Simons Hill
Simons Pass

BEFORE THE MACKENZIE DISTRICT COUNCIL

IN THE MATTER Of Proposed Plan Change 13 to the Mackenzie District Plan

A N D

IN THE MATTER of Submissions and Further Submissions by Simons Pass Station Limited, Pukakai Irrigation Company Limited and Simons Hill Station Limited

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STATEMENT OF EVIDENCE OF DENIS ALAN FASTIER

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Introduction

1 My name is Denis Alan Fastier. I am a Director of Simons Hill Station Limited and Pukaki Irrigation Company Limited.

2 Simons Hill Station Limited owns Simons Hill Station, which is located in the Mackenzie Basin and comprises approximately 6282 hectares. It is the immediate neighbour of Simons Pass Station, which comprises approximately 6432 hectares.

3 Simons Hill and Simons Pass are joint shareholders in Pukaki Irrigation Company Limited. Pukaki Irrigation Company will be responsible for facilitating the irrigation of an area of land known as Pukaki Flats (provided the necessary consents are obtained). Pukaki Flats comprises approximately 4000 hectares, which is effectively shared between the two stations.

4 Because of the inter-relationship between the two Stations and the commonality of issues facing the two, I am authorised to give this evidence on behalf of Simons Hill, Simons Pass and Pukaki Irrigation.

5 I have been in the business of farming merino sheep and cattle for 36 years, and farm ownership for 34 years. The first 22 years were spent in Central Otago on the Pisa Range farming dry High Country and the last 14 have been at Simons Hill.

6 In my evidence, I will cover:

i. Current farming operations on Simons Hill and Simons Pass;

ii. The sustainability of present farming practices in light of the challenges posed by nature and changing times;

iii. The opportunity offered by irrigation in terms of sustaining farming practices in the long term;

iv. The need for flexibility and certainty in respect of building rights in order to realise the potential benefits of irrigation;

v. The drawbacks of the areas identified by the Council as suitable for nodal development.

Simons Hill Station

7 As described above, Simons Hill Station is located within the central Mackenzie Basin and more particularly it is on the southern side of SH8 midway between Twizel and Tekapo. **Attached** and marked "**A**" is a map showing the Station's boundaries.

8 The Station has been through the tenure review process and as a result of that process 5976 hectares of land are in freehold title and 407 hectares of land were vested in the Crown. An additional adjoining and freehold title of 306 ha gives the total holding of 6282 hectares.

9 I own the Station jointly with my partner Jane and my son Glenn. It is managed by Glenn, Jane and myself with the help of contractors for shearing and silage making and casual labour at other key times of the year. With the completion of a second homestead late last year we all now live on the property. We are well down the track with a farm succession plan.

10 Present operations on Simons Hill Station include 7000 ewes, 4500 hoggets and 80 beef cows. Merino wool is our principal income, but all merino lambs are taken through their first winter, shorn and all wether lambs are killed fat at one year of age. All ewe lambs surplus to requirements as replacements are also killed fat at the same time. Beef cows are a recent addition to our stocking policy and at this stage all calves are sold as weaners.

11 The property is 30% hill, ranging in height from 500 to 1000 metres asl and 70% flat. The flat areas range from very light soils to very heavy soils with approx 3000 ha tending toward the lighter end of the scale. Notably, these lighter soils are almost solely found on the Pukaki Flats, which is currently not grazed.

12 Simons Hill was split off Simons Pass in 1911 under the Government Land Settlement Scheme, and farmed by the Hosken family for 83 years. I purchased the pastoral lease property in 1994. The carrying capacity in 1994 was 2500 ewes. We knew that productivity would need to be improved considerably to make farming a viable proposition into the future. The property was largely undeveloped or reverted at the time we bought it, but our experience developing similar properties in Central Otago gave us confidence that we had the skills and knowledge to lift productivity significantly.

13 Since 1994 we have:

i. aerial oversown and topdressed 1500 ha of the hill country;

ii. constructed 140km of subdivision fencing;

iii. installed 35km of reticulated stock water;

iv. established 530 ha of improved dryland pastures including lucerne, on the better flats;

v. developed 150 ha of centre pivot irrigation, to utilise the existing water right that had only previously irrigated, by wild flooding, a much smaller area.

14 These measures have boosted the capacity of the Station. However, as I will go on to explain, more needs to be done. The investment in the development of these better soils would be in excess of two million dollars.

15 We have now developed all of the better soils but still have over half the farm (3000 ha) of lighter soils undeveloped. This is basically because it is a waste of resources (time and money) applying the above techniques ie, oversowing, topdressing, or direct drilling in the absence of adequate available water to irrigate the lighter soils. Essentially, anything we do will blow away.

16 The principal area of lighter soils is what we call the Pukaki Flats. It is that area bounded by the Tekapo River, the Pukaki River, the actual Simons Hill, and extends almost up to State Highway 8.

17 These lighter soils fall outside the threshold for economically viable development. They are shallow, raw, lacking in structure and any organic matter. This makes them unsuitable for dryland pasture development as the risk of establishment failure is extremely high. Even if we were lucky enough to succeed in establishing pasture cover initially, the chances of the plants growing on and becoming robust enough to withstand successive dry years are slim. Even assuming you overcame the previous two hurdles the total annual drymatter production is unlikely to cover annual maintenance costs, let alone a return on investment.

18 Apart from the recent addition of a second homestead, the buildings on Simons Hill are minimal, and have all been there a very long time. Our focus has been on increasing production and many of the buildings are old and inadequate. There are two houses, a woolshed, a workshop, a storage shed, and two haybarns plus a set of sheep yards and cattle yards.

Simons Pass Station

19 Simons Pass Station adjoins Simons Hill Station. **Attached** and marked **"B"** is a plan showing the Simons Pass boundaries. It comprises approximately 6432 hectares.

20 Simons Pass is currently going through the tenure review process, therefore most of the Station is presently managed under the terms of a pastoral lease from the Crown. There are 5658 hectares of pastoral lease and 774 hectares of freehold.

21 Simons Pass Station is owned by Simons Pass Station Limited, the directors of which are Murray and Barbara Valentine. The Station is managed by Tony Wall who lives at the Station homestead with his family. An additional staff member is employed and lives in a cottage on the property.

22 Present operations on Simons Pass are essentially the same as those on my Station, namely running 7950 merino sheep and up to 150 cattle.

23 Unlike Simons Hill, Simons Pass Station has less variable topography with the majority being flat to rolling country. Simons Pass is also subject to variable soil quality with approximately 2000 Ha of lighter soils, mainly found on the Pukaki Flats area of Simons Pass adjacent to the Simons Hill Pukaki Flats.

24 The better soils have previously been developed and are currently being rejuvenated. The property also has 120ha of border dyke irrigation, but during a recent renewal of the irrigation consent, the minimum flow that must be maintained in the Maryburn Stream (the source of irrigation water) was increased. This water right is now unreliable and it is completely ineffective. This was a very serious blow to the balance of the Station.

25 The lighter soils face a similar challenge in respect of development as those on Simons Hill, but unlike Simons Hill where there is no grazing of the lighter soils there is limited grazing at Simons Pass. The cut off between the lighter and better soils is not as distinct on Simons Pass so that areas of lighter soils that are grazed are generally supported by small areas of better soils dispersed throughout.

26 The buildings on Simons Pass consist of a homestead, cottage, shearers quarters, woolshed, implement shed, and haybarn all around the existing farmstead settlement just north and close to the main highway. There is also a hayshed and storage shed north of SH8 on the freehold title and outside of the existing main farm settlement.

Sustainability of Present Farming Practices

27 Both Stations face a major problem – being that all of the fixed costs for the total farm are borne by the productive portion of it. The Pukaki Flats constitute a substantial portion of each Station that is currently un-used or close to it. In the past, the Flats were able to carry stock. However, through a combination of natural factors including hieracium, soil erosion and pests, the Flats are now devoid of productive growth. Yet we have to pay rates for the entire area and carry out ever increasing levels of pest control (rabbits and hares) over the entire farm and weed control (wilding pines and sweet briar) over the developed areas.

28 With increasing costs such as fertilizer which looks set to double in price, seeds, fuel etc any increases in the price for meat and wool from their current low levels are likely to be countered, and the economic viability of present practices is becoming more and more marginal. In short, we need to utilise much more of our land to sustain our operations into the future.

29 With the drier seasons that we have been experiencing this decade, farming in areas like the Mackenzie Basin has become increasingly difficult without irrigation. We are experiencing a 3-fold variation in dryland dry matter production from a dry year to an average year. The annualised stocking rates of our dryland lucerne paddocks this last six years have alternated between 3 stock units per ha and 9 stock units per ha. This makes maintaining a base stocking rate in a dry year very difficult, and utilising all the feed in an average year equally challenging, especially if you have not been able to maintain your base stocking rate. At 3 stock units per ha no lucerne is able to be conserved for winter feed, so in 3 of the last 6 years we have been totally dependent on our irrigation for winter supplements. Simons Pass, without reliable irrigation has had to buy in supplements for winter feed.

30 Most farms in the Mackenzie sell store stock. With the increase in dairying and cropping down country the number of finishing farms has diminished, and consequently the demand and price for store stock has dropped. Being able to finish your store stock has shifted from being an option to a necessity. Not all properties have land suitable for irrigation but those that do can finish other's surplus stock. If all stock bred in the Mackenzie was finished there we have an opportunity to create a Mackenzie brand, and branding is the way forward.

31 In addition, after many years of investigation and commissioning independent advice, we know that adaptation of present practices is the only solution to the significant land use challenges we face – namely, hieracium, soil erosion, rabbits and wilding pines.

Tussock Grasslands

32 There is a common misconception that farming practices are responsible for the dwindling tussock stock in the Mackenzie District. In fact, dryland farming and tussock can and did live happily together for years. Tussock grassland is not a natural state for the Basin floor. It is an induced state bought about by burning the native scrublands both pre and post European settlement. Tussock grasslands require inputs and management to survive, or else they will revert to a scrubland, or given the now dominant seed source, a pine forest.

33 When we arrived at Simons Hill in 1994 the Flats had been grazed and yet there was a strong, healthy, fescue tussock grassland as shown in the 1995 photograph **attached** (marked **"C"**). At that time, I employed Dr Brian Molloy, a botanist with a lifetime of experience in the High Country, to advise me on how to manage this tussock grassland. His assessment concurred with mine, that this was one of the best remnants of a fescue tussock grassland in the Mackenzie, and possibly the South Island. In particular, we wanted to know if we ought to retire it from grazing.

34 His evaluation of the Flats was that there were no obvious factors or qualities that had predisposed this area to healthy tussock land. He concluded that the condition of the tussock grassland at that time was probably a coincidence of timing – good luck, effectively, that it had not yet suffered the same fate as other tussock in the area. He advised that there was nothing we could do to prevent the tussock dying. Notwithstanding his advice, we tried to preserve it by ceasing to graze it.

35 However, within 18 months the tussocks were dying. The combination of dry seasons and insect attack (mainly porina), and competition from hieracium, inflicted on our beloved tussock grassland the same fate that had depleted most other fescue tussock grasslands in the Mackenzie. As Dr Molloy had so correctly predicted, there was nothing we were able to do to prevent it. Our own observations over this time confirmed that this extremely disappointing outcome was the result of natural forces.

36 Early records from the history of the Basin report large areas of tussock dying for no man-induced reason (as early as the late 1800's). This became known as "black tussock disease" and was thought to be caused by the combined effect of drought and insect attack.

37 Tussock is a prolific hard-seeder and, in the early days, rainfall in the following spring was sufficient to ensure an adequate percentage of that hard seed was

struck and the grassland consequently recovered. These days, however, with the rapid ingress of the fiercely competitive weed hieracium, re-establishment of tussock grasslands is not realistic. People suggest that if we simply stop farming, entire areas would return to their former tussock glory. Sadly, this is not true. The Pukaki Flats are a prime example of this. That area has not been grazed for over 10 years now and tussock has continued to decline to the extent that there is now hardly any. Tussock now only occurs on patches of better soils with higher water holding capacity. With the advent of weeds and especially hieracium, competition for moisture is so severe that the tussock seedlings can not compete and grasslands are unable to recover. **Attached** and marked **"D"** is a photo of the Pukaki Flats in 2003, illustrating the devastating effect of hieracium. The tussock cover can be starkly contrasted with that in the earlier 1995 photo.

38 Hieracium is an extremely aggressive weed. It became prolific in the Basin in the 1960's. Hieracium decreases under high fertilizer and pasture sowing but persists at lower fertility. It has therefore been able to be controlled on the better soils that give an economic response to seeding and fertilizer.

39 On both Simons Pass and Simons Hill, hieracium is wide-spread on the lighter soils. In fact, I estimate it to cover approximately 50% of the Pukaki Flats with the balance being bare ground.

40 The difficulties caused by heiracium are: that in the lighter, lower fertility soils, with lower water holding capacity, it outcompetes all other plants for moisture. It does not completely cover the ground and the bare soil areas around the plants increase the water harvesting area of each plant and prevent any grass seedlings re-establishing in this bare ground.

41 Without the addition of reliable moisture through irrigation it is absolutely impossible for any grassland or tussock seedlings to establish and survive.

42 The only seedling I have observed that is able to outcompete hieracium is the wilding pine. If we do nothing the wilding pine will become the dominant species.

Soil Erosion

43 In 1996 Les Basher a scientist from Landcare Research reported use of caesium 137 to estimate soil loss from wind erosion in the Mackenzie Basin. Over a 40 year period the mean soil loss from bare sites was 25mm, from pedestalled sites was 4 mm, and the mean soil loss across all sites was 9mm. This equates to a soil loss of 0.22 mm per year or 2.2 tonnes of soil lost per ha per year. Given the

deterioration of the tussock grassland on Pukaki Flats since 1996, it is likely that this figure is now much greater.

44 This loss is greater than the rate of soil formation or accumulation and accounts for the major loss of soil nutrients. The soil being lost is phosphate rich and that phosphate is ending up in the rivers and lakes. Phosphate is the most expensive nutrient to replace and without it production is not possible. The erosion of this topsoil further reduces the water holding capacity of the soil and makes it increasingly more difficult for dryland grasses to survive and compete for moisture.

45 Given that the total area of this soil type that Simons Hill and Simons Pass jointly propose to irrigate is approx 4,000 ha, I estimate that we would be able to avoid an annual loss of around 8,800 tonnes of soil each year.

Rabbits

46 Rabbits are a problem because they thrive in dry conditions. Mortality is lower, the incidence of disease is lower, and litter survival is higher.

47 When we purchased in 1994 the whole property had been poisoned under the Rabbit and Land Management Programme and rabbit numbers were assessed by Ecan as "low". The rabbit population exploded that first autumn however and in the first 18 months we spent $94,000 dollars, mainly on materials as we did nearly all of the work ourselves. We were loosing the battle, but in the winter of 1995 we got 18 inches of snow that lay around for 6 weeks and we gassed 8,000 active rabbit holes. This reduced rabbit numbers back to post poison levels. By the winter of 1997 we were loosing the battle again and then fortunately RCD (or rabbit calici-virus) arrived. With the introduction of RCD, rabbit numbers were reduced once again to post poison levels of one rabbit per night count kilometre.

48 The current position with rabbit control on Simons Hill and Simons Pass is that RCD is still 65% to 70% effective. This has declined from initial effectiveness of 99%. At this current level of effectiveness, manpower management methods such as day shooting, night shooting, and gassing remain cost effective. However, in many areas of the Basin RCD has reduced in effectiveness to 30% already. I see no reason why we would not follow this trend given that effectiveness has steadily declined since it was originally introduced.

49 Once RCD effectiveness reduces below 50%, manpower methods are increasingly ineffective and poisoning is required. Poison costs vary with infestation levels but a figure of $70 per ha is a reasonable estimate.

Traditionally this area of the Mackenzie was in a 3 year poisoning cycle. Paying $70 per ha every 3 years on 3000 ha of the better soils is not sustainable, but expecting those 3000 ha to fund rabbit control on a further 3000ha (which is not generating any income) is not just unsustainable, it is impossible. These costs also look set to increase as bait costs escalate and aerial application and freight costs respond to increasing fuel costs.

50 Irrigation reduces the area of ideal habitat, and reduces the area of very low or nil stocking rate. Thus we are much more likely to be able to manage rabbit control as the worst area will have been significantly reduced and the income base we have available to service the rabbit control costs will have greatly increased.

Wilding pines

51 The only downside with improved rabbit management is that it has the unfortunate consequence of exacerbating the spread and growth of wilding pine seedlings, which are otherwise controlled by rabbits. **Attached** and marked **"E"** is a photo of the Flats in 2008, showing the growth and spread of wilding pines.

52 At present, we focus our wilding pine control on the better soils because pasture improvement and subdivision enable intensive grazing which provides effective maintenance control and minimises the costs of follow up control. Only trees too large to be grazed down or ring barked by stock need to be cut down, or where numbers of trees are too great, or the density is too great then cutting or root raking is required.

53 The problem with the lighter soils (including those found on the Flats) is that there is no pasture to compete for seedling establishment and no intensive grazing to manage any seedlings that do strike, so the scale of the problem just escalates.

54 The scale of the problem is evident on the Flat. To date, it has not been worth our resources to attempt to manage the wilding pine spread in any comprehensive way. To do so would require an ever increasing level of annual maintenance until there is a fundamental change in the ground cover such as would only be possible with irrigation.

55 As a result of tussock dying, and hieracium invading, there is more bare ground on the Pukaki Flats than ever before to receive the windblown seeds of wilding pines. The problem is further enhanced by the presence of the Mackenzie District Council's 400 acre neighbouring block in the north-east corner that is now almost completely planted in trees. This provides a much increased seed source

right next to an ever more receptive seed bed. This tree block contains most of the species the plan is endeavouring to prevent being planted.

56 The scale of the wilding pine problem is seldom appreciated. The only upside is that once covered in trees it would halt the soil erosion. But that benefit can be achieved by much more sustainable and manageable means and cannot outweigh the detrimental and invasive effects of wilding pine spread.

The need to change

57 In the early 1990's as part of the Rabbit Land Management Programme, grazing trials were set up on Pukaki Flats by Landcare Research and Ag Research. The trials included an area with all grazing excluded, an area with grazing by sheep excluded, and an area free to be grazed by sheep and rabbits. With the rapid ingress of hieracium there was little difference between all plots except that the invasion by weeds was reduced in the grazed areas. Weeds were flat weeds, sweet briar, and wilding pines.

58 After the trial had been running 8 years I asked these scientists to do an evaluation for me of the options for Pukaki Flats. Their view was that without irrigation they could not see any options, and that the ground and soil type was imminently suited to spray irrigation. They did not see dryland pasture as an affordable, or even unaffordable option. The establishment risks were seen as too great and longevity was viewed as highly uncertain.

59 Based on my experience in the farming business, I have unreservedly come to the same conclusion – irrigation is the only solution to the challenges facing the Pukaki Flats. This is a huge undertaking with significant financial risk but without it we will be left with nothing more on the Flats than a grey pile of stones.

60 The scientists advised me to set up a full climate monitoring station to measure rain, wind, solar radiation, air temperature and soil temperature. This was so that they could ultimately model niche crops (such as herb-seed production, pharmaceutical ingredients and flowers) in an attempt to capitalise on our natural resources such as high sunshine hours and low disease incidence, and in order to reduce our reliance on traditional livestock finishing. We now have 8 years of data but before we proceed to the next step of modelling, we wish to obtain greater certainty in respect of our irrigation consents.

61 The notion of irrigating the Basin is far from new. In 1969 when the Government decided to proceed with power development in the Upper Waitaki, it set aside as part of that development, water for irrigation. That Order in Council for 150 million

cubic metres was sufficient to irrigate approximately 25,000 ha of the Upper Waitaki area, of which the Basin comprises a significant part. The agreement recognised that areas imminently suited to irrigation and currently adjacent to rivers were going to be alienated from their source of water. The Pukaki Flats were an area recognised as imminently suitable for irrigation by the Waitaki Catchment Commission. However, its potential source of water was removed when all of the water was taken from the Pukaki River and most of it from the Tekapo River.

62 Not all of the irrigation allocation was taken up immediately. This was due to impediments including: high cost of the necessary infrastructure, land tenure and lack of suitable technology. However with the advent of centre pivot spray technology, the tenure review process allowing for land to be freeholded, and the increasing difficulty of farming without irrigation there has been renewed demand for allocation of water. New processes had to be gone through to obtain that allocation however and we have spent some 8 years fighting to get that 150 million cubic metre figure re-instated.

63 Through the Waitaki Allocation Plan and an agreement with Meridian Energy Limited, the Mackenzie Irrigation Company has secured the right to access 150 million cubic metres of water. There are present consent applications lodged to use some of that water, totalling approximately 16,000 ha of land. We therefore feel that we are finally getting close to achieving something we have been striving for over many years.

64 It is important to note that even if all of the allocation is eventually used for irrigation, the proportion of the Upper Waitaki catchment that could in fact be irrigated is around 3.5%. It does not signal a wholesale change.

65 Aside from making farming in the Basin viable into the future, irrigation will have substantial environmental benefits. It will halt the loss of thousands of tonnes of topsoil and nutrients per year and enable pest control.

66 If we do nothing to adapt our land use practices there will be a major impact on the landscape that will be out of control and over which we can do very little about.

67 If we have a flexible District Plan that encourages people to consider land development options then we have some control over the future state of our landscape.

Irrigation

68 Simons Hill Station Ltd has applied for irrigation consents to irrigate 400ha of currently improved dryland areas, around the homestead area, and behind House Hill in the *true* Simons Pass area. As well, we have applied for consents for 2000ha on the 3000ha of Pukaki Flats that we own. A map showing these areas is **attached** and marked **"F"**.

69 Simons Pass Station Ltd has applied for consent to irrigate 2400 ha of land as shown on the map **attached** and marked **"G"**.

70 In combination, the two Stations propose to irrigation 4800ha. This is a large area but it is necessary to achieve economies of scale. The cost of the consent process, design and planning, and the building of the off-farm structures and delivery system are so great that we need a large area to spread these costs over.

71 Additionally, if we only tackle a small area then we are not addressing in any significant way the issues of soil loss, hieracium, wilding tree spread and rabbit control. Because this project is beyond the resources of a family farming business we need scale to attract and service outside funding.

Implications of Plan Change 13

72 I understand that Plan Change 13 does not propose to regulate farming in the sense that intensive farming remains permitted as does the use of irrigation structures.

73 However, I do understand that the Council is proposing to issue guidelines in an attempt to influence the location of farm structures such as irrigators in order to preserve views from roads. We have not seen any guidelines and I have no idea of what they might say or how practical they might be. I see potential difficulties arising if adequate consultation with farmers is not carried out and would strongly urge the Council to enter into full and meaningful consultation before any reference to these guidelines is included in the Plan.

74 My understanding of the fundamental aspects of Plan Change 13 is:

i. There is no longer a right to establish any dwellings without obtaining resource consent;

ii. Farm buildings are only permitted if they are within a "node", most of which need to be created by resource consent application;

iii. Nodes are extremely unlikely to be approved unless they are within the areas selected by the Council and also conform with the total number of nodes allocated to any one area.

75 As a result of the above, the Plan Change gives us considerable cause for concern. Primarily, we are worried that we no longer have flexibility or certainty in respect of building rights. Such building rights are essential to our future plans and our ability to make a living from our land. By constraining our building rights so significantly the Council is, in effect, constraining the productive potential of our land. We are also concerned at the costs that may be involved in obtaining permission from the Council for buildings.

76 In order to realise the productive potential of the land and the benefits of irrigation and adaptive land use, we need a District Plan that is enabling. In particular, we need to be able to provide accommodation for farm workers and a number and variety of farm buildings. For example, an irrigated farming operation the size of the Pukaki Flats will need numerous houses and farm buildings but until we see our consent conditions and settle on the mix and types of business's we are likely to run it is difficult to put a number on the housing or farm building requirements.

77 In my view, the level of control proposed in Plan Change 13 is highly restrictive and unnecessary. I have seen no pressure within the farming areas of the Basin for lifestyle subdivision and I suggest that the costs of creating subdivisions in most of the Basin would be prohibitive in any event. This is a working rural area. Nothing that has happened in the 14 years I have been here suggests to me there is immediate or even non-immediate danger of it being carved up into small lifestyle blocks.

78 In addition, I consider that the "potential nodes" allocated to Simons Hill and Simons Pass Stations are entirely inappropriate for workers accommodation or farm buildings and likely to be completely inappropriate for pure residential use also.

Inappropriateness of indicated nodes

79 There are two landscape sub-areas on Simons Hill where it is indicated that the potential for creating new building nodes exists.

80 The first area includes the existing homestead node and encompasses most of the bettter soils that we have currently developed. Much of this area is behind House Hill and away from the road and other public viewing areas and as such

the node concept is entirely inappropriate. The figure of 3 is arbitrary and nonsensical.

81 The second area is on the periphery of Pukaki Flat. Allowing building nodes in areas where no one would ever wish to build is a very unhelpful concession. The suggestion that 4 building nodes could be allocated to the Tekapo and Pukaki riverbeds is unhelpful in the extreme. It is as far away from the road and all services as it is possible to get, not central to the intended farming operations, and not a pleasant place to live because it is tucked away in an old river bed, shaded and lacks the vista that makes living in the Mackenzie such an attraction. I cannot see the sense in allocating nodes to this area but if there were sense in it, I cannot see why they should be limited to four given how "hidden" the area is.

82 The existing homestead node for Simons Hill is very small with no room for further house sites and maybe only the addition of an implement shed or haybarn. The total area is 6.6ha, of which 1.5ha is sheep yards, 2.6ha are trees, and 0.6 ha is the existing house and grounds. In addition there is roading, a workshop, a storage shed and cattle yards. To suggest that further residential building is appropriate within this confined area is madness. We work with our employees or family all day. We need some privacy and space. We live in the Mackenzie because we love privacy and space. Trying to herd us into a confined space like this is unreasonable and unworkable.

83 Last December we completed a second homestead and in the current plan it sits outside of the existing node. We request that if the plan proceeds that either a new existing node is created, or the current existing node is expanded to incorporate this house and the ground around it. It appears from the maps that this house has been built in an area of "high visual vulnerability" and "high vulnerability to development". We believe that by utilising natural land forms and using natural materials that we have integrated this house into the landscape. Photos are **attached** and marked **"H", "I"** and **"J"**. They respectively show: the house from the 90km corner as approaching from Tekapo; the house from SH8, immediately in front of the house; and a close-up of the house. This dwelling was designed without being subject to any controls other than colour.

84 There is one existing "node" on Simons Pass which, as I have outlined previously, contains the homestead and almost all of the farm implement buildings.

85 The Simons Pass Station has also been allocated additional building nodes within the Pukaki River bed (the lowest Pukaki River terrace). This is one of the most impractical and unusable areas of the Station that would be utilised for

future farm dwellings and farm implement buildings. Apart from being within an area that is subject to an existing Meridian discharge consent for large water discharges (>3,000 m^3/s) from the Pukaki Dam, the area is also within the potential dam break area from the dam, difficult to provide services to the area, and would also not have sufficient amenity to attract and retain farm employees.

86 The other location of a building node for Simons Pass is within the Pukaki terminal moraine. While this area has been selected by the Council because it cannot be seen by tourists on the State Highway, it is not a location that would necessarily be chosen to construct dwellings and associated buildings. The location is the most distant from the (to be irrigated) Pukaki Flats and therefore, regardless of the inherent disadvantages of the selected node itself, would be very unlikely to be utilised at all because of practical considerations.

87 It appears that the location of the nodes have been selected on the basis of solely landscape issues alone with no regard to the other practical issues that landowners consider when selecting locations for dwellings or farm implement buildings.

88 Both Stations are intending to irrigate the Pukaki Flats and require the practical flexibility to position future dwellings and farm buildings in locations based on sound business decisions.

Pukaki Flats

89 The Pukaki Flats are classed as "high visual vulnerability", with "high vulnerability to development". I dispute this. These flats are undulating with small terraces and depressions that could be enhanced to minimise the impact of buildings. It is the overall vastness of these flats and the hills behind that are exceptional and not the detail of the foreground. The foreground already contains a pylon line, a power canal, two power stations and a man made lake.

90 Taking heed of these characteristics and minimising the effect on the landscape will require local knowledge, flair and experience. Being bound by a desk top exercise denies this local expertise the chance to express itself and does not guarantee a superior outcome.

91 Our irrigation and overall farm plans cannot be completed until we know whether we get the water we have applied for and on what terms. However, we do know that any adaptation of farming practices is going to involve utilising the currently unproductive Pukaki Flats. This in turn will inevitably entail workers' dwellings and farm buildings on the Flats. We need a reasonable opportunity to establish

these buildings. If we cannot establish buildings in the necessary locations it may adversely affect the efficiency of the operation, or add such extra costs and uncertainty so as to threaten the viability of the development. The planning and consent hurdles that we are being put through are already threatening the viability of our development.

Farm Buildings

92 Farm buildings need to be practical, functional, and efficiently placed. There is limited scope to change the location or design of these buildings before such changes start to impact on their cost-effectiveness and efficiency. We need to know that (within reasonable parameters) we can put up the type of farm building we need in the place it is most needed. The Proposed Plan Change does not give us that certainty which is astounding to me when I consider that farming is the life-blood of the Mackenzie Basin.

Conclusion

93 The Mackenzie Basin has and continues to change significantly over time in response to the natural challenges and processes that confront it.

94 Present farming practices are not sustainable. Large tracts of potentially productive land are sitting idle, overcome by hieracium and soil erosion.

95 As was recognised almost 40 years ago, the Basin comprises areas of land that are extremely well suited to irrigation. Over many years we have fought to obtain an allocation of water that would enable irrigation of approximately 25,000Ha in the Upper Waitaki. We finally have that allocation and are now seeking the necessary permits from the Regional Council.

96 Irrigation will not only enable us to continue farming in a viable way, but will also provide a solution to the many problems we need to address. To enable the efficient and sustainable development of farming operations, we need flexibility and certainty in respect of farm dwellings and farm buildings. We consider that Proposed Plan Change 13 has the potential to impact significantly and adversely on our ability to develop efficient and economic farming units.

Denis Fastier

11 September 2008

A

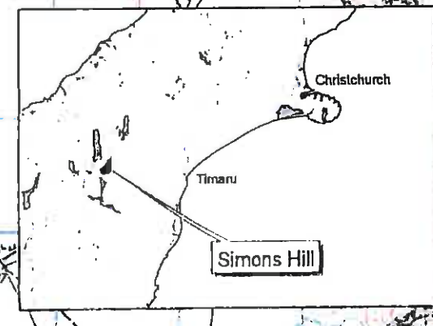
Simons Hill
Topo / Cadastral

Simons Hill

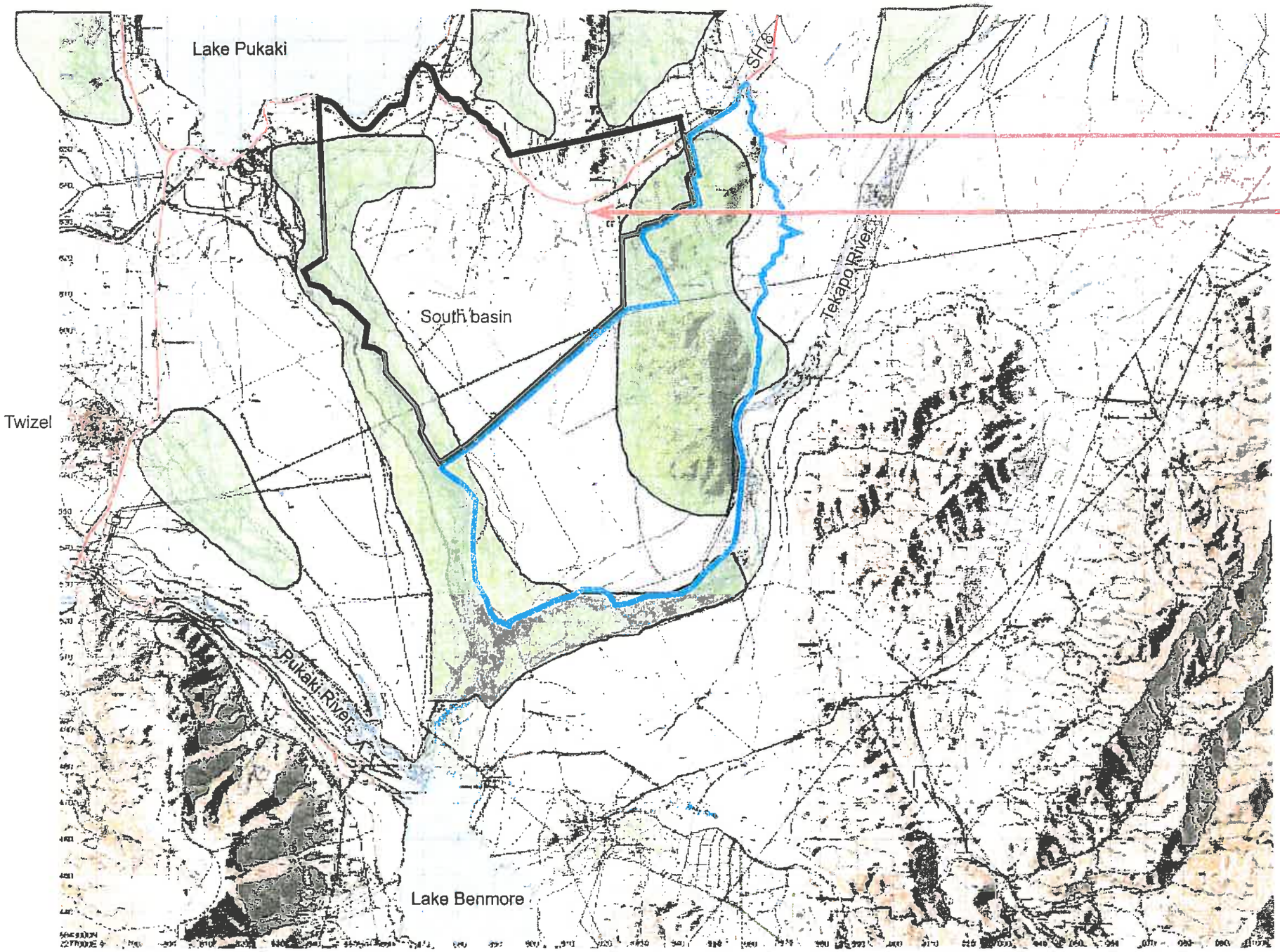
0 0.5 1 1.5 2 Kilometers

N

Map prepared: 10 August 2000
Topographical map sheets 1:50,000 NZMS 260 I38, I39, H38, I39

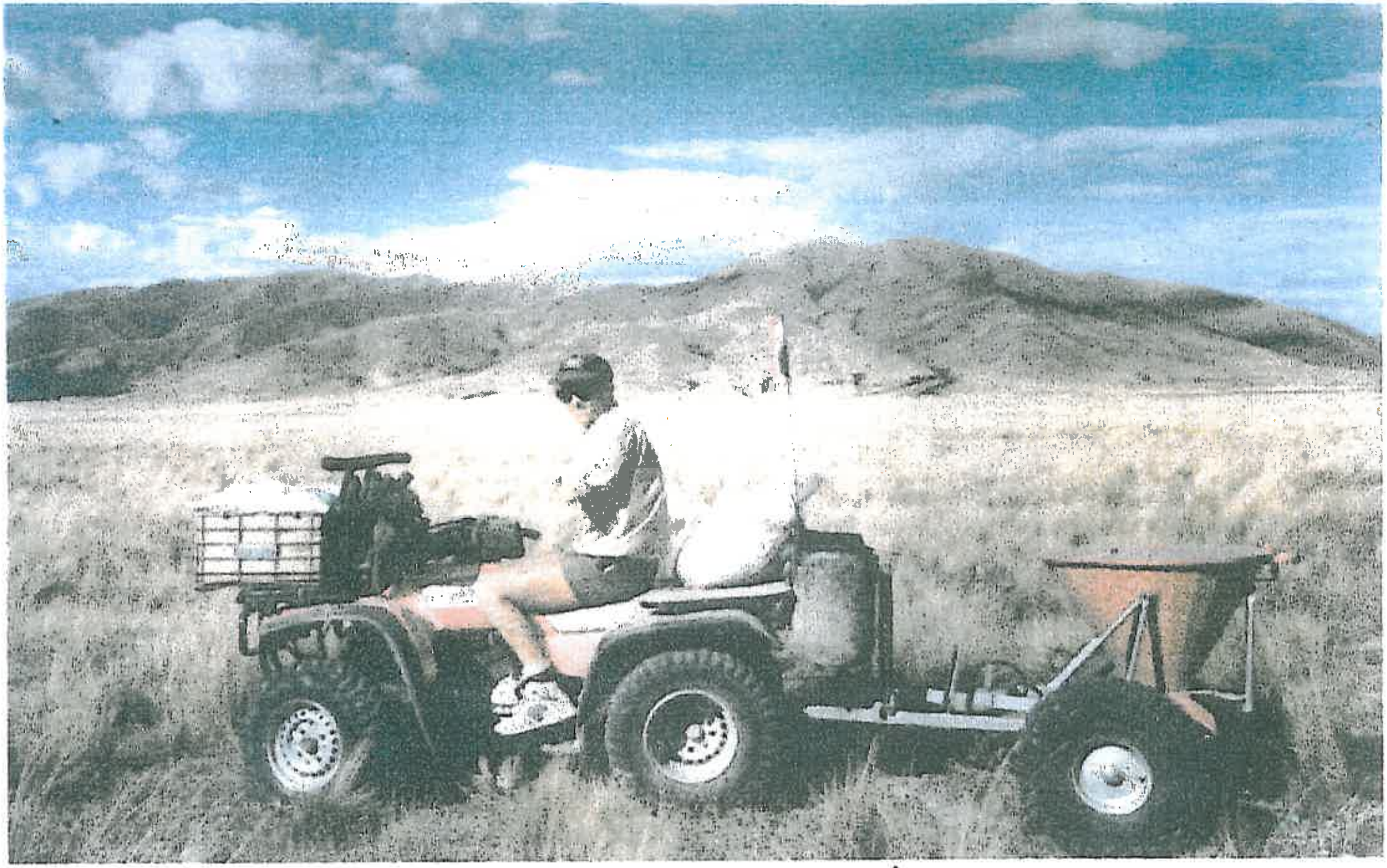


" B"



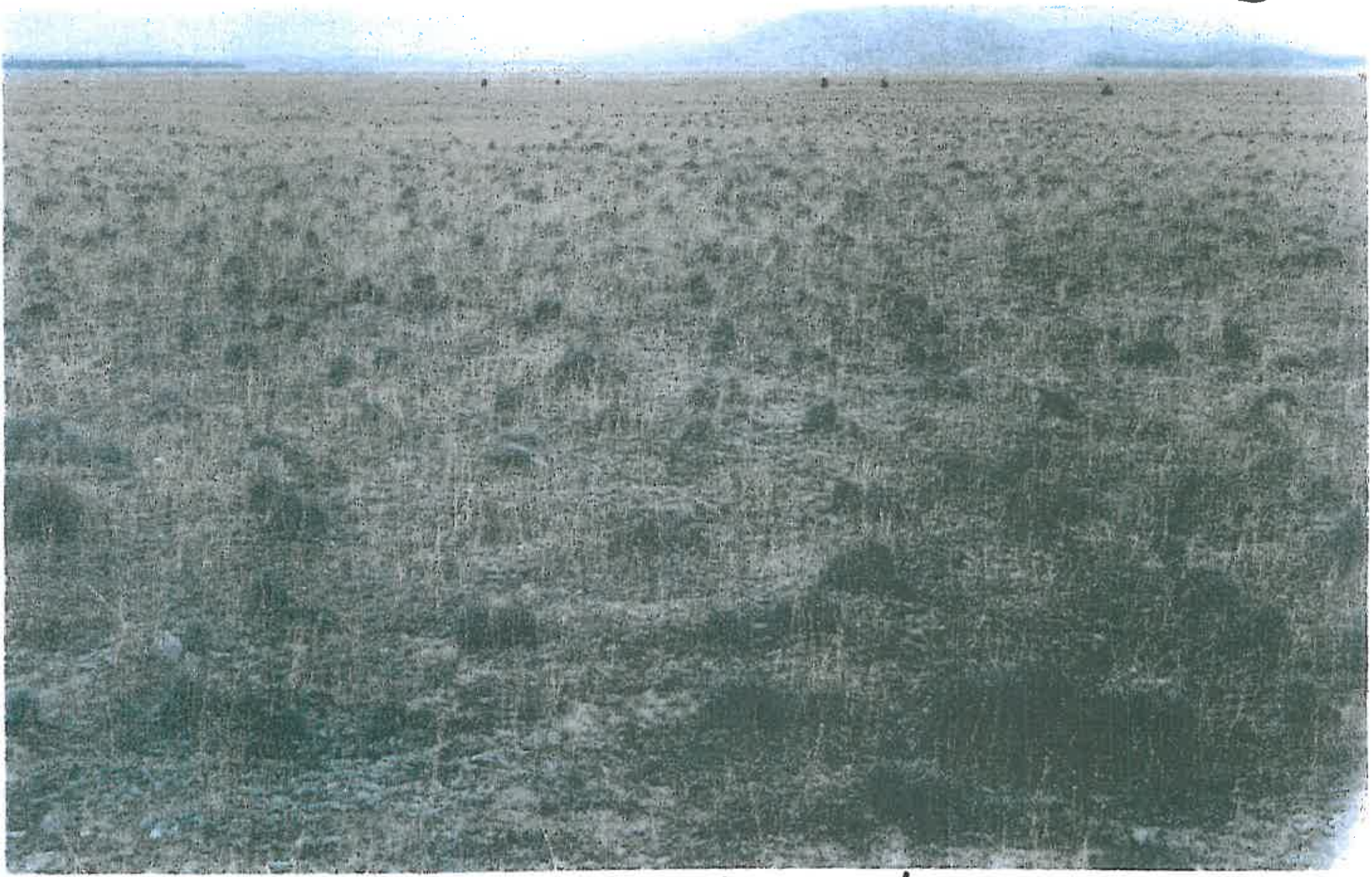
Refers to an interpretation of the Councils development nodes on Simons Pass and Simons Hill Stations

"C"



Pukaki Flat 1995

"D"

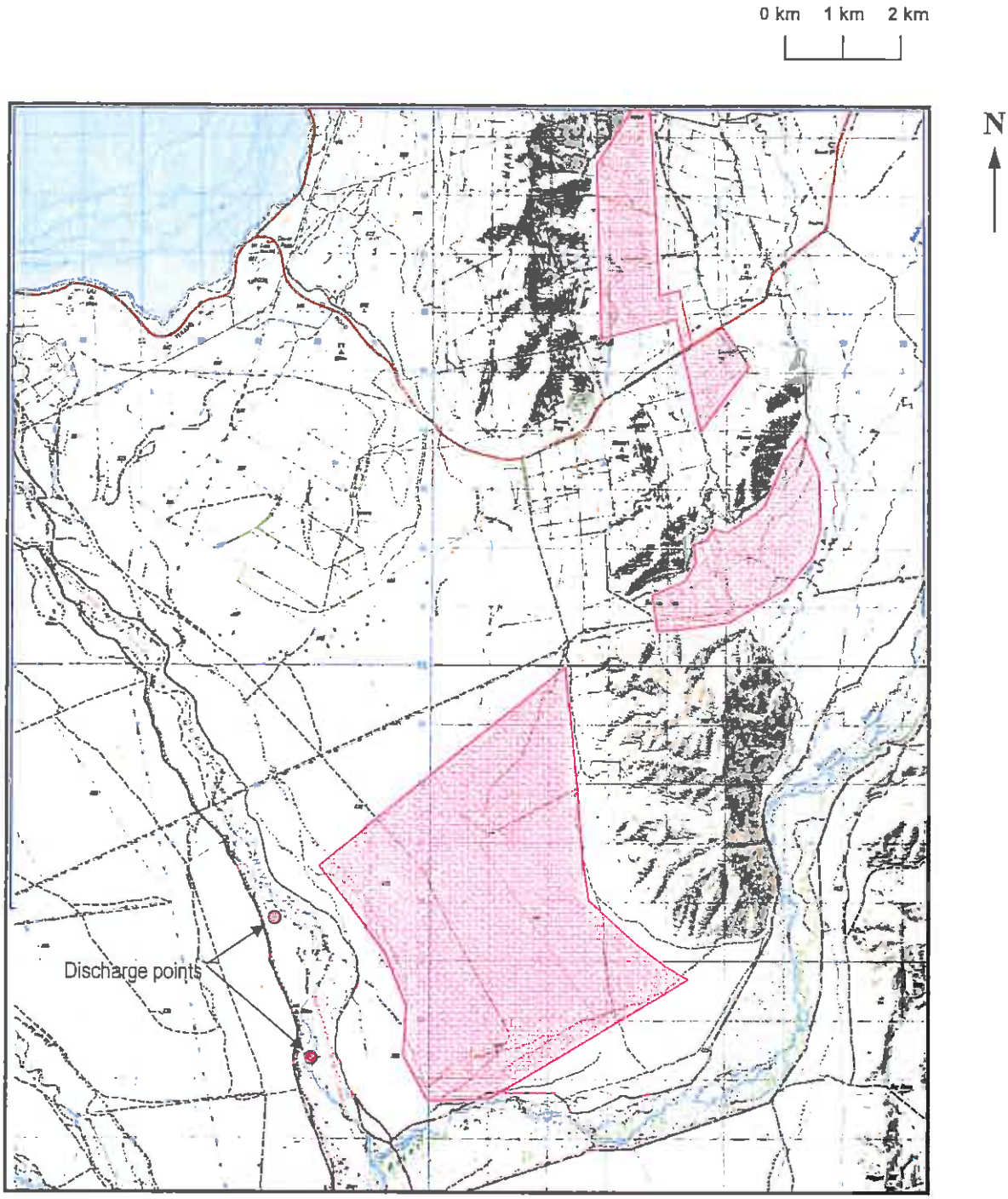


Pukaki Flat 2003

Pukaki Flat 2008

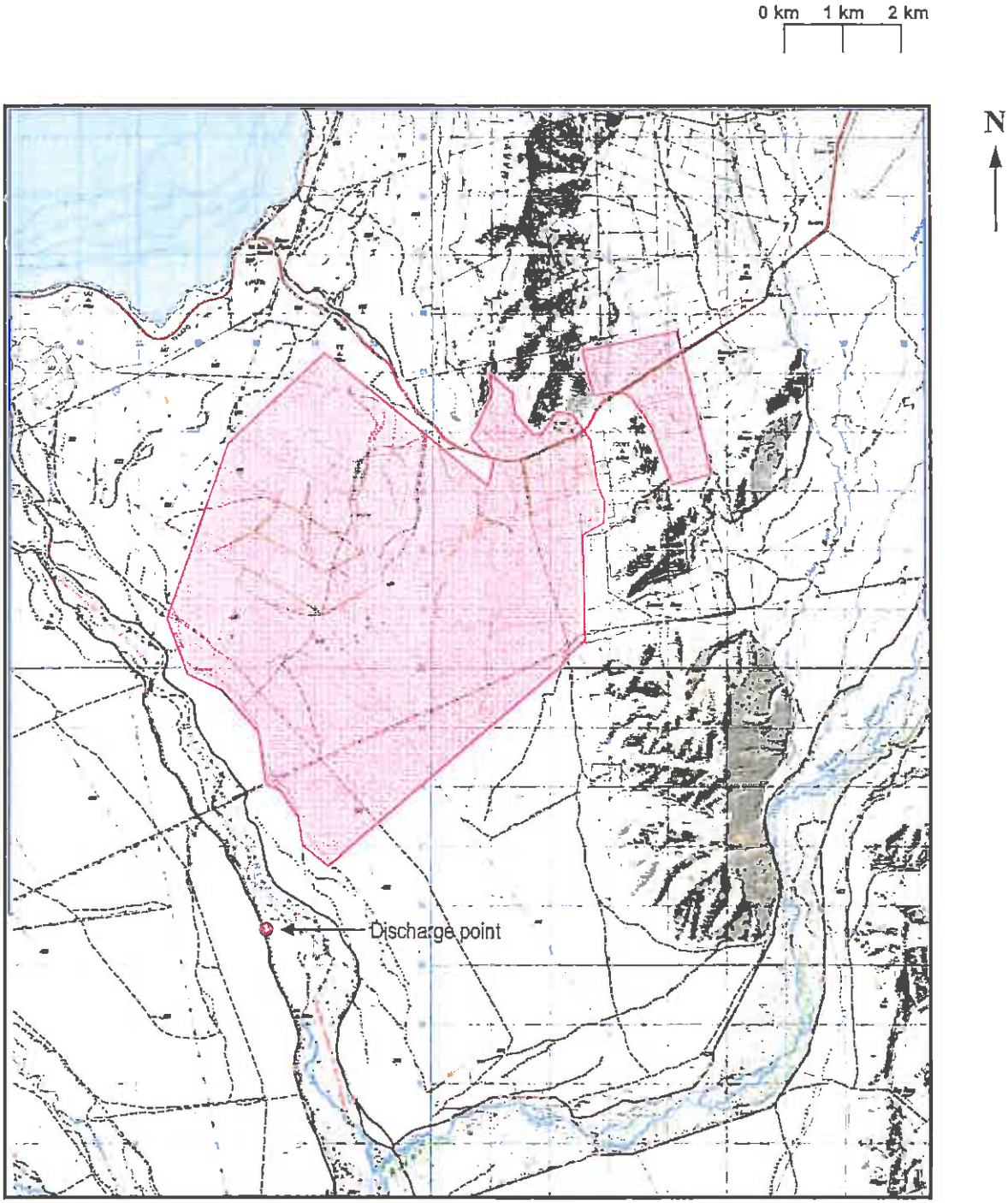
F

Appendix A: Proposed land area to be irrigated



"G"

Appendix A: Proposed land area to be irrigated




'H'


"I"


"J"