

PROPOSED TE PŪTAHI LADIES MILE PLAN VARIATION

RESPONSE OF DAWN ALICE PALMER ON BEHALF OF THE QUEENSTOWN LAKES DISTRICT COUNCIL

- 1 My full name is Dawn Alice Palmer. I am a terrestrial ecologist and Director for Natural Solutions for Nature Limited.
- 2 I have prepared the following documents with regards to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**):
 - (a) A Limited Scope Peer Review of matters contained within an Ecological Report – Ladies Mile Masterplan dated 31 December 2021.
 - (b) Statement of evidence on behalf of Queenstown Lakes District Council (**QLDC** or **Council**) dated 29 September 2023;
 - (c) Rebuttal evidence on behalf of QLDC dated 10 November 2023;
 - (d) Summary of evidence dated 4 December 2023.

Response to matters raised during the Hearing

Response to Anna Hutchison Family Trust

- 3 Wildland Consultants Ltd (**Wildland**) have provided an ecological assessment of the Extension Area at 63 Lower Shotover Road (**The Wildland Report**) being the land included in the Anna Hutchinson Family Trust (**AHFT**) submission. The Wildland Report concluded that “the conclusions reached by Palmer (2023) regarding the ecological value and significance of the TPLM Variation Area also apply to the Extension Area.”
- 4 Table 1 of the Wildland Report provides a summary of the assessment of the ecological values of the AHFT Extension Area. The Wildland Report assessment of rarity and distinctiveness, refers to my peer review and evidence, as “the best available information of utilisation patterns” of South Island pied oystercatcher and black-billed gulls (At Risk – Declining), black-fronted terns (Threatened – Nationally Endangered). I note that the Wildland Report has not used the most recent threat classification for the black-billed gull in identifying it as Threatened - Nationally Critical.
- 5 The Wildland Consultant ecologist did not observe the braided river birds or other indigenous birds or lizard fauna on the AHFT Extension Area during their site visit, and noted the land had recently been sprayed and ploughed. No information was provided regarding whether the spraying was for pasture, weeds or pests. I consider that the use of pesticide would likely temporarily reduce the value of the land for foraging by braided river species. On the basis of their assessment, the reports prepared by e3 Scientific and myself, and my evidence, Wildland Consultants have concluded that there is “currently no evidence to suggest [the species] use is anything but fleeting”, and therefore presumably also using the definitions in Part 1.6 of the NPS-IB, does not constitute “habitat” for braided river birds. This finding is consistent with my own finding for the TPLM Variation Area. I have no reason to doubt the accuracy of the Wildland Report.
- 6 With respect to both my assessment and the Wildland Report assessment, the best available information on the seasonal habitat use by these species in the Whakatipu Basin cannot currently quantify a trend of population decline or increase for these species. Therefore, I have qualified my assessment of minor or less than minor

impact with the caveat that in the absence of better information, the species' use of the TPLM site is "fleeting".

Dawn Alice Palmer

21 December 2023