

Fast-track project name	Mt Welcome, Pukerua Bay, Porirua
Fast-track application number	FTAA-2603-1181
GW file number	FTA260348

To	The Expert Panel
Date	11 September 2026

Response to Minute 18: Comments on Ecology Report

1. This memorandum is filed on behalf of the Wellington Regional Council (Greater Wellington) in response to the invitation of the Expert Panel to provide comments on the report prepared by Dr Gary Bramley (dated 7 September 2026)¹ at paragraph [3] of Minute 18 dated 4 September 2026.
2. This memorandum sets out Greater Wellington's comments on Dr Bramley's report (the Report).

Biodiversity mitigation

3. At page 9 of the Report, mitigation is described as:

Actions taken on-site within the development footprint to reduce the immediate impacts of the project (e.g., planting native species in a degraded gully on the same farm).

4. However, the term **biodiversity mitigation** is defined in the Natural Resources Plan for the Wellington Region (NRP) as:

Mitigation is the abatement (lessening or repair) of the adverse effects of an activity, undertaken in direct response to, and at the same location as, that activity, designed and implemented in accordance with principles set out in Schedule G1.

5. A key difference between the two definitions is the spatial extent within which activities may be considered as mitigation. The Report definition states that actions taken "on site within the development footprint" may constitute mitigation, whereas the definition in the NRP requires that those actions are "at the same location" as the activity that causes the adverse effects.
6. Whether or not a mitigation is "at the same location" as an adverse effect is not determined by the location of the site boundary or development footprint. Rather it is determined by whether the mitigation is within the same location that is subject to the adverse effects of the

¹ See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0026/34892/Ecology-advice-Gary-Bramley-7-September-2026_Redacted.pdf

activity. For example, at Mt Welcome, addressing the loss of river value and extent in the Taupō catchment by enhancing river banks in the Kakaho catchment would not constitute mitigation because the mitigation is not in the same area that is affected, even though it may be on the same site and within the same development footprint.

7. Greater Wellington considers that, at least for matters that are subject to the regional plan (in this case, activities that affect rivers and wetlands), the definition of biodiversity mitigation in the NRP should be used to determine whether the actions proposed by the applicant are mitigation.

Principles for biodiversity mitigation

8. The Report states at page 10 that “considering the proposed ecological management at the site to be mitigation removes the need to demonstrate additionality”. However, the definition of biodiversity mitigation in the NRP requires that mitigation is designed and implemented in accordance with Schedule G1 of the NRP (see **Attachment 1** to this memo). This includes (under Principle 2) a requirement to demonstrate that the actions to mitigate adverse effects are additional to what would have occurred without the proposed mitigation.
9. If the Panel considers that any of the methods to address adverse effects on streams and wetlands are mitigation, Greater Wellington considers that the principles of mitigation set out in Schedule G1 of the NRP (including the need to demonstrate additionality) should apply to those methods.

Definition of offsetting

10. At page 9 of the Report, offsetting is described as:

A measurable conservation action taken to balance out a significant residual adverse effect that cannot be mitigated on-site.

11. Greater Wellington considers that significant residual adverse effects are not the correct threshold to trigger the need for offsetting. Under Policy P31 of the NRP, and the definition of *effects management hierarchy* set out in clause 3.21 of the National Policy Statement on Freshwater Management 2020 (NPS-FM), more than minor residual adverse effects are the correct threshold to trigger the need for offsetting.

Piping of the Taupō Stream

12. Dr Taylor has the following comments on the Report, as it relates to the piping of the Taupō stream:

Dr Bramley notes what has been proposed by Dr Keesing in terms of stream loss and has mixed Taupo stream loss with onsite loss; however, has not evaluated if the use of the ECR has been

undertaken as appropriate for the ratio that Dr Keesing has provided; nor has opportunity been provided to conference on this matter.

The following needs to be considered with respect to the Taupo Stream SEV:

- *Multiplier applied*
- *ECR numbers used from the various calculations and reports provided.*
- *Whether the stream effect is limited to just the 110 m of culvert or if addition reach is affected (for example erosion structures)*
- *Consideration of staging and lag.*

The impact of the above is the potential that the required offset is larger than has been proposed. Therefore, I suggest conferencing is beneficial to the project outcomes.

On property streams

13. Dr Taylor has the following comments on the Report as it relates to the effects on streams that are on the property:

More to the above, Dr Bramley has not discussed whether SEV's should be undertaken for the streams affected within the site. At present the assessment has not quantified the stream values within an SEV to arrive at a value and consideration of required offsetting for permanent loss (e.g. where to be submerged, infilled and culverted).

I also wish to comment on whether the permanent stream loss and replacement with wetlands can be considered mitigation as defined by Dr Bramley. Paraphrased but linking the points:

- *Mitigation as identified by Dr Bramley is an action that directly addresses environmental damage with the impact footprint and undertaken on site within the development footprints.*
- *Offset is calculated positive actions including outside the direct impact footprint and cannot be mitigated on site.*

The streams within the site will be lost as noted above and therefore are unable to be mitigated within the footprint of that loss therefore must be offset. No explicit calculations have been provided for this with SEV being the accepted method for such. At present there has been no SEV provided to understand the on-property streams values and required compensation for those permanent losses of extent. This matter has not been conferenced due to time constraints but had been on the agenda. I suggest this requires conferencing.

Application of SEV was on the agenda for conferencing, but conferencing never got to discuss this. Without conferencing this, we can't get to a point of agreement.

14. Dr Taylor notes that there were matters on the agenda for conferencing that were not discussed due to time constraints. The matters that were not discussed are recorded in the

Joint Witness Statement Aquatic Ecology². Greater Wellington agrees with Dr Taylor that there would be benefit in further conferencing to resolve these matters, once there is greater certainty about the resolution of outstanding issues related to stormwater management.

Residual adverse effects

15. Greater Wellington acknowledges the findings of the Report in relation to managing the adverse effects of the project on natural inland wetlands. Where the Report states, at page 8, that “offsetting is proposed at a 1:1 ratio, i.e., construction of 15,311 m² of wetland is required to achieve no loss of wetland extent”, Greater Wellington understands this to mean that the Report has concluded that wetland creation is required to achieve no loss of wetland extent. If this is the case, Greater Wellington agrees with this finding, noting that it is consistent with Policy 6 of the NPS-FM.
16. Greater Wellington disagrees with the Applicant’s position, referred to at page 8 of the Report, on the quantity of residual loss of natural inland wetland that needs to be addressed through wetland creation³. However, determining the residual loss of natural inland wetland at this stage requires the resolution of matters beyond the content of the Report, including:
 - (a) Whether or not the retention wetlands are determined to have a dual purpose for stormwater management and river/wetland ecological remediation, offsetting, or compensation;
 - (b) Whether or not the “pasture exception” is applied to approximately 5,020 m² of wetland loss that the Applicant has not accounted for.
17. In that regard, Greater Wellington agrees with the statements at the top of page 10 in the Report that “whether or not offsetting is desirable... remains a matter to be addressed” and “the outstanding residual effects of the Project once these mitigation actions have been undertaken are yet to be quantified”. Determining an appropriate package of works to offset or compensate for the residual loss of natural inland wetland extent and value (and indeed river extent and value, as pointed out by Dr Taylor above) is a matter that Greater Wellington considers needs to be resolved once the residual adverse effects of the project on freshwater ecology have been quantified, in advance of the Panel’s decision.

² See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0032/34799/Aquatic-ecology-JWS.pdf

³ Ms Dixon, at paragraph 8 of her Section 53 Comments for Greater Wellington, calculates a larger residual loss of 20,320 m² based on including the “pasture exception” wetlands. See: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0025/31966/08f.-GWRC-Appendix-5-Technical-Comments-Wetland-Ecology.pdf

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Attachment 1: Schedule G1 of the NRP

Schedule G1: Principles to be applied when proposing and considering biodiversity mitigation



This schedule details the principles that will be used to guide the development of **biodiversity mitigation** proposals. These principles will be used when assessing the adequacy of proposals for the design and implementation of **biodiversity mitigation** as part of resource consents issued under this Plan.

Any **biodiversity mitigation** proposed to manage adverse effects on biodiversity under Policies P31, P37 and P38 should be designed and implemented with regard to any current guidance or direction from central government in relation to mitigation.

Each of the following principles must be applied:

1. Adherence to the effects management hierarchy

The proposed **biodiversity mitigation** will be assessed in accordance with the effects management hierarchy set out in Policies P31, P37 and P38. Any proposal for **biodiversity mitigation** will document the appropriate measures taken to respectively avoid, minimise, or remedy any adverse effects of the activity on biodiversity.

2. Additional conservation outcomes

Any proposal for **biodiversity mitigation** will demonstrate the actions to mitigate adverse effects on biodiversity are additional to what would have occurred without the proposed mitigation, including any activities required by any associated resource consent/s.

3. Landscape context

Any proposals for **biodiversity mitigation** will:

- (a) demonstrate that the proposed actions to mitigate adverse effects will be undertaken at the same location as the activity that causes them, and
- (b) complement and contribute to the protection of significant indigenous vegetation, or the habitats of threatened fauna at the local, regional or national level, and
- (c) take into account available information on the full range of biological, social and cultural values of biodiversity and support an ecosystem-scale approach, and
- (d) take into consideration other likely future developments, such as competing land use pressures, within the landscape.

4. Long-term outcomes

Any proposals for **biodiversity mitigation** should be based on an adaptive management approach, incorporating monitoring and evaluation, with the objective of securing outcomes that last at least as long as the activity's impacts, and preferably in perpetuity.

The proposed **biodiversity mitigation** will:

- (a) demonstrate that management arrangements, legal arrangements (e.g. covenants) and financial arrangements (e.g. bonds) are in place for as long as the adverse effects of the activity, and preferably in perpetuity, and
- (b) be able to be implemented and enforced in line with any resource consent conditions associated with the activity. These conditions should include:
 - (i) specific, measurable and time-bound targets, and
 - (ii) mechanisms for adaptive management using the results of periodic monitoring and evaluation against identified milestones to determine whether the **biodiversity mitigation** is on track and how to rectify if necessary, and
- (c) establish roles and responsibilities for managing, governing, monitoring and enforcing the **biodiversity mitigation**, and
- (d) undertake methods by which analysis will identify when milestones of the **biodiversity mitigation** are not achieved, and the causes of non-achievement, and how to revise the management plan to avoid similar occurrences.