



Response to Dr Bramley’s Ecological Report

Prepared for:	Porirua City Council	Reviewed and approved for release by:  Nick Goldwater Senior Principal Ecologist
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1.0 Introduction

An application for resource consent under the Fast-track Approvals Act 2024 is being sought by the Pukerua Property Group Partnership for a staged 949 lot residential subdivision at 422 State Highway 59, Pukerua Bay.

On behalf of Porirua City Council, I was invited to review the assessment of ecological effects prepared by BlueGreen Ecology Limited that formed part of the application (Appendix 15). Following expert conferencing, with myself, representatives of the Department of Conservation, the applicant’s ecologist, and Dr Bramley, to resolve outstanding herpetofauna and other terrestrial ecology matters, Dr Gary Bramley prepared an advisory report to assist the Panel in reaching its decision with respect to the application (7 September 2026). This memo provides my response to that report.

2.0 Review of Report

I have read the report, which is clear, concise and well-informed, and I am generally in agreement with Dr Bramley’s conclusions and advice. I have prepared two comments to be considered by the Panel alongside Dr Bramley’s advice.

Comment 1

The final paragraph of the Terrestrial Ecology section (page 5) mentions 25.8 hectares of ‘native vegetation planting’ that could be considered as an offset for loss of indigenous vegetation (as described in the Landscape and Ecology Plans, Appendix 23 of the application). As raised in Point [9] of Minute 18 of the Expert Panel (4 September 2026), it is unclear if the proposed planting and regeneration of slopes adjacent and above the proposed retention wetlands could be considered as additional ecological offsets.

It is also unclear what areas Dr Bramley is referring when he states an additional “planting of 25.8 hectares of native vegetation across the Site”. I have studied the Landscape and Ecology Plans and believe Dr Bramley may be referring to the terrestrial plantings on sheets L5.00-L5.05. More details are needed to understand Dr Bramley’s estimate of 25.8 hectares, in particular, which areas are being referred to. Once these details are made clear, a review of the possible ecological utility of these plantings can be made.

However, in theory, if certain areas of amenity plantings were to have the dual intention to also provide for ecological outcomes, then yes, it is possible that some of these plantings could be appropriate as ecological offsets. As necessary steps in any such assessment, I would need to consider their proposed management (e.g. planting and monitoring schedules), their size and configuration, the proposed legal mechanism(s) for protecting these areas in perpetuity, and to check that the original purpose of these plantings is not to mitigate for other activities (e.g. sediment control, landscape effects, etc) to ensure there is no double-counting of mitigation measures.

**Comment 2**

On page 11, Dr Bramley concludes that offset models should not be treated as “crystal balls predicting exact ecological outcomes which can be relied upon”, and should instead be used to guide the expert’s opinion on what might be ecologically acceptable at the site. I agree with this sentiment. Offset model outputs should never be blindly accepted and they should instead be one of many tools that the expert employs to decide what is most appropriate at the site. To that end, the first step in my review of Dr Keesing’s Biodiversity Offsetting and Accounting Model will be to ensure that the selection of model inputs is valid (e.g. the Attributes, Benchmarks, Areas for Impact and Offset sites, etc), and to carefully check that the model data fairly represents the losses and gains for indigenous vegetation at the site.

These two comments are my only responses to Dr Bramley’s report.

