

Our Ref: 8026d

14 September 2026

Ben Bond (EPA Team Leader, Fast-track Applications)
Environmental Protection Authority
By email: projects@fasttrack.govt.nz

Dear Ben

FTAA-2607-1264 SIMPLICITY LIVING – TE PŪTAHI LADIES MILE: PROPOSED LIZARD MANAGEMENT

INTRODUCTION

Simplicity Living Ltd has submitted a substantive application under the Fast Track Approvals Act (2024) for the 'Te Pūtahi Ladies Mile' urban development at 12 Lower Shotover Road, Queenstown. The construction of a water pipeline is also included in the planned development, close to Old School Road, Twin Rivers Trail, and adjacent private properties along the true left of the Shotover River. The pipeline footprint is proposed to go through a section of the Department of Conservation (DOC) 'Marginal Strip – Kawarau River' protected area (hereafter referred to as the Kawarau River marginal strip) close to the Shotover River.

The Environmental Protection Authority (EPA) have issued Simplicity Living Ltd with a Request for Further Information (RFI) regarding the lizard management proposed to be undertaken to address adverse effects on lizards from the planned development. Simplicity Living Ltd has requested that Wildlands provide comments in response to the requests from the EPA in their RFI (Table 1).

This letter forms our response to the above requests and includes draft assessment details and management actions that are proposed to be included within the LMP for the Te Pūtahi Ladies Mile development. Note that the proposed management details are in draft form and may change in the final LMP (e.g., dependent on the results of the lizard survey). Appendix 1 includes a brief template of lizard management actions to be included within the LMP.

The following comments have been made by the EPA:

Table 1 – EPA Request for Further Information and Wildland Consultants' response.

EPA RFI Comments	Wildlands' Response
a) Clause 2(1)(k): where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address	- A lizard survey will be undertaken at the 12 Lower Shotover Road site (using Onduline Artificial Cover Objects or funnel traps) and within the pipeline footprint outside of the Kawarau River marginal strip (using tracking tunnels). The survey will be undertaken during warm, calm weather conditions and is planned for spring (i.e. October 2026). - If lizards are present, potential adverse effects of the project on lizards are likely to include accidental injury/death/displacement of lizards within the development area, disturbance to lizards in

EPA RFI Comments	Wildlands' Response
unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife).	surrounding areas from adjacent earthworks (e.g. from dust, vibration and noise), and lizard habitat loss and fragmentation. • Effects on lizards cannot be avoided due to lizard habitat being present within the planned development site. • Effects will be minimised by the implementation of a lizard salvage (using standard accepted methods) and progressive habitat reduction. • Lizards will be relocated to a pre-determined release site where appropriate habitat is present. Dependent on the site determined, enhancement may be required to increase lizard capacity long term. The potential release site is discussed in further detail in Appendix 1. • Where feasible, and guided by detailed design, the development site will include lizard planting and habitat enhancement to remedy for the loss of lizard habitat. • Compensation for residual effects to lizards will be considered, as well as if only low numbers of lizards are detected during surveys (and lizard salvage is considered unfeasible).
b) Clause 2(1)(g): describe the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes – please describe the methods to be used for the Incidental Discovery Protocol. Specifically, how contractors will safely, efficiently, and humanely catch and house any lizards found while herpetologists are not on site.	• Live-capture traps (a mix of pitfall and funnel traps) and manual hand-capture will be used to capture lizards. Lizard trapping and capture will follow best practice as per the DOC Toolboxes for Herpetofauna. • If funnel traps are required to be used in areas of long grass, they will be checked twice daily, and an additional refuge will be placed inside the funnel trap to minimise mouse predation. Contingencies will be required for mouse predation events. • Any lizards captured will be handled and held following best practice and released as soon as practical to the pre-selected lizard release area. • All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers, in cool, full shade until release. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration. • Lizards will be released within six hours of capture into the pre-selected release area. • See Appendix 2 for the full Incidental Discovery Protocol.

PLANNED LIZARD SURVEY

Overview

A lizard survey will be completed in spring (planned for October 2026, during appropriate weather conditions).

Survey methods

Within 12 Lower Shotover Road, Onduline Artificial Cover Objects (ACOs) or funnel traps will be installed on-site and checked daily over a minimum of three days by a suitably qualified herpetologist. If ACOs are used, ACOs will be left in place undisturbed for a minimum of two weeks until the lizard survey is undertaken. Systematic searches of lizard habitat (e.g. checking under debris) will also be undertaken during the survey period.

A lizard survey of the pipeline footprint outside of the Kawarau River marginal strip will be undertaken using tracking tunnels. Tracking tunnels will be left in place for a minimum of two weeks.

Yours sincerely



Cameron Thorp
Herpetologist
Wildland Consultants Ltd

Reviewed and approved for release by:



Samantha King
Associate Principal Herpetologist and Ecologist
Wildland Consultants Ltd

Appendix 1

DRAFT LIZARD MANAGEMENT (TO BE CONFIRMED FOLLOWING LIZARD SURVEY)

Avoidance

Avoidance of lizards and their habitats at the site is not possible. The entire site will be earth worked to prepare for the development. As areas of potential lizard habitat can be found widely throughout the site, avoidance is not possible.

Minimisation – progressive habitat reduction

Progressive habitat reduction will be undertaken in areas of potential lizard habitat and confirmed lizard habitat (to be confirmed following the lizard survey) within the pipeline footprint as described in Section 4.4.1 of the Lizard Habitat Assessment for the Kawarau River marginal strip (Wildlands 2026a).

Progressive habitat reduction will be undertaken during the lizard active season (October-March inclusive) during warm, calm weather conditions when lizards are active.

Minimisation – lizard salvage and release

If ≥ 10 individual 'Not Threatened' lizards or any 'At Risk' lizards are detected during the upcoming lizard survey, a lizard salvage will be undertaken. If between 1–9 'Not Threatened' lizards are found, then a lizard salvage may not be undertaken, and compensation will be provided instead in this case. The Project Herpetologist will determine whether a lizard salvage is appropriate if between 1–9 'Not Threatened' lizards are found (i.e. if nine lizards are found in a small area it will likely be appropriate to do a targeted salvage of that area).

The salvage and relocation programme will be implemented prior to vegetation clearance/earthworks occurring on site within all impact areas where lizards are detected during the survey or are reasonably considered to be present following the survey. All lizards will be trapped using live capture traps and will be relocated to the proposed release site.

Salvage methods

- Live-capture lizard traps will be placed at 5–10-metre spacings in areas of lizard habitat.
- Traps used will be a mix of pitfall and funnel traps. The use of these traps will follow best practice as per the DOC Herpetofauna Toolboxes for Pitfall Trapping (Hare 2012a) and Funnel Trapping (Hare 2012b).
- All live capture traps will be baited with known lizard attractants and padded with grass, and a damp sponge will be added to pitfall traps.
- If funnel traps are required to be used in areas of long grass, they will be checked twice daily, and an additional refuge will be placed inside the funnel trap to minimise mouse predation. Funnel trapping will be stopped if mouse predation occurs.

- Hand-searching techniques will be used to capture additional basking/active skinks. This will involve manually searching through and deconstructing debris piles (where possible).
- Any lizards captured will be handled and held following best practice and released as soon as practical to the pre-selected lizard release area.

Salvage length

The minimum length of the lizard salvage will depend on the abundance of lizards found during the lizard survey (Table 2).

The lizard salvage will be considered completed in each habitat area:

- When there are no skinks captured after the 'Minimum No. of Salvage Days'.
- When trapping reveals trends of decreasing numbers of skinks over the course of the 'Approx. No. of Salvage Days'.

If live capture traps continue to get the same or high numbers of skinks past the 'Approx. No. of Salvage Days' (>3 'Not Threatened' individuals per day or one 'At Risk' individual), then trapping will continue for three-day increments until no more skinks are caught or ≤ 3 'Not Threatened' individuals or no 'At Risk' individuals are caught on any one day after the 'Approx. No. of Salvage Days'¹.

Table 2 – The minimum number of lizard salvage days based on the number of lizards found during the upcoming lizard survey.

No. of Lizards Found During Survey	Minimum No. of Salvage Days	Approx. No. of Salvage Days
10–30	5 days	7 days
>30	7 days	10 days

Temporary holding of lizards

All captured lizards will be temporarily placed in clean individual lizard cloth bags, and stored in ventilated, hard-sided containers (to prevent accidental crushing), in cool, full shade until release. A small amount of damp leaf litter or vegetation from the capture site will be placed inside the cloth bags with the lizard to provide cover and prevent dehydration. Lizards will be released within six hours of capture into the pre-selected release area.

Lizard release area

Overview

The lizard release site is proposed to be created within a protected reserve in the Queenstown area. Permissions to use a specific reserve are being sought. Lake Hayes Wildlife Refuge (Protected Area ID 2804479) is the primary reserve currently being investigated to use as a release site. An appropriate lizard release site will be confirmed prior to undertaking any lizard salvage.

¹ The length of trapping past the minimum requirements will ultimately be up to the discretion of the Project Herpetologist.

Due to the control of predators within a predator-proofed fenced area, the Whakatipu Lizard Sanctuary located at Kelvin Heights may already be at or close to carrying capacity for McCann's skinks and is therefore unlikely to be appropriate for releasing a large number of lizards. Additionally, there may be genetic issues in relocating lizards to the opposite side of the Kawarau River, which forms a significant geographical barrier for natural lizard dispersal.

Release methods

Skinks will be transported by car to the release site. The hard-sided containers that skinks are temporarily held in will be placed in larger bins (fish bins) securely in the car (seat-belted), so movement is limited. Lizards will be checked on release for any signs of stress or illness.

Lizards will be released into pre-constructed habitat units (rock or wood piles) or dense ground cover vegetation. To minimise competition, between 10–20 skinks (depending on the numbers caught) will be released into each habitat unit, or if released into dense vegetation individual lizards will be released at least five metres from each other. Where any lizards are found together or in an aggregation (i.e. multiple captures in one trap), they will be released in groups together.

Proposed release site creation and enhancement

The proposed habitat creation and enhancement described below will provide protective benefit to the lizards proposed to be salvaged from the development site. Proposed release site creation and enhancement includes pest plant control, enhancement planting and plant maintenance, and the construction of additional habitat units. The final habitat creation and enhancement to be undertaken will be determined through consultation between the Project Herpetologist, Simplicity Living Ltd and the release site landowner once a release site has been confirmed.

Pest plants: Initial weed/pest plant control will occur prior to the lizard release. Control will focus on any woody and herbaceous weeds to reduce their abundance within the site and preserve current lizard habitat values (i.e. rank grass). Pest plant control will be implemented in order to have minimal disturbance to resident lizards, including using manual control or targeted spot-spraying instead of aerial spraying.

Enhancement planting: Lizard-friendly plants (tussocks and low-growing shrubs that will provide dense ground cover vegetation) will be planted within the release area. These plantings will be appropriate for the release site location.

Pest plant and enhancement planting monitoring and maintenance: Ongoing maintenance and monitoring of the enhancement plantings will be undertaken to ensure the successful establishment of plantings. Planting will be followed by monitoring visits two to three times a year for at least the first three years to ensure the uptake and survival of plantings and to undertake pest plant control.

Additional habitat units: To increase the amount of suitable lizard habitat, provide additional shelter and protection from predators, and increase carrying capacity within the site, the release site will also be enhanced through the deposition of wood and/or rock piles. The placement of the wood/rock piles will be supervised by the Project Herpetologist to ensure they are placed correctly and that disturbance to the site is minimised. Additional habitat units will be installed prior to the release of lizards.

Remediation

Lizard-friendly plantings

While the majority of the site will be developed, there are sections that will be created as green spaces. Lizard-friendly plants will be planted in these areas where possible. Specific remediation planting will be determined in consultation between the Project Herpetologist and Simplicity Living Ltd.

Compensation

If between 1–9 skinks are found during the lizard survey and a lizard salvage is not undertaken, \$5,000 funding will be provided for lizard research. Funding will be provided to the Society for Research of Amphibians and Reptiles (SRARNZ) or another suitable recipient as determined in consultation with DOC.

REFERENCES

- Hare, K. (2012a). *Department of Conservation inventory and monitoring toolbox: Herpetofauna: Pitfall trapping*. Department of Conservation. DOCDM-760240.
- Hare, K. (2012b). *Department of Conservation inventory and monitoring toolbox: Herpetofauna: Funnel trapping*. Department of Conservation. DOCDM-783609.
- Hitchmough, R., Barr, B., Knox, C., Lettink, M., Monks, J. M., Patterson, G. B., Reardon, J. T., van Winkel, D., Makan, T., & Michel, P. (2026). *Conservation status of reptiles in Aotearoa New Zealand, 2025*. New Zealand Threat Classification Series 50. Department of Conservation, Wellington.
- Jarvie, S., Campbell, C., Knox, C., Monks, J., Purdie, S., & Reardon, J. (2025) *Conservation status of reptile species in Otago, 2025*. April 2025 – Otago Threat Classification Series 11. Otago Regional Council.
- Wildland Consultants Ltd. (2026a). *Lizard habitat assessment at the Kawarau River marginal strip, Queenstown*. Wildland Consultants Contract Report No. 8026. Prepared for Simplicity Living Ltd. 6pp.
- Wildland Consultants Ltd. (2026b). *Lizard habitat assessment at the Te Pūtahī Ladies Mile development*. Wildland Consultants Contract Report No. 8026b. Prepared for Simplicity Living Ltd. 6pp.

Appendix 2

INCIDENTAL DISCOVERY PROTOCOL

Overview

Incidental discovery protocols are set out below for contractors working on site and are to be followed if any lizards are discovered, post-mitigation, during development works.

Where lizards might be found

Lizards could be present amongst vegetation such as rank grass or garden plantings or under pieces of debris (e.g. bits of wood). They may also bask in sunny exposed spots, such as in/on debris piles. They may be uncovered when disturbed by habitat clearance or earthworks.

Following the incidental discovery of a lizard

Immediately (as soon as discovery of a lizard is made) cease any activities within 20 metres of the place of discovery. If the species encountered is a species with a Threat Classification status of 'Threatened' then all works must cease immediately, until an assessment is made of the works programme risk for that species, and any specific management identified, including avoidance.

If possible and safe to do so, the personnel present on site should capture the lizard by hand and place it in a container with grass/leaf litter. If lizard handling is required, handle lizards as gently as possible, keep handling to a minimum, and avoid handling the tail or head of the lizard to avoid causing injury to the lizard. Ensure to create breathing holes in the container for the lizard. Hold in captivity in a **cool, shady** location out of sun until a decision is made.

Immediately inform the Project Herpetologist and Operations Manager on site. The Project Herpetologist will advise on next steps, including where to release lizards.

Document:

- Date and time.
- Weather conditions.
- Observer name(s).
- Photographs of the animal and the location where it was found. Photograph the lizard from above trying to show the head and any markings on the upper body or back. A cell-phone picture is adequate for this and will help with identification of species.
- Location (GPS coordinates).
- Species.
- If injured:
 - What part of the animal is injured? (Photograph the injury.)
 - Time since injury (if known).
 - Probable cause of injury (if known).
 - Immediately (within one hour) contact a local veterinarian and the local DOC office and arrange for the injured lizard to be delivered to the veterinarian. This may require a monetary contribution for care.
- If a carcass is found:
 - Condition of carcass (see below).
 - Approximate time since death (if known).
 - Probable cause of death (if known).
 - Notify the Project Herpetologist at Wildland Consultants immediately. The Project Herpetologist will notify DOC and ask for advice on how to proceed.
 - Arrange for the carcass to be sent to Wildbase (06 350 5329), Massey University, in Palmerston North, unless advised otherwise by DOC.
 - If lizards are unable to be captured and/or photographed, note as much detail as possible: what colour was it; what colour patterns; how big was it; whether it was robust or slender; what habitat was it found in? You may need to describe these details to the Project Herpetologist and DOC.

Should a nationally 'Threatened' lizard species be encountered during construction, the Project Herpetologist will immediately consult with DOC to ask for advice on how to proceed. Further works may not proceed until approval has been granted to continue by the Project Herpetologist and DOC.