

Attachment 2: Comments from Ms Hooker regarding terrestrial ecology

Before the Fast-track Panel

Under: The Fast-track Approvals Act 2024

In the matter of: FTAA-2603-1181 Mount Welcome

Statement of advice Name: Tayla Hooker

Area of expertise: Terrestrial ecology flora

Relationship to DOC/Role: Technical advisor flora and ecosystems

Date: 16/10/26

Introduction

1. My full name is Tayla Jane Hooker.
2. I am providing ecological advice to the Director-General of Conservation in relation to the fast-track application for the Pukekura Property Group Limited Partnership application for the development of a 949 lot subdivision near Pukerua bay referred to as Mt Welcome.

Instruction

I have been instructed to/or am providing expert advice on behalf of DOC in relation to the alternative proposal for management of stormwater and separation from offsetting ecological effects. **Qualification and Experience**

3. I have a bachelor's degree in Environmental Science (Wildlife and Conservation Biology) from Deakin University, Melbourne, Australia.
4. I have been employed by the Department of Conservation since 2020. For five years I was employed as Biodiversity Ranger based in Twizel/Te Manahuna, working closely with managing and monitoring threatened plant populations within the area. For the past year I have been employed as a Technical Advisor for flora and ecosystems, where I facilitate threatened plant and ecosystem work over the Lower North island.

5. During this time, I have surveyed 18 different pastoral leases in the Mackenzie Basin for their inherent biodiversity values as a part of the Crown Pastoral Lease Act (CPLA).
6. I have provided evidence and attended a hearing for Balmoral solar array within the Mackenzie basin. Within the Lower North Island, I have provided advice for various fast track applications.
7. I assist in the monitoring and management of New Zealand's threatened plant flora and their associated ecosystems within the districts of Ngāmotu (New Plymouth), Whanganui, Te-Papa-i-Oea (Palmerston North), Te Whanganui-a-Tara (Wellington), Whakaoriori (Masterton) and Ahuriri (Napier).

Code of conduct

8. Whilst it is acknowledged this is not an Environment Court Proceeding; I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in the preparation of this advice. Unless I state otherwise, this assessment is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Comments

9. The proposed stormwater ponds are engineered stormwater management devices that are a necessary component of the subdivisions stormwater infrastructure that are subject to multiple performance criteria as outlined in section 6.3 of the stormwater management plan. As such, they are deliberately constructed for stormwater management purposes rather than occurring as natural wetland systems.
10. The alternative proposal tries to address some of the key functions of wetlands that a stormwater management system might otherwise not address, being the removal of impermeable surface and planted bottoms. Other functions are more difficult to address, these are:
 - a) Sediment and nutrient accumulation resulting in carbon sequestration:
Carbon sequestration is one of the key ecological functions that

wetlands provide. Whilst the alternative proposal outlines that sediment removal would not be required until 35 – 85 years^[1], it is still required to be removed at some point and this ultimately results in the release of the stored carbon and thereby is in part a reversal of its ecological function.

b) fluctuating water levels: Natural wetlands undergo seasonal water level fluctuations that create a variety of ecological niches, this is different to stormwater management systems that otherwise have a consistent water level outside of brief increases due to stormwater events.^[2]

11. Given these limitations and the stormwater retention ponds the stormwater retention designs should not be regarded as retention of natural wetland extent, which is the basis of the alternative assessment provided the applicant. I agree with this assumption.

12. This would point to a requirement to then apply the alternative proposal as supplied by Dr Keesing, however the Dr Keesing's summary still excludes those wetlands that have met the pastoral exclusion test. A matter of which has been outlined in Ms Dixon's and my respective s53 comments. Conclusively that the offset proposal should include these areas and the total wetland area that requires offsetting is 27,220m² (this incorporates the additional 5,000m² of these pastoral exclusion areas). The use of the pastoral exclusion rule for the distinct purposes to allow for continued grazing is further reinforced in clause 3.21 of the NPS-FM, that states a natural wetland is not:

“e) a wetland that:

- i. Is within an area of pasture used for grazing; and
- ii. Has vegetation cover comprising more than 50% exotic pasture species (as identified in the *National List of Exotic Pasture Species using the Pasture Exclusion Assessment Methodology*)”

13. As the area will no longer be used for grazing those wetlands that would otherwise meet wetland delineation protocols outside of the pastoral exclusion rule should be incorporated into the wetland offset.

14. A 27,220m² offset is then an offset ratio of 1:1 and is the absolute minimum area of offset required. The amended Regional Policy Statement for the Wellington Region states that:

”Applications for biodiversity offsetting or aquatic offsetting of adverse effects on ecosystems and species that meet the criteria in Policy24A(b)^[3] can on be considered if at least a net gain, and preferably a 10% net gain or greater, in the *indigenous biodiversity* values affected can be reasonably demonstrated.”^[4]

15. It is preferable as is consistent with principle 3 of the NPSFM for Aquatic offsetting to demonstrate a net gain when offsetting aquatic biodiversity loss. This statement then leads to a requirement of a 1.1:1 ratio resulting in the total amount of wetland area to be created to be 29,942m².

16. It is therefore my opinion that a larger area than 22, 211m² is required to be offset and the proposed 24,600m² of offset (proposed as existing wetland enhancement and some creation) does not remedy the loss of wetland environments.

17. The current memorandum sets out ecological enhancement of existing wetlands as 12,500m² within the footprint and the creation of wetland in the Kakaho East valley floor of approximately 10,000m² with additional enhancement of 2100m² of existing wetland. If 10,000m² of wetland is proposed to be created then there will still be a net loss of wetland extent of 17,220m² (this is if the wetlands previously excluded due to pasture exemption are to also be accounted for). This is a significant loss in wetland extent and functioning.

18. Given that the Wellington RPS states a 10% gain is preferable, it is therefore best practice to offset 29,942m² in area for a no net loss of extent to occur. An additional 19,942m² of wetland would need to be created to result in a confident no net loss and instead a net gain of wetland extent.

19. In my opinion the amended offset proposal still results in significant adverse impacts on wetland values.

References

1. Greater Wellington Regional Council. (2025). *Regional Policy Statement for the Wellington Region: Change 1 appeals version (September 2025)*. Wellington, New Zealand: Greater Wellington Regional Council.
2. Ministry for the Environment. (2020). *National Policy Statement for Freshwater Management 2020*. Wellington, New Zealand: Ministry for the Environment. <https://environment.govt.nz/publications/national-policy-statement-for-freshwater-management-2020/>
3. Rooney, R.C., Foote, L., Krogman, N., Pattison, J.K., Wilson, M.J. & Bayley, S.E. (2015). *Replacing natural wetlands with stormwater management facilities: biophysical and perceived social values*. Water Research, 73, 17-28. DOI: 10.1016/j.watres.2014.12.035
^[1] Referred to in Appendix A1 – Alternative-Stormwater-Strategy as a result of the PDP memo dated 6 August 2026 (Appendix F to Applicant response to s53 comments).
^[2] Rooney, R.C., Foote, L., Krogman, N., Pattison, J.K., Wilson, M.J. & Bayley, S.E. (2015). *Replacing natural wetlands with stormwater management facilities: biophysical and perceived social values*. Water Research, 73, 17-28. DOI: 10.1016/j.watres.2014.12.035
^[3] Policy24A(b) refers to the criterion of which an area that is defined as significant and therefore requiring offset.
^[4] Appendix 1A, page 305 of the 'Regional Policy Statement for the Wellington Region: Proposed Change 1 and Variation 1 – Appeals Version.' July 2025.