

Crown Pastoral Land Tenure Review

Lease name: CASTLE DENT

Lease number: PO 196

Preliminary Report on Public Submissions - Part 1

This document includes information on the public submissions received in response to an advertisement for submissions on the Preliminary Proposal. The report identifies if each issue raised is allowed or disallowed pursuant to the CPLA. If allowed the issue will be subject to further consultation with Department of Conservation, or other relevant party.

The report attached is released under the Official Information Act 1982.

May

06

Report in Accordance with Contract 50346

Preliminary Analysis of Public Submissions for Preliminary Proposal

File Ref:CON/50000/16/12494/00/A-ZNO **Submission No:** QVV 737 **SubmissionDate:**18/10/2005

Office of Agent: Christchurch

LINZ Case No:

Date sent to LINZ: 15/11/2005

RECOMMENDATIONS

- (1) That the Commissioner of Crown Lands approves this report for tenure review of Po 196 Castle Dent Pastoral Lease.

Signed by Contractor:

Barry Dench
Team Leader for Tenure Review

Carolyn Latham
Tenure Review Consultant

Approved/Declined by:

Name:
Date of decision: / /

(1) Details of lease:

Lease Name: Castle Dent
Location: State Highway 8, Bowlers Creek, Lawrence
Lessee: Castle Dent Limited

(2) Public notice of preliminary proposal:

Date, publication and location advertised:

6th August 2005

- The Press Christchurch
- Otago Daily Times Dunedin

Closing date for submissions:

3rd October 2005

(3) Details of submissions received:

A total of eleven submissions were received, along with a letter from a regular submitter who decline to comment on the proposal.

(4) Analysis of submission:

4.1 Introduction:

Explanation of Analysis:

This is a preliminary analysis of submissions. The purpose of this preliminary analysis is to identify those issues raised which are appropriate for further consideration.

After such further consideration and appropriate consultation, a final analysis of submissions will be completed which will record the outcome of such consideration on each point and whether or not it has been approved for inclusion in the draft Substantive Proposal.

Each of the submissions received has been reviewed in order to identify the points raised and these have been numbered accordingly. Where submitters have made similar points, these have been given the same number.

The following analysis:

- Summarises each of the points raised along with the submission number of those submitters making that point.
- Provides a discussion of the point.
- Discusses the CCL decisions whether or not to allow/not allow for further consultation.

The decision to “**allow**” the point made by submitters is on the basis that the matter raised is a matter than can be dealt with under the Crown Pastoral Land Act 1998. Conversely, where the matter raised is not a matter that can be dealt with under the Crown Pastoral Land Act, the decision is to “**not allow**”. Those points that are ‘allowed’ will be given further consideration with respect to the proposal.

It should be noted that points relating to the Conservation Act, or any other statutory authority outside of the Crown Pastoral Land Act 1998 are not able to be considered by the Commissioner of Crown Lands.

4.2 Analysis:

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
1	Endorses CA1, CA2, CA3 and R1(Scenic).	Nos 1, 3, 4, 7, 9, 10, 11 and 12	Allow

There was wide support from eight of the submitters for the proposed conservation and reserve areas.

Submitter 1 states “*The three proposed conservation areas and the scenic reserve are all endorsed*”, in particular “*the retention of the hut near the yards, and the new fencing of CA2 to make it stock proof*”.

Submitter 3 “*strongly supports this change to public land for its hunting and other outdoor recreational values.*”

Submitter 4 echoes the above and adds that “*CA2 will be a very desirable addition to the Te Papanui Conservation Park.*”

Submitter 7 basically agrees with the proposal stating “*we support the creation of Conservation land as proposed*”, but also points out “*it does not totally stand alone as it is an integral part of a wider area.*”

Submitter 9 sees it as a very good proposal, in particular because “*it will add a valuable area of tussock land to Te Papanui; the water races have considerable historic value; and it makes a very valuable addition to conservation and the public being so handy to SH8.*”

Submitter 10 *“is largely supportive of the proposals”* and is *“pleased to note the proposed allocation of land”*.

Submitter 11 supports *“the designation of about 2397 ha in total as land to be restored to Crown control as conservation areas for scenic reserve”*.

Submitter 12 supports the proposals, and in particular the *“retention of the station hut within CA1 as an emergency and overnight shelter”*.

As the retention of land in Crown ownership and for freehold disposal plus making easier the securing of public access to and enjoyment of reviewable land are objectives of the Crown Pastoral Land Act 1998 the point should be allowed so that these views can be taken into account in further consideration of the proposed designations.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
2	Support for the proposed easements and suggestions for different options and designations.	Nos. 1, 3, 4, 6, 7,8, 9, 10, 11, 12	Allow in part

Ten submissions were received, generally in support of the proposed easements, including the water conveyance easement, but expressing concerns about particular aspects. These have been categorised as follows:

1. Public access easement in gross, section “m-n”

Submitter 1 supports this section of the easement subject to access to it being provided across existing freehold land from SH8 and emphasises *“This is essential, and must be assumed to be based on an existing agreement with the property owner, as stated in the preliminary proposal.”*

Submitter 9 believes this part of the route appears to be adequate but notes *“the public access and creek area needs to be protected from cattle.”* They go on to state that *“Secure parking on, and access from SH8, will have to be obtained for all time to point ‘m’.”*

Submitter 12 comments that *“at present the indeterminate track through an awkwardly placed gate and across a paddock to Bowlers Creek is unsatisfactory as access to this pleasant valley.”*

2. Suggestion for alternative route to “a-b” and support for public access on route “v-w”

Submission 9 queried the desirability of having access passing through the sheep yards of Castle Dent and so close to the homestead and suggested that when a practicable and a suitable parking area has been secured for route “m-n”, another route be chosen up the spur leading to point “b” on the main ridge. This submission appears to be mistaken in thinking that “a-b” is for public access whereas it exists only for Minister of Conservation management purposes.

Submitter 12 notes public access on route “v-w” from Youngs Road to Gardeners Road and Medwin Road seems adequate. This appears to be based on the belief that this route through “CA2” is for public access, rather than as a concession for farm management purposes. Public access would be allowed as of right through CA2 although the entry point is at the northeast side.

As the submissions appear to be based on a mistaken belief this point is “Not Allow”.

3 Access for hunters accompanied by dogs

Submitters 3 and 4 ask that the proposal “*ensures that hunters with dogs can use all the accesses to this block.*”

4. Provision of public vehicle access

Submitter 3 believes “*if recreational hunters are to do their bit for sustainable management on CA1, it would be highly desirable for them to have vehicle access to the top section of it to allow taking out shot animals for the table.*”

Submitter 6 notes that “*for a significant section of the community the only practical way to access, experience and enjoy the great New Zealand outdoors is by vehicle.*” Therefore they request that “*Managed access by both horse and motorised vehicle be managed in some way, however, permission for access should not be unreasonably withheld when requested over all tracks, paths and roadways in both proposed conservation and freehold areas (including the areas covered by conservation covenants), and permission for access should not be unreasonably withheld when requested.*”

Submitter 7 holds a very strong view that there is little point to creating conservation lands if people cannot freely access or enjoy them. They propose a new easement “a-b-c-d-e-f” allowing for the passage of persons and public on foot, horse, motorised and non motorised vehicles at any time. Alternatively they suggest “*establishing legal road existence, as an alternative to the easement provisions, could*

simply be the realignment and or surveying of the road.” They believe that “this route of Young & Medwin Roads is a key element to the overall plans for this and other areas.”

Submitter 7 makes a further point that *“not all people are capable or able to walk or mountain bike and the benefit of 4WD access is that it also creates opportunities for these people to recreate and enjoy the area as much as their able bodied counterparts. We stress that areas like this have the huge potential to allow enjoyment to all.”*

Submitter 8 is concerned that *“there is no provision for public vehicle access or travel in the proposals for the areas being designated. They feel that “The process of the Pastoral Lease reviews is shifting management of many of the backcountry routes, or sections of them, to the Department of Conservation along with a policy of no public vehicles on these lands.” They submit that “Any plan for the Castle Dent lands must include provision for maintaining existing vehicle routes and make allowance for future possible use by vehicles, including private vehicles.”*

5. Support for proposed easements in their current form

Submitter 10 is pleased to note that *“appropriate provisions for access are proposed.”*

Submitter 11 supports the proposed easements as put forward in the Preliminary Proposal.

6. Support for “right to convey water” “q-r-s-t”

Submitter 9 notes support for the continuation in force of the ‘right to convey water’ granted to Trust Power Generation Ltd.

As the retention of land in Crown ownership and for freehold disposal plus to make easier the securing of public access to and enjoyment of reviewable land are objectives of the Crown Pastoral Land Act 1998 the point should be allowed in part so that these views can be taken into account in further consideration of the proposed designations.

In addition as the Crown Pastoral Land Act provides for the continuation in force of an existing easement under section 36(3)(c) the point supporting the Trust Power Generation Ltd easement should be allowed so this view can be taken into account in the further consideration of the proposed designation.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
3	Proposals for additional conditions on Run Block.	Nos. 1, 9, 10, 11, and 12.	Allow

Five submissions were received on the proposed freehold Run Block adjacent to CA1. Whilst there were no objections to it being freeholded and used for grazing, the general consensus was that there are important landscape values on this block that deserve additional protection from certain farm management practices in the future.

Submitter 1 suggests *“a covenant protecting it from future afforestation as well as from future management burning is highly desirable (given the tussock grassland dominance of the proposed CA1 area downwind of this area and its vulnerability to wilding tree invasion as well as out-of-control fires).”*

Submitter 9 disagrees with the preliminary proposal description that the area has little inherent conservation values. They believe that *“this area will form a visual landscape ‘buffer’ between the softer tussock covered land above (CA1) and that land below now planted in darker coloured Douglas Firs in private ownership. To further improve this visual corridor we believe the fence alongside the road (within CA1) should be shifted further into the block itself.”* In addition they propose *“To facilitate this visual transition, a landscape covenant will be required to retain the area in as near as possible its present, although modified state. The covenant should be so designed to prevent burning, ploughing, earth works, tree planting, oversowing and topdressing, or any other activity which would remove or further degrade the tussock cover and woody indigenous vegetation.”*

Submitter 10 sees merit in *“establishing a landscape protection covenant on the Run Block , primarily to prevent burning and exotic afforestation which would significantly impact on the recreation experience obtained from within CA1, as well as introducing serious risks of spread of wilding pines and fire into CA1 and thus affect its significant inherent values.”*

Submitter 11 advocates for *“an additional covenant to prevent the establishment of exotic forestry in the northern block of the land to be freeholded.”*

Submitter 12 suggests *“burning, ploughing and conifer planting should not be permitted in perpetuity. The preservation of this area as largely open country is desirable as a buffer for the landscape transition from the rolling tussockland of CA1 to the plantations on the Run Block’s southern boundary.”*

As one of the objects of the Crown Pastoral Land Act is to (b) enable the protection of the significant values of reviewable land –

- (i) By the creation of protective mechanisms,

and as these submissions promote these objectives this point should be “Allowed” for further consultation and consideration.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
4	Extending the upper boundary of CA2 to Young Road.	No. 1	Allow

Submitter 1 proposed that *“The upper boundary of CA2 should desirably be along the legal (Young) road which would provide ready public access to the conservation area as well as access for future management of the Castle Dent freehold property, a preferable alternative to the proposed farm management easement concession ‘v-w’.”* The submitter goes on to add *“ the ecological importance of this shrubland (in CA2) is enhanced by the presence of two relatively rare species, the daisy shrub and ground orchid”*

As the retention of land in Crown ownership and for freehold disposal plus the securing of public access to and enjoyment of reviewable land are objectives of the Crown Pastoral Land Act 1998 the point should be allowed so that these views can be taken into account in further consideration of the proposed designations.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
5	Extending CA3 to link with CA2.	No.1 1	Allow

Submitter 1 supports retention of area “CA3” as conservation area mainly because it adjoins the marginal strip and has been largely fenced from stock however proposes that *“Desirably CA3 should be extended the few hundred metres downstream to link with the proposed CA2 if practicable.”*

As the retention of land in Crown ownership plus the securing of public access to and enjoyment of reviewable land are objectives of the Crown Pastoral Land Act 1998 the point should be allowed so that these views can be taken into account in further consideration of the proposed designations.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
6	Extending R1(Scenic)	No.s 1 and 9	Allow

Two submissions were received proposing boundary changes to R1(Scenic).

Submitter 1 notes that the new fencing required to exclude stock from R1(Scenic) is significant due to the highly irregular nature of the proposed boundary. They suggest that *“removal of the c. 45 ha enclave of proposed freehold land where the legal road runs through is recommended, so as to: a) provide greater scope for natural forest succession b) improve the configuration of the proposed reserve, and c) reduce the installation and maintenance cost of the boundary fence.”*

Submitter 9 advocates moving proposed fence line “A-B” and existing fence between “B-C” be shifted to include two additional gullies and “observes that *“there is also significant potential for a regenerating forest in the bottom ends of the two gullies further to the south which should be included. This would give the southern arm of the ‘U’ more substance”*. The map enclosed with this submission also shows proposed extensions to both ends of the ‘U’ in a north easterly direction, encompassing some additional gullies which extend up to the proposed public access easement “d-e-f” and reduce the length of “d-g”.

As the protection of significant inherent values of reviewable land – (i) by the creation of protective mechanisms; or (preferably) (ii) by the restoration of land to full Crown ownership and control are objectives of the Crown Pastoral Land Act 1998 the point should be allowed so that these views can be taken into account in further consideration of the proposed designations.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
7	Fencing required around CC1	No.s 1, 9, 10 and 12	Allow

Four submissions were in support of fencing the proposed Conservation covenant CC1 to allow natural successional processes to take place.

Submitter 1 believes *“this shrubland potentially could develop over time into a stand of silver beech forest, it clearly would be desirable to exclude stock (other than sheep and / or cattle) otherwise the natural successional processes will be seriously affected..”*

Submitter 9 endorses the covenant and but notes a concern regarding possible threats to maintaining the values from sheep and cattle grazing. The submission acknowledges fencing the area would be an expensive exercise but believes that *“Unless this covenant is strictly adhered to in every respect, fencing is the only answer. We cannot see that there is much grazing value in this area unless stock are forced to graze it; which would be detrimental to the values.”*

This statement is made with reference to the covenant document, Schedule 3, clause 4, last paragraph, which specifies the requirement for the Owner of the said Land to fence the covenant at their expense if stock management practices are reasonably deemed by the Minister to be still having an adverse affect on the Land’s values.

Submitter 10 considers that *“The absence of a requirement to fence CCI means the value of the covenant will be seriously limited. If preventing grazing will mean that this block has no value as freehold, then it should become part of CA2.”*

Submitter 12 suggests that *“some consideration be given to fencing of this area to help preserve the ecological potential.”*

One of the objectives of the Crown Pastoral Land Act is to (b) enable the protection of the significant inherent values of reviewable land –

- (i) By the creation of protective mechanisms; or (preferably)
- (ii) By the restoration of the land concerned to full Crown ownership and control

As these submissions promote these objectives this point should be “Allowed” for further consultation and consideration.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
8	Provision for future mineral exploration access.	No. 2	Disallow

Submitter 2 has concerns about the ability of exploration or mining permit holders to secure a workable access agreement once land is transferred to the Department of Conservation.

The submitter has requested *“ that the Commissioner of Crown Lands takes notice of the mineral potential of the area of current interest when finalising the substantive proposal for Castle Dent tenure review” and goes on to suggest that consideration should be given to the merits of some form of transitional provisions to ensure that future explorers and developers have a right of access to land on reasonable terms for the purpose of carrying out exploration and mining activities, and also any exploration and mining activities under subsequent*

permits granted in accordance with section 32 of the Crown Minerals Act 1991”.

The submission concedes that the transfer of land to the Department of Conservation does not generally preclude access to the land for purposes of prospecting, exploration and mining. Central to the submitter’s contention is a concern that once land came under Department of Conservation administration for conservation purposes, it would become much more difficult to gain the necessary access permits for mining. The Crown Minerals Act 1991 allows for the application for mining over any Crown land including conservation land.

Notwithstanding that section 35 has provision for land to be held under future Department of Conservation administration or another Crown purpose this should make little difference in the way that a case for granting access for mining purposes would be considered.

If parts of the pastoral lease was restored to or retained by the Crown in order to meet the objects of protection of the significant inherent values, administration of the land including processing of any application for mining purposes would need to be carried out in an even and dispassionate way. Further to that the Crown Minerals Act provides a mechanism for the consideration of mining applications. After consideration of the point and of the provisions available for tenure review under the Crown Pastoral Land Act it appears that the Point can not stand and therefore is disallowed.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
9	Fencing required around CA3 and Young’s wetland.	No.s 9 and 12	Allow

Two submissions were received in support of fencing off CA3 and Young’s wetland.

Submitter 9 believes *“To give adequate protection to this marginal strip we believe this should be fenced off if possible”*. They go on to say *“So too should the Young wetlands be fenced off. While they may be somewhat degraded at present, they will recover if protected.”* The map accompanying this submission also shows three areas feeding into the wetland which are proposed by the submitter to be fenced off from grazing to maintain long term woody cover.

Submitter 12 adds *“We note that the wetland in Youngs Valley is not protected in any way and suggest that fencing it to exclude stock would be desirable to allow its recovery to a wetland typical of the area and ideally to protect it by covenant.”*

Two of the objectives of the Crown Pastoral Land Act are (a) To (i) promote the management of land in a way that is ecologically sustainable and (b) To enable the protection of the significant inherent values of reviewable land –

- (iii) By the creation of protective mechanisms; or (preferably)
- (iv) By the restoration of the land concerned to full Crown ownership and control

As these submissions advance a means to promote the management of land in an ecologically sustainable way and also to achieve the protection of significant inherent values this point should be “Allowed” for further consultation and consideration.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
10	Support for farm management easement concession “o-p” & “v-w”	No. 1 & 9	Allow

Submitter 1 notes support for farm management access for “o-p” across part of “CA1” while submitter 9 supports provision of access “o-p” and “v-w”.

As the creation of an easement concession is provided for under the Crown Pastoral Land Act the point should be allowed so these views can be taken into account in further consideration of the proposed designation.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
11	The legal road through Run Block should be re-surveyed onto the formation where it deviates.	No. 9	Disallow

Submitter 9 makes the suggestion that *“The legal road running through the back block where it does not coincide with the present formation should be re-surveyed onto the formation.”*

Re-surveying a legal road would involve the local authority and would take the process outside the ambit of the Crown Pastoral Lands Act. There is no provision in the Act for the creation or surveying of roads.

As the submitter has proposed actions which are not achievable within the Crown Pastoral land Act 1998 this point is disallowed for further consideration within this tenure review.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
12	Notes legal road access still available to CA1 via Munro Gully and Gardiners Track.	No. 9	Allow

Submitter 9 makes the observation that access to CA1 is also available via an alternative route on existing legal roads to the east of Castle Dent.

As the retention of land in Crown ownership and for freehold disposal plus the securing of public access to and enjoyment of reviewable land are objectives of the Crown Pastoral Land Act 1998 the point should be allowed so that these views can be taken into account in further consideration of the proposed designations.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>
13	To investigate legal means of preventing risk of fire spread into the area.	No. 12	Disallow

Submitter 12 has concerns about the potential for fire to spread onto CA1, particularly from the west. They note *“There had been a big burn on Beaumont Station just prior to our visit which had crossed the river and burnt a small strip on the Castle Dent side. We suggest that some thought should be given to some legal way to prevent this happening in the future.”*

The point relates to future management of the land subsequent to the conclusion of the review but not to considerations that need be taken into account for tenure review. This submission deals with the situation coming under the Local District Council’s fire management strategy.

It is therefore outside of the provisions of the Crown Pastoral Land Act and is disallowed.

Discussion and conclusions:

Discussion relevant to each point has been made under each listed point for simplicity and clarity.

The submissions that come under the jurisdiction of the Crown Pastoral Land Act fall into several main themes:

- Greater control over the management of the proposed covenanted area CC1.
- General support for the proposed easements subject to confirmation of parking on State Highway 8 and access to the start of the public access easement, and consideration of alternative routes, although one submitter appeared to mistake one of the routes for Minister of Conservation management purposes only as available for public access and likewise for one of the easement concession routes.
- Support for the easement concession for farm management purposes and the continuation in force of Trust power Generation Ltd right to convey water.
- General support for the proposed conservation areas subject to consideration of some boundary changes and additional fencing.
- Concern regarding lack of public vehicular access.
- Landscape protection mechanisms over Run Block to maintain its 'buffer' status as a visual intermediary from the softer tussock country of CA1 to the forestry below in private ownership.

A number of submissions covered a range of issues that fell outside of the tenure review process, and explanations for disallowing their inclusion in this preliminary analysis have been provided above.

REPORT IN ACCORDANCE WITH CONTRACT 50346

Preliminary Analysis of Iwi Submission for Preliminary Proposal

File Ref: CON/50000/16/12494/00/A-ZNO Submission No: QVV 738 Submission Date: 20/10/2005

Office of Agent: Christchurch

LINZ Case No:

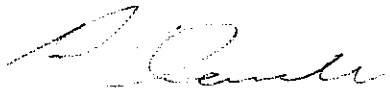
Date sent to LINZ: ^{15/11} 2005

TROG/80

RECOMMENDATIONS

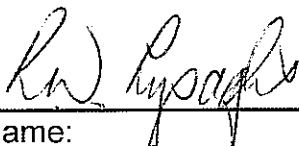
- (1) That the Commissioner of Crown Lands approves this report for tenure review of Po 196 Castle Dent Pastoral Lease.

Signed by Contractor:



Barry Dench
Team Leader for Tenure Review

Approved/Declined by:



Name:
Date of decision: 18/11/05

(1) Details of lease:

Name: Castle Dent

Location: State Highway 8, Bowlers Creek, Lawrence

Lessee: Castle Dent Limited

(2) Details of Iwi Submission:

Received On: 27th September 2005

Received From: David O'Connell
Manager Kaupapa Taiao
Office of Te Runanga o Ngai Tahu

On Behalf Of: Te Runanga o Ngai Tahu and the relevant
Papatipu Runanga: Te Runanga o Otakou, Te
Runaka o Hokonui, Kati Huirapa ki Puketeraki
and Te Runanga o Moeraki

(3) Analysis of submission:**3.1 Introduction:***Explanation of Analysis:*

This is a preliminary analysis of the submission. The purpose of this preliminary analysis is to identify those issues raised which are appropriate for further consideration.

After such further consideration and appropriate consultation, a final analysis of submissions will be completed which will record the outcome of such consideration on each point and whether or not it has been approved for inclusion in the draft Substantive Proposal.

The submission has been reviewed in order to identify the points raised and these have been numbered accordingly.

The following analysis:

- Summarises each of the points raised
- Provides a discussion of the point.
- The CCL decisions whether or not to allow/not allow for further consultation.

The decision to “allow” the point made is on the basis that the matter raised is a matter than can be dealt with under the Crown Pastoral Land Act 1998. Conversely, where the matter raised is not a matter that can be dealt with under the Crown Pastoral Land Act, the decision is to “not allow”. Those points that are ‘allowed’ will be given further consideration with respect to the proposal.

It should be noted that points relating to the Conservation Act, or any other statutory authority outside of the Crown Pastoral Land Act 1998 are not able to be considered by the Commissioner of Crown Lands.

3.2 Analysis:

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Decision</i>
1	Support for the proposal in its current form.	Allow

Ngai Tahu considers that “*the values identified in the Ngai Tahu Cultural Values Report have been integrated into the Preliminary Proposal.*”

The objects of the Crown Pastoral Lands Act 1998 seek to:

1. protect the significant inherent cultural and historical values of Crown land, and
2. enable reviewable land capable of economic use to be freed from the management constraints (direct and indirect) resulting from its tenure under reviewable instrument.

Therefore this point should be allowed so that these views can be taken into account in further consideration of the proposed designations.

Discussion and Conclusions

Te Runanga o Ngai Tahu has provided a submission that takes into consideration the local Maori interest in the Castle Dent Preliminary Proposal. The main point is discussed in detail in this analysis.