

Your Comment on Mt Welcome, Pukerua Bay, Porirua

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
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Email (a valid email address enables us to communicate efficiently with you)			

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Wellington Conservation Board submission on the Fast Track Substantive Application: Mt Welcome, Pukerua Bay, Porirua under the Fast-track Approvals Act 2024

July 2026

About Us

The Wellington Conservation Board is a statutory body established under the Conservation Act 1987.

One of the functions of the Board is to advise the Director-General of Conservation on conservation matters within the jurisdiction of the board.

Board members are drawn from a wide range of backgrounds and disciplines, including statutory planning processes, recreation, infrastructure development, science, nature conservation, volunteerism, environmental policy and ecology.

The Board's jurisdiction includes the area of the application by Pukerua Property Group Limited Partnership.

Introduction

The Wellington Conservation Board appreciates the opportunity to comment on the ecological aspects of the Pukerua Property Group Limited Partnership's Mount Welcome Subdivision proposal.

The Board recognises the importance of providing additional housing for the Wellington region. However, we believe development should be undertaken in a manner that protects and enhances indigenous biodiversity, maintains ecological resilience and safeguards the health of connected freshwater and coastal ecosystems.

The Board supports environmentally responsible development that provides for the needs of growing communities. The question before the Panel is whether the ecological evidence demonstrates that the proposal will protect and enhance indigenous biodiversity, freshwater ecosystems and ecological connectivity across the wider catchment over the long term. Where uncertainty remains, the Board considers a precautionary approach is warranted.

Our submission focuses primarily on:

- Ecological assessment and areas of concern
- Wetlands and freshwater biodiversity
- Ecological connectivity and downstream effects

Ecological Assessment and Areas of Concern

Wellington Conservation Board has reviewed the ecological assessment prepared for the proposed development by BlueGreen Ecology to determine whether the ecological information provided is sufficient to accurately assess adverse effects on indigenous biodiversity and demonstrate compliance with relevant ecological policies, including the National Policy Statement for Indigenous Biodiversity (NPS-IB).

The assessment considers potential effects on indigenous vegetation, Significant Natural Areas (SNAs), native fauna (including birds, lizards and bats), habitat connectivity, and proposed biodiversity offsets. The primary ecological values identified include:

- Indigenous scrub and regenerating vegetation.
- Areas within and adjacent to Significant Natural Areas (SNAs).
- Habitat for indigenous bird species.
- Potential habitat for native lizards and long-tailed bats.
- Ecological connectivity provided by remnant and regenerating vegetation.

While both parties acknowledge these ecological values, the Board reaches different conclusions in several important respects.

Key points of disagreement:

Indigenous Vegetation: The most significant disagreement relates to the extent and significance of indigenous vegetation that will be removed. We consider the assessment inadequately quantifies vegetation loss, and underestimates the ecological value of regenerating indigenous vegetation which contributes to habitat provision, ecological connectivity and biodiversity restoration. BlueGreen maintains that this vegetation is generally young, planted, and of relatively low ecological significance, and that the proposed clearance has been accurately quantified.

Native Lizards: Potential effects on lizards remain one of the most significant unresolved ecological issues. We consider the lizard surveys, relocation methodology and management plan to be incomplete, citing insufficient survey effort, uncertainty regarding population estimates, inadequate assessment of release sites, and limited long-term monitoring. BlueGreen considers the proposed mitigation appropriate and relies on specialist herpetological advice to support its conclusions.

We consider that long-term habitat quality and ecological connectivity are likely to be more important to population viability than relocation alone.

Long-tailed Bats: The Board recommends additional acoustic bat surveys due to the presence of suitable roosting habitat and regional records of long-tailed bats. BlueGreen considers further surveys unnecessary, concluding that there is insufficient evidence that bats occupy the site.

Native Birds: There is comparatively little disagreement regarding bird management. Both parties generally agree that pre-clearance nest inspections and appropriate construction timing can adequately manage effects on indigenous bird species.

Biodiversity Offsets: Both parties support the use of ecological offsets but disagree on whether the proposed offset ratio is sufficient to compensate for vegetation loss. The Board consider the proposed offset calculations insufficiently justified, while BlueGreen considers them appropriate and consistent with previous developments.

Assessment Limitations: Our principal concern is not necessarily that the ecological effects are unacceptable, but that the ecological assessment does not provide sufficient information to confidently assess those effects.

Our review has identified several perceived limitations, including:

- incomplete quantification of indigenous vegetation loss;
- reliance on assumptions where additional field surveys could be undertaken;
- insufficient justification for proposed biodiversity offsets;
- uncertainty regarding the effectiveness of lizard mitigation measures;
- limited evidence supporting the conclusion that ecological effects will be no more than minor.

BlueGreen disagrees with these conclusions, maintaining that the ecological investigations are proportionate to the site's ecological values and that additional surveys would not materially change the assessment.

Our review demonstrates a clear difference in professional opinion regarding the robustness of the ecological assessment, rather than fundamental disagreement about ecological principles. The Board's approach is precautionary, advocating for additional ecological information before concluding that adverse effects have been appropriately managed. In contrast, BlueGreen considers the existing assessment sufficient and argues that the ecological values of the site have been overstated.

The principal unresolved issues remain:

- the extent and ecological significance of indigenous vegetation loss;
- the adequacy of surveys for lizards and potential bat habitat;
- the justification for biodiversity offset calculations;
- whether the proposed mitigation and management plans are sufficiently robust to achieve no net loss of indigenous biodiversity.

Overall, while ecological mitigation has been proposed, uncertainty remains regarding whether the available ecological information is sufficiently comprehensive to fully support the assessment of environmental effects and demonstrate compliance with applicable biodiversity policy requirements.

Board recommendations:

- Apply the precautionary principle where ecological uncertainty remains

- Undertake further ecological investigation where significant information gaps have been identified
- Strengthen long-term protection and monitoring of indigenous lizards and their habitat
- Require ecological monitoring, adaptive management and independent review throughout project implementation

Significant Natural Areas

The development site includes three Significant Natural Areas (SNAs), protecting riparian margins, ecological connectivity and locally rare native forest remnants. The Board is of the view that the strongest possible protection must be accorded to these ecologically significant areas.

Board recommendations:

- Double the planned offset planting along riparian margins (SNA 027) to protect stream banks from erosion, reduce sediment load and protect and enhance indigenous freshwater species including giant kōkopu, inanga, longfin eel and redfin bully.
- Double the planned offset planting around SNA029 and SNA 225, both containing significant indigenous forest remnants protected under QEII covenants.
- Protect SNA 029, a privately owned block comprising rare tall canopy indigenous forest, with predator-proof fencing
- Place restrictions on cat ownership across the whole planned subdivision

Wetlands and Freshwater Biodiversity

Freshwater ecosystems deserve greater emphasis throughout the assessment.

The streams, wetlands and riparian habitats associated with the development support indigenous fish, aquatic invertebrates and ecological processes that extend well beyond the site itself.

The Board is particularly concerned about:

- sediment entering streams during prolonged earthworks;
- stream realignment reducing habitat complexity;
- culverts affecting fish passage;
- impacts on aquatic invertebrates through increased fine sediment;
- cumulative degradation of freshwater habitat.

The application states:

The health and wellbeing of waterbodies and freshwater ecosystems has been prioritised. Protection and enhancement measures, including buffers, planting and ongoing management and protection, and the design and construction of stormwater infrastructure will ensure the continuous health and well-being of the natural watercourses and wetlands within the site

[Assessment against 13.4 National Policy Statement for Freshwater Management. P.117]

However, we consider the objective should not simply be avoiding significant adverse effects, but achieving measurable improvements in freshwater ecosystem health.

Board Recommendations:

- Strengthen protection and restoration of wetlands and indigenous vegetation
- Requiring measurable improvement in freshwater ecosystem health, including fish passage and aquatic habitat
- Increase riparian buffer widths
- Design all stream crossings for full fish passage
- Monitor freshwater fish and macroinvertebrates

Ecological Connectivity and Downstream Effects

The Board believes insufficient attention has been given to downstream cumulative effects of the proposed subdivision development. Sediment generated during construction has the potential to move through the Kakaho and Taupō streams into the ecologically significant Taupō wetlands complex, Pāuatahanui Inlet and wider Porirua Harbour ecosystem.

Within the Pāuatahanui Inlet are four protected areas administered by the Department of Conservation:

- Pāuatahanui Wildlife Reserve
- Pāuatahanui Wildlife Refuge
- Horokiwi Wildlife Reserve
- Duck Creek Scenic Reserve

These areas, and the whole Inlet complex support nationally important estuarine ecosystems including saltmarsh, seagrass meadows, mudflats, shellfish beds, estuarine fish, aquatic invertebrates, marine algae and important feeding habitat for indigenous birds. Even relatively small increases in sediment can reduce water clarity, smother shellfish and benthic communities, degrade seagrass habitat and diminish ecosystem function.

The Board is not yet satisfied that the applicant has paid sufficient attention to the long-term ecological resilience of the planned subdivision development and the receiving environments it will feed into. Ecological mitigation should be designed to remain effective under future climatic conditions. Given the rapid pace of climate change we are witnessing, we question whether a 15-year consent period adequately reflects current environmental uncertainty. Either a reduced consent period or mandatory five-year ecological reviews would better enable adaptive management should monitoring identify unforeseen adverse effects

Board Recommendations:

- That cumulative sediment effects across the wider catchment be explicitly assessed, mitigation measures applied, and downstream monitoring continue throughout the entire construction period
- Encourage nature-positive urban design that delivers measurable biodiversity gain and long-term ecological resilience.
- Require either a maximum five-year implementation period or mandatory independent ecological reviews at five-year intervals throughout implementation, to enable adaptive management if monitoring identifies unforeseen adverse effects or ecological outcomes differ from those predicted.

Conclusion

The Wellington Conservation Board supports development that is environmentally responsible, resilient and capable of delivering lasting benefits for both people and nature. While the Board acknowledges the work undertaken by the applicant, it is not yet satisfied that the current ecological evidence provides sufficient confidence that indigenous biodiversity, freshwater ecosystems and ecological connectivity will be protected and enhanced over the long term. The Board therefore encourages the Panel to strengthen the ecological conditions of approval to ensure measurable biodiversity gains and the protection of related freshwater ecosystems and wider catchment.

Sally Lee
Co-Chair, Wellington Conservation Board



Thank you for your comments