

**BEFORE THE TARANAKI REGIONAL COUNCIL AND NEW PLYMOUTH  
DISTRICT COUNCIL**

**MT MESSENGER BYPASS PROJECT**

In the matter of the Resource Management Act 1991

and

In the matter of applications for resource consents, and a notice of requirement by the NZ Transport Agency for an alteration to the State Highway 3 designation in the New Plymouth District Plan, to carry out the Mt Messenger Bypass Project

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**SUPPLEMENTARY STATEMENT OF EVIDENCE OF CORINNE HANNAH  
WATTS (TERRESTRIAL INVERTEBRATES) ON BEHALF OF THE NZ  
TRANSPORT AGENCY**

17 July 2018

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## TABLE OF CONTENTS

INTRODUCTION .....	2
SCOPE OF EVIDENCE .....	2
TERRESTRIAL INVERTEBRATES EVIDENCE IN LIGHT OF UPDATED RESTORATION PACKAGE.....	2

## INTRODUCTION

1. My full name is Corinne Hannah Watts.
2. My supplementary evidence is given in relation to applications for resource consents, and a notice of requirement by the NZ Transport Agency ("the **Transport Agency**") for an alteration to the State Highway 3 designation in the New Plymouth District Plan, to carry out the Mt Messenger Bypass Project ("the **Project**").
3. I have the qualifications and experience set out in my statement of evidence in chief ("**EIC**") dated 25 May 2018.
4. I repeat the confirmation given in my EIC that I have read the 'Code of Conduct' for expert witnesses and that my evidence has been prepared in compliance with that Code.
5. In this evidence I use the same defined terms as in my EIC.

## SCOPE OF EVIDENCE

6. The purpose of my supplementary evidence is to assess the updated mitigation, offset compensation package proposed on terrestrial invertebrates.

## TERRESTRIAL INVERTEBRATES EVIDENCE IN LIGHT OF UPDATED RESTORATION PACKAGE

7. Mr MacGibbon sets out the updated restoration package in detail in his supplementary statement of evidence.
8. In my EIC, I stated that I expected that the Restoration Package (as it was proposed at that time) would "*have beneficial effects for terrestrial invertebrates, through pest management, restoration plantings, and habitat enhancements.*"
9. I went on to say:  
  

*"As there is a strong correlation between invertebrate assemblages and habitat structure, enhancements to habitat quality will benefit invertebrates. I support the mitigation and offset package which has been proposed, which in my opinion represents a sound and appropriate response to the effects of vegetation removal potentially affecting the terrestrial invertebrate communities during construction activities."*
10. This remains my view following the updates to the Restoration Package. In summary, as set out in my EIC, any effects of the Project on terrestrial invertebrates are likely to be negligible (and may be positive) in the medium term.<sup>1</sup>

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<sup>1</sup> Paragraph 15 of my EIC.

11. Below I comment specifically on the impact of the much larger pest management area, and on the proposed fenced lizard enclosure.

### **Pest Management Area**

12. The main update to the Restoration Package is the increase in the size of the pest management area, from 1085ha to 3650ha.
13. In my EIC, I explained that "*the interactions between reducing mammal densities and resident invertebrate populations can be complicated and complex to predict*".
14. Noting that complexity, my EIC then records my support for the pest management programme, as follows:

*"There is a clear link between the health of vegetation communities, and the health of invertebrate communities. The pest management programme will lead to significant enhancement of the health of the vegetation communities in the area subject to management. That is expected, in turn, to lead to benefits for invertebrate communities."*

15. This assessment stands, in light of the increase in the pest control area to 3650 ha. As the revised area being proposed for pest control has significantly increased, I expect the proposed pest control within the pest management area will benefit more invertebrates and likely result in an increase in the variety of invertebrate community types being protected.

### **Fenced lizard enclosure**

16. Mr MacGibbon and Mr Chapman explain in their supplementary evidence the proposal for the establishment of a predator-proof fenced enclosure of at least 1 ha of native forest. This enclosure is proposed as part of the Restoration Package in order to benefit lizards. This fenced enclosure, which will exclude mice as well as other mammalian predators, will also likely have benefits for invertebrates by removing mice as a predator within that particular environment.<sup>2</sup>

**Corinne Watts**

**17 July 2018**

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<sup>2</sup> As set out in my EIC, mice could potentially be an issue for invertebrates where other mammals are controlled.