

PROPOSED TE PŪTAHI LADIES MILE PLAN VARIATION

SUMMARY OF EVIDENCE OF DAWN ALICE PALMER ON BEHALF OF THE QUEENSTOWN LAKES DISTRICT COUNCIL

1. As directed by paragraph 12.2 of Hearing Minute 1, I set out below a summary of the key points of my evidence. I have prepared a statement of evidence in chief dated 29 September 2023, and a statement of rebuttal evidence dated 10 November 2023. I did not receive any questions from submitters.

Succinct summary of key points of my evidence

2. The TPLM Variation Area is currently used in a manner consistent with its Rural Lifestyle zoning. For reasons detailed in my ecological report and evidence, it is my opinion, that the TPLM Variation Area is not a SNA or a significant habitat of indigenous fauna based on the near absence of indigenous vegetation (a few Matagouri are present), and only occasional and fleeting use of the land as part of a broader network of foraging habitat by braided river birds; black-fronted terns, black-billed gulls (least frequently) and South Island pied oystercatchers (**SIPO**) (most frequently). This use is both responsive to and dependent on land management and ground saturating rain. These species are not known to nest in the TPLM Variation Area.
3. There is no other expert giving evidence on the ecological effects of the TPLM Variation, accordingly, I have summarised the ecological effects of the Structure Plan and PDP Variation:
 - (a) Development that implements the Structure Plan will forego irretrievably, opportunities to undertake large scale restoration of indigenous biodiversity on a large portion of the land between Shotover River / Kimiākau and Lake Hayes/Te Whaka-ata a Haki-te-kura north of SH6.
 - (b) The development of the TPLM Variation Area will reduce the remaining network of potential foraging habitat for braided river birds in the Whakatipu Basin. The existing land uses in the TPLM Variation Area already limit use.
 - (c) However, foraging opportunities for seasonal migrants - braided river birds, will be retained within the open space precinct – 516 Ladies Mile. Depending on the ultimate configuration of the TPLM Variation area (e.g., parks and open space areas, school sports fields and the configuration and design of stormwater management units) the TPLM Provisions create opportunities for the reinstatement of indigenous biodiversity (plantings) in these areas so that

they contribute to habitat for smaller native birds more commonly associated with and tolerant of urban environments and urban/rural fringe habitats.

- (d) Incorporation of indigenous plants into landscaping and amenity areas, may result in a net gain in indigenous biodiversity. These habitats may provide “steppingstone” resting or foraging sites for birds moving through *or around* the area; therefore, a corridor of connectivity around and within this new urban setting may be sustained.
 - (e) Extension of predator control may lead to a state of enhancement benefiting the surrounding habitats. I also recommended that Council support advocacy regarding responsible pet management, to protect indigenous fauna and farm animals in the surrounding area.
 - (f) The provisions of the TPLM Variation (27.9.8.1.c.ii.c;) and the Guiding Principles for stormwater management require solutions that do not degrade the receiving environment of Lake Hayes. The system or series of stormwater systems *should* mimic ephemeral wetlands, as above, supporting the site’s contribution to surrounding habitats by providing “steppingstone” habitats between the Shotover and Kawarau rivers, Shotover Wetland, and Lake Hayes. These should be designed to reduce the risk of pollutants and rubbish discharges into the Lake Hayes Environment.
 - (g) The provisions in Chapter 33 of the PDP; 33.2.1.6, 33.2.1.7 and 33.2.1.9; will apply to the consideration of any development within, and the indirect or offsite impacts arising from the development of the TPLM Variation area. The stormwater designs will require an integrated approach. The provisions also provide for incorporation and enhancement of ecological processes and indigenous biodiversity within the context of the TPLM zone (27.9.8.1.h).
4. It is my opinion, based on my observations of the land values managed under the current land uses, that residual loss of habitat for indigenous birds including the braided river birds resulting from the TPLM Variation Structure Plan and Provisions will be less than minor or minor.
5. I reiterate that research is required to understand how to manage for the long-term retention of the full suite of local biodiversity and specified highly mobile species (NPS-IB, App. 2). I recommend a coordinated, multi-agency investigation into the use and importance of the broader network of habitats and the incorporation of outcomes from that research into other future planning processes.

Dated: 4 December 2023