

IN THE MATTER of an application for approvals under section 42
of the Fast-track Approvals Act 2024 ("FTAA")

AND

IN THE MATTER Mt Welcome Project a project listed in
Schedule 2 of the FTAA

STATEMENT OF EVIDENCE OF TONY MICHAEL PAYNE

**TERRESTRIAL ECOLOGY, HERPETOFAUNA: RESPONSE TO THE SECTION 51 AND
SECTION 53 REPORTS**

7 AUGUST 2026

[Solicitors Acting: to be confirmed]

INTRODUCTION

Qualifications and experience

1. My name is Tony Michael Payne. I am a Principal Ecologist and Director at Blueprint Ecology Limited, a consultancy specialising in ecological effects assessment and management.
2. I hold a Bachelor of Science (Biological Sciences, 2008) and Bachelor of Science Honours (Environmental Science, 2009) from the University of Canterbury, New Zealand. I am a Certified Environmental Practitioner with the Environment Institute of Australia and New Zealand (EIANZ).
3. I have over 15 years of experience in environmental research and consulting, specialising in terrestrial and freshwater ecology, herpetofauna management, offset mitigation, and restoration ecology.
4. Since 2010, I have had extensive involvement in local, regional, and nationally significant development projects across New Zealand, including roads of national significance, quarries, wind farms, solar farms, and large scale residential developments. I have been involved on a professional basis with over 100 land development projects.
5. My experience as an expert herpetologist most relevant to this application includes the many lizard surveys used to inform resource consent and Fast track applications, preparing over 30 Lizard Management Plans, research in mitigation habitat design (constructed habitats, plantings) and longitudinal, seasonal use of survey devices, preparing lizard specific predator control plans, undertaking large scale lizard salvages and multi year post release monitoring programmes. Over the past 10 years I have surveyed over 2,000 native lizards across 19 different species between Northland and Otago, and I hold a Wildlife Act Authority from the Department of Conservation ("DOC") that allows me to survey lizards across Aotearoa New Zealand.
6. Puke Kapo Hau Wind Farm, Transmission Gully Motorway, Mt Cass Wind Farm, Haldon Station Solar Farm, Twizel Solar Farm and Lincolnshire Farm are examples of landscape scale developments that required extensive lizard surveys, determination of lizard values and applied effects management.

Code of Conduct

7. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note (2023) and referred to in the Fast track Approvals Act 2024: Panel Conveners' Practice and Procedure Guidance, and I agree to comply with it. In that regard, I confirm that this evidence is written within my expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Involvement in the Project

8. I am the author of the Blueprint Ecology (2025) Lizard Assessment and Lizard Management Plan submitted with the substantive application for the Mt Welcome project.¹ I have overseen all subsequent lizard survey and assessment work associated with the Project, including a comprehensive lizard survey undertaken over 1 to 3 April 2026, reported to DOC by memorandum dated 5 May 2026,² and a further assessment of effects on lizards reported by memorandum dated 8 July 2026.³ I am also the author of the amendments to the Lizard Management Plan described in this evidence, made in response to matters raised in the section 51 report, the accompanying Statement of Advice of Mr Christopher Wedding, and the section 53 technical review prepared for Porirua City Council.

Scope of Evidence

9. In this evidence, I address matters raised by the Department of Conservation in its report provided under section 51(2)(c) of the Fast track Approvals Act 2024 ("the section 51 report"), the Statement of Advice of Mr Christopher Wedding, Herpetologist and contractor to DOC, provided as Attachment A to that report ("Mr Wedding's Statement of Advice"), and the Ecological Review prepared by Dr Nyree Fea of Wildland Consultants Limited for Porirua City Council under section 53 of the Fast track Approvals Act 2024, dated July 2026 ("the PCC review"),⁴ in relation to the wildlife approvals sought by Pukerua Property Group Limited Partnership ("the Applicant") for the Mt Welcome residential subdivision, Pukerua Bay, Porirua.

¹ Blueprint Ecology Limited 2025. Lizard Management Plan: Mt Welcome, Pukerua Bay. Report prepared for Pukerua Property Group Limited Partnership, dated 18 November 2025. See also Blueprint Ecology Limited 2025. Wildlife Approval Assessment: Lizards, Mt Welcome, Pukerua Bay. Report prepared for Pukerua Property Group Limited Partnership, dated 18 November 2025.

² Blueprint Ecology Limited 2026. Mt Welcome, Pukerua Bay: Lizard survey results. Memorandum dated 5 May 2026.

³ Blueprint Ecology Limited 2026. Mt Welcome, Pukerua Bay: Assessment of effects on lizards. Memorandum dated 8 July 2026.

⁴ Wildland Consultants Limited 2026. Ecological Review for a Proposed Residential Subdivision at Mt Welcome Station, Pukerua Bay. Report No. 7831c. Prepared for Porirua City Council. Dated July 2026.

10. Where the section 51 report, Mr Wedding's Statement of Advice, and the PCC review raise overlapping matters, I have addressed those matters under a single heading, consistent with the approach I understand to be conventional in Statements of Evidence of this kind. Where any of these documents raises a matter that the others do not, I have addressed it separately.
11. The PCC review also addresses vegetation clearance, offsetting of indigenous forest loss, indigenous bats, and indigenous birds. Those matters fall within the expertise of BlueGreen Ecology Limited, the author of the Ecological Assessment, rather than within my expertise as a herpetologist, and I do not address them in this evidence.
12. This evidence responds to:
- (a) The ecological value classification of copper skink (*Oligosoma aeneum*) at the regional and national scale.
 - (b) The magnitude of effects and the extent of habitat affected by the Project.
 - (c) The scale at which ecological value and magnitude of effect should properly be assessed, having regard to a recent EIANZ advisory note on that subject.
 - (d) The adequacy of the survey information and the habitat value classification applied to Area 8.
 - (e) The assessment of direct, indirect, and cumulative effects on copper skink and northern grass skink (*Oligosoma polychroma*), including predator related effects.
 - (f) The application of the nine principles set out in the Department of Conservation Lizard Technical Advisory Group's *Key principles for lizard salvage and transfer in New Zealand* (2019).⁵
 - (g) The suitability and carrying capacity of the receiving sites, including [REDACTED], and the species proposed to be included within the wildlife approval.
 - (h) Additional matters raised in the Lizard Management Plan, the section 51 report, and the PCC review concerning staging, lizard proof fencing, predator control funding and duration, and reporting.

⁵ Department of Conservation Lizard Technical Advisory Group 2019. Key principles for lizard salvage and transfer in New Zealand. Department of Conservation, Wellington. 19 p.

- (i) The duration of the Wildlife Authority term.
- (j) The proposed biodiversity offset condition and its relationship to the National Policy Statement for Indigenous Biodiversity 2023 ("NPS IB").
- (k) Animal welfare and euthanasia provisions.
- (l) Further matters raised at paragraphs 8.8.2 and 8.8.3 of the section 51 report, and further matters raised in the PCC review regarding the overall extent of vegetation and habitat loss.

ECOLOGICAL VALUE OF COPPER SKINK AT THE REGIONAL AND NATIONAL SCALE

13. Mr Wedding assigns copper skink a Very High ecological value at the regional scale, based on its classification as Threatened, Regionally Vulnerable in the Wellington region.⁶ I disagree. In my opinion, a High value is the appropriate classification for copper skink at the regional level under the EIANZ (2018) guidelines,⁷ which exist precisely to allow professional judgement to be exercised rather than a threat classification to be applied mechanically.
14. The regional threat classification for copper skink was revised within a three year period, and the reclassification was driven by the interpretation of a single study. In 2020, copper skink, classified nationally as Not Threatened, was assessed by Crisp as Regionally Threatened, Critical on the mainland, the highest possible threat classification before a species becomes extinct.⁸ That classification appears to have rested substantially on a single study reporting a decline in excess of 70 percent (Hoare et al. 2007).⁹ In 2023, the classification was revised to Regionally Vulnerable.¹⁰ The basis for that revision was a reinterpretation of the same study, with the estimated decline revised down to the 50 to 70 percent range. A classification that has moved from the most severe category available to a materially lower category on the basis of one reinterpreted historic study is not a stable or reliable foundation for a Very High effects classification in this proceeding.

⁶ Crisp P, Hitchmough R, Newman D, Adams L, Lennon O, Woolley C, Hulme Moir A, Bell T, Herbert S, Spearpoint O and Nelson N. 2023. Conservation status of reptile species in the Wellington region. Greater Wellington Regional Council, Publication No. GW/ESCI G 23/03, Wellington.

⁷ Roper Lindsay, J., Fuller S.A., Hooson, S., Sanders, M.D., and Ussher, G.T. 2018. Ecological impact assessment. EIANZ guidelines for use in New Zealand: terrestrial and freshwater ecosystems. 2nd edition.

⁸ Crisp P. 2020. Conservation status of lizard species in the Wellington region. Greater Wellington Regional Council, Publication No. WRC/ESCI G 20/2, Wellington.

⁹ Hoare, J.M., Pledger, S., Nelson, N.J. and Daugherty, C.H. 2007. Avoiding aliens: behavioural plasticity in habitat use enables large, nocturnal geckos to survive Pacific rat invasions.

¹⁰ Crisp P, Hitchmough R, Newman D, Adams L, Lennon O, Woolley C, Hulme Moir A, Bell T, Herbert S, Spearpoint O and Nelson N. 2023, above n 6.

15. Copper skink is, in fact, widely distributed across the Wellington region, recorded in the Kapiti Coast District, Porirua City, Wellington City, Hutt City, Upper Hutt City, South Wairarapa District, and Carterton District, with over 100 independent records within Wellington City and Hutt City districts.¹¹ ¹² Approximately 15 percent of the Sounds Wellington Ecological District, some 7,800 ha, comprises broadleaved indigenous hardwood or seral secondary native forest, all of which provides potential copper skink habitat.¹³
16. I was involved in a lizard salvage at Shelly Bay, Miramar Peninsula, in 2023, which recorded 97 copper skink over 2,750 square metres, a minimum known alive density of 353 animals per hectare.¹⁴ Applying reasonable assumptions about detection probability, that density could reasonably equate to approximately 500 animals per hectare based on the proportion of the population actually detected. Within the Miramar Peninsula alone there is approximately 165 hectares of forest and scrub providing potential copper skink habitat. At a density of 353 animals per hectare this area alone could support in the order of 58,000 copper skink. None of this information was before the authors of the regional threat classification.
17. I note, by way of comparison, that DOC's own attached Table 4 to the section 51 report records the IUCN Red List status of both copper skink and northern grass skink as Least Concern, stable.¹⁵ I consider this to be significant. It is the Director General's own report that supplies independent, internationally recognised confirmation that neither species is considered globally at risk, notwithstanding the regional classification Mr Wedding relies upon. A regional classification that stands in such contrast to the IUCN assessment, and that has itself proven unstable within a three year period, should be treated with appropriate caution rather than adopted uncritically as the basis for a Very High effects rating.
18. Regional and national threat classifications can, and do, change as scientific understanding improves. Archey's frog (*Leiopelma archeyi*) provides a recent and directly comparable example, having been reclassified by DOC from Threatened, Nationally Vulnerable, to At Risk, Declining, reflecting improved data rather than a

¹¹ Crisp P. 2020, above n 8.

¹² Department of Conservation Bioweb database, July 2023.

¹³ Landcare Research 2015. LCDB v4.1, Land Cover Database version 4.1. <https://iris.scinfo.org.nz/layer/423/lcdb-v41-land-cover-database-version-41-mainland-new-zealand/>

¹⁴ RMA Ecology Limited 2023. Shelly Bay: Stage 2 lizard salvage. Prepared for Egmont Dixon Limited. Dated 15 May 2023.

¹⁵ DOC report provided under section 51(2)(c) of the Fast track Approvals Act 2024 for FTAA 2603 1181, dated 17 July 2026, Table 4.

change in the species' actual conservation trajectory.¹⁶ The copper skink classification history in the Wellington region follows the same pattern.

19. I also note that Mr Wedding's own evidence in other proceedings is inconsistent with the Very High classification he adopts here. In his Statement of Evidence for Proposed Plan Change 6 to the Hauraki District Plan, dated 15 November 2024, Mr Wedding assessed the terrestrial environment within the proposed Martha Mineral Zone as "generally of low ecological value," describing vegetation cover as consisting of "amenity gardens and other planted assemblages," akin to the values on this site, and expressly noted that At Risk copper skink may potentially be present within that same low value vegetation "such as planted compositions or urban gardens."¹⁷ In that evidence, Mr Wedding did not elevate the ecological value of the vegetation because of the potential presence of copper skink. The same approach should logically apply here, where copper skink occupy a similarly modest area of low value, human modified vegetation.
20. The PCC review, prepared by Dr Fea of Wildlands Consultants Limited, takes a different approach again, and submits that the Lizard Management Plan needs updating because it does not treat copper skink as a Threatened species, in accordance with the Department of Conservation principle that more threatened species require greater consideration than less threatened species. I disagree that the Regionally Threatened classification for copper skink is appropriate, for the reasons already given, and instead adopt the current national classification for this species, At Risk, Declining.¹⁸ Applying the EIANZ (2018) matrix to a national At Risk classification independently confirms a High, rather than Very High, ecological value for copper skink, consistent with the conclusion I reach on regional grounds above. Whether copper skink's value is assessed by reference to a properly weighted regional classification or by reference to the current national classification, the outcome is the same: High value, and greater consideration commensurate with that value, has been given throughout the Lizard Management Plan and this evidence, but a Very High classification is not supported.

MAGNITUDE OF EFFECTS AND EXTENT OF AFFECTED HABITAT

21. Mr Wedding submits that magnitude of effect should not be assessed at an individual site level, and that the affected lizard habitat is likely to be in excess of 3 ha, such that

¹⁶ Department of Conservation. New Zealand Threat Classification System conservation status of Archey's frog, *Leiopelma archeyi*.

¹⁷ Wedding, C.J. 2024. Statement of Evidence of Christopher James Wedding on behalf of OceanaGold (New Zealand) Limited, Proposed Plan Change 6 to the Hauraki District Plan, dated 15 November 2024, at paragraphs 17 to 19.

¹⁸ Hitchmough, R., Barr, B., Knox, C., Lettink, M., Monks, J.M., Patterson, G.B., Reardon, J.T., van Winkel, D., Rolfe, J. and Michel, P. 2026. Conservation status of New Zealand reptiles. New Zealand Threat Classification Series. Department of Conservation, Wellington.

removal of almost all habitat associated with the only known copper skink population within the development site is consistent with a Very High magnitude of effect.

22. I agree that magnitude of effect must be considered at the appropriate scale, and that scale is typically national, regional, or Ecological District, consistent with EIANZ (2018) guidance and the Resource Management Act 1991. I do not accept the extent of affected habitat asserted by Mr Wedding. The Blueprint Ecology (2026) assessment of effects memorandum establishes that the actual area of habitat directly affected by the development footprint totals 3,484 m² (c. 3,500 m²), comprising the confirmed copper skink habitat at Area 8 (an approximately 100 square metre isolated grass fragment) and the immediately adjoining pine forest edge within the works footprint.¹⁹ Pine plantation and planted indigenous vegetation situated on a very steep, south facing slope make up the great majority of the wider area Mr Wedding includes in his 3 hectare figure, in addition to an existing road, and these areas do not constitute lizard habitat and should not be included in any figure purporting to represent the extent of habitat affected. In addition, Mr Wedding includes approximately 8,000 m² of vegetation within his 3 ha figure that is outside of the proposed development footprint entirely. Copper skink is heliothermic and requires warm basking areas with adequate sun exposure combined with complex ground cover. Very steep, south facing slopes, a gravel road, and the interior of pine plantation do not provide suitable habitat.
23. The premise that the Project would remove "almost all habitat associated with the only known threatened copper skink population" is also mistaken. The copper skink population at Area 8 is, in my opinion, almost certainly derived from the Queen Elizabeth the Second National Trust ("QEII") covenant forest on the adjacent property, since all other surrounding native remnant habitat suitable for a forest associated species such as copper skink has been cleared. The QEII covenant forest margin is being avoided by the Project and is proposed to be enhanced, not removed. The premise that the small grass fragment at Area 8 represents the entirety of available habitat for this population is, accordingly, unfounded.
24. Far from removing habitat, the Project protects and enhances 6,700 m² of grassland and shrubland mosaic and 1,880 m² of forest for copper skink, an increase in the extent of available habitat of more than two times the total area affected for this species and northern grass skink, delivered in advance of the effect occurring.²⁰ Copper skink is a

¹⁹ Blueprint Ecology Limited 2026, above n 3.

²⁰ Blueprint Ecology Limited 2026, above n 3.

species of small body size and high fecundity with a demonstrated tolerance of mammalian predators, and these life history traits make it particularly well suited to successful establishment following relocation, provided receiving habitat of adequate extent and quality is available, which it is here.

25. It would not be reasonable or practicable to preserve a 100 m² patch of grassland at the margin of a road, within an area zoned for residential development. Strict avoidance of this fragment is neither necessary nor beneficial to the population, given the scale of habitat creation proposed in advance of the effect. In my opinion, the pre mitigation magnitude of effect on copper skink is properly assessed as Low.

SCALE OF ASSESSMENT: THE EIANZ ADVISORY NOTE

26. An EIANZ advisory note, published by the New Zealand Chapter in August 2026, provides further interpretation of the use of scale in an assessment of ecological effects under the EclA Guidelines.²¹ The note confirms that magnitude of effect should generally be assessed at the same spatial scale as the ecological value assessment, and that wider district, regional, or national context may inform, but should not be used to dilute or amplify, an effect properly benchmarked at that scale. I consider this advisory note directly relevant to two aspects of this proceeding.
27. First, it supports the approach taken in this evidence. Copper skink's ecological value has been assessed at the regional scale throughout this evidence, and independently confirmed at the national scale above. It follows, consistent with the EIANZ note, that the magnitude of that same regional and national scale value is the appropriate scale at which to assess magnitude of effect, and the district wide distribution and density evidence set out above, including the Shelly Bay density data, over 100 independent regional records, and thousands of hectares of potential habitat within the Ecological District, is properly before the Panel as the ecologically correct comparator, not an improper dilution of a locally assessed value. This is precisely the scenario the EIANZ note endorses: value and magnitude pinned to the same scale, with wider context informing rather than replacing that scale.
28. Second, and by contrast, I consider Mr Wedding's own approach to be the clearer example of the scale misapplication the EIANZ note warns against. Mr Wedding submits, correctly in my view, that magnitude should not be assessed "at an individual site level"

²¹ Environment Institute of Australia and New Zealand 2026. Ecological Impact Assessment (EclA): EIANZ Guidelines for use in New Zealand: terrestrial and freshwater ecosystems. Interpretation of scale in assessment of ecological values and magnitude of ecological effects. August 2026.

and invokes the wider Ecological District as the appropriate context. Having adopted that broader frame, however, his ultimate magnitude conclusion reverts to the narrowest possible scale available, the fate of a single, small, local population within the development site, described as "the only known threatened copper skink population." A Very High magnitude conclusion reached in this way moves between scales depending on which produces the more severe outcome, precisely the practice the EIANZ note cautions against. Applied consistently at either the regional or the Ecological District scale that Mr Wedding himself proposes, and having regard to the wide distribution and locally high densities of copper skink addressed above, the magnitude of effect on copper skink from this Project is properly assessed as Low, not Very High.

ADEQUACY OF SURVEY INFORMATION AND HABITAT VALUE CLASSIFICATION

Survey effort and results

29. The PCC review submits that the length of the April 2026 survey was unusually short, and that surveys would normally be undertaken over a full week rather than three days. I do not accept that a survey must, as a matter of principle, occur over a full week. In my opinion, the length of the April 2026 survey, three independent days using 110 survey devices (330 device checks), was appropriate for determining lizard presence or absence and a rough order of abundance within the potential habitats on site. The reviewer's opinion that a survey must arbitrarily occur over a full week is unsubstantiated, and the survey results themselves demonstrate that this effort was adequate to detect both species present at the site.
30. In addition to the April 2026 survey, the site has been surveyed by me on four other occasions, each of which is directly relevant to the reliability of the current assessment. On 13 March 2019, I undertook a manual search targeting lizard microhabitats across the site, including shelterbelts, pine forest, buildings, farm debris, logs, rocky outcrops within grazed pasture, and garden vegetation margins, and recorded no lizards or lizard sign. Between 11 and 12 August 2020, I undertook continued incidental checking of potential lizard habitat across the site. On 24 September 2025, I repeated a manual search targeting the same lizard microhabitats, again recording no lizards or lizard sign. Taken together with the April 2026 survey, this represents five separate site visits across more than six years, providing a considerably more robust evidential basis than a single short survey, and consistently confirming the very limited extent and low density of lizard habitat on site outside the confirmed locations.

31. The April 2026 survey recorded three individual copper skink, comprising one male, one female, and one juvenile. One of these three individuals was captured on a second occasion, giving four capture events across the survey in total. I clarify this because the section 51 report and Mr Wedding's Statement of Advice each refer to copper skink numbers in slightly different terms, and I wish to remove any ambiguity: three individual copper skink were confirmed on site.
32. The area in which copper skink were recorded is bounded by short grazed pasture, which does not support lizards, a road, which is not habitat, and a steep, pine covered bank. Logs and needle piles beneath the pine trees were manually searched on two separate occasions, approximately one hour each, and no lizards or lizard sign were recorded. Manual searching of this kind is a reliable and accepted technique for surveying lizards in pine forest environments, where pine needles are readily swept back to the base layer and logs and debris can be directly inspected. This result is consistent with an independent survey within the adjacent property at Muri Road, undertaken by Dr Graham Ussher of RMA Ecology Limited, which similarly recorded no lizards within pine forest areas.²²

Area 8 and the adjoining vegetation

33. Mr Wedding submits that confirmation of copper skink at Area 8 provides a reasonable basis to treat the surrounding contiguous vegetation as potential habitat, and that the Low value classification applied to Area 8 is inconsistent with the Lizard Management Plan's own valuation criteria.
34. I do not accept that contiguous vegetation should be treated as habitat of equivalent value simply because it is physically connected to a location where lizards were recorded. Lizards occupy their preferred habitat, and do not colonise adjacent areas of structurally inferior, sub optimal habitat while suitable habitat remains available nearby. This is a well established principle of habitat selection in reptile ecology, and it is directly supported by the empirical pattern observed at this site. Copper skink were confirmed only within the dense, sunny grass fragment at Area 8, and northern grass skink were only recorded within the dense, sunny grass fragments at nearby locations at Areas 9 and 10. No lizards or lizard sign were recorded in the connected pine forest vegetation, despite thorough manual searching, a structurally and thermally distinct environment.

²² RMA Ecology Limited 2025. 34 Muri Road, Pukerua Bay, Porirua: Lizard assessment of SNA clearance areas. Prepared for Pukerua Holdings Limited, dated 13 January 2025.

This absence is not an artefact of survey effort. It reflects a genuine ecological difference between the two environments.

35. Area 8 is an isolated fragment of thick grass of approximately 100 m². Given its very small size and its context, hemmed in by a road, grazed pasture, and a steep, shaded pine margin, it provides Low habitat value. It is not of a size to support a large population and is not important habitat in the context of the species as a whole. The site is a steep, south facing slope. It is apparent from visiting the site that lizards are highly likely to occur only on the sunnier, northern edge of the shrubland where dense grass and complex cover are present, and are highly unlikely to occur where cover is lacking and the slope is cold and steep. Area 8 is, for this reason, correctly classified as Low value, and this classification is not inconsistent with the Lizard Management Plan's own criteria once the specific microhabitat context of this fragment, rather than the broader vegetation type it sits within, is properly considered.

Extent of vegetation and habitat loss

36. The PCC review also asks what the entire amount of vegetation loss across the property is, by vegetation and habitat type, and what areas were defined as not being lizard habitat. Lizard habitat within the development footprint is set out in Table 1 and Figure 1 of the Blueprint Ecology (2026) assessment of effects.²³ The total area of lizard habitat within the development footprint, confirmed by the April 2026 survey, is 3,484 m². This comprises nine small, discrete areas of Low quality, exotic dominant terrestrial habitat, principally long grass along vegetation margins and gardens. All other areas within the development footprint have been assessed and defined as not being lizard habitat, for the reasons given throughout this evidence.

ASSESSMENT OF DIRECT, INDIRECT, AND CUMULATIVE EFFECTS

Magnitude classification in the Lizard Management Plan

37. Mr Wedding raises three concerns with the Low magnitude of effect assigned to copper skink in Table 3 of the Lizard Management Plan. I address each in turn.
38. First, Mr Wedding is concerned that the number of animals captured during a short survey has been treated as an estimate of the number present. It has not. The effects assessment uses the survey result to provide context, not as a population estimate. A

²³ Blueprint Ecology Limited 2026, above n 3.

small number of individuals recorded within a small area of confirmed suitable habitat, approximately 100 m², is indicative of a small population, consistent with the very limited extent of suitable habitat available at this location.

39. Second, Mr Wedding proposes that the availability of similar vegetation elsewhere in the Ecological District is not an appropriate basis for concluding that the magnitude of effect is Low. I disagree with the way this point has been framed against my assessment. The magnitude of effect here is properly assessed as Low principally because the area of habitat affected is very small in absolute terms, not because similar vegetation exists elsewhere. That said, the wider distribution of copper skink within the Ecological District, including over 100 individual records and thousands of hectares of potential habitat, together with the high densities recorded at Shelly Bay, is directly relevant context for understanding the very small magnitude of effect associated with the population affected by this Project.
40. Third, Mr Wedding submits that salvage and relocation, being mitigation measures, should not be used to reduce the description of the pre mitigation magnitude of effect, and that listing salvage again as a mitigation measure double counts it. I accept that salvage should not be relied upon twice in this way. Salvage directly minimises the effect on individual lizards and therefore reduces the effect before any further mitigation, such as predator control, native planting, and the protection of habitat over an area more than two times the size of that affected, is applied. Given the very small number of copper skink potentially affected, I however maintain that the pre mitigation magnitude of effect is Low.

Predator related effects, including cats and rats

41. Mr Wedding and DOC raise concerns regarding the adequacy of domestic cat and rodent control at the release sites and the QEII covenant forest margin, and regarding the potential for long term habitat degradation from residential predator sources.
42. I accept that the pest management measures proposed for the QEII covenant forest margin should also be applied across all terrestrial release areas, and the Lizard Management Plan has been amended accordingly, noting that Release Areas 1 and 2, which adjoin the QEII covenant forest margin, were already included. The proposed cat trapping measures are located at the margins of retained and created habitat, and will intercept roaming domestic cats before they enter that habitat.

43. It is also relevant to the current environment against which effects are assessed that the already consented residential development at Muri Road, which I understand comprises 144 consented houses with a further 400 to 600 anticipated, will itself introduce cats and rats capable of roaming into the adjacent QEII protected forest, independent of this Project. Predator pressure from domestic cats and rats associated with residential development at this location is not an effect solely introduced by this Project. The lizard species present on site already coexist with a range of mammalian predators. The persistence of these species under existing predation pressure is attributable to their use of complex, structurally diverse habitat providing protective refuge, which is precisely what the Project's habitat creation and enhancement programme will provide at a scale exceeding what is being affected.
44. Ten years of cat control is proposed to allow sufficient time for the residential community to establish and for the infrastructure required to support a resident led "Predator Free" style programme to be put in place, consistent with the model adopted by comparable community groups in the Wellington region, including Predator Free Brooklyn, Predator Free Khandallah, Predator Free Thorndon, Predator Free Aotea, and Pest Free Plimmerton. It is not practicable to require cat control in perpetuity, but the ten year term provides a realistic pathway to a community sustained programme. In my opinion, the potential chronic effect of domestic cat predation on lizards is appropriately addressed such that the residual effect is Low.

Fragmentation and long term habitat suitability

45. I do not accept that the Project results in meaningful additional fragmentation of lizard habitat. The landscape in which the site sits is already highly fragmented by historic pastoral farming and pine plantations. The Project does not create further fragmentation beyond what already exists. Rather, by retiring grazed pasture, establishing log stacks, and undertaking native planting, it materially increases the extent and quality of habitat available on site, delivering a net gain in both area and habitat quality.
46. The post development suitability of retained and created habitat over the life of the subdivision has been addressed by designing receiving environments intended to provide habitat over the long term, with multiple release areas providing resilience in the event that any single area does not perform as expected. This approach mirrors that applied successfully at Lincolnshire Farm, Grenada, where retiring grassland and

creating log stacks produced a demonstrated, sustained benefit to relocated lizard populations.²⁴

APPLICATION OF THE DOC LIZARD TECHNICAL ADVISORY GROUP PRINCIPLES

47. I have structured this section by reference to the nine principles set out in the DOC Lizard Technical Advisory Group's *Key principles for lizard salvage and transfer in New Zealand* (2019),²⁵ which DOC, Mr Wedding, and the PCC review have each applied as the framework for their advice.

Principle 1: Values and site significance at impact and receiving sites

48. Mr Wedding submits that this principle is not fully met, on the basis that the impact site habitat is incompletely mapped, copper skink is undervalued, and the receiving sites have not been surveyed to establish presence, relative abundance, or carrying capacity for northern grass skink or copper skink.
49. I disagree. The impact site has been accurately mapped following multiple lizard surveys, the last of which demonstrated that the earlier assessment in the Lizard Management Plan was overly conservative. The fundamental approach of the Lizard Management Plan is to create lizard habitat in areas that do not currently provide it, by ceasing grazing, establishing log stacks, undertaking native planting, and implementing predator control. This method has been demonstrated as successful for lizard translocations in the Wellington region at Jamaica Rise, Sasanof View, and Lincolnshire Farm.²⁶ A pre translocation survey of the shared receiving site for Jamaica Rise and Sasanof View recorded no lizards prior to release, confirming that the absence of lizards from an area being prepared as habitat is the expected starting condition, not a barrier to successful establishment.

Principle 2: Actual and potential effects and their significance

50. For the reasons given above regarding habitat extent, value classification, magnitude of effect, and the appropriate scale of assessment, I consider this principle to be adequately addressed.

²⁴ Blueprint Ecology Limited 2025. Lincolnshire Farm, Stage 2: lizard salvage results. Memorandum to Lincolnshire Farm Limited, dated 26 August 2025. See also Blueprint Ecology Limited 2026. Lincolnshire Farm: Year 3 release site lizard monitoring. Memorandum to Lincolnshire Farm Limited, dated 8 July 2026.

²⁵ Department of Conservation Lizard Technical Advisory Group 2019, above n 5.

²⁶ Blueprint Ecology Limited 2026. Jamaica Rise and Sasanof View: Joint post release monitoring. Memorandum to Carrus Limited, dated 13 July 2026.

Principle 3: Alternatives to moving lizards

51. Mr Wedding submits that avoidance options for the confirmed copper skink habitat have not been independently assessed. I disagree. Avoidance of the small, isolated grass fragment at Area 8 is not warranted and would produce a perverse outcome for the population. Preservation of an isolated fragment at the margin of a road would provide no meaningful benefit to the population.

Principle 4: Greater consideration for threatened species

52. Mr Wedding submits that the Lizard Management Plan does not give proper weight to copper skink's status as Threatened, Regionally Vulnerable. The PCC review raises a related concern, that the Lizard Management Plan does not treat copper skink as a Threatened species at all, and needs updating in accordance with the DOC principle that more threatened species require greater consideration than less threatened species. As set out above, I have given full consideration to copper skink's status, weighed against the scientific basis for the regional classification, and against copper skink's current national classification of At Risk, Declining and its Least Concern IUCN status. For the reasons already given, I consider High, rather than Very High, to be the appropriate value on either the regional or the national basis, and the management response, including the habitat creation ratio exceeding three to one, is proportionate to that assessment.

Principle 5: Best available salvage, transfer, and release methodology

53. Mr Wedding raises concerns regarding the proposed capture effort, completion criteria, spotlighting effort, log stack provision, and planting density. The PCC review raises related and additional concerns regarding cover check duration, lizard proof fencing, and safe access for spotlighting in forest habitat. I address each below.
54. Given the confirmed presence of copper skink, the Lizard Management Plan has been updated to require five days of device checks with three consecutive suitable days without capture before salvage can conclude, and three nights of spotlighting. The PCC review recommends a minimum of two weeks of cover checks immediately prior to construction. I do not accept that two weeks is required. The purported two week minimum described as a "standard approach" is unsubstantiated and has not been a required condition for over a dozen Wildlife Act Authorities I have been issued by DOC for lizard salvages. A minimum five day period of checks, with three consecutive days of no captures required before salvage can conclude, is a cautious approach which has

recently been accepted by the Fast track Approvals Panel for the Stage 2 Puke Kapo Hau Wind Farm.

55. The PCC review also queries the safety justification given for not searching the interior of broadleaved forest habitat, and submits that no spotlighting survey has been undertaken in indigenous forest or scrub, meaning it cannot be concluded that other lizard species, including barking gecko, are unlikely to be present. The safety reason was the risk of vehicles on the adjoining road striking staff while surveying edge habitat. The Lizard Management Plan has been updated to require three nights of spotlighting, addressing both Mr Wedding's and the PCC review's concerns on this point. [REDACTED] [REDACTED] is a suitable release site for barking gecko and any other forest dwelling species, that may be discovered during salvage, for the reasons given in Principle 6 below, and this has been confirmed by DOC on multiple occasions.
56. I do not agree that the one day duration proposed for supervised clearance requires extension, given the small scale of vegetation clearance involved. The provision of approximately one log stack per ten relocated lizards has been demonstrated as sufficient at Jamaica Rise, Sasanof View, and Lincolnshire Farm, and I am satisfied it remains appropriate here.²⁷ The proposed planting of approximately 20 percent of terrestrial release areas is intended to establish a mosaic of microhabitat heterogeneity that will mature over time, working in combination with retained long grass, which already provides the structural cover type these species are recorded using at the impact site, rather than to provide the entirety of ground cover at the point of release.
57. The PCC review submits that lizard proof fencing is required at the release sites, on the basis that lizards may attempt to return to the salvage area due to a strong homing instinct if not prevented from doing so, and that this depends on the salvage occurring over a week or more. I do not accept that lizard proof fencing is required at the release sites. Habitat will be cleared within one week of salvage finishing. The release sites are typically hundreds of metres from the impact sites, with large areas of grazed pasture between them, and lizards are highly unlikely to return across that distance to the area from which they were salvaged. This behavioural response was not recorded following three years of post release monitoring at Sasanof View, Jamaica Rise, or Lincolnshire Farm. Those populations instead established within the long grass and log stacks provided at the release sites themselves.

²⁷ Blueprint Ecology Limited 2026, above n 27.

Principle 6: Long term suitability and carrying capacity of receiving sites

58. Mr Wedding, DOC, and the PCC review submit that the on site release areas are small and disconnected, and that no carrying capacity assessment demonstrates that [REDACTED] or the on site receiving areas can accommodate the species proposed to be included in the wildlife approval. The PCC review adds that lizard surveys, or equivalent habitat surveys, are usually required at receiving sites to determine carrying capacity, and queries whether the release sites were covered by the lizard survey.
59. I disagree that the release areas are meaningfully disconnected. Release Areas 1 and 2 are contiguous with the QEII covenant forest and are separated from each other by only 8 metres, forming, in substance, a single expanded and enhanced habitat area rather than two isolated patches. Release Areas 3 and 4 are separated by approximately 20 metres and are joined by a pine hedgerow and wetland. Lizards readily disperse across distances of this order, and these release areas are not functionally isolated. The five release areas average approximately 1,340 m² each, substantially larger than the average confirmed impact area of approximately 180 m². All copper skink captured will be released into Release Area 1, with two dedicated log stacks constructed for this species in addition to those provided for northern grass skink, and additional log stacks will be provided at a ratio of one per ten animals should more than 20 copper skink ultimately be captured. Given the release areas are larger, of higher habitat quality, and not currently occupied by resident lizard populations due to grazing, there are no carrying capacity constraints on the numbers of animals expected to be relocated. The appropriateness of the release sites, including their existing vegetation cover and habitat quality relative to the impact sites, has been described throughout this evidence, and I do not consider a further dedicated lizard survey of the release sites is required, given they currently comprise grazed pasture that does not support a resident lizard population and is being actively enhanced in advance of any release.
60. [REDACTED] extends to approximately 16 ha and is one of the best examples of remnant native forest in the local area. DOC has previously accepted that [REDACTED] [REDACTED] [REDACTED] [REDACTED] is a suitable receiving site for ngahere gecko (*Mokopirirakau* "Southern North Island"), barking gecko (*Naultinus punctatus*), ornate skink (*Oligosoma ornatum*), glossy brown skink (*Oligosoma zelandicum*), and Raukawa gecko (*Woodworthia maculata*), as well as copper skink, in connection with Wildlife Act Authorities 117207 FAU and 111140 FAU. [REDACTED] provides ideal

habitat for all of these species, as would be expected of a large area of diverse, mature native forest that has benefited from many years of sustained predator control. I do not accept the recommendation in the section 51 report, at paragraph 6.4.1, that these species should be excluded from the wildlife approval on the basis that the suitability of [REDACTED] has not been demonstrated. That suitability has already been established and accepted by DOC in respect of the same receiving environment under the two Wildlife Act Authorities referred to above, and no different conclusion is warranted here, particularly given the very small number of forest associated lizards, fewer than five of any species other than copper skink, expected to require release into this reserve.

61. The PCC review recommends that predator control at the [REDACTED] release site be undertaken for a minimum of five years, in contrast with the two year predator control period I consider appropriate at the on site copper skink and northern grass skink release areas addressed below. I do not accept that five years of applicant funded predator control is required at [REDACTED]. Unlike the on site release areas, which comprise newly retired grazed pasture with no existing predator management, [REDACTED] already benefits from long established, ongoing predator control that is independent of this Project and not time limited to a fixed number of years. Pest Free Plimmerton has undertaken pest control in the area since 2016, maintaining a network of 444 traps, and has recorded controlling 2,691 rats, 243 hedgehogs, 149 mustelids, and 17 possums over the past eight years.²⁸ Pest Free Plimmerton also maintains a network of DOC200 traps at the forest lizard release site, and Greater Wellington Regional Council maintains a network of bait stations at approximately 100 metre intervals, primarily targeting possums but also providing some suppression of rats. Pest Free Plimmerton intends to maintain this network and its associated advocacy for many years, independent of any contribution from this Project. In these circumstances, a two year predator control commitment at the on site release areas, where no equivalent existing programme operates, and continued financial support for the already mature, long running programme at [REDACTED], is an appropriate and proportionate response, rather than requiring the applicant to fund and operate a new, separate five year programme within an area already subject to sustained community led predator control.

Principle 7: Monitoring

²⁸ Pest Free Plimmerton, trapping records, 2016 to 2024.

62. Mr Wedding and DOC submit that the 20 individual capture threshold for triggering post release monitoring is inappropriate for copper skink, given the risk that an entire regionally threatened population could be relocated without any monitoring, and that three years is insufficient to determine population establishment.
63. I do not accept that meaningful conclusions can, or should, be drawn from attempting to monitor a very small number of individuals of a cryptic species. Lizard detection is subject to imperfect detectability, meaning that the probability of recording an animal that is genuinely present is always less than one, and that probability falls further as the population being monitored becomes smaller.²⁹ Where very few individuals are released, a monitoring survey that records no animals cannot reliably distinguish between two very different underlying states: a population that has failed to establish, and a population that is present but simply was not detected on that occasion, an outcome that becomes statistically more likely, not less, as sample size falls. Attempting to draw firm conclusions about establishment success or failure from monitoring a handful of animals therefore carries a material risk of an erroneous conclusion in either direction. This is precisely why DOC's own standard practice, reflected in the 20 individual threshold applied elsewhere in the Lizard Management Plan, treats that number as the appropriate minimum before a dedicated monitoring programme is warranted. I consider that threshold to be soundly based and see no principled reason to depart from it for copper skink specifically.
64. On duration, both copper skink and northern grass skink reach sexual maturity at approximately two to three years of age, with females capable of producing two to seven offspring per year.³⁰ Three years of monitoring therefore provides sufficient time for relocated individuals to acclimatise to the release site, for juveniles relocated during salvage to reach sexual maturity, and for the first breeding cohorts to produce offspring capable of independent survival. A three year programme, conducted at regular intervals using consistent methodology, will generate a minimum of three data points, which is sufficient to identify population trajectory and determine whether density at the release site is increasing, stable, or declining. This approach, and this duration, has been sufficient to determine translocation success at Sasanof View, Jamaica Rise, and Lincolnshire Farm, each of which met established success criteria within the monitoring

²⁹ MacKenzie, D.I., Nichols, J.D., Lachman, G.B., Droege, S., Royle, J.A., and Langtimm, C.A. 2002. Estimating site occupancy rates when detection probabilities are less than one. *Ecology*, 83(8): 2248 to 2255.

³⁰ van Winkel, D., Baling, M., and Hitchmough, R. (eds) 2018. *Reptiles and Amphibians of New Zealand: A Field Guide*. Auckland University Press.

period applied. No further monitoring beyond three years is proposed or, in my opinion, required.

Principle 8: Reporting

65. I agree that annual release site, pest control, and habitat performance results should be reported for the full monitoring period regardless of the number of lizards captured, and that all changes made under adaptive management should be recorded. The Lizard Management Plan has been updated accordingly.

Principle 9: Contingency actions

66. Mr Wedding submits that the Lizard Management Plan does not adequately address receiving site failure, declining post release detections, failure to meet pest control targets, or the capture of more copper skink than a receiving site can support. The PCC review raises a related concern, that further contingency options should be described for unexpectedly large numbers of lizards, unexpected species, and receiving site failure, and specifically queries the appropriateness of ceasing salvage after two consecutive days without capture.
67. I disagree that further contingency options are required. As already noted, the Lizard Management Plan has been updated so that three, rather than two, consecutive days of no captures are required before salvage will cease, directly addressing the PCC review's concern regarding variability in capture rates. The copper skink and northern grass skink release sites are, on average, two times larger than the impact sites and do not support a resident population. The amount of log stack refuge provided will increase in proportion to the number of lizards salvaged, and a suitable contingency release site, [REDACTED], has already been identified for all species potentially present, including any unexpected species. The receiving site management approach follows a method that has been repeatedly demonstrated as successful in the Wellington region. Three years of monitoring provides the opportunity for adaptive management to be applied should it be required. A decline in post release detections may simply reflect natural dispersal rather than failure. The receiving area allocated to copper skink is approximately 20 times larger than the confirmed impact area and adjoins high quality forest habitat within the QEII covenant. There is, accordingly, no realistic scenario in which more copper skink could be captured during salvage than this receiving environment is capable of supporting.

ADDITIONAL LIZARD MANAGEMENT PLAN MATTERS

68. Several further matters were raised regarding the staging of release site establishment, ongoing predator management, and pest control funding, which I address here.
69. On staging, experience at Lincolnshire Farm demonstrated that, within three months of retiring grazed grassland, grass length had grown sufficiently to provide protective cover for released lizards. A requirement that grassland at each release area be retired for a minimum of three months prior to salvage commencing has accordingly been included in the Lizard Management Plan. I agree, and the Lizard Management Plan already requires receiving sites to be functionally complete, including refuge installation, ground cover establishment, stock exclusion, and predator control lead in, before salvage begins within the corresponding construction stage, with the exception of native planting. The purpose of planting is to establish long term microhabitat heterogeneity rather than to provide immediate protective refuge, which is instead provided by retained long grass and log stacks from the outset. Planting will occur during the first planting season, May to September, following the grant of resource consent, and this detail has been included in the updated Lizard Management Plan.
70. On rodent control, I do not accept that the absence of a long term, landscape scale rat control programme renders the release sites unsuitable. The site already supports a range of mammalian predators, and the lizard species present are already tolerant of, and persist alongside, that predator community by virtue of the protective refuge provided by complex habitat structure. The Project increases the extent and quality of that protective refuge substantially.
71. The PCC review submits that the proposed \$2,000 contribution to a volunteer pest free group per species of arboreal lizard found during salvage or survey is a minimalist approach, that funding should instead be calculated according to the number of lizards released, and that a formal costed programme is required, including provision for contractor labour, and that bait stations should be spaced at 25 metre, rather than 50 metre, intervals to better target mice.
72. I disagree that per individual costing is more appropriate than per species costing for arboreal geckos. These are highly cryptic species with low detection probability, and a single confirmed detection is sufficient to justify establishing a dedicated management response for that species, irrespective of how many individuals are ultimately found.

73. I do not accept that a formal, contractor based costing programme is required. Pest control at [REDACTED] is undertaken by trained volunteers through Pest Free Plimmerton, not paid contractors, consistent with the established and successful community led model that has operated at this location since 2016. Requiring the Applicant to fund a parallel, contractor based programme would duplicate, and could undermine, that existing volunteer effort. The \$2,000 has, however, been informed by Pest Free Plimmerton's own operating costs, including trap purchase, an amount of approximately \$600 being sufficient to purchase 15 pet safe multi rodent traps of the type currently used by the group, with the balance available to support ongoing volunteer coordinated maintenance and monitoring.
74. I accept, in part, the recommendation regarding bait station spacing. Twenty five metre spacing is a reasonable and practicable requirement within the confined on site lizard release areas, given their limited size, and the Lizard Management Plan has been updated accordingly for those areas.

DURATION OF THE WILDLIFE AUTHORITY TERM

75. DOC recommends that the Wildlife Authority be granted for a maximum term of 10 years, rather than the 15 year term sought by the Applicant.³¹ I support DOC's recommended 10 year term. The lizard salvage itself will be completed within the first few years of the Project. A 15 year term is not required for the salvage and initial establishment phases of lizard management to be completed successfully. A 10 year term is sufficient both for the relocated populations to establish self sustaining communities, consistent with the timeframes for sexual maturity and monitoring addressed above, and for the created habitat areas to mature, and it is also the appropriate period over which the community led predator management model described above could be established. I therefore agree with DOC's position on this matter, and consider a 10 year term to be appropriate and sufficient.

BIODIVERSITY OFFSET AND THE NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

76. DOC's draft condition 2(j) would require a biodiversity offset at a minimum ratio of two to one, informed by a quantitative loss and gain calculation, or, where an offset cannot be secured, would require avoidance of the activity giving rise to the residual effect.³²

³¹ DOC report provided under section 51(2)(c) of the Fast track Approvals Act 2024 for FTAA 2603 1181, dated 17 July 2026, at paragraph 6.12.

³² DOC report provided under section 51(2)(c) of the Fast track Approvals Act 2024 for FTAA 2603 1181, dated 17 July 2026, Appendix B, draft condition 2(j).

77. In my opinion, this condition is not needed, because no significant residual adverse effect exists that requires offsetting. Applying the effects management hierarchy under the NPS IB, avoidance of the small grass fragment at Area 8 is not practicable or required, given its isolated location and the Low level of effect involved. The effect has, however, been substantially minimised through salvage, and further remedied through the advance creation and enhancement of copper skink habitat well in excess of the area affected, delivered before the effect occurs rather than after it. Taking these measures into account, the residual adverse effect on copper skink is, in my opinion, less than minor. Where the residual adverse effect is less than minor, the effects management hierarchy does not require a further offset or compensation response.
78. In any event, and without accepting that an offset is required, the Project already achieves a ratio of habitat creation and enhancement to impacted habitat in excess of three to one, comfortably exceeding the two to one minimum ratio proposed in draft condition 2(j). The condition's fallback requirement, that the activity be avoided where an offset cannot be secured, accordingly has no application here, since an offset exceeding the proposed minimum ratio has already been secured through the Project's own design.

ANIMAL WELFARE AND EUTHANASIA PROVISIONS

79. DOC's section 51 report recommends that information on animal ethics approvals and requirements be provided to support the proposed lizard management measures.
80. My understanding is that Animal Ethics Committee approval under the Animal Welfare Act 1999 is required for the use of animals in research, testing, or teaching. It is not required for the handling, salvage, or translocation of lizards carried out under a Wildlife Act 1953 authority for the purposes of species management and conservation mitigation, which is the basis on which all lizard management activities for this Project will undertaken.
81. I have, however, incorporated a specific provision addressing the humane euthanasia of lizards in care, consistent with section 11 of the Animal Welfare Act 1999. The following provision has been incorporated into the Lizard Management Plan:
82. *"In accordance with the Animal Welfare Act 1999, section 11, the Authority Holder may euthanise lizards in their care if the wildlife is:*
- (a) *Suffering unreasonable or unnecessary pain or distress; and*

- (b) *Is seriously ill or permanently injured and unlikely to survive in the wild; and*
- (c) *The Authority Holder's appointed Herpetologist has the skills to humanely euthanise."*

FURTHER MATTERS RAISED IN THE SECTION 51 REPORT

Paragraph 8.8.2: extent of habitat identified by the April 2026 survey

- 83. DOC's section 51 report suggests that the April 2026 survey found lizard species beyond the areas previously assumed to support lizards, supporting a concern that habitat extent has been underestimated. I do not agree with this characterisation. The survey confirmed lizards within areas of potential habitat that had already been identified and assessed within the Lizard Management Plan, at an order of magnitude consistent with what had been anticipated prior to the survey. The survey results do not identify any area of potential habitat beyond what had previously been assumed. If anything, the results confirm the original assessment was, if anything, conservative rather than an underestimate.

Paragraph 8.8.3: further recommended information

- 84. DOC recommends that management triggers for unexpectedly high lizard values be incorporated into the Lizard Management Plan. This has been done, with additional habitat enhancement and predator control scaled to the number of lizards recorded during salvage.
- 85. DOC recommends that further information be provided regarding indirect effects, including the potential impact of increased housing density on adjacent lizard habitat values. In my opinion, no further information is required. The assessment already adopts a precautionary approach, assuming that all forest associated lizard species known within the region are potentially present within the adjacent forest environment. Indirect effects have been further addressed in the July 2026 memorandum through the addition of cat trapping, which has been extended to all lizard release sites, and through the creation of complex habitat that, together with these species' demonstrated tolerance of mammalian predators, will support persistence without the need for landscape scale predator control in perpetuity.
- 86. DOC recommends that further information be provided to substantiate the claim that the Project will result in an increase in protected lizard habitat of higher ecological value. In

my opinion, no further information is required. The Project retires grazed farmland that does not currently provide lizard habitat, thereby increasing the extent of habitat available locally. The survey results, and the established habitat preferences of both northern grass skink and copper skink, confirm that these species favour dense grassland mosaics of the kind the Project will create. Retiring grazing, constructing log stacks, and planting approximately 20 percent of each release area in native shrubs will establish a dense grass and shrubland mosaic that will, over time, mature into a mix of gorse (*Ulex europaeus*), dense grass, mānuka (*Leptospermum scoparium*), and tauhinu (*Ozothamnus leptophyllus*), a habitat type demonstrably preferred by both target species.

87. I confirm that the management approach outlined in the Lizard Management Plan, as amended by the changes described in this evidence, provides an appropriate and proportionate response to the effects of the Project on lizards, and is consistent with the purposes of the Wildlife Act 1953 and the Fast track Approvals Act 2024.

CONCLUSION

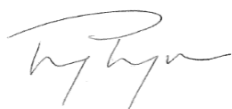
88. My overall assessment is that the Lizard Assessment and Lizard Management Plan for the Mt Welcome project, as amended by the changes described in this evidence, are technically robust, prepared in accordance with best practice guidance, and proportionate to the scale and nature of the effects involved. The key positions I maintain in this evidence are:

- (a) High, rather than Very High, is the appropriate regional ecological value for copper skink, given the instability of the regional threat classification and lack of consideration of recent scientific information about the species, copper skink's At Risk national status and Least Concern IUCN status, and its wide distribution and locally high densities within the Ecological District.
- (b) The actual area of habitat affected by the Project is approximately 3,500 m², not the in excess of 3 ha asserted by Mr Wedding, and the pre mitigation magnitude of effect on copper skink is properly assessed as Low.
- (c) Magnitude of effect has been assessed at the same scale as ecological value throughout this evidence, consistent with the EIANZ advisory note on scale, whereas Mr Wedding's Very High magnitude conclusion improperly reverts to a site specific, single population scale after first invoking the wider Ecological District as the relevant context and mischaracterising the extent of impacted habitat.

- (d) The Low value classification applied to Area 8 is empirically justified by the confined size and structural context of this grass fragment, and is supported by the consistent absence of lizards from the adjoining pine forest margin, consistent with another independent survey within the adjacent property at Muri Road, and by four further site visits undertaken between 2019 and 2025 that recorded no lizards outside the confirmed locations.
- (e) The Project delivers a net increase in the extent and quality of copper skink and northern grass skink habitat exceeding a ratio of three to one relative to the area affected, secured and substantially delivered in advance of the effect occurring.
- (f) The nine DOC Lizard Technical Advisory Group principles are appropriately addressed, including through amendments made to the Lizard Management Plan to extend device checking to five days with three consecutive suitable days without capture, add three nights of spotlighting, revise release area allocations for copper skink, and further reporting requirements.
- (g) [REDACTED], and the on site release areas, provide adequate carrying capacity for all species proposed to be included within the wildlife approval, consistent with DOC's own prior acceptance of this receiving environment under Wildlife Act Authorities 117207 FAU and 111140 FAU.
- (h) Three years of post release monitoring, triggered at a capture threshold of 20 individuals, is scientifically appropriate, and monitoring smaller numbers of animals would risk unreliable conclusions given the imperfect detectability inherent in surveying cryptic species at low sample sizes.
- (i) A 10 year Wildlife Authority term, consistent with DOC's recommendation, is sufficient for salvage completion, population establishment, habitat maturation, and the potential establishment of a community led predator management programme.
- (j) No biodiversity offset is required, because the residual adverse effect on lizards, following avoidance where practicable, minimisation, and remedy, is less than minor. In any event, the Project's habitat creation and enhancement ratio of more than three to one already exceeds the two to one minimum ratio proposed in draft condition 2(j).
- (k) Animal Ethics Committee approval is not required for the proposed lizard management measures, and the Lizard Management Plan has been updated to

include an express euthanasia provision consistent with section 11 of the Animal Welfare Act 1999.

89. The Lizard Management Plan has been updated to reflect the following changes described in this evidence:
- (a) Salvage effort: minimum five days of device checks, with three consecutive suitable days of no captures required before salvage can conclude (rather than two).
 - (b) Spotlighting: increased to a minimum of three nights.
 - (c) Release site allocation: all copper skink to be released into Release Area 1, with two dedicated log stacks for this species in addition to those provided for northern grass skink, plus one additional log stack per ten animals if more than 20 copper skink are captured.
 - (d) Predator control: cat trapping measures extended across all terrestrial release areas (not just the QEII forest margin); bait station spacing reduced to 25 metres within the confined on-site lizard release areas.
 - (e) Staging: grassland at each release area to be retired for a minimum of three months before salvage commences; native planting to occur in the first planting season (May to September) following grant of consent.
 - (f) Contingency: three, rather than two, consecutive days of no captures required before salvage ceases.
 - (g) Reporting: annual release site, pest control, and habitat performance results to be reported for the full monitoring period regardless of capture numbers, with all adaptive management changes recorded.
 - (h) Animal welfare: express euthanasia provision incorporated, consistent with section 11 of the Animal Welfare Act 1999.
90. I confirm that the management approach outlined in the Lizard Management Plan, as amended by the changes described in this evidence, provides an appropriate and proportionate response to the effects of the Project on lizards, and is consistent with the purposes of the Wildlife Act 1953 and the Fast-track Approvals Act 2024.



Tony Michael Payne
Blueprint Ecology Limited

7 August 2026