

Crown Pastoral Land Tenure Review

Lease name: ROLLESBY

Lease number: PT 108

Public Submissions - Part 4

These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

September 10

Submission 11

To the Commissioner of Crown Lands per Mike Todd
Opus International Consultants Ltd
Crown Pastoral Land

Proposed Tenure Reviews for Rollesby, Glenrock and Holbrook pastoral leases

General

The Canterbury/Aoraki Conservation Board recognizes and strongly supports the opportunity that tenure review of these pastoral leases provides to protect a wide range of floristically and fauna-rich landscapes and landforms in this Burkes Pass region.

Importantly, they will safeguard a significant area of this northern 'gateway' to the broad vistas of the Mackenzie Basin. Their importance as protected 'natural' landscapes is heightened with the threat of more intensive land development in this region.

The proposed conservation areas comprehensively represent the landforms, landscapes and ecosystems of the Burkes Pass area and an altitudinal sequence of 1,300 metres (600 – 1,900 masl). Almost all landforms are represented in the proposed conservation areas, ranging from outwash plain, terrace, lower and upper valley floors, sunny north-facing and shady south-facing mid- and upper mountain faces, gentle to steep slopes, rocky outcrops and ridgeline. Of great importance is a small, physically unaltered wetland area.

Protection of these areas reflects the conservation and recreation objectives of the current Conservation Management strategy for this area.

The proposed areas for protection as conservation areas total 5,814.75 ha. Of this area, 1,121.80 ha (737.7 ha on Glenrock and 384.1 ha on Rollesby) are designated with a proposed summer-grazing concession.

Of significance is the continuity of the proposed conservation areas across both Glenrock and Rollesby along the northern Rollesby Range, beginning at the main highway over Burkes Pass.

The Farming Operation

The total freehold area proposed is 7,879 ha, with 2,514 ha on Holbrook, 2,218 ha on Rollesby and 3,147 ha on Glenrock.

The proposed consolidated freehold area provides farming continuity across all present pastoral leases and has the comprehensive range of landscapes to enable successful farming in all seasons ie, the farming/grazing units required for efficient, profitable and sustainable high country farm management. It includes a significant area of higher altitude 'summer grazing' land.

The Canterbury/Aoraki Conservation Board questions the validity of the need to grant 'summer grazing' concessions designated as necessary (=essential) for farm operations. Given the size of the proposed new property and its balance of farming/grazing units, the summer-grazing concessions must be classified as 'convenient' for farming operations but certainly not essential. Given an expectation for greater intensification of some land units under freeholding (compared with pastoral lease), using new and improved technologies, the need for the grazing concessions is marginal at best.

The Board recommends that the grazing concessions are phased out after a five-year transition period.

The proposed easements are justified and acceptable.

The proposed conservation areas contain a wide diversity of plant species, types and communities; tall tussock (Chionochloa rigida and C. macra) and short tussock (Festuca novae zealandiae and Poa cita) associations and ecotones between them, a wide range of divaricating shrubs eg, Coprosma virescens, C. propinqua, C.intertexta, prostrate kowhai (Sophora prostrata), shrub daisy (Olearia odorata), (Carmichaelia spp. Including coral broom (C.crassicaule) and dwarf broom (C. monroi) and porcupine shrub (Melicytus alpinus).

Communities of alpine and subalpine shrubs and herbs are associated with rocky outcrops with the locally endemic Helichrysum plumeum, a compact shrub daisy of particular importance. So too, are native daphnes (Pimelia spp)

On the areas of highest altitude on the Two-thumb Range are herbfields, cushion fields and dwarf shrublands. The only exotic plant species here is Hieracium. Well represented are whipcord hebes (Hebe lycopodioides and H. tetrasticka) and distinctive scree plants such as vegetable sheep (Haastia sinclairii).

Of no less importance than the protection of plant communities in this region is the opportunity to protect the wide diversity of native invertebrates, lizards and birds (including threatened species, New Zealand falcon, black-fronted tern and back-billed gull). The stream protection (eg, upper Sawdon Stream) will enhance indigenous fish species' populations (eg, Galaxiids and upland bully).

Protection of the small areas of physically unmodified wetland near Sterickers Mound and Dog Kennel Corner have special significance because of the relative rareness of wetland in this region, and the potential for restoration to full naturalness following willow removal. These areas are rich in invertebrate species and sedges such as Carex secta and C. flagellifera.

John M Keoghan
Canterbury/Aoraki Conservation Board

24 November 2009

Submission 12

Louise Mincher

From: Mike Todd [mike.todd@opus.co.nz]
Sent: Thursday, 26 November 2009 09:01
To: 'Louise Mincher (Christchurch)'
Subject: FW: Glenrock, Holbrook and Rollesby Tenure Reviews
Attachments: image001.jpg



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From: John Chetwin [mailto:chetwin@xtra.co.nz]
Sent: Thursday, 26 November 2009 8:35 a.m.
To: mike.todd@opus.co.nz
Subject: Glenrock, Holbrook and Rollesby Tenure Reviews

Hi Mike. My apologies for this late submission. I have kept it brief. I hope you can accept it.
Regards, John Chetwin.

NORTH OTAGO TRAMPING AND MOUNTAINEERING CLUB
PO Box 217
Oamaru 9444

Mike Todd
Opus International Consultants Ltd
Christchurch

Dear Mr Todd

Glenrock, Holbrook and Rollesby Tenure Reviews

The North Otago Tramping and Mountaineering Club is generally supportive of the preliminary proposals regarding the above pastoral leases. We particularly note the proposals to allow continued limited grazing of significant areas in the Glenrock and Rollesby leases which are proposed to be returned to full Crown ownership and control. These proposals seem to provide a reasonable balance between traditional farming activities and conservation objectives. They should be able to accommodate the recreational interests of members of this Club.

Yours sincerely

John Chetwin
Secretary

Submission 13

North Canterbury Forest & Bird
P O Box 2389
Christchurch 8140

20 November 2009

Commissioner of Crown Lands
C/- Mike Todd
Opus International Consultants Ltd.
PO Box 1482
Christchurch 8140

Dear Sir,

North Canterbury Forest and Bird submission on the Preliminary Proposal of Rollesby Pastoral Lease



Thank you for giving us the opportunity to make a submission on this proposal, and for arranging permission for Forest and Bird members to inspect the lease on October 31 and November 1, 2009. We appreciate the cooperation of Shane Phillips (Manager) and Ann Scanlon (CEO) of Glenrock Station Limited.

The following submission is made on behalf of North Canterbury Branch of Royal Forest and Bird Protection Society of NZ (Inc.) (Forest and Bird).

Rollesby Pastoral Lease contains land of national importance: for its ecological values (including threatened environments), historical values and its natural landscapes. We recommend this area preferably be restored to full Crown ownership and control as stated in the Objects of Part 2 of the Crown Pastoral Land Act (CPLA) 1998.

The Rollesby Station serves as an important part of the "gateway to the Mackenzie Basin": from Burkes Pass to Dog Kennel Corner with their surrounding environments. The basin is one of the most extensive outstanding natural landscapes in the Canterbury Region, and arguably one of the nation's largest outstanding natural landscapes. It includes the Burkes Pass and Rollesby Range Hills, Rollesby Basin and down to the swamp at the bottom of the Rollesby Fan.

Currently less than 1% of the Grampians Ecological District (ED) is formally protected (*Harding, 2009*)¹. We think that Rollesby Station offers a great opportunity for further protection or restoration of its original ecosystems in this critically underprotected ecological district.

Of the Department of Conservation's Canterbury Conservancy 59 EDs, sorted in order of priority for native scrub protection as at May 2009, the Grampians ED is ranked number 1. The extent of scrub is presently only 3% of ED, compared to an estimated original extent of 45%; with 0% of the present extent protected, or 0% of the original extent protected. "McGlone (2001) proposes that lower montane slopes of the intermontane basins supported mountain toatoa-bog pine scrub, and upper slopes supported low forest and scrub dominated by mountain totara, mountain toatoa and bog pine" (*Harding, 2009*)¹.

Conservation Area (CA1):

We fully support CA1 of approximately 17 hectares being restored to full Crown ownership and control as conservation area pursuant of Section 35(2)(a)(i) Crown Pastoral Lease Act (CPLA) 1998. We believe that this wetland system, together with the adjacent shrubland system is critical to the management of the wetlands in the Bullock Creek/Grays River catchment.

The whole of the Rollesby Fans Landscape Unit is classified as either "critically" or "acutely" threatened, with the Wetland Unit on Rollesby Station classified from "at risk" to "acutely threatened" land environments by LENZ.

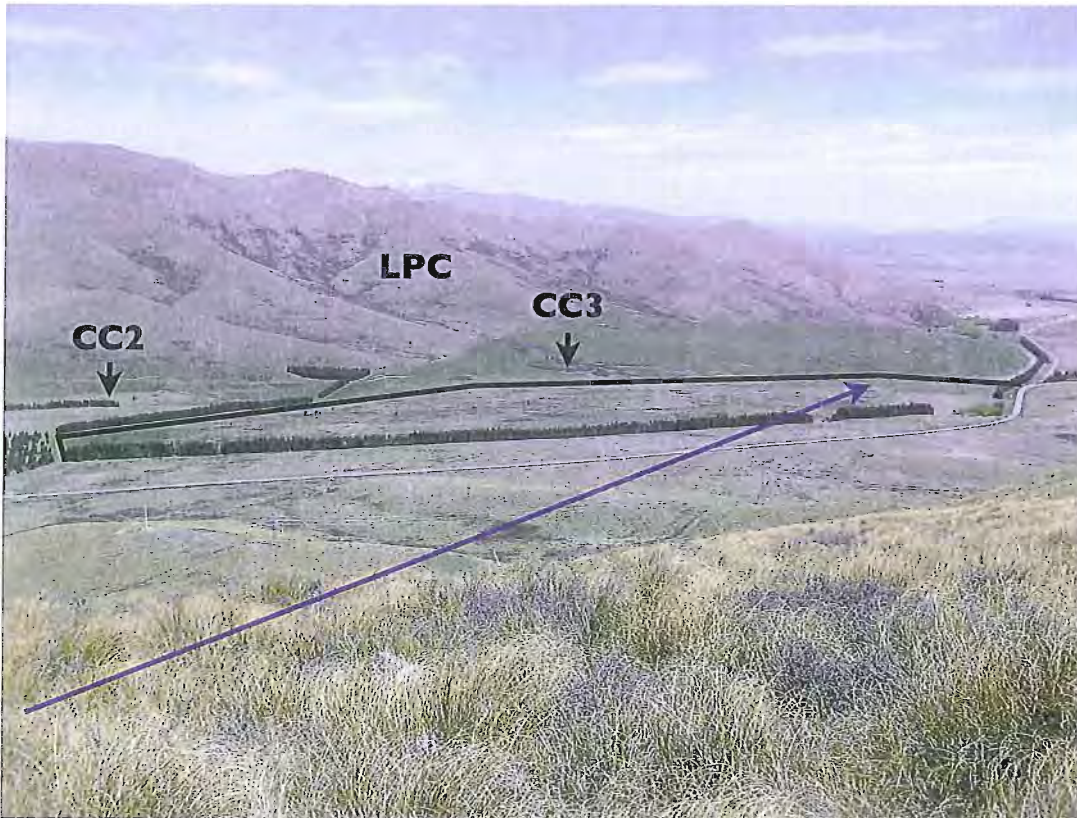
Changes that we believe are needed:

We propose that CA1 be expanded to form an 80 meter buffer zone around all of its wetlands edges.

We also propose that another **Conservation Area (CA3)** upstream of CA1 be formed adjacent to the Burkes Pass Scenic Reserve (see photos and map). This area will recover to its full vitality as a wetland if retired from pastoral use. A protective riparian strip stream corridor between these two conservation areas should also be fenced off by 10-15 meters either side of the stream to stop grazing and be replanted in native vegetation to help protect the water quality entering the proposed CA1 wetland downstream. It will make little sense to conserve CA1 unless there is conservation management upstream.

There is also an opportunity in the Bullock Creek/Grays River catchment to obtain a full altitudinal sequence from the mountain tops on Holbrook Station, through the Burkes Pass Scenic Reserve to the valley floor wetland on the Rollesby Station. This would incorporate riverine and wetland landscape if the swamp on Rollesby next to the Scenic Reserve is conserved, rather than made freehold as is proposed. Such a conservation designation, with the removal of the pine belt along State Highway 8 (SH8), would open up the whole area as an integral and robust conservation area.

¹ Harding, M.A. 2009. *Canterbury Protection Strategy*. Nature Heritage Fund. 117p + appendices



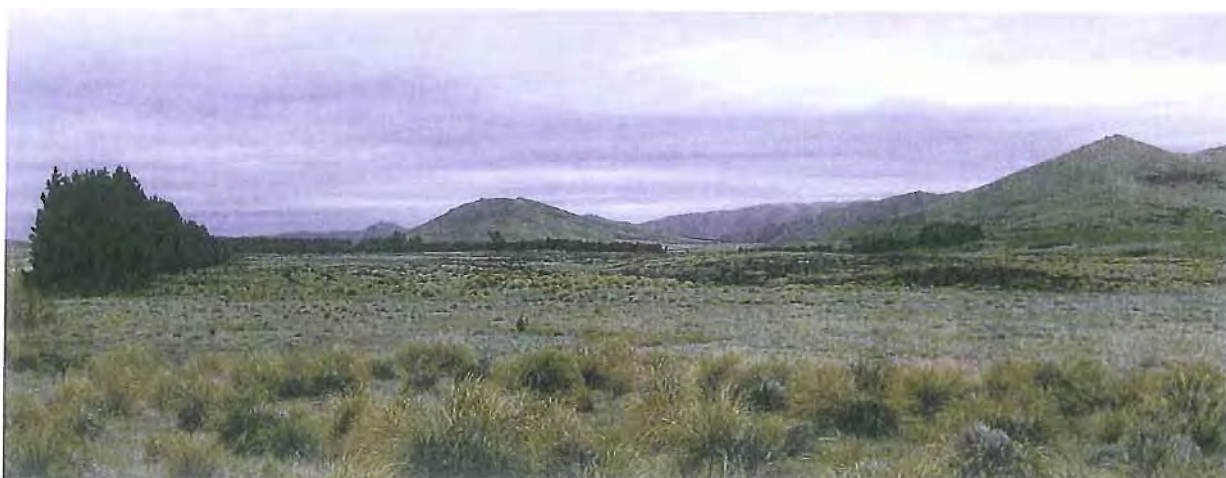
Looking down from a ridge above Corner Hill at the altitudinal sequence being proposed for protection as conservation area. (Covenants noted for later.)



An approximate sketch of the boundaries of proposed CA1 (middle willows), the critical stream corridor and new CA3 being proposed from the same ridge as pictured above.

The existence of tall tussock down to Dog Kennel Corner (probably at its lowest altitude in the basin), which is readily viewable and accessible from the major SH8 is special. This is reported as being “the only place along the highway in the Basin where this is experienced, and it is a rare corridor experience in the South Island” (Conservation Resources Report (CRR)).

The newly proposed swamp CA3 next to the Scenic Reserve also forms a very important fire and ecological buffer zone for the last remaining known habitat for what is perhaps New Zealand’s rarest invertebrate, the Canterbury knobbed weevil (*Hadramphus uberulatas*). This weevil was once widespread among the lowland areas of Canterbury and was thought to be extinct since it was last sighted in 1922, until it was rediscovered in the Burkes Pass Scenic Reserve in 2004. The Department of Conservation has given this knobbed weevil its highest conservation status ranking for protection. The decrease in the population and distribution of the weevil may have resulted from predation by introduced mammals and habitat loss, which will only increase and be potentially further be lost respectively, if the swamp and the native habitat next to the Reserve in Rollesby is not conserved. We observed that this area has a high percentage of native plant species including speargrass (*Aciphylla aurea*) which is the weevil’s host plant.



Looking up from SH8 at the new conservation area being proposed behind the shelter belt, backing the Burkes Pass Scenic Reserve.

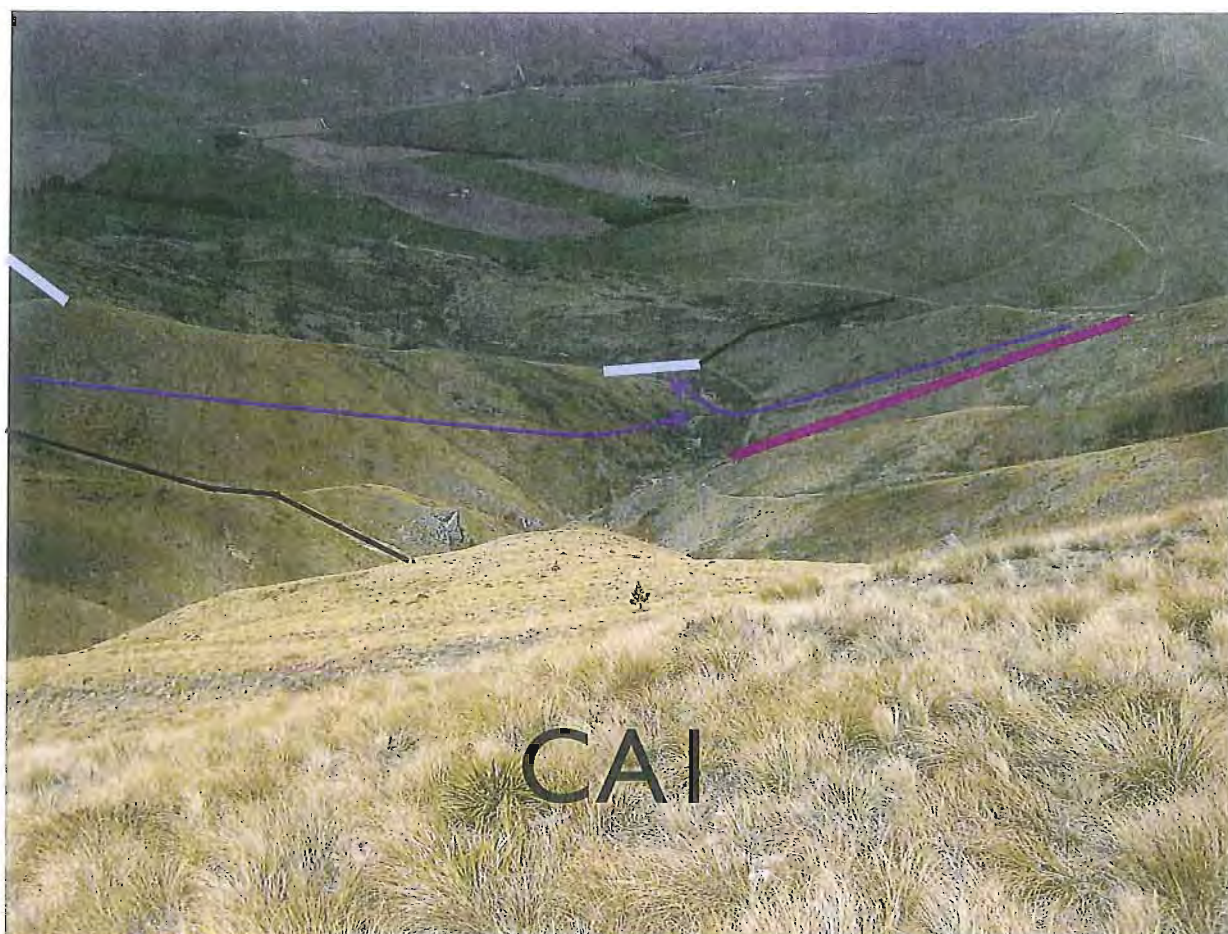
Conservation Area (CA2):

We propose that CA2 of approximately 384 hectares be restored to full Crown ownership and control as conservation area pursuant of Section 35(2)(a)(i) CPLA 1998. We do not support the continued grazing of this area with a concession in favour of Glenrock Station Limited pursuant to Section 36(1)(a) CLPA 1998.

This area contains strong populations of the locally endemic shrub daisy *Helichrysum plumeum* that grows mainly on rock outcrops; snow tussock grasslands in the best condition on the range, including both narrow-leaved and slim snow tussock; impressive swards of slim tussock grassland, with an excellent area of alpine *Dracophyllum uniflorum* shrubland-*Chionochloa rigida* grassland associations, at relatively low elevations. This area has been recommended for protection as Grampians ED RAP 1.

Of the Department of Conservation's Canterbury Conservancy 36 ED, sorted in order of priority for alpine protection as at May 2009, the Grampians ED is ranked number 2. The extent of alpine ecosystems is presently 16% of ED, the same as the estimated original extent; but with only 2% of the present extent protected and 2% of the original extent protected (*Harding, 2009*)¹.

The eastern and southern side contains dense tall tussocks, extending well down their slopes, down into grey scrub. The additional boundary fencing proposed on the eastern side, to be erected along line "U-V" for approximately 700 metres, could instead be placed at approximately the same length in the catchment north of the centre one photographed below (also see our designation map). This would then produce an important altitudinal sequence down to and including some of the threatened grey scrub of this ED on the eastern side of the range.



¹ Harding, M.A. 2009. *Canterbury Protection Strategy*. Nature Heritage Fund. 117p + appendices

Freehold

We support the disposal of Rollesby Station by freehold to Glenrock Station Limited pursuant to Section 35(3) CPLA 1998 subject to IVA Conservation Act 1987 and Section 11 Crown Minerals Act 1991, subject to the following:

Protective Mechanisms:

We propose a Conservation Covenant (CC1) of approximately 36 hectares on the native shrubland/snow tussock slope that overlooks SH8, because of its scenic "sense of place" value, on the left when approaching the Burkes Pass (with Memorial) from the east. Protecting the vegetation from clearance, with limited sheep grazing, under Sections 40(1)(b), 40(2)(a) and 40(2)(b) of the CPLA 1998 would help maintain the distinctive native visual corridor along SH8 through Burkes Pass.

Two additional Conservation Covenants (CC2 & 3) (see map) would benefit the areas of threatened native vegetation/environments as natural corridors in the developed areas of the Rollesby Fans/Swamp/Basin area under Sections 40(1)(b), 40(2)(a) and 40(2)(b) of the CPLA 1998. A total restriction of native vegetation clearance and grazing would preserve the landscape and natural environment.

We further propose a Landscape Protection Covenant (LPC) over part of the freehold land under Sections 40(1)(b), 40(2)(a) and 40(2)(b) of the CPLA 1998 for the purpose of preserving the landscape and natural environment.

The northern boundary of the LPC area could run along fence lines as follows:

- from the western boundary with Glenrock Station;
- behind CA1 and a line at the back of the Rollesby Fans;
- across the lower part of the low hills of the Rollesby Range;
- across the upper part of the Rollesby Basin;
- finally running north to Burkes Pass, in line with the easement proposed below.

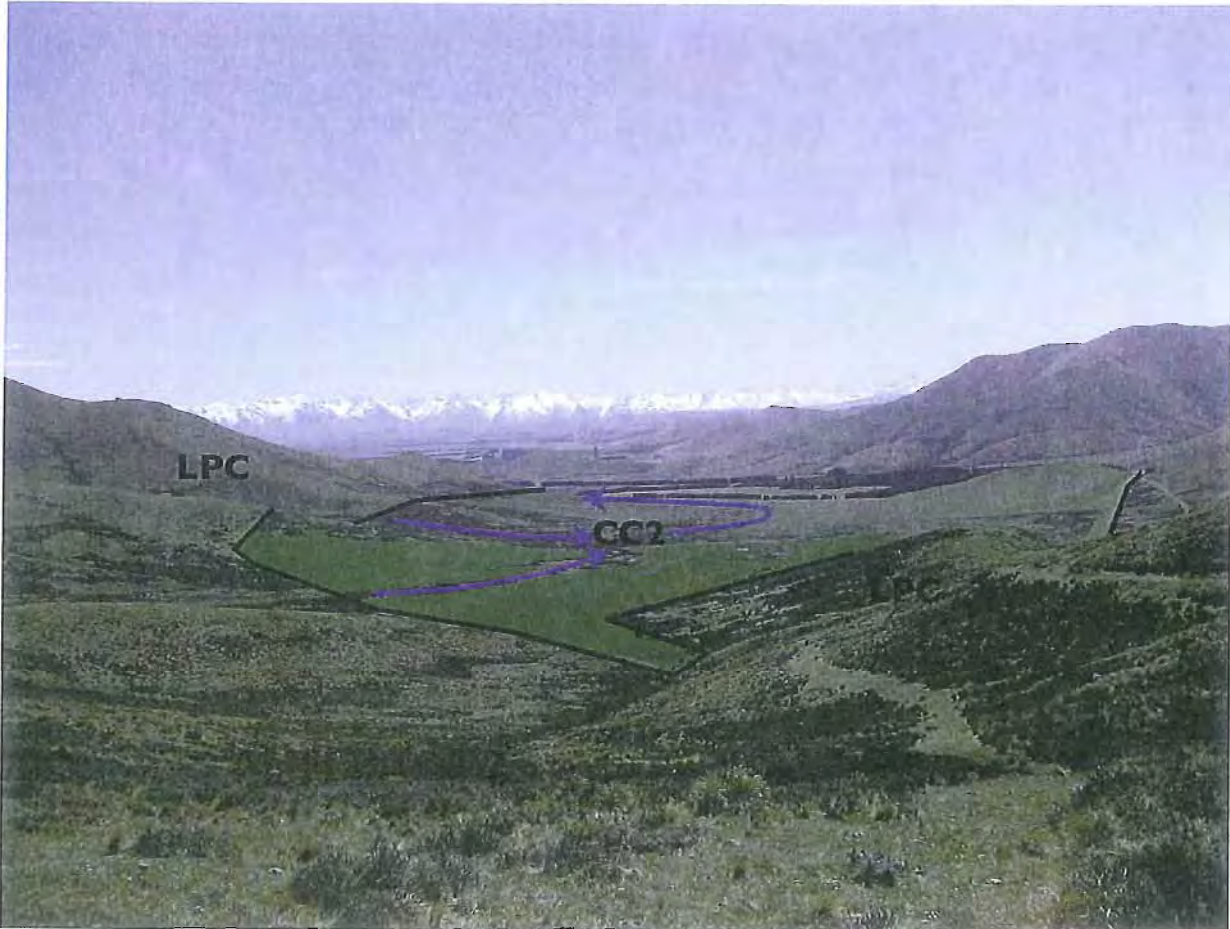
The east and south boundaries, run along fence lines as follows:

- from the bottom of the farthest ridge of the Burkes Pass hills facing the pass area;
- up and along the fence line on top of the main ridgeline up to CA2 in the high hills of the Rollesby Range;
- finally running west along the CA2 and Glenrock Station boundaries.

At present these higher areas in and above the basin facing Burkes Pass are large intact mid range tussock grasslands. In order that their inherent biodiversity values and valuable visual integrity viewed from Burkes Pass SH8 are maintained the areas require at least some form of protective covenant placed over them, especially on the steeper slopes. Any adverse effects from development in these areas could also affect their soil and water conservation values, if their intact vegetation cover is not retained. We believe this vegetation if left intact could sequester carbon and gain carbon credits because of its semi-degraded state, which could become an important potential source of farming revenue and environmental branding for the future of farming on this station.

Qualified Designation:

We fully support the easement (a-b) to provide public and conservation management access pursuant to Section 36(3)(b) of the CPLA 1998.



Looking down the Rollesby Basin, toward the Southern Alps in the distance, from the proposed public access easement.

Once again, we thank you for giving us the opportunity to make a submission on this proposal.

Yours faithfully

Andrew Simpson

North Canterbury (Branch Secretary)
Royal Forest and Bird Protection Society of New Zealand Inc.
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Attachment 1: Map of Proposed Tenure Designations

