

Crown Pastoral Land Tenure Review

Lease name: THE WANDLE

Lease number: PO 328

Analysis of Public Submissions

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

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

ANALYSIS OF PUBLIC SUBMISSIONS

Statement Pursuant To Sec 45(a)(iii) Crown Pastoral Land Act 1998 (for Part 2 reviews, or Sec 88(d) for Part 3 reviews)

THE WANDLE TENURE REVIEW NO 371

1. Details of lease

Lease name:

The Wandle

Location:

7439 State Highway 87, Middlemarch.

Lessee:

Lone Star Farms Limited

2. Public notice of preliminary proposal

Saturday 21 September 2014

The Press

Christchurch

Otago Daily Times

Dunedin

Southland Times

Invercargill

Closing date for submissions: 17 November 2014

3. Details of submissions received

Number received by closing date:

6

Total Submissions received:

7

A cross-section of 3 groups or organisations, 3 statutory bodies and 1 individual is represented by the submissions.

Number of late submissions refused. Nil

4. Analysis of Submissions

4.1. Introduction

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

The following analysis:

- Summarises each of the points raised along with the recorded number (shown in the appended tables) of the submitter(s) making the point.
- 2. Discusses each point.
- 3. Recommends whether or not to allow the point for further consideration.
- If the point is allowed, recommends whether to accept or Not accept the point for further consideration.

The points raised have been analysed to assess whether they are matters that are validly-made, relevant to the tenure review and can be properly considered under the Crown Pastoral Land Act 1998 (CPLA). Where it is considered that they are the decision is to allow them. Further analysis is then undertaken as to whether to accept or not accept them.

Conversely where the matter raised is not a matter that is validly-made or relevant or can be properly considered under the CPLA, the decision is to **Disallow**. The process stops at this point for those points disallowed.

The outcome of an accept decision will be that the point is considered further in formulation of the draft SP. To arrive at this decision the point must be evaluated with respect to the folloying:

The objects and matters to be taken into account in the CPLA; and

Whether the point introduces new information or a perspective not previously considered; or

Where the point highlights issues previously considered but articulates reasons why the submitter prefers an alternative outcome under the CPLA; or

Is a statement of support for aspects of the Preliminary Proposal which can be considered by the Commissioner when formulating the designations for a Substantive Proposal.

How those accepted points have been considered will be the subject of a Report on Public Submissions which will be made available to the public. This will be done once the Commissioner of Crown Lands has considered all matters raised in the public submissions in formulating a Substantive Proposal.

4.2. Analysis

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not accept
1	The submitters suggest CA1 should be increased to include part or all the land in CC1		Allow	Not accept

Rationale for Allow:

Section 24(b) of the CPLA is to enable the protection of the SIVs of the reviewable land and as this point relates to the protection of the SIVs it is therefore allowed.

Rationale for Not Accept:

The point does not meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. While this point meets the objects and matters to be taken into account in the CPLA, it does not introduce any new information or a perspective not previously considered. The boundary of CA1 was widely discussed during consultation. The holder initially considered all the Last Creek catchment should be freehold with the ability to graze cattle as is currently the case. In our meeting on 10 September 2013 we discussed a number of options including excluding cattle or establishing a minimum number of cattle. It became apparent that any cattle grazing would impact on the creek margins.

The current option seeks to protect the core values by including them in CA1 and thereby excluding grazing completely. The areas mentioned by the submitters contain areas with SIV's and also areas with economic farming values. While the use of a covenant in these areas could be considered a compromise, when considered in the wider context of the total proposal, is a legitimate means of protection under the CPLA. The submitter does not introduce any information that has not already been considered.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
2	The submitters consider CA1 should be designated as a reserve under the Reserves Act. This follows concerns about the lack of protection afforded Stewardship land.		Allow	Accept

Rationale for Allow:

The object of Section 24(b) of the CPLA is to protect the SIVs identified on the reviewable land and the point raised by the submitter relates to the protection of the values. This point is therefore allowed.

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point highlights issues previously considered but articulates reasons why the submitter prefers an alternative outcome under the CPLA and the point introduces new information or a perspective not previously considered. The submitters are concerned that conservation land created from tenure review is considered Stewardship land by DoC and as a consequence the SIV's will not be adequately protected. This aspect has not been considered as part of the preliminary proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
3	The submitters fully support CA1	2, 3, 5, 6	Allow	Accept

Rationale for Allow:

The object of Section 24(b) of the CPLA is to protect the SIVs identified on the reviewable land and the point raised by the submitter relates to the protection of the values. This point is therefore allowed.

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
4	Submitters support the easement concession g-h	2, 4, 5	Allow	Accept

Rationale for Allow:

Section 36 CPLA provides for Qualified Designations and S36(1)(a) for the granting of a concession to a person specified in the proposal. This point is therefore allowed

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
5	Submitters would like a landscape covenant over the front faces	2, 4, 5	Allow	Accept

Rationale for Allow:

The object of Section 24(b) of the CPLA is to protect the SIVs identified on the reviewable land and the point raised by the submitter relates to the protection of the values. This point is therefore allowed.

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point introduces new information or a perspective not previously considered. The protection of the landscape values of the front faces was not something that was sought by DoC, and therefore not specifically discussed during consultation.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
6	Support for freehold disposal of the reviewable land.	2, 5	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(ii) of the CPLA is make easier the freehold disposal of the reviewable land and as this point relates to this object it is therefore allowed.

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
7	Submitters would like to see sheep only grazing in CC1	2, 5	Allow	Not accept

Rationale for Allow:

The object of Section 24(b) of the CPLA is to protect the SIVs identified on the reviewable land and the point raised by the submitter relates to the protection of the values. This point is therefore allowed.

Rationale for Not Accept:

The point does not meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. While this point meets the objects and matters to be taken into account in the CPLA, it does not introduce any new information or a perspective not previously considered. This matter was widely canvassed during the consultation process. The point does not articulate reasons why the submitter prefers an alternative outcome under the CPLA.

This point follows on from the matter raised in point 1, and the same reasons apply here. Sheep only grazing was discussed during consultation on 10 September; however Cattle grazing were seen as important if this area was to remain productive in the future. While the reversion of this area back to native would be welcomed by the submitters, this would not necessarily meet the objects of the CPLA for land that is capable of economic use.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
8	Submitters support DoC management access over c-d-e and d-f	2, 5	Allow	Accept

Rationale for Allow:

The object of Section 24(b) of the CPLA is to protect the SIVs identified on the reviewable land and the point raised by the submitter relates to the protection of the values by providing access for conservation management. This point is therefore allowed.

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
9	Submitters want public foot and mountain bike access over c-d-e and d-f	2, 4, 5	Allow	Not Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed.

Rationale for Not Accept:

The point does not meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. While this point meets the objects and matters to be taken into account in the CPLA, it does not introduce any new information or a perspective not

previously considered. The submitter does not articulate reasons why they prefer an alternative outcome under the CPLA. The need for the public to use the farm track was discussed during consultation and thought not necessary. Access is provided to CA1which will provide public access to the upper parts of the Rock and Pillar Ranges. If there is demand for an access route up Last Creek, the development of a more practical track is a post tenure review management issue for DoC.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
10	Submitters support public access easement a-b.	2, 3, 5	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed.

Rationale for Accept:

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As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
11	The submitters support the continuation of an existing easement i-	2, 4, 5	Allow	Accept

Rationale for Allow:

Section 36 CPLA provides for Qualified Designations and S36(3)(c) for the continuation in force of an existing easement in the proposal. This point is therefore allowed

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow
12	The submitter suggests the proposal summary is deficient in detail surrounding the reasons for public access, public access documentation relating to the closure of the easements and access for mountain bikes.	3	Disallow

Rationale for Disallow:

The summary is provided to assist submitters in their understanding of the proposal. There is no requirement for the Commissioner to provide this summary under the CPLA. The point is therefore disallowed.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
12a	The submitter is not sure how the public will access easement a-b	3	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point introduces potentially new information or a perspective not previously considered. It was thought the easement running through the adjoining property touched the boundary of The Wandle at point "a" as there was a marker post at this point. Plans provided by the submitter suggest this may not be the case.

Point	Summary of point raised	Submission numbers	Allow or Disallow
12b	The submitter is concerned about a standard clause in all DoC easements tha allows the grantee (Crown) the right to close the easement to the public.	3	Disallow

Rationale for Disallow:

The legal documents included as part of the proposal are provided by DoC and Clause 6.1 is a standard term in all DoC easements. This clause is designed to allow the Minister of Conservation to close the easement if it is unsafe or is being misused by the public,

The drafting of the legal documents is the responsibility of DoC and the Commissioner relies on the Director General of Conservation to provide documents that are legally correct. The point is therefore disallowed.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
12c	The submitter is concerned about the restrictions on horse and mountain biking on easement a-b.	3	Allow	Not Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed

Rationale for Not Accept:

The point does not meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. While this point meets the objects and matters to be taken into account in the CPLA, it does not introduce any new information or a perspective not previously considered.

The decision not to allow horses and bikes on the easement was made following consultation with the holder and DoC. The easement provides access to CA1 and access within CA1 is a matter for DoC and not the Commissioner.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
13	The proposal relies on access through adjoining land. This is not consistent with advice we have received from the CCL	3	Allow	Not Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed

Rationale for Not Accept:

The point does not meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. While this point meets the objects and matters to be taken into account in the CPLA, it does not introduce any new information or a perspective not previously considered. The submitter does not articulate reasons why they prefer an alternative outcome under the CPLA.

There is no requirement that access to proposed conservation areas needs to be over the reviewable land, particularly when existing access from adjoining land is available. In this case there is already good access to the proposed conservation area over easements created on adjoining properties to the north and south.

Point	Summary of point raised	Submission numbers	Allow or Disallow
14	Submitter is concerned the standard easement document is confusing and could mislead the public. This relates to standard clause 2.1 and clause 14 in the Special Easement Terms.	3	Disallow

Rationale for Disallow:

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The legal documents included as part of the proposal are provided by DoC and Clause 2.1 is a standard term in all DoC easements. Any variation to this clause is included in the "Special Easement Terms". The drafting of the legal documents is the responsibility of DoC and the Commissioner relies on the Director General of Conservation to provide documents that are legally correct. The point is therefore disallowed.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
15	Submitter suggests public vehicle access by DoC permit be included over c-d-e and e-f.	3, 4	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point introduces new information or a perspective not previously considered. Public vehicle access by DoC permit over the route suggested has not been considered during the preparation of the preliminary proposal as DoC did not consider this a suitable public vehicle access route.

Point	Summary of point raised	Submission numbers	Allow or Disallow
16	Submitter wants public access managed under the Walking Access Act 2008	3	ALLOW + ACCEPT

Rationale for Disallow: LINZ HAS DISALLOWED THIS POINT IN ERROR

The CPLA does not provide for easements under the Walking Access Act. This is therefore not a matter the Commissioner can consider. The point is therefore disallowed.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
17	Submitter wants a new easement created from Wandle Road along an existing fence line to provide an alternative access to a-b.	3	Allow	Accept

ATIONALE FOR ALLOW: THE OBJECT OF SECTION 24 (PUBLIC ACCESS AND ENJOYMENT OF THE REVIEW ATES TO THIS THE POINT IS THEREFORE ALLOWED. THE SECURING NITTER RAISED

RELATES TO THIS.

2015.03.26-The Wandle-Public Submission Analysis(Final)

RATIONALE FOR ACCEPT THE POINT MEETS CRITERIA FOR ACCEPTANCE BY THE COMMISSIONER FOR EURTHER
CONSIDERATION IN FORMULATION OF THE SUBSTANTIVE PROPOSAL. THE POINT INTROPUES NEW INFORMATION OR BE CONSIDERED. THE WALKING ACCESS ACT 2008 WAS NOT CONSIDERED AS A MANAGEMENT APPROACH FOR PUBLIC ACCESS IN PREPERATION FOR THE WANDLE PRELIMINARY PROPOSAL EASEMENTS UNDER THE WALKING ACCESS ACT 2008 ARE A PROTECTIVE MECHANISM AS PROPOSED BY SECTION 40 OF THE CPLA.

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point introduces new information or a perspective not previously considered. Access over the route suggested has not been considered during the preparation of the preliminary proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow
18	Submitter wants to be advised in a timely manner on the outcome of the points raised.	3	Disallow

Rationale for Disallow:

Section 43 of the CPLA sets out the Commissioner's requirement to give notice of the Preliminary Proposal under Section 34 (1) CPLA. There is no requirement for the Commissioner to consult further with submitters and the point is therefore disallowed.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
19	Submitter supports the freehold disposal of the lower part of CC1.	4	Allow	Accept

Rationale for Allow:

Section 24(c)(ii) provides for the freehold disposal of the reviewable land. As this point relates to this aspect, the point is therefore allowed.

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not accept
20	Submitter would like public foot access from the farm track to the upper area of CA1	5	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point, This point is therefore allowed.

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point introduces new information or a perspective not previously considered. Access over the route suggested has not been considered during the preparation of the preliminary proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
21	Submitter suggests public access up Last Creek is not practical.	5	Allow	Not accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed.

Rationale for Not Accept:

The point does not meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. While this point meets the objects and matters to be taken into account in the CPLA, it does not introduce any new information or a perspective not previously considered. The submitter does not articulate reasons why they prefer an alternative outcome under the CPLA.

The practicality of the access up Last Creek is a post tenure review management matter because the access is within the proposed conservation area.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
22	The submitter does not want horse access over a-b	5	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed.

Rationale for Not Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal. The submitter is confused about the easement conditions. Clause 14 of the Special Easement Conditions specifically excludes horses.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
23	The submitter is concerned about the practicality of the access to point "a" on the adjoining property	6	Allow	Accept

Rationale for Allow:

The object of Section 24(c)(i) of the CPLA is to make easier the securing of public access and enjoyment on the reviewable land and the point raised by the submitter relates to this point. This point is therefore allowed.

Rationale for Accept:

The point meets the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. The point highlights issues previously considered but articulates reasons why the submitter prefers an alternative outcome under the CPLA The easement is designed to join the existing easement on Taieri Lake.

The exact location of the easement and where it joins the Taieri Lake easement will be determined during boundary marking. It was our understanding the Taieri Lake easement touched the boundary at Point "a".

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept
24	The submitter gives strong support for the proposal	6	Allow	Accept

Rationale for Allow:

The point relates to the proposal which has been prepared based on the objects under Section 24 CPLA. The point is therefore allowed.

Rationale for Accept:

As the point relates to the objects and matters to be taken into account in the CPLA, and the submitter makes a statement of support for aspects of the Preliminary Proposal, it is accepted for further consideration by the Commissioner in the formulation of a substantive proposal.

Point	Summary of point raised	Submission numbers	Allow or Disallow	Accept or Not Accept.
25	The submitter considers a comprehensive investigation of the heritage values is required.	7	Allow	Accept

Rationale for Allow:

Section 24(b) of the CPLA is to enable the protection of the SIVs of the reviewable land. Heritage values if present could be considered an SIV. As this point relates to the protection of the SIVs it is therefore allowed.

Rationale for Accept:

The historic information provided by DoC in the CRR was based on a report undertaken in 1989 that may not have covered all the areas of historic interest on the lease. The submitter suggests there are a number of other likely historic features that were not inspected in the 1994 survey.

The point does meet the criteria for acceptance by the Commissioner for further consideration in the formulation of a Substantive Proposal. This is because it relates to the objects and matters to be taken into account in the CPLA, the point introduces new information or a perspective not previously considered.

Summary and Conclusion

Overview of analysis

In analysing the 7 submissions received 25 points were identified. Of the 25 points raised, 21 were allowed in total or in part for further consideration. Of the 23 that were allowed, 17 have also been accepted for consideration in the preparation of a draft substantive proposal. This was largely on the basis on the provision of new information or the submitter provided reasons why an alternative outcome should be considered, or was a statement of support for aspects of the proposal. Of the 17 accepted for further consideration 9 were statements of support for aspects of the proposal.

In total there were 28 points raised, of which 17 are "Allowed" and "Accepted" for further consideration, 6 "Not accepted" and 5 points "Disallowed" and will not be considered further.

Generic Issues

There was strong support for the retention of CA1 in Crown ownership; however four of the submitters thought part or all of CC1 should be added to this area. Public access was another point of some concern. There was a feeling that the farm track should be used for access to CA1.

A further point raised was the decision to designate the CA1 as a conservation area rather than as a reserve. The recent release of the Commissioner of the Environment report on Stewardship land has resulted in a change in thinking by NGO's in relation to how the land is designated.

Gaps identified in the proposal or tenure review process

None identified.

Risks identified_

No specific risks have been identified through the public notification process.

General trends in the submitters' comments

The common issues raised were:

The need to included part or all of CC1 in the proposed conservation area.

- · The need for improved public access over the farm track.
- · Support for CA1.
- · A push to have the conservation area changed to a Reserve.
- · Need for a full heritage assessment.

I recommend approval of this analysis and recommendations

David Paterson

Tenure Review Consultant

Rural Value

Date 22/12/2014

Peer Reviewed by

Themste R Taylor

Ken Taylor Principal Consultant Rural Value

Date 22/12/2014

DATE 30/04/2015 AMENDMENT TO POINT 16.

01/05/2015

Approved/Declined

Commissioner of Crown Lands

Date 13/04/15

Appendices

- 1. Copy of Public Notice
- 2. List of Submitters
- 3. Copy of Annotated Submissions