



15 November 2016

Ray Ward-Smith
Rural Value Limited
277 Spur Road
RD 5
TIMARU 7975

Dear Ray

**SUBMISSION OF VIEWS ON REQUEST TO CULTIVATE, OVERSOW,
TOPDRESS, CLEAR VEGETATION AND UNDERTAKE TRACKING ON
THE MT WHITE PASTORAL LEASE**

This response to your request is made under delegated authority from the Director-General of Conservation and applies to the following action(s):

1. Cultivation by direct drilling;
2. Fertiliser application including topdressing;
3. Aerial oversowing;
4. Creation & maintenance of tracks;
5. Clearance of bush or scrub on the land.

I have further separated my advice for the purposes of clarity, as in this instance the applications are large and complex. I have considered tracking globally across the property, while other activity types are considered in terms of the following broad geographic units:

1. Esk 1 - terraces located on the true left of the Esk River;
2. Esk 2 - terraces located on the true right of the Esk River;
3. Poulter 1- terraces on the true left of the Poulter River;
4. Poulter 2 - terraces on the true right of the Poulter River;
5. Riversdale Flats.

The attached plan illustrates the location and extent of each of these areas.

Esk 1 - terraces located on the true left of the Esk River

The area encompasses a moderate-large area of terraces between 500 m and 800m asl, on the true left of the Esk River and the western flank of the Puketeraki Range. The area is a predominately native tussock grassland, interspersed with some exotic inter-tussock pasture species, as well as patches of woody native scrub, notably matagouri. Matagouri and some associated native shrublands are present in gullies. The natural



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landscape is an inherent value worthy of protection, which, in my opinion, it is desirable to protect (for conservation reasons).

I consider the following conditions or restrictions (on any consent to the discretionary action) would be reasonable and, if made by the CCL, will avoid, remedy or mitigate all the adverse effects:

1. That the proposed discretionary actions be limited to oversowing and topdressing of the land, and that any cultivation, including direct drilling, not be permitted;
2. That the native tussock cover be retained and not cleared by chemical or mechanical means;
3. That a minimum 20 metre setback from waterways be required as an exclusion zone for oversowing and topdressing;
4. That clearance of native shrublands or scrub (including matagouri) is not permitted.

Esk 2 - terraces located on the true right of the Esk River

The area comprises two small river terraces characterised predominately by depleted exotic grasses and heiracium. The proposed discretionary actions for this area include the clearance of existing vegetation, the application of fertiliser, and cultivation into renewed exotic pasture by direct drilling.

In my view any inherent values identified by the Department will not be adversely affected by the discretionary actions.

Poulter 1- terraces on the true left of the Poulter River

The area mostly comprises exotic pasture, interspersed with patches of matagouri. The landscape character of the area is currently that of a working farm, and ascends from approximately 490m – 800 m asl. The area is already subdivided and fenced into farm blocks. The principal inherent value in this area are the stands of mature matagouri, which in my opinion is desirable to protect.

I therefore consider the following conditions or restrictions (on any consent to the discretionary action) would be reasonable and, if made by the CCL, will avoid, remedy or mitigate all the adverse effects.

1. That a minimum 20 metre setback from waterways be required as an exclusion zone for any cultivation or application of fertiliser;
2. That clearance of mature / significant matagouri (>1.5m in height) be prohibited.



Poulter 2 - terraces on the true right of the Poulter River

The area mostly comprises exotic pasture, interspersed with patches of matagouri. The landscape character of the area is currently that of a working farm, and ascends from the true right of the Poulter River up to the Mt White Road, in a series of well-defined terraces.

The area contains two notable wetlands of inherent value which, in my opinion, are desirable to protect. Both wetlands are located within the Binsler 1 Block, the first immediately west of the Poulter bridge, with the second located further south on the western side of Mt White Road.

I therefore consider the following conditions or restrictions (on any consent to the discretionary action) would be reasonable and, if made by the CCL, will avoid, remedy or mitigate all the adverse effects.

1. That vegetation clearance, application of fertiliser, oversowing, and cultivation by direct drilling be excluded from both wetland areas within the Binsler 1 Block;
2. That cattle be excluded from wetland areas;
3. That clearance of mature / significant matagouri (>1.5m in height) be prohibited.

For any sowing of seed across all application areas, either by oversowing or direct drilling, I recommend that a condition be imposed restricting seed type to only certified pasture, specifically excluding Russell Lupin seed.

LAND ENVIRONMENTS OF NEW ZEALAND

LENZ is a classification of New Zealand's landscapes using a comprehensive set of climate, landform and soil variables chosen for their role in driving geographic variation in biological patterns. The classification units of LENZ, termed land environments, aim to "identify areas of land having similar environmental conditions regardless of where they occur in New Zealand." Therefore "LENZ provides a framework that allows prediction of a range of biological and environmental attributes. These include the character of natural ecosystems, the vulnerability of environments to human activity, and the potential spread or productivity of new organisms". The LENZ information is presented at four levels of detail, with Level I containing 20 environments, Level II containing 100 environments, Level III containing 200 environments and Level IV containing 500 environments. These LENZ classes are presented nationally to assist use at a range of scales.

In an analysis of the LENZ Level IV data, with consideration of the remaining indigenous vegetation cover and the legal protection of these environments, proposed a threat classification for the remaining indigenous biodiversity in New Zealand's environments based on the two components of vulnerability (likelihood of loss): poor legal protection and risk of loss. This threat classification has become the recognised benchmark for the promotion of threatened LENZ conservation.



LENZ threat categories and definitions

Category	Criterion
Acutely threatened	<10% indigenous cover remaining
Chronically threatened	10-20% indigenous cover remaining
At risk	20-30% indigenous cover remaining
Critically under-protected	>30% indigenous cover remaining <10% legally protected
Under-protected	>30% indigenous cover remaining 10-20% legally protected
Less reduced and better protected	>30% indigenous cover remaining >20% legally protected

The majority of the lease area subject to this consent application is 'at risk'. Multiple areas of 'acutely threatened' LENZ units are present, these are predominantly river terraces adjacent to the Poulter River, and at its confluence with the Waimakariri River. Both the acutely threatened and at risk LENZ sites are modified and contain non-indigenous vegetation (see Figure 2).

Riversdale Flats

The Riversdale Flats is a prominent river terrace at the entrance to Mt White Station. The area is bounded by the Arthur's Pass National Park to the north, and the Waimakariri River to the South. The braided riverbed of the Hawdon River bisects the area, and is a popular entrance to the Arthur's Pass National Park. The area is interspersed with parcels of freehold land, with approximately 1,056 hectares held both as pastoral lease and as Reserve 3535 for National Park, pursuant to the Reserves Act 1977. The Riversdale Flats are highly visible from both the Tranz Alpine railway, as well as State Highway 73 as the primary route for travel between Christchurch and Greymouth / Hokitika.

The Riversdale Flats are characterised by fescue tussock, with exotic grasses, particularly browntop, as the primary inter-tussock species. The areas serves as habitat for a variety of river birds, however its most significant inherent value is landscape, which has been evaluated using the following criteria:

- Naturalness: The condition of the natural vegetation, patterns and processes and the degree of modification present.
- Legibility: Expressiveness: how obviously the landscape demonstrates its formative processes.
- Aesthetic Factors: Distinctiveness is the quality that makes a particular landscape visually striking; frequently this occurs when contrasting natural elements combine to form a distinctive and memorable visual pattern. Coherence is based on characteristics including intactness, unity, continuity, and compatibility (intrusions, alterations, disruptions tend to detract from coherence).



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- Historic Factors: Historically valued attributes in the context of a high country landscape.
- Visibility: The visibility of the landscape from public vantage points.

The Riversdale Flats are highly visible from public transit routes, where they appear as a traditional tawny brown tussock landscape, traditionally associated with the South Island High Country. Although interspersed with exotic pastures, the predominance of fescue tussock gives this area a natural, unmodified appearance. The area provides a striking contrast between the native bush line of the National Park to the north, and the Waimakariri braided riverbed to the south. The formative processes for, and ongoing natural dynamism of, this system are clearly evident.

I consider that the setting of any reasonable conditions or restrictions by the CCL will not sufficiently avoid, remedy or mitigate the adverse effects of the proposal to cultivate the Riversdale Flats, as this will permanently and irrevocably alter the character of this significant landscape.

Accordingly I advise that consent be declined.

Furthermore, any agricultural activity proposed for the Riversdale Flats would require the consent of the Minister of Conservation pursuant to the Reserves Act 1977, for those areas held in Reserve 3535. The Department does not consider that sufficient information is currently available to consider a request for any agricultural development activities under that legislation.

Tracking

An extensive network of new tracks are proposed across Mt White Station. The majority of these tracks are associated with proposed pasture development activities in the Esk 1, Esk 2, Poulter 1, Poulter 2, and Riversdale Flats areas. An additional series of tracks are proposed along the true right of the upper Esk River, associated with honey farming activities.

In my opinion it is desirable to protect (for conservation reasons) a number of inherent values which occur in the area affected by the proposed discretionary action. In particular, the effects on landscape and soil stability should be considered, including mitigating the impact of erosion from the proposed activity.

Two proposed tracks fall within the area of Riversdale Flats also held under the Reserves Act 1977 as Reserve 3535 – One Tree Track and the Riversdale 7 proposed track near the Hawdon Shelter. As noted, any agricultural activity proposed for the Riversdale Flats would require the consent of the Minister of Conservation pursuant to the Reserves Act 1977, for those areas held in Reserve 3535. The Department does not consider that sufficient information is currently available to consider a request for any activities under that legislation.

A further three proposed tracks appear to traverse routes over extremely steep or unstable terrain, often ascending from Crown riverbed (Waimakariri and Esk Rivers),



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which are highly visible locations where tracking will have a significant impact on landscape values. These proposed tracks include:

1. Back of Point;
2. Esk – Brechin Burn – White Spur;
3. Esk – Pakety Cutting.

At this point I consider that there is insufficient information regarding the detailed route of these tracks and the impact that these may have on landscape and soil. I therefore consider that the setting of any reasonable conditions or restrictions by the CCL will not sufficiently avoid, remedy or mitigate the adverse effects of the proposal on landscape values or soil stability.

Accordingly I advise that consent be declined or assessment deferred until further detailed information is available.

For the remainder of proposed tracks subject to this discretionary action I consider the following conditions or restrictions (on any consent to the discretionary action) would be reasonable and, if made by the CCL, will avoid, remedy or mitigate all the adverse effects:

1. That tracks be sited in a manner that is sympathetic to landscape;
2. That only minimal vegetation clearance is undertaken to establish tracks, and that significant or mature woody scrub is avoided (matagouri / manuka / kanuka >1.5m);
3. That adequate batters and cut-offs are established to prevent track erosion;
4. That the track surfaces are re-seeded with an approved seed mix (that does not contain Russell Lupins) to minimise soil erosion.

At the time of writing this letter the Department only had available the following information about inherent values:

- the application/request
- the standard information prepared under s.53 Conservation Act
- a site inspection dated 26 October 2016

Please convey these views to the Commissioner so that they may be considered in the decision-making process.



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Yours faithfully

A handwritten signature in blue ink, appearing to read 'K.T.'.

Kingsley Timpson
Operations Manager North Canterbury
Pursuant to Delegated Authority from the Director General of Conservation

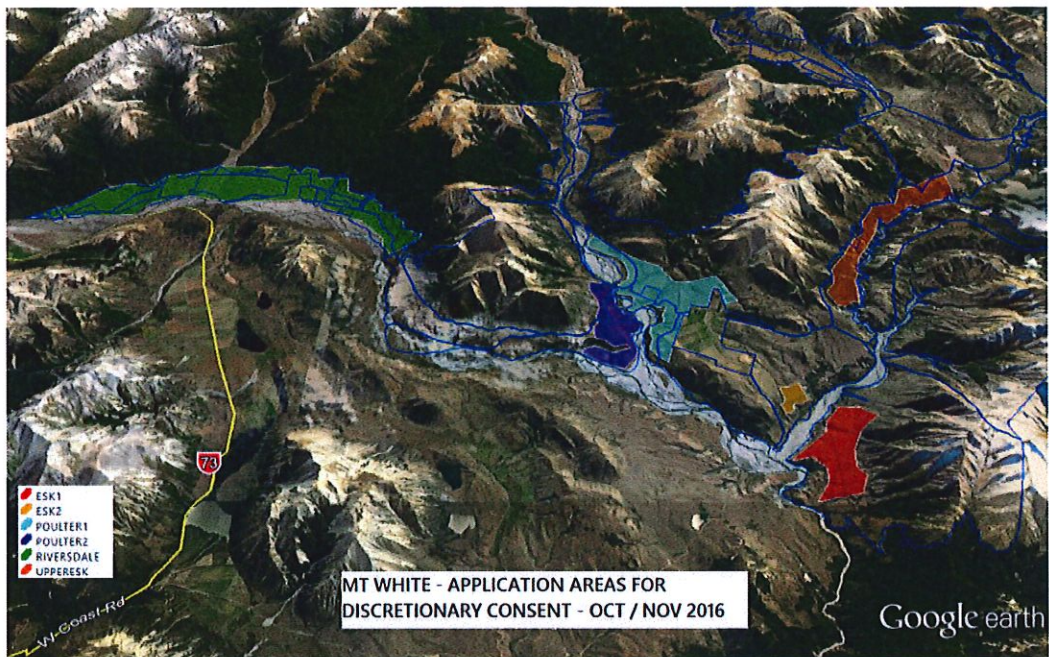


Figure 1: Map broadly depicting application areas for discretionary consent. The advice of the DGC has been provided in relation to each of these areas separately.

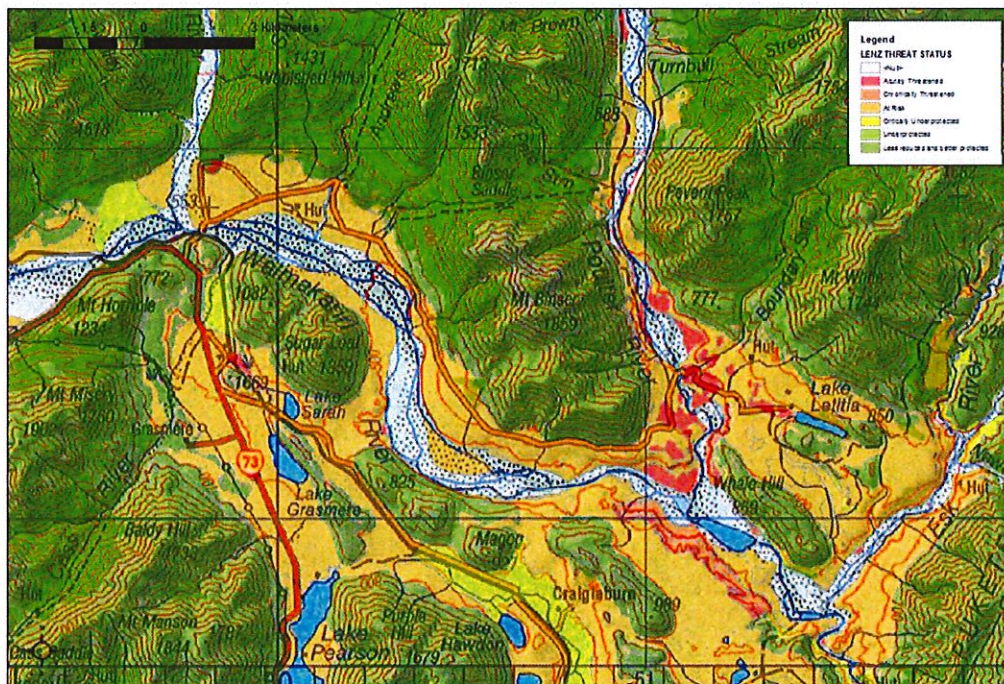


Figure 2: LENZ threat classification as related to Mt White discretionary consent application areas.