areas have been relabelled as 'stormwater detention ponds' and are shown as fee simple areas to be owned by Tiaki Wai in updated scheme plans;

7.3 Existing offsetting areas are retained as recreation reserve to be vested in PCC, as well as the additional wetland offset areas proposed within lots 5001 and 5002¹;

7.4 To account for the lost remediation areas in (what were) retention wetlands A, B, C and E, an additional 450m of liner stream remediation (with 10m of planting on

¹ Refer annotated map in Dr Keesing's memorandum.

either side) and an additional area of 1.25ha for wetland offsetting has been identified in the Kakaho East Catchment;

7.5 These Kakaho East Catchment areas are within balance Lot 5003 to be retained by the Mt Welcome Family Trust, they will be subject to fencing requirements, and ongoing legal protection in the form of a conservation covenant (refer updated scheme plans);

7.6 The scheme plan has been updated to provide access for the Applicant to undertake their ongoing maintenance obligations under consent conditions.

8 The proposed offsetting areas have been informed by ecological advice as outlined in Dr Keesing's Memorandum in **Appendix B**, and hydrological advice as outlined in Ms Grant's Offset Wetland Hydrological Assessment in **Appendix C**. This advice is summarised below in turn.

9 Rainwater tanks are addressed later in this memorandum. This is an option available to the Panel regardless of the decision to go with the original proposal in all other respects.

Alternative proposal – summary of ecological advice

10 Dr Keesing advises that, if retention wetlands A, B, C and E are reconfigured and managed as stormwater detention ponds with provision for potential machine access and sediment removal, they should not also be relied on to provide the wetland remediation, wetland offsetting and stream-habitat functions identified in the lodged proposal. Under the alternative proposal, Dr Keesing advises that those ecological functions would therefore be provided in separate, expressly protected areas, and an additional area of land is required within the Kakaho East catchment.

11 For wetland effects, the alternative provides approximately 12,500m² of wetland offsetting in the general areas used in the lodged application and approximately 12,100m² of new potential wetland offsetting in the Kakaho East catchment, giving a total available area of approximately 24,600m². This exceeds the identified requirement of 22,211m² by approximately 2,389m². The Kakaho East area would include enhancement of existing

pasture-dominated wetlands and creation of new natural inland wetland through minor excavation of the valley floor.

- 12 In relation to stream effects, the alternative proposal retains the separate enhancement of approximately 195m of the Kakaho West main stem to offset the proposed culverting of 110m of the Taupō Stream tributary.
- 13 Dr Keesing considers a 1:1 offset ratio is appropriate to offset the loss of 450m of stream-habitat functions resulting from the use of the retention wetlands as dedicated stormwater detention areas, i.e. they are no longer considered to be performing an ecological function due to the ability of Tiaki Wai to undertake any maintenance works that they see as necessary. He advises that the 450m of stream enhancement should consist of 10m of woody vegetation planting on either side of the stream. The 1:1 ratio is considered to be appropriate as the streams affected by the development are presently in poor condition and are subject to stock access, pollutants and other modifications. By comparison, the proposed Kakaho East works would provide immediate ecological gains through fencing and stock exclusion, with further gains arising as the riparian planting matures and provides increased shade, organic matter and habitat.
- 14 Although located in a different catchment, Dr Keesing considers the Kakaho East offset area to be of at least equivalent ecological value. The catchment drains to the more sensitive Te Awarua-o-Porirua / Pāuatahanui Inlet and supports higher-value fish habitat, while the adjoining stream enhancement, riparian planting and wetland creation would deliver integrated valley-floor restoration.
- 15 Dr Keesing advises that fish passage is not required into stormwater ponds A, B and C, as they would no longer provide fish habitat and little suitable habitat remains upstream. Fish passage would, however, remain important at former retention wetland E and should be reflected in the final design.
- 16 The offset works can be implemented progressively alongside development staging, provided each stage is matched by corresponding offset actions. Dr Keesing recommends fencing the entire Kakaho East offset area to exclude stock, with implementation,

monitoring and maintenance managed through the proposed Ecology and Hydrology Management Plan.

- 17 The Landscape and Ecology plans have been updated by Mr Dobson from Blac and provided as **Appendix D** to show updated planting in all freshwater management areas based on Dr Keesing's advice.

Alternative proposal – summary of hydrological advice

- 18 Ms Grant's hydrological assessment confirms that the proposed offset wetlands within the Kakaho East catchment are hydrologically feasible. The assessment identifies existing valley-floor drainage features, peat deposits and groundwater seepages that indicate conditions capable of supporting wetland hydrological processes. A water balance assessment found that the proposed wetlands are supported by a large upstream catchment, with available water volumes substantially exceeding those required to sustain wetland function. Ms Grant concludes that, subject to detailed design to retain water within the offset areas, the hydrological conditions are suitable to support the establishment and long-term functioning of the proposed wetland offsets.

Alternative proposal – the Applicant's views

- 19 As mentioned above, the stormwater and wetland regime in the lodged application, as supplemented by information subsequently provided to the Panel, remains the Applicant's preferred option. The Applicant nevertheless advances the alternative proposal as a technically supported response to the ownership, management and functional-separation concerns identified in Minute 18.
- 20 This original approach was designed by a multi-disciplinary team and provides freshwater management areas that seek to achieve multiple outcomes. The Applicant notes that this approach aligns with Tiaki Wai's own description of 'water sensitive design'²:

² <https://www.tiakiwai.co.nz/your-water-2/land-development/water-sensitive-design>

Water sensitive design (WSD) is an inter-disciplinary design approach, which considers stormwater management in parallel with the ecology of a site, best practice urban design, and community values.

WSD aspires to ensure multiple public benefits from stormwater management and to develop a unique 'sense of place' for our communities. It also seeks to deliver low risk and better return on investment for land developers.

- 21 The Applicant has not identified the specific effects underlying the Panel's reference in Minute 18 to potential "significant adverse effects" from the lodged approach. The Applicant's experts assess the ecological effects of that approach as less than minor³.
- 22 The Applicant considers that the alternative provided in Appendix A can achieve at least equivalent ecological outcomes. It would however require a substantially larger offset area in the Kakaho East catchment, together with associated planting, maintenance and monitoring, and would therefore impose greater costs than the lodged approach. The Applicant considers that the associated conditions requiring the alternative design would be more onerous than necessary because they are only to address effects that are, in the views of the experts providing advice to the Applicant, less than minor.
- 23 However, the Applicant acknowledges the benefits associated with the alternative proposal with regard to providing a clearer jurisdictional delineation of functions for vesting land in either PCC or Tiaki Wai, in light of the concerns raised by those parties.

Alternative proposal – Tiaki Wai's views

- 24 The Applicant has met with Tiaki Wai in the development of this approach and provided the final drafts of the plans to them for comment.
- 25 Tiaki Wai advise that they consider that this is a "positive step", however they have advised that they "cannot confirm ownership of individual components in isolation. Ownership can

³ Refer to Appendices 15 (Ecological Assessment) and 18 (Hydrology Assessment) of the Substantive Application.

only be confirmed once the purpose of each area is clear within an optimised whole-of-site stormwater management solution.”⁴

- 26 Following this feedback, the Engineering Memorandum in Appendix A was updated with further contextual detail in relation to the purposes of freshwater management areas, but the Applicant otherwise considers that the alternative proposal put forward does equate to an optimised whole-of-site stormwater management solution with regard to managing potential adverse environmental effects while ensuring a clear jurisdictional delineation of functions.
- 27 The Applicant understands that Tiaki Wai and PCC have met separately to discuss criteria for vesting.
- 28 The Applicant observes that the criteria governing which assets and areas should be managed by Tiaki Wai or PCC remain under development following the relatively recent formation of Tiaki Wai. The Structure Plan was developed under PCC’s previous three waters services model, which has complicated matters for this Application.

Rainwater tanks and raingardens

- 29 The alternative stormwater design proposed in Mr Dirse’s Memorandum introduces a 3,000 L rainwater tank on every residential lot, comprising 2,000 L of storage for outdoor water use and 1,000 L of detention storage discharged at a controlled rate. As noted above, this is an option available to the Panel even if it decides to adopt the original proposal in all other respects.
- 30 The revised design retains the previously proposed raingardens without increasing their size, as roof runoff is first directed to the tanks and the raingardens continue to exceed the applicable sizing criteria when assessed against the remaining impervious area. The tanks

⁴ By email 5 October 2026.

provide additional hydrological control at source by capturing and reusing roof runoff while maintaining the existing stormwater treatment framework.

- 31 Ms Katy Grant updated PDP's water balance modelling to assess the hydrological effects of the alternative stormwater design, including the introduction of rainwater tanks and the conversion of retention wetlands to stormwater detention ponds. The modelling incorporated both the detention and reuse functions of the tanks and compared the results with the Applicant's preferred stormwater design and baseline conditions.
- 32 Ms Grant concludes that the introduction of rainwater tanks does not materially alter wetland hydrology, catchment discharge patterns or stream flows when compared with the Applicant's preferred stormwater design. In the Taupō catchment, the alternative design results in broadly the same wetland and stream flow effects as the preferred option, while in the Kakaho West catchment the inclusion of tanks does not result in significant effects on downstream wetlands and only minor changes in modelled flows. Overall, PDP concludes that there is little material difference between the preferred and alternative stormwater designs from a wetland hydrology and stream flow perspective.
- 33 The provision for rainwater tanks responds directly to Tiaki Wai's concerns about raingarden sizing. However, Tiaki Wai nevertheless consider that rainwater tanks be provided with greywater reuse within dwellings.
- 34 Ms Grant also assessed a scenario involving more extensive greywater reuse from the rainwater tanks. While this produced some minor reductions in flow volumes, the modelling indicated negligible benefit in the Taupō catchment and potential adverse hydrological consequences in the Kakaho West catchment through further reductions in stream flows. Accordingly, Ms Grant considers the Applicant's preferred design and the alternative rainwater tank design to be preferable to the greywater reuse scenario.

Flood modelling

- 35 Mr Dirse advises that the revised flood assessment includes catchment-wide flood modelling extending beyond the site through Taupō Swamp and the Plimmerton urban area.

The updated modelling assessed the development under a 1% AEP event with climate change and compared pre- and post-development conditions.

- 36 The modelling indicates that the revised stormwater strategy does not materially increase downstream flood risk. Peak flows through Taupō Swamp are predicted to reduce, flood depths in the upper swamp decrease by 88–99 mm, and downstream changes are within the accuracy limits of the modelling, with no change in flood extent. Tiaki Wai independently reviewed the modelling and agreed that flooding effects in Plimmerton would be less than minor⁵.
- 37 Accordingly, Mr Dirse concludes that the revised stormwater strategy achieves hydraulic neutrality, provides effective attenuation of peak flows, and results in less than minor downstream flooding effects while supporting a clear and maintainable long-term stormwater management framework.

CONCLUSION

- 38 The Applicant considers that the alternative proposal provides a practicable and durable response to the matters raised in Minute 18. It separates the ownership and management of stormwater assets from ecological remediation and offsetting areas, provides separately protected replacement ecological areas, retains effective stormwater attenuation, and avoids material increases in downstream flood risk. The Applicant accordingly asks the Panel to assess the application on the basis that the alternative proposal and the supporting material in Appendices A to D are available to address the Panel's concerns about ownership, management, functionality and adequacy.
- 39 The Applicant can provide updated conditions of consent to the Panel on request, noting that the alternative stormwater/wetland proposal could be given effect to through incorporation of the amended plans and reports as part of general condition G1.

⁵ Refer appendix 4 of the Updated Stormwater Model Build and Flood Assessment dated 28 September 2026 (Appendix A3 to this memo).

Appendices index

Appendix A: Engineering Reports and Plans:

Appendix A1: Alternative Stormwater Strategy

Appendix A2: Alternative Stormwater Management Plan

Appendix A3: Updated Stormwater Build and Flood Assessment Report

Appendix A4: Updated Wastewater Hydraulic Modelling Report

Appendix A5: Alternative Ecological Remediation and Offset (1753-02-SK9200-Series-R2-2026-10-01)

Appendix A6: Alternative Overall Ecological Areas (1753-02-SK9250-R2-2026-10-01)

Appendix A7: Alternative Scheme Plans for the Proposed Development (1000 series)

Appendix A8: Alternative Stormwater Detention Ponds (1753-02-4300)

Appendix B: Ecology Memorandum - Alternative Wetland and Stream Offset

Appendix C: Hydrology memoranda:

Appendix C1 Memorandum – Alternative Offset Wetland Hydrological Assessment

Appendix C2: Memorandum - Wetland Hydrology Model for Alternative Design

Appendix D: Alternative Landscape and Ecology Plans:

Appendix D1: Alternative Landscape and Ecology Plans_Part 1

Appendix D2: Alternative Landscape and Ecology Plans_Part 2