

## **Crown Pastoral Land Tenure Review**

**Lease name : GODLEY PEAKS**

**Lease number : PT 017**

### **Public Submissions**

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

These submissions are released under the Official Information Act 1982.

**May**

**16**

## Submission 1

**From:** Casey Mcneil [[mailto:casey\\_m@xtra.co.nz](mailto:casey_m@xtra.co.nz)]

**Sent:** Sunday, 13 December 2015 9:43 p.m.

**To:** pastoral & tenure review

**Subject:** submission from casey mcneil

I would like to submit these points regarding the tenure review for Godley riverbed and station.

1. I am opposed to the land swap and gifting the area noted as CC1 to the station as this will close out public access to the main streambeds from Crown area CA1 to the Godley Riverbed.
2. I am opposed to Access across station land being prohibited via road shown from point a to cass river bridge, and wish for this to remain public access.
3. I would like public access to be ensured by easements on all streams from Crown area CA1 into the Godley riverbed.
4. I would like 4x4 driving access from Cass river bridge via station tracks in route generally e to h.

I am against this proposal in the tenure review as it will affect safe access to these areas by 4x4 vehicle , also it will cause the loss of more public hunting area, and will cause yet more public land to be unavailable to the general public and more available to paying foreign hunters.

yours sincerely

Casey Mcneil

## Submission 2

**From:** Ian Lawrence [<mailto:redlawrence@hotmail.com>]

**Sent:** Sunday, 13 December 2015 5:29 p.m.

**To:** pastoral & tenure review

**Subject:** Godley Peaks Station Land Tenure Review

To whom it may concern,

I wish to have the following submission considered in relation to the Godley Peaks Station Land Tenure Review.

I am opposed to the land swap and gifting the area noted as CC1 to the station as this will close out public access to the main streambeds from Crown area CA1 to the Godley Riverbed.

I am opposed to access across station land being prohibited by road shown from point a to cass river bridge, and wish for this to remain public access.

I would like public access to be ensured by easements on all streams from Crown area CA1 into the Godley riverbed.

I would like 4x4 driving access from Cass river bridge via station tracks in route generally e to h.

In summary I oppose this proposal in the tenure review due to loss of public hunting area, the lack of 4x4 tracks create risk to safe access and shutting out public land to paid overseas hunting.

Thank you

Ian Lawrence  
13 Stonebrook Drive  
Rolleston, 7614  
Christchurch

Cell: 021 386 133

## Submission 3

**From:** Brian McNeil [<mailto:brianandshelly@gmail.com>]

**Sent:** Monday, 14 December 2015 6:21 p.m.

**To:** pastoral & tenure review

**Subject:** Godley River Submission

I am opposed to the land swap of area marked CC1 this will close of public hunting access to the crown land marked CA1 from the riverbed.

Public access should be granted by easements to all stream beds from the Godley River bed.

The way the review is set out it will give Godley Peaks Station complete control of a large area of public land.

Brian McNeil

## Submission 4



**From:** Ngaire Fewtrell [<mailto:kevin.ngaire@xtra.co.nz>]

**Sent:** Wednesday, 16 December 2015 7:22 a.m.

**To:** pastoral & tenure review

**Subject:** Submission on Godley Peaks Station

Dear Commissioner,

I write to you with my concerns regarding the tenure review in progress for Godley Peaks Station with the adverse effects this will have on NZ private citizens/recreational users of this wonderful part of our public lands. As you would know public access to our wonderful outdoors is constantly under threat due to the increased difficulty in gaining permission to cross the private/leased blocks adjoining the public estate, therefore I submit that.

1. I am opposed to the land swap and gifting the area noted as CC1 to the station as this will close out public access to the main streambeds from Crown area CA1 to the Godley Riverbed.
2. I am opposed to Access across station land being prohibited via road shown from point a to cass river bridge, and wish for this to remain public access.
3. I would like public access to be ensured by easements on all streams from Crown area CA1 into the Godley riverbed.
4. I would like 4x4 driving access from Cass river bridge via station tracks in route generally e to h.

My reasons are the loss of public access which will give an unfair advantage to the privately owned and run AATH operators over the public lands due to the fact we would have to drive 16km's up the Godley River or walking access up the Mistake River via the Cass River which in effect locks up prime Tahr hunting grounds on public land to private operators. Also with the loss of 4x4 access this creates a very real health & safety issue and as I have stated the NZ public loses a valuable hunting area to the interests of paying overseas hunting interests. This is grossly unfair to the hunting/recreational users of this area.

With Highest Regards;

Kevin Fewtrell  
83 Plateau Road  
Te-Marua  
Upper Hutt 5018

## Submission 5

Commissioner of Crown Lands  
Land Information New Zealand  
Crown Property  
CBRE House, 112 Tuam Street  
Private Bag 4721  
CHRISTCHURCH 8140

South Canterbury Section NZ Alpine Club  
PO Box 368  
Timaru  
16/12/15

Email: [pastoral&tenurereview@linz.govt.nz](mailto:pastoral&tenurereview@linz.govt.nz)

Re Tenure Review Proposal

Lease name : GODLEY PEAKS

Lease number : PT 017

The current proposal denying the public any vehicle access through this property represents a very poor outcome for the New Zealand public. Whilst it is accepted that the existing access track runs through the middle of the farming operation the current proposals for public access will effectively deny all but the most determined reasonable access to adjacent crown lands and much of the upper Godley valley. Whilst there is good vehicle access to the Godley valley via Lillybank station getting to the true right bank of the valley requires a hazardous river crossing if vehicle access is denied via Godley Peaks.

We are not averse to a charge being levied for vehicle access.

Anyone with knowledge of the Godley valley understands that it is unrealistic to expect people to walk all the way from a car park at the Cass River to the upper reaches of the Godley valley. If we are to be denied vehicle access the lake shore access from point C should be of a standard that would at least allow mountain bike and motorbike access.

In requesting a concession for helicopter access to Mistake creek the leaseholder is acknowledging the value of this destination to the public. Under the proposal outlined a tramper wishing to walk to the upper Mistake basins would have to first walk to point "D" from the carpark at point "C". Surely a more direct poled route could be provided to the Mistake River. If the farmers stock can be trusted to not wander onto CA1 (unfenced crown conservation area) surely the public could be trusted to keep to a poled direct route to the upper Mistake valley!

Ian Rogers

For the SC section NZAC

## Submission 6



Saturday, December 12, 2015  
Commissioner of Crown Lands  
Crown Property & Investment  
CBRE House, 112 Tuam Street  
Private Bag 4721 CHRISTCHURCH 8140  
To Whom it may concern

Chris Pearson  
18 Rewa St  
Dunedin

I would like to make the following submission for Preliminary Proposal for the Tenure review of Godley Peaks pastoral lease which is undergoing tenure review under the Crown Pastoral Land Act 1998. I believe that this tenure review would lead to a valuable addition to the conservation estate and I think it would significantly improve public access in the Mackenzie basin.

I strongly support CA1 in the designation plan which would add valuable mountain land to the conservation estate. It is nice to see public access being formalized for the Hall Range and the mountains along the west side of Lake Tekapo which are spectacular mountains that the that very few people have had the opportunity to explore however I doubt that the easements, while they may provide public access to the lake shore do not provide practical access to the Godley Valley. I was fortunate to be able to explore this area in the 1990's surveying and it made a lasting impression on me. I established earth deformation points up Mistake River valley in 1995 and thinking that this would be a great place for a tramping trip however I never did come back because of the difficulty of arranging access. I believe that the major benefit of this proposal is to provide public access by right up the Mistake River because this practical route for the public to access the land and also provides access to the large area of stewardship land on the Hazard Range. Unfortunately, the access easements ef and gh which should provide access up the Mistake River do not provide any access to the public. There is also a legal road which also would provide legal access to Mistake Creek which just stops in the middle of a paddock. I would like to see some easement developed to connect between this and the other legal road that passes near the airstrip. I also feel that it is essential to provide a provision for public walking access on the access easements ef and gh. I also note that the legal alignment for the Godley Peaks Station road does not follow the formed road in several places on the approach to the station house. This should be sorted out as part of the tenure review process as this road is essential to providing public access and it is not secure till the road is on its legal alignment.

Sincerely yours

Christopher Pearson

## Submission 7

17 December 2015

Commissioner of Crown Lands  
Land Information New Zealand  
Crown Property & Investment  
CBRE House, 112 Tuam Street  
Private Bag 4721  
CHRISTCHURCH 8140

To Whom It May Concern:

### Godley Peaks Tenure Review Submission

Thank you for the opportunity to lodge a submission on Godley Peaks Preliminary Proposal for tenure review. I support parts of the Preliminary Proposal (PP) in its current form; however I have a few proposed amendments that will be discussed in this submission.

24	<b>Objects of Part 2</b> The objects of this Part are— (a) to— (i) promote the management of reviewable land in a way that is ecologically sustainable; (ii) subject to subparagraph (i), enable reviewable land capable of economic use to be freed from the management constraints (direct and indirect) resulting from its tenure under reviewable instrument; and (b) to 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; and (c) subject to paragraphs (a) and (b), to make easier— (i) the securing of public access to and enjoyment of reviewable land; and (ii) the freehold disposal of reviewable land.
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### Section 24 CPLA 1998

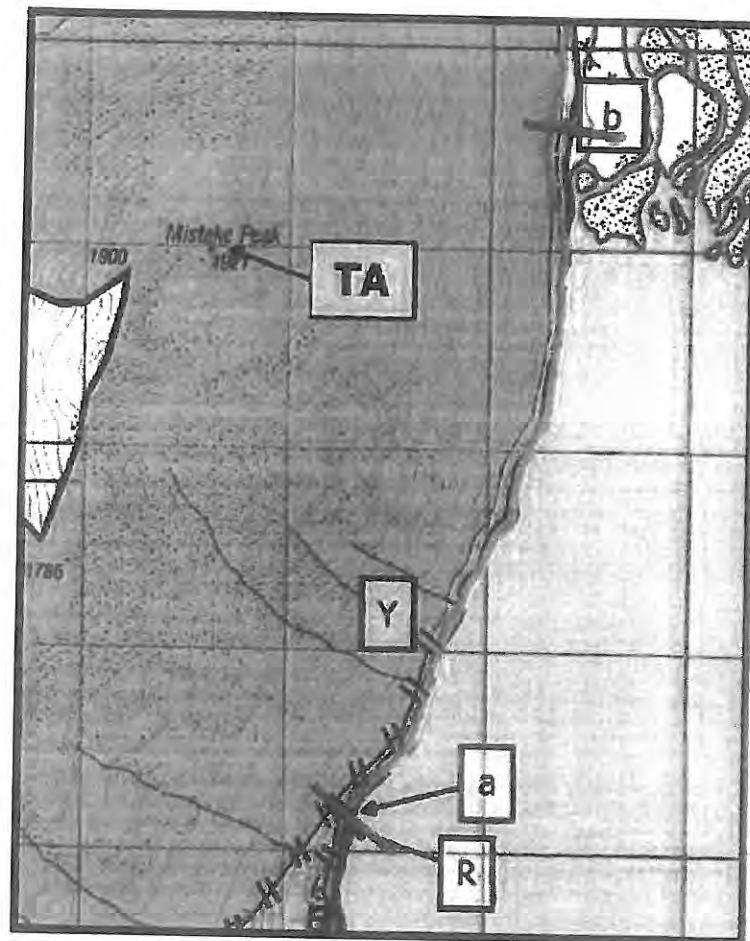
#### Point 1:

#### **Land to be freeholded & land to be retained in Crown Control**

I generally support the proposed areas of freehold and retention of CA1, CA2 & RR1 by the Crown. It appears that the proposed freeholding of Crown Land has been very generous in this proposal, since many other implemented tenure reviews generally do not result in freehold of such high altitude and steep land. In this proposal, land subject to CC1 will be freeholded up to the 1300m contour and land up to 1178m or so will be freeholded, unencumbered by any protective mechanisms. The proposed boundaries are acceptable and should remain unchanged with the following exception to be discussed below in Point 2.

**Point 2:**

Land designated as freehold between “a” and “b” and associated public access issues



**Diagram 2.0**

In its current form, the PP proposes to freehold a thin strip of pastoral land between “a” and “b” (see Diagram 2.0 above). This strip appears to be no more than 100m wide or so, and based on a length of 4km, this gives an approximate area of 40 Ha. The terrain along this section is generally steep, rocky and of no significant farming value. If an extra 40 Ha of pastoral land is desired to be freeholded, it would be better to be taken off a different part of CA1; for example above Mistake River or adjoining the Cass River.

How is it possible that a 100m wide strip of land containing essentially the same ecosystems and features is suitable to be freeholded (fully unencumbered), but the uphill adjoining land (CA1) is not???

In this instance, it is clear that this strip of land is not proposed to be freeholded because it is ecologically sustainable to do so as provided for under section 24(c)(ii) CPLA 1998. Furthermore, this land is not required to be freeholded for the purpose of servicing CC1. The best alternative is to allow for farm access via a “Farm Management” easement concession, which is commonly utilised by other tenure reviews.



It is therefore obvious that this strip of land has been “negotiated” to be freeholded for a very different reason than the desire to acquire an extra 40 Ha of freehold land. The reason for proposed acquisition of this land is simply to deny practical public to the true-right Upper Godley Valley forever.

As it currently stands, clause 2.1 of the Easement in Gross for public access (p.155 of PP) does not allow for motorised public access. This is unreasonable.

It is approximately 18 km from “a” to reach CA1 at point “r”. For a member of the public that wishes to go climbing or tramping in the upper reaches of CA1, they would have to walk 18 km along an existing vehicle track before they even reach point “r”. An 18km easement would take approximately 5hrs to walk. Not only is access to upper CA1 made difficult, but also all the existing public conservation land in the whole Upper Godley. This is a very serious issue.

The PP is unclear as to whether or not motorised access will be allowed for by the Department of Conservation along “RR”. If this is not the case, vehicle access could occur through the main freehold area via the existing legal road, although this would likely be very undesirable for all parties involved. Hence, it is in everyone’s best interest that vehicle access is provided for along “RR”. No motorised access over “RR” would mean another 7 km of walking in addition to the 18 km further up the valley.

It seems that public access has been added to the PP as a token gesture, as it does not give full effect to section 24(c)(i). The two objects contained in section 24(c)(i) & (ii) are subject to the first two paragraphs in section 24 and clearly have equal weighting as neither is subject to, or preferable to the other. There is legal agreement that there is a hierarchy within section 24 of the Act. As it currently stands, this is not being followed by the PP, but rather twisted it to suit.

Section 24 states that it is an object of tenure review to “make easier” both the “securing of public access to and enjoyment of reviewable land” and the “freehold disposal of reviewable land” [subject to paragraphs (a) and (b)]. A legal road exists through the pastoral lease and up the Godley Valley (and along the lakeside), so the proposed public access easements can hardly be justified as providing easier public access to what already exists.

It is clear from the PP designation plan, that the “freehold disposal of reviewable land” has definitely been made easier, which gives effect to section 24(c)(ii). However, it is also clear that the “securing of public access to and enjoyment of reviewable land” has not been made easier by the PP in its current form; at least not to the same level.

Taking into account the woefully inadequate public access provisions and the number of concessions “negotiated”, it could be viewed that the intention of this PP is to discourage the public as much as possible so that they do not visit these public lands. Who benefits from this??

### **Conclusion:**

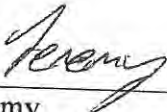
For almost all of the land concerned, this PP is acceptable. However, it is substantially let down with regard to the proposed public access provisions.

I ask that the land proposed to be freeholded between “a” and “b” be retained in Crown ownership. This can be by way of addition to CA1 or RR depending on DOC’s preference. Note that this will also negate the need for approximately 1 km of unnecessary fencing between “a” and “Y”, the cost of which would otherwise fall on the Crown (i.e. taxpayers).

I ask that motorised vehicle access be allowed for in the easement documentation. Motorised public access is required up to point "r". Should substantive proposal negotiations break down around this issue, I ask that provisions for a DOC controlled gate be considered. This could be installed at point "R" and be managed in a similar way to the Molesworth Acheron Road gate, with access restricted in extreme weather or during stock droving/mustering for example.

Thank you for considering this submission, and I trust it will be given serious consideration.

Yours sincerely

  
\_\_\_\_\_  
Jeremy  
Christchurch

19/12/2015  
\_\_\_\_\_  
Date

## Submission 8

Commissioner of Crown Land  
Private Bag 4721  
Christchurch

David W Hodder  
408B Barrington St  
Christchurch 8024

21 December 2015

### **Submission on Godley Peaks Station Tenure Review Preliminary Proposal**

#### **Introduction**

I'm a 74 yr old hunter/fisherman who has hunted/fished since my teens. Joined the NZ Deerstalkers when I moved to Napier as an electrical engineer with the NZED in 1971, and was appointed to the NZDA national executive in 1981, the year I moved to Christchurch.

I have hunted most areas of our three islands and been on the Himalayan Tahr Control Plan Implementation Committee, as a NZDA representative, since its establishment in 1993.

I have made numerous submissions concerning recreational hunting and consider I have a fair insight into the 'public interest' regarding this recreation in NZ. As a member of the Tahr Interest Group I have organised two TIG operations into the Mistake River to monitor the tahr population, and numerous such tahr hunting/survey trips into the backcountry of other stations like Lilybank, opposite.

#### **Tenure Reviews**

This is the current process, developed by the government and the high country section of Federated Farmers, to change the 'perpetual pastoral leases' governing pastoral leases of Crown land, to a combination of Crown and Freehold land with a range of conservation contracts/concession and access easements across the lower freehold land to the mountain lands behind/above which remain crown land. Often there is a large braided river beside the proposed freehold land, which can afford some public access to that boundary, when river conditions allow.

#### **Godley Peaks Proposal**

This station is situated such that it can control the access up the Godley River, in the McKenzie Basin, upstream of the top of Lake Tekapo, on its south side, right up to the boundary of Mt Cook/Aorangi National Park. This station has controlled this access route to public land for many years. This review allows a negotiation, initiated by the leaseholder, for the public to recover its right to utilise the land, and for the leasee to achieve freehold title to that land that is considered suitable for sustained farming use. A large area at the rear of the station, encompassing the Mistake River upper catchment has already been withdrawn from the station lease as being unsuitable for pastoral grazing. This river drains through the homestead flats of the present station creating a major geological feature.

### Godley river access

For the best outcome, for the sake of our NZ river water quality, I would like to see all stock removed from public waterways. The world climate changes and the proven fall in our NZ water quality recordings require some positive action on the part of all New Zealanders. Now is the chance with this Tenure Review to make a start in implementing policies that support our image as – 'NZ Clean & Green' and improving our water quality. I therefore do not agree with farming of the Godley river flats without fences to prevent stock from accessing the riverbed and side streams. If this is not economic for the farming of this area of the high-country, there should be no farming allowed.

It is good that the lease has agreed to allow the public greater use of the road/track above Lake Tekapo to the Godley River bank and therefore the north facing slopes of the Hall Range that runs from Lake Tekapo up, over 15km, to the Liebig Range of the Mt Cook/Aorangi National Park. Obviously there will be a need to close this road for either winter weather conditions or farming operations so there will be a need to publicise these closures. This will need some discussion with a representative of the recreational users to formalise and communicate its annual operations.

However, the only public access/easement to these slopes along this 15km stretch of proposed freehold appears to be at Pollock Creek. Another access point at say Hogget Stream would seem reasonable for public hunters, from the access track. Another option, which I prefer, due to this section of land not being suitable for fencing off from the adjoining public conservation land, is to farm the area under a grazing license for periods of say 10 years, so as to allow LINZ to re-assess the impacts on the adjoining public lands from the wandering stock. I would expect there to be a stock limit set by LINZ for this area.

### Mistake River and Cass valley access

There will be access required for foot hunters, and in the future, horse trekkers, into these two valleys which will require some more specific and marked access routes. This could be accommodated with the combining of DOC's management access easements. Some provision needs to be made for these.

### Improved Property/Asset Protection

The NZDA has mentioned to some Federated Farmer representative, in the past, the idea of developing a credit-card sized identification card for issuing to members of registered recreational clubs, who have earned the right to carry the card by virtue of their training, qualifications, experience, relevant commendation(s) etc to backcountry/farming/wilderness living, that meet a set of standards, set by say, Fed Farmers/DOC/NZDA/SCI/ NZ Hunting guides assn/GAC. These to be issued by authorised national bodies that have suitable rules, code of ethics, regulations etc, that allows them to discipline or expel members.


I would be happy to speak to this submission.

Yours faithfully

David W Hodder

03 339 7038

s.d.hodder@xtra.co.nz



## Submission 9



# New Zealand Deerstalkers' Association Inc

Canterbury Regional Access Group  
c/- PO Box 9034, Tower Junction, Christchurch 8149

David Hodder, ph 03 339 7038 / 027 616 1290, email s.d.hodder@xtra.co.nz  
Stewart Hydes ph 03 329 6292 / 021 403 927, email jackhydes@clear.net.nz

22 December 2015

Submission to:  
Commissioner of Crown Lands  
Land Information New Zealand Crown Property  
CBRE House, 112 Tuam Street  
Private Bag 4721  
CHRISTCHURCH 8140  
Email: [tenurereview@linz.govt.nz](mailto:tenurereview@linz.govt.nz)

## GODLEY PEAKS – TENURE REVIEW

### 1. Introduction

The New Zealand Deerstalkers Assn has, as some of its objectives:

- To obtain to the greatest possible degree, access to the recreational herds of New Zealand for all
- To negotiate with the landholders of private land for the right of access to the game herds thereon
- To maintain the principle of recreational use as of right for all outdoor sports men/women of all unoccupied land held by the Crown and other public bodies
- To oppose the freeholding of Crown lands held under pastoral lease or licence unless – for all recreational land and wetlands - satisfactory public access has been retained in Crown ownership / control.

Recreational hunting is a legitimate activity that contributes significantly to conservation values (through contributions to control wild animal populations) – and thus commands a rightful expectation of legitimate public access, for the purpose of this activity.

NZDA therefore advocates, in the strongest possible terms, that LINZ has a powerful obligation – on behalf of the people of New Zealand – to effectively negotiate to secure reasonable, practicable public access across reviewable land to crown land and public recreational hunting grounds beyond, during the Tenure Review process. The Tenure Review process defines what history will see as a significant watershed moment, in terms of the restoration, preservation and/or enhancement of the public's expectation (in our egalitarian society) of reasonable public access across reviewable land to crown land and public recreational hunting grounds. Any failure by LINZ to provide for reasonable, practicable public access in Tenure Review outcomes entrenches what is likely to be an ever-lasting loss of the historical / customary / traditional right of reasonable public access expectations (across subject reviewable land).

## 2. The NZ Recreational Hunter

A long-serving DOC Field Officer once commented that in his observations over several decades, the vast majority of people making use of the DOC Estate, and indeed any land for recreational purposes – will range up to a maximum of three (3) hours walk, from where they can park their vehicle. Whilst empirical data to support this observation may be difficult to obtain – NZDA strongly advocates from its understandings from its membership - that this is highly likely to be true. Including of recreational hunters (underpinned by justifications for vehicle access explained elsewhere in this submission, for example the time constraints imposed by busy lives on modern recreationalists). This redoubles the importance of reasonable and practical vehicle access “to the bottom of the hill” – as this effectively defines the penetration of the vast majority of recreational activities (including recreational hunting), into the DOC estate / crown land. In the case of recreational hunting in particular, this is vitally important – as it strongly influences the impact that the vast majority of recreational hunting effort will have – on harvesting of game animals, and thus population management. What recreational hunters do not achieve in terms of game animal harvesting – may require culling at the taxpayers expense.

NZDA believe recreational hunting is a far more important national activity than it is often given credit for, for reasons including:

1. Assisting to keep a sector of the population fit, active and healthy (in this day and age of increasing population obesity and diabetes);
  2. Passing on practical outdoor skills and interest from generation to generation (these skills are then fed back into the community in a myriad of different ways, eg through participation in Search and Rescue Teams, firearm safety and bushcraft training);
  3. Assisting conservation values through wild animal population management (including assisting with TB control, mustelid extermination, wild cats and other pests that hunters know to destroy on sight, wherever possible);
  4. Keeping alive a tradition that is very close to the heart of what it means, to be a Kiwi.
- These permeate our national culture at almost every level. For example, many rugby players - incl All Blacks past and present - have spent time with deer on their backs.

## 3. The Key Historical Issue

A key issue for the public – including recreational hunters and NZDA members in particular - is restoration or preservation (and where possible, enhancement) of a reasonable expectation of customary, traditional and historical practical access.

Particularly, access across privately controlled land – to enable access to the crown land / DOC estate beyond.

This expectation appears particularly valid – where access is across reviewable land under the Crown Pastoral Land Act.

It cannot be stressed enough how untenable it is that this historical / customary / traditional public expectation of access is denied, or excessively restricted - especially where this is to effectively provide (or where as a consequence this does provide) an exclusive benefit to the adjoining landholder.

It is noted that reasonable, practical public access expectations are based upon 150 years of egalitarian access reasonably provided by New Zealand landholders – that formed the basis of European settlement of New Zealand. And that by and large have been part of our New Zealand culture, throughout our recent history.



Reasonable and practical vehicle access “to the bottom of the hill” is vitally important for the public – recreational hunters – and NZDA members in particular, for a number of reasons – including but not limited to:

1. to maintain access for older and/or disabled participants (these people deserve to be protected from access discrimination – we may all hope to make it into this category, one day!);
2. to enable recreational including hunting trips to occur – when time is scarce;
3. to enable meat to be recovered – particularly, in both of the above circumstances;
4. importantly, for health and safety reasons (to allow ready extraction of a climber, tramper or hunter who may have for example suffered a fall, or in case of other accident or injury);
5. vehicle access assists conservation values by facilitating efficient game population management (an important consideration).

#### **4. Enough is Enough**

NZDA strongly advocates that “enough is enough”. Witness has been borne of substantial erosion of practical public and recreational hunting access (including the right to carry firearms for a legitimate recreational purpose, and practical vehicle access “to the bottom of the hill”), as part of past Tenure Review processes. A substantial opportunity to improve recreational access outcomes – negotiated as part of these processes - has been missed. LINZ is negotiating on behalf of its constituents – ultimately the public of New Zealand – and has thus failed these constituents to some degree, in this regard. We do not want history to record that we are the generation that gave away the legitimate expectation of public access (and documented / entrenched that loss), via these processes. NZDA calls upon LINZ to advocate and negotiate more effectively, for the practical and workable public and recreational access identified in this submission.

No landholder should have the opportunity – presented to them via the pastoral lease Tenure Review process – to deny the public of New Zealand what is rightfully theirs. This being the expectation of negotiation for provision of practical recreational access (including across reviewable land freeholded by the Tenure Review process) to the DOC Estate / Crown land beyond.

#### **5. Unfair Restrictions**

There is nothing more demoralising as an activity for a recreational hunter to have to undertake – than lugging animals and equipment down a perfectly good 4WD track. Indeed, this is so demoralising (not to mention time-consuming) that it very effectively limits the number of recreational hunters who will participate. Landholders know this – and therefore know that restriction of reasonable and practical vehicle access “to the bottom of the hill” supports and enhances an exclusivity of use of adjoining DOC Estate / Crown land (that may then be exploited for commercial gain).

## **6. Free Game Management**

The public – recreational hunters – and NZDA members in particular – play an important part in game animal management. This management is provided free-of-charge (avoiding the need for significant amounts of NZ taxpayer's money).

As just one example, a recent NZDA (Rakaia Branch) recreational hunting trip culled in excess of 160 tahr in a single weekend, from the Ben McLeod Range. Imagine how many tahr can be culled over 12 months, by recreational hunters? Certainly – as is well understood – recreational hunting has a significant impact. This effectively greatly reduces or may completely negate the need for spending of taxpayers' money, on SAD activities.

This submission, and the public access it advocates for, greatly supports conservation values (through game animal management) in the area under review in this Tenure Review process – and this demands reasonable and practical public recreational hunting access “to the bottom of the hill” for the purposes of such game animal management.

## **7. Recent Restricted Public Access Irrelevant**

Many pastoral lease landholders have actively restricted public recreational access (including access for recreational hunters). It is asserted that whether or not current and past landholders have allowed recent practice of public access across pastoral lease lands (to get to DOC Estate / crown lands beyond) is irrelevant. The Tenure Review process represents a unique, one-off and last-chance opportunity to negotiate for and entrench legal public recreational access across reviewable land – before the Tenure Review process is concluded, public-owned pastoral lease land is freeholded - and thus potentially lost from crown control or public influence forever.

## **8. Limited Practical Public Access Less Problematic than Excessive Restrictions**

Longstanding high country landholder Bob Brown (previous owner of Glenthorne Station, in Canterbury) once wisely remarked that after all of his experience over several decades managing public access to the high country, he had learned the following:

1. allowing unrestricted public access causes problems, for the landholder;
2. trying to excessively restrict public access causes even worse problems, for the landholder;
3. limited public access (ie via restricted pathways) is the best strategy, for the landholder.

As such, NZDA advocates that trying to totally restrict (prevent) practical public recreational access (including the right to carry firearms and 4x4 vehicle access “to the bottom of the hill”) across Godley Peaks Station land is likely to cause unnecessary problems and friction. The best approach is to provide limited but practicable public access (via restricted pathways). This is what NZDA seeks.

## 9. Halting the Godley Peaks Tenure Review Process

Specifically, it is NZDA's preferred view that the currently proposed public access outcomes for the Godley Peaks Tenure Review are so bad, the review process should not proceed. It should be halted – and public / recreational hunting access outcomes re-negotiated.

**For example, as the landowner – LINZ should seek rationalisation of the Unformed Legal Road and the existing formed track that provides access through the property and up the true right of the Godley River. The Unformed Legal Road should be realigned to follow the existing formed track.** Under the current Preliminary Proposal - the landholder has successfully pushed public access - without any 4x4 access – to the edges of the property.

## 10. Recreational Hunting Grounds Adjacent To (Immediately Beyond) Godley Peaks of Particular Interest

Godley Peaks is an example of an iconic, end-of-road property – that effectively controls access to strategically important recreational lands.

Adjacent to (immediately beyond) Godley Peaks is land that due to the generally favourable terrain and relatively close proximity is very readily accessible to public recreationalists / recreational hunters, and thus of particular interest to NZDA's membership. As such - greater focus and effort is warranted to ensure superior practical recreational hunting access is secured, through the Tenure Review process.

As said elsewhere in this submission, access is a key issue for recreational hunters. Responsible clubs have the opportunity to negotiate access on behalf of their membership. In 100% of cases, recreational hunters are targeting introduced species – and are thus providing a service to landholders, and New Zealand taxpayers at large (assisting to control wild animal populations). It is a proven fact that the existence of negotiated access to recreational hunting grounds in relatively close proximity and with favourable terrain, supports membership of responsible clubs and organisations. Recreational hunters will hunt anyway. The more these recreational hunters are encouraged and provided with reasons to join a responsible club or organisation – the better it is, for all parties.

## 11. Godley Peak Public Access – T R Proposed

Access onto Godley Peak pastoral lease land has, in recent years, only been possible by invitation or the payment of fees, either for hut hire and/or road access. As a result few recreational hunters have had experience of the access situation along the southern faces of the Hall Range, or the station track between the 'home block' and the 'Godley River bank block'. It is acknowledged that the station has agreed to allow the public conditional use of their track/road around the Tekapo Lake edge to the lower Godley riverbank by Sutherland Creek.

11.1 It is understood this **lake-side road / track** of approx six kilometres is virtually closed during most of the winter months due to snow conditions across the hillsides above. During such time it is often possible however to cross the Godley river, due to very low winter flows in the river braids, and hence provide recreational hunter access from the Lilybank (north) side. There will also be times when this track will be used to shift stock back to the homestead facilities for management/stock health purposes, preventing non-farming use.

11.2 With 4x4 vehicle tracks up this south bank of the Godley being mainly on the proposed freehold land **a new public 4x4 access route will need to be found/formed in the Godley riverbed, along some sections.** eg: between n-o and p-q on map sheet 1 .

11.3 The gap in the freehold land strip beside the Godley river at **Pollock Stream** appears to provide the **only public access to the mountain faces**, from the top of Lake Tekapo and Angus Flat where the property ends. This is inadequate - along **a distance of approx. fifteen kilometres.**

11.4 **Mistake River valley** 4x4 access through the station is apparently very difficult and often is impassable after adverse weather. There is apparently an Unformed Legal Road up the Mistake riverbed to the Middle Gorge hut but its route is impractical. Although the Dept of Conservation has arranged for vehicle access for management purposes towards the Mistake valley (g-i, g-h, and e-f) there is no public access indicated. The hut in the mid Mistake valley was upgraded by DOC but it appears to get little hunter use as the upper valley vegetation and terrain seems unattractive for holding tahr all year round. Access has been mainly via helicopter from the end of the Lilybank Rd.

11.5 **Cass river access** via Godley Peaks property apparently affects a very small section until the 4x4 vehicles can access the riverbed proper, but it is a popular recreational hunting area that requires permanent hunter access for wild animal control. It is accepted that Glenmore Station has the better access country to the Cass riverbed, from the right bank.

11.6 There appears to be **no fences necessarily required to keep the Godley Peaks stock from encroaching onto public lands**, returned to the Crown, along the 15 kilometres of the Hall Range faces, backing onto this proposed strip of freehold grazing land.

11.7 **The provision of a tourism concession** to the owner of Godley Peaks, is rather vague but we assume this will include guided hunting and AATH activity over the whole of the Hall Range. Recreational hunters are opposed to AATH as this unethical activity often ruins any recreational hunting occurring within the distance of the sound of the helicopter. Guiding hunting on public land has no priority over public recreational hunting. With the Hall range faces coming back to full public land status above the 1,000m contour we would like to see some oversight on this possible conflict between this commercial activity and public recreational hunting on public land.  
**This may need to be referred to the Game Animal Council for oversight and recommended guidelines.**

## 12. Submitted Changes to the Preliminary Proposal

12.1 The access ways to hunting areas must allow for the carriage / carrying of firearms.

12.2 There should be a general provision for 4x4 vehicle access up the true right hand side of the Godley river from the end of the public road to Rankin Stream, outside the winter period, and for those periods where the track/road is not being used for programmed farm management purposes. A reasonable annual lake-side road-use timetable, and some access/maintenance fees should be negotiated between the station owners and the New Zealand Deerstalkers Assn or another nominated registered hunting body, for the purpose of public notification.

12.3 The first sentence of clause 16 of the public access easement document should be modified to clarify the reason for any closure of the Easement Area marked 'a-b' – and such reasons should provide for as little public access restriction as possible (including period of closure – for example, **any closure for lambing should be for a period not to exceed 6 weeks**).

12.4 We recommend that the narrow strip of land in **CC1**, up the banks of the Godley River to Angus Flat **SHOULD NOT** be designated as freehold as there seems to be little or no control over stock **without fences** along this riverbank, and would be better used under a **grazing licence** with a specified renewal period that allows LINZ to review the appropriateness of grazing stock along a narrow, 15km long strip, of riverbank based on the impacts on the adjacent Crown conservation lands.

12.5 **If however this riverside land CC1 is made freehold**, then public walking access should be secured to the Mistake River, Sutherlands Creek, Ribbonwood Creek, Pollock Stream (as indicated in the Proposal), Kea Gully and Manning Stream (as depicted on the Proposal drawing sheet 1 of 2) from the access track/road. Where the streambeds are ill-defined DOC may need to install track poles.

12.6 Due to the great variations of river flows during spring and the end of summer, when the bull tahr start their mating season, trophy hunters become more mobile and farming operations could close the lake-side road, availability. **The provision of an airstrip near the mouth of Pollock Stream or Angus Flats could be a solution for hunter access?** (Similar to the Growler airstrip up the Rangitata River south bank on Mesopotamia Station.) Allowance for such additional access should be noted in the TR Proposal.

12.7 There should be at least a public walking access route, marked along the DOC easement onto conservation land and **into the Mistake valley**.

12.8 **Cass riverbed** access on the **true left hand bank**, should be better defined from point 'e' beside the road, across the station paddocks to point 'd' and/or between points 'c' and 'd' to provide for a long-term **walking access** route to point 'd'.

### 13. Additional Security Assurance Measures

NZDA would be prepared to discuss considered access provisions for NZDA Members only – if this is acceptable to the Landholder. While not an ideal arrangement – we suggest that access provisions restricting access to card-carrying NZDA members or other registered organisations, provides landholders with important assurances:

1. NZDA is a responsible registered organisation;
2. NZDA members are bound by a code of conduct (providing the landholder with general assurance of a better-than-average standard of conduct, when compared with the public-at-large);
3. NZDA members are covered by Public Liability and Rural Fire-fighting Insurance.

#### **14. Negotiation Process / Resources**

NZDA are willing and prepared as much as possible to provide voluntary resources and representation to work with LINZ, landholders and other parties to further propose and assist with the negotiation process around the acceptable provision of requested access.

NZDA have recently restructured access advocacy resources in Canterbury (including the formation of the Canterbury Regional Access Group, representing 5 NZDA Branches and a direct membership approaching 1,000 – also acting on behalf of a total national NZDA membership of 48 Branches and around 10,000 members), to more effectively be able to work with parties to assist with securing and retaining optimal recreational hunting access.

#### **15. Verbal Submissions**

As an organisation representing 48 Branches and around 10,000 members nationally - NZDA strongly requests the opportunity to speak to this submission.

NZDA appoints as it's representatives for the purposes of this submission the Canterbury Regional Access Group (refer contact details below).

Yours faithfully

A handwritten signature in black ink, appearing to read 'S Hydes'. The signature is written in a cursive style with a large, sweeping initial 'S'.

David Hodder ph 03 339 7038 or 027 616 1290  
Stewart Hydes ph 03 329 6292 or 021 403 927  
Joint Co-ordinators  
New Zealand Deerstalkers Association Inc.  
Canterbury Regional Access Group  
Christchurch

## Submission 10

Craig Benbow  
904 Highfield Road  
Aylesbury RD1  
Christchurch 7671

Submission to:  
The Commissioner of Crown Lands  
Private Bag 4721  
Christchurch 8140

Tuesday, 22 December 2015

### **Godley Peaks –Tenure Review Preliminary Proposal**

I am Secretary of the Malvern Branch of New Zealand Deerstalkers Association. I write this submission as a private individual with a particular interest in suitable access being provided to public conservation land for hunting or other activities such as fishing, walking and climbing and of course retiring of crown pastoral lease lands that are largely unproductive or unsuitable for continued grazing in the current climate.

I have reviewed the proposed tenure review proposal and visited the station on 11 December. I understand this has been a long and protracted process and I am sure there have been many concessions from both sides to come to the proposal outlined.

#### **Provision of a 50 metre easement along the lake edge and across the freehold parcel including the Black Stilt Sanctuary:**

I support this provision as a suitable alternative to access via the farm track due to the fact the Station is a working farm and the farm track is a busy thoroughfare not suited to unannounced visitors. The 50 metre strip is adequate to develop a formed surface if desired and is a generous practical solution for lake side visitors and those wishing to venture farther west into the Godley River Valley.

Some clarification of boundaries where the easement meets the farm track at the lake edge and how visitors can access the public land immediately above is needed to ensure free and unhindered access. It is a bit difficult to see the boundaries and if there is any private land that needs crossing on the maps we have access too.

#### **Access provisions for Godley River valley:**

The proposed control of “traffic”, for the lack of a better description, wishing to use the farm maintained track around the lake edge is the only practical solution if stock, vehicles and personnel are to traverse that area safely. I support the proposed control signage and structures to be installed. However, it is unclear if any vehicular access is to be permitted. It is likely the lake edge can be traversed by motorised vehicles such as motorcycles and Quads with little impact. I would like clarification that these vehicles can then access the farm track around the lake to continue into the Godley River Valley. There is a large part of the year that the Godley River is unsafe to cross and I am sure users will wish to utilise other methods to gain access to the upper valley. Closure of the route in winter is sensible and necessary but travel outside of that period should not be denied unless the track is impassable or proven significantly dangerous.

#### **Freehold tenure of Godley River Flats:**

Clearly significant investment has been made by the station in fencing, fertiliser and seed to enhance the production of the river flats. The area of Red Tussock to be protected appears to be healthy under the current regime and as long as that is assessed as part of the ongoing oversight I accept that arrangement. In time it would be advantageous to have that area fenced off but that



requires investment and that would need to come entirely from the crown. With regard to further development of that area I have reservations about removal of Matagouri as it will permanently alter the visible appearance of the area. I would suggest further analysis of the impacts of the clearance of native vegetation be undertaken. It may well be that when viewed from the LilyBank side of the river the distance and topography will mask the change in appearance.

I strongly encourage further fencing to be undertaken to isolate grazed areas from the river bed itself taking into account the difficulty of predicting the movements and erosion in a braided river system.

Access across these lands is provided for in a public easement that follows the farm track. The Stations concern over the positioning of that easement is well founded with regard to their own hut and the John Scott School facility located alongside. I'm not convinced that is necessary and putting the easement out beyond the fenced area alongside the river is probably a better solution that will prevent any issue. If that is to be done the easement would leave the farm track at the first fence and travel out to the rivers edge and continue up from that point. It could then rejoin the farm track at the point just above where CC1 is marked on the map.

At about that point an additional access point up one of the creeks, utilising a marginal strip, to the higher lands should be provided. Whilst Pollock Stream will provide legal access further upstream I feel an additional access point is needed to both avoid trespass issues and enable reasonable access to the higher faces for hunters, climbers and walkers. The area across that face is 8km long across rough ground and I think it would be prudent to provide a legal access as it is an area likely to see quite a lot of interest. In light of the poor access provided across LilyBank Station to the Erebus faces and Sibbald range I believe additional access must be provided.

Further upriver I see no issues although usage of the easement along the farm track may see a level of conflict if visitors are ignorant of farm operations in the valley. I would strongly encourage a noticeboard online be used to keep visitors up to date with any operations taking place in the valley. One of the existing outdoor groups, FMC, NZDA may be able to provide resources for that and if it could be updated via text or email it should be a small burden to the landholder.

#### **Cass River and Mistake Valley:**

It is clear the farm track is unsuitable for uncontrolled access to the Mistake Valley. Not only from a safety point of view but also from a soil stability and farm management angle. While I agree with restricting that route to Conservation Purposes only and any other access being at the discretion of the land holder I do desire better access for Mistake Valley. While at the station we viewed points the access provision would provide and while usable they are not as good as they could be.

There is an existing legal road that travels along the ridge above the river on the south side. It provides a suitable gradient that most could manage before entering the Mistake Valley Public Conservation Land. The station Manager thought the next spur further toward the Cass river provided even better access so I believe a better route should be negotiated. In lieu of the legal road a poled route should be provided from just above the homestead, beginning on the Cass River track that leads across the private land up that spur to the boundary fence on the south side of the Mistake valley. There are other examples of this type of access such as Peak Hill at Lake Coleridge that appear to work very well and only require closure at lambing if stock are being lambed in that country. Ideally I would prefer four wheel drive access to the valley but I would accept this as an alternative given we are unlikely to get funds to develop a new track to enable four wheel drive access.

I support provision of a car park and route along the boundary fence into the Cass River. I am sure that will provide a good secure place to leave vehicles and enough space that all can be accommodated from longer term visitors to day walkers.

Sincerely,

Craig W Benbow

## Submission 11



22 December 2015

Commissioner of Crown Lands  
Land Information New Zealand  
Crown Property and Investment  
Private Bag 4721  
**CHRISTCHURCH**

## **Preliminary Proposal for Tenure Review of Godley Peaks Pastoral Lease Submission from the Walking Access Commission**

Thank you for the opportunity to comment on the Preliminary Proposal for the tenure review of the Godley Peaks pastoral lease.

The Commission's public access statutory role is described below, under section **A. Introduction**, and the detailed submission is presented in section **B. Submission**.

In summary, the Commission;

### **Notes**

- *the Godley Peaks pastoral lease is in one of New Zealand's pre-eminent tourist and recreational areas*

### **Supports**

- *the creation of an easement up the Cass River valley ('c-d'), and*

### **Seeks**

- *to have the terms of the easement 'c-d' changed to allow public access accompanied by horses;*
- *to have the first sentence of clause 16 of the public access easement document modified to clarify the duration of any closure of the Easement Area marked 'a-b' relates to the period that stock are on only that section of the easement*
- *to have public 4x4 vehicle access, and access accompanied by horses, provided to the Mistake River valley in CA1;*
- *to have public 4x4 access, and access accompanied by horses, provided from the Cass River to the northern extent of land proposed to be designated as freehold;*
- *to ensure public access to CA1 is secured along the Mistake River, Ribbonwood Creek, Pollock Stream, Kea Gully, and Manning Stream, if public access is not already available;*
- *to have Crown Land (identified in this report as 'Z-Y' on Map 2) set apart for roading purposes, and*
- *to have a declaration from Land Information NZ whether the current vehicle track from the Cass River Bridge to the northern boundary of the pastoral lease also defines the legal road alignment.*

## **A. Introduction**

### **Purpose, Objective and Functions of the NZ Walking Access Commission**

The Walking Access Act 2008 (WA Act) (sections 3, 9 and 10) sets out the purpose, objective and functions of the NZ Walking Access Commission.

The Commission is the Crown agency with statutory responsibility<sup>1</sup> for leading and supporting the negotiation, establishment, maintenance, and improvement of –

- walking access (including walkways, which are one form of walking access) over public and private land; and
- types of access that may be associated with walking access, such as access with firearms, dogs, bicycles, and motor vehicles.

Central to its role is the negotiation and provision of free, certain, enduring and practical access to the outdoors for New Zealanders and visitors.

### **Focus of Submission is Public Access**

The Commission's submission on the Preliminary Proposal for Godley Peaks is designed, as envisaged by the WA Act, to achieve free, certain, enduring and future-focused public access in this area of New Zealand.

The Commission's submission reinforces the objectives of the Crown Pastoral Land Act 1998 (CPL Act), in particular section 24(c) which is to make easier the securing of public access to and enjoyment of reviewable land. Specifically, our submission addresses the public access and public enjoyment matters specified in subsection (2) (c) and (d) of section 40 of the Crown Pastoral Land Act 1998 Act (Protective mechanisms).

This submission is aligned with Land Information New Zealand's (LINZ) Statement of Intent 2015-2019 and will help achieve the outcomes relating to:

- location information – unlocking the potential of 'where' (pages A5 and B3), and
- Crown Property – ensuring that the best economic, environmental and recreational uses are being made of Crown-owned and Crown-used land (pages A5 and B15).

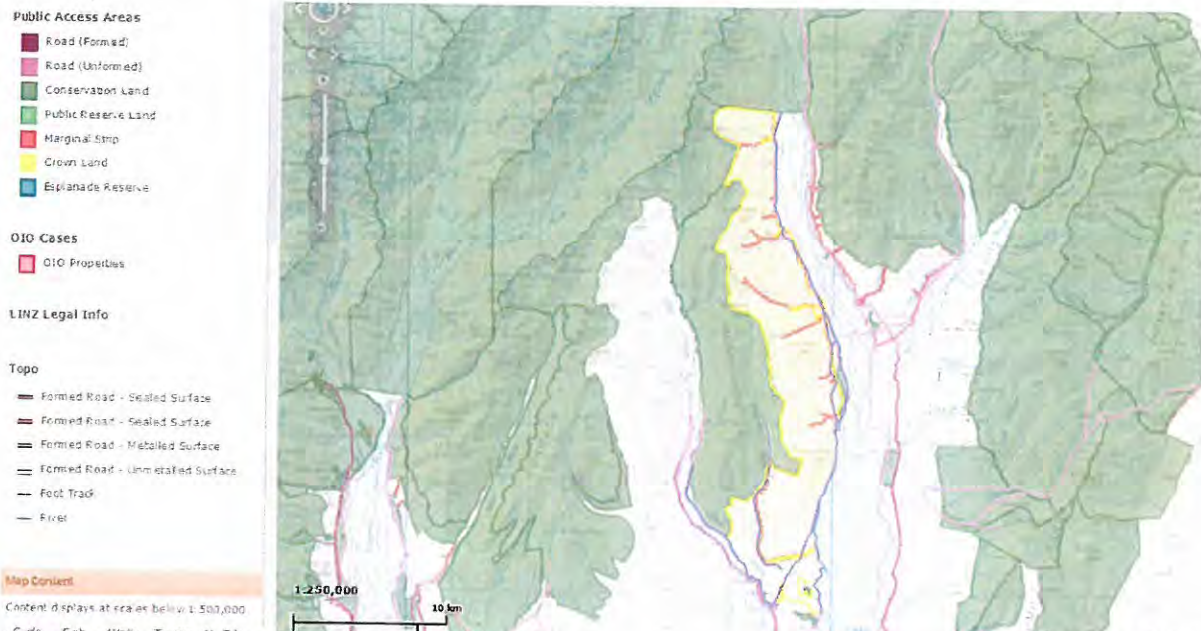
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<sup>1</sup> Section 3(b) Walking Access Act 2008

## B. Submission

### Context

The Godley Peaks pastoral lease, approximately 15km north of Lake Tekapo Township, is situated in an area of outstanding natural beauty and is highly regarded and valued for recreation and tourist potential.



Map 1 Godley Peaks pastoral lease coloured yellow  
[www.wams.org.nz](http://www.wams.org.nz)

(source)

The Godley Peaks pastoral lease, shown yellow in Map 1 above, is on the west side of Lake Tekapo, and is bounded to the north east and south west by the renowned Godley and Cass Rivers.

This high profile tourist and recreational area requires public access outcomes to be afforded very high priority and this needs to be appropriately addressed by the Crown - the guardian of access to the outdoors in New Zealand.

From the Cass River Bridge to Lake Tekapo and northwards to the northern end of the pastoral lease there is a vehicle track that runs along, adjacent and generally parallel with the legal road as depicted on LINZ maps. During the significant public works carried out in the Waitaki Basin and with the Commissioner of Crown Land's approval for development of the pastoral lease, the intent will have been for road construction to be on the alignment of the legal road as depicted on old survey and topo maps.

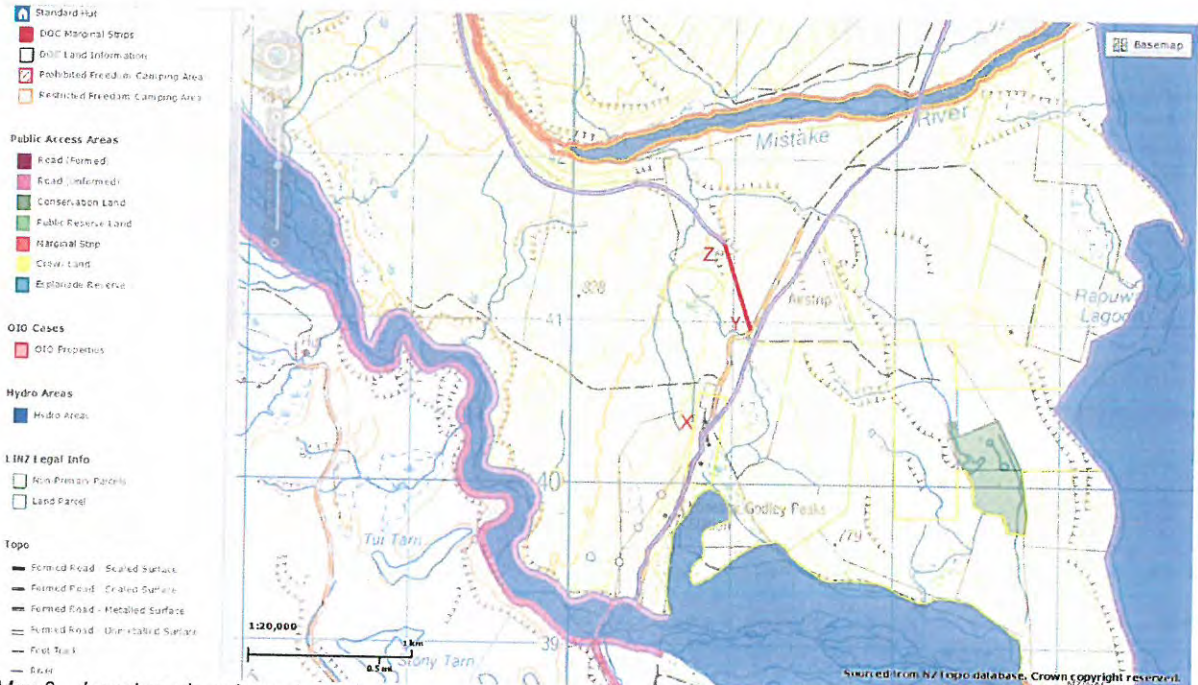
The Commissioner of Crown Land is, therefore, asked to confirm that the alignment of the existing and legal road was intended. It is critical that this tenure review ensures free, certain and enduring public access from the Cass River Bridge to the northern end of the pastoral lease is via legal road.

### Existing public access

The Godley Peaks Road provides legal public access to the property. To the east, the property is bounded by legal roads adjoining Lake Tekapo and the true right bank of the Godley River, and to

the south by the legal road along the true left bank of the Cass River. The legal roads are shown coloured purple in the maps below.

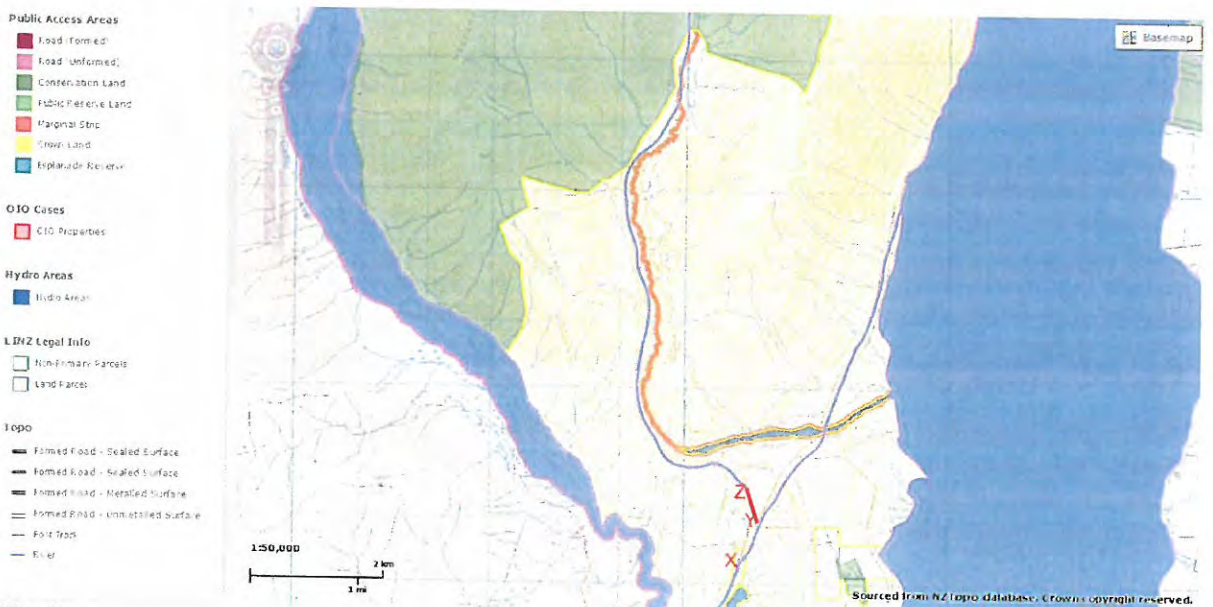
From the Cass River Bridge to the homestead (area shown 'X' on Map 2) the formed road is on the legal road alignment. From the homestead area northwards the legal road alignment in Land Information New Zealand's (LINZ) record and the existing vehicle track are in close proximity but not coincident, as shown in Map 2 below.



Map 2 Legal roads coloured purple

(source [www.wams.org.nz](http://www.wams.org.nz))

The legal road (unformed) running from the conservation area south-eastwards along the Mistake River ends at point 'Z', approximately 600m short of Godley Peaks Road (vehicle track) - see Map 3 below.



Map 3

(source [www.wams.org.nz](http://www.wams.org.nz))

There is a bridge where the Godley Peaks Road (vehicle track) crosses the Mistake River – shown 'W' on Map 4 below. The legal road alignment and the physical track are in close alignment at this point but are not shown coincident in the LINZ maps.



Map 4

The Godley Peaks legal road (vehicle track) continues northwards to the Godley River and is in close proximity to the existing track until approximately 1.5km south of the northern boundary when the legal road deviates north eastwards into the riverbed – see Map 5 below.



Map 5 Legal road deviates away from property at northern boundary

## Proposed public access

The Preliminary Proposal provides for an easement in gross over proposed freehold land, to enable public access (foot or by non-motorised vehicle) up the Cass River valley ('c-d') and the Godley River valley ('a-b-n', 'o-p' and 'q-r'). The section of easement 'a-b' is proposed to be able to be closed for no more than 4 hours for stock management purposes, being the droving of stock along this physically narrow route.

The proposed creation of a conservation area in the Cass river bed (CA2) should facilitate public access of and through the area, although the extent and types of public access are not specified. The creation of a recreation reserve strip along most of the lease boundary towards Lake Tekapo should also facilitate public access but, again, the extent and types of public access are not specified.

The proposed creation of conservation area over the upper eastern faces of Halls Range (CA1) should facilitate public walking access in that area.

Public access will be available along the proposed marginal strips that will adjoin the Mistake River, most of Rankin Stream and parts of Sutherland and Ribbonwood Creeks, and Pollock and Manning Streams.

No public access is provided for along existing formed tracks through the property to the Mistake River valley, and towards the Godley River valley where an easement ('e-f', 'g-h' 'g-i', and 'j-k') for conservation management purposes only is proposed (including vehicles), and no public vehicle access is provided for where conservation management vehicle access is proposed on an easement ('a-b-n', 'o-p' and 'q-r').

## **Recommendations**

The Commission *supports* the creation of practical public access by an easement up the Cass River valley ('c-d').

The Commission *recommends* that the terms of the easement be changed to allow access accompanied by horses. There is no obvious reason why access with horses should be excluded on this route and horse trekking is an increasingly popular recreation activity.

The Commission *notes* that special easement term 16 in the proposed public access easement, enables the landholder to close the easement section 'a-b' for stock-shifting purposes. The Commission understands that the landholder is able to close this section only when stock are being shifted along that section of the easement 'a-b' only. The Commission proposes the special condition to be modified to ensure that this intention is clear. The Commission *recommends*, therefore, that the first sentence of clause 16 of the easement document be modified to read: "*The Grantor may close that part of the Easement Area marked "a-b" for stock management purposes, but only while droving of stock along that part of the easement area 'a-b'...*"

The Commission *notes* that there is no public access proposed directly into the upper Mistake River valley, which is likely to be one of the main destinations for hunters, in particular. There is no reasonable public access route identified to facilitate public access into the Mistake River valley and the only option proposed is to use the Cass River valley easement ('c-d') and then, somehow, traverse through CA1 to the Mistake River, a distance of some 8-9 km. The last 3km of this route would be only for walking access and would not be easy, and it would only position hunters at the conservation area boundary. More direct and varied public access is warranted into the Mistake River valley. The Commission *recommends* that public 4x4 vehicle access and public access accompanied by horses, be provided to the Mistake River valley in CA1.

The Commission *notes* that there is no public vehicle access proposed into and up the Godley River valley. This valley has long been an area of high recreational interest and it is an entry point to public conservation land and Mount Cook National Park. Traditional activities have included hunting, tramping and climbing and the area will also be of increasing interest to mountain bikers and horse riders. The estimated distance from the Cass River to Rankin Stream near the northern boundary is approximately 35km, and the Conservation Resources Report indicates that access by 4x4 takes some 2-3 hours. The Preliminary Proposal provides for only walking and mountain bike access.

The Commission *recommends* that public 4x4 access be provided from the Cass River to the northern extent of land proposed to be designated as freehold. This should be such a fundamental outcome from a review of the tenure of Godley Peaks pastoral lease, that if such access cannot be achieved, then the proposed review would be so deficient in meeting the objects of section 24 (c) (i) Crown Pastoral Land Act 1998 (the securing of public access to and enjoyment of reviewable land) that the review should not proceed.

The Commission *notes* that the Qualifying Water Bodies report for Godley Peaks, dated 4 May 2011, assessed that there would be marginal strips from the Godley River to the proposed conservation boundary on the following waterbodies: Mistake River, Ribbonwood Creek, Pollock Stream, Kea Gully, and Manning Stream. While marginal strips on these water bodies are now recorded in the cadastre (on SO 480621), it is difficult to determine from the Designations Plan whether or not the proposed boundary of CA1 does, in fact, extend to at least the limit of the marginal strips. The Commission *recommends* that, if public access to the proposed CA1 is not already provided for along the Mistake River, Ribbonwood Creek, Pollock Stream, Kea Gully, and Manning Stream, then public access be secured along these water bodies.

The Commission *recommends* that the existing legal road from the conservation area that runs along the Mistake River be extended to join the current legal road as shown on Map 2 above. This would require setting apart that length of Crown Land 'Z-Y' for roading purposes. This will ensure



the integrity of the unformed roading network into the future.

Notwithstanding the above recommendations, the Commission *recommends*, in parallel with its tenure review process, that LINZ investigates the legality of the road from the Cass River Bridge, to and along Lake Tekapo and along the Godley River, through to the northern boundary of the pastoral lease and to confirm whether the existing track in the vicinity of the legal road actually represents the legal road true alignment.

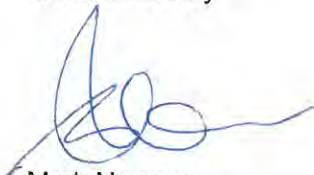
## Conclusion

*The Commission:*

1. **Supports** the creation of an easement up the Cass River valley ('c-d'), and
2. **Seeks** to have the terms of the easement 'c-d' changed to allow public access accompanied by horses.
3. **Seeks** to have the first sentence of clause 16 of the public access easement document modified to read; "The Grantor may close that part of the Easement Area marked 'a-b' for stock management purposes, but only while droving of stock along that part of the easement 'a-b.'"
4. **Seeks** to have public 4x4 vehicle access, and access accompanied by horses, provided to the Mistake River valley in CA1.
5. **Seeks** to have public 4x4 access, and access accompanied by horses, provided from the Cass River to the northern extent of land proposed to be designated as freehold.
6. **Seeks** to ensure public access to CA1 is secured along the Mistake River, Ribbonwood Creek, Pollock Stream, Kea Gully, and Manning Stream, if public access is not already available.
7. **Seeks** to have Crown Land (identified in this report as 'Z-Y' on Map 2) set apart for roading purposes
8. **Seeks** to have a declaration from Land Information NZ whether the current vehicle track from the Cass River Bridge to the northern boundary of the pastoral lease also defines the legal road alignment.

Thank you for the opportunity to make a submission on the Preliminary Proposal for tenure review of the Godley Peaks pastoral lease.

Yours sincerely



Mark Neeson  
Chief executive

## Submission 12



## Canterbury Aoraki Conservation Board

### Te Poari Kaupapa Atawhai ki te Rohe

P O Box 5, Aoraki/Mount Cook 7946

Tel: (03) 4351185 Email: sslatter@doc.govt.nz

20<sup>th</sup> December 2015

Commissioner of Crown Lands  
Land Information New Zealand Crown Property  
CBRE House, 112 Tuam Street  
Private Bag 4721  
CHRISTCHURCH 8140

#### Review Under Part 2 Crown Pastoral Land Act: Godley Peaks Pastoral Lease

The Canterbury Aoraki Conservation Board has received the preliminary proposal for tenure review of the Godley Peaks pastoral lease and wishes to submit on the following points.

1. Public non motorized access has been provided along with motorized Department of Conservation access for management and monitoring purposes. Due to the nature of the terrain access may occasionally be limited but the easement terms between both parties in this agreement appear to be conciliatory. We would like to submit that if the existing access needs to be shifted considerably by the landholder, this access will continue to be made available for management and monitoring purposes.
2. We require an extra fencing requirement for a robust fence between "r" (Angus Hut) and the Godley River, if one at present does not exist. This would create a necessary boundary and prevent stock moving further North into CA1.
3. CC1 Schedule 2 Special Conditions, We submit that the Minister will (replacing *may*) design and undertake a monitoring programme. a. to ensure the ecological integrity of the land is maintained and b. to enable the monitoring of any effects on the vegetation cover and conditions, faunal values and any other values of the land. As per Schedule 3 which sets out the parties respective responsibilities for undertaking monitoring, meeting costs, methods to be used and information requirements. We also submit that Schedule 3 is titled "Description of the Monitoring Programme to be Established" (omitting the word *Possible*) . 1. An indigenous vegetation monitoring programme will be established.....etc. (replacing the word *may* )

In general terms we regard the proposal as satisfactory with regard to meeting many of the conservation and recreation needs of that part of the MacKenzie Basin occupied by PT017 Godley Peaks Station.

A handwritten signature in black ink, appearing to read 'Helen Ivey', written in a cursive style.

**Helen Ivey**

**Chairperson Tenure Review Committee**

**Canterbury Aoraki Conservation Board**

## Submission 13

**From:** Martin Robertson [mailto:martinrobertson.nz@gmail.com]  
**Sent:** Wednesday, 23 December 2015 12:19 p.m.  
**To:** pastoral & tenure review  
**Subject:** Godley Tenure Review

Commissioner of Crown Lands  
Land Information New Zealand Crown Property  
CBRE House, 112 Tuam Street  
Private Bag 4721  
CHRISTCHURCH 8140

Please find following my submission on the tenure review.

I have viewed the pdf images of the proposal and make the following comments

1 Tenure review is the time to secure public access and the proposal doesn't adequately allow for public access.

2 The land swap and gifting the area noted as CC1 to the station will close out public access to the main streambeds from Crown area CA1 to the Godley Riverbed this should be revised.

2. Access across station land being via road shown from point a to Cass river bridge should remain public access.

3. Public access to be ensured by easements on all streams from Crown area CA1 into the Godley riverbed.

4. 4x4 driving access from Cass river bridge via station tracks in route generally e to h should be retained for hunting and recreational access.

I make these requests as a hunter concerned about the public estate being locked up and facilitating essentially exclusive hunting rights on public land by restriction of public access.

There is a huge demand for hunting access and hunter numbers are growing. By adopting my suggestions the public interest will be maintained.

Regards Martin Robertson

10 Samoa Street Kilbirnie  
027 279 9209

## Submission 14



23 December 2015.

Commissioner of Crown Lands  
Land Information New Zealand  
Christchurch.

Dear Mr Gullen,

**Re: Tenure review of Godley Peaks Crown pastoral lease**

Federated Mountain Clubs (FMC) was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of 20,000 members. This core function gives FMC a strong interest in Crown pastoral tenure review as the process allows leasehold land to be redesignated for new purposes including conservation and recreation.

The prioritised objects of the statute enabling tenure review, Part 2 of the Crown Pastoral Land Act 1998, are of particular significance to FMC due to our organisation's interest in natural and historic values and recreation access. The objects are:

**Section 24**

*(a) to-*

*(i) promote the management of reviewable land in a way that is ecologically sustainable*

*(b) to 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.,*



and the following object:

*(c) subject to paragraphs (a) and (b), to make easier-  
(i) the securing of public access to and enjoyment of reviewable land.*

Additional objects, to enable reviewable land capable of economic use to be freed from the management constraints (direct and indirect) resulting from its tenure under reviewable instrument, and the freehold disposal of reviewable land, must also be considered, though their priority is not as high as those of (a)(i), (b)(i), and (b)(ii).

## **Godley Peaks**

At the northwestern tip of Lake Tekapo between the Cass and Godley valleys, this 14,493ha, approximately 33km-long property ranges from around 720m elevation at the lake's shore to 2,430m elevation at Mt Radove. Its northern end is just 10km from the main divide.

It is primarily steep and mountainous country, and the glacial Godley Valley, forming most of the eastern boundary, is a notable feature. The property's natural values are relatively intact and the farming operation is productive, with low plant and animal pest numbers.

The objects of Part 2 of the Crown Pastoral Land Act 1998 and their hierarchy form the foundation for observations and recommendations in this submission on the Godley Peaks preliminary proposal.

## **Proposed CA1**

### Significance

This extensive proposed area - more than 10,000ha - contains a large range of significant natural values. For example, totara and threatened *carmichaelia* species, diverse aquatic macro-invertebrates, avian invertebrates of outstanding significance, and areas of high natural value to lizards and avian wildlife for breeding, exist in a landscape of mostly high coherence, legibility, intactness, and naturalness.

Protection by restoration to full Crown control is consonant with the Act's requirements due to the natural values' strength of significance. High quality natural values extend beyond the proposed CA1 boundary, however, and this proposed public conservation land will need expansion eastward to the property's boundary on the Godley River and southward to the Mistake River in order to meet the statute's protective requirement. This will be discussed further throughout the submission.

### Concessions

FMC understands that commercial recreation concessions proposed will ease the property's transition between the former large leasehold and new smaller freehold farm management regimes after review completion. However, they are unduly demanding in terms of their 10-year duration and, in the case of the proposed guided activities concession, in terms of client numbers. Five-year durations and more modest client numbers are reasonable given that the land in question is proposed to be reserved for public conservation purposes.

The proposed 30-year concession for facilitation of telecommunications should be adopted.

### Public recreation access and enjoyment

Proposed public recreation access is impracticable due to its length and non-motorisation; it is access in name only, not actuality, and will not satisfy the Act's requirement of 'to make easier- the securing of public access to and enjoyment of reviewable land'. To genuinely address this requirement, provision for public access will need to be the same as provision for conservation management and concessionary access. As this matter relates to several proposed designations, it will be discussed in other parts of this submission also.

### Recommendations:

- \* that proposed designation CA1 be adopted.*
- \* that proposed CA1 be extended eastward to the property's Godley River boundary and southward to the Mistake River to protect significant inherent values.* Note: this will be discussed further throughout the submission.
- \* that proposed commercial recreation concessions' duration be reduced to five years and that client numbers be reduced.*
- \* that the proposed telecommunications facilities concession be adopted.*
- \* that provision for public recreation access be the same as provision for conservation management and concessionary access.* Note: proposed public recreation access to CA1 and other parts of the property is discussed elsewhere in this submission.

### **Proposed CA2**

#### Significance

There is significant natural landscape value in this proposed 172ha block which is situated at the bottom of the lease. Lizard habitat, fish habitat, and habitat diversity generally are noted here also, but significance is overstated in the preliminary proposal, and, while FMC does not oppose adoption of CA2, the block could be disposed of as freehold with a conservation covenant over the full area and meet the Act's requirements.

### Public recreation access and enjoyment

Public recreational access should be provided, to meet the statutory requirement; this could be either through Crown retention and control of the land as CA2 or by establishment of an easement to link with proposed RR should the land be disposed of as freehold with a protective mechanism.

### Recommendations:

- \* that protection for proposed CA2 be put in place, either by adoption of the proposed designation, or by disposal as freehold with a conservation covenant over the full area.*
- \* that public recreational access be provided either by adoption of CA2 as proposed or by creation of an easement to link with proposed RR if the land is disposed of as freehold with a conservation covenant.*

### **Proposed RR**

The intention of this proposed 27ha, 50-metre-wide strip running alongside Lake Tekapo between the proposed freehold block and the lake foreshore is provision of public access and enjoyment. It will also ensure protection of lizard habitat and of the lake shore's natural appearance.

Elsewhere in this submission, FMC proposes CA1's southward extension, which will reduce the necessary extents of proposed RR and its fencing. FMC has also discussed the potential for proposed CA2 to be redesignated as freehold with a conservation covenant and access easement, which would affect the dimensions of proposed RR.

Provision should be made for compensatory land contributions from the adjacent property to be made should proposed RR be physically compromised by natural or other processes.

### Recommendations:

- \* that proposed RR be adopted, length and fencing extent to be dependent on other designations' final boundaries.*
- \* that compensatory land contributions be provided for in the event of RR's physical compromise.*

### **Proposed freehold**

This parcel of 3,665ha largely comprises Godley Peaks land most intensively developed as pasture and is in general an appropriate proposal.

### Significance

As briefly noted in the above discussion about proposed CA1, however, high - some 'outstanding' - natural values in the area proposed for freehold will need the protection of Crown ownership and control, as 'preferred' by the Act, which is appropriate for such significance.

The Godley Wetland Site of Special Wildlife Interest is of 'outstanding' value to wildlife and has recorded several significant species including the black stilt and the wrybill.

All the Godley River's slow descent streams, springs, and associated catchments within the property contain habitat diversity and significant macro-invertebrate diversity and support rare species.

The Big Rough, between the Godley River lease boundary and the 1,100m contour, contains invertebrates of high significance.

Tall matagouri, representative of the original, exists on Pollock and Sutherland Streams' debris fans.

The lower Mistake River has 'declining' coral broom and diverse invertebrate fauna, and the Mistake River Swamp is a Wetland of Ecological and Representative Importance, with a range of habitats. Highly significant shrubland invertebrate habitat exists from 800m up the Mistake.

Due to high levels of natural significance, parts of the property proposed as freehold area - to the eastern boundary on the Godley River, south to the lower reaches of the Mistake River and from there, in a line to the western boundary - should be redesignated for public conservation purposes, not freehold, in order to meet the statute's protective requirement. The proposed freehold area should, excepting proposed RR, run from the described east-west Mistake River mouth-Cass River line, to either the top or the bottom of proposed CA2, depending on that block's final status.

#### Protective mechanisms

Proposed covenanted area CC1, a 13km-long strip in the property's middle reaches along the eastern boundary, is insufficient for the genuine protection of identified natural values and should be removed from the proposal.

Proposed CC1 should be designated as public conservation land; a five-year grazing concession over the same proposed area could be offered to the holder.

An outwash above the homestead should be protected by covenant, to be designed by those with expertise in landscape significance.

#### Public recreation access and enjoyment

Proposed public recreation access will need alteration to 'make easier- the securing of public access to and enjoyment of reviewable land'.

A proposed easement for non-motorised public access and conservation management adjacent to the Cass River is reasonable (note that a reduced length will be needed in the likely event of southward expansion of proposed public conservation land into the proposed freehold for Crown

protection of natural significance). But the only other provision of public access to proposed CA1 - via proposed CA2 and proposed RR, discussed earlier - is also non-motorised and also on the property's margin.

As it stands, this proposal for public recreational access represents access in words only and is inadequate to meet the Act's requirement. It is so lengthy and indirect that many recreationists with typically limited time and resources will be unable to reach their objectives; it needs to be more enabling and it needs to better address the diverse interests and abilities of public recreational users.

There are means of addressing these matters and of providing an access network to suit a recreational range. Firstly, high natural significance in the proposed freehold area means proposed public conservation land boundaries will have to shift eastward and southward, allowing public roaming to begin earlier. Secondly, poled foot access from 'c' along existing legal roads up the Mistake River and also northeast across the proposed freehold to Lake Tekapo should be established; this will necessitate small additions to present roads. The Mistake's public recreational access requirements will be addressed alternatively or additionally by re-forming the existing old bulldozed track up the valley. Fourthly, public recreation access should share conservation management and concessionary access, a solution that appropriate fencing and gate provision make practicable.

FMC is confident in its view that natural significance identified in parts of the proposed freehold and discussed in this submission mean Crown ownership and control is the only possible designation for these areas; this will significantly enhance public recreation access opportunities. If the freehold area were formed as proposed, however, full public non-motorised access along easements proposed for conservation management purposes should be formalised for weekends and public holidays, and the track through proposed CC1 should be re-formed on stable ground to increase its distance from existing huts.

FMC supports easement creation where existing vehicle tracks do not align with legal road or lakeshore land outside the lease boundary.

**Recommendations:**

- \* that the proposed freehold be adopted with the following area: all land bounded by an east-west line along the lower Mistake River continuing to the property's western boundary, down to either the top or the bottom of proposed CA2 depending on that proposed area's final designation, and from the property's western boundary across to the western edge of proposed RR.***
- \* that proposed CC1 not be adopted.***
- \* that a five-year grazing concession offer be considered for the area proposed as CC1.***
- \* that an outwash above the homestead be protected by covenant as discussed above.***
- \* that diverse provision for public recreation access be created: sharing conservation management and concessionary access; poled foot access along completed legal roads***

- as discussed: and by re-forming the existing old bulldozed track up the Mistake valley as access additional to or alternative to the Cass River track proposal.*
- \* that, should the proposed freehold area be formed according to the preliminary proposal, full public non-motorised access along easements proposed for conservation management purposes be formalised for weekends and holidays, and that the track through CC1 be re-formed on stable ground to increase distance from existing huts.*
  - \* that, where needed, easements be created if existing vehicle tracks do not align with legal road or lakeshore land outside the lease boundary.*

## **Land classification**

This review of Crown pastoral leasehold tenure should 'enable the protection of the significant inherent values'. As part of the review, all property to become public conservation land should be given final classification based on the expert data that have informed the review.

FMC supports the proposal of recreation reserve classification for RR because it means that access and enjoyment, and natural values' management and protection, are prioritised, in that order.

Other parts of the property proposed for protection due to natural significance will receive stewardship classification regardless of the currency of the data on their values. Such classification does not ensure protection through appropriate management and does not provide protection from exchange (Section 16A(1) of the Conservation Act 1987 says: *Subject to subsections (2) and (3), the Minister may, by notice in the Gazette, authorise the exchange of any stewardship area or any part of any stewardship area for any other land*); precise classifications will address the Act's requirement that the review 'enable the protection'.

### **Recommendation:**

- \* that all public conservation land created by this tenure review be specifically classified as part of the process.*

## **Conclusion**

For Godley Peaks' tenure review preliminary proposal to meet the statute's demands of promoting sustainable management and enabling protection of significant inherent values, improved protection for identified natural values is necessary.

Proposed public recreational access and enjoyment provisions will need to be more direct, diverse, and expeditious to be consonant with the Act's requirement.

Significant inherent values' protection on public conservation land is uncertain unless the land has specific classification. Technical data produced to support the tenure review should be used to help the review meet the Act's requirement of protection for significant natural values by informing specific classifications for parts of the property to be redesignated for public conservation purposes.

If the Act's objects are unable to be met, the tenure review may be discontinued (Section 33 of the Crown Pastoral Land Act 1998 says: *The Commissioner may discontinue a review at any time; and must discontinue a review if asked in writing by the holder, or one of the holders, concerned.*).

Yours sincerely,

Phil Glasson,  
FMC secretary.

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## Submission 15



**From:** Graeme Williams [mailto:kotare57@gmail.com]  
**Sent:** Wednesday, 23 December 2015 1:43 a.m.  
**To:** pastoral & tenure review  
**Subject:** Godley Peaks Tenure Review Submission.

Graeme Williams  
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### Submitted Changes to the Proposal

I would like to submit that, for the Tenure Review process to proceed, the following access provisions must be included: access, and for the carriage / carrying of firearms. If this is not acceptable, as an alternative that access could be provided for members of approved clubs or organizations, ie New Zealand Deerstalkers Association ( NZDA )  
4x4 vehicle access up the true right hand side of the Godley from the end of the public road to Rankin Stream;  
the narrow strip of land in CC1, up the banks of the Godley River SHOULD NOT be designated as freehold .  
If it is to be freeholded, then public access must be secured along the Mistake River, Sutherland's Creek, Little Hogget Stream, Ribbonwood Creek, Pollock Stream, Kea Gully, and Manning Stream, if public access is not otherwise provided by marginal strips;  
the first sentence of clause 16 of the public access easement document should be modified to clarify the reason for any closure of the Easement Area marked 'a-b' – and such reasons should provide for as little public access restriction as possible (including period of closure – for example, any closure for lambing should be for a period not to exceed 6 weeks);  
there should be public 4x4 vehicle access from the public road end, provided to the Mistake River valley in CA1.

### PROPOSED “NEW DRAFT SECTIONS”:

#### 6. Godley Peak Public Access – T R proposed

Access onto Godley Peak pastoral lease land has, in recent years, only been possible by invitation or the payment of fees, either for hut hire and/or road access. As a result few recreational hunters have experience of the access situation along the southern faces of the Hall Range, or the station track between the ‘home block’ and the ‘Godley River bank block.’ It is acknowledged that the station has agreed to allow the public conditional use of their track/road around the Tekapo Lake edge to the lower Godley riverbank by Sutherland Creek.

6.1 .It is understood this lake-side road/track of approx six kilometres is virtually closed during most of the winter months due to snow conditions across the hillsides above. During such time it is often possible however to cross the Godley river, due to very low winter flows in the river braids, and hence provide recreational hunter access from the Lilybank (north) side.

There will also be times when this track will be used to shift stock back to the homestead facilities for management/stock health purposes, preventing non-farming use.

6.2. With 4 x 4 vehicle tracks up this south bank of the Godley being mainly on the proposed freehold land a new public 4 x 4 access route will need to be found/formed in the Godley riverbed, along some sections.eg: between n-o and p-q on map sheet 1 .

6.3. The gap in the freehold land strip beside the Godley river at Pollock Stream appears to provide the only public access to the mountain faces, from the top of Lake Tekapo and Angus Flat where the property ends. This is a distance of approx. fifteen kilometres.

6.4. Mistake river valley 4 x 4 access through the station is apparently very difficult and often is impassable after adverse weather. There is apparently a 'paper road' up the Mistake riverbed to the Middle Gorge hut but its route is impractical. Although the Dept of Conservation has arranged for vehicle access for management purposes towards the Mistake valley (g-i, g-h) there is no public access indicated. The hut in the mid Mistake valley was upgraded by DOC but it appears to get little hunter use as the upper valley vegetation and terrain seems unattractive for holding tahr all year round. Access has been mainly via helicopter from the end of the Lilybank Rd.

6.5 Cass river access via Godley Peaks property apparently effects a very small section until the 4 x 4 vehicles can access the riverbed proper, but it is a popular recreational hunting area that requires permanent hunter access for wild animal control. It is accepted that Glenmore Station has the better access country to the Cass riverbed.

6.6 There appears to be no fences required to keep the Godley Peaks stock from encroaching onto public lands, returned to the Crown, along the 15 kilometres of the Hall Range faces, backing onto the this proposed strip of freehold grazing land.

6.7 The provision of a tourism concession to the owners of Godley Peaks, is rather vague but I assume this will include guided hunting and possible AATH activity over the whole of the Hall Range. Recreational hunters are opposed to AATH as this unethical activity often ruins any recreational hunting occurring in the sound distance of the helicopter.

Guiding hunting on public land has no priority over public recreational hunting. With the Hall range faces coming back to full public land status above the 1,000m contour we would like to see some oversight on this possible conflict between this commercial activity and public recreational hunting on public land.

This may need to be referred to the Game Animal Council for oversight and recommended guidelines.

## 7.Submitted Changes to the Proposal

The access ways to hunting areas must allow for the carriage / carrying of firearms.

There should be a general provision for 4 x 4 vehicle access up the true right hand side of the Godley river from the end of the public road to Rankin Stream, outside the winter period, and for

those periods where the track/road is not being used for programmed farm management purposes.

A reasonable annual lake-side road-use timetable, and some access/maintenance fees should be negotiated between the station owners and the New Zealand Deerstalkers Assn or another nominated registered hunting body, for the purpose of public notification.

The first sentence of clause 16 of the public access easement document should be modified to clarify the reason for any closure of the Easement Area marked 'a-b' – and such reasons should provide for as little public access restriction as possible (including period of closure – for example, any closure for lambing should be for a period not to exceed 6 weeks)

I recommend that the narrow strip of land in CC1, up the banks of the Godley River to Angus Flat SHOULD NOT be designated as freehold as there seems to be little or no control over stock without fences along this riverbank, and would be better used under a grazing licence with a specified renewal period that allows LINZ to review the appropriateness of grazing stock along a narrow, 15km long strip, of riverbank based on the impacts on the adjacent Crown conservation lands.

If however this riverside land CC1 is made freehold, then public walking access should be secured to the Mistake River, Sutherlands Creek, Ribbonwood Creek, Pollock Stream (as indicated in the Proposal), Kea Gully and Manning Stream (as depicted on the Proposal drawing sheet 1 of 2) from the access track/road. Where the streambeds are ill-defined DOC may need to install track poles.

Due to the great variations of river flows during spring and the end of summer, when the bull tahr start their mating season, trophy hunters become more mobile and farming operations could close the lake-side road, availability. The provision of an airstrip near the mouth of Pollock Stream or Angus Flats could be a solution for hunter access? (Similar to the Growler airstrip up the Ranagitata river south bank on Mesopotamia Station.) Allowance for such additional access should be noted in the TR Proposal.

There should be a least a public walking access route, marked along the DOC easement onto conservation land and into the Mistake valley.

Cass riverbed access from the true left hand bank, should be better defined from point 'e' beside the road, across the station paddocks to a point that better provides for a long-term walking access route.

Regards  
Graeme Williams