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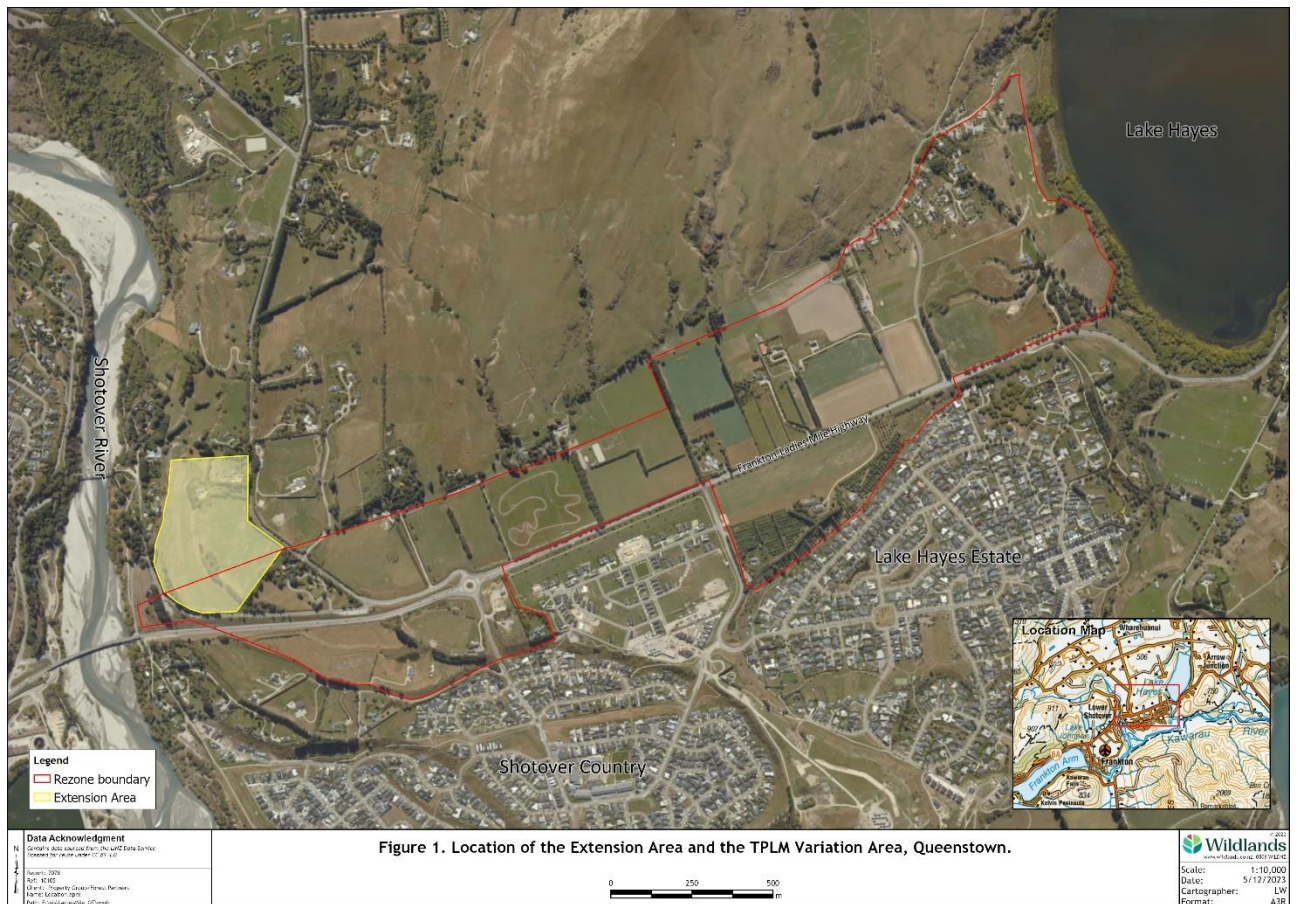
Dear Werner

TE PŪTAHI LADIES MILE PLAN VARIATION – ASSESSMENT OF EXTENSION AREA AT 63 LOWER SHOTOVER ROAD

Queenstown Lakes District Council (QLDC) is currently processing a proposed plan change for an area of land at Ladies Mile in Queenstown, referred to as the Te Pūtahi Ladies Mile Plan Variation Area (TPLM Variation Area). As part of QLDC's process, an ecological assessment of the TPLM Variation Area was undertaken by e3Scientific (2020). Subsequent to this, Dawn Palmer (Palmer 2023) prepared expert ecological evidence for the QLDC hearing, scheduled for December 2023. The expert evidence of Palmer (2023) concluded that the TPLM Variation Area does not meet any of the significance criteria in Appendix 1 of the National Policy Statement for Indigenous Biodiversity (NPS-IB), and is therefore not a Significant Natural Area (SNA).

The Property Group on behalf of their client is seeking the inclusion into the TPLM Variation Area of an additional parcel of land that directly neighbours the TPLM Variation Area at its northwestern end (Figure 1). This parcel of land is referred to as the Extension Area. The southern part of the Extension Area was included in the assessment area of e3Scientific (2020), although no site visit was undertaken within the Extension Area itself. The Extension Area is likely to contain vegetation and habitats similar to those of the TPLM Variation Area.

The Property Group has engaged Wildland Consultants Ltd to undertake an ecological assessment of the Extension Area, to confirm that the conclusions reached by Palmer (2023) regarding the ecological significance of the TPLM Variation Area also apply to the Extension Area. This letter outlines the findings of this ecological assessment, and compares the ecological values of the Extension Area with those of the TPLM Variation Area.



SITE INSPECTION

The Extension Area was visited on the afternoon of 2 December 2023. All areas of the property were inspected on foot, except for the residential dwellings and gardens at the northeast of the property, which were visually inspected from the adjoining paddocks and road frontage.

The eastern part of the property contains a broad gently rolling terrace, which extends eastwards and southwards into the adjoining TPLM Variation Area (Plate 1). A moderately steep terrace escarpment drops to the west of this terrace, to a relatively narrow flat terrace at the west of the Extension Area (Plate 2). The two terraces are fenced into paddocks which are used for cropping and/or pastoral farming, with the exception of the residential dwellings and gardens at the northeast of the upper terrace. Shelterbelts of exotic trees are present around the boundaries, and along portions of the top of the terrace scarp.

Vegetation and habitats

At the time of the inspection, the paddocks on the two terraces were bare following recent spraying and ploughing. The uncultivated margins of paddocks contain Californian thistle (*Cirsium arvense*), Scotch thistle (*C. vulgare*), hemlock (*Conium maculatum*), stinging nettle (*Urtica incisa*), and occasional exotic pasture grasses including tall fescue (*Lolium arundinaceum*), cocksfoot (*Dactylis glomerata*) and annual poa (*Poa annua*). Shelterbelts around the boundaries of the paddocks comprise a mix of exotic trees including Douglas fir (*Pseudotsuga menziesii*), poplar (*Populus* spp.), hawthorn (*Crataegus monogyna*), buddleia (*Buddleja davidii*) elderberry (*Sambucus nigra*), oak (*Quercus* spp.), and *Prunus* species. A shelterbelt also runs along the top of the southern part of the terrace scarp, and contains

poplar, weeping willow (*Salix babylonica*), radiata pine (*Pinus radiata*), and blue gum (*Eucalyptus globulus*).

The terrace escarpment itself is dominated by tall hemlock, Californian thistle and exotic pasture at its northern end, and exotic pasture at its southern end. The central portion of the terrace scarp contains dense Californian thistle, hemlock, St John's wort (*Hypericum perforatum*) occasional Scotch broom (*Cytisus scoparius*) and sweet briar (*Rosa rubiginosa*), and five mature tūmatakuru/matagouri (*Discaria toumatou*) (Plate 3).

Residential properties contain a diverse exotic treeland that includes Douglas fir, oak, silver birch (*Betula pendula*), weeping willow, rowan (*Sorbus aucuparia*), *Thuja* species, *Photinia* species, macrocarpa (*Hesperocyparis macrocarpa*), and a few tī kōuka/cabbage tree (*Cordyline australis*). Periwinkle (*Vinca major*), Franchet's cotoneaster (*Cotoneaster franchetii*) and Scotch broom are also present. Other species not listed here are also likely to be present around the dwellings.

Fauna

No indigenous birds were observed on the Extension Area during the site visit, despite favourable calm and warm conditions. Exotic species observed included the introduced and naturalised blackbird (*Turdus merula*), starling (*Sturnus vulgaris*), house sparrow (*Passer domesticus*), chaffinch (*Fringilla coelebs*), and skylark (*Alauda arvensis*).

No lizards were observed during the site visit. McCann's skink (*Oligosoma maccannii*) was observed by e3Scientific (2020) on the adjoining property to the south, within the rank grass along the road berm. Low quality habitat for McCann's skink is present within the Extension Area in taller vegetation along the terrace scarp.

Several rabbits were observed during the site visit. The terrace scarp also contained abundant rabbit pellets and burrows, suggesting relatively high numbers of rabbits are present.

COMPARISON OF EXTENSION AREA WITH TPLM VARIATION AREA

Landforms

The Extension Area occurs on the same landform units as the TPLM Variation Area. The majority of both areas are located on the relatively flat terrace that runs between the Shotover River and Lake Hayes. The terrace escarpment and lower terrace at the Extension Area have been formed by the Shotover River cutting into this slightly higher terrace, and "Property 1" within the TPLM Variation Area is also on this landform (e3scientific 2020).

Vegetation and habitats

The vegetation and habitats in the Extension Area are very similar to those described in the TPLM Variation Area (e3Scientific 2020; Palmer 2023). Both areas contain a predominance of exotic-dominant vegetation communities, mainly comprising pastoral farmland and shelterbelts of exotic trees. Species compositions of these communities in both areas contain the same general suite of species. For example, Properties 1 and 2 in the TPLM Variation Area (directly adjoining the Extension Area) contain paddocks of exotic grasses, exotic herbs

including hemlock and St John's wort, and exotic trees of Douglas fir, blue gum, hawthorn, poplar, and elderberry (e3scientific 2020, pages 8-9). A few scattered matagouri are present in the Extension Area, and at several other properties at the east and south of the TPLM Variation Area (e3scientific 2020; Palmer 2023.).

Fauna

Given the similarity in landforms, vegetation and habitats between the Extension Area and the TPLM Variation Area, it is entirely reasonable to assume that the fauna utilising the two areas will also be very similar in species composition, abundance, and patterns of habitat utilisation. This includes possible McCann's skink, common indigenous and exotic birds of scrub and open grassland, and indigenous highly mobile fauna (black-fronted terns [tarapirohe, *Chlidonias albobriatus*], blackbilled gulls [tarāpuka, *Chroicocephalus bulleri*] and South Island pied oystercatchers [tōrea/SIPO, *Haematopus finschi*]) as described in e3scientific (2020) and Palmer (2023).

Ecological Values

The Extension Area shares the same key ecological values as the TPLM Variation Area. Both are dominated by highly modified exotic vegetation communities, and ecological values present are associated with the matagouri and the avifauna species and habitat. The summary of ecological values in the TPLM Variation Area given in Palmer (2023), paragraph 43, is considered equally applicable to the Extension Area. This summary of ecological values is reproduced here:

- (a) "Matagouri has a conservation status of At Risk – declining. This classification is a result of the loss and continuing decline of this species in the North Island. Matagouri is not threatened for most of its range, however, it has become very uncommon in the North Island, and is now known at only a few sites. In the South Island it is found mainly east of the main divide and is a common species within Otago and the shrublands in the Lakes Ecological Region and Shotover Ecological District.
- (b) The At Risk – declining SIPO was observed by the e3 ecologist, but the location was not identified. I can confirm they have been observed foraging on the northern paddock of Property 7 and 516 Ladies Mile.
- (c) The At Risk - declining black billed gull (the Conservation Status of this species was changed from Threatened – Nationally critical following the e3 Report [Robertson *et.al.*, 2021]). This species was observed by me foraging on 516 Ladies Mile but noted as present but not observed in the e3 Report.
- (d) The Threatened – nationally endangered black-fronted tern. This species was observed by me foraging on 516 Ladies Mile but noted as present but not observed in the e3 Report." (Palmer 2023, pages 10-11).

Palmer (2023) provides further detailed analysis of the ecological values on the land within the TPLM Variation Area, and concludes, "I support the e3 Report assessment of the overall ecological value of the land within the TPLM Variation Area as moderate because the land supports a few matagouri but more importantly, contributes occasionally and fleetingly to the foraging habitat of threatened and at-risk specified highly mobile bird species" (Palmer 2023, paragraph 53, page 13). Based on the assessment outlined in this letter, this conclusion also applies to the ecological value of the Extension Area.

ECOLOGICAL EFFECTS OF DEVELOPMENT

Palmer (2023) and e3Scientific (2020) outline potential effects of development on ecological values, and these same effects are relevant within the Extension Area.

In regards to matagouri, both reports have recommended avoiding removal of matagouri where possible, along with its replanting and the use of other indigenous species in the landscaping of open spaces such as on terrace escarpments at the east of the TPLM Variation Area. Palmer (2023) concludes that with these actions in place, the impacts of development on matagouri will be less than minor and would result in a net gain for this species. The terrace escarpment within the Extension Area contains five scattered matagouri, and this escarpment would provide an ideal location for replanting. Replanting would result in a net gain for this species and for indigenous biodiversity in general within the Extension Area.

Palmer (2023) provides detailed commentary on the potential effects of the development on specified highly mobile fauna within the TPLM Variation Area, and concludes that the overall effect of loss of foraging habitat is estimated to be low (Palmer 2023, page 30, paragraph 101). Specifically, in regards to SIPO nesting, Palmer (2023) concludes that, “in my opinion, the likelihood of SIPO being able to nest successfully (fledge young) in this location is low, or put another way, reasonably vulnerable to failure” (Palmer 2023, page 16, paragraph 63). This reflects the current land use in the TPLM Variation Area of land cultivation, mowing, vehicle use and stock disturbance. These same current land use practises are undertaken in the Extension Area, within habitats very similar to those in the TPLM Variation Area, and therefore the conclusions of Palmer (2023) will also be applicable to the Extension Area.

ECOLOGICAL SIGNIFICANCE ASSESSMENTS

Palmer (2023) concludes with a discussion of whether or not the TPLM Variation Area falls within the NPS-IB criteria of an SNA, or an area used by specified highly mobile fauna. The assessment of Palmer (2023) concludes that none of the four significance criteria or their attributes are met within the TPLM Variation Area. The assessment notes that while SIPO, terns and gulls have been observed within the area, the area does not provide a “habitat” for these birds as it is defined in the NPS-IB, because there is no evidence to suggest their use is anything but fleeting. The assessment also notes that no nesting of these birds has been observed in the area, and any potential nesting would have a high probability of failure due to current land use.

In regards to matagouri, Palmer (2023) concludes that this species does not meet the criteria for a SNA on the basis of clause 1(3) of Appendix 1 of the NPS-IB, and notes that matagouri is secure in the South Island and is a common species within Otago and shrublands in the Lakes Ecological Region.

Given the similarities outlined in this letter between the Extension Area and the TPLM Variation Area, it is entirely reasonable to assume that the same significance assessment factors apply within the Extension Area as within the TPLM Variation Area. A significance assessment of the Extension Area using the criteria in the NPS-IB has been undertaken as part of this letter, and is summarised in Table 1 below. The Representativeness, Diversity and Pattern, and Ecological Context criteria are not met within the Extension Area. The Rarity and Distinctiveness criterion assessment in Table 1 has applied the detailed assessment of

specified highly mobile fauna provided by Palmer (2023), and this criterion is also not met for indigenous flora, fauna or specified highly mobile fauna within the Extension Area.

CONCLUSION

A site visit and ecological assessment of the Extension Area at 63 Lower Shotover Road has shown that the Extension Area contains landforms, land use activities, vegetation and habitats, and ecological values that are very similar to the TPLM Variation Area. On this basis, it is concluded that the conclusions reached by Palmer (2023) regarding the ecological value and significance of the TPLM Variation Area also apply within the Extension Area.

Yours sincerely



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Reviewed and approved for release by:



7/12/2023
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REFERENCES

e3Scientific Limited (2020): Ladies Mile Ecological Assessment. Contract report for Queenstown Lakes District Council, December 2020. 34 pp.

Palmer, D. (2023): Statement of Evidence of Dawn Alice Palmer 29 September 2023. In the matter of the Te Pūtahi Ladies Mile Plan Variation in accordance with section 80B and 80C, and Part 5 of Schedule 1 of the Resource Management Act 1991. Wynn Williams, Queenstown. 57 pp.



Plate 1: The upper terrace, looking north towards shelterbelts and gardens around the residential dwellings.



Plate 2: A view from the edge of the upper terrace adjoining the residential dwellings, looking southwest over the terrace escarpment and lower terrace.



Plate 3: A matagouri bush on the terrace escarpment, amongst Californian thistle. The lower terrace is visible in the background, with one patch of dense hemlock.

Table 1. Ecological significance assessment for the Extension Area, using the criteria from the NPS-IB.

Criterion	Definition	Comment	Criterion met?
Representativeness	<p>Representativeness is the extent to which the indigenous vegetation or habitat of indigenous fauna in an area is typical or characteristic of the indigenous biodiversity of the relevant ecological district.</p> <p>An area that qualifies as an SNA under this criterion has at least one of the following attributes:</p> <ul style="list-style-type: none"> - indigenous vegetation that has ecological integrity that is typical of the character of the ecological district. - habitat that supports a typical suite of indigenous fauna that is characteristic of the habitat type in the ecological district and retains at least a moderate range of species expected for that habitat type in the ecological district. 	<p>The property contains exotic-dominant vegetation communities, comprising cropping/pastoral land, shelterbelts of exotic trees, and thickets of hemlock and Californian thistle. Only five indigenous plants were observed on the property – all matagouri. These matagouri may be remnants of the former shrubland community that would have once been present within this area, or may have established more recently on the terrace escarpment. The few matagouri are within a matrix of Californian thistle and exotic grasses, and this vegetation community does not have ecological integrity typical of the character of the Shotover Ecological District.</p> <p>The highly modified pastoral environment does not support a typical suite of indigenous fauna of the Shotover Ecological District.</p>	No
Diversity and pattern	<p>Diversity and pattern is the extent to which the expected range of diversity and pattern of biological and physical components within the relevant ecological district is present in an area.</p> <p>An area that qualifies as a significant natural area under this criterion has at least one of the following attributes:</p> <ul style="list-style-type: none"> - at least a moderate diversity of indigenous species, vegetation, habitats of indigenous fauna or communities in the context of the ecological district. - presence of indigenous ecotones, complete or partial gradients or sequences. 	<p>The site has a very low diversity of indigenous species, vegetation and habitats, and no ecotones, gradients or sequences are present.</p>	No
Rarity and distinctiveness	<p>Rarity and distinctiveness is the presence of rare or distinctive indigenous taxa, habitats of indigenous fauna, indigenous vegetation or ecosystems.</p> <p>An area that qualifies as an SNA under this criterion has at least one of the following attributes:</p> <ul style="list-style-type: none"> - provides habitat for an indigenous species that is listed as Threatened or At Risk (declining) in the New Zealand Threat Classification System lists. - an indigenous vegetation type or an indigenous species that is uncommon within the region or ecological district. - an indigenous species or plant community at or near its natural distributional limit. - indigenous vegetation that has been reduced to less than 20 per cent of its pre-human extent in the ecological district, region, or land environment. 	<p>No Threatened or At Risk-Declining fauna were observed on the property during the site visit. South Island pied oystercatcher (At Risk-Declining), black-fronted tern (Threatened-Nationally Endangered) and black-billed gull (Threatened – Nationally Critical) have been observed elsewhere in the TPLM Variation Area within similar environments, and it is likely that these species also utilise the flat paddocks on the property occasionally. However, based on the best available information of utilisation patterns of these species in the district (Palmer 2023), it is highly likely that the property is used by these species only fleetingly and sporadically. Based on this, the conclusion reached by Palmer (2023) is assumed to apply to the Extension Area; i.e., the</p>	No

	<ul style="list-style-type: none"> - indigenous vegetation or habitat of indigenous fauna occurring on naturally uncommon ecosystems. - the type locality of an indigenous species. - the presence of a distinctive assemblage or community of indigenous species. - the presence of a special ecological or scientific feature. 	<p>TPLM Variation Area does not provide a “habitat” for these birds as it is defined in the NPS-IB because there is currently no evidence to suggest their use is anything but fleeting.</p> <p>Five mature plants of matagouri (At Risk-Declining) are present on the property, all on the central portion of the terrace escarpment. Matagouri at the property does not meet the criteria for an SNA on the basis of clause 1(3) of Appendix 1 of the NPS-IB. Matagouri is widespread and common in the eastern South Island, including within Otago and the Lakes Ecological Region.</p>
<p>Ecological context</p>	<p>Ecological context is the extent to which the size, shape, and configuration of an area within the wider surrounding landscape contributes to its ability to maintain indigenous biodiversity or affects the ability of the surrounding landscape to maintain its indigenous biodiversity.</p> <p>An area that qualifies as an SNA under this criterion has at least one of the following attributes:</p> <ul style="list-style-type: none"> - at least moderate size and a compact shape, in the context of the relevant ecological district. - well-buffered relative to remaining habitats in the relevant ecological district. - provides an important full or partial buffer to, or link between, one or more important habitats of indigenous fauna or significant natural areas. - important for the natural functioning of an ecosystem relative to remaining habitats in the ecological district. 	<p>The property contains exotic-dominant vegetation and habitats, mainly comprising cultivated fields, and is surrounded by residential properties and pastoral farmland. While close to the Shotover River, it is far enough away that it does not provide an important buffering function.</p> <p>The property does not meet any of the attributes of this criterion.</p>
<p>Is property significant?</p>		<p>No.</p>