

Crown Pastoral Land Tenure Review

Lease name: HOLBROOK

Lease number: PT 120

Public Submissions - Part 4

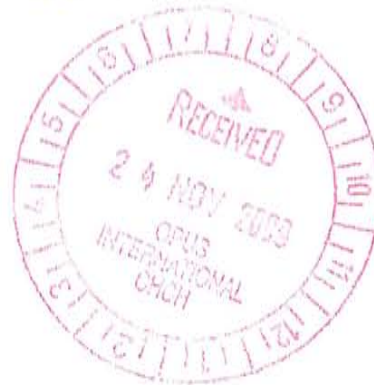
These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

September 10

Submission 9



Submission No. 9



23 November 2009

Mike Todd
Opus International Consultants Ltd
PO Box 1482
CHRISTCHURCH

Dear Mike

TENURE REVIEW – GLENROCK, ROLLESBY & HOLBROOK

The following provides an assessment of Fish and Game values for the Glenrock, Rollesby and Holbrook properties.

Holbrook

1. This property includes the headwaters of Sawdon Stream, and Deadmans Creek. Both streams provide flows to the Grays River.
2. The Grays River supports a popular trout fishery for which tributaries such as Sawdon (including the lower reaches of Deadmans) contain sufficient flow throughout the winter to contribute some spawning habitat for the Grays River fishery.
3. Neither stream is noted for its angling. Generally during the angling season there is insufficient water to provide any adult fish habitat.
4. Therefore any interests that Fish and Game has in respect of this property are solely related to water quality and while the existing use continues there is little reason for concern. Where the use may change to include intensified cattle grazing the likely resultant changes to natural water quality would be of concern.

Provisions

5. Fish and Game seek control of stock grazing in the stream channel of Sawdons Stream between public access points e-f and the northwest property boundary and downstream from SH8 to the property boundary.

Statutory managers of freshwater sports fish, game birds and their habitats

Central South Island Region

32 Richard Pearse Drive, PO Box 150, Temuka, New Zealand. Telephone (03) 615 8400 Facsimile (03) 615 8401
www.fishandgame.org.nz

Rollesby

6. This property borders the Grays River and Mackenzie River. Sections of these rivers and their tributaries are encompassed in the property.
7. The Grays River and tributaries contain brown and rainbow trout fisheries and over the past 30 years the stream has become very popular with anglers. They arrive from all over New Zealand as well as from over seas to fish these waters. Water quality is very important in this catchment.

Provisions

8. Control of stock grazing in the headwaters of the Grays River from I58 168 767 to J56 148 752 is necessary to protect the above values.

Glenrock

9. This property includes tributaries to the Grays River and Mackenzie River and borders the Grays Catchment.
10. Values of the Grays River are detailed above in paragraph 7

Provisions

11. Possible access needed for anglers from I38 128 729 to the provided access e-f. Fish and Game Officer may need to attend a site visit and review this.
12. Control of stock grazing in waterway in section 1- the headwaters of Grays River. For reasons stated above (para 2)

Yours sincerely



Devon Christensen
Resource Officer

Submission 10

20 November 2009

Mike Todd
Opus International Consultants Ltd
PO Box 1483
Christchurch 8140

Dear Mike

**Re: Preliminary Proposal for Tenure Review: Holbrook Pastoral Lease
(Pt 120)**

Thank you for providing the Walking Access Commission with the opportunity to comment on the preliminary proposal for the Tenure Review of the Holbrook Pastoral Lease.

We have reviewed the proposal and suggest that the following enhancement can be made.

Conservation Area 1 (CA1)

We believe that reference in section 2.1.2 page 5 of the document referring to CA2 (as referenced in the map) should read as CA1.

The preliminary proposal makes provision for public access and conservation management access to CA1 by way of easements ("e-f") across the land to be freeholded to Glenrock Station Ltd. The Walking Access Commission supports this route along the valley floor.

A concession ("g-h") in favour of Glenrock Station Limited for farm management purposes is proposed. This will provide access to the high country. We note that the Federated Mountain Clubs are proposing that a public access easement be granted along the fence line linking SH8 with the point "g" (the point at which the concession in favour of Glenrock Station commences) providing access to the Mt Burgess track. The Walking Access Commission supports this proposal.

Conservation Area 2 (CA2)

Public and conservation management easements are proposed for CA2. We note that the Federated Mountain Clubs in their submission have suggested that access should also be made available from the State Highway 8 to the north-eastern corner of CA2 nearest to the road. The Walking Access Commission supports this proposal.

The Walking Access Commission would like to discuss the legal nature and content of the proposed easements (if accepted).

Yours sincerely



Mark Neeson
Chief Executive

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. tetrastricka) 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

Submission No. 12

Received 25 Nov 09
@ 4:05 pm.

Atoll

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 Holbrook 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).

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

The Holbrook Station serves as the hinge of the "gateway to the Mackenzie Basin": from Burke 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 outwash fans, terraces, lower valley floors and hills in Holbrook.

Currently only approximately 3% of the Pukaki Ecological District (ED) is formally protected (*Harding, 2009*)¹. The extensive depleted short tussockland on the uncultivated Sawdon outwash terrace, Sawdon Stream floodplain and Middle Sawdon flats (and slopes above them) offer 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 Ecological Districts, sorted in order of priority for native scrub and freshwater wetland protection as at May 2009, the Pukaki ED is ranked number 4. The extent of scrub is presently only 3% of ED, compared to an estimated original extent of 32%; with only 10% of the present extent protected, or <1% of the original extent protected (*Harding, 2009*)¹.

Conservation Area (CA1):

We fully support CA1 of approximately 3,973 hectares being restored to Crown control as conservation area pursuant of Section 35(2)(b)(i) CPLA 1998.

Subject to a qualified designation:

- An easement concession (g-h on the designation map) in favour of Glenrock Station Limited pursuant to Section 36(1)(a) CPLA 1998.

Changes that we believe are needed:

We propose that CA1 be extended by approximately 578 hectares to approximately 4,551 hectares including the Landscape Units:

- all of Corner Hill
- the Middle Sawdon Flats (with an extension of the Easement Concession g-h to the State Highway 8 (SH8) along an existing track between the Hill and Flats landscape units).
- all of the slopes of the hills above the flats, both from hills at the bottom of the Mt Burgess Ridge and of the Sterickers Mound facing the Highway.
- the Sawdon Stream Floodplain:
 - from about 2.5 kilometers upstream of the Sawdon stream highway bridge, south from a new proposed fence line of approximately 1,500 metres that runs down a clear slope from the Mt Burgess ridge line just behind the front hills which can be seen from the Highway, and then crosses the Stream at the bottom of the Mt Maude valley

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

- east of existing fencing on the true right bank of the stream down to the Highway and on the true left of the stream south of the Highway downstream to another existing fence line which crosses the stream and the gap between it and the Sterickers Mound, beyond which is an existing fenced corridor about 45 metres wide, proposed with another easement concession crossing the floodplain in the extended CA1 where it meets a proposed extended CA2 (detailed below). With the south end of CA1 within the corridor ending when it reaches the top end of the pine shelter belt southwest of Sterickers Mound, using a new gate and fence

Conservation Area (CA2):

We fully support CA2 of approximately 699 hectares being restored to full Crown ownership and control as conservation area pursuant of Section 35(2)(a)(i) CPLA 1998.

Changes that we believe are needed:

CA2 should be extended by approximately 557 hectares to approximately 1,256 hectares including the Landscape Units:

- all of the Sawdon outwash surface of the "Holbrook Big Flat". Development of this area could potentially threaten the integrity of the outwash as a whole.
- the Sawdon Stream floodplain:
 - from a proposed new boundary fence line of approximately 800 metres which crosses the floodplain from the bottom corner of the Holbrook terrace (near Dead Mans creek), east across to the fenced off corridor part of CA1.
 - along the existing western fence line of the corridor south to the Haldon Road
 - with the developed paddocks already fenced off at southern tip of the property to be disposed as freehold



A view looking north along the fence line between a southern cultivated paddock and the remaining Sterickers Mound Pukaki RAP 18 on Sawdon Stream floodplain, all to be made freehold.



Looking up an existing old fence line, planned for use as eastern boundary for planned CA2 in the preliminary proposal; with an area of Sawdon outwash to be made freehold.

The resulting ecological corridor produced from linking CA1 with CA2 may form the last chance to link significant altitudinal sequences in the Eastern Mackenzie basin with the area's intriguing climatic and Significant Inherent Values (SIVs). It has also been identified as having areas of High Visual Vulnerability, which indicates that very little change could occur without changing the qualities of the landscape and being highly noticeable (Conservation Resource Report (CRR)). This occurs on Corner Hill, north of Dog Kennel Corner, where a striking transition from the cooler, moister east faces abruptly gives way to drier west faces. From the alpine mountain tops of the Two Thumb Range down to the basin's Sawdon outwash is a continuous uncultivated corridor, containing very important habitat for the likes of rare skinks and 3 threatened birds. While we were inspecting the property banded dotterels were found, possibly nesting on the Sawdon outwash.



Looking up the continuous natural corridor between the Sawdon Stream and Sterickers Mound.

The extension of CA1 onto the Middle Sawdon flats and surrounding hill slopes will ensure that the impressive natural gateway into the Mackenzie basin from Burke Pass on the Holbrook Station side of the SH8 continues, which opens up into the horizon when you reach the Dog Kennel Corner.

The surroundings of middle flats, hills, the Sawdon Stream floodplain and lower Mt Maude valley hill slopes all help to form a very impressive cultural landscape. It sets an appropriate immediate broader setting for the memorials commemorating the history of the larger basin, and especially for that of the Dog Kennel Corner memorial area. Here you truly know that you have arrived in the dry almost desert like Mackenzie Basin with an outstanding view of the Southern Alps, worth keeping "for all the world" to see.



View of the Middle Sawdon flats extending down to the Sawdon outwash and Edward Stream floodplain just beyond the boundary of Holbrook Station

The entire Middle Sawdon flats and the Corner hill are classed as "at risk" land environments by LENZ, with the adjoining scrub and wetland on Sawdon Stream floodplain upstream of SH8 categorised as either "acutely" or "chronically" threatened, see Proposed Designations Map. The Upper Sawdon stream is a very important habitat for indigenous freshwater fish.



View across Sawdon Stream to a "chronically threatened" area of Carex at the bottom of Mt Maude valley. This area is currently planned for disposal as freehold land without any protective mechanisms.



Matagouri growing on the banks of the Sawdon Stream in an "acutely threatened" environment. This land is also planned to be disposed as freehold over which there will be no protective mechanisms.

While our proposed changes could mean a requirement for approximately 2,300 metres of new fencing, this is approximately 2,600 metres less than the 4,900 metres that may be required for the proposed "R-S" and "T-U" fence lines in the Preliminary Proposal.



Distinctive native grey scrub of matagouri, coprosma and olearia, including prostrate kowhai and native broom species in a "chronically threatened" environment in Mt Maude valley, we propose be added to CA1.

Freehold

We fully support an area of approximately 1,379 hectares to be disposed of 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 over approximately 590 hectares of the Mt Maude valley, upstream of the proposed CA1 extension, proposed freehold land under Sections 40(1)(b), 40(2)(a) and 40(2)(b) of the CPLA 1998 for the purpose of protection of its SIVs (as identified in the CRR)). This includes the Sawdon Stream floodplain in the valley which has been classified as a "chronically threatened" environment by LENZ, since the CRR was published.

Qualified Designation:

- An easement to provide public and conservation management access pursuant to Section 36(3)(b) of the CPLA 1998 in the above mentioned conservation covenant area.
- We further propose a landscape protection covenant over approximately 114 hectares under Sections 40(1)(b), 40(2)(a) and 40(2)(b) of the CPLA 1998. On the large areas of paddocks separated by shelter belts at the northern tip of the Holbrook terrace between the highway and the Sawdon outwash. We understand this area has the best short tussock cover in the area. It is classified as at least a "critically underprotected" environment by LENZ. (The map obtained to get this information is a little unclear, but it definitely shows that this environment is at least at this level of threat.)

Qualified Designation:

- An easement to provide public and conservation management access pursuant to Section 36(3)(b) of the CPLA 1998 in the above mentioned landscape protection covenant area along the western boundary from SH8 to the Sawdon outwash.



Short tussock of Holbrook terrace, above the stark beauty of the uncultivated Sawdon outwash proposed for freehold, habitat for endemic species of this area including a ground burrowing weta (Hemiandrus sp.)

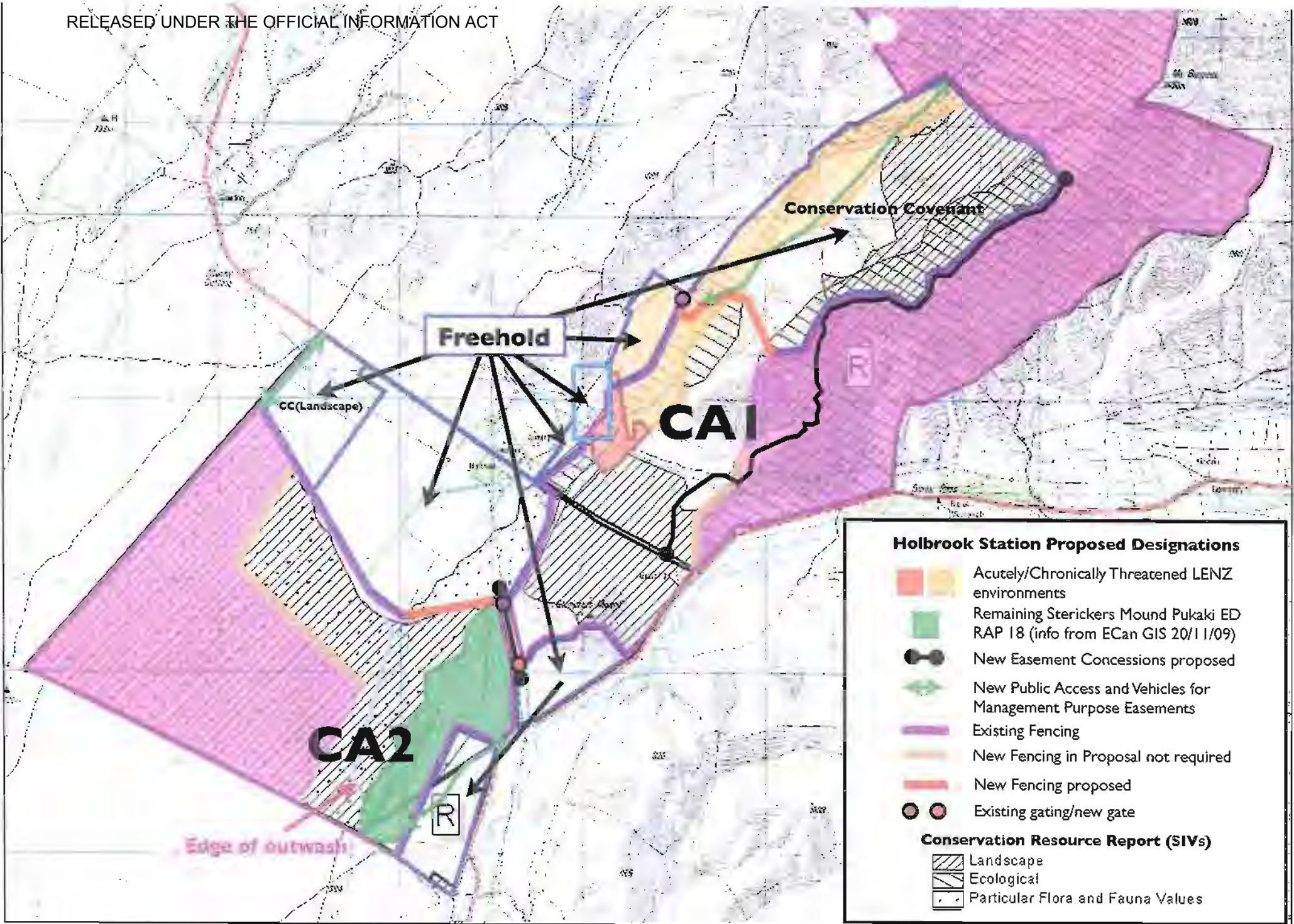
Once again, we thank you for giving us the opportunity to make a submission on this proposal.

Yours faithfully

Andrew Simpson

North Canterbury (Branch Secretary)
Royal Forest and Bird Protection Society of New Zealand Inc.
Cell 021 132 9066
Land +64 +3 Local 379 0316

Attachment 1: Map of Proposed Tenure Designations



Submission 13

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



Mike J Todd
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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