

**BEFORE THE HEARING PANEL
FOR THE GORE DISTRICT COUNCIL PROPOSED DISTRICT PLAN**

UNDER the Resource Management Act 1991

IN THE MATTER Hearing Stream 10 - Biodiversity

**STATEMENT OF EVIDENCE OF ANDREW PETER WELLS
ON BEHALF OF GORE DISTRICT COUNCIL
ECOLOGIST
20 February 2025**

Introduction, Qualification and Experience

- [1] My name is Andrew Peter Wells. I have been employed by Wildland Consultants Limited (**Wildlands**) since 2022, based in Wānaka, and my current position is Senior Ecologist/Ecology Team Leader.
- [2] I hold the degrees of Bachelor of Forestry Science with First Class Honours (1995) from the University of Canterbury and Doctor of Philosophy (2000) in ecology from Lincoln University. I was later awarded a three-year Post-Doctoral Fellowship from the Foundation for Research, Science and Technology. Over the past 25 years I have worked for several Government Departments, Universities and private sector firms as a terrestrial ecologist undertaking ecological research, consultancy and teaching.
- [3] My work as an ecologist has covered a wide range of ecosystem types, including wetlands, grasslands, shrublands, forests, and alpine vegetation. This work has included ecological investigations in Buller, Westland, Canterbury, Otago and Southland. I am an author of over 150 contract reports covering these assessments.
- [4] Since 2008 I have completed ecological assessments of many large farming properties in inland Otago and Southland for which land use changes have been proposed. For the past three years I have also managed the 'Biodiversity Action on the Ground Programme', during which Wildlands has conducted ecological field surveys and reporting on approximately 300 rural properties throughout Southland on behalf of Environment Southland. These surveys have included mapping of vegetation and identification of significant indigenous vegetation and habitats. This experience gives me good understanding of the ecological values and farming regimes and practises within Southland.
- [5] I have regularly provided ecological support to regional and territorial authorities in Westland, Otago and Southland through technical reviews and compliance work. I have also completed ecological assessments of over 100 grazing licenses managed by the Department of Conservation, and provided expert advice on the long-term impacts of stock grazing on ecological values.

Code of Conduct for Expert Witnesses

- [6] While this is not an Environment Court hearing I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of Evidence

- [7] My evidence will address:
- (a) Background information regarding Wildlands' involvement in the District Plan review process.
 - (b) An overview and update of the district-wide indigenous vegetation mapping, including rationale for vegetation categorisation.
 - (c) My involvement in ecological survey of Wantwood Station.
 - (d) My review of the evidence of Glenn Davis in relation to Stoney Creek Station.
 - (e) My response to the ecological matters raised by the Department of Conservation (**DOC**) in their evidence.

Background and Involvement

- [8] Wildlands was engaged by Gore District Council in 2024 to provide ecological advice and input into the proposed Gore District Plan review process. Aspects of this input included the following.
- (a) Refinement of the desktop mapping of indigenous vegetation within Gore District, using the latest available aerial imagery, publicly available ecological survey reports, and input from the Biodiversity Working Group established by Council to progress significant natural area (SNA) mapping.
 - (b) Analysis of submissions on the proposed District Plan.

- (c) Participation in a working group comprising the Gore District Council and Hokonui Hills landowners. The group's objective was to develop planning provisions for the area that would provide certainty for farmers in relation to ongoing operations while also ensuring the overall maintenance of indigenous biodiversity. I worked with Glenn Davis, ecologist for Stoney Creek Station, on developing these provisions. As part of this process, I reviewed published ecological information for the Hokonui Hills, used aerial imagery to analyse present-day vegetation, examined the ecological information collected by e3Scientific and reported on in the evidence of Mr Davis, and attended a five hour site visit with the working group to Stoney Creek Station in July 2024.
- (d) Completion of a nine hour ecological assessment of Wantwood Station in October 2024, in the company of station owner Coral Macleod. During this site visit, areas of indigenous vegetation were inspected on foot and existing desktop mapping refined. Occurrences of At Risk and Threatened plants were noted.
- (e) The key conclusions of this evaluation were summarised in a memo provided to council dated 13 January 2025, and attached as Appendix C to the s42a report.

Vegetation Mapping

- [9] Gore District Council requested Wildlands to produce updated mapping of terrestrial indigenous vegetation within Gore District. This mapping sought to delineate areas of likely non-significant indigenous terrestrial vegetation (termed 'indigenous vegetation areas', or IVA), and areas of likely significant indigenous terrestrial vegetation (termed 'significant indigenous vegetation areas,' or SIVA). The SIVA are very likely to also be SNA as defined in the NPS-IB and to meet the significance criteria in the Southland Regional Policy Statement, subject to confirmation from field survey.
- [10] Note that wetland and riparian/riverbed habitats were beyond the scope of this assessment and were not mapped.

- [11] As of 14 February 2025, 13 landowners in Gore District have taken up Environment Southland's free ecological survey service as part of the Biodiversity Action on the Ground Programme. Survey and reporting on these properties are still in progress, and will be used to verify the desktop mapping and revise it where required. I understand that Environment Southland is continuing to approach other landowners in Gore District with SIVA mapped on their properties.

Vegetation Mapping and Survey of Hokonui Hills

- [12] I was commissioned by Council to assess vegetation in the Hokonui Hills (Stoney Creek Station and Wantwood Station), to inform discussions at the working group meetings.
- [13] In July 2024 vegetation was mapped using analysis of aerial imagery within ArcGIS, for all the area covered by Wantwood Station and Stoney Creek Station. Vegetation was also viewed with binoculars from public roads and walking tracks where possible, which allowed a large portion of the area to be viewed and aerial imagery analysis refined.
- [14] Three broad categories of vegetation community were identified from the aerial imagery analysis and binocular viewing:

1. High value indigenous vegetation – This vegetation is dominated by indigenous plant species which generally form a closed canopy. Cover abundance of indigenous plants is generally greater than 75%, and exotic grasses or other exotic species are only a minor component of the groundcover vegetation. This vegetation mainly comprises indigenous forest and scrub in gullies and south-facing hillslopes, but also includes areas of tussockland and shrubland on ridges and higher-elevation hillslopes.

Improved pasture is generally absent from these areas. Consequently, the vegetation has relatively high ecological integrity. While some non-forest areas may have once been maintained as improved pasture, the stage of indigenous vegetation succession indicates that a regular cycle of periodic maintenance of that pasture has not been undertaken for several decades. All these areas would meet at least one significance

criteria in the Southland Regional Policy Statement. These areas have been mapped as SIVA in Appendix G of the s42a report.

2. Mixed indigenous/exotic vegetation - This vegetation is co-dominated by indigenous shrubs and/or tussocks and exotic grasses. These areas were formerly improved pasture, but vegetation structure and composition indicate that establishment of indigenous species within the pasture has occurred over at least the past 30-40 years without regular maintenance of the pasture. Nevertheless, Improved pasture still generally forms the ground cover between shrubs and tussocks, with indigenous shrubs and tussocks forming a scattered upper tier. Overall, indigenous vegetation canopy cover is 25-50%, and improved pasture dominates the ground cover throughout. Patches entirely comprising improved pasture are present, and there are also small patches where indigenous vegetation forms a closed canopy. These areas are all currently grazed by stock. Ecological integrity is much lower than in the high value indigenous vegetation. These areas have been mapped as IVA in Appendix G of the s42a report.

3. Exotic grassland – This vegetation is predominantly exotic pasture species. Indigenous species are a minor component of the vegetation, generally occurring as scattered individuals and less than about 10% of overall cover. This vegetation would meet the definition in the NPSIB of regularly maintained improved pasture.

- [15] Areas of rocky habitat are also present across the Hokonui Hills, often on ridge crests. These areas generally contain mixed exotic-indigenous vegetation with grey shrubs prominent, and provide very important habitat for lizards. Because of the value of these areas as lizard habitat, all areas of rocky habitat were mapped as 'high value indigenous vegetation'.
- [16] During the site visit to Wantwood Station in October 2024, mapped areas of indigenous vegetation were inspected on foot and the mapping refined where required. Threatened or At Risk species observed were noted.
- [17] A few individuals of desert broom (*Carmichaelia petriei*; At Risk-Declining) were observed on one rocky ridge that was otherwise covered

in mixed indigenous shrubs and exotic pasture (type 2 vegetation above). This area was also distinctive for the presence of several kōwhai (*Sophora microphylla*) trees up to four metres tall. Based on these floristic features, this area of vegetation was mapped as high value indigenous vegetation.

- [18] No other plants listed as Threatened or At Risk in the latest threat classification were observed during the site visit. However, two species listed as At Risk-Declining in the former threat classification were frequently observed - mānuka (*Leptospermum scoparium*) and matagouri (*Discaria toumatou*).
- [19] The site visit confirmed that all other areas of vegetation mapped from desktop analysis were accurately categorised.
- [20] I was not able to undertake a similarly detailed site visit at Stoney Creek Station. However, during the site visit undertaken by the working group, I was able to visually verify the broad desktop mapping I had undertaken for most of the site.
- [21] I relied on the detailed vegetation community descriptions and mapping of Stoney Creek Station undertaken by e3Scientific for details of species composition in these areas, and for ground-truthed confirmation of my desktop/visual mapping. This information was shared with me by Mr Davis in subsequent working group meetings.
- [22] It is noted that the mapping of vegetation types provided by e3Scientific aligned very closely with my desktop mapping of the three broad vegetation types. Two areas of disagreement were noted during discussions with Mr Davis at the working group, both of which were able to be conclusively resolved using the more detailed site survey data including photographs.
- [23] Based on the above combined ecological information, Mr Davis and I categorised the ecological values into low, medium and high values for vegetation and habitats across the Hokonui Hills. Vegetation Areas A-D were defined and agreed upon by Mr Davis and I, as presented in the Hokonui Hills Vegetation Plan shown in Appendix 7 of the ECO Chapter. These categories matched extremely closely with my mapping of high

value indigenous vegetation, mixed indigenous/exotic vegetation and exotic pasture respectively.

Commentary on Evidence of Glenn Davis

- [24] I consider that the ecological survey and desktop assessment methodology undertaken by e3Scientific and outlined in the evidence of Mr Davis is appropriate to the scale of the property and purpose for which the information was gathered. I consider that it provides an accurate description of the composition and distribution of vegetation and habitats across the area, and of ecological values associated with the different areas. From my experience this reasonably represents what would typically be required in a consenting process.
- [25] I agree that all the vegetation communities at Stoney Creek Station are seral, and that the more advanced successional communities of the 'broadleaf forest' and some of the 'manuka shrublands' are on a trajectory toward mature forests similar in nature to Croydon Bush. I consider it is very likely that podocarps will establish in these areas, even in the ongoing presence of stock grazing. The wide age range of seral vegetation indicates that regeneration of indigenous species and expansion of shrubland into pasture has been ongoing over many decades, even with stock grazing. It is reasonable to assume that this expansion and maturation of seral vegetation will continue in the coming decades.
- [26] Two At Risk-Declining plant species were observed in shrubland during the site survey – *Olearia lineata* and *Olearia fragrantissima*. My understanding from discussions with Mr Davis is that these were present as sparsely scattered individuals within the 105 hectares of 'wharariki/inaka/olearia shrubland'. I note that *Coprosma rubra* and *Olearia odorata* are now also classified as At Risk-Declining, and that mānuka (*Leptospermum scoparium*) and matagouri (*Discaria toumatou*) are no longer classified as At Risk.
- [27] In relation to the proposed permitted maintenance of improved pasture, I agree with Mr Davis that indigenous vegetation clearance should be permitted in all areas mapped as improved pasture and exotic

vegetation, for the reasons he outlines. The site inspection by herpetologist Carey Knox had not been undertaken at the time of the working group meetings; although the survey extent was limited the findings nevertheless provide further support for my view on this rule.

- [28] In relation to the proposed clearance limit of 3,750 m² per 5 years in Area A (as shown in Appendix 7), I reach the same conclusion as Mr Davis that this will ensure the maintenance of overall indigenous biodiversity in Area A. This rule would allow for a maximum clearance of 0.28% of this 270 hectare vegetation area over the 10 year period of the proposed plan. I am confident that the expected ongoing colonisation of grassy areas and successional development of existing indigenous vegetation within the 270 hectares will more than make up for any loss of vegetation area, even if grazing is continued over the entire area. I also consider these activities will have a low level of disturbance that is similar in nature to historical disturbances that have occurred on the property. Regeneration of indigenous vegetation in the cleared areas is also likely to occur even in the presence of grazing, consistent with trends over the property.
- [29] In relation to the proposed clearance limit of 1,250 m² per 5 years in Area C (as shown in Appendix 7), I also reach the same conclusion as Mr Davis that this will ensure the maintenance of overall indigenous biodiversity in Area C. This rule would allow for a maximum clearance of 0.07% of this 366 hectare vegetation area over the 10 year period of the proposed plan. I agree with Mr Davis that this provision will facilitate a significant improvement in biodiversity as this area continues to regenerate over the next decade.
- [30] For the same reason, I also consider that the proposed clearance limits for Areas B and D at Wantwood Station will ensure the maintenance of overall indigenous biodiversity.
- [31] I note that Mr Davis does not make mention of the 120 hectare area of Stoney Creek Station for which there is a formal management agreement in place with DOC. While I am not familiar with the details of this agreement, my understanding is that it provides for a management regime that ensures the ongoing protection of a regionally important

population of the At Risk-Declining *Olearia hectorii*, other important plant species, and lizards. This management agreement is an additional very important component of the ecological management of Hokonui Hills, and should be included when assessing overall biodiversity outcomes from management over the Hokonui Hills.

- [32] Taking the above factors into account, I am of the same opinion as Mr Davis that the suite of provisions proposed by the working group will support the maintenance and improvement of indigenous biodiversity over the life of the proposed plan, while providing certainty for the proposed farm management regime over this time.

Responses to Points Raised in DOC Submissions

Bespoke Rules for the Hokonui Hills Precinct in ECO-R2

- [33] The information contained in the evidence of Mr Davis and my evidence was available to the working group at the time of formulating the proposed rules for this precinct. This includes ground-truthing of both Stoney Creek Station and Wantwood Station, which is essential to the ecological assessments. I consider that this information is sufficiently comprehensive for the purposes it has been used for. I do however note that the findings of the additional lizard survey and the implications of the 120 hectare management area at Stoney Creek Station were not considered during working group meetings. Inclusion of this additional information does not alter my overall conclusions, but gives me greater confidence in them. It is unfortunate that the information available to the working group was not available for submitters until now.
- [34] DOC raised particular concerns around clarity of what Threatened and At-Risk plant species are present in the area and where they are to be found. The evidence of Mr Davis and myself have provided clarity around what species are present, and the broad habitats in which they are found in at Wantwood Station and Stoney Creek Station.
- [35] The evidence of Ms Zammit-Ross also includes a list of eight threatened or uncommon plants identified within the 'land management area' on Stoney Creek Station. This reinforces the ecological importance of this portion of the property for threatened plants.

[36] The field surveys in other areas of the Hokonui Hills did not find any large or dense populations of threatened species. Nevertheless, the mapping of Hokonui Hills vegetation does not map the specific locations of individual threatened plants and it is possible that individuals could be lost through permitted clearance. It is also possible that populations of kōwhai (Not Threatened, but ecologically important in the Hokonui Hills) could be affected by clearance.

[37] In my opinion the possible loss of individuals of threatened plants through permitted vegetation clearance would have a negligible effect on the At Risk-Declining species identified in the field surveys and on kōwhai. This is because of the large areas of habitat available that will remain intact, and the scattered distribution of these species across the landscape.

[38] Despite this, the At Risk plant species that may be present in cleared vegetation are easily identified and could most likely easily be retained in clearance activities. For this reason, I consider that it would be reasonable to add a condition requiring that vegetation clearance avoids threatened woody plants. Such a condition would provide even greater certainty that there are no adverse effects on threatened plants. A suggested list of woody threatened species to be avoided is:

Coprosma rubra (At Risk-Declining)

Coprosma wallii (At Risk-Declining)

Olearia fragrantissima (At Risk-declining)

Olearia hectorii (Threatened-Nationally Endangered)

Olearia lineata (At Risk-Declining)

Olearia odorata (At Risk-Declining)

Pseudopanax ferox (At Risk-Naturally Uncommon)

[39] DOC also raised concerns around the need for detailed lizard surveys to ensure protection of biodiversity, noting that indigenous skink species can be present in a range of habitats including wetlands, grasslands, shrubland, rocky shrubland, herbfield, and tussockland.

[40] I agree that it is possible that lizards will be present in areas of permitted vegetation clearance, and that a lizard survey is the only way to establish

their presence. Permitted vegetation clearance could result in incidental loss of individual lizards.

- [41] I agree with Ms Zammit-Ross' evidence in paragraph 26 that emphasises the importance of keeping rocky areas intact (and undisturbed) to provide habitat for Southland green skink, cryptic skink and korero gecko, if still present in the Hokonui Hills. Rocky habitats are not only very important habitats for lizards, but are very restricted in extent. It was for this reason that I mapped all rocky habitat as 'high value indigenous vegetation' (see paragraph 15 above).
- [42] Given this, I can see merit in requiring areas of rocky habitat to be excluded from permitted vegetation clearance. This would enable lizard surveys to inform decisions if vegetation clearance was proposed in these important habitats, ensuring maintenance of key lizard values. This would complement the lizard habitat protected within the 'land management area'.
- [43] If these high value areas of habitat were excluded, I consider that it is reasonable to assume that the potential loss of lizard habitat resulting from the permitted vegetation clearance limits would have a negligible effect on lizard populations within those remaining vegetation and habitat types that occupy a large area and are not restricted in occurrence. This is because of the very small proposed permitted clearance limits in relation to the areas of vegetation remaining undisturbed. While the permitted vegetation clearance could result in incidental loss of individual lizards, for the above reasons I do not consider this would adversely affect populations of lizards.
- [44] The outcomes of requiring lizard survey and management in these areas prior to any clearance would most likely achieve marginal biodiversity gains, but at considerable cost. If lizard survey and management was also proposed before undertaking maintenance of improved pasture or exotic vegetation, the costs would be very large indeed. My understanding is that an economic analysis of lizard survey and management as part of permitted vegetation clearance was not included in the scope of the economic analysis commissioned by council. Even

the most straightforward lizard survey and management plan can be expected to cost many thousands of dollars.

[45] Regarding significance assessments of vegetation, I remain of the opinion that SIVAs in areas C and D (refer PDP Appendix 7) meet the SNA criteria in NPS-IB and SIVA criteria in the SRPS. While I have not undertaken a formal significance assessment for the many discrete vegetation patches that comprise Areas B and D, my observations are that some areas of vegetation would meet these criteria and other areas would not.

[46] Regardless of how these areas are categorised with respect to significance, I remain satisfied that the proposed management regime for the Hokonui Hills will ensure the overall protection of the ecological values that give importance to Areas A-D.

Mapping of Mataura River Black-Billed Gull Habitat

[47] I agree with Mr McKinlay's evidence that the Mataura River and its margins within the boundaries of Gore District contain important habitat for the endangered black-billed gull. It is also possible that adjoining farm paddocks provide habitat for this species at times, especially after ponding of rain or cultivation.

[48] The Wildlands indigenous vegetation mapping includes small, mapped pockets along the Mataura River. However, because wetland and riparian/riverbed habitats were beyond the scope of this assessment, the wider Mataura River habitat that does not contain indigenous vegetation was not mapped.

[49] While Mr McKinlay's assessment provides further valuable information, it is not clear whether the entire extent of the Mataura River in Gore District provides high value habitat.

[50] I consider that mapping the Mataura River habitat as SIVA/IVA would be inappropriate, given that the rest of the mapping considered indigenous vegetation only. If the Mataura River habitat was included in the plan, I would suggest that it is mapped separately, for example as an indicative important fauna habitat area.

- [51] Our memo noted that habitats for highly mobile fauna species would need to be assessed further, and mapped once this assessment is completed. This remains my preferred approach, as it would ensure a consistency across the district.

Clearance of Vegetation Less Than 15 Years Old - ECO-R1(1)(n)

- [52] The addition of the proposed permitted clearance of regrowth indigenous vegetation after previous clearance that is less than 15 years old was suggested primarily to provide clarity and certainty for landowners and Council around historical use rights. As noted in the Wildlands memo, this would primarily be relevant for any areas which were cleared for purposes other than pastoral farming (as the permitted maintenance of improved pasture would cover this in most pastoral farming situations). It is extremely unlikely that any areas of such young vegetation are mapped as SIVA/IVA.
- [53] I note that the 'historical use right' purpose is not presently conveyed in this rule. Because of this omission, I agree that the rule could provide a loophole by permitting potentially extensive clearance of regenerating indigenous vegetation anywhere. Based on my observations, in the Gore District this type of vegetation is largely restricted to steeper and less fertile hill country.
- [54] However, I accept that monitoring of such clearance would be challenging, and that most of the cases where this rule is applicable would already be covered by permitted maintenance of improved pasture.
- [55] For these reasons, I consider that it would be appropriate to remove this rule. The other proposed permitted clearance limits and clearance of less than 50m² would adequately cater for those situations that may arise outside of maintenance of improved pasture, and are much easier to monitor.
- [56] This would also resolve the concerns expressed in the evidence of Ms Zammit-Ross (i.e. that clearance of indigenous vegetation younger than 15 years old will result in 'slowing down' successional processes, and that removing indigenous vegetation younger than 15 years old can lead

to increased habitat fragmentation through the removal of habitat corridors).

Clearance of Less Than 50m² Per 5-Year Period Involving Non-Forest Vegetation - ECO-R1(1)(n)

- [57] The intention in proposing this rule was to permit clearance of very small areas of indigenous vegetation that may incidentally emerge during routine farming, in situations where a consent would be out of proportion to the impact. An example given in the Wildlands memo was where a slightly wider band of clearance than otherwise permitted was required to undertake a specific permitted maintenance or upgrade task.
- [58] I agree with DOC that adoption of the 50m² area per five years clearance limit, as for any clearance threshold, still has the potential to result in a net loss of indigenous vegetation in Gore District. However, I consider that this is most unlikely because the many early successional communities represented by SIVA/IVA will increase over the life of the plan as these areas become more mature. In my opinion, in combination with the other proposed rules, this rule will support the maintenance and improvement of indigenous biodiversity over the life of the proposed plan, while still enabling landowners to undertake routine activities without requiring a consent.

Vegetation Clearance Widths

- [59] Proposed permitted vegetation clearance widths for maintenance of existing fences would allow for clearance that is no greater than the existing clearance width. I consider that this rule would be very unlikely to adversely affect biodiversity in the Gore District (outside of the Hokonui Hills). It is my observation that where fences adjoin indigenous vegetation, they almost always have improved pasture on the other side of the fence, such that clearance of indigenous vegetation required to maintain the fence will be very limited. Also, any clearance of indigenous vegetation required would be of regrowth vegetation, and not previously uncleared vegetation.
- [60] With regards to dams, I consider that the proposed rule restricting clearance to the existing width would not adversely affect biodiversity.

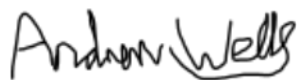
Any clearance of indigenous vegetation required would be of regrowth vegetation, and not previously uncleared vegetation. Any additional areas of clearance required for maintenance purposes could be attained through the other proposed rules, including the clearance of 50m² .

Summary

- [61] Wildlands produced updated desktop mapping of terrestrial indigenous vegetation within Gore District. This mapping sought to delineate areas of likely non-significant indigenous terrestrial vegetation (termed 'indigenous vegetation areas', or IVA), and areas of likely significant indigenous terrestrial vegetation (termed 'significant indigenous vegetation areas,' or SIVA).
- [62] I was commissioned by Council to assess vegetation and habitats in the Hokonui Hills (Stoney Creek Station and Wantwood Station), to inform discussions at the working group meetings for the Hokonui Hills Precinct. I consider that the available information allowed for an accurate description of the composition and distribution of vegetation and habitats across the area, and of ecological values associated with the different areas. I am of the same opinion as Mr Davis that the suite of provisions proposed by the working group will support the maintenance and improvement of indigenous biodiversity over the life of the proposed plan, while providing certainty for the proposed farm management regime over this time.
- [63] In relation to the Hokonui Hills Precinct, it is my opinion that the possible loss of individuals of threatened plants would have a negligible effect on these species, because of the large areas of habitat available that will remain intact. Nevertheless, adding a condition requiring that vegetation clearance avoids threatened woody plants would provide even greater certainty that there are no adverse effects on these species.
- [64] In relation to lizards in the Hokonui Hills Precinct, I consider that areas of rocky habitat should be excluded from permitted vegetation clearance due to their high value for lizards and restricted extent across the Hokonui Hills. If these high value areas of habitat were excluded, I consider that it is reasonable to assume that the potential loss of lizard

habitat resulting from the permitted vegetation clearance limits would have a negligible effect on lizard populations within those remaining vegetation and habitat types that occupy a large area and are not restricted in occurrence.

- [65] In relation to significance assessments within the Hokonui Hills Precinct, regardless of how these areas are categorised I am satisfied that the proposed management regime for the Hokonui Hills will ensure the overall protection of the ecological values that give importance to Areas A-D.
- [66] I consider that mapping the Mataura River avifauna habitat as SIVA/IVA would be inappropriate, given that the rest of the mapping considered indigenous vegetation only. If the Mataura River habitat was included in the plan, I would suggest that it is mapped separately.
- [67] Based on the further evidence of submitters, I consider that it would be appropriate to remove the rule permitting clearance of vegetation less than 15 years old. The other proposed permitted clearance limits would adequately cater for those situations that may arise outside of maintenance of improved pasture, and are much easier to monitor.
- [68] I consider that the proposed permitted clearance of less than 50m² over five years is most unlikely to adversely affect biodiversity, because the many early successional communities represented by SIVA/IVA will increase over the life of the plan as these areas become more mature. In my opinion this rule will support the maintenance and improvement of indigenous biodiversity over the life of the proposed plan, while enabling landowners to undertake routine activities.



Andrew Wells

20 February 2025