

Fast-track project name	Mt Welcome, Pukerua Bay, Porirua
Fast-track application number	FTAA-2603-1181
GW file number	FTA260348

To	The Expert Panel
Date	16 October 2026

Comments on the applicant's alternative proposal for stormwater management

Introduction

1. This memorandum is filed on behalf of the Wellington Regional Council (Greater Wellington) in response to the request of the Expert Panel to comment on the Applicant's alternative proposal for stormwater management, at paragraph [8] of Minute 21 dated 6 October 2026¹.
2. This memorandum addresses the following matters:
 - (a) Greater Wellington's understanding of the alternative proposal for stormwater management.
 - (b) Technical comments from Greater Wellington's stormwater management expert, Mr Roa, on the effectiveness of the alternative proposal.
 - (c) Further uncertainties introduced by the alternative proposal.
 - (d) Comments on the amendments to regional resource consent conditions associated with the alternative proposal.
 - (e) Concluding comments on whether the alternative proposal represents a successful reconsideration of the approach to stormwater management.
3. This memorandum does not address the freshwater ecology aspects of the alternative proposal. Greater Wellington defers any comments on freshwater ecology to the outcome expert conferencing on freshwater ecology directed by Minute 21, which is ongoing at the time of filing this memorandum.

¹ See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/37511/Minute-21-of-the-Panel.pdf

The alternative proposal for stormwater management

4. Greater Wellington understands the principal differences between the application and the alternative proposal are:
- (a) The “retention wetlands” have been replaced with “detention ponds”. The detention ponds occupy substantially the same area as the retention wetlands, except that they have been filled in so that they have a flat base to maintain 100mm of permanent water depth. The dams that form the detention ponds appear to have substantially the same design, as do the culverts and ancillary structures associated with them.
 - (b) 4m wide all-weather maintenance access tracks have been provided to each detention pond.
 - (c) 3,000L rainwater tanks have been proposed for each residential allotment, to be secured by way of consent notice. These comprise 2,000L of storage for external re-use, and 1,000L of extended detention.
 - (d) Except for the provision for fish passage through Detention Pond E, all freshwater ecological remediation, offsetting, or compensation obligations have been removed from the detention ponds. Wetland offsetting and stream compensation are provided for separately within the wider application site.
5. In all other respects, the stormwater management approach for the development remains substantially the same as the approach that was lodged with the application. The general arrangement of raingardens and reticulated stormwater networks, and the location and design of outlets and discharge points within the development remains unchanged. There is no change to the management of stormwater discharges associated with the redevelopment of SH59.

Technical comments on stormwater management

6. Greater Wellington’s stormwater management technical expert, Mr Andrés Roa, has reviewed the stormwater management aspects of the alternative proposal. Mr Roa’s comments are set out on the following attachments to this memorandum:
- (a) **Attachment 1** provides Mr Roa’s assessment of the alternative proposal against the matters that relate to stormwater management within the Engineering Caucus Joint Witness Statement, dated 21 August 2026 (signed 24 August 2026)².

² See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/33641/FTAA-2603-1181-Engineering-Caucus-Joint-Witness-Statement-FINAL_24-Aug-26-Signed.pdf

- (b) **Attachment 2** provides Mr Roa's assessment of the alternative proposal against Greater Wellington's section 53 technical comments on stormwater management³.

7. It is evident from Mr Roa's assessment in Attachments 1 and 2 that the alternative proposal does not address or resolve most of the technical matters related to stormwater management identified in Greater Wellington's section 53 comments, and in the joint witness statement prepared by the infrastructure experts.

Uncertainties introduced by the alternative proposal

8. In addition to the unresolved technical matters identified by Mr Roa, the alternative proposal introduces new uncertainties that would also need to be resolved. These include:

- (a) **Planting of detention ponds.** The proposed planting for the detention ponds is uncertain. The alternative Stormwater Management Strategy and Stormwater Management Plan state that the permanent water level will be planted with species appropriate to a damp environment⁴. On the other hand, the alternative Landscape and Ecology Plans indicate that the detention ponds will be planted with hydroseeded grass⁵. Greater Wellington has reservations about whether hydroseeded grass will effectively establish or survive within a stormwater management device that has a permanent water level of 100mm.
- (b) **Additional earthworks to form detention ponds.** In addition to the earthworks necessary for the formation of the dams to create each detention pond (which appear not to have changed), earthworks will be required to fill in the gullies up-gradient of each dam for form the base of each detention pond. However, these additional earthworks are not reflected in the proposal documentation, and the impacts on earthworks staging and any necessary erosion and sediment controls do not appear to have been considered. Greater Wellington considers that the Earthworks Construction Management Plan and the associated earthworks drawings and erosion and sediment control plans would need to be updated to recognise the additional earthworks and provide for appropriate erosion and sediment control measures.
- (c) **Future consenting requirements for maintenance within Detention Ponds B, C and E.** Because Detention Ponds B, C, and E are located on existing permanent or

³ See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0022/31963/08c.-GWRC-Appendix-2-Technical-Comments-Stormwater-Management.pdf

⁴ Alternative Stormwater Strategy, 30 September 2026, p. 2. See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0018/37503/Appendix-A1-Alternative-Stormwater-Strategy.pdf
Alternative Stormwater Management Plan, 30 September 2026, p. 24. See:

https://www.fasttrack.govt.nz/_data/assets/pdf_file/0019/37504/Appendix-A2-Alternative-Stormwater-Management-Plan.pdf

⁵ See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/37500/Appendix-D1-Alternative-Landscape-and-Ecology-Plans_Part-1.pdf
and https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/37501/Appendix-D2-Alternative-Landscape-and-Ecology-Plans_Part-2.pdf

intermittent streams⁶, the areas of permanent water within Detention Ponds B, C and E would continue to meet the definition of “river” under section 2 of the RMA (specifically, they would be modified watercourses within that definition). Notwithstanding the removal of freshwater remediation, offsetting, or compensation obligations from the detention ponds, consents would likely still be required to undertake future maintenance (including sediment removal and vegetation clearance) within the permanent water levels of Detention Ponds B, C and E, on the basis that their permanent water levels would continue to be rivers. Greater Wellington defers to Tiaki Wai as to whether this is acceptable for stormwater assets that would be vested to them.

Applicant proposed amendments to conditions

9. Greater Wellington considers that the outstanding issues identified above must be resolved in advance of the Panel’s decision to provide reasonable certainty that the effects of stormwater discharges can be adequately managed through conditions. If these matters are not resolved in advance of the Panel’s decision, Greater Wellington considers that the effects of stormwater discharges cannot be adequately managed through the conditions that are currently before the Panel.
10. However, if the outstanding issues identified above are resolved in advance of the Panel’s decision, Greater Wellington considers that the master set of regional consent conditions (incorporating the applicant’s proposed amendments to conditions in response to Minute 21⁷) could provide a sound framework for managing the effects of stormwater discharges, subject to the following comments:
 - (a) **Consents for placement of dams required for Detention Ponds B, C, and E.** The applicant’s proposed amendments to the Regional Resource Consents Matrix amends the consents required so that only Detention Pond E would receive consent for the placement of a new dam. The applicant explains that this is because they consider that only Detention Pond E is required to provide fish passage. However, it is not the provision of fish passage that causes the need for consent for the placement of a dam. Rather, consent for the placement of a new dam is required for Detention Ponds B, C, and E because these structures are located in the bed of a river (see discussion at paragraph 8(c)), and the dams do not meet the permitted activity conditions under Rule R127. Consents for the placement of new dams at Detention Ponds B, C, and E is required under rules R145 and R147 of the NRP.

⁶ As identified in Substantive Application Appendix 15 Ecological Assessment, p. 10. See:

https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/24461/Appendix-15-Ecological-Assessment.pdf

⁷ See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0029/37577/261008-Regional-conditions-Minute-21-version.pdf

- (b) **Reliance on Condition G1.** The applicant has stated that the alternative stormwater/wetland proposal could be given effect to through incorporation of the amended plans and reports as part of general condition G1⁸. This would only be the case where the documents referred to in condition G1 are internally consistent. Greater Wellington considers that all the outstanding matters identified by Mr Roa, as well as the further uncertainties identified paragraph 8 above (relating to planting and earthworks), would need to be resolved and the relevant documentation updated for condition G1 to provide for reliable implementation of the alternative proposal.
- (c) **Stormwater Detailed Design (Condition R39).** The list of matters that must be included in the stormwater detailed design would need to be resolved to incorporate specific design for the full treatment train, including the detention ponds, raingardens, and rainwater tanks. Greater Wellington considers that, as a minimum, this condition should include the list of matters set out under Condition 82 of the regional consent conditions contained in Appendix 1 to Greater Wellington's section 53 comments⁹.
- (d) **Stormwater discharge performance (Conditions R50B, R50C, R50D, and R50E).** Greater Wellington continues to consider that stormwater discharge performance conditions will be necessary to ensure that discharges from the treatment train do not result in unanticipated adverse effects on water quality downstream. Greater Wellington therefore considers that Conditions R50B, R50C, R50D, and R50E must be included in any final set of conditions. Discharge performance measures (under Condition R50B) would need to be set once the outstanding technical matters identified with the alternative proposal have been resolved.
11. Greater Wellington reserves comment on the conditions in relation to freshwater ecology until after the outcomes of expert conferencing have been reported.

Concluding comments

12. In its Section 53 comments on the application, Greater Wellington stated that the stormwater management approach for the development needed to be reconsidered for the proposal to be consistent with the objectives and policies for stormwater management set out in the NRP

⁸ Applicant Memorandum in response to Panel Minute 18, 5 October 2026, para. 39. See:

https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/37502/261005-Applicant-Response-to-Minute-18.pdf

⁹ See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0021/31962/08b.-GWRC-Appendix-1-Greater-Wellington-Draft-Regional-Resource-Consent-Conditions.pdf

and NRP-PC1¹⁰. Greater Wellington considered that any successful reconsideration of the stormwater management approach would:

- (a) Incorporate water sensitive urban design measures, including source control;
- (b) Provide a treatment train that incorporates adequately sized and designed contaminant treatment and hydrological control measures;
- (c) Avoid unmanaged point source discharges of stormwater;
- (d) Provide a system that can be reasonably maintained on an ongoing basis.

13. The alternative proposal introduces measures that partially address some of these matters. Rainwater tanks, if adequately sized and designed, would introduce an element of source control for some impervious surfaces (roofs). Separating out freshwater ecological remediation, offsetting, and compensation obligations from stormwater management devices reduces constraints on maintenance (although consents may still be required to maintain Detention Ponds B, C, and E as they will continue to be located within rivers).
14. Notwithstanding these improvements, it is evident from the range of unresolved matters identified above and in Attachments 1 and 2 that the alternative proposal does not represent a successful reconsideration of the stormwater management approach. The quality of stormwater discharges from the detention ponds remains uncertain. It is not evident that the treatment train is adequately sized or designed to achieve hydrological control of discharges. Parts of the reticulated network continue to bypass contaminant treatment and the detention ponds. The alternative proposal is designed in a manner that places regulatory constraints on future maintenance.
15. Finally, Greater Wellington wishes to emphasise the importance of Tiaki Wai's position on the adequacy of the stormwater management approach. The application is based on transferring the stormwater management assets and the associated discharge permit to Tiaki Wai to operate, maintain, and comply with on an ongoing basis¹¹. If Tiaki Wai are not sufficiently satisfied with the system to accept the transfer of assets and the discharge permit, the Panel must be satisfied that the applicant is capable of successfully operating and maintaining the system for at least the full 35-year duration of the permit, and that any conditions are appropriate for this circumstance.

¹⁰ Greater Wellington Section 53 Comments, para. 61. See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/31961/08.-Greater-Wellington-Regional-Council-GWRC-comments-received.pdf

¹¹ Not including stormwater management assets associated with the redevelopment of SH59. NZTA's position on whether they are satisfied with the stormwater management approach for SH59 remains unresolved, noting that they sought further treatment measures be incorporated in the design as part of their section 53 comments on the application. See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0021/31953/New-Zealand-Transport-Agency-Waka-Kotahi.pdf

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