

## **Crown Pastoral Land Tenure Review**

**Lease name : LONGLANDS**

**Lease number : PO 260**

### **Public Submissions**

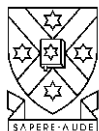
These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

These submissions are released under the Official Information Act 1982.

**August**

**15**

# Submission 1



Department of Botany

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August 26, 2015.

Manager,  
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Crown Property and Investment,  
Private Bag 4721,  
CHRISTCHURCH 8140.

## SUBMISSION ON PROPOSED TENURE REVIEW: LONGLANDS PASTORAL LEASE

Dear Sir,

Thank you for sending me a copy of this document and I appreciate the opportunity to comment on it based on my knowledge of the general area, having been associated with co-supervising the PNA Survey of the Dansey Ecological District by Ms Joy Comrie.

I have read the Summary report of the Preliminary Proposal and the Conservation Resources report prepared for this medium-sized (2083 ha) property, for which the proposal is to restore some 225 ha (10.8%) to full Crown ownership and control, comprising two conservation areas, one (CA1) of ~180 ha on the upper slopes of the north-eastern margin of the property, adjacent to the Kakanui Conservation Area, and CA2 of 45 ha, comprising a copper tussock-dominated depression, adjacent to the main pigroot highway (SH 85). There is also an old stone stable of archaeological importance in the separate 1221 ha "Home Block" which is proposed for protection as a heritage building.

Recent rain prevented inspection of the upper slopes of the property but the proposed copper tussock (*Chionochloa rubra* ssp. *cuprea*) Conservation Covenant adjacent to the highway as well as the landscape values, as seen from the highway, could be assessed in adequate detail.

The **proposed 45 ha copper tussock-dominated wetland (CA2)** occupies a toe slope of the Kakanui Mountains and is of **considerable ecological and landscape value** in its own right, particularly given its proximity to a major highway, but its **integrity** is associated with the narrow-leaved snow tussock (*C. rigida*) grassland of the adjoining slopes within the same catchment (another ~45 ha), from which much of the seepage draining into the wetland is derived. This **transition within the tall tussock grassland** is readily apparent from the highway in autumn when the copper tussock takes on a distinct copper hue. A **strong case can be made for including this entire catchment** of ~ 90 ha within this protected conservation area (see Fig. 1), rather than construct a new fence on a straight line across the centre of this small catchment, as is being proposed. Even though this additional upper slope area is proposed as part of a larger Conservation Covenant, the conditions associated with this covenant would allow periodic burning (to be associated with post-fire oversowing and required top-dressing) and the grazing of cattle as well as sheep. Adding an about equal area of snow tussock grassland here would also permit the coral broom (*Carmichaelia crassicaulis* var. *racemosum*) to flourish rather than be detrimentally affected by periodic burning as is currently the situation. I submit that this proposed fence and farming activities on a covenant within the upper half of this catchment would **seriously undermine the wetland values**, particularly its **long-term sustainability**, as well as its **integrity** and also its **visual appearance and appreciation from the highway** (see Fig. 2). I was pleased to read in the 71-page very detailed **Conservation Resources Report (CRR)** of the importance of this aspect (p. 10; para 7, where it states): "The area of red [copper] tussock on tertiary sediments adjacent to the

highway ..... on its own becomes somewhat meaningless in a landscape sense without the surrounding tall tussock to provide context and continuity." This 'representation' also extends to the **faunal component** of the tall grasslands, according to the CRR. The **landscape values**, including the coarsely rippled topography, perhaps associated with massive slumps some time in the past, would also be enhanced, from this most important part of the SH 85 (see Fig. 1), being alongside this frequently used route to Central Otago, where the tall tussocks currently extend over the road reserve to the very edge of the highway.

An **important ecological principle of reserve design** is to ensure the **ecological, especially catchment integrity and long-term sustainability**, as well as the **public appreciation, interpretation and understanding of the interaction of the environment and vegetation pattern**. To this end, I **strongly recommend** that the **fence proposed to enclose and protect this reserve, be built around the perimeter of this ~90 ha catchment**, which would be the skyline as seen from the highway and where an existing 4WD track would facilitate its construction (see attached map which has been modified to depict the suggested boundary to the proposed CA2 area). The existing fence on the western side of this proposed reserve, running north-northeast from the highway, would be suitable, as shown in the report.

Assuming this proposed CA2 area is accepted. I **strongly recommend it be formalised** as a scenic reserve; the **Pigroot Scenic Reserve**, comparable with and complementary to, the Lindis Pass Scenic Reserve alongside the crest of the Lindis Pass highway to the north.

I was unable to appraise the value of the **proposed Conservation Area CA1** but its description in the Report and the CRR indicates it has considerable value in ecological and biodiversity terms and would complement the Kakanui Conservation Area which it adjoins. Clearly its Land Use Capability classification (Classes VII and VIII) indicates that it is unsuitable to sustain pastoral use so that its retirement from grazing and formal conservation is a logical decision. As the report also notes, this tall tussock-dominated area **provides important ecosystem services** in the form of **maximising the production of clean fresh water** (see Mark & Dickinson, 2008; Kepner, et al. 2012; Mark, et al., 2012) for various down-stream uses, as well as soil conservation in a vulnerable landscape. It also **contributes to the 'outstanding natural landscape'** as **viewed from the highest sections of State highway (SH 85)**. Formal protection should assist with the containment of the hawkweeds in the area by allowing the tall tussocks to achieve their potential as a grassland dominant, although the several wilding pines should be removed as a matter of urgency, given their known serious threat to these 'old growth' upland grassland ecosystems: the dominant snow tussocks are likely potentially immortal (see Mark, Barrett & Weeks, 2012).

An **extension of the proposed CA1 area to the northwest**, using a continuation of the 4WD track that it follows to the proposed northwest edge, would be most desirable and certainly preferable to the essentially straight-line boundary with the Kakanui Conservation Area, as proposed. This additional area contains the same ecological values and is as vulnerable to pastoral use as the area already proposed, so that my **strong recommendation** is that it should also be considered for formal protection. Another **extension of this proposed CA1 conservation area, further down-slope** adjacent to the eastern boundary of the property, would add to the range of elevation and associated plant communities formally protected and is **recommended** for consideration. Assuming this proposed CA1 area is approved and formalised, and **added to the Kakanui Conservation Area**, I **strongly recommend** that the **larger conservation area** then be **elevated to Conservation Park status**, which would then assume **significantly greater status and security** than a mere conservation area, now known to have relatively limited status and security, as highlighted in a recent report by the **Parliamentary Commissioner for the Environment**.

The proposed **Conservation Covenant (CC1)** of some 660 ha (less ~45 ha if my recommendation for the CA2 area is implemented), as the report states, "**makes a significant contribution to the natural landscape within the Pigroot** as seen from SH 85 as it contains the last

vestiges of significant tall tussock that once covered large tracts of the Pigroot.” But, as also stated, the original indigenous shrub component, mainly *Coprosma intertexta* (ranked as ‘At Risk’), matagouri (*Discaria toumatou*), *Olearia lineata* (not *O. bullata*) and coral broom (*Carmichaelia crassicaulis*), have all been seriously reduced in abundance through burning (sometime aided by post-burn browsing as with the coral broom). The conditions included with this covenant, burning (15-yr minimum intervals), oversowing and topdressing, post-burn grazing (with a 1-yr compulsory spelling) of sheep only (not cattle according to the Schedule 2, should retain a tussock dominance but is unlikely to allow the natural shrub component to reestablish.

I trust that this response and its recommendations will be given serious consideration. I also thank you again for the opportunity to assess and comment on this important proposal for tenure review.

Yours sincerely,

Alan F. Mark. FRSNZ KNZM. Emeritus Professor.

**References cited:**

- Kepner, W.G., Ramsey, M.M., Brown, E.S., Jarchow, M.E., Dickinson, K.J.M., Mark, A.F. 2012. Hydrologic futures: using scenario analysis to evaluate impacts of forecasted land use change on hydrologic services. *Ecosphere* 3(7): 1-25.
- Mark, A.F., Barrett, B.I.P., Weeks, E. 2012. Ecosystem services in New Zealand's indigenous tussock grasslands: Condition and trends. In: J. Dymond (ed.): "*Ecosystem services in New Zealand - conditions and trends.*" Lincoln, Manaaki Whenua Press. pp. 1- 33.
- Mark, A.F., Dickinson, K.J.M. 2008. Maximizing water yield with indigenous non-forest vegetation: a New Zealand perspective. *Frontiers in Ecology and the Environment*. 6 (1): 25-34.



Figure 1. View from the State Highway across the proposed CA2 area of distinctively-coloured copper tussock grassland occupying the permanently moist depression. This grassland merges with narrow-leaved snow tussock grassland on the better-drained (and distinctively undulating) slopes behind. It is **strongly recommended** that these **slopes should be added** to the proposed conservation area (with its boundary fence along the 4WD track on the skyline, to be **representative of the area**

and also **provide integrity, particularly catchment integrity, and long-term sustainability** to the **proposed conservation area**. Moreover, it should be **designated** as the **Pigroot Scenic Reserve**.



Figure 2. View east along the **Pigroot State Highway (SH 85)** near its crest, showing the **proposed Conservation Area (CA2)** of **distinctively-coloured copper tussock grassland** to the immediate north (left) of the highway, even occupying part of the road reserve. The **skyline is proposed as the boundary** for this conservation area as the slope below is covered with **narrow-leaved snow tussock grassland** of contrasting plant composition and colour, and so **complements the proposed copper tussock grassland** but also **adds integrity and ensures long-term sustainability** to the proposed conservation area. This area should be formalised as the **Pigroot Tall Tussockland Scenic Reserve**.

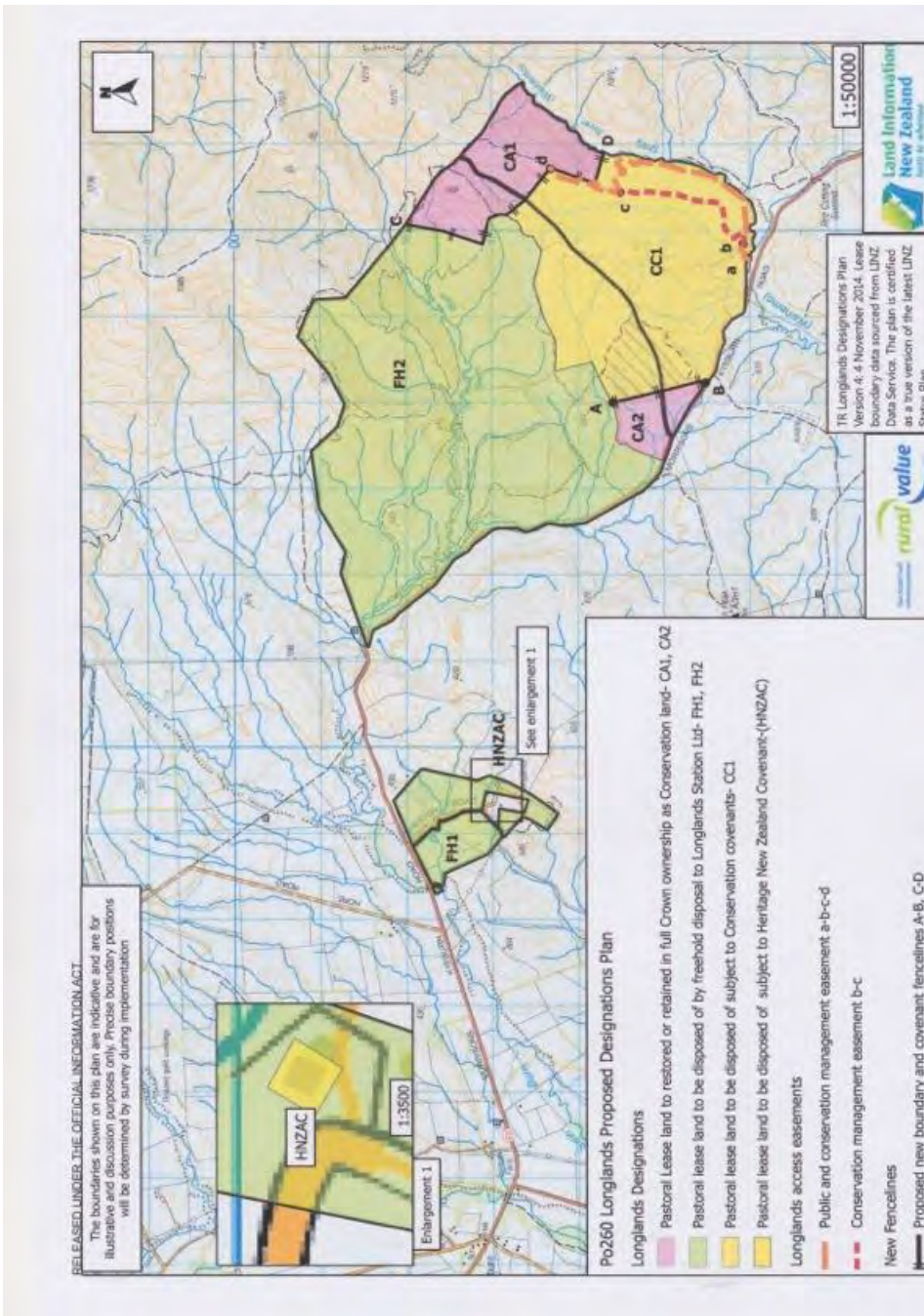


Figure 3. Map of Longlands Pastoral Lease showing the outline of the Preliminary Proposal as reported. The **recommended addition to the proposed CA2 area is the hatched area to the north-east**, which extends up to the ridgeline running off the State Highway, where a 4WD track would provide ready access for the proposed fence.

## **Submission 2**



**Partners:**

**MARK BARRY DEACON** LLB B.Com  
**KERRY MORAN DOWLING** LLB.BA.

**Legal Executives:**

KAYE BARNES NZILE  
Louise Thomas

20 May 2015

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

Dear Sir or Madam

## **TENURE REVIEW – SUBMISSIONS IN RELATION TO LONGLANDS PASTORAL LEASE**

We act for the current sub tenants of this leasehold. In our opinion, several important issues have not been addressed in the Preliminary Proposal (“the Proposal”). Our client’s concerns, which require our submissions, are as follows:

### 1. **Health & Safety – Hunting**

According to the Proposal the Crown shall retain ownership in, and exclusive occupation of, areas referred to as CA1 and CA2, the object of which is to protect certain native plants, in particular Tall Tussock. It is implicit in the terms of the proposed easement that the Department of Conservation (DoC) shall allow access to the public for hunting provided a permit is purchased. It is acknowledged these hunters will only be able to carry their firearms up the easement access but we submit that, nonetheless, this constitutes a significant risk to the health and safety of our clients and any future farmers of this land. The main foundation to this fear is the ubiquitous nature of hunting permits (hundreds are regularly issued) leading to a lack of safeguards and controls for the occupiers of the lease. They will receive no notice that anyone intends to hunt the block and there may be several different hunters present at one time. The block of land in question is easily accessible to hunters and will prove popular. This accessibility also relates back to the safety concerns. An active family farm will be it’s immediate neighbour, stray bullets travel many miles and present a very real danger to people and stock.

Our clients accept that a public area will be established by the Crown and that hunters will wish to use this (amongst others). They simply wish to ameliorate the inherent and obvious dangers to other hunters, recreational users and farmers by seeking that hunting only be permissible by a ballot system. Such a system would limit hunters and forewarn our clients with appropriate notice. It will also limit a potential issue with poaching or illegal hunting where access is too unrestricted. On the walk up the easement and while they are on the

Crown land they have the easy ability to view a very large tract of land in private ownership and leasehold. By only allowing hunting by those with a drawn ballot you incentivise them to keep within the confined area they are allowed to hunt in and lessen the likelihood that they will stray from that area in order to hunt animals they have spotted on neighbouring land.

It should be noted that poaching is a very real issue for the Longlands farm. Several hundred head of stock are unaccounted for over the last 3 years.

## 2. Unimpeded access for the public over the easement shall interfere with lambing.

Our client lambs between the start of September until the end of November. This is a very sensitive time for our client as a bad lambing percentage will directly affect the financial viability of their business operation. During this time the ewes are left to their own devices. Should they be interrupted by a person or persons utilising the easement the ewes will, in all probability, abandon their lambs. Most will eventually come back and be reunited with their lamb but a good many will not. This will result in a higher than acceptable rate of death for the lambs and lower returns for our clients. The proposed easement allows for the closure of the accessway at the Crown's discretion. Our client submits that it be recorded specifically that during September, October and November the access be closed annually. Unrestricted access will adversely affect every farmer who wishes to make a living on the leasehold. This can be avoided by this straightforward variation to the draft easement. Further discussions could be held regarding how DoC employees could access CA1 and CA2 during these months to monitor the environment with the assistance of our clients to minimise the risk of disturbing ewes and lambs.

## 3. Burning Freehold Land

Schedule 2 of the draft covenant lists the conditions that must be satisfied for the owner to burn his property. Our submissions are limited to two of these specified conditions:

### a. The purpose of the burn must only be to allow sheep access into dense tussock areas.

This is unnecessarily restrictive. Clause 4(b) of the applicable schedule lists 10 factors that must be considered or approved prior to the owner being allowed to burn. Together these factors are incredibly comprehensive including submitting for approval onerous written proposals. We therefore submit that this clause could be deleted altogether without harm befalling CA1 or CA2. Only one burn can be sought for any specific area every 15 years, why should its purpose be limited to sheep access? It is generally accepted that burnoffs are beneficial for encouraging regenerated growth. We submit that if the above condition cannot be removed it should be varied to read as follows:

"The purpose of the burn must only be to allow sheep access into dense tussock areas or to encourage new growth of tussock and grass through natural regeneration".

### b. Fertiliser

We submit that the volume of fertiliser required to be applied post burnoff is excessive and prohibitively expensive.

The Subclause in question reads:

*“Post burning the owner will top dress the land with a phosphate and sulphur based fertiliser at a rate of not less than 1.8kg of phosphorus and 2.2 kg of sulphur/ha (equivalent of 200 kg/ha superphosphate)”.*

For the particular farming area this is an extraordinary application of fertiliser completely unnecessary for the good husbandry of the land and it's general health. It will act as a disincentive for burning at all which will ultimately prove counterproductive for the land which is surely the opposite result to what is intended. We suggest that the clause in question be varied as follows:

*“Post burning the owner will topdress the land at a rate of not less than 150kg/ha superphosphate in accordance with good farming practice in the area. Contemporaneous with this top dressing the owner will apply grass and clover seed to the land”*

#### 4. Summary

Our client supports LINZ and the Department of Conservation in their intended goals of protecting areas of significant inherent values. They simply wish to offer suggestions that counter balance this with several unobtrusive amendments that will protect the environment, allow public enjoyment but also ensure safe and successful sheep farming.

It is worth noting that the Longlands Station represents one of the oldest farms in the district. It is an institution itself, deserving of some consideration when taking into account it's cultural, economic and environmental contributions to the Kyeburn/Pigroot area and beyond.

Yours faithfully  
SUMPTER MOORE  
Per

Kerry Dowling  
(Milton Office)  
email [kerry@sumptermoore.co.nz](mailto:kerry@sumptermoore.co.nz)

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## **Submission 3**



Dunedin Branch  
PO Box 5793  
Dunedin 9058

21.5.15

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

Dear Sir,

I enclose these submissions on the preliminary proposal for Longlands Pastoral Lease on behalf of the Dunedin Branch of Forest and Bird.

Thankyou for the opportunity to make submissions on this proposal and for arranging permission for us to inspect the lease.

Yours sincerely

Janet Ledingham  
For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society

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## **Submission on the Preliminary Proposal for Longlands Pastoral Lease**

### **On behalf of the Dunedin Branch Forest and Bird Management Committee.**

This submission is written on behalf of the Dunedin Branch of the Forest and Bird Protection Society which has approximately 900 members, many with strong interests in the High Country values and recreational opportunities as well as in botany and natural history in general. Many of the members enjoy active recreation in the back country and are very aware of the need to ensure the protection of natural values, vegetation and landscape, historical sites and to improve public access through the tenure review process.

The submission is written with reference to the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the government objectives for the South Island high country, especially the following:-

- *to promote the management of the Crown's high country in a way that is ecologically sustainable.*
- *to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.*
- *to secure public access to and enjoyment of high country land.*
- *to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy to progressively establish a network of high country parks and reserves.*

This submission is made on the basis of an inspection trip with other NGO's; Forest and Bird and FMC, at the early warning stage in 2012 and more recently in April 2015. We have also consulted the Conservation Resources Report (CRR).

#### **Introduction**

Longlands is a small lease of about 2000ha extending from The Pigroot, SH85 at a little over 500m up to about 900m on the southern side of the Kakanui Mountains. The top part of the lease was surrendered some years ago to become part of the Kakanui Conservation Area.

#### **The proposal:**

**CA1 - Land to be restored to full Crown ownership and control as a conservation areas which will become a 180 hectare addition to the Kakanui Conservation Area.**

The CA1 SIV's are well described in the CRR and although we were unable to get to the upper part of it on our recent inspection due to track conditions, one of us saw the area on an earlier visit in 2012 and has passed through it on a recent botanical trips up to Kakanui Peak.

**We endorse the proposal to add CA1 to the Kakanui Conservation Area and submit that then the whole Area be designated a Conservation Park to give it a higher degree of protection.**

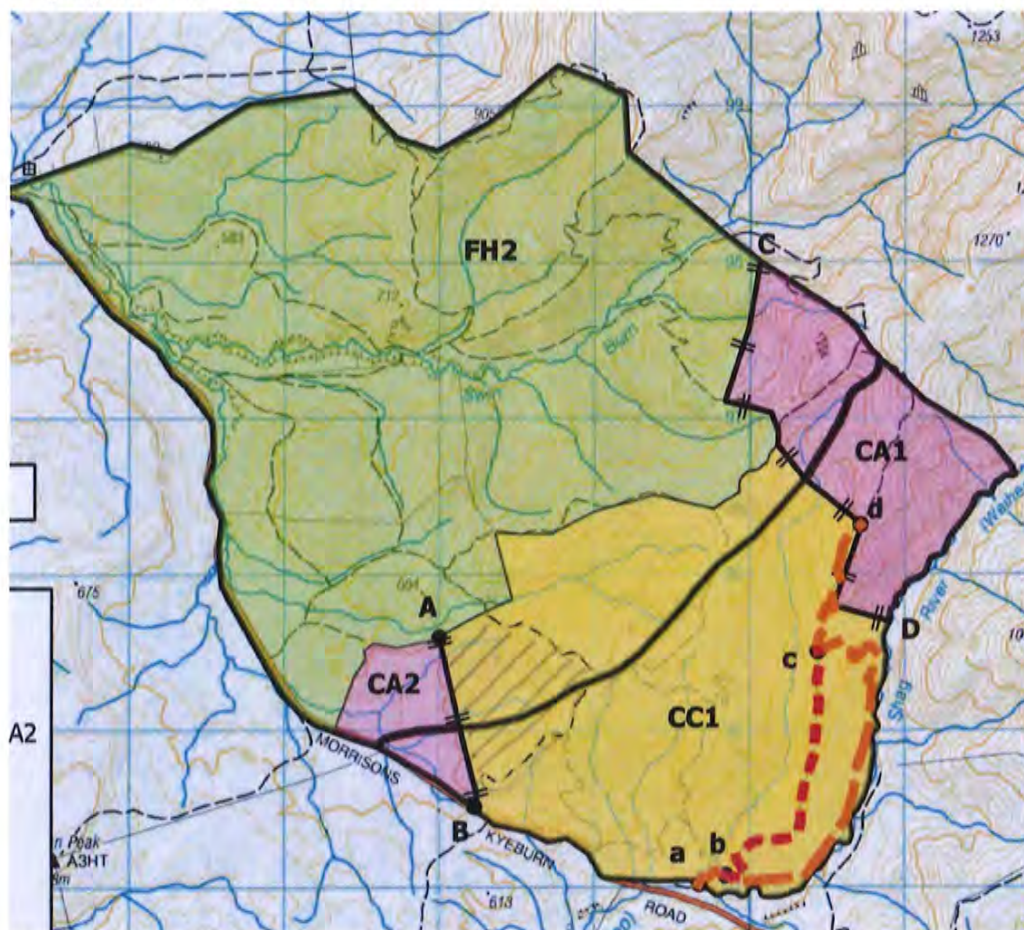
**We recommend that CA1 be extended further to the south to give a slightly better altitudinal sequence and provide more of an area where the coral broom could flourish in a non-burning environment and contribute to the landscape.**

#### **CA2 - Copper Tussock Reserve Area, 45ha**

We applaud the intent to protect this area of substantial copper tussock dominated wetland on a toe slope of the Kakanui Mountains but submit that it must be enlarged to protect its whole catchment as is shown in Figure 1. The addition of the hatched area shown to the east of proposed CA2 would achieve this.

The proposal notes that *'the indigenous vegetation associated with this area provides important habitat for both botanical and invertebrate values and deserves protecting. It also provides important ecosystem services in the form of maintaining regular flows of clean water for irrigation and domestic purposes within the Swin Burn which flows into the Taieri River. The significance of the Swin Burn for supporting natural and human use values is recognised in the Otago Regional Water Plan'*. The maximum protection for the ecosystem services will only be achieved if the whole catchment is protected, a fact that seems to have been overlooked. We submit that CA2 as proposed does not conform with the Part 2 CPL Act, Section 24(a)(i): *to promote the management of reviewable land in a way that is ecologically sustainable* - unless the whole of the copper tussock catchment is protected.

Moreover the CC1 covenant where we have drawn the proposed CA2 extension does have a burning condition and this would have a deleterious effect on the water services from CA2 as the PP proposal stands.



**Figure 1.** Showing the desired extension to CA2 (hatched area) which would then encompass all of the catchment of the copper tussock area.

In addition to giving maximum protection to the ecosystem services over the whole catchment an enlarged CA2 would be much more representative of the ecology of the area; with the obvious transition from copper tussock to snow tussock grassland, a point recognised by the CRR which states under the discussion on Landscape Unit 2: *'The area of red tussock on tertiary sediments adjacent to the highway is important visually to the highway experience especially when travelling towards the Maniototo Plain. The tussock provides a context and appearance of a tussock upland leading into Central Otago and a key indication of what the character of the Pigroot once was.'* The CRR notes that this 'representation' also holds for the faunal component of the tall grasslands.

The landscape as currently viewed from SH 85 highlights the transition from copper tussock right at the highway up to narrow-leaved snow tussock grassland on the steeper upper slopes and is an

important feature to preserve since comparable landscape showing what the character of the Pigroot, a heavily used route into Central Otago, once was has now been largely lost.



**Figure 2.** CA2 copper tussock in foreground and the catchment area which should be a part of CA2



**Figure 3.** A further view of the above where the transition from copper tussock to snow tussock grassland is clearly seen from the roadside. This catchment and ecosystem need to be protected as one entity.





**Figure 5.** CA2 copper tussock showing the quality of it which can only improve once the stock have been removed and the whole of its catchment protected as well.

We note that periodic burning with associated topdressing is to be permitted over the area of CC1 that we propose for addition to CA2, **this would not be consistent with maintaining the long-term integrity and sustainability of the proposed conservation area; nor would it be visually intact as seen from the highway**, a further reason for adding it to CA2

Fencing of the enlarged CA2 would surely then have little effect on the landscape since it would be immediately adjacent to existing track lines and thus avoid the need for further very visible landscape disturbance from a new bulldozed track which might well happen if the new fence in the proposal was to remain.

The CRR very adequately describe both flora and fauna worthy of protection within the enlarged CA2 which we propose.

**We fully endorse the designation CA2 to protect the copper tussock integrity and its contribution to the ecosystem water services and landscape but strongly submit that it be extended to cover the whole catchment and be designated a Scenic Reserve which would afford it more protection than Conservation Area status has. The proposed addition to the CA2 would be relatively modest in size: about doubling the present proposal so ~ 100 ha.**

**FH1. Land to be disposed of by Freehold Disposal, approx. 1858 ha**

**We have no objection to this area becoming freehold land**

**HNZAC. A Heritage NZ Conservation Covenant over the old stables**

**We fully support the creation of this covenant with the intent to protect the old stone stables which are of archaeological significance as described in the preliminary proposal**

**and in the CRR.**

**FH2. Land to be disposed of by Freehold Disposal, approx. 1737 ha**

**We have no objection to the freeholding of the area marked FH2 given that it is all classified as LUC Class VI or lower, and suitable for pastoral use and has been highly modified by farm development.**

**We do recommend that there be some minor changes to the area designated CC1 as discussed below.**

**CC1. Conservation Covenant, approx 660 ha**

We note that the object of this covenant is to manage it to maintain or improve the tall tussock landscape and natural riparian values and that threatened Taieri flathead galaxias have been found in the southern area of Long Gully Creek. In the discussion of the proposed designations with regard to the objects of Part 2 of the CPL Act it is stated that Covenant status will result in the protection of the tall tussock grassland and indigenous shrublands in the headwaters of the Swin Burn and Shag Rivers which is important for retaining regular clean water flows which are important for irrigation and domestic purposes. CC1 is also an important component of the landscape as seen from SH 85 with its highly visible tall tussock vista, which once covered large areas of the Pigroot.

The tall and inter-tussock vegetation and other flora, fauna and aquatic values worthy of protection are well described in the CCR and in the proposal and in general the proposed conditions seem adequate. We noted on inspection that a previously burned area of CC1 had also destroyed many coral broom (*Carmichaelia crassicaulis* var. *racemosum*) plants which did not appear to be able to recover which is unfortunate and that burning, albeit with some stringent conditions is still to be permitted at 15year intervals.

**We endorse the creation of CC1 to protect the SIV's within it and consider that the proposed conditions and monitoring proposed are adequate.**

**Under our discussion on CA1 we do propose that a small area in south of point 'D' in CC1 instead be added to CA1**

**Access**

**The access proposed which initially follows the lease eastern boundary largely alongside the Shag River to point c and then c-d is endorsed.**

**No public 4WD access is proposed -we did discuss this with Mr Preston and he indicated that permission could still be given to use the 4WD route up which leads to the Kakanui Conservation area and hence on to Kakanui Peak when track conditions were suitable and we think this is important as it is great area for botanising and many people who would wish to do this would not be capable of walking up as a day trip.**

**Acknowledgement**

We wish to thank Mr Geoff Preston for allowing us to inspect the lease and David Paterson of Rural Value for facilitating the inspection.



Janet Ledingham

## **Submission 4**

27 May 2015

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

## **Preliminary Proposal for Tenure Review of Longlands 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 Longlands 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;

### **Supports**

- *the creation of the public access easement 'a-b-c-d'.*

### **Seeks**

- *to have easement 'b-c' along the ridgeline of CC1 re-designated from just Conservation management to also provide for public access (foot, horse and bicycle).*

## **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.

Central to its role is the Commission's leadership functions in 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 Longlands 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 can also assist in achieving the statement in the Land Information New Zealand (LINZ) Statement of Intent 2014-2018 in respect of Crown Property which refers (p.17) to an

objective of “..ensuring that the best economic, environmental and recreational uses are being made of Crown-owned and Crown used land.”

This submission should be considered as new information provided by 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.

## **B. Submission**

### **Existing public access**

An unformed legal road (ULR) provides a direct route for legal public access running from the Morrisons Kyeburn Road (part of State Highway 85, the ‘Pigroot’) about 2 kilometers west of the Shag River crossing. The ULR travels northeast, generally across ridgelines, to finish at Kakanui Peak on the the Horse Range. Although providing legal access, the ULR does not necessarily provide practical access (see Figure 1).

Limited legal public access is also available via marginal strip on the eastern boundary of the property northeast alongside the Shag River, to the conservation area, part of the Kakanui Conservation Area.

### **Proposed public access**

Practical secure public access is required to the proposed CA1, and part of the Kakanui Conservation Area which adjoins the property to the northeast. Kakanui Peak (1528m asl) is a significant landscape feature of the this area, and is the highest point for some kilometres around, thereby providing the opportunity for expansive views.

The Preliminary Proposal provides for public access (foot, non motorised vehicle and horse) by easement along route ‘a-b-c-d’ via the Shag River - along the existing boundary fence close to the existing marginal strip.

No public access is provided for along the ridgeline formed track, running northeast from SH85 on the Horse Range that has been designated as an easement (b-c) for conservation management only.

### **Recommendations**

The Commission supports the creation of the easements (‘a-b-c-d’) on the formed track and in the vicinity of the Shag River marginal strip.

The Commission notes that the conservation management easement ‘b-c’ can provide a more practical route for bicycles (rather than the valley route) and therefore should also be made available for public access (foot, horse and bicycle). This would better meet the objectives of current legislation by providing more practical public access.

The Commission therefore recommends a change of easement designation to provide public access (foot, horse and bicycle) along the ridgeline easment ‘b-c’.

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

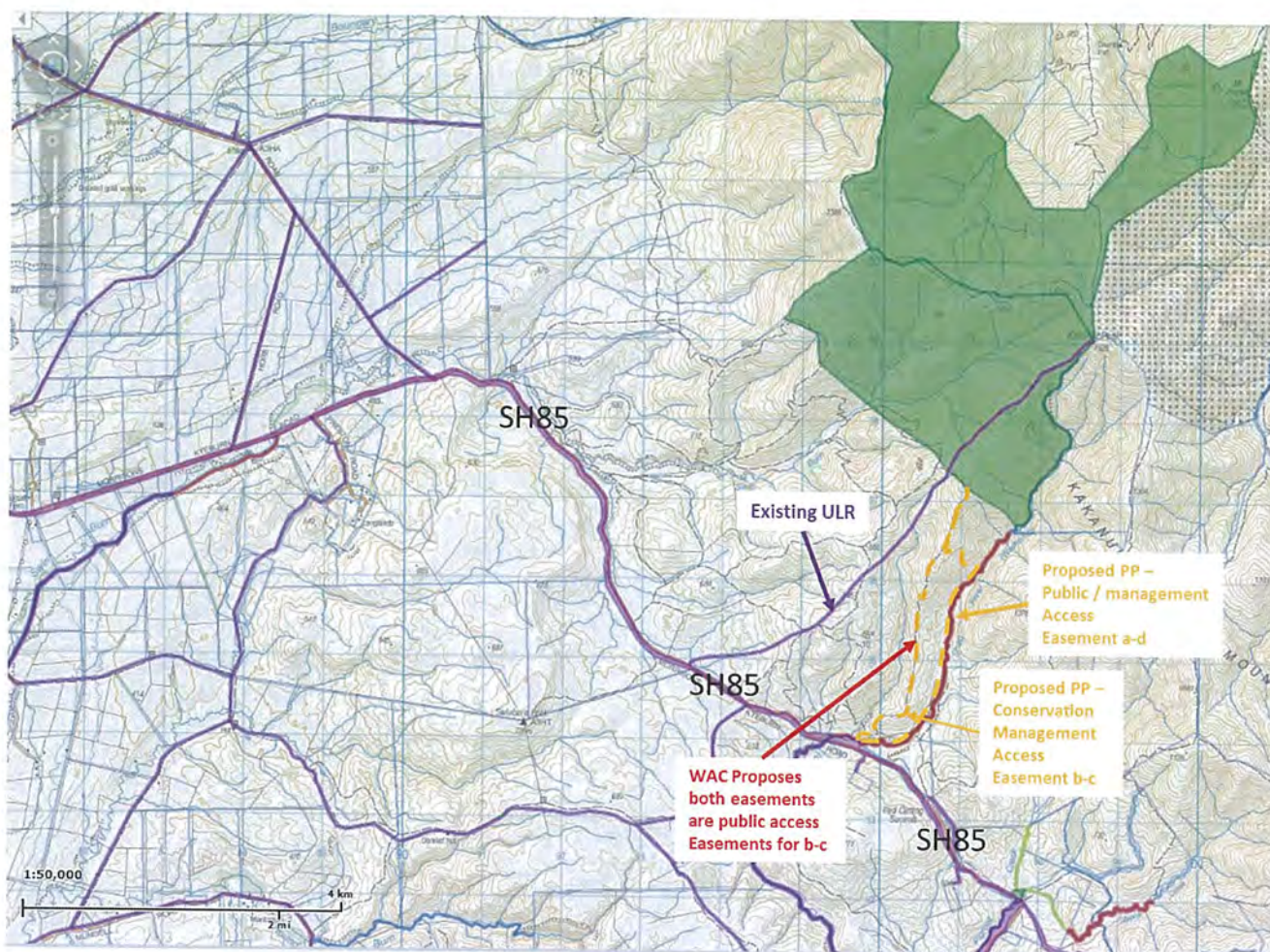


Figure 1: Shows the existing ULR bisecting the Longlands property in relation to the proposed access easements.

## Conclusion

*The Commission:*

1. **Supports** the creation of the public access easement 'a-b-c-d' (via the valley).
2. **Seeks** to have ridgeline easement 'b-c' provide for public walking, horse and cycling access.

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

Yours sincerely

Mark Neeson  
Chief executive

## **Submission 5**



# OTAGO CONSERVATION BOARD

## Poari Papa Atawhai – ā-rohe ki Ōtāgo

Box 5244, Dunedin 9058 Tel: (03) 474 6944 Email: [ahooper@doc.govt.nz](mailto:ahooper@doc.govt.nz)

File: SBC-08-34

27 May 2015

LINZ – Crown Property and Investment  
Private Bag 4721  
CHRISTCHURCH 8140

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

Dear Sirs

### **Review under Part 2 Crown Pastoral Land Act: Longlands Pastoral Lease**

The Otago Conservation Board (“the Board”) is appointed by the Minister of Conservation to represent the wider Otago community in advocating for the protection of biodiversity, recreational opportunities and the conservation of natural and historic resources throughout Otago. The Board takes a strong interest in tenure review and makes submissions on all proposals in Otago.

The Board acknowledges that the Longlands property extends across the conservation boundary between its own jurisdiction and that of the neighbouring Canterbury Aoraki Conservation Board. The Canterbury Board has advised that it is aware of and comfortable with the Otago Board making a submission on the Longlands Preliminary Proposal.

You will be aware from previous submissions that the Board generally subscribes to the principles set out in the Crown Pastoral Land Act, in particular section 24 which favours Crown ownership and control over other protective mechanisms.

Whilst the Board is, by and large, supportive of the Longlands Preliminary Proposal, it considers that there is a strong case for amendment by adding the wetland catchment area part of CC1 to the proposed CA2 area. The rationale for such an amendment is based on the well-established catchment management principle which prefers, whenever feasible, a “whole-of-catchment” approach. The Board believes this is preferable to apportioning areas within a catchment into different land uses. This is particularly important when eco-system services such as water provisioning are considered, and also for retaining and conserving landscape integrity. Additionally, the Board suggests that the upland part of the catchment area would be of limited benefit for farming purposes.

The Board notes that CC1 makes provision for burning at +/- 15-year intervals, topdressing (usually required after burning), and sheep and cattle grazing. A new fence would be required with such land-use, which would need to be constructed in such a way that it would bisect the face (and catchment). As a general principle, the Board believes that fence lines should not bisect an area.

The Board suggests other matters for consideration are that the transfer of the upper part of CC1 to CA2 would protect the transition for narrow-leafed snow tussock grassland on the steeper, upper slopes (which is particularly apparent at this time of the year when the copper tussock takes on a distinctly copper hue), and also would provide a much better representation of the ecology of the area – with an approximate 50:50 ratio of copper and snow tussock grassland.



The detailed Department of Conservation's Conservation Resources Report (CRR) mentions the importance of this on page 10, paragraph 7, as follows: "The area of red tussock on tertiary sediments adjacent to the highway ..... on its own becomes somewhat meaningless in a landscape sense without the surrounding tall tussock to provide context and continuity". This "representation" extends to the faunal component of the tall grasslands ecosystem, according to the CRR.

The Board also supports taking account of the point that landscape values would be enhanced from State Highway 85, as this frequently-used route to Central Otago passes through areas where tall tussocks currently extend through the road reserve to the edge of the highway.

The Board agrees that the property contains natural vegetation and landscape features of value, and these are worthy of protection within the proposed CC1.

The Board has considered that the preliminary proposal allows for grazing within CC1 and that the effects and impacts are to be monitored. It is the Board's view that, as monitoring incurs an obligation and cost on the Department of Conservation, this could be diminished, by a significant degree, if the upper part of CC1 was included in CA2

In conclusion, the Otago Conservation Board generally supports the adoption of the Preliminary Proposal for the tenure review of Longlands Pastoral Lease, but strongly advocates for an amendment to add the upper part of CC1 to the proposed CA2 wetland area. An amended proposal map illustrating the Board's proposed land changes is attached, for your consideration.

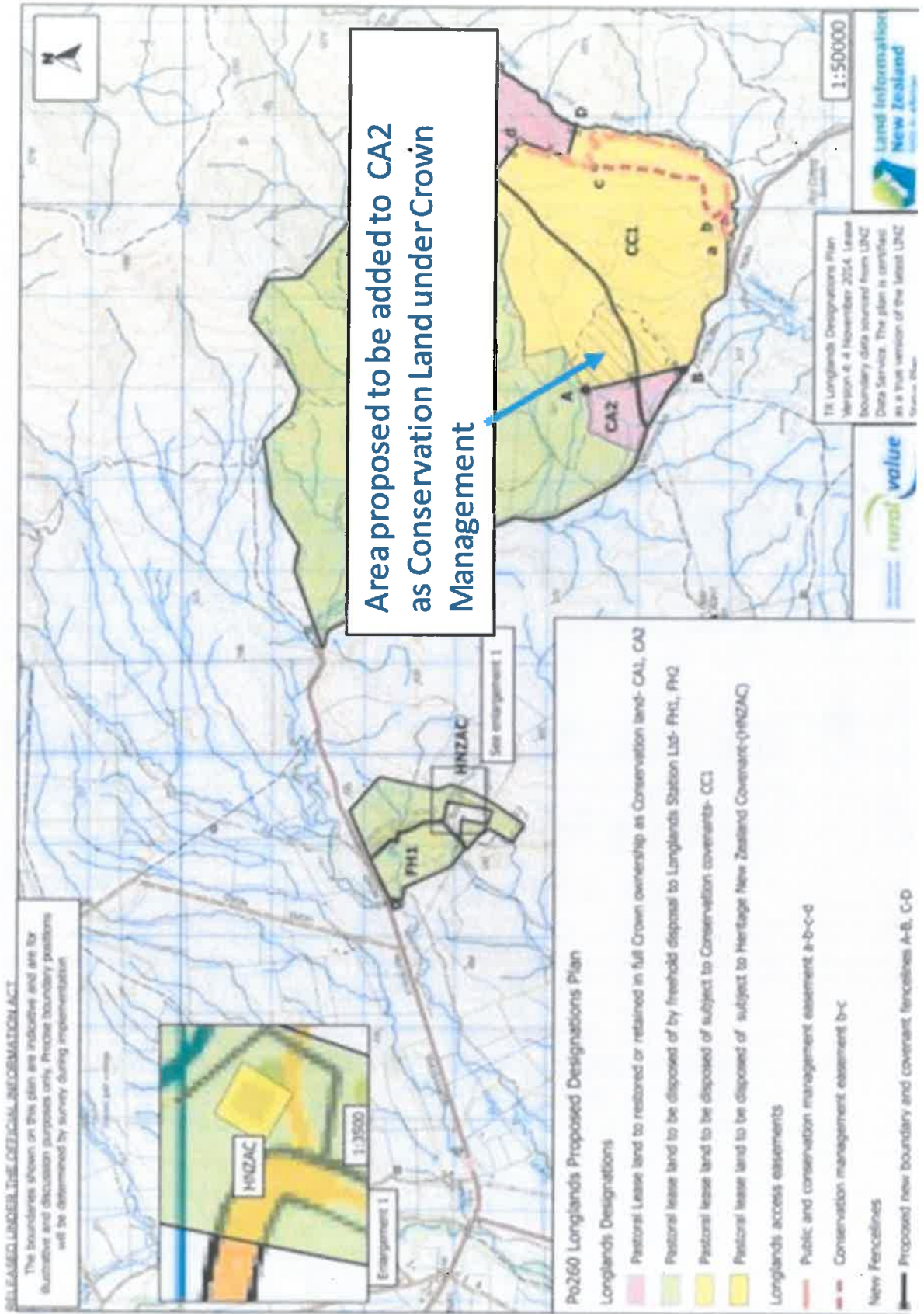
Yours sincerely



Pat Garden  
**Chairperson**

***Attachment:***

Amended proposal map with proposed addition of upper part of CC1 to CA2 wetland area



## **Submission 6**



Our Ref: 12012-259  
Your Ref: Po260

20 May 2015

The Manager  
Crown Property & Investment  
LINZ  
CBRE House, 112 Tuam St  
Private Bag 4721  
CHRISTCHURCH 8140



CA 10099789

Dear Sir/Madam

**RE: LONGLANDS PASTORAL LEASE TENURE REVIEW**

Thank you for your letter of 27 March 2015 concerning the tenure review of Longlands Pastoral Lease.

Heritage New Zealand Pouhere Taonga is a Crown Entity and is New Zealand's lead agency in historic heritage management. Its purpose is to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand, as provided for in the Heritage New Zealand Pouhere Taonga Act 2014.

Heritage New Zealand has contributed staff resources to tenure review site inspections and assessments previously and understands the significant inherent values approach for tenure review. These reviews offer a 'one off' opportunity to ensure the Crown's commitment to the identification of heritage values located on pastoral lease land and warranting recognition and protection is met.

Heritage New Zealand has undertaken a desktop check for the area covered by Morven Hills which included checking the New Zealand Heritage List/Rārangī Kōrero, the NZ Archaeological Association database, and a review of information available to Heritage New Zealand's Regional Archaeologist for Otago/Southland. We advise the following from our investigations:

**1. 1860s Stone Stable**

1.1 Heritage New Zealand strongly supports the recommendation that a Heritage Covenant is placed on the stone stable.

Recommendation for the Stone Stable

1.2 Heritage New Zealand recommends that a Conservation Plan is prepared to identify the cultural heritage significance for the Stables and sets how these are to be managed into the future.

**2. Archaeological Sites, including Water Races and Mud Brick Cottage**

2.1 These sites under protected under the Heritage New Zealand Pouhere Taonga Act, 2014.

2.2 Heritage New Zealand notes that a water race was damaged by farming activity in 2008 (Shag Valley Water Race (I42/121). This was recorded by archaeologist Jill Hamel and the Department of Conservation.

Recommendations for archaeological sites

2.3 Heritage New Zealand recommends:

2.3.1 Cattle and vehicles should be kept away from the archaeological sites. Where possible, they should be fenced.

2.3.2 Vegetation impact on historic remains should be monitored.

Thank you for the opportunity to comment on the Longlands tenure review proposal. Please let us know if you have any queries with respect to the above.

Yours sincerely



Jonathan Howard  
Area Manager (Otago/Southland)

## **Submission 7**

**FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND INCORPORATED**  
**P.O. Box 1604,**  
**Wellington.**

27/05/2015

Commissioner of Crown Lands,  
CBRE House, 112 Tuam Street,  
Private Bag 4721,  
CHRISTCHURCH 8140

Address for service: admin@fmc.org.nz

Dear Sir,

**Re: Preliminary Proposal for Tenure Review Longlands Pastoral Lease (Po 260)**

I write on behalf of Federated Mountain Clubs of NZ Inc. (FMC) which represents over 17,000 club members and individual supporters of tramping, mountaineering, climbing and other outdoor activities throughout New Zealand. We also indirectly represent the interests and concerns of many thousands of private individuals who may not currently be members of clubs but who enjoy recreation in the back country. On their behalf, FMC aims to enhance recreation opportunities, to protect natural values, especially landscape and vegetation, as well as historic values and to improve public access to the back country through the tenure review process.

FMC fully supports the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and government's stated objectives for the South Island high country especially the following:-

- to promote the management of the Crown's high country in a way that is ecologically sustainable.
- to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.
- to secure public access to and enjoyment of high country land.
- to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy.
- [EDC Min (03) 5/3; CAB Min (03) 11/5 refer]

\* Note that regardless of the changes of government and of governments' policies, these objectives are the requirements of the Crown Pastoral Land Act 1998.

We believe that the additional objectives are fundamental to the future well-being of the South Island high country and should be given appropriate weight in the tenure review process.

In view of the lack of protection over Conservation Act s62 stewardship land, as recently noted in the Parliamentary Commissioner for the Environment's Report (2014), we believe that it will be necessary to provide stronger protection for Conservation Areas created as outcomes of tenure

review. It is not appropriate to continue placing these areas in the “statutory holding pen” of s62 stewardship land when the tenure review process provides a more than adequate assessment of the land’s values, as required to place the appropriate protective status over the land (under either the Reserves Act 1977 or Conservation Act 1987).

For this review, it may be more appropriate to protect significant inherent values in areas such as CA1 by designating them as Scientific Reserve or Scenic Reserve. The historic reason for classification as s62 stewardship land was because there was inadequate data to recommend a more appropriate classification. In this case, there is ample justification for such designation as indicated in the CRR reports and in the preliminary proposal (PP). We therefore have good reason to recommend that CA1 should be formally designated as Scenic Reserve..

FMC has previously written a Preliminary Report on Longlands Pastoral Lease entitled “Preliminary Report on Recreational Landscape, Historic and other Conservation Values and Recommendations for the outcomes of tenure review – Longlands Station”(2012).

We are pleased to note that some of those recommendations are now included in the Preliminary Proposal (PP) for the tenure review of Longlands Pastoral Lease. We comment in detail on these proposals in this submission. Other recommendations were not adopted but will be addressed in this Submission.

## **1. INTRODUCTION**

The main issues in this review are as follows:-

- a) Access to Kakanui Mountains
- b) A New “Long Distance Path” East to West from the Horse Range to Danseys Pass.
- c) Consider extending CA1 down to SH 85.
- d) Consider the sustainability of CC2
- e) Landscape protection of the Kakanui face seen from SH 85.

In view of the lack of protection over Conservation Act s62 stewardship land, as recently noted in the Parliamentary Commissioner for the Environment’s Report (2014), we believe that it will be necessary to provide stronger protection for Conservation Areas created as outcomes of tenure review. It is not appropriate to continue placing these areas in the “statutory holding pen” of s62 stewardship land when the tenure review process provides a more than adequate assessment of the land’s values, as required to place the appropriate protective status over the land (under either the Reserves Act 1977 or Conservation Act 1987).

For this review, it may be more appropriate to protect significant inherent values in areas such as CA1 by designating them as Scientific Reserve or Scenic Reserve. The historic reason for classification as s62 stewardship land was because there was inadequate data to recommend a more appropriate classification. In this case, there is ample justification for such designation as indicated in the CRR reports and in the preliminary proposal (PP). We therefore have good reason to recommend that CA1 should be formally designated as Scenic Reserve.

## **2. THE PRELIMINARY PROPOSAL**



The Summary of the Preliminary Proposal seems shorter than usual and contains much less detail in the 'Description of the Proposed Designations'. In order to write our submissions on the proposal we have referred to additional sources of information including the NZ Land Resources Inventory, Land Use Capability maps and Conservation Resources Reports.

#### **a) General Description of the Proposal**

The description of the Proposal consists of two parts:-

**(1) 225ha (approximately) to be designated as land to be restored to or retained in Crown control** as Conservation Area held for the purpose of conservation management pursuant to Section 35(2) (a)(i) Crown Pastoral Land (CPL) Act 1998.

**(2) 1858ha (Approximately) to be designated as land to be disposed of by freehold disposal** to the Holder under Section 35(3) Crown Pastoral Land Act 1998; subject to:

- Part IVA of the Conservation Act 1987;
- Section 11 of the Crown Minerals Act 1991;
- the granting of a Public and Conservation Management Purposes Access Easement;
- the granting of a Conservation Covenant; and
- the granting of a Heritage New Zealand Covenant

#### **FMC SUBMISSIONS**

3. **Land to be retained in Crown ownership** -225ha (approximately) to be designated as land to be restored to or retained in Crown control/

FMC notes that this proposed designation consists of two Conservation Areas – (CA1) of 180 ha, and a second Conservation Area (CA2) of 45ha.

#### **a) Proposed Conservation Area - Addition to Kakanui Conservation Area (Area CA1)**

##### Comments

Conservation Area CA1 (180 ha) consists of very steep snow tussock and sub-alpine scrub covered hill adjoining an existing Conservation Area on the Kakanui Range. This is the highest land on the property and extends from about 700 to 1100m and adjoins an existing Conservation Area (Kakanui Conservation Area) on its northern boundary.

The positioning of this proposed Conservation Area on the Kakanui foot hills running up towards Kakanui Peak is important from recreational, conservation and landscape perspectives because it enhances the conservation values on the ground, landscape values as seen from SH 85, and recreational values of access to the southern end of the Kakanui Mountains. The Significant Inherent Values (SIVs) are well described in the Conservation Resources Report (CRR) and in the summary of the Proposal. These include diverse woody indigenous vegetation communities, tall tussock grasslands, numerous seepage and flush

wetlands which provide important ecosystem services of water yield and maintaining base flow in the Swinburn (part of the Taieri catchment) and Shag River catchments.

We note that this area also forms part of a continuous area of tall tussock grassland that extends from SH 85 to the upper reaches of the Kakanui Mountains. We believe that there is therefore a case for extending the lower boundary of CA1 down to SH 85 to include part of CC1 within CA1. This section of CC1 contains little grazing values, as it is steep and incised, so adding it to CA1 would occur at little cost to the present farming regime.

This will be discussed further under sections on proposed freehold designation and part of the covenant area CC1.

### Submission

FMC supports the proposal to designate this part of the Kakanui foothills as a Conservation Area for reasons related to SIVs, landscape enhancement, recreational opportunities and the important water yield ecosystem service value of tussock grasslands.

FMC supports the extension of CA1 over part of the land currently proposed for CC1.

FMC also wishes to see CA1 designated in a more appropriate land status, such as the Pig Root Scenic Reserve.

### **b) Proposed Conservation Area - Copper Tussock Reserve (Area CA2)**

#### Comments

Conservation Area CA2 (45 ha) consists of a significant wetland area which forms part of the toe slope of the Kakanui Mountains adjacent to SH 85. This area is dominated by tall tussock grassland and represents a remnant of much more extensive areas of red tussock close to SH 85. The proposed conservation area is important because it makes a significant contribution to the landscape visible from SH 85. It is also important as habitat of the threatened species of speargrass and buttercup which are present within CA2.

The wetland also makes a significant contribution to the hydrology and water supply from the Pigroot area through the ecosystem services of water harvesting and storage which are important for maintaining flows in the Swinburn and Shag River catchments.

The designation as conservation area will protect the wetland area from threats due to possible drainage and cultivation.

However, the current boundaries of CA1 do not include the whole catchment of the wetland. This will allow for grazing and burning and any associated downstream sedimentation to affect the wetland. Therefore, it is vital that the boundary of CA2 is extended to include the full catchment of the wetland.

The submission of Sir Alan Mark and the Royal Forest and Bird Protection Society provide further information on the necessary extensions to CA2, based on their detailed field inspection of the wetland.

#### Submission

FMC fully supports the proposal to designate 45ha of red tussock wetland adjacent to SH85 for reasons of its SIV and landscape value as well as its ecosystem service of water conservation.

4. **Land to be disposed of by Freehold Disposal to Longlands Station - 1858ha** (Approximately) to be designated as land to be disposed of by freehold disposal to Longlands Station Ltd. under Section 35(3) Crown Pastoral Land Act 1998;

#### **a) Home block marked FH1 on the Designations Plan**

##### Comments

This small (121ha) block is situated on Preston Road and surrounds the homestead and main farm buildings. It consists of relatively intensively farmed land including 80ha of permanent pasture and 41ha of oversown hill. The main homestead situated at about 500m is on existing freehold land surrounded by pastoral lease. The buildings include the homestead and stables which are of significant historic value dating back to the 1860s, and being built of local basalt stone. The buildings are a good example of relatively intact early stone buildings in a setting with a strong association with the early pastoral history of Otago.

We are pleased to note that the historic stables will be protected by designation as a Heritage New Zealand Conservation Covenant which will protect the old stables from damage or destruction of the building as well as the removal of artefacts associated with the past, and deterioration of the structure.

#### Submission

FMC strongly supports the proposal to designate the historic stables and associated artefacts for protection under a Heritage New Zealand Conservation Covenant.

#### **b) Run Block marked FH2 and CC1 on the Designations Plan**

##### Comments

This proposed freehold (1,737ha) block comprises the lower foothills of the Kakanui Mountains extending northwards from SH 85 at about 500m to the boundary with an existing conservation area (Kakanui Conservation Area) at 900m. The existing conservation area was formerly part of Longlands Station and it is important to note that this area extends up to Kakanui Peak at 1,528m so the proposed freehold area forms the lower part of a much wider and higher landscape.

We are aware that much of the proposed freehold area has been classified LUC Class IV and VI with reasonable prospects for ecologically sustainable pastoral use so long as it is managed carefully, and soil nutrient reserves are replenished with regular application of appropriate fertiliser materials. Above about 700m the vegetation grades into snow

tussock dominant grassland with mouse-eared hawkweed dominating the inter-tussock spaces.

The summary of the proposal describes the balance of the land between about 500 and 700m as consisting of two parts – (i) the southern portion of FH2 which is less modified by farm development and (ii) the northern portion which has a less continuous cover of tall tussock extending from valley floor and having been more fragmented with farm development.

An alternative description might be that of a continuum from the relatively intensively developed pastures on the valley floors of the Swin Burn and its tributaries with fertile lowland Yellow Grey Earth soils classified LUC Class IV, to the higher ridges and foot hills of the Kakanui Mountains with extensive tall tussock grasslands with frequent patches of shrubland on less fertile High Country Yellow Brown Earth soils on steeper country towards the proposed Conservation Area CA1 in the NE corner of the property.

It is clear that at one end of the continuum, the developed pastures are capable of supporting ecologically sustainable pastoral land use (so long as soil nutrients are regularly replenished with appropriate fertiliser) and are therefore suitable for freehold disposal.

At the other end of the continuum the significant inherent values of the tall tussock grasslands are better suited to conservation management and maintenance of the 'ecosystem services' of water harvesting and storage and protection by return to Crown control or other protective mechanism.

Between these extremes there is a gradual transition from converted pasture with scattered matagouri to progressively more dominant tussock cover. This transition extends across the broad interfluvial ridges between the valleys of the Swin Burn and Shag River and the rolling hilly land across the northern part of FH 2 with options for farm development or conservation management.

The decisions to be made in the tenure review process relate to both the requirements to protect SIVs and the opportunity to promote ecologically sustainable land use on those parts of the property with the best prospects for sustainable farm development. Our view is that such decisions should be made on the inherent characteristics of the land, as indicated by LUC classification and soil and vegetation condition and potential.

Decisions at the extremes of the continuum are easy and are well exemplified by the proposed designation of freehold disposal on the valley floor, and Conservation management (CA1 or CC1) in the NE corner of the property . The difficult decisions relate to the designation of boundaries between CA1 and CC1; and between CC1 and FH2.

As indicated above, FMC supports the designation of the highest land with both SIVs and ecosystem services of water harvesting and storage in the far NE corner of Longlands to be designated as CA1. Its proposed boundary with CC1 approximates to the 900m contour with many similar soil and vegetation characteristics continuing downslope to the State Highway. The Conservation Resources Report (CRR) does not appear to note any significant vegetative change with altitude within the area described as "Head of Long Gully and western slopes of Shag Valley". We note that CA1 is described in the PP summary *as "part*

*of a continuous area of tall tussock grassland which extends from SH85 to the upper reaches of the Kakanui Mountains (the balance of which is proposed for protection as a covenant)".*

The upper slopes of Long Gully support a population of coral broom (*Carmichaelia crassicaule*). On our field inspection, we discovered that this had been recently burnt.

#### Submission

We recommend that the area from SH 85 up to the lower boundary of CA1, and within the area described as Head of Long Gully and western slopes of Shag Valley should be added to CA1.

#### Further comments on CC1

The balance of the proposed freehold area (including the balance of CC1) consists of a mix of converted pasture, shrubland and both short and tall tussock which may not be sustainable without management with specific objectives.

There is little or no indication in the Summary of the PP as to what values CC1 is intended to protect, nor is there any indication of the rationale regarding the siting of the boundary between CC1 and FH2. However, Schedule 1 of Appendix 5 (Form of the Conservation Covenant CC1) does state that the values of the land to be protected include *"the landscape amenity of the land and freshwater life on and habitat of the land (sic)."*

Schedules 2 and 3 establish the conditions and monitoring regime which are designed to achieve the protection of those values. FMC supports the proposals for the protection of values within CC1 and is particularly pleased to note that the landscape amenity values are specifically recognised.

#### Submission

FMC supports the intention to protect the landscape amenity values of the land in the proposed Covenant CC1.

#### Comments on FH2

From our inspection in February 2015 and from a knowledge of the LUC classification of the proposed freehold country (mostly LUC Class IV and VI) there is an expectation that the land should be able to support ecologically sustainable pastoral use, and therefore be suitable for Freehold disposal.

FMC believes that there is as responsibility inherent in the tenure review process to implement the objective of the CPL Act and to *"promote the management of the land in a way that is ecologically sustainable."* To us that means both now and into the foreseeable future.

A number of observations including stock management which appears to be conservative and includes burning as a management tool, and the present vegetative cover with a

mixture of vegetation communities suggests that present land use may not be sustainable and presently not appropriate for freehold disposal. In order that the freehold area FH2 is managed in a way which promotes the ecologically sustainable land use it seems to us that it will be necessary to set management objectives and practices which are designed to ensure that this objective is achieved. It is possible to define conditions of land use on areas protected by conservation covenant, but it is not possible to impose management controls on land under freehold tenure unless some form of enduring protective covenant has been agreed as part of the tenure review process. Such enduring protection (with appropriate conditions intended to achieve sustainable land use) could be established through the tenure review process and should continue into a future which might include changes in ownership and land use.

### Submission

We therefore recommend that an enduring Covenant such as a Sustainable Management Covenant with appropriate conditions of stocking rate, grazing management and prohibition of burning should be agreed to over the area designated FH2 and registered on the property title as an outcome of this tenure review.

## 5. **Qualified Designation** - Easement a-b-c-d

### Comments

The importance of access to CA1 and beyond lies in the long term possibility of establishing a "Long Distance Path" along the crest of the Kakanui Mountains from the Horse Range to Danseys Pass. Such a path would require access and exit points along its length and the public access over Longlands from SH85 could be particularly important in this regard.

There seems to be a contradiction (or confusion) between the map showing access routes in orange (a-b-c-d) and in red (b-c), and the text in the summary document which states that *"the easement is for public foot, non-motorised vehicle and horse access and conservation management purposes access along the boundary fenceline."*

The confusion seems to arise because there are two ways of getting from "b" to "c", but the text provides the additional information that the route is approximately 3.9 km in length and is therefore probably the orange route which is closer to the fenceline.

The confusion is compounded by the statement that *"This is marked "a-b" and "c-d" on the plan"* - that is two separate and discontinuous sections of the route (omitting reference to the middle section "b-c". What is clear is that the section "b-c" marked in red is for conservation management purposes only, so presumably the public foot, bike and horse route is the longer route marked in orange throughout its whole length.

Although this will be a valuable access to the Conservation Area CA1, and to the existing conservation land beyond, right up to Kakanui Peak, the more direct route would be much preferred for public use, especially by mountain bike. It should be noted that if our recommendation that the area described as "Head of Long Gully and western slopes of Shag Valley" is added to CA1, then public access would be possible over the farm track "b-c" in red, thus providing a much better route from a recreational perspective.

Ideally a second public access route from SH85 would be included close to the western boundary of Longlands to Kakanui Peak, thus opening up an opportunity for a scenic round trip as suggested in the FMC Preliminary Report (2012).

### Submission

We recommend that the description of the route (a-b-c-d) to be followed by the public access easement should be clarified. It is pointed out that this would be much improved if mountain bike use of the farm track (“b-c”) was permitted, as would be the case if the area described as “Head of Long Gully and western slopes of Shag Valley” was added to CA1 as recommended above.

A second public access route up the western boundary of Longlands and on up to Kakanui Peak would provide a great new opportunity for a scenic round trip, easily accessible from SH85.

## 6. **Conclusion**

Finally, FMC is grateful to the Commissioner for Crown lands for this opportunity to comment on the proposals for the tenure review of Longlands Station, and to the landholder, Mr Geoff Preston, for allowing us to inspect the station.

We trust that serious consideration will be given to our submissions.

Yours faithfully

Peter Wilson  
Vice President, Federated Mountain Clubs of NZ Inc.

## **Submission 8**



Commissioner of Crown lands

CBRE House, 112 Tuam St

Private Bag 4721

Christchurch 8140

RE. Submission on Longlands Tenure Review Proposal

To whom it may concern,

We, as holders of the adjoining lease (PL360) to the property stated above, are very concerned with certain aspects of the proposed tenure review and how they will affect the way we manage our business on the adjoining land. Some of these issues include;

- Disturbance of stock at critical times of the year alongside the proposed access on the lease boundaries, and financial loss from these disturbances (ie lamb deaths, late summer and autumn grazing management).
- Health and safety issues (Unpredictable cows, calves and bulls grazing alongside proposed walkway. Large mobs of stock in holding yard).
- Hunting and hunters. Any hunting on the retired ground should be by ballot only and notification must be made to the current lessee and owner, as hunters on adjoining land will have no idea who or when other persons are in the area.
- Weed and Pest. Introduced and evasive flora can become a problem once ground is retired.
- Fire. Any and all retired ground becomes a fire risk to all surrounding areas as dead vegetation builds up in summer dry climates.

Possible solutions to some of these issues;

Stopping all public access to retired ground between the dates of 20<sup>th</sup> September through until the 15<sup>th</sup> of November. Lambing and calving dates

Shifting access away from the boundary to formed track.

Hunting by ballot only, Notification to current lessee and owner.

Strategic grazing can mitigate weed spread and fire risk.

Thank you for the opportunity to put forward this submission.

Cassie and Sean Becker, DJ & JC Andrew