

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	15 September 2026

Response to Minute 18: Comments on Additional Freshwater Offsetting and Compensation Opportunities

1. This memorandum is filed on behalf of the Wellington Regional Council (Greater Wellington) in response to the invitation of the Expert Panel at paragraph [11] of Minute 18 dated 4 September 2026, to provide comments on the additional wetland and stream offsetting and compensation opportunities presented by Dr Keesing in his memorandum dated 10 September 2026.
2. This memorandum sets out Greater Wellington's comments on the following matters discussed on pages 9 and 10 of Dr Keesing's memorandum:
 - (a) Down-stream opportunities for offsetting/compensation within the Taupō catchment;
 - (b) Opportunities for offsetting/compensation identified in the Taupō and Western Kakaho sub-catchments;
 - (c) Opportunities for offsetting/compensation identified in the Eastern Kakaho sub-catchment.

Down-stream opportunities within the Taupō catchment

3. Dr Keesing discusses additional stream offsetting/compensation opportunities downstream within the Taupō catchment at page 10 of his memo. His conclusion appears to be that there are no opportunities that are practicable to the applicant. This has been reviewed by Dr Taylor for Greater Wellington. Dr Taylor has provided the following comments in response:

Dr Keesing has noted this could take some effort to complete and considers the benefit may not be too high due to lack of habitat in the upper catchment. At present I agree that perennial habitat is limited; however, in the context of the application with a number of retention ponds to be created in the Taupo Stream catchment, enhancing passage would be beneficial.

In any case, it is recommended SEVs for mitigation streams and ECR undertaken to establish a suitable quantum of mitigation/offsetting/compensation is proposed.

Opportunities identified in the Taupō and Western Kakaho sub-catchments

4. Dr Keesing has identified three additional wetland areas available for enhancement or creation of wetlands at page 9 of his memo.
5. Ms Dixon, for Greater Wellington, has reviewed the additional opportunities identified by Dr Keesing and has the following comments in response:

To get an understanding of what has been proposed I have compared the Figure on page 10 of Dr Keesing's memo with the following plans that were submitted in support of the application:

- *the Landscape Plans (Appendix 21);*
- *Ecological Remediation (Appendix 30-40);*
- *Ecology Overlay (Appendix 30-41); and*
- *Figure 6 of his Ecological Assessment (Appendix 13).*

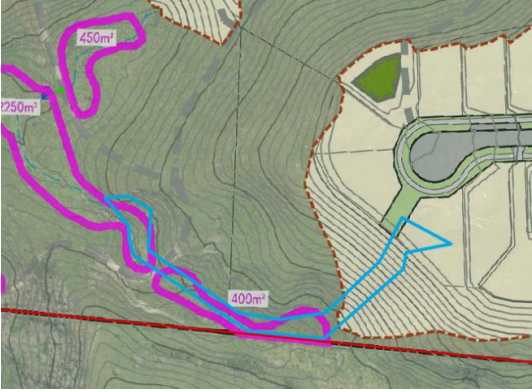
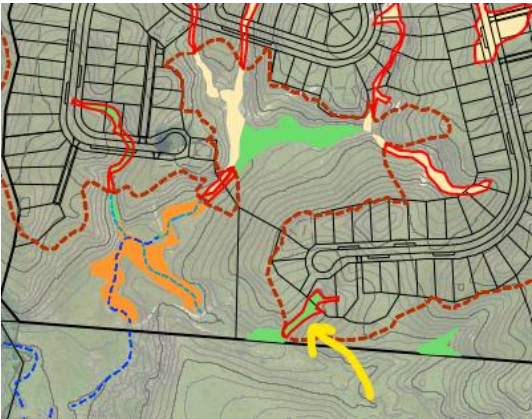
Figure 1 below adds the wetland labels to his Figure and I have summarised what appears to be the wetland creation/enhancement opportunities in Table 1.

In summary, whilst the wetland creation around wetland 32 and the revegetation (and presumably fencing) of wetland 10 represent worthwhile improvements on the current application, they are not of the scale sufficient to achieve the level of offsetting required. As discussed in Table 1, part of Wetland 30 is already proposed to be reclaimed and the remainder is already proposed to be revegetated, so this wetland cannot be considered as an additional wetland creation/enhancement opportunity.



Figure 1: Figure from page 10 of Blue Green Ecology memo dated 10-09-2026 with wetland numbering following Figure 6 of the ecological assessment.

Table 1: Summary of possible extra wetland creation/enhancement areas identified in Blue Green Ecology memo 10 September 2026

Wetland	Area	Creation or enhancement?	Comment
Area to west of Wetland 32	1,740m ²	Creation	Provides additional wetland habitat adjacent to and connected with Wetland 32. This area could potentially be created through bunding rather than excavation. Area is substantially less than discussed at conferencing. (We had thought there might be 0.5 ha here).
Wetland 30	1,198m ²	Enhancement	The upper reach of this wetland is under the earthwork footprint and the remainder is already proposed to be planted – see Figure 2 and 3 below.  Figure 2: Wetland 10 (blue) approximately overlaid on the Ecological Remediation plan (Drawing SK902 R1). The pink area shows proposed planting.  Figure 3: Wetland 10 shown by the yellow arrow. This shows the upper portion of this wetland is proposed to be reclaimed (outlined in red). Snip from Overall Ecological Areas plan (Drawing SK99250 R1).
Wetland 10	935m ²	Enhancement	Existing wetland within the proposed to remain as farm. While it is close to the proposed riparian planting, it does not appear to provide a direct connection to it.

Opportunities identified in the Eastern Kakaho sub-catchment

6. Dr Keesing has identified that an area of land in the Eastern Kakaho sub-catchment “offers both extensive riparian enhancement to a valued perennial stream and river flats wetland creation or enhancement opportunities”¹.
7. Ms Dixon, for Greater Wellington, provides the following comment in response:

I agree with Dr Keesing that the valley floor of the eastern Kakaho appears to be an appropriate location for wetland creation and enhancement. If this area was available to the applicant, it would appear to solve a lot of problems (noting that this was not an area that we viewed on site).
8. Dr Keesing notes that the land he has identified “to my knowledge, is not in the ownership of the applicant and any offset/mitigation would need to be by agreement with the landowner (a third party)”².
9. In response to this, Greater Wellington notes that the land identified by Dr Keesing sits squarely within the application site (see area identified in red in Figure 4). The applicant is not only seeking consent to subdivide this land to create a balance allotment, but also to place a conservation covenant over part of the land (as compensation for the loss of the Taupō Stream) and place several easements to drain stormwater over the land, including to the land identified by Dr Keesing. Additional Wetland 10, identified by Dr Keesing, is also located within this land (see area identified in blue within the balance allotment in Figure 4). This demonstrates that the land is neither beyond the scope of the application nor is it out of the reach of the applicant.
10. Given that the land within the Eastern Kakaho sub-catchment identified by Dr Keesing offers what appears to be extensive riparian enhancement and wetland creation or enhancement opportunities that could resolve the issues identified with ecological offsetting and compensation elsewhere within the project, Greater Wellington considers that those opportunities should be given serious consideration.

¹ Dr Keesing, Memorandum dated 10 September 2026, p.9.

² Dr Keesing, Memorandum dated 10 September 2026, p.9.

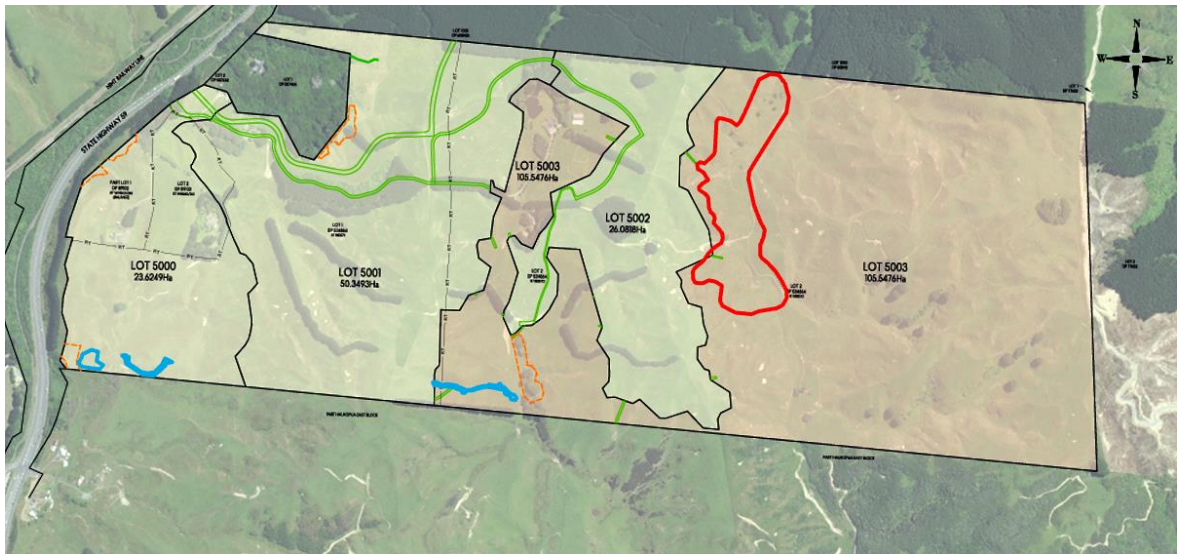


Figure 4: The application site (as identified in superlot drawing 1753-02-1004) with the additional offsetting/compensation opportunities identified in Dr Keesing's 10 September memo overlaid. Opportunities identified by Dr Keesing in the Taupō and Western Kakaho sub-catchment are shown in blue. The opportunity identified by Dr Keesing in the Eastern Kakaho sub-catchment is shown in red.

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