

Your Comment on the Mt Welcome project application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email at substantive@fastrack.govt.nz

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation		
First name	Terry		
Last name	Calmeyer		
Postal address	PO Box 10420, Wellington 6140		
Mobile phone		Work phone	
Email	fast-track@doc.govt.nz and		

2. We will email you draft conditions of consent for your comment			
X	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct

3. Please provide your comments on this application
Please find comments attached



Linda Kirk
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 31/07/2026

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Comments on a fast-track consenting application

Fast-track Approvals Act 2024 section 53

To: The Expert Panel

From: Department of Conservation

Regarding fast-track project: Mt Welcome, Pukerua Pay, Porirua Project

Fast track Reference: FTAA-2603-1181

1 Overview

- 1.1 Pukekura Property Group Limited Partnership (the Applicant) lodged a substantive application with the Environmental Protection Authority (EPA) proposing to establish in stages a 949 lot subdivision, a commercial centre, and associated infrastructure. This includes a water reservoir, wastewater storage facilities, roading and improved pedestrian and cycle trails to Pukekura Bay Village.
- 1.2 The Project does not take place on any Public Conservation Land ('PCL').
- 1.3 Prior to the lodgement of substantive application, the Applicant undertook consultation with the Department, providing the opportunity to review and provide comments on the draft ecological values, effects and effects management report, the draft Lizard Management Plan and the draft Wildlife Approval Assessment: Lizards Mt Welcome, Pukerua Bay all dated 24 October 2025. A summary of consultation detailing DOC's comments was provided to the applicant in November 2025.
- 1.4 In accordance with sections 53(2)(k) and 53(2)(m)(i) of the Act, the Director-General of Conservation (D-G) has been invited to comment on the substantive application. Statutory delegations are in place for the Department of Conservation (DOC / the Department) to provide commentary on behalf of the D-G.

2 Department of Conservation advice

- 2.1 DOC has provided these comments on the Project in relation to flora and ecosystems, lizards and freshwater values.
- 2.2 Overall, DOC has concerns about the assessment provided for lizards, significant indigenous vegetation and significant habitats of indigenous fauna (and indigenous biodiversity outside

of SNAs), freshwater values (both wetlands and streams) and the effects management approach for managing the effects associated with Project.

- 2.3 In preparing these comments, DOC has relied on the technical expertise of Tayla Hooker (Flora and Ecosystems), Chris Wedding (Lizards), and Dr Kathryn Collins (Freshwater). The credentials and statements of evidence of these experts are provided in Appendix A-C.
- 2.4 Prior to the lodgement of these comments, DOC and Greater Wellington Regional Council (GWRC) undertook some informal and helpful discussions in relation to the freshwater aspects of the Project. In good faith, GWRC provided DOC with copies of their technical comments, which DOC's technical experts have reviewed. Overall, DOC considers there is strong alignment between the views of GWRC's, and DOC's technical experts.

3 Assessment

- 3.1 DOC's assessment has been confined to actual and potential ecological effects of the proposal and the proposed consent conditions that will manage ecology effects and minimise harm to indigenous biodiversity and freshwater values. Accordingly, DOC has not commented on its consistency with the wider statutory framework.
- 3.2 Notwithstanding the above, DOC has provided an assessment against the relevant planning framework¹ in relation to the site access and the proposed roundabout on State Highway 59, as it considers that this provides clear direction to the Panel that there are practicable alternatives available for consideration².
- 3.3 In the paragraphs below, DOC has provided high level comments and recommendations on the proposed consent conditions. However, given the information gaps and issues identified in expert statements, DOC has not proposed new or amended track-changed conditions. In accordance with the direction set out Minute 5 of the Panel, it is anticipated that expert conferencing is intended to take place between the experts³ and DOC would seek to be included in any discussions on draft conditions for not just the conservation approvals but also the resource consent related conditions.
- 3.4 DOC also understands it will be invited to provide comments on consent conditions under section 70 of the FTAA and will therefore provide track-changed amendments at that stage of the FTAA process, unless the Panel directs otherwise.

4 Comments on Actual and Potential Effects

Site access/State Highway 59 intersection form

- 4.1 DOC has reviewed the proposed roundabout to be installed at the State High 59 intersection with the site, to allow for road access to the Project. In Minute 4, the Panel requested the

¹ Set out below in paragraph 4.4.

² Refer to paragraphs 4.1-4.3

³ Minute 5 of the Expert Panel, page 2, para [8].

Applicant to confirm whether it would be feasible to construct a realigned section of the stream to the west of the proposed roundabout to eliminate the need for a culvert⁴. It is understood the Applicant does not support the proposed alternative, as it would materially increase the earthworks and SNA vegetation clearance, and would result in greater uncertainty about rehabilitation and offsetting⁵. Overall, the Department's view on the site access is that a diversion of the Taupo catchment is preferred to reclamation and culverting from a freshwater perspective⁶. However, the effects of indigenous vegetation clearance within the SNA's would materially affect indigenous biodiversity values within those areas⁷.

- 4.2 The Integrated Transport Assessment (the ITA) set out in Appendix 14 of the second substantive application outlines alternative options discussed between the Applicant and NZTA, including a signalised intersection. The Applicant records that NZTA does not consider traffic signals are appropriate from a safety perspective under the current high-speed highway conditions, including though lower speed limit in the future⁸.
- 4.3 DOC considers that a signalised intersection may represent the most appropriate option, as it appears capable of avoiding direct adverse effects on the Taupo catchment from both freshwater and terrestrial perspectives. DOC recommends that the Panel request's further information from the Applicant and NZTA setting out the alternative access options considered, including a detailed assessment of the feasibility of a signalised intersection.
- 4.4 The reasons for DOC's recommendation to the Panel are based on the direction set out in the relevant planning framework, which is as follows:
 - 4.4.1 Section 6(a) of the Resource Management Act 1991 (the RMA), which requires the recognition and provision for the preservation of wetlands, and lakes, and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development;
 - 4.4.2 Section 6(c) of the RMA which requires the recognition and provision for the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna;
 - 4.4.3 Section 7(d) of the RMA which requires particular regard to the intrinsic values of ecosystems;
 - 4.4.4 Policy 7 of the National Policy Statement for Freshwater Management 2020 (Amended December 2025) (NPS-FM), which sets out that the loss of river extent and values is avoided to the extent practicable;

⁴ Minute 4 of the Expert Panel, Request for Further Information, Mt Welcome, Pukerua Bay, Porirua, para [4].

⁵ Response to Panel Minute 4, 17 July 2026, page 7, para [24].

⁶ Statement of Evidence, Dr Collins, para [30].

⁷ Statement of Evidence, Ms Hooker, para [39].

⁸ Appendix 14 – Integrated Transport Assessment, 18 December 2025, page 30.

- 4.4.5 Policy 9 of the NPS-FM which requires the habitats of indigenous freshwater species are protected;
- 4.4.6 Policy 3 of the National Policy Statement for Indigenous Biodiversity 2023 (Amended December 2025) (NPS-IB) which requires a precautionary approach is adopted when considering adverse effects on indigenous biodiversity;
- 4.4.7 Policy 7 of the NPS-IB which states that SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development;
- 4.4.8 Regulation 57 of the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-F) which provides for the reclamation of the bed of any river as a discretionary activity. Noting a resource consent under this regulation must not be granted unless the decision maker has first, (a) satisfied itself there is a functional need for the reclamation of the riverbed in that location, and (b) applied the effects management hierarchy;
- 4.4.9 Policy 110 of the Greater Wellington Natural Resources Plan (NRP), particularly Policy 110(ii)(3) which requires the loss of extent and values of beds of lakes and rivers and natural wetlands, including as a result of reclamation and draining is avoided, except where there is a functional need the specified infrastructure in that location.
- 4.4.10 DOC considers clause (a) of regulation 57 of the NES-F and Policy 110 of the NRP to be of particular importance. The National Planning Standards 2019 define “functional need as *“the need for a proposal or activity to traverse, locate or operate in a particular environment because the activity can only occur in that environment”*”.
- 4.4.11 Based on the options identified in the ITA (and noted above), and the limited consideration given to the signalised intersection option. DOC is not satisfied that functional need for reclamation of the Taupo catchment has been demonstrated. On the information currently available, there appears to be practicable alternatives, including a signalised intersection, that warrant further assessment.

Resource Consent Conditions:

- 4.5 Securing the effects management package proposed in the substantive application and technical reports relies heavily on management plans. The use of management plans is common and lawful, provided they do not defer or delegate substantive decision-making. Rather, management plans should set out the administrative and operational detail necessary to implement the objectives and performance standards established by the conditions. This approach is set out at s 21 of the July 2025 Panel Convener’s Practice and Procedure Guidance Document⁹ which goes on to encourages the use of the following other condition mechanisms that may provide greater certainty:

⁹ Panel-conveners-practice-and-procedure-guidance.pdf

- (a) *Performance or environmental standards that specify that standard that must not be breached;*
- (b) *Trigger responses that provide for resource use to occur provided specified environmental conditions exist;*
- (c) *Monitoring of triggers and responses, including adaptive management responses;*
- (d) *Plan design standards, which require the management plan to be prepared in accordance with a specific industry accepted standard or plan;*
- (e) *Certification by a specifically qualified and experienced person;*
- (f) *Determination of the certifier's qualifications and experience (for proposals with particularly significant potential adverse effects)*
- (g) *As-built certification requirements to ensure that the project meets the required standards;*
- (h) *Mandatory implementation of the management plan; and*
- (i) *Local authority monitoring requirements associated with the proposed condition set.*

4.6 Based on the above and principles developed RMA case law, DOC is of the view that conditions of consent must specify clear environmental outcomes and objectives for management plans. Conditions of consent should provide acceptable levels of performance standards (for example, monitoring parameters). The purpose of a management plan is to specify how objectives specified in the conditions will be met. In addition, management plans should include a methodology of how acceptable environmental limits are to be achieved.

4.7 The proposed resource consent conditions fall short of using these good practice methods, particularly the format, that include mechanisms a-i above. For example, conditions 40-48 of the proposed district consents conditions package manage effects on lizards and birds, however, the effects on lizards and birds should also be considered within their individual management plan.

4.8 In addition, DOC also notes the applicant has not provided a Wetland Management Plan in relation offsetting and compensation set out in the Ecological Assessment. DOC recommends the Panel request the Applicant to provide conditions for wetlands in accordance with a-i above, as well as a draft wetland management plan.

Terrestrial Ecology:

4.9 In this section, DOC's comments relate to the terrestrial ecology aspects of the Project more specifically, effects on terrestrial flora and ecosystems, lizards, and bats.

Terrestrial flora and ecosystems:

Value of indigenous vegetation:

- 4.10 The Ecological Assessment assigns SNA027 with a moderate ecological value¹⁰. In relation to SNA029, the Applicant does not directly assign an ecological value but instead concludes the SNA does not meet the ecological significance criteria, as it is not representative given it is largely weed species, does not contain any rarity or diversity, nor any ecological function¹¹.
- 4.11 Ms Hooker has undertaken an ecological significance assessment of the areas of indigenous vegetation set out in the Ecological Assessment. In relation to SNA027, Ms Hooker assigns these with very high ecological value, and the indigenous vegetation described east of SH59 outside of the SNAs as moderate to high¹².
- 4.12 Ms Hooker does not agree with the conclusion reached for SNA029 as she notes that while the area contains some weed components it also contains other indigenous vegetation. It is also important to note the wider extent of SNA029 contains representative kohekohe-tawa forest. It is also considered that the indigenous vegetation found in this area also meets criteria for rarity and distinctiveness as the SNA is situated on acutely threatened land environments (LENZ), which have less than 10% indigenous vegetation remaining nationally. Hence, Ms Hooker considers SNA029 to be of very high ecological value¹³.

Vegetation clearance within SNAs:

- 4.13 The Applicant proposes to clear 1,400m² (0.14ha) of indigenous vegetation within SNA027 and the edge of SNA029 for the construction of the proposed roundabout along State Highway 59. The Ecological Assessment assigns the magnitude of effect within SNA027 to be of negligible effect on the eastern side of SH59.
- 4.14 DOC considers it is unclear the amount of area lost in eastern side of SH59 as the applicant has only equated indigenous vegetation loss with the extent of SNA027. Ms Hooker has mapped this area using the information provided in Figure 16 of the Ecological Assessment and is of the view the total loss of vegetation ranges from 0.4ha-1ha rather than 0.14ha as detailed by the Applicant.
- 4.15 Within the Wildlands peer review of the Ecological Assessment, Wildlands does not agree with the proposed clearance within SNA027, which the Applicant states include 0.14ha of clearance¹⁴. Ms Hooker agrees with Wildlands assessment and considers the clearance within SNA027 equates to 0.2 to 0.3 ha.
- 4.16 The Applicant proposes to offset the effects within SNA027 at a ratio of 3:1, equating to an area of 4,200m² (0.42ha).

¹⁰ Appendix 15 – Ecological Assessment, page 33, section 4.1.

¹¹ Appendix 15 – Ecological Assessment, page 32

¹² Statement of Evidence, Ms Hooker, para [31]. 9

¹³ Statement of Evidence, Tayla Hooker, para [30, 32-35].

¹⁴ Wildlands Consultants, Ecological Review and Request for Further Information, section 4.1.2, pages 2-3.

- 4.17 DOC notes the Applicant has not provided an offset model but instead recommends a ratio of 3:1 based on other projects¹⁵. Ms Hooker does not support this approach and recommends the use of an offset model, particularly DOC's Biodiversity Offsets Accounting Model (BOAM), which is considered as best-practice for offsetting in terrestrial environments¹⁶. In terms of the clearance within SNA027. Ms Hooker advises the BOAM model should be used with a magnitude of impact as very high.¹⁷
- 4.18 DOC is concerned with the time-lag associated with the vegetation within SNA027. Ms Hooker is of the opinion that given that the area is 60-years old, there will be a significant time-lag in what indigenous area is lost to what will be gained, which would likely result in a significantly larger area required to be offset than a 3:1 ratio proposed¹⁸.
- 4.19 Principle 8 of Appendix 3 of the NPS-IB requires that the delay between loss of, or effects on, indigenous biodiversity values at the impact site and the gain or maturity of indigenous biodiversity at the offset site is minimised. DOC considers that if the time-lag cannot be minimised, the compensation may be required to manage the residual adverse effects for loss of vegetation.
- 4.20 On this basis, DOC recommends the Panel requests the Applicant to provide an offsetting model using the BOAM model to ensure the effects relating to the proposed vegetation clearance are managed accurately, and appropriately.

Lizards:

Values of species:

- 4.21 With relation to the values of lizards on the site, Mr Wedding's statement of evidence sets out multiple concerns relating to lizards and the potential and adverse effects of the project. In his evidence he outlines concerns regarding the spatial extent of terrestrial lizard habitat, the magnitude and level of effect of habitat and potential population loss, and the likelihood that the proposed management measures will produce an equivalent or improved outcome for lizards, particularly copper skink.
- 4.22 Mr Wedding considers that copper skink should be assigned a Very High ecological value when assessed at the regional scale, that the affected lizard habitat is likely to be exceed 3ha, and that the removal of almost all habitat associated with the only known threatened copper skink population within the development site represents a Very High magnitude of effect.
- 4.23 The Ecological Assessment records northern grass skink within the site and assigns this species with a low ecological value. DOC agrees with this classification. However, DOC does not agree this classification justifies assigning low habitat to a connection vegetation fragment that supports a mixed lizard assemblage. Mr Wedding points out that species values, habitat

¹⁵ Appendix 15 – Ecological Impact Assessment, page 45, section 6.1

¹⁶ Statement of Evidence, Ms Hooker, para [46]

¹⁷ Statement of Evidence, Ms Hooker, paras [44-47]

¹⁸ Statement of Evidence, Ms Hooker, para [45].

values and effects on individual populations should be assessed separately so that the higher-value component is not suppressed by the more common species or by the modified origin of the vegetation.

Values of habitat:

- 4.24 In terms of habitat value, DOC has concerns in relation to the assessment undertaken to date. Mr Wedding notes the assessment does not distinguish between vegetation value, species value, and the functional value of vegetation as lizard habitat.
- 4.25 The Lizard Management Plan (the LMP) attached as Appendix 16 of the substantive application specifies low-quality of habitat as habitat where very few lizards are expected and/or no At-Risk species are likely to occur. The LMP defines moderate-quality habitat as including habitat where at-risk species expected to occur at least infrequently¹⁹.
- 4.26 One of DOC's key concerns relates to habitat assignment to areas where copper skink have been confirmed to occur. Mr Wedding notes the low-value classification applied to areas 8-10 is not consistent with the LMP's own valuation criteria where that vegetation forms part of the habitat supporting copper skink²⁰. Furthermore, the assessment of effects²¹ on lizards describes areas 9 and 10 as low value and treats these areas as narrow strips. Whilst Mr Wedding issues these areas should be treated as a contiguous area of planted native vegetation.
- 4.27 This is also similar for areas 8 and 10 in relation to northern grass skink, where the Applicant has only sampled portions of much more extensive vegetation margin. Mr Wedding considers that the adjacent pine forest fragment may also provide suitable copper skink habitat, as the species is known to use forested environments, including plantation forest. While the survey results confirm that copper skinks occupy the wider vegetation complex, they do not define the full extent of the habitat. He also notes that the absence of survey detections in adjoining areas should not be taken as evidence that those areas are unsuitable or unoccupied by copper skinks²².
- 4.28 On this basis, DOC is of the opinion that the habitat for copper skink and northern grass skink has not been fully identified, and reconsideration is necessary before the magnitude and overall level of effect are finalised.

Magnitude of effect

- 4.29 DOC is of the opinion that the assessment of effects on lizards²³ provides an improvement to the Ecological Assessment as it provides a separate EIANZ assessment for all lizards surveyed in Area 1 and the adjacent QEII forest. However, as informed by Mr Wedding, DOC

¹⁹ Appendix 16 – Lizard Management Plan, page 9, section 1.5.

²⁰ Statement of Evidence, Mr Wedding, page 7.

²¹ [2535 Mt-Welcome lizard-effects-assessment 8Jul26.issued Redacted.pdf](#)

²² Statement of Evidence, Mr Wedding, Page 8.

²³ [2535 Mt-Welcome lizard-effects-assessment 8Jul26.issued Redacted.pdf](#)

is concerned because the assessment remains dependent on the underestimated habitat area and does not assess the pre-mitigation effect on the affected copper skink population.

4.30 This is based on the three concerns set out by Mr Wedding which is summarised as follows:

- Capture numbers do not reflect population size: The number of lizards captured during a short survey should not be treated as an estimate of the total population present.
- Habitat availability does not equate to population resilience: the presence of similar vegetation elsewhere in the ecological district does not demonstrate equivalent habitat quality, occupancy by copper skinks, population connectivity, or the availability of suitable replacement habitat within dispersal distance.
- Salvage and relocation are double counted: Salvage and relocation re mitigation measure and should not be used to reduce the assessed magnitude of effects before mitigation is applied.²⁴

4.31 Mr Wedding specifies the pre-mitigation effect is the permanent removal of almost all of the connected vegetation associated with the only known copper skink population within the site. Further, based on the information available, the project may remove a very high proportion of habitat available to copper skink and may result in its complete loss from the site unless relocation succeeds²⁵.

4.32 In terms of overall magnitude of effect, Mr Wedding records the EIANZ guidelines describe a Very High magnitude as total loss or very major alteration of key baseline features, or loss to a very high proportion of the known population of range of the feature, in which he considers to proposed loss from the Project to be consistent.²⁶

4.33 Mr Wedding concludes that the combination of a Very High Ecological Value and a Very High magnitude of effect result in a Very High level effect²⁷. DOC considers that this supports the conclusion that the actual and potential adverse effects of the Project on Lizards are significant.

Actual and Potential Effects

4.34 The assessment of effects on lizards²⁸ provided by the applicant on 27 July 2026, outlines there are two categories of effects on lizards:

- Construction Effects. The disturbance, injury or death of resident lizards, and the loss of occupied habitat during vegetation and earthworks; and
- Operational effects: A chronic increase in predation pressure on forest-dwelling lizards from the increase in domestic cats associated with c.950 new dwellings.

²⁴ Statement of Evidence, Mr Wedding, page 9.

²⁵ Statement of Evidence, Mr Wedding, page 9.

²⁶ Statement of Evidence, Mr Wedding, page 9.

²⁷ Statement of Evidence, Mr Wedding, page 9.

²⁸ [2535 Mt-Welcome lizard-effects-assessment 8Jul26.issued Redacted.pdf](#)

4.35 Mr Wedding considers that salvage and relocation may reduce the number of lizards killed during vegetation clearance and earthworks. However, these measures do not avoid the loss of occupied habitat and should not be assumed to maintain the affected population²⁹.

Operational Effects - Domestic Cat Predation:

4.36 To manage the operational effect the Applicant proposes a consent requirement that all domestic cats within the development be desexed and microchipped, reducing the risk of stray or feral population establishment and enabling identification of straying animals. Mr Wedding considers the desexing and microchipping will reduce the risk of feral population establishment and assist identification but will not prevent owned cats from roaming into lizard habitat and causing mortality³⁰.

4.37 DOC agrees that the increase of domestic cat predation into the site will be an operational effect. Despite this, DOC does not support the assessment of effects³¹ provided as the assessment focuses on cats and dogs and does not address the likely increase in commensal rats associated with residential zones. Mr Wedding is of the opinion that the combined effects of cats and rats is relevant because both are effective predators of indigenous lizards and are likely to be concentrated along the urban-natural urban interface.

4.38 DOC also notes other foreseeable operational effects could potentially arise including fragmentation, road barriers to movement, increased recreational access, disturbance of logs and ground cover. Mr Wedding notes the adjoining Muri Road development forms part of the cumulative context. While it has separate management requirements, it still contributes to increased residential predator sources, habitat fragmentation, and disturbance across the wider landscape³².

4.39 Mr Wedding also notes these effects are particularly important as the current effects management package relies on small retained and created habitats supporting relocated populations. He suggests that the assessment should address the post-development suitability of those sites over the life of the subdivision, rather than only their condition at time of the release.³³

Comments on Lizard Management Plan:

4.40 To manage the potential and actual effects on lizards, the Applicant proposes the implementation of an LMP to minimise harm to lizards³⁴. While DOC supports the use of an LMP, it is concerned that the findings of the lizard surveys provided in the Ecological Memorandum have been adequately incorporated into the project design. The LMP states that the current layout encompasses all areas and values for lizards than can be feasibly

²⁹ Statement of Evidence, Mr Wedding, page 10.

³⁰ Statement of Evidence, Mr Wedding, page 10.

³¹ [2535 Mt-Welcome lizard-effects-assessment 8Jul26.issued Redacted.pdf](#)

³² Statement of Evidence, Mr Wedding, page 10.

³³ Statement of Evidence, Mr Wedding, page 10.

³⁴ Appendix 15 – Ecological Assessment, page 46, para [6.1.1].

avoided³⁵. However, Mr Wedding is of the opinion that the LMP will not sufficiently reduce effects on native lizard populations.

4.41 In his evidence Mr Wedding has undertaken an assessment of the LMP against DOC's nine principles for lizard salvage and transfer. Overall, his opinion is that the Project does not demonstrate that those principles have been satisfied. In summary his assessment on each of the nine principles is as follows:

- Receiver site values and habitat extent have not been adequately quantified for copper skink;
- The effects assessment understates the potential effect on copper skink;
- Avoidance has not been reconsidered following the survey results;
- The regional threat status of copper skink has not been given commensurate consideration;
- Receiving-site suitability and carrying capacity have not been demonstrated;
- Monitoring remains conditional on capture thresholds despite a potential population scale loss for threatened copper skinks; and
- Contingency measures do not adequately address potentially higher capture numbers, receiving-site failure or the potential loss of affected copper skink population³⁶.

4.42 Other concerns DOC has with the LMP is set out below:

- The LMP proposes five relatively small, patchily distributed terrestrial release sites, with some sites (R3–R5) appearing isolated from each other and from R1–R2. This would replace a larger connected occupied habitat area (including the 2.7 ha indigenous vegetation and pine fragment) with several smaller receiving sites, without assessing implications for dispersal, recolonisation, population connectivity, or long-term population resilience.
- The LMP identifies Karehana Bay Scenic Reserve as the receiving site for copper skink, whereas the July 2026 memorandum indicates the enhanced 6,700 m² on-site grassland will be used for both northern grass skink and copper skink. These conflicting approaches need to be reconciled and supported through an updated LMP and residual effects assessment. DOC recommends the Panel directs the applicant to amend the LMP.
- Copper skink has not been recorded at the proposed on-site release sites. While this does not prove the sites are unsuitable, their habitat suitability and carrying capacity have not been demonstrated. If suitable habitat features are absent, relocation may

³⁵ Appendix 16 – Lizard Management Plan, page 12, section [1.6].

³⁶ Statement of Evidence, Mr Wedding, page 11.

be inappropriate; if skinks were simply not detected, the presence of existing populations and available capacity remain unknown.

- The LMP does not clearly explain how release-site preparation will align with staged construction. Some proposed receiving sites are currently grazed pasture and are unlikely to provide equivalent habitat immediately following stock exclusion. DOC recommends the Applicant provide further information for the Panel's consideration.
- Habitat enhancement measures should be completed before salvage and release occur, including planting, refugia installation and stabilisation, ground-cover establishment, stock exclusion, predator control, and protection from construction effects. A project herpetologist should verify that predefined habitat-condition standards have been met before any lizards are released. It is recommended this approach is incorporated into the LMP and subsequently implemented within lizard related consent conditions
- Proposed desexing and microchipping requirements assist with identifying cats but do not prevent owned cats from accessing habitat and release sites. The programme relies on reactive measures, is limited geographically, and is proposed for only ten years despite permanent residential development. Longer-term measures such as fencing, cat curfews, ownership restrictions, and educational initiatives should be considered. DOC recommends these are included in the LMP and subsequently imposed as resource consent conditions.
- Rodent control is proposed only for a limited period and does not include long-term predator performance standards to address likely increases in urban-associated rats. The ongoing suitability of release sites is therefore uncertain. DOC recommends consideration should be given to a Residents' Association within the consent conditions to provide long-term management of restoration planting, pest control, domestic cat management, and compliance activities.³⁷

4.43 DOC considers that lizard management is best addressed through a dedicated Lizard Management Plan within the district consent conditions package, rather than through standalone consent conditions. While lizard-related requirements are currently contained in consent conditions 40–48, DOC considers that, in addition to consent conditions, an LMP would provide clearer standards, performance targets, and limits for managing effects on lizards, while also ensuring consistency with wildlife authority requirements. DOC notes that the updated consent conditions do not require a certified LMP, do not include clear performance targets, targeted predator control at release sites, or all of the effects management measures proposed in the LMP.

³⁷ Statement of Evidence, Mr Wedding, Page 13-14.

Residual Effects on Lizards:

- 4.44 DOC is of the view that the Project is likely to result in more than minor residual adverse effects for copper skinks, when considering the extent and permeance of potential habitat loss. Mr Wedding concludes the LMP is likely to reduce direct injury and mortality to individual lizards only and it does not demonstrate that the affected copper skink population will persist, that the receiving sites can support these populations, or that the habitat compensation is commensurate with the loss.
- 4.45 Based on the evidence of Mr Wedding, DOC is of the opinion that there will be a net loss for copper skinks, even if the species was to be relocated onsite into dedicated, managed habitat with northern grass kinks.
- 4.46 It is noted that within the LMP the Applicant proposes compensation, without first having considered offsetting the residual adverse effects. The effects management hierarchy directs that where residual adverse effects remain after avoidance and minimisation measures have been applied, the effects management hierarchy requires consideration biodiversity offsetting before compensation. Hence, the Department is of the view the Applicant should demonstrate whether the residual adverse effects on lizards can be offset in accordance with the NPS-IB. If biodiversity offsetting is not possible, compensation should then be considered.

Overall comment:

- 4.47 DOC is of the opinion that with the proposed lizard management, the Project will result in a residual significant adverse effect on lizards. Outside of SNAs, the NPS-IB requires the implementation of the effects management hierarchy, including offsetting and compensation where adverse effects cannot be avoided, remedied, or minimised. DOC is not aware of the application providing an effects management package in the project description, or resource consent conditions. DOC recommends that the Panel request further information on this matter from the Applicant. On this basis, DOC has not provided any specific consent condition amendments relating to lizard management.

Long-Tailed Bats:

- 4.48 The Ecological Assessment did not provide a desktop assessment for Long-Tailed Bats (Threatened – Nationally Critical) (LTB) within or near the site. Instead, it relied on the ecological assessment prepared at time the structure plan was established, which concluded that bat studies were not necessary given the long absence bat records in the area³⁸. In its review, Wildlands noted that the DOC bat database shows records of bats within 25km of the site and recommended the Applicant undertake acoustic bat monitoring within the site to determine whether LTB present are present. Wildlands also recommended the use of pre-felling measures prior the commencement of works during earthworks and construction³⁹.

³⁸ Appendix 15 – Ecological Assessment, page 2, section 1.3.

³⁹ Wildlands Ecological Review, page, 4, section 4.2.2.

4.49 In response, the Applicant does not agree with Wildlands' recommendation and confirms acoustic bat monitoring has not been undertaken as they consider there is no suitable bat habitat within the site⁴⁰.

4.50 DOC agrees with the recommendations provided by Wildlands and recommends that the Applicant adopts a precautionary approach⁴¹ by undertaking acoustic bat monitoring to confirm whether bats are present within the site.

4.51 DOC also considers this approach to be prudent, given the threat status of LTB (Threatened – Nationally Critical), and the fact that the next category in the threat classification system for LTB is extinction.

4.52 If the Panel directs this and LTB are detected within the site, the Department recommends the following:

- The applicant uses the site-specific survey to inform an effects management response in accordance with the NPS-IB;
- The applicant provides a Bat Management Plan, which addresses the following matters (but is not limited to);
 - Identification of all or confirmed bat roost or roosting features;
 - Tree removal methodology and timing for all confirmed or potential bat roost trees which are proposed to be removed, with regard to DOC's "Protocols for minimising the risk of felling occupied bat roosts", produced by the NZ DOC Bat Recovery Group 2024, or any other update to that document;
 - Details of proposed effects management including any offsetting or compensation to ensure that the development achieves a no net loss outcome for long-tailed bat habitat values;
 - Procedures for certification, review, and amendment of the BMP, including an opportunity for DOC to comment; and
 - The requirement for the BMP to be prepared by a suitably qualified and experienced person.

4.53 Regardless of the recommendation for acoustic bat monitoring, DOC recommends that imposition of consent conditions in accordance with the DOC bat recovery group's protocols for minimising the risk of felling occupied bat roosts⁴².

Freshwater Ecology:

4.54 In this section, DOC's comments relate to the freshwater aspects of the Project. The following comments are informed from the statements of evidence from Dr Katie Collins, and Ms Tayla Hooker, respectively.

⁴⁰ Mt Welcome PCC Terrestrial ecology review response, page 3.

⁴¹ National Policy Statement for Indigenous Biodiversity 2023 (as amended December 2025), Policy 3

⁴² [Protocols for minimising the risk of felling occupied bat roosts](#)

Freshwater values:

- 4.55 The Ecological Assessment sets out the values of the streams and wetlands present at the site. Dr Collins confirms the streams and wetlands impacted by the Project are showing typical signs of impairment as a result from rural land management practices. Dr Collins also notes the stream and wetlands have potential values that could be realised by improved land management. These potential values have not been considered in the Ecological Assessment, which in return reduced the magnitude of the values that may be lost.
- 4.56 With relation to the wetlands, the Ecological Assessment confirms that 0.631ha of wetlands within the site was excluded from consideration by the pastoral exclusion rule set out under the definition of a Natural Inland Wetland set out in the NPS-FM.
- 4.57 Dr Collins notes this approach is not consistent with the Ministry for Environment Guidance, which states the purpose of the NPS-FM pasture exclusion clause is to support the continuing use pasture for grazing purposes. The exclusion is not targeted at pasture being converted for urban development for other land uses. Therefore, this 0.631 ha of pasture-dominated wetland must also be included in the loss of wetland extent as a result of the Project.⁴³ DOC considers it prudent this is included within the assessment of effects⁴⁴, and effects management package.
- 4.58 Further to the above, Ms Hooker notes inconsistencies with the implementation of the pasture exclusion tests, as the applicant has conducted 12 wetland assessments, five of which meet the pasture exclusion test. However, for some of the wetlands which have been ruled out to meet the exclusion test but meet the definition of a natural inland wetland have been delineated as 'wetland excluded by pastoral exclusion rule'⁴⁵.
- 4.59 In relation to wetlands more generally, the Ecological Assessment has identified 16 areas as natural inland wetlands. Ms Hooker contends there are 35 additional wetlands which meet the wetland delineation criteria. It is noted these wetlands have been mapped as 'ambiguous natural inland wetland'. However, in Ms Hooker's opinion these still meet the wetland criteria and should be assessed and natural inland wetland.
- 4.60 Ms Hooker also considers that a number of the wetland features may be more appropriately classified as seepages or flushes, but notes that hydric soil assessment results have not been provided to substantiate this. She also identifies a lack of mapping of seepage wetlands, despite their status as a nationally endangered naturally uncommon ecosystem and questions the conclusion that historical forest cover would have precluded the presence of wetlands on the site. Overall, Ms Hooker considers that wetland typologies across the site have not been sufficiently defined or mapped to enable a robust assessment⁴⁶. DOC recommends the Applicant undertakes hydric soil assessment to identify the nature of these wetlands.

⁴³ Statement of Evidence, Dr Collins, para [15].

⁴⁴ [2535 Mt-Welcome lizard-effects-assessment 8Jul26.issued Redacted.pdf](#)

⁴⁵ Statement of Evidence, Ms Hooker, para [6].

⁴⁶ Statement of Evidence, Ms Hooker, paras [14-19].

4.61 Based on this uncertainty set out in the Ecological Assessment, DOC recommends the Panel request further information from the Applicant for the following information:

- Clarify which wetlands qualify for the pastoral exclusion criteria, and map any wetlands that do not qualify but meet the definition of a natural inland wetland alongside all other natural inland wetlands;
- Undertake hydric soil assessments to confirm wetland status; and
- Provide an updated effects management package in accordance with clause 3.22 of the NPS-FM, reflecting the updated wetland information and assessment findings.

4.62 As is currently stands, the proposed effects management package does not provide for any offsetting for the loss of the areas mentioned above. DOC considers this prudent given the potential ecological values present, particularly if some wetlands are confirmed as being seepage or flush (naturally uncommon).

4.63 In terms of the fish surveys undertaken to date by the applicant, DOC is of the view the surveys are not sufficient to rule out fish being present within the water ways. Dr Collins issues that two single eDNA samples and one night spotlighting surveys at low flows is insufficient to describe fish populations over a large site. In her evidence, Dr Collins relies on a case study which recommends the use of six sample replicates of 1L volume should be used per site to give optimal detection rates for fish and macroinvertebrates. It is acknowledged that some water bodies at the site are not suitable for electric fishing or netting. However, based on the evidence of Dr Collins, DOC recommends that further fish sampling should be undertaken under normal base flow conditions, along with a replicated wider spatial scale eDNA survey.

Use of EIANZ Guidelines:

4.64 In section 5.2 of the Ecological Assessment, the applicant uses the EIANZ guidelines for assessing the level of ecological effects.

4.65 Dr Collins raises concerns regarding the applicant's application of the EIANZ Ecological Impact Assessment Guidelines when assessing the magnitude of wetland loss. In particular, she considers that assessing effects at the catchment scale, rather than the site-specific area potentially affected by the proposal, may understate the magnitude of ecological effects. Dr Collins notes that advice obtained from Dr Ian Boothroyd, Vice President of EIANZ, indicates that the Guidelines require the magnitude of effects to be assessed at the scale of the ecological values being affected (i.e. the zone of influence), with broader catchment-level assessments serving only as contextual information. Accordingly, Dr Collins considers that the applicant's assessment may not appropriately reflect the scale of ecological effects associated with the proposal⁴⁷.

⁴⁷ Statement of Evidence, Dr Collins, paras [34-36].

Provision for Fish Passage:

- 4.66 The Ecological Assessment notes the presence of barriers located downstream of the site (outside of the project footprint). The applicant considers the presence of these barriers is a reason for not providing fish passage at some of the structures on the site.
- 4.67 DOC is concerned with this, as Dr Collins states a lack of fish passage downstream is not an appropriate circumstance for not providing fish passage at any structures put in place as part of the Project. Further, if the downstream barriers were to be remedied, that could open the waterways and habitat upstream, however, if the applicants proposed fish passage barriers are enacted this would further restrict available habitat for species present. Hence, DOC recommends the applicant should consider remediating the downstream fish passage barriers as part of their remediation package to offset residual effects from the Project.
- 4.68 The planning framework under schedule 5 of the FTAA requires the provision for fish passage in accordance with Regulation 70 of the NES-F which states:

“The culverts must provide for the same passage of fish upstream and downstream as would exist without the culvert, except as required to carry out works to place, alter, extent, or reconstruct the culvert...”

- 4.69 Therefore, DOC recommends the Applicant reconsiders the culvert design to ensure fish passage is provided across the entire Project. It is also recommended that fish passage is provided in accordance with the New Zealand Fish Passage Guidelines⁴⁸.

Offsetting and compensation for loss of wetland extent:

- 4.70 The Ecological Assessment confirms the Project will result in the loss of 27,220m² or 2.7220 ha of wetlands (including wetland loss due to the development of retention wetlands, and due to earthworks). The applicant has assigned the overall value of wetland as low – negligible, and the magnitude of effect of wetland loss as low and considers offsetting a under the effects management hierarchy of the NPS-FM is not necessary. Despite this, the Applicant has still proposed offsetting, and proposes 15,311m² or 1.5311ha, which the Applicant considers to be a 1:1 ratio.
- 4.71 Importantly, Appendix 6 of the NPS-FM sets out the principles for aquatic offsetting. Principle 3 requires a no net loss and preferably a net gain which is achieved:
- “by a like-for-like quantitative loss/gain calculation and is achieved when the extent or values gained at the offset site (measured by type, amount and condition) are equivalent to or exceed those being lost at the impact site”.*

- 4.72 DOC does not support the proposed offset, noting the offset does not provide for a 1:1 ratio. Dr Collins notes the proposal extensively proposes non-like-for-like habitats in offsetting,

⁴⁸ [NZ Fish Passage Guidelines v4.5 July2025.pdf](#)

changing from riverine and natural inland wetland habitats to retention wetlands habitats, which deal with stormwater retention and flood flows, rather than for biodiversity values⁴⁹.

4.73 DOC also notes the applicant has not provided any consent conditions which set out how the proposed offset will be implemented, including performance targets to achieve a no net loss or preferably a net gain. It is recommended the Applicant includes conditions setting out wetland offsetting performance targets, with a subsequent Wetland Management Plan condition with the purpose to:

- describe the methods that will be employed to ensure compliance with offsetting performance targets; and
- describe the methods to identify and monitor the presence/absence of indigenous aquatic species identified in the ecological assessment.

4.74 DOC also recommends the inclusion of an offset monitoring review as a condition of consent, which would occurring across multiple years following the completion of the wetland offset. This monitoring review should identify whether further actions are required to achieve the performance targets. If the performance targets are not met, further amendments to the wetland management plan would be required.

4.75 The Ecological assessment proposes the creation of a 5m wide woody indigenous riparian margin to 50% of the wetland gullies and stormwater lakes⁵⁰. DOC supports the creation of wetland buffers. However, opposes a width of 5m. Ms Hooker notes a buffer of at least 10 metres is generally necessary to enable indigenous vegetation succession that should requires minimal maintenance and to enhancement of aquatic functions⁵¹. With regard to the planning framework, a 10m wide buffer is considered to align more closely with the thresholds set out in the NES-FW which uses a 10m setback in numerous of regulations to activities within or near natural inland wetlands and their margins.

Wetland remediation and rehabilitation:

4.76 The Ecological Assessment identifies the offset for wetlands would require wetland rehabilitation within the wetland gullies which includes:

- Pre-planting wetland area preparation – retain grazing until ready to plant and then provide ecological weed suppression just prior to revegetation.
- Wetland plant introduction - eco sourced 1 L plants appropriately hardened and professionally planted (no fertiliser).
- Use contour and hydrology guides to establish the outer wetland planting guidelines (informed by the project ecologist).

⁴⁹ Statement of Evidence, Dr Collins, para [32].

⁵⁰ Appendix 15 – Ecological Assessment, page 77.

⁵¹ Statement of Evidence, Ms Hooker, para [57].

- Fencing from stock post-planting and incorporating the riparian areas (at least 5m buffer from wetland edge, or 10m for stream offset planting).
- Weed and pest management for up to 3 years or until the wetland vegetation cover is 80% of any 5m by 5m vegetation monitoring quadrat.
- Planting of a 5m wide buffer of woody indigenous plants at 1m spacing using 1L plant sizes along the northern edge (inside of the fence).⁵²

4.77 In relation to monitoring the success of the proposed effects management (including the remedial wetland areas), the Ecological Assessment recommends that once the offsetting program has been enacted the project ecologist should biannually monitor the progress of the offset wetland development so as to confirm the correct species planning and establishment. More specifically, across a 3-year process and /or to 80% wetland vegetation over to ground⁵³.

4.78 DOC notes the Applicant has not proposed the above measures within a specific wetland management plan or within the resource consent conditions. It is noted the proposed effects management package for indigenous vegetation removal associated with the proposed roundabout has been set out within its own management plan⁵⁴. For consistency in approach DOC recommends that these requirements are imposed within a Wetland Management Plan and included within the resource consent conditions⁵⁵.

5 Conclusion

5.1 Overall, DOC is concerned that the ecological effects of the Project, particularly on indigenous biodiversity, lizards, wetlands, and streams, have not been adequately assessed. DOC is also concerned that aspects of the proposed effects management package and draft consent conditions require further development. DOC therefore recommends that the Panel seek further information from the Applicant to address the matters identified above before determining the application.

5.2 Thank you for the opportunity to comment.

6 Appendices

Appendix A: Expert statement – Lizards – Chris Wedding

Appendix B: Expert statement – Flora and Ecosystems – Tayla Hooker

Appendix C: Expert Statement – Freshwater Ecology – Dr Kathryn Collins

⁵² Appendix 15 – Ecological Assessment, page 64, section 8.1.

⁵³ Appendix 15 – Ecological Assessment, page 67, section 11.2.

⁵⁴ Appendix 15 – Ecological Assessment, page 85.

⁵⁵ *Ibid* at [4.70-4.71].