

Under the **FAST-TRACK APPROVALS ACT 2024**

In the matter of an application by Wellington International Airport Limited for approvals for the Southern Seawall Renewal Project

By **WELLINGTON INTERNATIONAL AIRPORT LIMITED**
Applicant

**STATEMENT OF EVIDENCE OF CHRISTOPHER JAMES WEDDING AND
MICHAEL GARETH ANDERSON (TERRESTRIAL ECOLOGY) ON BEHALF OF
WELLINGTON INTERNATIONAL AIRPORT LIMITED**

17 March 2026

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INTRODUCTION

1. Our full names are **Christopher James Wedding** and **Michael Gareth Anderson**.
2. Our evidence is given on behalf of Wellington International Airport (**WIAL**) in respect of WIAL's proposed Southern Seawall Renewal project (**Project**) in response to comments made under section 53 of the Fast-track Approvals Act 2024 (**Act**) by:
 - (a) Wellington Regional Council (**GWRC**);
 - (b) Department of Conservation (**DOC**);
 - (c) Wellington City Council (**WCC**); and
 - (d) Guardians of the Bays Incorporated (**GOTB**).
3. We prepared and reviewed the ecology technical reports with our co-authors¹; Bioresearches – Southern Seawall Renewal Project Terrestrial and Freshwater Ecological Impact Assessment (**Technical Assessment**) included in Part B of the Application, as well as the Lizard Management Plan (**LMP**) and Avifauna Management Plan (**AMP**) included in Part G of the Application.² Our qualifications and experience are set out in Appendix E of our Technical Assessment.³

Code of conduct

4. We confirm that we have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and have complied with it in preparing this evidence. In particular, unless we state otherwise, the issues addressed in my evidence are within our area of expertise and we have not omitted to consider material facts known to me that might alter or detract from the opinions we express.

¹ Michaela Scarrott, B.Sc., Treffery Barnett, M.Sc.

² An updated version of the Avifauna Management Plan was provided to the Panel on 30 January 2026, [link](#).

³ https://www.fasttrack.govt.nz/_data/assets/pdf_file/0024/14478/G.07-Bioresearches-Lizard-Management-Plan.pdf and https://www.fasttrack.govt.nz/_data/assets/pdf_file/0018/14427/B.10-Bioresearches-Ecological-Impact-Assessment.pdf. Mr Wedding and Dr Anderson also co-authored the Bioresearches – Southern Sea Defences Renewal Project Residual Effects Analysis Report: Kororā: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/14429/B.12-Bioresearches-Residual-Effects-Assessment-Report.pdf.

GWRC SECTION 53 COMMENTS

Ensuring the effectiveness of proposed offsetting for pohowera habitat loss

5. In its section 53 comments, GWRC expresses concern that construction of the Southern Seawall will result in the loss of existing pohowera (banded dotterel) habitat for up to three breeding pairs.
6. GWRC disagrees with our view that the adverse effects will be no more than minor, and considers the loss of pohowera habitat will have more than minor adverse effects for the duration of seawall construction.
7. Under GWRC's Natural Resources Plan (**NRP**) and the New Zealand Coastal Policy Statement 2010 (**NZCPS**), more than minor residual effects must be addressed through biodiversity offsetting in accordance with Schedule G2 of the NRP. GWRC contends that the effects management measures proposed for pohowera therefore, need to be treated as an offset.
8. GWRC considers WIAL's approach is consistent with most but not all of the principles for biodiversity offsetting in Schedule G2. In particular, GWRC considers that the conditions proposed by WIAL do not provide reasonable certainty that the long-term outcomes intended to be achieved by the proposed offsetting will be achieved.
9. GWRC therefore considers that the proposed consent conditions should be amended to provide for targets, monitoring, and the potential for adaptive management, consistent with Principle 5(b) in Schedule G2 of the NRP, including:
 - (a) a new condition that sets the target habitat uptake for pohowera. The target would be the same as the habitat lost (habitat for 3 unique breeding pairs;
 - (b) a new condition that provides for annual monitoring of pohowera habitat uptake;
 - (c) if monitoring demonstrates that the target habitat uptake is not met, a new condition that requires the consent holder to investigate the reasons that the target has not been met and set out actions that the Consent Holder will undertake in order to meet the target; and

- (d) a condition that provides for monitoring and reporting to cease when the construction of the Southern Seawall and Eastern Bank Remediation area has ceased.
10. As stated in the Technical Assessment, we concluded that the potential adverse effects of the Project on pohowera are low in magnitude, giving consideration to:
- (a) historic and existing use of the airfield during the breeding season;
 - (b) the measures we have recommended to avoid disturbance to nesting birds;
 - (c) reinstatement of pohowera habitat following construction; and
 - (d) a low level of effect does not generally require biodiversity offsetting.
11. Additionally, our conclusions were reached despite very conservative estimates that up to three breeding pairs of pohowera could potentially utilise the Moa Point works area during the breeding season. Despite this, we have only observed one pair within the works site at any time during the 2024/2025 and 2025/2026 breeding seasons and our observations are more likely to reflect actual seasonal use of the works area. Our assessment is therefore that the works area represents a small component of the wider habitat available within the airport environment, and that the adjacent airfield would support additional breeding territories.⁴
12. We have recommended a management approach in the conditions and AMP, based primarily on avoidance and deterrence of nesting, by establishing construction yards from February to June, ahead of the breeding season. Key measures include deterring nesting within the works area prior to and during the breeding season, undertaking pre-construction nest surveys, establishing exclusion zones around any nests, and monitoring breeding activity during the breeding season.
13. Where breeding occurs elsewhere within Airport grassland habitats, pohowera use airfield habitat that is already enhanced by WIAL with long-term pest control (mammals and predatory birds (e.g. black-backed gulls)), thereby providing safe breeding and roosting grounds which have contributed significantly to the existing pohowera population at Wellington's South Coast to date. These measures address the potential temporary

⁴ Section 5.2.2.1 of Bioreserches Technical Assessment.

displacement of birds from the works area while safeguarding breeding opportunities elsewhere on the Airport.

14. Our assessment is that the anticipated effects are temporary and of low magnitude, and potential displacement effects on one to two pairs (but up to three) are appropriately mitigated because the proposed measures avoid direct impacts on breeding attempts, and there is available safe habitat elsewhere, as provided by WIAL. We conclude that there are no residual adverse effects requiring biodiversity offsetting or compensation. As such, the suggested monitoring and targets are not required.
15. For completeness, we add that GWRC's proposed 'target' requiring WIAL to demonstrate that the Airport grassland habitat is used by '*at least 3 additional breeding pairs*' of pohowera each year (GWRC's proposed ECO.26 and ECO.29) ignores our evidence recording that the habitat that will be impacted by the Project is used by *up to* three breeding pairs (noting our recent actual observations recorded only one breeding pair). It is not clear why GWRC proposed a firm '*at least 3 additional breeding pairs*' target, especially as their proposed ECO.26 directly records that the habitat impacted provides for '*up to 3 pairs of pohowera*'. If an offset approach was necessary – which, again, we do not consider to be the case – then the '*at least 3 additional breeding pairs*' of pohowera would not be appropriate.
16. We further note that DOC has not raised any concerns with our recommended approach to mitigation, other than questioning the necessity of our proposal to provide additional nest protection for breeding birds within the airfield (which we address below).

DOC SECTION 51 REPORT AND SECTION 53 COMMENTS

17. DOC's section 51 report and section 53 comments express overall comfort with our assessment of effects on terrestrial ecology values, and the effects management measures we have proposed and that are reflected in the conditions and management plans. DOC do raise a small number of matters in respect of lizards and pohowera, which we respond to below.

Lizards

18. Overall, DOC's section 51 report concluded:⁵

⁵ DOC's section 53 comments dated 10 March 2026 effectively repeat the recommendations from the section 51 report.

- (a) the survey and Lizard Management Plan (**LMP**) prepared by Bioreserches was consistent with DOC guidelines for lizard salvage and management;
 - (b) the survey methods are appropriate, with two Not Threatened species — Northern grass skink (*Oligosoma polychroma*) and Raukawa gecko (*Woodworthia maculata*) — detected;
 - (c) the overall level of effect has been appropriately assessed as very low; and
 - (d) the proposed conditions are generally appropriate.
19. While supportive overall, DOC provided specific comments in the report for WIAL to consider:
- (a) DOC supports the inclusion of the Accidental Discovery Protocol, but notes it is described only at a high level. DOC recommends it be further detailed to ensure clarity for contractors.
 - (b) DOC considers the Moa Point release site as suitable habitat, but notes that formal WCC approval must be secured to enable release to occur in that location.
 - (c) DOC supports the adaptive monitoring framework but recommends defining clear triggers for when monitoring results constitute 'failure' rather than 'inconclusive', particularly where large numbers of lizards are salvaged.
 - (d) DOC notes the 2025 Threats Assessment has replaced the category At Risk – Relict with At Risk – Uncommon and recommends updating the classification for Northern spotted skink (*O. kokowai*) accordingly.
 - (e) DOC recommends further refinement of contingency actions where significant numbers of lizards are salvaged but not subsequently detected, to ensure monitoring outcomes are linked to clear management responses.
20. In our Technical Assessment, we concluded that lizard habitat within the project footprint is of low value at the Miramar Golf Course Yard and moderate value at Moa Point Yard, with the magnitude of habitat loss assessed as negligible to low. DOC acknowledges that assessment and conclusion, and in their section 51 report record that "*Given the low*

numbers of detected animals and their status as Not Threatened, DOC agrees that the overall level of effect has been appropriately assessed as low".

21. Accordingly, the overall level of ecological effect on lizards is considered very low once mitigation measures (capture-relocation, habitat remediation following construction and habitat restoration at the relocation site) are implemented.
22. The proposed LMP provides a mitigation-based approach that includes pre-clearance trapping, systematic and destructive searches, salvage and relocation of any lizards encountered by a qualified herpetologist, and relocation to suitable receiving habitats. Habitat enhancement measures, including supplementary refuges, restoration planting and pest control at release sites, are also provided where required, together with post-relocation monitoring and contingency measures if monitoring indicates additional management is necessary.
23. Given the limited extent and relatively low ecological value of the affected habitats, together with the implementation of these mitigation measures, the Project is not expected to adversely affect the viability of local lizard populations. We consider the proposed management framework is therefore appropriate to manage the identified effects and to support the wildlife authorisation sought under the Fast-track Approvals Act 2024, and do not consider that specific updates to the LMP or proposed conditions are necessary.

Avifauna

24. DOC expressed support for the AMP, and considered the measures contained in the plan generally appropriate.
25. DOC's sole concern was the use of nest cages as a measure to support pohowera breeding at the Airport grassland site. DOC considers nesting cages to be unreliable for protecting nesting birds. If WIAL deemed existing predator control insufficient, DOC suggested increasing its scale or intensity rather than using cages.
26. We have discussed this directly with DOC and have amended the AMP to remove the use of nest cages.

27. With the removal of nest cages and the adoption of an avoidance-based management approach supported by DOC, the proposed measures are considered appropriate to manage potential effects on pohowera during construction.

WCC SECTION 53 COMMENTS

Issue

28. WCC's section 53 comments indicate general comfort in respect of terrestrial ecological values, effects and effects management.
29. WCC requested clarification around the provision of information and operational process for works on Council reserve land.
30. The Project team is comfortable providing advance notification to Council of these activities.
31. We agree that would be appropriate (and is standard practice). However, this is considered a landowner access issue that can be addressed through ongoing coordination with WCC during implementation of the LMP and associated restoration works. We would not usually expect to see a specific consent condition requiring notification of WCC as landowner.

GOTB SECTION 53 COMMENTS

Lizards

32. GOTB expressed support for the identification and removal of lizards to a safe location as proposed in the LMP.
33. While supportive overall, GOTB recommended two amendments to the LMP for WIAL to consider:
- (a) undertaking cat control and engagement with the local community on their domestic cats; and
 - (b) a monitoring programme to assess lizard presence and population response.
34. The LMP adopts a mitigation-based approach focused on salvage and relocation of lizards from the construction footprint, together with habitat enhancement at receiving sites. Given the low to moderate ecological value of the affected habitats, the limited and temporary scale of habitat

loss, and overall very low level of effect, these measures are considered sufficient to manage the effects of the Project.

35. The additional monitoring suggested by GOTB is not considered necessary in this case. The mitigation measures proposed in the LMP are proportionate to the level of ecological effect identified in the Technical Assessment and are considered adequate to manage potential impacts on local lizard populations.
36. Cat control is not proposed as part of the LMP. While predator control can provide ecological benefits in some circumstances, it is not considered necessary for the success of the proposed lizard salvage and relocation programme. The lizard species present at the site, including northern grass skink, are widespread and commonly occur in modified environments where cats are also present. Native lizards are already visually abundant in the surrounding environment,⁶ and with habitat remediation and additional restoration, a very low level effect is expected for native lizards for this Project.

Avifauna

37. GOTB recommended a single 50-metre setback distance from the point at which birds or chicks are identified to apply to all nesting birds, coastal and terrestrial.
38. The AMP already specifies buffer distances for species with the potential to breed within or adjacent to the Project area, and these are tailored to species ecology and nesting behaviour.⁷
39. For coastal species, a 50 m exclusion zone is specified for both banded dotterel and variable oystercatcher, which were the only species identified as likely to breed within the coastal construction area.
40. For other native birds, species-specific setbacks are provided where relevant. A buffer of 50–100 m is recommended for New Zealand falcon (kārearea), reflecting the higher sensitivity of this species during nesting, while a 20 m setback applies to forest birds nesting in trees or shrubs. GOTB's comments acknowledge that a larger setback distance is typically applied for kārearea / New Zealand falcon.

⁶ Section 4.1.6.2, Bioresearches Technical Assessment.

⁷ The proposed conditions of consent refer to the setbacks at ECO.27 – ECO.28.

41. This species-specific approach is consistent with best practice and applies a commensurate buffer to the level of potential disturbance, as disturbance sensitivity and nesting ecology vary considerably among bird groups. The application of buffers would be informed by the Project Ornithologist following survey and monitoring and communicated to Project contractors.
42. It is also noted that all native bird species are protected under the Wildlife Act 1953. If additional species not previously identified are found to be breeding within the Project area, their nests, eggs and chicks cannot be disturbed. In such circumstances, appropriate protection measures, including temporary exclusion zones and consultation with the Project Ornithologist, would be implemented to ensure compliance with the Wildlife Act and the objectives of the AMP. We have added a specific accidental discovery protocol to the AMP to clarify this point.

Christopher James Wedding and Michael Gareth Anderson

17 March 2026