

BEFORE THE FAST-TRACK PANEL

IN THE MATTER of the Fast-track Approvals Act 2024 (**FTAA**)

AND

IN THE MATTER of an application by Pukerua Property Group Limited
Partnership under section 42 of the FTAA for the Mt
Welcome, Pukerua Bay, Porirua application

APPLICATION NO. FTAA-2603-1181

**MEMORANDUM FROM THE DIRECTOR-GENERAL OF CONSERVATION
RESPONDING TO MINUTE 21 OF THE PANEL**

16 October 2026

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Introduction

1. This memorandum has been prepared on behalf of the Director-General of Conservation (**D-G**) by the Department of Conservation (DOC). It responds to Minute 21 of the Panel dated 6 October 2026 in respect of the Mt Welcome, Pukerua Bay application (the “Minute”).
2. The Minute, in paragraph [8] refers to the material provided by the applicant relating to its alternative proposal and invites all parties who have made comment on the issues the alternative proposal seeks to address to provide further comment on it (including the revised conditions the applicant will supply, as above). The Panel is particularly interested in the extent to which the alternative proposal addresses, or does not address, previously expressed concerns. Such further comments should be in the hands of the EPA by noon on 16 October.
3. Comments from DOC’s ecological and planning experts are attached as:
 - a) Attachment 1: Comments on Regional consent conditions;
 - b) Attachment 2: Comments from Ms Hooker regarding terrestrial ecology; and
 - c) Attachment 3: Comments from Dr Collins regarding freshwater ecology.
4. In summary:
 - a) DOC supports the approach that retention wetlands A, B, C and E are reconfigured and managed as stormwater detention ponds and are not also relied on to provide the wetland remediation, wetland offsetting and stream-habitat functions identified in the lodged proposal. Under the alternative proposal those ecological functions would therefore be provided in separate, expressly protected areas, and that an additional area of land is required.
 - b) The alternative proposal still excludes wetlands that have met the pastoral exclusion test. The offset proposal should include these areas (5,000m²) and the total area that requires offsetting is 27,220m².
 - c) The offset in the alternative proposal is stated as 24,600m², but only approximately 10,000 m² is new wetland to be created while the remainder is existing wetlands to be maintained and improved. Even using a 1:1 ration, the 10,000m² does not fully remedy the loss of 27,220m² wetland

environments lost, leaving a shortfall of 17,220 m² of wetland that will be removed and not replaced by new wetland created.

- d) A 1.1:1 offsetting ratio is recommended. This results in the total amount of wetland area to be created to be 29,942m².
- e) Dr Collins (Attachment 3) however, notes that the shallow (~100 mm) stormwater detention ponds pose water quality risks by being prone to high water temperatures and low dissolved oxygen, discharging to downstream environments. These ponds are also likely to provide ideal habitat for insect species such as mosquitoes and midges.
- f) There is some suitable fish habitat upstream of stormwater detention pond E, thus it is appropriate that fish passage be provided for. However, it is a concern that the habitat within stormwater pond E may be unsuitable for fish, given the shallow wet basin design. This is not preferred.
- g) Alternatively, if the stormwater basins are maintained as dry basins/flood plains that hold stormwater during periods of rain and retain associated stream channels then fish passage is again appropriate at all detention ponds.
- h) The Complex Freshwater Fisheries Activities application has not been updated/resubmitted to reflect the alternative proposal for management of stormwater.
- i) Comments on the Draft regional council conditions are provided in Attachment 1 with DOC's comments indicated in track-changes in green, and include:
 - (i) Remediation, offsetting or compensation for effects on rivers and natural inland wetlands - The conditions need to specify the exact SEV score required to offset the loss of stream/river and the specified timeframe for when this will be achieved i.e. within 5 years;
 - (ii) Monitoring of remediation, offsetting or compensation for effects on rivers and natural inland wetlands should be undertaken by a freshwater ecologist;

- (iii) DOC should be provided with a copy of monitoring of remediation, offsetting or compensation for effects on rivers and natural inland wetlands;
- (iv) In the scenario where remediation and offsetting is not consistent with the performance standards, DOC should be provided the opportunity to comment and review the proposed amendments to ensure the performance targets are met;
- (v) If compensation is proposed, there will need to be conditions that outline how residual adverse effects will be compensated. At the moment, it is unclear whether compensation is proposed.
- (vi) Eco-Hydrological Management, Offsetting, and Monitoring Plan (EHMP) should be prepared by a suitably qualified freshwater ecologist;
- (vii) The objective should be clear that the EHMP is purposed for managing residual adverse effects. This would follow the steps of the effects management hierarchy;
- (viii) DOC considers the Consent Holder should provide DOC with an opportunity to comment on the EHMP prior to certification by Council;
- (ix) Freshwater fish - Any handling or management of fish should be carried out by a SQEP freshwater ecologist; and
- (x) Stream works Construction Management Plan - DOC opposes the freshwater fish management measures being designed by a SQEP in earthworks management. The fish management requirements need to be designed and prepared by a SQEP with expertise in freshwater ecology



Linda Kirk
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