

16 October 2026

Attn: Mt Welcome, Pukerua Bay Expert Panel

Mt Welcome, Pukerua Bay – Comments in response to Minute 21

Tēnā koutou,

Thank you for the opportunity to provide further comments on the Mt Welcome, Pukerua Bay Application.

Te Rūnanga o Toa Rangatira (Te Rūnanga) is the mandated iwi authority for Ngāti Toa Rangatira. Te Rūnanga holds responsibilities for protecting and enhancing the mana of Ngāti Toa across political, economic, social and environmental spheres.

In relation to Te Ao Tūroa, the objective of Ngāti Toa Rangatira is to nurture a resilient environment to sustain future generations through reclaimed connection and mātauranga to natural resources, empowering kaitiaki who are leaders and co-managers of our natural environment, our commitment to environmental sustainability and our ability to adapt to the impacts of climate change.

Previous Engagement

Te Rūnanga have been engaged and provided comments on the project both prior to and following lodgment of the application under the Fast-Track Approvals Act 2024. This engagement has included multiple hui, site visits, and written correspondence. As part of the application, we provided a letter dated 5 November 2025 and a Cultural Values Assessment (CVA).

Following lodgment, engagement has continued, including a hui to discuss outstanding matters. Te Rūnanga has also attended the Panel Convener conference, the project overview conference and expert conferencing on outstanding issues.

Te Rūnanga understands that following this conferencing, the applicant has provided revised conditions as requested by the Panel as well as alternative proposals for stormwater management and ecological offsetting.

Alternative Proposal

Te Rūnanga understands that the alternative proposal separates stormwater management, and ecological offsetting by removing wetland and stream remediation

areas from stormwater detention ponds. To account for the lost remediation area from the original proposal, additional stream remediation and ecological offsetting have been identified in the Kakaho east catchment.

Te Rūnanga had previously expressed concerns about the original approach of combining stormwater management and ecological offsetting as this approach undermined the integrity and mauri of natural waterways through potential loss or long-term modification of existing wetland systems. Any offsetting approach must be robust, transparent, and underpinned by commitment to uphold the protection and restoration of Te Awarua o Porirua.

Te Rūnanga acknowledges that the alternative proposal represents an improvement on the original stormwater and ecological offsetting approach. In particular, we support the separation of stormwater infrastructure from ecological offsetting and restoration areas, as this better recognises the distinct functions and values of these systems.

Te Rūnanga considers that the alternative proposal does somewhat address the issues we previously raised. However, we want to ensure that the loss of streams through reclamation is avoided and that the life force of awa and wetlands are cherished and enhanced. We remain uncertain that the proposed offset approach will achieve the intended ecological outcomes, particularly in terms of protecting downstream environments and water quality.

While we recognise that the proposed offsetting and enhancement works would contribute to environmental outcomes within the wider catchment, we consider that opportunities to enhance and restore values within the affected Taupō and Waimāpihi catchments should be explored further.

As kaitiaki within a cultural landscape of considerable significance to Ngāti Toa Rangatira, we consider that a cautious and rigorous assessment of these matters is warranted for this proposal. Overall, the proposed approach should meet the objectives of Te Wai Ora o Parirua – Porirua Harbour Accord. Te Rūnanga considers that a robust approach is required to ensure the mauri of all water bodies across the site, including the receiving environment, are protected, and that stormwater management aligns with cultural values and enables Ngāti Toa Rangatira to uphold our responsibilities as kaitiaki.

Te Rūnanga has previously encouraged the applicant to incorporate water conservation into the proposal including rainwater harvesting, to preserve the mauri of the wai, and to

reduce pressure on freshwater resources. Therefore, we support the proposal to introduce rainwater tanks for every residential lot. From the perspective of Ngāti Toa Rangatira, retaining and reusing water can reduce unnecessary discharge to waterways, protecting the mauri of freshwater systems.

We consider that further work is required to provide confidence that the health and wellbeing of the catchment and receiving environments will be maintained and enhanced over time. While we recognise the improvements proposed through the alternative stormwater approach, we note that Greater Wellington Regional Council has identified a number of outstanding technical matters relating to the effectiveness, design, maintenance and long-term performance of the stormwater management system. We are therefore not entirely satisfied that the proposal has adequately demonstrated how stream health and cumulative effects across the wider catchment will be managed, or how it will contribute to the protection and restoration of Te Awarua o Porirua.

While the proposed changes are positive, we remain to be entirely convinced that the proposed mitigation and offsetting package will deliver the anticipated environmental and ecological outcomes over the long term. Ongoing monitoring and adaptive management will be important to ensure that restoration gains are realised and maintained into the future.

Te Rūnanga also previously supported the positions outlined by Tiaki Wai, Greater Wellington Regional Council and Porirua City Council on the application. Following review of Greater Wellington's comments on the alternative proposal, Te Rūnanga continues to support the matters raised by those organisations and considers that the outstanding technical issues identified should be satisfactorily resolved before confidence can be placed in the long-term performance of the proposed stormwater management system.

Proposed roundabout and piping of Taupō Stream

Our concern regarding the proposed reclamation and culverting of Taupō Stream remains. Te Rūnanga o Toa Rangatira continues to oppose the culverting and permanent reclamation of Taupō Stream. The values of the awa include mahinga kai, puna raranga, rongoā, wai māori, wai ora, wāhi tūpuna and wāhi maumahara. These values signal the importance of protecting and enhancing the health of the stream to ensure that ongoing generations of Ngāti Toa Rangatira may connect with the awa.

While Te Rūnanga acknowledges the improvements that have been made to other aspects of the proposal, including stormwater management and ecological offsetting,

those changes do not resolve our concerns regarding the permanent loss of a section of Taupō Stream.

Our strong preference is for alterations to waterways to be avoided wherever possible, unless any changes provide clear ecological benefits, such as restoring them to their natural state or enhancing habitat and water quality. From the perspective of Ngāti Toa Rangatira, the avoidance of adverse effects on waterways should remain the primary objective, with mitigation and offsetting considered only where avoidance is not reasonably achievable.

The intrinsic values of our waterways must be recognised, protected, and enhanced, as they are taonga. Waterways are also a source of mauri and therefore impacts on the Taupō Stream as proposed through this development have the potential to significantly affect the health and wellbeing of the surrounding environment and the whānau of Ngāti Toa Rangatira.

Conclusion

Te Rūnanga o Toa Rangatira requests that the Panel carefully consider the concerns raised in our comments regarding the adverse effects of this proposal on cultural, freshwater, and environmental values. While we acknowledge the work undertaken by the Applicant to date, including positive changes to the stormwater management and ecological offsetting approach, a number of important matters remain unresolved. Concerns remain regarding the culverting of Taupō Stream, the long term performance of the proposed stormwater management system, and whether the proposed mitigation and offsetting package will achieve the anticipated ecological outcomes over time. Collectively, these matters mean that Te Rūnanga does not yet have sufficient confidence that the proposal will protect and enhance the values of the site and wider catchment over the long term.

As kaitiaki, it is our view that development of this scale should not simply minimise adverse effects but should deliver outcomes that contribute positively to the health and wellbeing of te taiao. We expect modern developments to reflect best practice environmental design, protect and enhance the values of the landscape, and leave a positive legacy for future generations. This includes recognising the intrinsic values of waterways and wetlands, protecting the mauri of these environments, and ensuring that any mitigation or offsetting measures are robust, transparent, and capable of delivering enduring outcomes.

Ngā mihi nui,

Ella Jaspers

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**TE RŪNANGA O
TOA RANGATIRA**