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Submission on the Mt Welcome Fast Track Application

Porirua Harbour and Catchments Community Trust and Guardians of Pāuatahanui Inlet

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We appreciate the opportunity to make a submission on the Mt Welcome development application.

Our submission covers seven matters:

1 There is no case for approving the Mt Welcome development at this time and especially in the proposed relatively isolated and inappropriate location;

2 If approved, the consent duration should be no more than five years and for a limited part of the proposed development;

3 Erosion and sediment movement poses major risks on this rolling to steep hill country site, especially during construction;

4 There are potential problems with stormwater management and disposal including increases in stream erosion, groundwater infiltration, and the creation of wetland - stormwater treatment areas in stream channels;

5 Wastewater disposal proposals seem superficial and inadequate given the acknowledged over capacity limits posed by the downstream systems;

6 Significant Natural Areas need protection and special protection measures are needed for the Pukerua South Bush;

7 Climate change induced storms and heavy rainfall pose extra risks to the Mt Welcome site. We consider an independent review should be conducted of all the design proposals and calculations in this high-risk area, plus ensuring compliance monitoring can identify and deal quickly with emerging problems, especially during construction.

1 Inappropriate Site Location

The location of this development proposal appears to us to be at the wrong end of the Northern Growth Area and should not therefore be approved under the Fast Track process.

The Mt Welcome proposal runs contrary to efforts by Kainga Ora and the previous Government, supported by the Porirua City Council, for a specified development project under the Urban Development Act. This was intended to create a cohesive urban plan covering all seven blocks of the Northern Growth area. Instead, one at a time development blocks will likely create a disconnected series of micro-dormitory communities without building a cohesive and well thought through new addition to Porirua city's environment.

Development is already underway on the Plimmerton Farm area which is much closer to the urban area and amenities of Plimmerton and Mana. Mt Welcome abuts but, initially at least, doesn't even join into the existing urban area of Pukerua Bay to its north. Its access will, if approved, be via a new roundabout on SH59 and this will cause it to be an isolated and initially small enclave with few, if any, supporting urban amenities and reliant on access by private vehicles. It would turn SH59 into an urban collector road and perhaps set a precedent for further such accesses on other possible developments to the south. This situation runs contrary to urban design principles which discourage small, isolated and car dependent low-density developments that cause increases in vehicle use and related carbon emissions. They also cause run-off pollutants into waterways from vehicle tyres, brakes and oil.

The Mt Welcome proposal envisages 949 dwellings over 15 years. At present the wider Wellington region has slow to nil population growth. Such growth as there might be is well catered for by existing developments in other areas including a further expansion to Pukerua Bay to the north and Plimmerton Farm to the south.

For the above reasons, we submit that there is no case for imposing an isolated development enclave in the far reaches of the Northern Growth Area, and we consider the application should be declined at this time.

However, should the Panel decide, under the provisions of the Fast Track legislation, that the Mt Welcome proposal, or parts of it, should proceed, there are matters that we contend need careful consideration as follows:

2 Duration of the consents

For the above reasons of slow to nil growth and an isolated location, we consider that any consent should be limited to 5 years, not the 15 years proposed by the applicant. Social, economic and environmental conditions can change significantly over 15 years.

Locking in a relatively low-density design reliant on private vehicles may well render the development as commercially untenable with few sales and incomplete infrastructure.

It would be far better for any further development proposals to be consented as and if the need arises, and for them to incorporate changes to design and technology that may be applicable in the future. Further, as noted above, we consider any developments in this area ought to be part of an overall cohesive and sequenced strategy that incorporates planned infrastructure for the whole northern growth area.

3 Erosion and Sediment

The Mt Welcome site consists of rolling to steep hill country. This landform is at risk from erosion and sediment movement, especially during construction and storm events. There is increasing evidence that climate change is causing and will cause more frequent and more intense storms with downpours that have significant erosion potential, especially on hill country such as Mt Welcome.

The proposed Mt Welcome development drains into two catchments - those of the Kakaho and Taupō streams. Of these, and as stated in the CARDNO report for Porirua City Council (30 April 2021) the Kakaho catchment poses a high risk of erosion and sedimentation. This significant risk covers the upper reaches of the stream. The downstream ecosystem of the Kakaho stream drains into the Pāuatahanui Inlet which is extremely vulnerable to sediment inflows including related and highly damaging fine muds.

From the information supplied in conjunction with the developer's application, it seems that the areas designated as the Upper Terrace and the Lucas Block drain either partly (in the case of the Upper Terrace) or wholly (in the case of the Lucas Block) into the Kakaho catchment area of the site. Much of the eastern part of the Kakaho catchment appears to be retained as rural land, presumably retaining the areas currently in pasture. Given its position at the very top of the Kakaho catchment, we would like to see as much of this land as possible put into native vegetation cover.

The Taupō catchment poses a moderate risk. Nevertheless, the Taupō stream system flows through the important and nationally valuable Taupō Swamp - designated, as the application notes - as an outstanding natural wetland. The CARDNO report warns against the risks of the Taupō Swamp being significantly affected by upstream sediment and contaminant inputs from urbanisation and related impervious surfaces. We acknowledge that these vulnerabilities are identified in the application and preventative measures are proposed. Risk areas such as batter angles, control of cuts and fills (of which there is a considerable amount proposed), and surface water management need to be carefully designed, managed and monitored. As is mentioned in the CARDNO report, strict management and compliance monitoring should be imposed on any future resource consents. Sediment treatment must be fit for purpose and carefully monitored. Works during winter must be appropriately limited.

We urge the Panel to check that the measures in the application (such as the stage specific erosion and sediment control and related site audit measures) are able to deal with the risks posed and that the Panel places conditions on any approval to ensure implementation is fully carried out and subsequently monitored for performance and maintenance.

4 Stormwater

We note the application includes the desirable objective of achieving water neutrality. A series of measures are proposed to achieve this - pipes, rain gardens and developing wetlands for additional stormwater treatment.

However, the plan acknowledges that there will be an overall increase in discharge from the site. GWRC in Attachment 2 picks up on this and says there will be an increase in groundwater infiltration. They also say that using waterways for stormwater retention - creating wetlands - should be avoided. They note that parts of the Kakaho have not been surveyed adequately - an undesirable omission given it is marked as a wetland retention area (p4).

GWRC notes that upstream (next door) there is pine forest at various stages of harvest. This raises the issue of how the planned design can account for potential hydrology impacts that are unknown.

GWRC also notes that Table 5 (PDP Hydrology Assessment Report) indicates a significant rise in daily discharge volumes in both Taupō and Kakaho West streams and tributaries. No mitigation measures are proposed to manage channelised stream erosion or to prevent further slumping and sedimentation risks downstream.

We therefore have some major concerns with some of the stormwater proposals. These are:

- The increase in ground water infiltration;
- The as yet unknown impact of forest harvesting;
- The fact that parts of the Kakaho have not been surveyed adequately;
- We question why stormwater from roads is not channelled through roadside swales which are now a common feature of water sensitive urban design;
- We consider that the 75% of net site area being available for impervious surfaces is too much. It should at the most be 50%; and
- We suggest that all households should be required to install a 10,000-litre holding tank for stormwater detention and non-potable use. This adds to the critical retention of the first flush during heavy rainfall;
- We question the use of streams for wetland/stormwater treatment areas.

We ask the Panel to carefully review these matters including our suggestions for reducing stormwater outflows. Extra outflow measures are, in the face of increases in climate induced storms and heavy rain, an extra insurance against overwhelming the proposed system. We ask the Panel to adopt them.

5 Wastewater

The applicant notes that the downstream wastewater network (into which wastewater from Mt Welcome will drain) is near or beyond its design capacity. Clearly this requires an adequate and durable wastewater disposal system.

Limiting stormwater intrusion into the wastewater system is vital and stormwater management measures as mentioned above will be needed to ensure this.

We are alarmed by the superficial nature of the four scenarios posed for wastewater in the Civil Infrastructure Report. For instance, section 10.8. indicates that no additional storage on site will be constructed for the Stage 1 of the eventual 949 dwellings and commercial premises. There are also vague assumptions for the other three scenarios in this section concerning downstream wastewater system upgrades taking place in time to accommodate growth. Anyone with local knowledge knows that there are ongoing issues with wastewater overflows along Mana Esplanade and into the Pāuatahanui Inlet whenever there is a significant rainfall event and that the new storage tank in the CBD is not a solution until wastewater can reach it without overflowing. Tiaki Wai's predecessor, Wellington Water, acknowledged that they cannot state when the trunk main will be upgraded through Mana Esplanade to improve the wastewater system capacity. This upgrade has been seen as necessary for over 10 years but is still not programmed to occur. They say that a significant wastewater storage tank would be required near Paremata Bridge to hold wastewater coming from further north.

We therefore urge the Panel to clarify wastewater capacity, storage and handling for Stage 1 of the proposed Mt Welcome development, considering other similar developments in the wider Northern Growth Area.

6 Protection of the SNAs

As has been covered in the submission by the Friends of Taupō Swamp and Catchment (FOTSC), and as noted in the application, there are three Significant Natural Areas within the application site. All of these are in the upper catchment of the Taupō Swamp wetland complex. Each possesses its own recognised unique set of biodiversity values.

FOTSC considers that, whilst the application implies protections for each site, it is the Pukerua South Bush (SNA 029) which needs particular consideration. As stated by the applicant, this SNA (much of which is a QEII covenant) comprises tall canopy indigenous forest, the likes of which are a rarity in the Porirua district. It is also described thus: "includes indigenous vegetation on acutely threatened land environments". (P. 33. FT Substantive Application Mt Welcome, Pukerua Bay, Porirua. March 2026.)

Under current planning, this unique area of forest will be abutted by housing and will have a major access road all along one side. (Figure 10, FT Substantive Application, Mt Welcome, Pukerua Bay, Porirua).

To mitigate the risks of adverse and potentially irreversible effects on the Pukerua South Bush, we support the FOTSC recommendations that:

- At the very least, the whole site must be surrounded with predator proof fencing
- A shelter belt of appropriate native trees should be planted to replace the aged macrocarpa on the north side. The native trees will, in turn, give perpetual wind protection, needed after vegetation clearing for housing.

- Limits are put on the ownership of cats to require landowners who prove they have ‘Catios’- or similar mechanisms to contain cat predation, and that this is monitored in perpetuity.

7 Climate Change

We note the application acknowledges and says it includes climate change issues in its design, especially stormwater management and building requirements.

We cannot overemphasise the importance of taking a carefully considered precautionary approach to dealing with erosion, sediment and stormwater requirements. Before any decisions are made, we consider an independent review should be conducted of all the design proposals and calculations in this high-risk area, plus ensuring compliance monitoring can identify and deal quickly with emerging problems, especially during construction.

-submission ends-