

## Crown Pastoral Land Tenure Review

Lease name : *MARYBURN*

Lease number : PT 041

### Public Submissions Part 1

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*

*12*

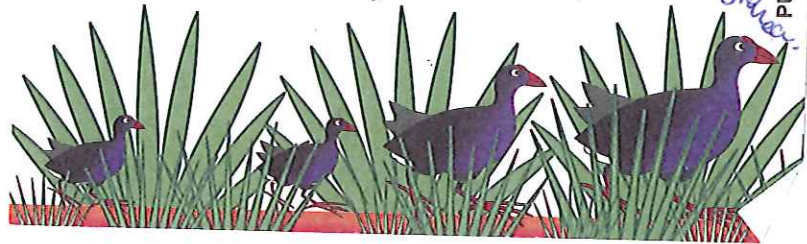


NEW ZEALAND

Also please, do not  
privatise Meryburn!  
and never allow  
to have houses and  
buildings and parking  
lots around like  
Pukeki.

Thank you Pede

PUKEKO



1st March 2011

Darrock Ltd.,  
P.O. Box 143  
Chimblechurch  
A.M. Tony Shorpe

127001

Dear Sirs and Mr. Shorpe,

please  
forgive me for sending you these  
pages and not my personal  
words regarding the

"Submission on preliminary  
tenure review proposal for  
Maryburn pastoral lease"

I found  
these pages - of such important  
content to me - very well,  
concisely and clearly presented  
in every single aspect.

Having  
lived in the Mackenzie country

For over eight years, I cannot think that today, someone won't change for ever that so special kind of landscape. This, in fact, has always been the characteristic of this part of High Country.

The meadows have to return in great numbers. The tussock, the grasses, the shrubs, the wetlands and all the threatened plants and birds have to be protected and be there for ever.

The future of Tourism will benefit <sup>with</sup> keeping the Mackenzie Country with no further changes.

Please withdraw this Preliminary Proposal for Maryburn's Place.

With kindest regards,  
from  
Tade Stora.

Xxx February 2011

Address

Darroch Ltd  
 PO Box 143  
 Christchurch  
 Attn: Tony Sharpe  
 Tony.sharpe@darroch.co.nz



127 001

**SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR MARYBURN PASTORAL LEASE**

**Preliminary proposal summary**

I understand the preliminary proposal to be:

- a) 3,430 ha. of Tekapo River terraces to be restored or retained in full Crown ownership and control as conservation area (CA1 marked in pink) subject to an easement for farm management purposes "a-b" and "c-d". The concessionaire is able to install, maintain and repair a stock and irrigation water supply system over "c-d".
- b) 4,946 ha. to be freeholded and disposed subject to a sustainable management covenant (SMC marked in yellow) over a portion of that land.

**Submission**

This submission requests that the Preliminary Proposal for Maryburn be withdrawn as it fails to implement the objects of the Crown Pastoral Lands Act, (CPLA) 1998. It fails to protect extensive areas with significant inherent values including the extensive Maryburn outwash plain, the moraines between Lake Pukaki and the crest of the Mary Range, the eastern slopes of Mary Range, Mary Burn Stream and wetlands, and the northern wetland. These areas have been identified by expert botanists, entomologists, ecologists and Department of Conservation staff as having outstanding significant inherent values (SIVs) that warrant protection as public conservation land under Part 2 of the CPLA.

The proposal should be withdrawn and renegotiated to ensure protection of the SIVs and then renotified for public submissions. [The renegotiation should be informed by the outcomes of the collaborative planning process that Government has initiated in the Mackenzie.

**The specific aspects of the proposed preliminary proposal that do not meet the objects of the Crown Pastoral Lands Act 1998 include:**

- 1) Proposed freeholding of Maryburn outwash plain, a large triangle of land between SH8 and Tekapo River

This area should be protected as conservation land to protect the full range of SIVs - the unique vegetation communities and species on the full suite of fluvio-glacial outwash and younger alluvial terrace and floodplain features. This is one of the classic Mackenzie landscapes of short tussock-covered outwash plain supporting a mosaic of vegetation including rare and threatened plants.

The land identified as a Sustainable Management Covenant (SMC) should be included as public conservation land as it contains dryland species and systems that complement the adjoining area.

- 2. Proposed freeholding of lands between Lake Pukaki and crest of Mary Range - including Pukaki lateral moraine

The area should be protected as conservation land for its SIVs, including the nationally significant terminal moraine site, the acutely and chronically threatened plants, the outstanding sequence of significant ecosystems, including short tussock grasslands and remnant shrublands on low hill country, alluvial terraces, stony fans and terraces, kettleholes and turf communities.

3. Proposed freeholding of eastern slopes Mary Range with no landscape covenant

This area requires a sustainable land management or a landscape covenant to protect the outstanding landscape SIVs as it is relatively unmodified with few structures and a significant feature when viewed from SH8.

4. Proposed freeholding of Mary Burn Stream and wetlands

At least 3 km of the stream and its riparian shrublands and catchment should be protected as a conservation area. It is habitat for threatened longfin eel, koaro, black-fronted tern, black stilt and banded dotterels. Freeholding would not promote the ecologically sustainable management of the stream and wetlands because of the impact of continued stock grazing.

5. Proposed freeholding of northern wetland connected to Maryburn Stream

Wetlands are a priority habitat for protection. This site of special wildlife interest for birds should be protected by a s77 Reserves Act covenant to ensure ecologically sustainable management. Ongoing grazing will result in continued degradation otherwise.

6. The extensive freeholding on Maryburn will not promote ecologically sustainable management. Continued grazing and pastoral intensification of wetlands, short tussock grasslands, shrublands and other communities with SIVs will degrade their healthy functioning and replace indigenous vegetation and habitats with exotic grasses.

The Commissioner of Crown Land

Darroch Ltd

Box 143

Christchurch



SUBMISSION FOR TENURE REVIEW OF

MARYBURN

From

Ian Douglas Wishart

Box 327, Palmerston North

*iangdouglas@inspire.net.nz*

This is independent submission, I am not part of any advocacy group. Submission written in brief note form.

**Summary Statement**

I oppose Tenure Review [TR] in principle for all leaseholds on the Mackenzie Basin. I believe the Land Act 1949 and the CPLA 1998 are not the right vehicles or tools to deal with the land management problems there or elsewhere in the high country. At the very least, TR should be delayed because of current uncertainties. I therefore oppose Tenure Review in the particular case of **Maryburn**. In the case of the preliminary proposal for the **Maryburn** Review, I make the following remarks in the context of current uncertainties.

**A Policy uncertainties**

Preliminary Proposal inappropriate and too early as the issues in the Mackenzie Basin need an integrated approach to reach resolution. This currently taking shape in form of Sustainable Futures Trust and the Water Zone Committee. Undergoing TR now before their deliberations makes no sense. If TR was to occur, at least it should be done for all properties at the same time to make better sense of landscape and flora/fauna protection issues.

**B. Landscape Uncertainties**

The Preliminary Proposal is inadequate in terms of protecting the expansive vistas to the East of SH8, and the lateral moraine area on the Pukaki shores. These vistas are critical to the Mackenzie experience. Freeholding these areas would greatly reduce the chance of permanent protection. **Maryburn's** current application for irrigation consent on the area to the East of the SH8 may indicate the shape of things to come, and the District Plan has irrigation as a permitted activity in the Basin, and so offers little protection.

**C "Status of Indigenous Vegetation" Uncertainties.**

There are issues around [i] the prevalence of rare or threatened ecosystems and species in parts of the Basin and this is relevant for the area of **Maryburn** between the SH8 and the Tekapo River. [ii] the ability of such depleted areas to be rehabilitated to indigenous- only vegetation [iii] the

ability of such mixed short tussock indigenous/exotic mixes to be grazed sustainably. The central question of the importance of the indigenous vegetation [ethical, amenity and ecosystem services] lost by freeholding and turning to exotic pasture, has not been answered, or presented as a cost/benefit analysis to the public. Similarly, the cost/benefit calculation of withdrawing a lot of land from primary production [and the gains for amenity and ecosystem services] has not been presented to the public. Proceeding with Tenure Review without so much important information available and made public, is reckless.

#### D. Economic Uncertainties

There are serious uncertainties about how traditional farming on the land allocated to freehold in the Prelim Proposal will provide a living for farmers without a smorgasboard of inappropriate diversifications out of keeping with the tenor of the Mackenzie Basin. Clearly, adding in land allocated for the Crown will not help as that is, by definition, deemed uneconomic. This raises the question of how to have an integrated economic strategy for the entire Basin. See next point

#### E Vision uncertainties

There is currently no unified vision for the Mackenzie. The default position of everyman-for-himself may not be the best way to go. One possibility is to scrap Tenure Review in the Mackenzie Basin and for the farming community to take the initiative and set up, with LINZ and DOC, a system of truly sustainable farming which may involve being paid to be conservation managers. Fundamentally, if we want to maintain our landscapes and flora heritage, we might have to pay for them.

#### F Preliminary Proposal for Maryburn Illustrates these Uncertainties

The Proposal offers for protection only a fragment of that recommended by experts, and less than that recommended by DOC. Specific areas of concern are: [i] the area to the east of the SH8 toward the Tekapo River needs more protection than that offered. This assemblage of fluvio-glacial and alluvial terraces, with classic short tussock and SIV communities, and incredible views, needs greater protection.

[ii] Pukaki lateral moraine area needs protection for its post-glacial features, assemblages of acute and chronically threatened plants, and more protection from the inevitable pressures of subdivision that freeholding will bring, despite its dubious status, in part, as a Lakeside Protection area.

[iii] the Maryburn stream area, as an extension from that part of the stream in the Wolds run, requires greater protection than that offered in the Proposal. The eel, tern, stilt, and dotterel presence almost suggests conservation area status.

#### SUMMARY

I suggest that Tenure Review is inappropriate NOW for Maryburn because of the above uncertainties. I request that TR be withdrawn.

This request is associated with a submission making a similar request that Tenure Review for The Wolds be withdrawn. It is also associated with a request to the Minister of Lands to either amalgamate all Tenure Reviews for Mackenzie Basin runs, or to withdraw Tenure Review for this area and replace it with other statutory or non-statutory policy.



# Quentin McDonald

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TEL 03 3651189

que@qbit.co.nz



22 February 2011  
Commissioner of Crown Lands  
Darroch Ltd  
PO Box 143  
Christchurch

Re: Tenure Review of "Maryburn"

Dear Sir,

I wish to make a submission on the preliminary proposal for tenure review of the Maryburn pastoral lease in the McKenzie country.

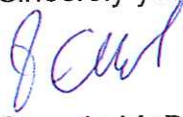
The Maryburn lease is located in an area of considerable importance to New Zealand, both for New Zealanders and visitors from abroad. This iconic landscape is at the heart of an important recreation area and contains vital dry- and wet-land ecosystems. The current proposal fails to protect these critical areas and if implemented risks changing this important area irreparably.

There are several areas of particular importance within the Maryburn pastoral lease. Lake Pukaki, with views of the Mary Range leading up to Aoraki/Mt Cook is at the heart of many visitor experiences. It's important that the visual and natural features of this area are preserved. As such I would seek that Lake Pukaki and the crest of the Mary range be considered for protection as conservation land. There are many items of significant inherent value in these areas including endangered plants and animal habitats. The eastern slopes of the Mary range would be appropriate for a landscape covenant as there are few non-natural features in this area which is widely viewed and admired by visitors and locals alike.

In addition to these largely dryland areas there are some important wetland areas of significant inherent values, especially the Maryburn stream - an important habitat for birds like the black-fronted tern and for the long-finned eel. This area is of such importance it should have protection as public conservation land so that sustainable ecological management can be assured. The Northern wetland area would be appropriately preserved under the Section 77 Reserves Act.

The freeholding of these areas, as currently proposed, would fail to protect these important areas and would, in my opinion, be a disaster for future recreational use, for wildlife and for the McKenzie country as a whole. We need a proposal that will instead promote the management of the reviewable land in a way that is ecologically sustainable. The southern end of the McKenzie has already seen some dramatic changes and in parts it's barely recognizable from even a few years ago. It would be a great loss to the nation if this was to spread further as the result of freeholding of the pastoral leases.

Sincerely yours,

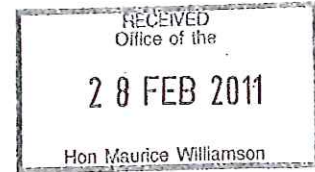


Quentin McDonald

**Quentin McDonald**

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22 February 2011  
Hon. Maurice Williamson  
Minister of Lands and Information  
C/- Parliament Buildings  
Wellington

Re: Tenure Review of "Maryburn" and "The Wolds"

Dear Minister,

It is with some concern that I have learned of the proposals to freehold "The Wolds" and "Maryburn" pastoral leases in the McKenzie country. These are at the heart of an area that is critical both in terms of unique natural habitat and as a recreation area for New Zealanders and visitors alike. After studying the proposals I'm concerned that they make insufficient allowance for protection of the many remaining unmodified features, for protection of landscape and the habitats of native species. There seems to me to be some significant opportunities for the creation of conservation and reserve areas in both the dry and wet-land regions covered by the leases. At the same time we should be working to retain public access to an area that has provided an important recreational area for many New Zealanders, including a number of generations of my own family.

As such I request that the proposals for freeholding of these leases be withdrawn and all proposals for freeholding in the McKenzie country be held at least until the completion of the collaborative process planning for the McKenzie area. Hasty freeholding of this area without consideration of the opportunities for conservation and sustainable management would be a disaster for the McKenzie area.

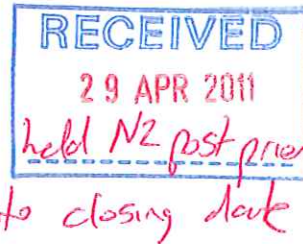
Sincerely yours,



Quentin McDonald

February 2011

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## **SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR MARYBURN PASTORAL LEASE**

### **Submission**

My submission requests that the Preliminary Proposal for Maryburn be withdrawn as it fails to implement the objects of the Crown Pastoral Lands Act, (CPLA) 1998. It fails to protect extensive areas with significant inherent values including the extensive Maryburn outwash plain, the moraines between Lake Pukaki and the crest of the Mary Range, the eastern slopes of Mary Range, Mary Burn Stream and wetlands, and the northern wetland. These areas have been identified as having outstanding significant inherent values (SIVs) that warrant protection as public conservation land under Part 2 of the CPLA.

**The proposal should be withdrawn.**

**My submission includes the following points included in the proposed preliminary proposal that do not meet the objects of the Crown Pastoral Lands Act :**

- Proposed freeholding of lands between Lake Pukaki and crest of Mary Range – including Pukaki lateral moraine. The area should be protected as conservation land for its SIVs, including the nationally significant terminal moraine site, the acutely and chronically threatened plants, the outstanding sequence of significant ecosystems, including short tussock grasslands and remnant shrublands on low hill country, alluvial terraces, stony fans and terraces, kettleholes and turf communities.
- Proposed freeholding of Maryburn outwash plain, a large triangle of land between SH8 and Tekapo River. This area should be protected as conservation land to protect the full range of significant inherent values (SIVs). This is one of the classic Mackenzie landscapes of short tussock-covered outwash plain.
- Proposed freeholding of eastern slopes Mary Range with no landscape covenant. This area requires a sustainable land management or a landscape covenant to protect the outstanding landscape SIVs as it is relatively unmodified with few structures and a significant feature when viewed from SH8.

- Proposed freeholding of Mary Burn Stream and wetlands. At least 3 km of the stream and its riparian shrublands and catchment should be protected as a conservation area. Freeholding would not promote the ecologically sustainable management of the stream and wetlands because of the impact of continued stock grazing.
  
- Proposed freeholding of northern wetland connected to Maryburn Stream Wetlands are a priority habitat for protection. This site of special wildlife interest for birds should be protected by a s77 Reserves Act covenant to ensure ecologically sustainable management. Ongoing grazing will result in continued degradation otherwise.
  
- The extensive freeholding on Maryburn will not promote ecologically sustainable management. Continued grazing and pastoral intensification of wetlands, short tussock grasslands, shrublands and other communities with SIVs will degrade their healthy functioning and replace indigenous vegetation and habitats with exotic grasses. The impacts of cultivation and pastoral intensification will be irreversible and will not meet the objectives of the Crown Pastoral Lands Act.

Yours sincerely, Ben Woolcombe, concerned citizen.

PS. The lakesides need to be preserved for everyone to enjoy, rather than by a few house and lifestyle block owners. We all know the Lake shores in Europe have been subdivided and privatised to the exclusion of the general public access. This is the inevitable outcome if the Tenure Review goes ahead as planned for these areas.

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*prior to closing date.*

The Commissioner of Crown Lands  
Darroch Ltd  
P O Box 143  
Christchurch

### **SUBMISSION ON PRELIMINARY PROPOSALS FOR TENURE REVIEW ON THE WOLDS AND MARYBURN LEASES IN THE MACKENZIE COUNTRY**

- **The Mackenzie country**, in its entirety, is a visual history of our past from ancient times up to the present day. Tectonic upheaval and glaciation together with climatic extremes has produced glorious scenery and special landforms such as kettlehole wetland and unique high country plant species, *Aciphylla*, *Carmichaelia*, tussocks etc, which provide habitat for equally unique animal life, lizards, grasshoppers and specialized insect life etc. The hundreds of native plants and animals that live in the McKenzie basin and surrounding hills greatly add to both New Zealand's total species list and that of the world.
- **The landscapes, plants and animals** of the McKenzie basin and surrounding area are 'significant inherent values' identified under the Crown pastoral Lands Act 1998 (CPLA) and must be protected preferably under full crown ownership and control. This area has been recommended for a McKenzie public conservation park.
- **After European settlement** international botanists and zoologists quickly recognized that New Zealand's flora and fauna were like no other and systems were established to protect them. In addition to plant and animal life the landscapes were recognized by geologists and other earth scientists as revealing an amazing past history.
- **The ancient glaciated landscapes** displayed so vividly in the McKenzie area are New Zealand's equivalent to European monuments such as the white cliffs of Dover, Giant's Causeway, Maiden Castle etc. This landscape, tussock foreground and mountainous backdrop, is equal in magnificence and for scientific value to any in the world. This fact is supported by the

huge numbers of visitors to the area and under the CPLA Section 24 ( c ) (1) has to "make easier the securing of public access to and enjoyment of reviewable land".

- **These vistas** have remained visible for all to enjoy because the land has been lightly used by leasehold sheep farmers.  
The current proposals to sell off large areas of McKenzie country ie The Wolds and Maryburn, would be devastating for this land.  
The irrigation and greening of it would cause the extinction of most plant and animal species which evolved here.  
The small areas proposed for conservation will be swamped by the effects of development.
- **Sub-division**, buildings, suburban home gardens and exotic forestry will artificially partition the landscape and destroy the continuum of vistas which attract nearly a million tourists a year who put \$4 billion annually into the economy.
- **Irrigation** will irreversibly destroy the 68 rare and threatened local plant species and therefore the animal life dependant on it. A vast amount of water is required to maintain a dairy farm and this will come from the clear mountain braided rivers which themselves are special and which support native fish, insects the rare black stilt and other bird species. Fertilizer run-off and effluent will be devastating for the ecosystems and food chains which support the plant and animal life
- Most of the least modified land with high conservation values in the McKenzie country is crown-owned pastoral lease, owned by all New Zealanders. Freeholding this before the outcome of the collaborative process would deny New Zealanders their inherited rights and responsibilities.
- The Mackenzie should be a dry-land conservation park managed by the Department of Conservation which is qualified to protect the natural values New Zealanders care for and which we have a responsibility globally to look after.
- QEII covenants that the government presumes will protect the wild life values will fail as such covenants do not necessarily allow for public access, are difficult to enforce and have no public accountability. New landowners may have no knowledge of the special nature of local flora and fauna and no knowledge of how to care for it. If their main focus is on making money they are unlikely to worry about the care of species.

- **The Maryburn and The Wolds** tenure review proposals offer no protection for most of the important features that are a part of the land under lease.

**The Government should develop a strategic vision to protect the Mackenzie, including:**

1. A Mackenzie drylands park in the northern part of the basin.
2. A halt to tenure review.
3. Proper protection for landscapes and biodiversity on all remaining pastoral leases.
4. Proper protection for the lakes and lakeshores, rivers and their margins.
5. An end to ecologically destructive land use changes.
- 6, All political parties should adopt policies which will protect the high country and Mackenzie's biodiversity and landscapes.
7. The collaborative process should be given time to develop and function fully for the best outcome in the Mackenzie.

Signed: Gillian Pollock

