



Department of
Conservation
Te Papa Atawhai

File: PAL 14 02 60
Rural Value: Ref: Pc 060 Mt White Pastoral Lease

14 April 2016

Ken Taylor
Rural Value
PO Box 27
Alexandra 9340

Dear Ken

SUBMISSION OF VIEWS ON THE APPLICATION TO SPRAY, CROP AND CULTIVATE AND TOPDRESS DATED 10 MARCH, 2016, MT WHITE PASTORAL LEASE.

This further response to your request is made under delegated authority from the Director-General of Conservation.

In regard to the application for development of the Riversdale Block the Department believes that there are significant inherent values that would be affected by this application. The values are outlined in the attached report and relate specifically to the outstanding natural landscape. The Department does not believe there are any methods of mitigating the effects of the development and that the application should therefore be declined.

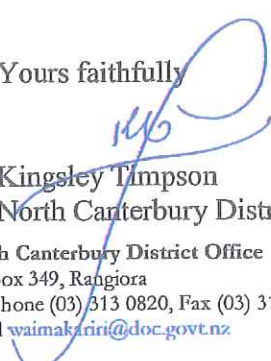
The Department would like to add that it considers an application to the Selwyn District Council would also need to be made for this development.

Further, where development is proposed on land that is Part Reserve 3535 under the Reserves Act 1987, the works may need to be authorised under that Act.

In regard to the application for the development of the Whale Hill block the Department does not believe there are any significant inherent values affected by this application and that the application should therefore be approved.

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

Yours faithfully


Kingsley Timpson
North Canterbury District Manager

North Canterbury District Office
PO Box 349, Rangiora
Telephone (03) 313 0820, Fax (03) 313 0839
Email waimakariri@doc.govt.nz

Assessment of areas proposed for clearance of indigenous vegetation on Mt White Station as part of applications for Crown Pastoral Land Act (CPLA) consents.

Nicholas Head
Technical Advisor - Terrestrial Ecology
Southern Service Centre
Department of Conservation

14/04/2014

Introduction

A rapid assessment of two sites proposed for clearance of indigenous vegetation on Mt White Station was undertaken on the 13/04/2016. Present was Nicholas Head (DOC), Chris Stewart and Alistair Ensor (farm advisor). The weather was fine, warm and calm.

For the purposes of this report, clearance of indigenous vegetation is deemed to include spraying, burning over sowing, topdressing, subdivision, cultivation and any other form of pastoral improvement.

The two sites proposed for development are:

Site 1 – Whale Hill Terraces adjoin the north western flanks of Whale Hill and The Poulter River. This area occurs within the Cass Ecological District. The terraces are classified as comprising both 'Acutely' and 'Chronically' threatened' land environments (Walker et al 2007). Chronically and Acutely Threatened' LENZ retain less than 20% and 10% respectively. The protection of indigenous biodiversity on threatened LENZ is a national priority in the Government's priorities for the protection of indigenous biodiversity on private land (MfE 2007).

Site 2 – Waimakariri Flats are the alluvial terraces that adjoin the Waimakariri River west of the Andrews River confluence. It occurs in the Arthur's Pass ED. It is classified as an At Risk land environment. 'At Risk' LENZ retain nationally between 20%-30% indigenous vegetation.

Relevant Ecological Context

The original (pre-human) vegetation of the Cass and Arthur's Pass EDs is considered to have comprised beech forest associations on mountain slopes to treeline, mixed scrub and tussock grasslands on unstable fans, recent river terraces, and 'leached' moraines. Subalpine scrub and snow tussock grasslands occupied higher altitudes much as it is today (Leatwich et al 2003).

Both EDs retain substantial areas of indigenous vegetation primarily in the 'undevelopable' higher altitudes and steep and rocky topography. Whereas in the Cass ED in particular, the lower altitude valley floors, alluvial fans and gentle slopes have undergone substantial losses of native vegetation, which is typical of the pattern of development throughout NZ (Walker et al 2006). Accordingly much of low lying New Zealand is classified as a 'Threatened' and 'At Risk' Threatened Land Environments (LENZ) (Walker et al 2007)) and is a high priority for protection (MfE 2007).

Description of Sites Inspected

Site 1 – Whale Hill Terraces

This site comprises modified short fescue tussock (*Festuca novae-zelandiae*) grassland that is seriously invaded by Scotch broom (*Cytisus scoparius*). Fescue tussock cover approximates 15%. Exotic grass species, particularly browntop (*Agrostis capillaris*) and Chewing's fescue (*Festuca rubra*), dominates the inter-tussock cover. Scattered native species are present but in low numbers and include, most obviously, dwarf heath (*Leucopogon fraserii*), daphne (*Pimelea oreophila*), blue tussock (*Poa colensoi*). Scotch broom is well established and widespread across the site, which has degraded its ecological integrity considerably. Small plants of matagouri (*Discaria toumatou*) are present and one plant of the grassland Spaniard (*Aciphylla subflabellata*) (declining) was observed.

A small kettlehole is present on the top terrace. It is quite modified and invaded by exotic grasses, but nonetheless contains a number of specialist kettlehole 'turf' species, such as *Dichondra brevifolia*, *Euchiton traversii*, among others. Kettleholes are classified as naturally rare ecosystems which are a national priority for protection (MfE 2007).

For the majority of Site 1, despite being a threatened land environment, there are few grounds for concern to the proposed development as the ecological values present are limited. The site is for the most part is highly modified and has low inherent values. It is not considered to be ecologically significant or have obvious landscape values. Clearance of this site is of minimal concern from an ecological perspective. However, the kettlehole contains sufficient ecological values to warrant being excluded from development.

Site 2 – Waimakariri Flats

This site forms part of the large fan that adjoins the Waimakariri River. The vegetation of the fan is dominated by browntop and woolly moss (*Racomitrium lanuginosum*) that forms consistent cover, albeit exotic grass cover is denser in channels, with greater moss cover on drier convex surfaces. Fescue tussock is very occasional with the exception of one area of denser cover ~ 1 ha where fescue tussock cover approximates 10%. Native species occur sporadically throughout the site, especially on drier stony surfaces. They include dwarf heath, daphne, blue tussock (*Poa colensoi*), *Brachyglottis bellidioides*, *Raoulia subsericea*, dainty daisy (*Celmisia gracilentia*) and mat coprosma (*Coprosma petriei*). Other common

exotic species include mouse-ear hawkweed (*Pilosella officinarum*), sweet vernal (*Anthoxanthum odoratum*), Chewing's fescue, wheat grass (*Anthosachne rectisetus*), sheep sorrel (*Rumex acetosella*) and the occasional plant of Scotch broom. Over all, the site is probably dominated by woolly moss (>50%) with the remainder of the site dominated by exotic grasses. Other than native mosses, native vascular plant cover collectively comprises less than 5% of the site.

Although depleted, this site retains residual ecological values, albeit is a relatively poor example owing to the low cover generally of representative native vascular plant species and the high proportion of exotic grasses present. Development of this site would cause mostly minor loss of botanical values. The overall impact on wider ecological values is possibly larger given to potential invertebrate values present but this is unknown and would require survey to determine.

Notwithstanding the above, this site forms part of a highly visual landscape that borders the Arthur's Pass National Park. It is within the Outstanding Natural Landscape Zone identified within the Selwyn District Plan. It is my view that development of this area is likely to cause considerable impacts on the landscape values present. These impacts will be highly visible from the scenic highway. From what I understand, concerns have previously been raised by the public as a result of development work undertaken on the adjoining area. This highlights the public concern and sensitivity over these landscape values. It reinforces the heightened need for a precautionary approach to be taken. To ensure the integrity of the outstanding natural landscapes values are maintained, the development proposed for Site 2 should be declined.

Other relevant policies - Selwyn District Plan

Relevant provisions within the Selwyn District Plan regarding indigenous vegetation clearances relate to the definition of indigenous vegetation (below). Vegetation that meets this definition means discretion is applied to any proposal to clear such vegetation.

In my assessment of Site 2, it qualifies as indigenous vegetation under the definition below. For these reasons proposals to clear any area greater than 5000 square meters within these sites is not permitted as of right and would require consents from the Selwyn District Council.

***Indigenous Vegetation:** means a plant community in which species indigenous to that part of New Zealand are important in terms of coverage, structure and/or species diversity. For these purposes, coverage by indigenous species or number of indigenous species shall exceed 30% of the total area or total number of species present, where structural dominance is not attained. Where structural dominance occurs (that is indigenous species are the tallest stratum and are visually conspicuous) coverage by indigenous species shall exceed 20% of the total area.*

Conclusions and Recommendations

- Site 1 – Whale Hill Terraces contains low ecological values and its development is of low ecological consequence. The small kettlehole present within Site 1, however, contains sufficient ecological values to warrant being excluded from development
- Site 2 – Waimakariri Fan retains some ecological values although fauna values are unknown. Importantly it part of the Outstanding Natural Landscapes in the Selwyn District Plan. Development of Site 2 is therefore opposed as it is likely to cause considerable adverse effects to significant landscape values.
- Regarding the Selwyn District Plan, Site 2 – Waimakariri Fan, meets the definition of indigenous vegetation because it comprises greater than 30% cover of native species. Any proposed clearance greater than 5000 square meters would require resource consent from the Selwyn District Council.

References

- Leathwick, J. R.; Wilson, D.; Rutledge, D.; Wardle, P.; Morgan, F.; Johnston, K.; McLeod, M.; Kirkpatrick, R. 2003. *Land Environments of New Zealand, Nga Taiao o Aotearoa*. David Bateman Ltd, Auckland. 184 pp.
- McEwen, W. Mary (editor). 1987. *Ecological regions and districts of New Zealand*. Third revised edition. New Zealand Biological Resources Centre Publication No. 5 (in four parts). Department of Conservation, Wellington.
- Ministry for the Environment 2007. *Protecting our Places. Introducing the national priorities for protecting rare and threatened native biodiversity on private land*. Ministry for the Environment, Wellington.
- Walker, S. Price, R.; Rutledge, D.; Stephens, T.; Lee, W. G. 2006. Recent loss of indigenous cover in New Zealand. *New Zealand Journal of Ecology* 30(1): 169-177.
- Walker, S.; Cieraad, E.; Grove, P.; Lloyd, K.; Myers, S.; Park, T.; Porteous, T. 2007. *Guide for Users of the Threatened Environment Classification*. (Version 1.1, August 2007). Landcare Research Limited.

Photos



Photo 1: Site 1 - Whale Hill Terraces with Scotch broom common

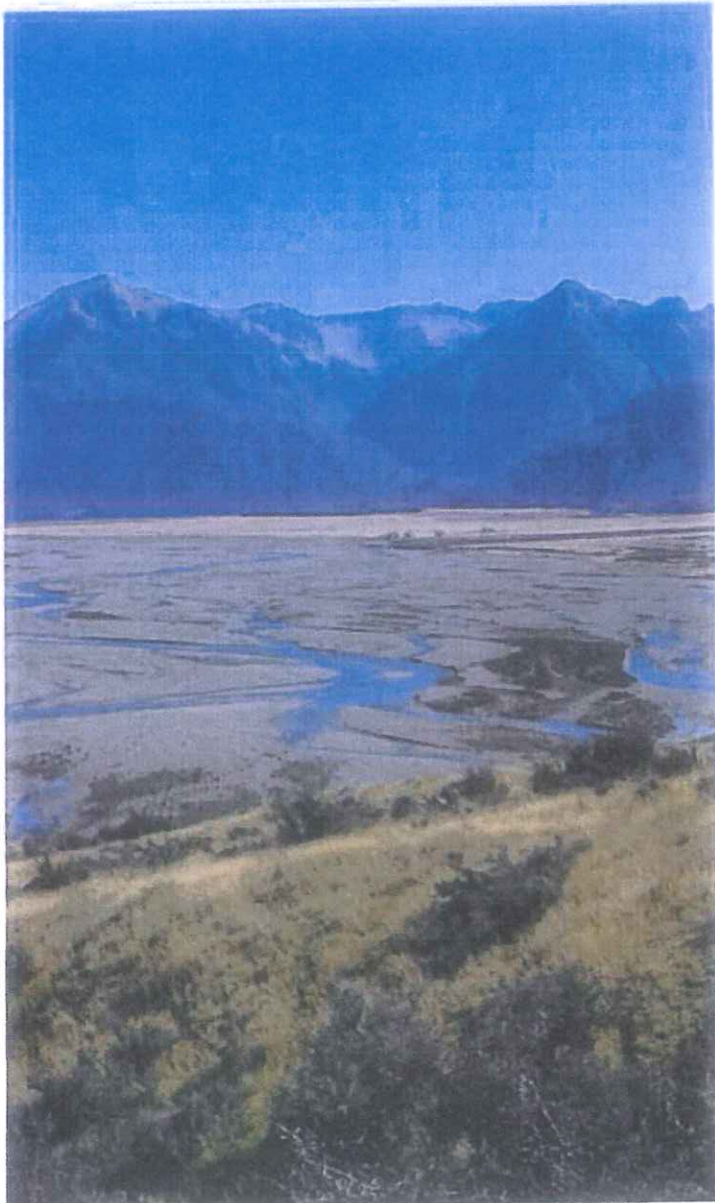


Photo 2: Site 2 - Waimakariri Flats from a distance

Photo 2:

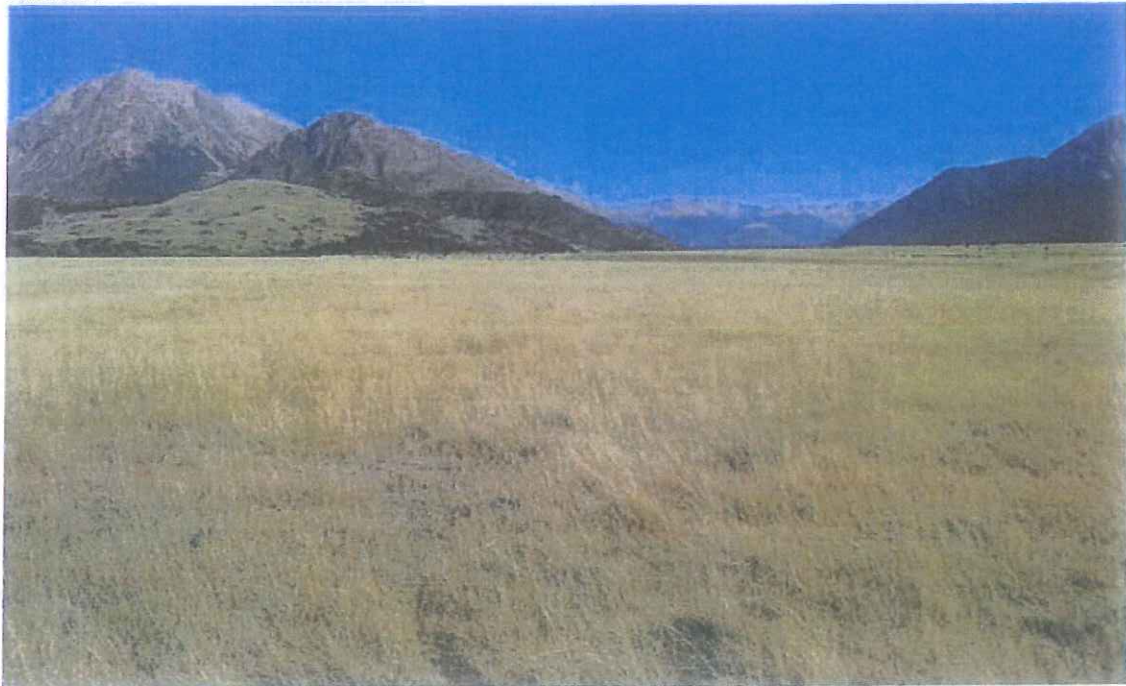


Photo 3: Site 2 - Waimakariri Flats on site



Photo 4: Site 2 – Waimakariri Flats showing dominant woolly moss