

**BEFORE INDEPENDENT HEARING COMMISSIONERS APPOINTED BY THE
TIMARU DISTRICT COUNCIL**

IN THE MATTER OF

The Resource Management Act 1991 (**RMA** or
the Act)

AND

IN THE MATTER OF

Hearing of Submissions and Further
Submissions on the Proposed Timaru District
Plan (**PTDP** or **the Proposed Plan**)

AND

IN THE MATTER OF

Submissions and Further Submissions on the
Proposed Timaru District Plan by **Port Blakely
Limited**

**EVIDENCE OF ZACHARY KIM ROBINSON
ON BEHALF OF PORT BLAKELY LIMITED REGARDING HEARING (D) NATURAL
ENVIRONMENT**

Dated: 25 October 2024

Presented for filing by:
Chris Fowler / Shona Walter
PO Box 18, Christchurch
T 021 311 784 / 022 400 66 76
chris.fowler@saunders.co.nz / shona.walter@saunders.co.nz

INTRODUCTION

- 1 My name is Zachary Kim Robinson.
- 2 I have a qualification in Arboriculture, from City & Guilds (NPTC) and I have a Diploma in Business from ARA Institute of Canterbury.
- 3 I have extensive experience in environmental management and delivery across a wide breadth of projects including monitoring and management of New Zealand's native long-tailed bat (**Pekapeka**) within the South Canterbury Region. I am a voluntary member of the South Canterbury Long Tailed Bat Working Group (**LTBWG**) and have undertaken substantial monitoring programs working alongside the Department of Conservation (**DoC**). I also developed the South Canterbury Pekapeka (Bat) Strategy in consultation with relevant stakeholders.
- 4 I worked for Port Blakely for 4 years as the National Health, Safety and Environmental Manager between 2018 and 2022. I subsequently established Zolve Environmental Ltd.
- 5 My role in relation to the Timaru Proposed District Plan (**Proposed Plan**) is as an expert witness to Port Blakely Limited (**Port Blakely**) regarding proposed rules to manage and project the long-tailed bat.
- 6 Although this is not an Environment Court proceeding, I have read the Environment Court's Code of Conduct and agree to comply with it. My qualifications as an expert are set out above. The matters addressed in my evidence are within my area of expertise, however where I make statements on issues that are not in my area of expertise, I will state whose evidence I have relied upon. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed in my evidence.

SCOPE OF EVIDENCE

- 7 In my evidence I address the following topics:
 - (a) My work and Port Blakely's work to improve management of long-tailed bat habitat within Port Blakely's forests;
 - (b) Expert advice about known long-tailed bad behaviour and bat habitat;

- (c) Requirements in the Proposed Plan for tree clearance in the Long-Tailed Bat Protection Area; and
- (d) The merits of the Proposed Plan requirements in light of such advice and known behaviour of long-tailed bats.

SUMMARY OF MY EVIDENCE

- 8 South Canterbury Pekapeka is one of the most fragile colonies of Pekapeka remaining in New Zealand. Port Blakely has known Pekapeka roost habitat within two of their forests. Port Blakely has been engaged the South Canterbury Long Tailed Bat Working Group since 2010. This group is made up of many stakeholders, including DoC and Timaru District Council. This group carries out a range of functions to harmonise Pekapeka protection measures throughout South Canterbury.
- 9 The DoC Bat Roost Protocols have been adopted across New Zealand and are a practical guide on how to safely remove trees in bat roost areas in a way which minimises risk to Pekapeka. Port Blakely has integrated these practices into their Pekapeka management plans, along with other measures which protect Pekapeka habitat.
- 10 The use of these measures and the DoC Protocols have been successful in maintaining Pekapeka populations and identifying new habitat. In my opinion the Proposed Plan rules should be amended to align with expert advice about known long-tailed bad behaviour and bat habitat.

MANAGEMENT OF LONG-TAILED BAT HABITAT WITHIN PORT BLAKELY'S FORESTS

- 11 Port Blakely manage two known bat colonies, Raincliff Forest (83 hectares) and Māori Gully (80 hectares) and has invested heavily in these areas for the purpose of Pekapeka protection and enhancement. Both colonies have permanent pest control and monitoring programs managed and funded by Port Blakely and annual Pekapeka population monitoring, a new initiative for the species, which Port Blakely have been supporting for 5 years.



Figure 1 Raincliff Forest showing known Pekapeka Roost trees and Predator Control

- 12 The image above shows an overview of the Raincliff Forest in relation to the Pekapeka protection and enhancement project. The grey/ red symbols show the location of pest control traps targeting rats, mice and mustelids. The small red dots show the location of all known Pekapeka roost trees.

The Threatened Status of Pekapeka in New Zealand

- 13 The South Canterbury Pekapeka is one of the most fragile colonies of Pekapeka remaining in New Zealand with estimates of approximately 300 breeding females remaining. In the early 2000s there was doubt over whether this colony would survive. While the program appears to not have been viewed as high priority on a national level, the recovery of Pekapeka has continued to succeed. This is due to the support of local communities and businesses alongside passionate individuals which has seen it become one of the largest species protection programs in South Canterbury.

The Long Tailed Bat Working Group

- 14 Representing Port Blakely, I have been a stakeholder and leader in the LTBWG since approximately 2015, when Pekapeka were first discovered in Raincliff forest. The LTBWG is an informal group consisting of representatives of key stakeholder groups.
- 15 Since then, the objectives of the LTBWG developed into population, habitat protection, monitoring, pest control, education and awareness initiatives and expanded well outside the Port Blakely estate. The South Canterbury Pekapeka population is critically endangered and the project to date has been recognised as a 'blue-print' of how collaboration between the public and private sector can achieve biodiversity outcomes as well as raising the awareness of Pekapeka within our communities.
- 16 The South Canterbury Pekapeka program has been built on partnerships between the public sector, private sector, and individual landowners. Over the last 7 years the program has developed extensively, led by the LTBWG.
- 17 Below are details about the different members of the LTBWG and their role. These can be found in the South Canterbury Pekapeka Strategy (**attached at Appendix A**).¹

Members	Role/ Involvement
Arowhenua Runanga	Provide advice and direction from a mana whenua perspective. Pekapeka are considered a significant Taonga species to this Runanga.
Department of Conservation	Provide direction and support both financially and in-kind to the Pekapeka Program, including annual mark and re-capture monitoring, roost counts and data analysis.
Environment Canterbury	Financially support the Kakahu Habitat Pest Control Program, and support education and advocacy.

¹ South Canterbury Pekapeka Strategy (Final Draft), 30 June 2023, pg.5.

Forest & Bird	Provide expertise and guidance on the program. Involved directly with the Talbot Forest Working Group programs and historically involved in Pekapeka studies in the region.
High Country Contracting	Pest control experts who provide advice and services to a number of pest control programs within Pekapeka habitats.
LINZ	Financially support protection and enhancement work within the Opihi and Te Ngawai habitats.
Port Blakely	A large forest owner with key Pekapeka colonies within their Geraldine and Raincliff forests. Port Blakely have been a significant contributor to the Pekapeka Program for a number of years including financially and in-kind pest control, monitoring and habitat management.
Timaru District Council	Provided regulatory support through proposed District Plan rules for Pekapeka habitats. Also managing Significant Natural Areas (SNA) through the district and operating an educational Pekapeka Program through the local museum.

18 It is noted that the DoC is a stakeholder, whose role is, amongst other things, to provide direction. Timaru District Council (the **Council**) is also a stakeholder, whose role is to provide regulatory support. One of the main objectives of the South Canterbury Pekapeka Strategy is the alignment of all Pekapeka work within the South Canterbury Region.²

19 The South Canterbury Pekapeka program has been focused in three areas:

- (a) Habitat identification and protection
- (b) Behaviours and monitoring
- (c) Community engagement and awareness

20 Since the early 2010s when Pekapeka were discovered to be roosting in the Raincliff Forest, Port Blakely have been an important stakeholder in the South Canterbury Pekapeka Program and are a member of the LTBWG. Port Blakely

² South Canterbury Pekapeka Strategy (Final Draft), 30 June 2023, pg.3.

has provided financial contributions, purchasing of equipment (Bat Monitors, Pest Control) in-kind resources, technical expertise and facilitation of public events and awareness programs to support development of a species protection program for Pekapeka in South Canterbury.

Department of Conservation Bat Roost Protocols

- 21 DoC have developed “Protocols for minimising the risk of felling bat roost trees” (**DoC Protocols**). My evidence was originally prepared based on Version 2 (**V.2**) of the DoC Protocol, released in October 2021 (**attached at Appendix B**). However, DoC released Version 4 (**V.4**) in October 2024 (**attached at Appendix C**). My evidence first discusses V.2, then discusses V.4.
- 22 The DoC Protocols have been adopted across New Zealand, including in South Canterbury.
- 23 The purpose of these protocols is:
- To outline why protection of roosts is important for the persistence of New Zealand bats and why removal of known and potential roosts should be avoided.
 - Identify where roost removal cannot be avoided, to set out the minimum requirements and protocols for removing trees in areas where bats are present, to minimise the risk of killing bats.
- 24 The table below is an excerpt from the V.2 DoC Protocol, describing the steps to take when deciding whether to remove a tree in a bat area and in particular, whether the tree/vegetation in questions is a potential roost for bats.

Step 2. Does the vegetation proposed to be removed have potential bat roost characteristics?	Response	Who can make this assessment?	When?
a) Is the tree ≥15 cm DBH (Diameter at Breast Height)? ⁷	<u>If yes</u> , further assessment is required (2b). <u>If no</u> , the vegetation can be removed at any time ¹⁰ .	Anyone who can measure a tree DBH.	Any time
b) On visual inspection, does the tree (dead or alive) have features that indicate roost potential? These features include: <ul style="list-style-type: none"> • hollows • cavities • knot holes • cracks • flaking, peeling, and decorticating bark • epiphytes • broken or dead branches or trunk • cavities/hollows/shelter formed by double leaders This may require climbing the tree if you can't see all the tree from the ground.	<u>If yes go to step 3</u> <u>If unsure</u> , further assessment is required. This may include climbing the tree. <u>If no potential roost features are present</u> , the vegetation can be removed at any time ¹¹ , but if upon felling you find a bat follow section 5.	Anyone that can identify these features. ¹² If further assessment required, then use an approved person at Competency Level 3.3.	Visual inspections can occur at any time. If there are NO potential roost features, felling can occur at any time of year.

- 25 When determining if the tree has particular features which indicate roost potential, the DoC Protocol states that a person with Competency Level 3.3 can carry out this step.
- 26 To reach Competency Level 3.3, a person must be able to identify 'In at least two different forest/habitat types, including the forest/habitat type where trees are going to be assessed: evaluate 10+ potential roost features in trees (e.g., cavities, peeling bark, epiphytes).'³
- 27 V.4 DoC Protocol amends protocols in V.2 relating to identifying bat roost habitat, as follows:
- (a) Regarding Step 1 (b) of the Bat Protocols- '*Are bats present in the project areas?*' V.4 has been updated to 'If surveys are required to support the assessment, then these will need to be designed by approved person accredited with Competency 3.1. to determine presence around trees due to be felled'.⁴ This removes the requirement for an 'experienced bat ecologist' as per V.2. Note that competency 3.1 is detailed as 'Assessing roost tree use using Automatic Bat Monitors - Demonstrate correct timing, placement, and interpretation of data for 10+ times according to DOC's Tree Felling Protocols.'⁵
 - (b) Regarding Step 2 (b) of the Bat Protocols- '*Does the vegetation proposed to be removed have potential bat roost characteristics?*' V.4 has removed the statement 'anyone that can identify these features' and maintained an approved person with a competency level of 3.3.⁶ V.4 also includes a reference to artificial roost boxes and includes an update to when the visual inspection can take place adding an additional 'within 6 months of final felling dates. This accounts for any changes in trees that may occur over time.'⁷
 - (c) V.4 has also made amendments to the '*Bat Roost protocols and the RMA*' section, clarifying how the protocols are to be implemented and

³ Bat Roost Protocols V.2 2021, Department of Conservation, p. 3.

⁴ Bat Roost Protocols V.4 2024, Department of Conservation, p.6.

⁵ *Ibid.*, p.3.

⁶ *Ibid.*, p.7.

⁷ *Ibid.*, p.7.

who can give and gather advice, referring back to the DoC competency levels.⁸

(d) V.4 also provides more direction on the use of ABM's for survey work, and roost watches.⁹

28 My interpretation of V.4 is that it supports Port Blakely's submission in relation to the Proposed Timaru District Plan rules. In particular, V.4 has further reduced the requirement for an ecological assessment for identifying potential bat roost trees. V.4 also removes the need for an experienced ecologist to assess if bats are present in the project area (step one) and replaces the need for an ecological assessment, with an assessment completed by a person holding 3.3 competencies.¹⁰ See for example the decision making tool **below**, where I have highlighted in yellow the key aspects.

Step 2. Does the vegetation proposed to be removed have potential bat roost characteristics?	Response	Who can make this assessment?	When?
a) Is the tree ≥15 cm DBH (Diameter at Breast Height)?	<p>If <u>yes</u>, further assessment is required (2b). If <u>no</u>, the vegetation can be removed at any time.</p> <p>There may be roosts that have smaller DBH. If any vegetation is suspected to have a bat roost present, removal shall be halted immediately, and protocols reviewed.</p>	Anyone who can measure a tree DBH.	Any time
<p>b) On visual inspection, does the tree (dead or alive) have features that indicate roost potential (Potential Roost Features/PRFs)? These features include:</p> <ul style="list-style-type: none"> • hollows • cavities • knot holes • cracks • flaking, peeling, and decortivating bark • epiphytes • broken or dead branches or trunk • cavities/hollows/shelter formed by double leaders 	<p>If <u>yes go to step 3</u></p> <p>If <u>unsure</u> i.e. cannot assess due to foliage or limited access, further assessment is required. This may include climbing inspection of the tree.</p> <p>If <u>no potential roost features are present</u>, the vegetation can be removed at any time⁸.</p>	Approved person accredited with Competency 3.3.	<p>Visual inspections can occur at any time of the year, but within 6 months of final felling dates. This accounts for any changes in trees that may occur over time.</p> <p>If there are NO potential roost features, felling can occur at any time of year.</p>

⁷ This diameter at breast height is based on dimensions of roosts used by south Hamilton long-tailed bats that were identified by Dekrout (2009, Unpublished PhD thesis, University of Auckland) - the smallest roosts were 15.5 cm DBH; but note that in South Canterbury Sedgely and O'Donnell (2004, New Zealand Journal of Ecology 28(1): 1-18) found that 25% of long-tailed bat roosts were smaller than 18.8 cm DBH.
⁸All surveys to assess whether trees are potential roosts shall take place within 6 months of final felling dates. If felling does not take place within this time, then assessments must be repeated. This is intended to account for any changes in trees which may occur over time.

• Artificial roost boxes	but if upon felling you find a bat follow section 5.		
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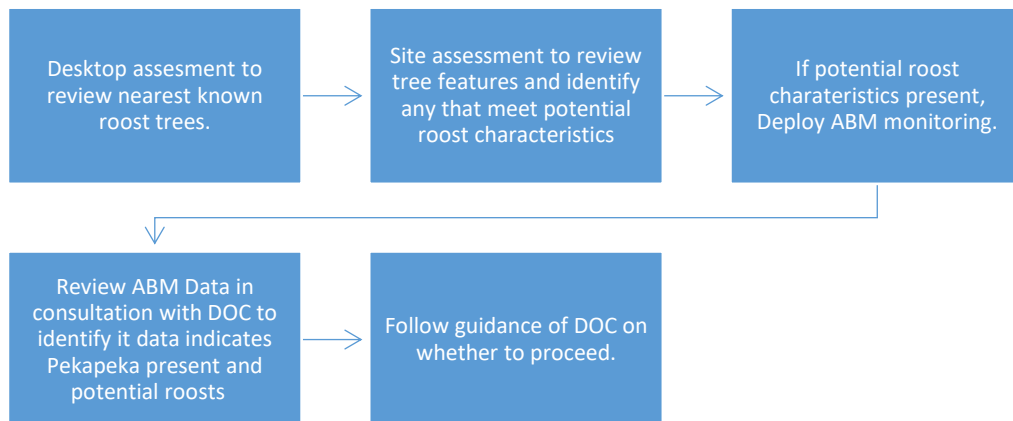
Port Blakely's management plan for long tailed bats

⁸ *Ibid.*, p.1.

⁹ *Ibid.*, p.1.

¹⁰ *Ibid.*, p.7.

29 Port Blakely works very closely with DoC experts for assessing and monitoring trees within the Pekapeka Habitat Zone pre-harvest. In summary this process includes:



30 This process has proven very successful to date in South Canterbury without the requirement of a suitably qualified ecologist to identify potential habitat for Pekapeka.

31 I have also implemented and developed the following practices used by Port Blakely prior to harvest. These have been endorsed and supported by DoC.

32 Pre-harvest Monitoring Procedures (**attached at Appendix D**), which were adopted following the publication of the DoC Bat Roost Protocols. These procedures include engaging with landowner's pre-harvest to undertake Pekapeka monitoring. This step sometimes results in finding new roost trees and habitat.

33 Habitat prospecting- which requires actively looking and monitoring for new colonies. To date new colonies were identified in Māori Gully and potentially a new colony in Geraldine Forest in the 2022/23 season.

34 Pest Control - trialling a range of pest control options tailored to Pekapeka protection during maternal roosting periods. This research is shared with the wider South Canterbury Pekapeka Program for implementation in other colonies.

- 35 Stakeholder engagement and awareness- work in the community on raising awareness of the species and habitat protection, hosting a number of events and supporting other stakeholders on monitoring and protection options.
- 36 Change to harvest methodologies- undertaking harvesting programs in known Pekapeka habitat to protect potential roost trees, including undertaking night roost watches, using a range of thermal and eco-frequency monitoring equipment. This operation was conducted with support from DoC.
- 37 Port Blakely's engagement in the South Canterbury Pekapeka Program is not driven by regulatory requirements, most of what they undertake is over and above regulations. Their involvement in this program is driven by Port Blakely's interest in ensuring the management of their forests is having a positive effect on the environment. This is only one example of a species protection program they are involved in. Port Blakely are also involved in a New Zealand falcon protection programme in Otago and a Kokako protection program in the Bay of Plenty and have management plans for a number of other species located within their forests.
- 38 Port Blakely have developed the following internal policies and reporting regarding managing Pekapeka populations within their forests:
- Pekapeka Management Plan
 - Raincliff High Conservation Value Forest Management Plan
 - Māori Gully High Conservation Value Forest Management Plan
 - Annual Monitoring Report
 - Raincliff & Māori Gully Annual Stakeholders Report
 - Pre-harvest Monitoring Guidance
- 39 Port Blakely carried out harvesting operations in the Raincliff Forest in 2022, which required Pekapeka assessment and monitoring including consultation with DoC and followed Port Blakely's Pre-harvest procedures. **Appendix D** summarises the automatic bat monitoring (**ABM**) data collected during this operation.

**KEY PROVISION IN THE PROPOSED PLAN REGARDING BAT PROTECTION
RULE/OVERLAY**

ECO-R4 Clearance of trees in the Long-Tailed Bat Protection Area

Long-Tailed Bat Protection Area Overlay

Activity Status: Permitted where:

PER-1

The trees being cleared:

1. *were planted for timber production (plantation forest and woodlots); or*
2. *are within a domestic garden; or*
3. *are causing an imminent danger to human life, structures, or utilities and the clearance is undertaken in accordance with advice from a suitably qualified arborist; or*

PER-2

The tree is

1. *a native tree with a trunk circumference of less than 31.5cm, when measured at 1.5m above ground level; or*
2. *an exotic tree, excluding willow, with a trunk circumference of less than 70cm, when measured at 1.5m above ground level greater; or*
3. *any willow tree with a trunk circumference of less than 120cm, when measured at 1.5m above ground level.*

Activity Status where compliance not achieved: Restricted discretionary

Matters of discretion are restricted to:

1. *whether, upon specialist assessment by a suitably qualified ecologist, the tree/s proposed to be removed is habitat for long-tailed bats; and*
2. *the extent to which the removal of tree/s would impact on the ability of the long-tailed bat protection area to provide for the habitat needs of the bats; and*
3. *the extent to which the long-tailed bat protection area has been previously modified by the removal of bat habitat;*
4. *the reasons for removal of the tree and any alternatives considered; and*
5. *any measures to avoid or mitigate the adverse effects.*

40 I oppose the Proposed Plan rule and overlay as it is currently proposed. My reason for opposition is because I support the protection of long-tailed bat habitat; however, I feel the requirements of a suitably qualified ecologist is extensive at the assessment phase and does not align with V.2 or V.4 of the DoC Protocols.

Proposed Plan approach

DoC Protocols

- 41 All of the measures in ECO-R4 PER-2 relate to tree circumference. However, according to the DoC Protocols, tree circumference is the starting point for identifying potential habitat, other features of the tree can be equally important.¹¹
- 42 In relation to the first matter of discretion listed above, the requirement to have a specialist assessment by a suitably qualified ecologist to assess if the tree has potential roost characteristics, also does not align with the DoC Protocols. The DoC Protocols state firstly, anyone who can identify the relevant features can carry out this step. Then if further assessment is required an approved person with level 3.3 competency can undertake this assessment.
- 43 Port Blakely have developed a comprehensive Long-tailed Bat Management Plan with consultation and input from DoC bat experts, **attached at Appendix E**. This plan details requirements for pre-harvest assessments, management of known colonies (Raincliff forest and Māori Gully, Geraldine Forest) as well as on-going monitoring and prospecting for new habitats, roosts and colonies.
- 44 Implementing the DoC Protocols and Port Blakely's Management Plan have provided successful outcomes in supporting long-tailed bat populations in Port Blakely's forests. This is proven through the annual population monitoring undertaken by DoC experts at both Raincliff and Māori Gully colonies since 2019. To date, the data shows the population is stable with no significant changes through the years. We have also undertaken a significant amount of pre-harvest monitoring, using the ABM and approach contained in the DoC Protocols, which has been supported and reviewed by DoC experts.

Cost of the Proposed Plan approach

The need for an ecologist at the early stage

- 45 I consider the requirement for a suitably qualified ecologist in Rule ECO-R4 of the Proposed Plan is unnecessary and will result in unintended consequences where tree removal will not be notified to minimise costs. I agree there is a potential need for a suitably qualified ecologist following the identification of

¹¹ Roost Protocols V.2 2021, Department of Conservation, pg. 2.

potential roost trees through visual inspection and confirmation using ABM Monitors. This is better aligned to the DoC Protocols.

Unintended consequences

- 46 An unintended consequence of the requirement to engage an ecologist during the earlier stages, is that potential roost trees won't be reported prior to removal and public engagement and awareness will reduce.

Alternative approach that achieves an appropriate level of bat protection, without excessive cost associated with the PDP rule

- 47 I recommend amending the Restricted discretionary status to the following. My recommendations are shown with red text:

Activity Status where compliance not achieved: Restricted discretionary
Matters of discretion are restricted to:

1. whether, upon *specialist assessment by a suitably competent person as stated in the Department of Conservation Bat Roost Protocols V.4 2024*, the tree/s proposed to be removed is potential habitat for long-tailed bats; and
2. *If the tree/s is potential habitat for long-tailed bats the extent to which a suitably qualified ecologist considers* the removal of tree/s would impact on the ability of the long-tailed bat protection area to provide for the habitat needs of the bats; and
3. the extent to which the long-tailed bat protection area has been previously modified by the removal of bat habitat;
4. the reasons for removal of the tree and any alternatives considered; and
5. any measures to avoid or mitigate the adverse [effects](#).

SECTION 42 REPORT

- 48 The Officer Report recommends the use of automated bat monitors, as suggested in Port Blakely's submission, and to amend the need for an assessment for an ecologist, to an experience expert. A range of reasons are given for their recommendation, some of which relate to my area of expertise.

- 49 The approach I have adopted in this statement of evidence is to identify those parts of the s42A Report where I agree or disagree and explain my reasons.

- 50 At paragraph 7.10.14, the Officer Report states:

With respect to the rule framework, I am not clear what Port Blakely [94.8] is referring to with respect to a specialist assessment being required to be undertaken during certain months. This wording does not appear in ECO-R4. As the matters of discretion outline what

things the Council may consider in a resource consent process, I agree with submitters that it is appropriate to extend what can be considered to include using an Automatic Bat Monitor. This still allows for the Council to request an ecological assessment if it considers one is warranted in the circumstances, but does not preclude the use of monitor instead. I am also broadly comfortable with the matters of discretion being amended to allow for input from any person who is appropriately qualified and experienced (such as someone deemed to be competent by DOC), on the basis that it provides a wider ambit for discretion. I do not consider that this should be limited to someone deemed as such by DOC, as I consider the expert and for the Council to confirm this (which may or may not require input from DOC).

51 I do agree with this as it aligns to the DoC Protocols.

52 At paragraph 7.10.19 the Officer Report states:

I recommend that ECO-P4 is amended as follows:

Protect long-tailed bats by:

1. Identifying important habitat for long-tailed bats as a Long-Tailed Bat Habitat Protection Area overlay on the Planning Maps; and

2. maintaining the habitat for long-tailed bats within this overlay.

53 I agree, as the suggested amendment aligns with the most current information of long-tailed bat habitat.

54 At paragraph 7.10.20 the Officer Report states:

I recommend that ECO-R4 is amended as follows:

ECO-R4	Clearance of trees in the Long-Tailed Bat Habitat Protection Area	
Long-tailed Bat Habitat Protection Area Overlay	Activity Status: Permitted Where:	Activity status where compliance not

	<p>PER-1 <i>The trees being cleared:</i> 1. <i>were planted for timber production (plantation forest and woodlots); or</i> 2. <i>are within a domestic garden; or</i> 3. <i>are causing an imminent danger to human life, structures, or utilities and the clearance is undertaken in accordance with advice from a suitably qualified arborist; or</i></p> <p>PER-2 <i>The tree is:</i> 1. <i>a native tree with a trunk circumference of less than 31.5cm, when measured at 1.5m above ground level; or</i> 1. <i>an exotic tree, excluding willow, with a trunk circumference of less than 70cm, when measured at 1.5m above ground level greater; or</i> 2. <i>any willow tree with a trunk circumference of less than 120cm, when measured at 1.5m above ground level.</i></p>	<p>achieved: Restricted discretionary Matters of discretion are restricted to:</p> <p>1. <i>whether, upon specialist assessment by a suitably qualified and experienced expert, ecologist or demonstrated through use of an automatic bat monitor, the tree/s proposed to be removed is habitat for long-tailed bats; and</i></p> <p>2. <i>the extent to which the removal of tree/s would impact on the ability of the long-tailed bat habitat protection area to provide for the habitat needs of the bats; and</i></p> <p>3. <i>the extent to which the long-tailed bat habitat protection area has been previously modified by the removal of bat habitat;</i></p> <p>4. <i>the reasons for removal of the tree and any alternatives considered; and</i></p> <p>5. <i>any measures to avoid or mitigate the adverse effects.</i></p>
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55 I do agree with the above amendment to ECO-R4, as it aligns to the DoC Protocols.

CONCLUSION

56 I agree there is a need for a suitably qualified ecologist or Pekapeka specialist deemed competent by DoC when managing Pekapeka roost trees, habitat and colonies. However, I consider the rules in the Proposed Plan have overlooked a vital step contained in the DoC Protocols about using Level 3.3 competent people to assess potential roost trees. This step in the DoC Protocols does not require a qualified ecologist. The cost to include an ecologist prematurely to undertake assessments of potential roost trees will (in my opinion) deter the public from notifying their intentions to remove trees and result in unintended consequences. The South Canterbury Long-tailed Bat Working Group have invested significantly in suitable equipment (ABM's), upskilling of stakeholders and landowner engagement. In addition, the local DoC staff provide these assessments at no cost, which has resulted in raising the awareness and education of the general public regarding the South Canterbury Pekapeka population.

57 To date the South Canterbury Pekapeka program has been successful in assessing potential roost trees, providing guidance to landowners and habitat management for Pekapeka without the need for suitably qualified ecologists to assess potential roost trees.

58 Another measure the Proposed Plan could implement to improve the survival of long-tailed bat populations, is through predator control. Predator control is the most effective way to support and enhance the Pekapeka population and habitat.

59 Thank you for the opportunity to present my evidence.

Zac Robinson
25 October 2024