



MEMO

TO Shannon Watson
COPIED TO Philippa Crisp
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Eastern Bays Shared Path notified consent – Review of Appendix C, An assessment of ecological effects of the proposed Eastern Bays Shared Path Project on coastal vegetation and avifauna

Hutt City Council is proposing to construct a shared path for pedestrians and cyclists along the coastal edge of the eastern bays of the Wellington Harbour Te Whanganui-a-Tara. This development is envisaged in two parts, the northern section from Point Howard Ngau Matau to Sunshine Bay (3.29km) and a southern section at Windy Point (513m). As part of their application Hutt City Council received an expert assessment of the potential impacts on the coastal vegetation and the avifauna by Fred Overmars on 11 April 2019. In this assessment the potential impacts on the avifauna were split into a review of the effects on little penguins and all other avifauna. My review of this assessment is presented in four parts to cover the assessed impacts on (1) coastal vegetation, (2) general avifauna, (3) little penguins and (4) other wildlife not assessed.

Coastal vegetation

The report identifies one Threatened and eight At Risk plant species in the project area, but notes that all individuals, except for those of the seagrass (*Zostera muelleri sub sp. Novazelandica*), have been planted as part of restoration or landscaping plantings. All of these planted specimens can be feasibly relocated or replaced with cultivated material.

The report only identifies one threatened ecosystem, the gravel beach as defined by Holdaway, Wiser and Williams (2012). This ecosystem does not appear in more recent classifications of rare and naturally uncommon ecosystems in New Zealand (Wiser et al 2013); having been subsumed into the category of shingle beaches which have been assessed to be Threatened: Nationally Endangered (Ministry for the Environment and StatsNZ 2015). This carries the same threat status as gravel beaches, so the difference in naming is semantic, but worth noting. More importantly, for the shingle

beaches in the Shared Path Project area to be considered threatened ecosystems they need to support communities of plants and animals adapted to that habitat. The assessment does not outline the composition of these ecosystems, other than to note a “predominance of introduced species”. This is not atypical of coastal environments but does not tell us whether the shingle beaches in the project area should be considered as Threatened. A species inventory is needed for this purpose.

While not listed as a rare or naturally uncommon ecosystem, the seagrass communities in Lowry Bay should be accorded threat status on the basis of their defining species (i.e. the seagrass) being listed as At Risk: Declining. This is most likely a result of the terrestrial focus of the expert-driven process followed to identify these ecosystems, rather than the uniqueness and importance of the ecosystem itself. Seagrass is also listed as a habitat with significant indigenous biodiversity values in the coastal marine area in Schedule F5 of the Proposed Natural Resources Plan for the Wellington Region (Greater Wellington Regional Council 2015). This means that any impact on the seagrass habitat would be considered a non-complying activity under Rule R162 of this plan. Given that this is the only known remaining occurrence of seagrass in the Wellington Harbour, more is required than just demarcating its extent to mitigate the risk. If works are to be allowed in the seagrass habitat, there should be an environmental officer on duty to ensure that no more than the consented area at the southern-most extent of its distribution be disrupted during works and the deposition of sediment from works onto the seagrass beds be monitored and work halted if plants are being smothered. Work should only be allowed to resume once natural flushing of the sediment has occurred.

General avifauna

Based on the species listed in the assessment, there are three broad feeding guilds of birds in the project area: (1) the offshore fishers (e.g. shearwaters and terns), (2) the inshore fishers (e.g. shags) and (3) the shoreline foragers (e.g. gulls and oystercatchers). Impacts on the first two groups are likely to be temporary, but the impacts on the shoreline foragers may result in a permanent reduction in habitat. While there appear to be few birds nesting in the project area, there are important shoreline foraging grounds that may be lost. The report details the numbers of birds, but this data is quite old in some cases, and does not provide a complete picture of the populations through the year. The Birdlife New Zealand (a.k.a. the Ornithological Society of New Zealand) is currently redoing its harbour bird counts, but this data is not going to be available in time to inform this consent. The current number of birds also does not reflect the potential of the habitat that may be lost. What is needed is an assessment of the current extent of shoreline foraging habitat and the amount of habitat that will be lost to the development. This loss may then be offset by excluding dogs and pest animals to create the equivalent extent of suitable habitat further south.

Little penguin

The assessment claims that only two breeding sites for little penguin (*Eudyptula minor*) will be lost to the development. This is easily mitigated, but does not capture the full extent of the impact on this population. The works stand to impact more than 100 birds (based on the estimate of 50-60 penguin pairs in the project area, not accounting for the juveniles and singletons) which is a significant

portion (12-14 percent) of the population in the harbour. The assessment claims that the 24 nesting sites within 50m of the project area is a small impact, however the emerging standard (as advised by the Department of Conservation – e.g. in response to a development application on the Kaiwharawhara spit) is to consider effects within 100m of nesting shorebirds and should be reassessed.

Even outside of the breeding season, penguins need place to come ashore to roost. The works are set to result in a net loss of 440m of accessible coastline (520m lost minus 80m gained). This translates into a 35 percent reduction in accessible coastline from 34 percent to 22 percent accessible across the project area (interpreted from section 8.2.6). It is not clear how much of this will be, or could be mitigated by the addition of landing structures to allow penguins to come ashore.

In reality though, the addition of landing structures would only serve to maintain the human/wildlife conflict situation that exists around the eastern bays and has reportedly resulted in at least 20 little penguin mortalities between mid-2015 and mid-2018 (section 8.2.3). Similarly, the continued use of stormwater infrastructure is inappropriate and should not be maintained by the Shared Path Project. Instead, the more than minor impact that this development is going to have on the little penguin population should be offset by providing equivalent, appropriate habitat along this coastline for little penguin to nest and roost safe from humans, dogs, cars, pest animals and sea level rise.

Other wildlife not assessed

Reptiles

The Cobham Drive cycleway development across the harbour displaced a large population of northern grass skink (*Oligosoma polychroma*). This species, along with copper skink (*Oligosoma aeneum*) and common gecko (*Hoplodactylus maculatus*) may be present in the project area and should be surveyed for. If they are found to be present a translocation plan should be prepared in conjunction with the Department of Conservation.

Seals

Wellington Harbour Te Whanganui-a-Tara is home to a population of New Zealand fur seals (*Arctocephalus forsteri*). They are resident on the islands in the harbour, but seldom come ashore on the mainland. Although an unlikely scenario, works should be halted if seals approach the inshore environment. Consideration should also be given to mitigating human/wildlife conflict in the operational phase.

References

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