

Mt Welcome - Response to Dr Bramley's Report

To: The Panel

From: Dr Vaughan Keesing

Date: 14.09.2026

Project title: Mt Welcome

This memorandum sets out my response to Dr Gary Bramley's report (dated 7 September 2026).

Terrestrial ecology

In regard to the terrestrial ecology section of Dr Bramley's report (page 4), I agree with Dr Bramley that the proffered BOAM model will clarify the offset ratio and the panel just needs to determine which areas/ types of vegetation clearance are required to be offset.

Application of the EIANZ EcIA Guidelines

In relation to the EIANZ EcIA Guidelines section of Dr Bramley's report, I support Dr Bramley's note that assessing magnitude of effect is not (typically) undertaken at the Zone of impact (ZOI) but at some ecologically relevant determined scale, based on the same scale at which the values assessment is undertaken. I consider that is exactly what I have done at an appropriate scale, i.e. the scale relevant to all those faunal and vegetative interactions that influence pollination, seed dispersal flight distances etc.

My assessment¹ (section 5.1, 5.3, 5.5, 6.6.2) identifies the avoidance measures undertaken, then identifies the remedies possible (for streams and wetlands) i.e. the areas indicated as conservation covenants within the footprints of retention wetlands where existing wetlands are being retained and remediated. (section 8.2, 10, 11.2), and finally the offsets required because they are not like for like or replacements of what is affected. In any case, the effects are managed to achieve *gains* in values compared to that which are currently present.

Aquatic ecology

I notice that Dr Bramley, in the aquatic ecology section, suggests that the retention wetlands as aquatic habitat for fish are not technically offsets because they are not like for like, but I wonder if he meant they are not remedies because of that factor and are instead offsets.

In any case, areas of fish habitat of low quality are proposed to be substituted by more and better quality habitat of a different technical type (lentic instead of lotic). Both are suitable for the fish species that have been recorded as being present.

The most germane question is whether those areas of low quality fish habitat are required to be cleared of sediment periodically, as if they were, that would represent periodic disturbance. However, I consider that all

¹ Mt Wellington Station Ecology, 20 November 2025, Available at:
https://www.fasttrack.govt.nz/__data/assets/pdf_file/0017/24461/Appendix-15-Ecological-Assessment.pdf

areas of remediated and offset wetlands can accommodate the anticipated loads of sediment without the need for mechanical clearance, noting sediment loads will be reduced through retirement of land from farming and the significant amount of additional landcover shown in the Landscape and Ecology Plans. I consider that the fish habitat provided by the proposal will be a net improvement on the current situation.

Wetlands

In regard to wetlands, Dr Bramley raised the question as to the type of effects management that the retention wetlands are. I have stated that, in terms of wetlands, most of the area is remediation

My approach to effects management

I note that the NPS FM effects hierarchy says avoid, then minimise, then remedy, then where residual effects are more than minor, offset. I consider that after avoiding what wetlands could be avoided and minimising the extent of effect, the retention wetlands instead of being simply attenuation ponds are to be developed as wetlands (over the top of what now are low quality pastoral wetlands) and that is a remedy (a fix) of the areas indicated as conservation covenants within the footprints of retention wetlands where existing wetlands are being retained. (but made larger than those that currently exist). But where the reclaimed wetlands sum to much more than these retention wetland areas that is the residual effect (and is more than minor) and so, following the NPS FM, requires an offset. The further revegetation and enhancement of the remaining wider site wetland gullies is then that offset (a measured amount relative to the affected and outside of the direct impact footprint).

Response to Dr Bramley

In the section of Dr Bramley's report with the heading "does it matter?", Dr Bramley suggests that the wetland offset (and I am not clear if he is considering the retention wetlands here which I think he may be) do not meet the NPS FM offset principles But then he says they do not need to meet these principles as they are mitigation.

If he means the wider wetland recreation / enhancements (which are my offsets) then they do meet the NPS FM offset principles because they, to use Dr Bramley's words, "allow the total destruction of an ecosystem on one site in exchange for "fixing" or creating a similar ecosystem at a separate site". The wetlands reclaimed at one place are offset by fixing poor quality ones (same type) in a different area (I do not believe "site" means property boundaries).

I think in the end he agrees with my approach to mitigation and offsetting when he states: "Given the ecological context of the Mt Welcome site (highly degraded wetlands, limited indigenous vegetation, poor ecological connectivity and the presence of probably low numbers of indigenous fauna including birds and lizards), the second approach seems more reasonable". That is the retention wetlands are remedies and the rest of the enhancements are offsets.

I am unclear however why Dr Bramley comes back to mitigation on page 10 when the NPS FM hierarchy is avoid, minimise, remedy, offset, compensate. Again I stress the retention wetlands are remedies for wetlands and can be interpreted as remedy or offset for streams but the excess wetland created beyond the remedy of the directly affected wetlands (the 0.5ha) then goes into the offset pot for the reclaimed wetlands elsewhere – with the wider gully wetland enhancements).

At the end I think he agrees that the effects management for the values on site regardless of the names is sufficient (BOAM model results notwithstanding).

DOC's response on mitigation vs offsetting

DOC's Ecologist, Dr Kathryn Collins, (page 18) and Planner, Mr Ronan Whitelock, (page 26), disagree with Dr Bramley's suggestion that the wetland creation and riparian planting are mitigation rather than offsetting, on

the basis that the location of the proposed wetlands within or outside the project site does not determine their position in the effects management hierarchy.

I agree with Dr Collins and Mr Whitelock that the location of the proposed wetlands within or outside the project site does not determine their position in the effects management hierarchy. That is, I do not consider that everything occurring within a site is automatically mitigation.

For the reasons outlined above:

- the areas indicated as conservation covenants within the footprints of retention wetlands where existing wetlands are being retained (but made larger than those that currently exist) are a remedy (a fix).
- the further revegetation and enhancement of the remaining wider site wetland gullies is an offset (i.e. revegetation and enhancement outside of the direct impact footprint which is relative to the area affected).

Yours Sincerely

A handwritten signature in blue ink, appearing to read 'V. Keesing', with a stylized flourish at the end.

Dr Vaughan Keesing

BlueGreen Ecology.

14.09.2026