

28 July 2026

Attn: Mt Welcome, Pukerua Bay Expert Panel

Mt Welcome, Pukerua Bay – Comments

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.

In order to undertake this development, we understand that Pukerua Property Group LP has applied for a number of consents from both Porirua City Council and Greater Wellington Regional Council, as well as Wildlife Approvals, an Archaeological Authority and a complex freshwater fisheries approval.

Previous Engagement

The Applicant has engaged with Te Rūnanga both prior to and following lodgment of the application. 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 both the Panel Convener conference and the project overview conference. In addition, ongoing discussions with Greater Wellington Regional Council, Porirua City Council and Tiaki Wai have supported an aligned understanding of the project.

Outstanding Issues

Stormwater management

In our earlier letter, provided with the application, Te Rūnanga outlined our position on the proposed stormwater management for the development. At this stage we remain concerned that the proposed stormwater management relies heavily on engineered solutions that repurpose our awa and wetlands, including the use of constructed wetlands as stormwater detention devices. This approach risks undermining the integrity and mauri of natural waterways and wetlands, including through potential loss or long-term modification of existing wetland systems. In its current state, we do not believe that the proposal adequately addresses hydrological control.

Te Rūnanga is also concerned that the development is likely to increase runoff volumes and may exacerbate existing erosion and sedimentation issues within the catchment. This outcome is not consistent with the objectives of Te Wai Ora o Parirua – Porirua Harbour Accord. In addition, uncertainties in hydrological modelling, arising from limited baseline monitoring, reduce confidence that adverse effects have been fully understood or appropriately mitigated. Te Rūnanga considers that further modelling and a more robust approach are required to ensure the mauri of all water bodies across the site, including the receiving environment, are protected, and that stormwater management aligns with hydrological control principles and enables Ngāti Toa Rangatira to uphold our responsibilities as kaitiaki.

One of the principles we articulated in our earlier letter was as follows: water conservation, including water harvesting, to preserve the resource and its mauri. At this stage, we remain concerned that insufficient weight has been given to water conservation and rainwater harvesting as fundamental components of the stormwater management approach. From the perspective of Ngāti Toa Rangatira, retaining and reusing water can reduce unnecessary discharge to waterways, protecting the mauri of freshwater systems.

Beyond its environmental benefits, Te Rūnanga considers that rainwater harvesting can contribute to greater community resilience and emergency preparedness. As climate-related events become more frequent and pressures on public infrastructure increase, localised water storage and reuse is integral to help build resilience, reduce demand on regional infrastructure networks and provide an alternative water source during emergencies or water storages. We consider that these broader benefits have not been adequately explored through the current proposal. Greater emphasis should be placed on water retention, harvesting, and reuse as part of a best practicable approach to stormwater management.

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. In particular, we are not satisfied that the proposal has adequately demonstrated how increased runoff volumes, stream health, erosion risks, and cumulative effects across the wider catchment will be managed, or how the development will contribute to the protection and restoration of Te Awarua o Porirua. We consider that a more robust and precautionary approach is required, including greater emphasis on water retention, water harvesting, reuse, and hydrological control measures that better reflect the principle of kaitiakitanga.

Until this occurs, Te Rūnanga is not satisfied that the proposal aligns with hydrological control principles, protects the mauri of the receiving environment, or is consistent with the objectives of Te Wai Ora o Porirua – Porirua Harbour Accord. Consequently, we do not consider that the proposal currently enables Ngāti Toa Rangatira to effectively uphold our role as kaitiaki.

Proposed roundabout and piping of Taupō Stream

The proposal to culvert and permanently reclaim 110 meters of Taupō Stream to provide access to the development site continues to be a significant concern for Te Rūnanga o Toa Rangatira. We have met with the applicant, alongside Porirua City Council and Waka Kotahi, to discuss alternative access designs that could avoid the reclamation of Taupō Stream. So far, no progress has been made to amend the proposed design and address this issue.

Te Rūnanga o Toa Rangatira opposes the culverting and permanent reclamation of Taupō Stream as this would significantly impact the mauri and values of the awa including 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 and practice traditions such as gathering kai and harvesting for rongoā and raranga. This requires maintaining the ability to access the stream and enhancing the water quality and habitat for mahinga kai species.

Te Rūnanga is also concerned that the ecological assessment for the application states that this culvert is not required to be compliant with the fish passage regulations of National Environmental Standards for Freshwater due to existing downstream barriers to fish passage. This contrasts with the view of Te Rūnanga. Existing barriers should not limit the protections of the stream and its value as a mahinga kai. Regardless of existing

fish passage barriers, the aspiration of Te Rūnanga is to enhance the health of the stream through improved fish passage and habitat to ensure that values and mauri of the stream are upheld and sustained for future generations.

The value of Taupō Stream is further emphasised through its connection with the Te Awarua o Porirua catchment. Te Awarua o Porirua is recognized as a Statutory Acknowledgement Area under the Ngāti Toa Rangatira Claims Settlement Act 2014. The interconnectedness of this environment must be recognized through the application as the health of individual streams also impacts the wider catchment and ecosystem.

Te Rūnanga acknowledges the applicant's further assessment of alternative access arrangements and the potential effects of stream realignment on the adjacent Significant Natural Area (SNA027). However, our concern regarding the proposed reclamation and culverting of Taupō Stream remains. The cultural significance of the awa is not determined solely by its current ecological condition, fish passage status, or visibility. Ngāti Toa continues to view Taupō Stream as part of the wider Te Awarua o Porirua catchment, and its restoration and enhancement remain important aspirations despite the degradation and modifications that have occurred over time. The current condition of the stream should not be used as justification for further loss or modification of the awa and its values.

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. The intrinsic values of our waterways must be recognized, 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.

Offsetting Proposal

Offsetting approach

As discussed above, Te Rūnanga o Toa Rangatira seeks that the loss of streams through reclamation is avoided and that the life force of awa and wetland is cherished and enhanced. We are concerned that there remains insufficient evidence to provide confidence that the proposed offset approach will achieve the intended ecological outcomes. In addition, we are very concerned about multiple experts' identification of gaps in baseline information, modelling, and assessment of hydrological, water quality,

and ecological effects. We are also further concerned by how these effects will be managed over the long construction period and beyond.

The assessment of the proposed offsetting package requires consideration of several complex and interconnected matters. We have not found it easy to work through the implications of the proposal. The issues identified by technical reviewers for Greater Wellington Regional Council and Tiaki Wai contribute to our concern that there is not yet sufficient certainty regarding the delivery and long-term maintenance of the proposed ecological outcomes. These include:

- the limited assessment of the ecological quality of the proposed retention wetlands intended to function as offsets
- uncertainty regarding downstream water quality and hydrological effects
- questions regarding the methodology used to calculate offset values
- limited fish survey information, and
- a lack of detail regarding the management, monitoring and mitigation measures required to achieve the proposed ecological outcomes.

These matters make it difficult to assess the likely effectiveness of the proposed offset approach. We believe it is important that any offsetting approach is transparent, supported by robust evidence, and consistent with established good practice, including appropriate consideration of baseline conditions and time lags between environmental losses and offset gains. 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.

Combining stormwater management and ecological offsetting

Te Rūnanga o Toa Rangatira remains concerned about the fundamental approach to combining ecological offsetting with stormwater management. We do not support the proposed use of streams and wetlands as stormwater management devices and consider the proposed 'in-line' stormwater wetland approach inappropriate. We support the position outlined by Tiaki Wai that the issue of separating stormwater management functions from ecological mitigation requires further resolution before consent is granted. We are also mindful of the concerns raised by Tiaki Wai as the entity that will ultimately assume responsibility for ownership and maintenance of these assets. The indication that substantial amendments may be required before vesting could be supported highlights the need for greater confidence regarding the long-term operation and management of the proposal.

As outlined above, we consider that wetland-based stormwater management should occur through ‘off-line’ systems rather than through modifications to natural streams and wetlands. Even if the ‘on-line’ approach was to be consented, we consider that the concerns identified by Greater Wellington experts must be fully addressed and resolved. We note these include uncertainty about the long-term water levels within the proposed wetlands, the ability to establish and maintain the intended plant communities, the implications of upstream sediment inputs filling the wetlands, the lack of clarity about future maintenance requirements, and whether the ecological values relied upon to deliver offset outcomes will be able to endure.

Te Rūnanga o Toa Rangatira remains committed to the position that this combined offsetting-stormwater management approach is inconsistent with upholding the intrinsic values of our waterways. As kaitiaki, we strongly seek that this aspect of the application is substantively reconsidered. Any subsequent offsetting approach must then be robust, and transparent and underpinned by commitment to upholding the protection and restoration of Te Awarua o Porirua.

Protection of Archaeological Sites and Recognition of the Cultural Landscape

Te Rūnanga o Toa Rangatira recognizes the work undertaken by the Applicant to identify archaeological values within the site and the preparation of the Archaeological Management Plan. We support the proposed monitoring, discovery protocols, and the ongoing involvement of Ngāti Toa Rangatira in the management of any archaeological material encountered during earthworks.

As discussed in the Archaeological Assessment of Effects Addendum, recorded archaeological sites are present within the Mt Welcome development area. Ngāti Toa Rangatira exercises kaitiaki over all archaeological sites within the Porirua district, regardless of whether the origin or history of those sites is fully understood. While we acknowledge the measures proposed to manage archaeological effects, Te Rūnanga notes that, due to the scale of development and associated earthworks, opportunities to retain and protect identified archaeological features in situ are limited.

Te Rūnanga also notes the significance of the existing woolshed to a number of Ngāti Toa whānau. As identified in the Cultural Values Assessment, the woolshed carries the names, stories, and memories of whānau who were involved in shearing gangs at Mt Welcome Station. While Te Rūnanga acknowledges that the structure itself may not be retained as part of the development, we consider it important that any features, markings, or material of cultural and historical significance associated with the woolshed are not

removed, destroyed, or disposed of without engagement with Ngāti Toa. At this stage, discussions with whānau are ongoing regarding appropriate opportunities to record, preserve, or otherwise acknowledge this history before demolition occurs.

Te Rūnanga o Toa Rangatira also wishes to emphasise that the significance of Mt Welcome extends beyond recorded archaeological sites. The area forms part of the wider Pukerua and Te Awarua o Porirua cultural landscape, with connections to ancestral occupation, cultivation, travel routes, waterways and mahinga kai. We encourage the Panel to remain mindful of these broader cultural values in its assessment of the proposal.

Conclusion

Te Rūnanga o Toa Rangatira requests that the Panel adopt a precautionary approach and 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, significant concerns remain regarding the proposed stormwater management approach, the culverting of Taupō Stream, and the proposed offsetting package. Collectively, these matters mean that we do not yet have sufficient confidence that the proposal will protect and enhance the values of the site and wider catchment, or that the anticipated ecological outcomes will be achieved 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.

Te Rūnanga o Toa Rangatira therefore asks the Panel to carefully consider whether the proposal, as currently presented will achieve these outcomes and appropriately protect and enhance the cultural, freshwater, and environmental values of the Te Awarua o Porirua Whaitua and wider catchment for future generations.

Ngā mihi nui,

Ella Jaspers

Kaitohu Tuakana Rawa Taiao Matua – Senior Advisor Resource Management

**TE RŪNANGA O
TOA RANGATIRA**