

BEFORE THE MT WELCOME EXPERT CONSENTING PANEL

IN THE MATTER of an application for approvals under section 42 of the Fast Track Approvals Act 2024 (the Act)

AND

IN THE MATTER of the Application for approvals by Pukerua Property Group Partnership for Mt Welcome, Pukerua Bay, Porirua Project including resource consents, a wildlife permit, an archaeological authority and a complex freshwater fisheries approval to develop residential allotments, an allotment and preparatory works to enable a future commercial centre and associated infrastructure in Pukerua Bay, Porirua. Application FTAA-2603-1181

**JOINT STATEMENT OF EXPERTS IN THE FIELD OF TERRESTRIAL
ECOLOGY**

Dated 18 August 2026

INTRODUCTION

1. Expert conferencing of the topic of terrestrial ecology took place by videoconference on 18 August 2026.
2. The conference was attended by:
 - a. Vaughan Keesing (VK) on behalf of the applicant;
 - b. Tayla Hooker (TH) on behalf of the Director General of Conservation; and
 - c. Nyree Fea (NF) on behalf of Porirua City Council.
3. Gary Bramley acted as facilitator and assisted the experts to draft the Joint Witness Statement

CODE OF CONDUCT

4. The experts confirm that they have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. The experts confirm that the issues addressed in this Joint Witness Statement are within their area of expertise, unless stated otherwise.

SCOPE OF STATEMENT

5. In our conference we discussed the issues relevant to the Application which arise within our field of expertise. Prior to attending the conference, we each read the relevant parts of the Application, the evidence and independent reports prepared by the other expert(s) and circulated.
6. The issues are:
 - a. Location and effects of the roundabout;
 - b. Extent of vegetation clearance required;
 - c. Offsetting vegetation loss;
 - d. Application of the effects management hierarchy;
 - e. Need for a bat survey;
 - f. Need for management plans to be provided with the application;
 - g. Monitoring vegetation at restoration/offsetting sites

- h. Pest control
- 7. In relation to each issue, we discussed points of agreement and disagreement in relation to:
 - a. FACTS;
 - b. ASSUMPTIONS;
 - c. Areas of uncertainty or lack of information; and
 - d. EXPERT OPINIONS / conclusions.
- 8. In this Joint Statement we report the outcome of our discussions in relation to each issue by reference to points of agreement and disagreement relating to facts, assumptions, uncertainties and expert opinions / conclusions. We have noted where each of us is relying on the opinion or advice of other experts. Where we are not agreed in relation to any issue, we have set out the nature and basis of that disagreement.
- 9. We have not considered the draft consent conditions proposed by the Applicant.

ISSUE 1 – Location of the Roundabout

FACTS

- 10. The following facts are agreed:
 - a. NF has been to the site but did not inspect the SNAs. TH has not been to the site and is relying on the descriptions provided in the terrestrial ecology report and her review of publicly available information (e.g., Google Earth).
 - b. The location, form and size of the roundabout has been determined by Waka Kotahi/NZTA based on traffic requirements.
 - c. Construction of the roundabout as proposed would remove 2,036m² of vegetation within areas identified as Significant Natural Areas in the Porirua District Plan on both sides of SH59 (1,345m² to the west, 691m² to the east).
 - d. There is a trade-off between stream loss and SNA loss when constructing the roundabout with respect to realignment of the stream

rather than piping it (realignment would require more clearance of SNA vegetation).

EXPERT OPINIONS

11. The following expert opinions were expressed in relation to this matter:

- a. VK has considered the 1,345m² (rounded to 1,400m²) to the west of SH59 to be SNA. He excluded the 691m² to the east because he does not consider that it meets the criteria set out in the Porirua District Plan for determining ecological significance. The 691m² is therefore not included in his offset determinations. This matter is discussed further below.
- b. NF and TH consider that based on aerial photographs the vegetation to the east of SH59 looks to have been in existence prior to 1995 (i.e., older than c. 30 years). There is a native component, which most likely explains why it was included in the SNA. In their view it should be included in the SNA and any loss should be accounted for via offsetting.
- c. VK agrees the vegetation appears native in aerial photographs because of the native elements in the canopy.
- d. VK considers that the vegetation within the part of the SNA to the east of SH59 is low quality with the ground cover dominated by wandering willy (*Tradescantia fluminensis*), although he agrees the canopy includes a native component, predominantly māhoe. He notes that the description of the SNA describes a kohekohe canopy, which in his view supports his conclusion that the vegetation does not meet the significance criteria (it is not representative vegetation).

UNCERTAINTIES

12. Construction of the roundabout does not happen immediately, rather it depends on staging, which remains unknown. On that basis the need for the roundabout (versus, for example, traffic lights) may change in future. VK noted that the need for a roundabout is partly based on the applicable speed limit, which he understood was to be reduced when Transmission Gully was completed, but this reduction in the speed limit has not occurred.

Such a limit reduction would enable provision of traffic lights, which would have a smaller footprint than the current proposal. Whether or not the roundabout proceeds remains uncertain given that the traffic situation may change in future.

IMPORTANCE

13. The following is agreed in relation to the importance of this issue:

- a. The construction of the roundabout is the only activity that would affect vegetation identified as SNA in the Porirua District Plan.
- b. Reducing the amount of indigenous vegetation cleared would reduce the level of effects on terrestrial ecological values due to the proposal.

ISSUE 2 – Extent of vegetation clearance.

FACTS

14. The following facts are agreed in relation to this issue:

- a. To clarify the names and locations of the sites referred to here VK provided the following map:



- b. Predominantly indigenous vegetation clearance comprises 7,436m² including:
 - i. 2,036m² SNA (in two separate patches 1,345m² west and 691m² east)
 - ii. 5,000m² Shrubland 1
 - iii. 400m² Roadside scrub.
- c. Shrubland 1 was planted in 2002 and includes karo, karaka, pōhutukawa, mānuka and kānuka. Some elements are not native to the Wellington Region.
- d. SNA 27 was also planted and is recognised as significant vegetation.

EXPERT OPINIONS

15. EXPERT OPINIONS in relation to this matter were as follows:

- a. NF and TH consider that there are other areas east of SH59 that include indigenous vegetation on acutely threatened level IV land environments, specifically the roadside scrub and Shrubland 1 (see the figure above).
- b. In relation to Shrubland 1, NF characterised this as indigenous scrub (i.e., has >80% canopy cover) and considers that it provides habitat for common native birds and is predominantly indigenous including local elements (based on her site visit notes).
- c. TH and NF agree that all indigenous vegetation occurring on acutely threatened level IV land environments should be considered via the effects management hierarchy. VK does not agree with that broad statement.
- d. VK does not consider Shrubland 1 to be an indigenous community. His view is that Shrubland 1 has some ecological value, but it is relatively young, small in extent, the provenance of the plants is unknown and several do not occur naturally in the local area. For these reasons he considers it to be low value.
- e. TH noted that it is likely parts of SNA 27 were originally planted (decades ago). Given that this planted area is recognised as

significant vegetation, NF and TH consider it reasonable to also account for the loss of the planted indigenous vegetation comprising Shrubland 1 as part of the proposal.

- f. In relation to the roadside scrub east of SH59, NF and TH consider that also includes indigenous vegetation on acutely threatened level IV land environments.
- g. VK considers that the roadside scrub vegetation includes weeds and common native species and is not predominantly indigenous.
- h. TH considers that even with weedy components, the roadside scrub connects to SNA 29, buffers the road, includes indigenous species and is located within an acutely threatened land environment. It is lower value than other remnants, but it still represents a loss of indigenous biodiversity so should be included in any proposed offset (accounting for its low value).
- i. VK does not agree.

ASSUMPTIONS

- 16. There were no material assumptions in relation to this matter.

IMPORTANCE

- 17. The extent of indigenous vegetation clearance and how effects of that vegetation clearance are managed is material in determining the overall level of effects of the project. At present TH and NF consider that the effects of that clearance have been underestimated because not all predominantly indigenous vegetation has been included and proposed to be offset. VK disagrees.

ISSUE 3 – Relative value of the SNA vegetation

FACTS

- 18. The following facts are agreed in relation to this matter:
 - a. The area at question is the 691m² east of SH59.
 - b. The site is located in an acutely threatened level IV land environment with very little indigenous vegetation cover remaining.

ASSUMPTIONS

19. No assumptions were identified in relation to this matter.

EXPERT OPINIONS

20. The following expert opinions were expressed in relation to this matter:

- a. NF and TH consider that the area has an indigenous component and therefore has ecological value and is unquestionably within the SNA and should therefore be included in the offset calculation.
- b. VK doesn't consider it has sufficient condition to be included in the SNA and therefore be offset. In particular the ground cover of predominantly wandering willy and the canopy of predominantly māhoe with weed vines does not elevate its value.
- c. NF and TH consider that in a threatened level IV land environment with very little indigenous vegetation cover remaining, Shrubland 1 and the roadside scrub would trigger the rarity criterion and they also have some connectivity value, so would trigger the significance criteria in the Porirua District Plan.
- d. NF noted that in her view there is a lack of information with respect to the species composition and dominance of these areas provided in the EclA and so a full assessment of the value of the roadside scrub and Shrubland 1 is not possible at present based on the information provided.
- e. VK disagrees with the above statements.

ISSUE 4 – Offsetting the vegetation loss

FACTS

21. No facts are agreed in relation to this matter:

22. The following facts are not agreed in relation to this matter:

- a. The extent of indigenous vegetation that requires offsetting to address effects of the proposal.

ASSUMPTIONS

23. No assumptions were identified in relation to this matter.

EXPERT OPINIONS

24. The following expert opinions were expressed in relation to this matter:

- a. VK's position is that 1,400m² of SNA vegetation should be offset (1,345m² rounded up). He has proposed a ratio of 3:1 resulting in 4,200m² of planting being required to offset the loss of vegetation as a result of the proposal.
- b. TH and NF consider that even accepting that the value is 1,400m² (which they do not) this is a low quantum for replacing mature forest which has significant values.
- c. They request that a BOAM (Biodiversity Offset Accounting Model) be supplied which is based on vegetation quality and area (not area alone) and includes all of the vegetation included in the 7,436m² set out above. If no BOAM is provided then they would prefer a more precautionary approach of 7:1 – 10:1 replacement:loss.
- d. TH does not support application of ratios and would prefer to see a BOAM. Her understanding is that the ratio was based on Transmission Gully, which was completed in 2011, so it represents an "old" approach when the Department of Conservation BOAM had not yet been developed.
- e. NF noted that the draft BOAM provided most recently by VK (August 2026) did not use the right metrics and was not calculated using best practice.
- f. VK confirmed he did not use a BOAM, but rather used a simplified version to check the validity of the ratio proposed.
- g. If a BOAM was adopted, all agreed that the attributes used could include:
 - i. Basal area (could limit to the most common species);
 - ii. Canopy cover;
 - iii. Canopy height;
 - iv. Different tiers of vegetation present;
 - v. Species richness;
 - vi. Ground cover;

- vii. Epiphytes/lianes.
- viii. A suitable benchmark would be high-quality coastal forest of the appropriate type (e.g., kohekohe forest on Kāpiti Island). There might be three different types of forest to offset (40 – 60-year old SNA forest, 30-year old shrubland and 10-year old roadside scrub). Each could be captured in a different BOAM. Monitoring of this approach would provide sufficient information to inform determination of vegetation recovery/success of the offset and therefore confirm no net loss (and preferably a net gain) of biodiversity with respect to indigenous vegetation.
- h. VK does not consider that a BOAM is required based on the low ecological value of the vegetation, particularly the vegetation he has excluded from the proposed offset.

IMPORTANCE

25. The following is agreed in relation to the importance of this issue:

- a. The effects management hierarchy includes avoid, minimise, remedy and offset/compensation. On the basis that the vegetation clearance cannot be avoided or remedied and cannot be further minimised, offsetting or compensation are the only avenues available to manage effects of the proposal. What is at dispute is whether the level of residual effects justifies offsetting and the quantum of offset proffered.

ISSUE 4 – Application of the effects management hierarchy

FACTS

26. There were no facts identified that have not been identified elsewhere in this document.

ASSUMPTIONS

27. No assumptions were identified in relation to this issue

UNCERTAINTIES

28. The project staging is not fully understood yet, so it is difficult to forecast effects of vegetation removal, particularly that associated with the roundabout, but also more generally. The only certain thing is removal of 0.5ha of Shrubland 1 at some point in the future.

EXPERT OPINIONS

29. The following expert opinions were expressed:

- a. NF is of the opinion that there is not enough detail in the application to determine with absolute clarity how the effects management hierarchy has been applied and what the effects actually are. It remains unclear to her if avoidance has been fully explored and whether it would be considered in future if something material about the project changed over the relatively long and uncertain project life.
- b. TH noted that more detail about how the scheme design had been imposed on the site would help understand this approach and how the decisions about effects management were made.
 - i. VK considers that avoidance was fully explored to the extent it could be, given what is currently known. The project avoids most of the wetlands and streams. He sought to avoid vegetation clearance, but that wasn't achievable and he's not clear why.
- c. VK noted that the only space allocated to "offsetting" is adjoining SNA 29 and at some larger gully sides. There are additional areas available in the gullies and riparian areas for restoration planting, but this hasn't been included in his calculations to date and is not allocated for the purposes of "offsetting".
- d. VK noted compensation is not proposed because the level of effect is not such that compensation is required.
- e. NF and TH are of the opinion that it depends what the extent of vegetation clearance is and how reliably the offset can be calculated and demonstrated as to whether compensation would be required or not and both these matters remain to be confirmed.

IMPORTANCE

30. The extent of offset planting required to achieve no net loss of biodiversity depends on the amount of vegetation removal and the methods used to generate and calculate the offset. At present the extent of removal and the method used to derive the offset quantum are both disputed.

ISSUE 5 – Need for a bat survey

FACTS

31. The following facts are agreed in relation to this matter:
- i. Dr Hazel Burridge, a bat expert from Boffa Miskell, did desktop research to inform the plan change for this site. She did not do acoustic surveys, but concluded it was unlikely that bats were present.
 - b. The Department of Conservation trigger for considering bats potentially present is bat records within 25km of the site within the last 10 years. That trigger is met at this site. Results in the DOC bat database are also patchy, with no surveys previously undertaken for this site.
32. There are no facts in dispute.

ASSUMPTIONS

33. The following assumptions are agreed in relation to this matter:
- a. VK considers that the only potential bat habitat is exotic trees which could be felled as of right with no specific bat management.

UNCERTAINTIES

34. NF and VK agreed that the staging of the development is a relevant consideration in respect to this matter because there may be sufficient time to do acoustic surveys after approvals are granted and before a particular

area is cleared. This uncertainty could be addressed via a condition of consent that includes a requirement for a bat management plan that involves acoustic surveys, assessing roost site characteristics and sets out the pathway if you detect bats (apply the roost tree felling protocols) or not (fell the trees without applying the protocols).

EXPERT OPINIONS

35. The following expert opinions were expressed in relation to this matter:

- a. TH abstained from this conversation because it is outside her area of expertise.
- b. VK's preferred approach is to implement the Department of Conservation Bat Roost Tree Felling Protocols rather than completing an acoustic survey in advance of approvals being granted on the basis that this is the likely outcome if bats are detected anyway.
- c. NF considers that moving straight to applying the protocols becomes high risk for the applicant because there are so many exotic trees and a large proportion of them could exhibit roost features. In her view an acoustic survey across the site would reduce the risk and make implementing the protocols more practically achievable (i.e., only where required, not site wide). In her view not undertaking a survey increases the risks to bats, if present.
- d. VK's view is that evidence of absence is not enough to determine that the tree felling protocols to protect bats will not be required at the site – even if you completed an acoustic survey and found no bats, it would make no practical difference to the need to apply the bat roost tree felling protocols. Either way the applicant would need to apply them.
- e. NF stated that that is not her experience, when you follow the Department guidelines, which is to undertake acoustic surveys across a couple of seasons (to capture seasonal differences in bat behaviour), if you do not detect bats, then it is accepted that you don't need to apply

the tree-felling protocols. In her view that approach significantly reduces the risk of bats being present and undetected. In the design phase of the acoustic survey which would locate potential roosting sites (as well as favourable flight corridors and foraging areas), and if the survey results in no detections then no further bat management is needed. Without an acoustic survey, just applying the tree-felling protocols would increase the cost and the survey time for the applicant and increase the potential for risk to bats.

- f. NF is of the opinion that it would be best to include the draft bat management plan as part of the application in the same way as the draft Lizard Management Plan and Ecological Management Plan. This matter is considered further below.

UNCERTAINTIES

36. The following uncertainties were identified and agreed in relation to this issue.

- a. It remains unknown whether long-tailed bats are present in the wider area or not and if present, whether they use the site for feeding, commuting, roosting or other purposes.

IMPORTANCE

37. Bats are absolutely protected wildlife under the Wildlife Act 1953 and are considered “Threatened”. If bats were present, the effects could be disproportionately high (e.g., removal of an important roost tree with bats roosting in it, removing valuable breeding habitat and killing any resident bats) if not managed appropriately.

ISSUE 6 – Need for Management Plans to be provided with the Application

FACTS

38. The following facts were agreed in relation to this matter:

- a. No draft management plans were provided with the Application except for the lizard management plan.

ASSUMPTIONS

39. No assumptions were identified in relation to this matter:

EXPERT OPINIONS

40. The following expert opinions were expressed in relation to this matter:

- a. NF and TH consider that draft management plans should be included in the application to provide the decision maker with certainty and confidence as to the outcome of the management proposed, particularly in relation to offsetting. It is important that all planned management actions, offset calculations and monitoring triggers are detailed in a plan so that the appropriate procedures are followed and so intended results are realised.
- b. VK does not consider that draft plans need to be included in the application. In his view the approval needs to include appropriate conditions which require the plans to be prepared and prescribe the required outcome(s) of the management plan(s) to be prepared. His reasoning being that the panel are not able to certify the management plans, so it makes sense for any plans to be prepared after approval is granted and then certified as fit for purpose by the relevant Council. Certainty is provided through the certification process.
- c. NF commented that draft management plans which clearly set out the actions needed provide more certainty. The plans do not need to be certified to assist in that regard.
- d. NF and TH (noting she is not an expert in avifauna) consider that a management plan for nesting birds is required, including coverage of rank grass areas which need to be included in checks for nesting birds (e.g., pīhoihoi/NZ pipit).

- e. VK does not think rank pasture needs to be mapped because there isn't rank grass habitat present given that the site is farmed, and where rank grass does occur, it is limited in extent and restricted to places such as gardens, where it could be cleared as of right with no protection for birds. In his view it is the indigenous shrubland and SNA vegetation that provides habitat for birds.
- f. VK is also concerned that what is considered best practice management changes over time and with a project with a long time frame, what is specified in the management plan may become obsolete necessitating regular updates.
- g. NF considers that a map of habitat types (including rank grass) would be needed to determine where arboreal nest checks are required, and where ground nest checks are needed and would need to be updated if conditions at the site change.
- h. All agree: Any fauna management plan should include a map of the more "permanent" habitat, but needs to take account of changes to the site over time and account for changes in species management that might arise as a result of either habitat changes or technical advances.

UNCERTAINTIES

- 41. No uncertainties applying to this issue were identified.

IMPORTANCE

- 42. The management plans are the vehicle for achieving the ecological outcomes upon which the assessment of effects is based. There needs to be certainty with respect to the outcome of species (and other ecological) outcomes to enable the decision maker to make an informed decision. There is disagreement as to when in the process the plans should be provided, but no disagreement as to the need for at least some management plans.

ISSUE 7 – Monitoring and Achieving Vegetation types and cover at Restoration/Offsetting sites

FACTS

43. No facts were identified in relation to this matter:

EXPERT OPINIONS

44. The following expert opinions were expressed in relation to this matter:

- a. TH considers that confirming that you have meaningfully achieved the offsets you have said you will achieve is a prerequisite of offsetting and this requires vegetation management and monitoring. The application proposes vegetation be monitored two yearly for five years. The goal is canopy closure, so the monitoring needs to be extended until closure is achieved, and infill planting and other management may be required to achieve the target.
- b. VK – substantial monitoring for the first three years whilst planting is ongoing to confirm planting is going according to schedule. If canopy cover and plant survival criteria are not met then monitoring needs to continue until it is, and then monitoring would cease.
- c. All agreed – monitoring should continue until the canopy cover (80%) and vegetation height (2m), absence of weeds (0% ecological weeds), plant survival (95%) and species richness targets are achieved to confirm that the offset target is delivered.
- d. All agreed – If a BOAM is required to be undertaken, the other attributes included as desirable above (i.e., ground cover, lianes and the like) are not captured by the targets listed in c) above. Once the targets listed in c) are achieved, the BOAM should be revisited and an assessment of how the other BOAM outcomes are being addressed undertaken. If those outcomes are not achieved, consideration should be given to what management is required to achieve the outcomes. This monitoring and adaptive management requires specific consideration in the offsets plan.

- e. All agreed - The ecological matters that require inclusion in a Management Plan (or their own plan) are bats, offsetting, ecological planting, pest animal and weed control, monitoring of restoration outcomes and methods for nest checks (e.g., timing, habitat maps, imposition of setbacks if nests are encountered).

UNCERTAINTIES

- 45. No material uncertainties were identified.

IMPORTANCE

- 46. Regular monitoring is required to ensure compliance with the relevant conditions and that the anticipated outcomes are being achieved. This needs to be enshrined in the conditions and provided for in the management plans.

ISSUE 8 - Pest Control

FACTS

- 47. The following facts are agreed in relation to this matter:
 - a. Pest control is initially about ensuring plantings survive and grow.
 - b. Regarding vegetation offsets, control of pest browsers (e.g. rabbits and hares), would be the main focus in the ecological management plan (control of pest mammals to improve lizard survival was covered in the lizard conferencing).
 - c. There is not much that can practically be done about mammals at this site because of the expected presence of domestic pets.

EXPERT OPINIONS

- 48. The following expert opinions were expressed in relation to this matter:
 - a. All agreed that there has been no thought given to long-term mammalian pest control at this site with regards to increased predation risk for

indigenous birds and invertebrates. Pests from the site are unlikely to cross SH59 to reach SNA 27, therefore, for the SNAs on the eastern side of SH59 there is a permanent and cumulative effect that hasn't been addressed. There were no recommendations, but this matter warrants further consideration as to whether and how it can be addressed.

UNCERTAINTIES

49. No material uncertainties were identified in relation to this matter.

IMPORTANCE

50. Mammalian pests (mustelids, rodents, possums, cats, hedgehogs) adversely affect a wide range of indigenous fauna and disrupt natural ecological processes such as pollination, seed set and seed dispersal. Many indigenous species do not survive in the presence of even low levels of these mammalian pests.

References

We have referred to the following documents in our discussions:

- <https://www.doc.govt.nz/globalassets/documents/conservation/native-animals/bats/bat-recovery/protocols-minimising-risk-felling-occupied-bat-roosts.pdf>

Signed



Vaughan Keesing



Nyree Fea

A handwritten signature in black ink, appearing to read 'Tayla Hooker'.

Tayla Hooker

1 September 2026