

**BEFORE THE CANTERBURY REGIONAL COUNCIL**

**IN THE MATTER** of the Resource Management Act 1991

**A N D**

**IN THE MATTER** of a submission by Simons Pass Station Limited  
to the Proposed Canterbury Land & Water  
Regional Plan

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**STATEMENT OF EVIDENCE OF PETER GLASSON**

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## INTRODUCTION

### Qualifications

1. My full name is Peter Lloyd Glasson. I am a Director of Glasson Resource Management Limited and practice as a project manager and resource management planner.
2. I hold the qualifications of Bachelor of Science (Botany & Ecology), Master of Environmental Science (Honours), and Bachelor of Town Planning, all from the University of Auckland.
3. I confirm that I am authorised to give this evidence in relation to the submission by Simons Pass Station Limited ("Simons Pass").

### Experience

4. I have had over twenty seven years experience in resource management planning, related fields of consents management, and consulting in the private sector. This has involved considerable experience in obtaining resource consents for major projects and includes considerable experience in the preparation of Environmental Effects Assessments (AEE's) and the analysis of District and Regional Plans.
5. I was previously a Director of a major Christchurch engineering, environmental science, surveying, and resource management planning consultancy. I have considerable project experience in similar sized projects.
6. I am the project manager for the irrigation project on Simons Pass Station. I prepared the submission by Simons Pass to the Proposed Canterbury Land and Water Regional Plan ("the Plan").

7. I have undertaken site inspections of Simons Pass on numerous occasions. Mr Tony Wall has been the Station Manager of Simons Pass for twenty five years and is also present today.

### **Scope of evidence**

8. The presentation of my evidence today relates solely to the issue of soil erosion and simply to the maps showing areas of soil erosion on Simons Pass.

### **SIMONS PASS STATION**

9. Simons Pass is a high country station in the Mackenzie Basin. The major part of the Simons Pass Station lies on the western side of the Mary Range and east of the Pukaki River, south of Lake Pukaki, and north of the Tekapo River. Simons Pass Station also owns an area of land on the eastern side of the Mary Range, north of State Highway 8, that is managed as Mary Range Farming.
10. The Plan maps relevant to Simons Pass are Maps 088 and 095. With relevance to this evidence, I have prepared a composite map of Maps B-088 and B-095 of the Plan which shows the areas of supposed "High Soil Erosion Risk" on Simons Pass with black outlines (Appendix A).
11. In summary there are three separate areas shown as being of supposed "High Soil Erosion Risk":
  - Area 1: Farm Block and River Block (glacial moraine)
  - Area 2: Homestead Block
  - Area 3: Mary Range Farming land (east of Mary Range)

12. The Farm Block and River Block (Area 1) is the main farming area of Simons Pass and is heavily pastured in a mixture of tussock, clover, and exotic grasses. There is little land within Area 1 that is not heavily pastured. Most of the land is flat to very gently undulating.
13. The Homestead Block (Area 2) is the area of Simons Pass that is used for annual cropping and silage production. The land has high quality soils and is flat.
14. The Mary Range Farming Land (Area 3) is completely pastured in exotic grasses and clover and is used for the grazing of sheep and beef cattle. Part of this land has been irrigated using water from the Maryburn, and the land has part shares in the Maryburn Irrigation Scheme. The land is completely flat.
15. I can only surmise that no Canterbury Regional Council staff member preparing these soil erosion maps ever undertook a site visit to verify the location of the areas shown.
16. The Mackenzie District Council has recently (02 May 2013) granted a Certificate of Compliance for vegetation clearance for the areas shown on the attached plan (Appendix B). The Certificate of Compliance can only be granted if:

*the land has been oversown and topdressed at least three times in the last ten years prior to new clearance so that the inter-tussock vegetation is dominated by clovers and/or exotic grasses. (Rule 7.12.1.1 (g) of the Mackenzie District Plan) (emphasis added)*
17. The evidence for compliance with this rule was gathered by a Professor of the University of Canterbury who specialises in South Island high country botany and farming systems. He undertook in-depth on-the-ground botanical investigations on these Simons Pass areas shown in Appendix B.

## PROPOSED PLAN PROVISIONS

18. The areas are identified as containing areas of LH2 (land with high soil erosion risk) under the provisions of the Proposed Land and Water Regional Plan. Rule 5.150 of the Plan states that:

*'Within Area LH2 of the Planning Maps and outside any riparian margin, the use of land for:*

- (a) Cultivation or spraying of slopes less than 15°;*
- (b) Cultivation or spraying on slopes greater than 15° provided the total area sprayed or cultivated is less than 200 m<sup>2</sup>;*
- (c) Hand clearance and spot spraying of vegetation;*
- (d) Silvicultural practices of release cutting, pruning or thinning to waste and harvesting by suspension systems;*
- (e) Maintenance of existing firebreaks, roads and tracks and, during a fire emergency, construction of new firebreaks and tracks;*
- (f) Construction of walking tracks no more than 1.5 m wide;*
- (g) Maintenance of existing transport networks;*
- (h) Earthworks and vegetation clearance associated with the establishment, repair or maintenance of pipelines, electricity lines, telecommunication lines and radio communication structures and fences;*

*and*

*(i) Other earthworks where:*

- (i) the volume is less than 10 m<sup>3</sup> per site or per hectare (whichever is the greater); and*
- (ii) the maximum depth of cut or fill is less than 0.5 m;*

*is a permitted activity provided the following conditions are met:*

- 1. Any cleared areas are stabilised and where it is not put to its final use shall be revegetated within 6 months from the date of the commencement of the vegetation clearance or earthworks;*
- 2. Any cultivation is across the contour of the land;*
- 3. When firebreaks, roads, or tracks are constructed or maintained or exotic forest harvesting is carried out, culverts and stormwater controls are installed and maintained to lead water via a channel into an existing watercourse; and*
- 4. the concentration of total suspended solids in the discharge shall not exceed:*
  - (a) 50 g/m<sup>3</sup>, where the discharge is to any Spring-fed river, Banks Peninsula river, or to a lake; or*
  - (b) 100 g/m<sup>3</sup> where the discharge is to any other river or to an artificial watercourse.*

19. Simons Pass is presently designing a new farm access to State Highway 8. The access will involve carriageway widening, bunding, and amenity planting. Because of the quantity of earthworks involved in the amenity bunds exceeding the

(ridiculously small) 10m<sup>3</sup> and 0.5 m cut stated in the rule above, Simons Pass will be required to seek a resource consent from the Canterbury Regional Council because of the error in this Proposed Plan of the soil erosion areas mapped.

20. The proposal exceeds both the volume of earthworks permitted by the rule proposed, and the maximum depth of cut and fill permitted. As such resource consent is required as a restricted discretionary activity, with the Council's discretion limited to the following matters:

1. *The potential for adverse effects on soil quality or slope stability;*
2. *The potential for adverse effects on the quality of water in rivers, lakes, wetlands or the sea;*
3. *The potential for adverse effects on areas of natural character, outstanding natural features or landscapes, areas of significant indigenous vegetation and significant habitats of indigenous fauna, mahinga kai areas or sites of importance to Tangata Whenua;*
4. *The potential for adverse effects on a natural wetland or the banks or bed of a water body or on its flood carrying capacity;*
5. *The potential for adverse effects on transport networks, neighbouring properties or structures;*
6. *In addition, for forest harvesting, the harvesting method, location of haulage and log handling areas, access tracks, and sediment control; and*
7. *The extent to which the proposed activity will prevent or compromise the attainment of the environmental outcomes sought by, or is inconsistent with, the objectives and policies of this Plan.*

21. The Officer report on this soil erosion issue states:

*“the CRC has recognised the somewhat onerous extent of the LH2 zone, the unnecessary nature of the LH1 map layer, and the uninformative nature of the LH1 and LH2 terms. On this basis a revised map layer was produced, that shows only that land that is over 20 degrees in slope and of soil types that are susceptible to deep – seated erosion’ (p423, Section 42A Report – Volume 1).*

22. I note that there are already earthworks provisions contained in the Mackenzie District Plan which require earthworks activities to gain resource consent from that

Council. In effect, resource consent will be required from both the District Council, and from the Regional Council, for exactly the same earthworks activities.

23. I have set out the Mackenzie District Plan assessment matters for earthworks (Appendix C). Any earthworks within Rural zones in the Mackenzie District exceeding 1000m<sup>3</sup> are a full discretionary activity (Rule 7.4.3). In effect, earthworks activities will need to obtain consent from both Councils, creating needless additional cost and bureaucracy. Many of the assessment matters are extremely similar.
24. The revised map layer (proposed by the Reporting Officer) shows no LH2 areas within the Simons Pass areas. However, it is acknowledged that these Section 42A Officer Report recommendations have no statutory status. As a consequence, Simons Pass Station Limited will need to apply for resource consent for its proposed State Highway 8 access from the Canterbury Regional Council on the basis of an incorrect mapping error on the part of the Council.
25. In giving this evidence, I do not represent Simons Hill Station, Maryburn Station, or the Mackenzie District Council. However I am very familiar with the surrounding properties and can state that the land surrounding Areas 2 and 3 is also heavily pastured, predominantly flat, and certainly not susceptible to soil erosion. This includes the land included as the “true” Simons Pass which is known as having some of the best soils in the Basin, is heavily pastured, and sometimes used for crops of rye corn. Part of the Mackenzie District Council forestry block has also been included. This block is flat to gently sloping and is covered in mature pine forest. There is comparatively very very little chance of erosion on this block.
26. In assessing the resource consents that will be required for proposed activities on Simons Pass, a review of the Natural Resources Regional Plan (“NRRP”) provisions was undertaken. The review revealed that the Canterbury Regional Council has placed watercourses on maps including the Simons Pass property that do not exist in physical form on the land. Of course, these “streams” cannot now be removed

from the maps and Simons Pass will be required to apply for resource consents for stream crossings etc for activities in areas where the “streams” simply do not exist. While I have attempted to discuss the issue with the Council staff, this has proved absolutely fruitless and no resolution has been proposed. On the basis of my evidence, I am not convinced that any on site investigations were undertaken before the Council produced the maps – either of the soil erosion areas or of the streams in the NRRP maps. I can only hope that the same mistake is not made again with these supposed High Soil Erosion Risk maps.

## CONCLUSIONS

27. The mapped LH2 “High Soil Erosion Risk” areas shown as being on Simons Pass on Maps B-088 and B-095 of the Proposed Canterbury Land & Water Regional Plan are flat and covered in pasture.
28. The Mackenzie District Council has recently recognised the thick pasture cover of clover and exotic grasses in exactly these areas on Simons Pass by granting a Certificate of Compliance for those areas.
29. The areas shown are completely incorrect.
30. The insertion of these incorrect maps (in both the NRRP and the PLWRP) has, and will continue to lead to needless cost, and bureaucracy on the part of Simons Pass Station.
31. There is considerable overlap between the provisions of the Regional Council and the Mackenzie District Council with respect to earthworks provisions with the result that resource consents will be processed by both Councils considering the same or very similar issues.



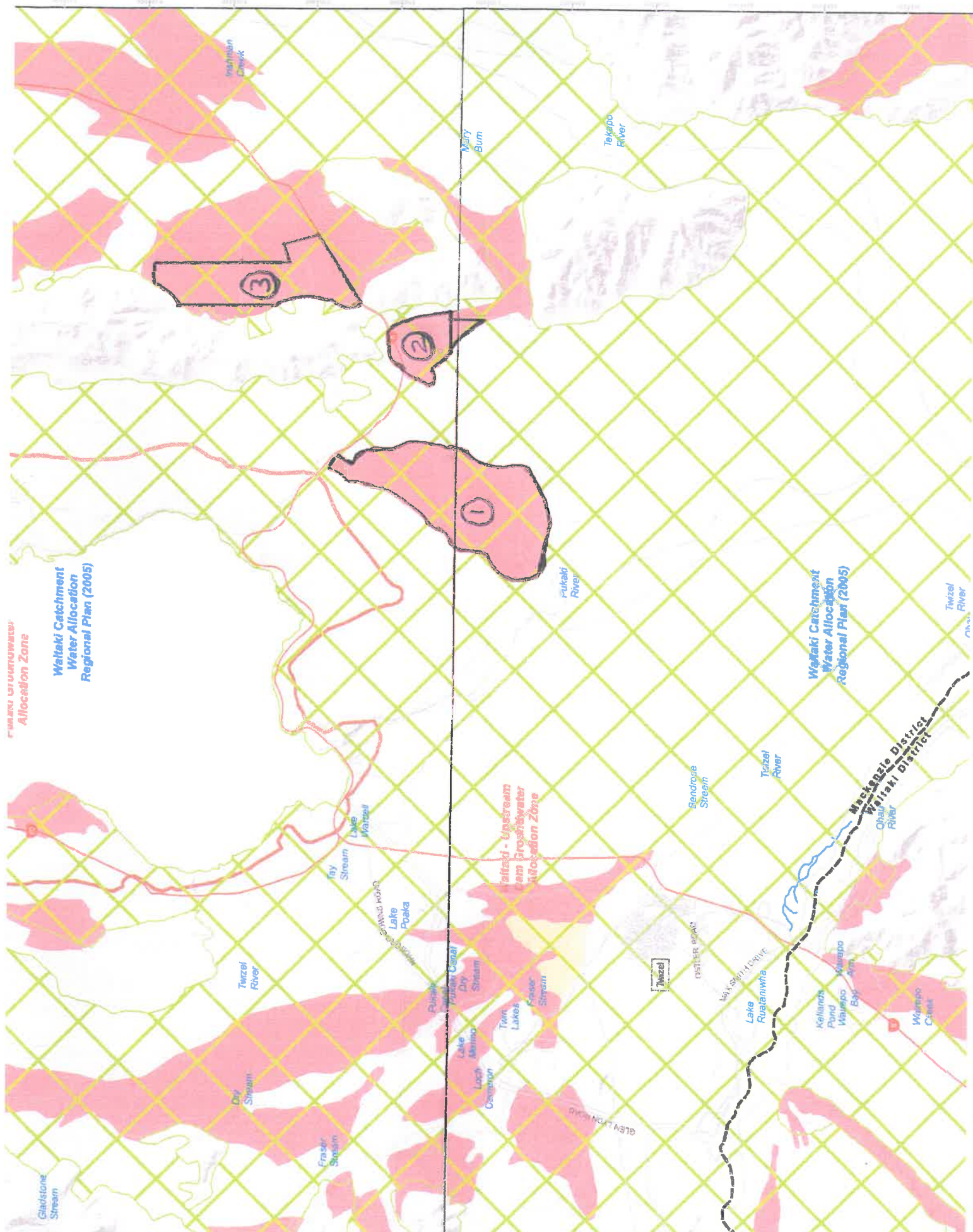
32. Simons Pass Station requests that the PLWRP maps remove the three areas of “High Soil Erosion Risk” as it relates to this Simons Pass Station property.

**Peter L Glasson**

**18 June 2013**

## APPENDIX A

### AREAS OF (SUPPOSED) "HIGH SOIL EROSION RISK"



**Waitaki Catchment  
Water Allocation  
Regional Plan (2005)**

**Waitaki Catchment  
Water Allocation  
Regional Plan (2005)**

**Waitaki - Upstream  
Dam Grossflowwater  
Allocation Zone**

**Waitaki Catchment  
Water Allocation  
Regional Plan (2005)**

Gladstone  
Stream

Dry  
Stream

Fraser  
Stream

Twizel  
River

Try  
Stream

Lake  
Waipai

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Poaka

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Sandra  
Stream

Twizel  
River

Mackenzie District  
Waitaki District

Twizel  
River

Pukaki  
River

Tekepo  
River

Mary  
Burn

Inchman  
Creek

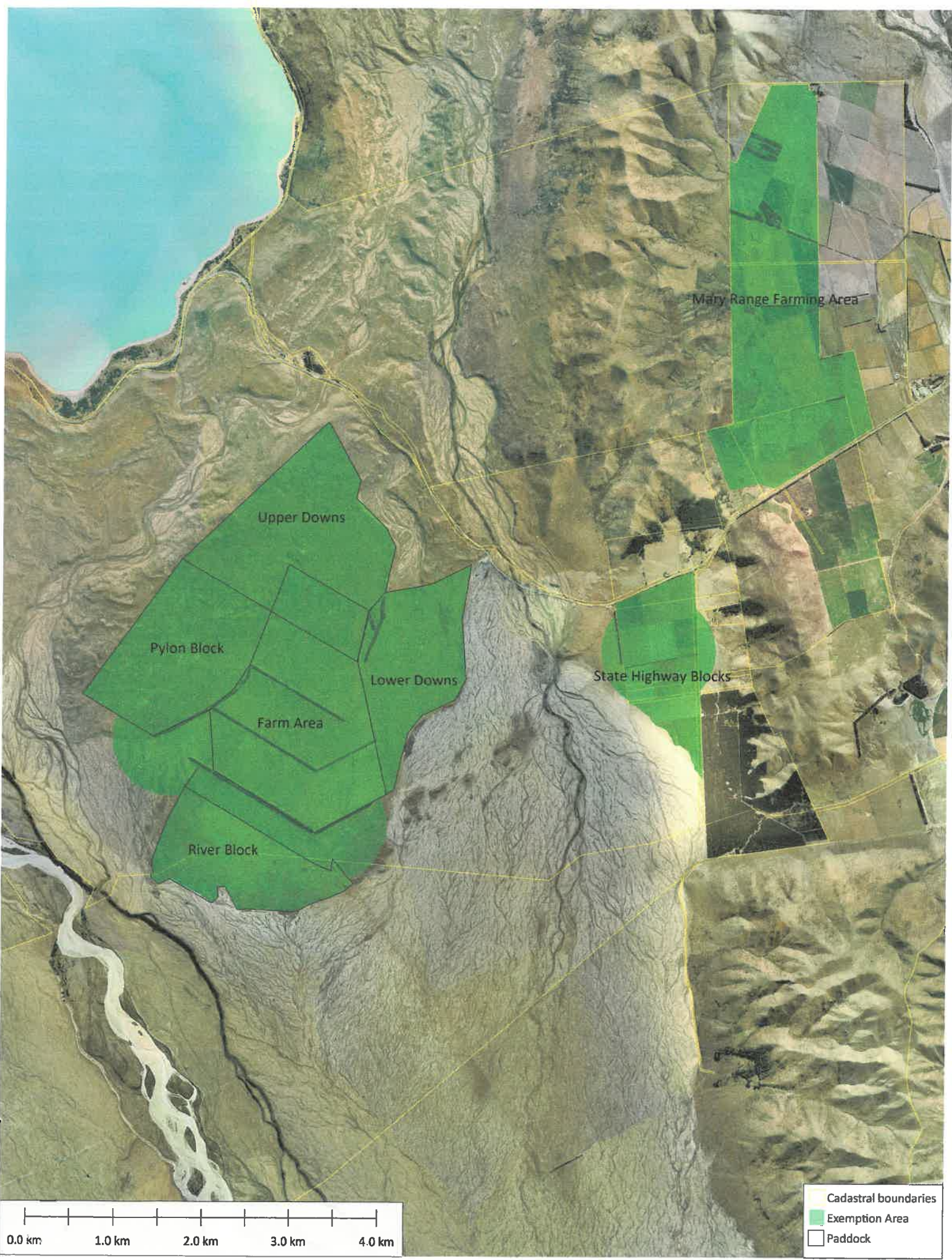
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**APPENDIX B**

**CERTIFICATE OF COMPLIANCE  
MACKENZIE DISTRICT COUNCIL**



Drawing WIG-PUK 271112BH3

## APPENDIX C

### MACKENZIE DISTRICT COUNCIL

#### EARTHWORKS AND TRACKING ASSESSMENT PROVISIONS

##### **16.3 Earthworks and Tracking**

###### **16.3.a Sites of Natural Significance - Refer 16.2.e**

The extent to which other mechanisms, agreements or consents protect the significant natural values of the site.

###### **16.3.b Slope**

- i. The extent to which the environment in and adjoining the site is sensitive to modification.
- ii. The degree to which water habitat may be compromised through runoff and sedimentation caused by earthworks.
- iii. The extent to which the activity will result in a loss of natural character of the area.
- iv. Long term effects on landscape values.
- v. The extent to which the development satisfies the guidelines in Appendix K Landscape Guidelines.
- vi. The extent to which other mechanisms, agreements or consents protect the significant natural values of the site.

###### **16.3.c Riparian Management - Refer 16.2.f**

- i. The extent to which floodwater conveyance will be enhanced without adversely affecting flood hazard elsewhere in the area.
- ii. The extent to which other mechanisms, agreements or consents protect the significant natural values of the site.

###### **16.3.d Geopreservation Sites and High Altitude Areas**

- i. The degree of significance of the landscape, feature or alpine or subalpine environment in the district, region or nationally.
- ii. The extent to which the site is visible by members of the public.

- iii. The extent to which the environment in and around the site is sensitive to modification
- iv. The degree to which there are alternative locations or methods for identifying the activity
- v. The extent to which previous management practices have already significantly modified the characteristics of the site and the cost to the landholder of being unable to undertake the proposed activity.
- vi. The effect of the activity on the overall naturalness, integrity and ecological functioning of the area.
- vii. Impacts of increased nutrients on waterbodies.
- viii. Long term effects on landscape values.
- ix. The extent to which the development satisfies the guidelines in Appendix K Landscape Guidelines.