

## Crown Pastoral Land Tenure Review

Lease name : *The Wolds*

Lease number : PT 008

### Public Submissions Part 2

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*

125 623

**Tony Sharpe**

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**From:** Pauline Syrett [syrettp@actrix.co.nz]  
**Sent:** Friday, 18 March 2011 9:31 p.m.  
**To:** Tony Sharpe  
**Subject:** Attention Commissioner of Crown Lands  
**Attachments:** Submission on Preliminary Proposal for The Wolds Tenure Review.docx; ATT00001..htm

We attach our submission on the preliminary proposal on The Wolds tenure review.

We are both professional entomologists, and have undertaken 13 tenure review assessments of invertebrate values for the Department of Conservation under contract to LINZ, including The Wolds.

Rowan Emberson and Pauline Syrett  
14 Rockview Pl, Mt Pleasant  
Christchurch 8081, New Zealand  
033840163  
[rockview@actrix.co.nz](mailto:rockview@actrix.co.nz)

### **Submission on Preliminary Proposal for The Wolds Tenure Review**

We do not support the preliminary proposal. We believe that insufficient account has been taken of the botanical, faunal and landscape values described in the Conservation Resources Report for this property. The areas proposed for retention in Crown ownership should be extended to take account of these inherent values.

1. The area marked CA1 should be extended to the west to include the next terrace riser, which retains significant botanical and faunal values. This also aligns better with the area proposed for retention in the preliminary proposal for Maryburn tenure review.
2. The area of wetland marked R (Scientific) should be extended to include the western part of the wetland including the feeder streams for Mary Burn, and the upper Mary Burn. This wetland has been recognized as the best of its kind in the Mackenzie Ecological Region. The current area recommended is totally inadequate to protect the high natural values that have been well known for a long time.
3. The area recommended for a conservation covenant (CC1) on the western slope of the Mary Range needs to be very much larger than the area marked on the plan to protect the high value shrubland community of plants and animals. This shrubland has been identified as more intact and diverse than the area of shrubland that has been recommended for retention (CA2), so should be retained in full Crown ownership.
4. We do not believe that adequate consideration has been given to protection of landscape values as viewed from State Highway 7.

Rowan Emberson and Pauline Syrett

18 March 2011

125024

**Tony Sharpe**

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**From:** Paul & Isobel Mosley [p.mosley@xtra.co.nz]  
**Sent:** Monday, 21 March 2011 1:42 p.m.  
**To:** Tony Sharpe  
**Cc:** coleman.raymond@xtra.co.nz  
**Subject:** Wolds and Maryburn Pastoral Leases  
**Attachments:** Wolds tenure review-F&B submission.doc; Maryburn tenure review-F&B submission.doc

Dear Tony - please find attached submissions on the above, on behalf of the committee of North Canterbury Branch, Forest & Bird.

Sincerely - Paul Mosley (Secretary)

## **SUBMISSION ON PRELIMINARY PROPOSAL FOR TENURE REVIEW OF THE WOLDS PASTORAL LEASE**

Submitter: Dr. M P Mosley, Secretary, North Canterbury Branch, Forest & Bird

Email: [p.mosley@xtra.co.nz](mailto:p.mosley@xtra.co.nz)

Address for correspondence: The Secretary, Forest & Bird (North Canterbury Branch), P O Box 2389, Christchurch 8140

### **SUBMISSION**

I make this submission on behalf of the Committee of North Canterbury Branch, Forest & Bird. This submission is based on the objects of the Crown Pastoral Lands Act (sec. 24) and the purpose of the Conservation Act.

1. We oppose the preliminary proposal, as it fails to protect the extensive areas of land that have significant, inherent conservation/natural values, including the Maryburn wetland, regionally and nationally significant tussocklands and shrublands, and glacial landforms that have significant scientific and scenic values. We request that the proposal be renegotiated to ensure protection of the significant inherent values of the property, or withdrawn to enable it to be dealt with under the collaborative planning process that has been initiated recently.
2. The Wolds Pastoral Lease has significant inherent values, as defined in section 2 of the CPLA, that justify retention in public ownership of a far greater area than the 10% of the lease that is proposed. The particular values are defined in depth in the Conservation Resources Report. We associate ourselves with the analysis carried out by the national office of Forest & Bird, in terms of the particular values that warrant retention in public ownership (CPLA section 24(b)(ii)). These include distinctive glacial, fluvio-glacial and peri-glacial landforms with quasi-natural vegetation cover; nationally rare wetland ecosystems; indigenous grassland and shrubland ecosystems that are representative of a drastically reduced area of such ecosystems; indigenous fish, bird and other vertebrate species (some threatened) that depend on these ecosystems for survival; highly erodible soils; and water bodies/ resources that are nationally significant (as eventual contributors to the Waitaki river system). In particular, we seek comprehensive protection as public conservation land/scenic or scientific reserves of the whole of the following features that have significant inherent values:

Western slopes and footslopes of Mary Range: glacial (morainal) landscape and lakeside setting, nationally rare wetland ecosystems, dryland vegetation, remnants of pre-human shrubland vegetation, scenic backdrop to Lake Pukaki.

Outwash plain east of Mary Range: remnant indigenous vegetation, and outstanding scenic/landscape values provided by a distinctive fluvio-glacial feature

Tekapo River terraces: geologically Recent outwash terraces supporting ecosystems that are relatively undeveloped for agricultural purposes, and that provide habitat for five threatened plant species, four threatened lizard species, and three threatened bird species.

Northeast Triangle: good quality short tussock grasslands

Maryburn wetland and Maryburn stream: the wetland is one of the few remaining in the Basin, supporting nine threatened bird species and three threatened plant species. The tributary streams support the threatened bignose galaxias.

Paterson's Ponds: these artificial ponds provide habitat for threatened bird species, and also have recreational values.

3. It is inappropriate for this pastoral lease to be considered in isolation from neighbouring properties, because a viable scenic/scientific reserve would take in parts of approximately seven properties. The core area of such a reserve has been defined in particular by the work of Landcare Research scientists, and full account of this work should be taken.

4. Freehold tenure would set the stage for intensive development for agriculture that would destroy for all time the most distinctive features of this leasehold land. In particular the wetlands, kettle holes, and streams are at risk; these are a remnant of such features that formerly existed far more extensively in this locality and elsewhere in the Province, and they are of critical importance in terms of "ecosystem services".

5. History has shown that sustainable management of these soils and landforms is extraordinarily difficult because they are highly erodible and infertile. Soil loss by, in particular, wind and sheet erosion and impoverishment of the vegetative soil cover – not to mention the issue of invasive plant species and herbivores – are such a threat that retention in public ownership for conservation purposes is in the national interest.

6. Steps are being taken to develop a Basin-wide approach to sustainable management of the Basin's natural resources, through the Mackenzie Sustainable Futures Trust. It is completely inappropriate for this tenure review to proceed, for the benefit principally of one leaseholder, thereby ignoring the interests of the community at large.

#### CONCLUSION

The committee opposes the preliminary proposal on the grounds that it fails to achieve the objects of the CPLA Section 24, by failing to protect extensive areas that have significant inherent values and that would be better held in public ownership for conservation purposes. We request that the proposal should be withdrawn until the collaborative planning process being initiated through the Mackenzie Sustainable Futures Trust has been completed, and in particular until the opportunities for a viable scenic or scientific reserve (or other form of conservation estate) have been fully considered.



Secretary, North Canterbury Branch, Forest & Bird  
21 March 2011

125025

**Tony Sharpe**

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**From:** patrick flannery [patrick.pjflan@gmail.com]  
**Sent:** Friday, 25 March 2011 8:23 a.m.  
**To:** Tony Sharpe  
**Subject:** Submission, The Wolds Pastoral Lease Preliminary Proposal  
**Attachments:** SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR.doc

Dear Mr Sharpe

please find attached copy of my submission regarding the Preliminary Proposal for The Wolds Pastoral Lease. I understand the deadline for submissions has been extended to March 31. A signed hard copy will be posted to you today.

yours sincerely

Patrick Flannery

## **SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR THE WOLDS PASTORAL LEASE**

Commissioner of Crown Lands  
Darroch Ltd  
PO Box 143  
Christchurch  
Attn: Tony Sharpe

BY EMAIL: [tony.sharpe@darroch.co.nz](mailto:tony.sharpe@darroch.co.nz)

### **Submission**

This submission requests that the Preliminary Proposal for The Wolds be withdrawn because it fails to implement the applicable provisions of the Crown Pastoral Lands Act 1998 ("the CPLA") and in particular Part 2 of that Act.

The area comprised by The Wolds Pastoral Lease has numerous natural landscape features of high or outstanding conservation and/or recreational value as identified in the Department of Conservation Report published in June 2004 and is deserving of protection. The Preliminary Proposal would run counter to the need to protect the landscapes currently part of the lease.

Specifically, the Proposal fails to protect extensive outwash plains, the Maryburn wetland and catchment, parts of the Tekapo River terraces, the slopes of the Mary Range, Paterson Ponds and the triangular block of outwash terrace north of the Tekapo Canal which has been identified as having significant values that warrant protection as public conservation land under the objects of Part 2 of the CPLA.

The proposal fails to protect the Mackenzie's valued dryland landscapes. The proposal should be withdrawn and renegotiated to ensure protection of the significant inherent values (SIVs) and then renotified for public submissions. I refer generally in this regard to section 24 of the CPLA and specifically to subsection (b).

The renegotiation should be a part of the outcomes of the collaborative planning "Shared Vision" process which the Government has initiated in the Mackenzie.

My submission includes the following points included in the proposed preliminary proposal that do not meet the objects of the CPLA:

1. **The proposed freeholding of western slopes Mary Range overlooking Lake Pukaki.** To fulfil the objects of the CPLA this area and its significant inherent values need to be protected as public conservation land. It is part of the largest and most intact sequence of lateral moraine glacial landforms and associated dryland habitats and plant communities remaining in the Mackenzie Basin.



2. **Freeholding part of Tekapo River Terraces.** The proposed Conservation Area 1 (CA1) needs to be extended to include the additional areas sought by DoC and identified as having significant inherent values to protect all of these, including habitats for threatened plants, lizards and birds and undeveloped river terraces.
3. **The proposed freeholding of most of the Maryburn wetland and catchment and Maryburn Stream.** To fulfil the objects of the CPLA the whole 765 ha. area sought by DoC and Maryburn Stream and its surrounding shrublands needs protection as public conservation land as an extension to the proposed Scientific Reserve.
4. **Freeholding Southeast Face Mary Range – Landscape Covenant needed.** This area has relatively unmodified landscapes with remnant short tussock grasslands and shrublands that are highly visible from a major tourist route.

Freeholding with no protection expose these faces to risk of earthworks, new buildings and forestry plantings. A Reserves Act landscape covenant is needed to protect the landscapes associated with remaining indigenous vegetation, the uncluttered open landscape and extensive views.

5. **Proposed freeholding of Outwash Plain east of Mary Range and SH8 and North Eastern triangle of Unoccupied Crown Land.** These areas contain important landscape and conservation values associated with threatened environments, habitats and species and relatively natural open, highly visible landscapes adjoining a major road and tourist route. They have significant inherent values which deserve protection as conservation land.

To ensure secure public access and public enjoyment I ask that there be public access to Mt Mary from SH 8 as well as public access along the track from the Pukaki Canal over the existing farm track that lies on The Wolds. It is a key recreation route and Mt Mary has panoramic views overlooking Lake Pukaki.

The extensive freeholding 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.

Cultivation of large areas of land to be freeholded on The Wolds will have an irreversible effect on the landscapes and ecology of the middle Mackenzie Basin.

The Crown should ensure DOC is adequately funded to control the wilding pines that the lessee has abandoned.

Yours sincerely

Patrick Flannery  
17 Ryle Street  
Freemans Bay Auckland 1011

**Tony Sharpe**

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**From:** Alice Doughty [Alice.Doughty@vuw.ac.nz]  
**Sent:** Friday, 25 March 2011 10:17 a.m.  
**To:** Tony Sharpe  
**Cc:** Andrew Mackintosh; Brian Anderson  
**Subject:** Wolds Public Submission  
**Attachments:** Wolds Submission.pdf

Dear Tony Sharpe,

Please find the attached submission regarding The Wolds property tenure review.

Sincerely,  
Alice Doughty

## **Submission for the Tenure Review of The Wolds Property**

Submission by: Alice Doughty, Brian Anderson, and Andrew Mackintosh  
Victoria University of Wellington  
PO Box 600, Wellington

### **I. Introduction**

P1 The glacial moraine systems preserved in The Wolds pastoral lease are of international scientific significance. These moraines, which are long, narrow ridges of rock and sand (figure 1), were deposited by a glacier that filled Lake Pukaki during the last ice age (70,000 to 18,000 years ago). The importance of the moraines is that they mark the past positions of the margins of the Pukaki Glacier. When moraines can also be dated they provide a record through time of past glacier fluctuations, from which past climatic fluctuations can be inferred. We are opposed to the preliminary proposal because it fails to acknowledge the importance of these natural features and does not state any specific conditions to assure continued preservation of these geomorphic phenomena.



*Figure 1 – Lake Pukaki on the left, view looking north, Mt Mary on the right. This image shows the moraines (narrow ridges) on The Wolds land with their evening shadows. Each moraine is an event in past climate where the glacier remained stable while depositing boulders and sand. Photo by George Denton.*

P2 The Pukaki moraines are the centrepiece of a decade-long international project on mapping and dating the glacial geomorphology of the central Southern Alps of New Zealand (Andersen *et al.* (in prep) preview at: <http://maps.gns.cri.nz/website/csigg/> and Figure 2). These moraines are of intense scientific value for three reasons: (a) they are extraordinarily well-preserved, (b) they are particularly amenable to an absolute age dating technique called cosmogenic dating and (c) their location in the mid-latitudes of the Southern Hemisphere mean that they have provide an unique opportunity to help us understand the fundamental driver of the ice-age cycles – which remains one of earth science's great problems.

P3 The phenomenal preservation and extent of the moraines is unlike anywhere in the world. The gently sloping eastern slope allowed the Pukaki Glacier to spread laterally and deposit over twenty moraines that are distinct. Each moraine represents a different time and climate during the last ice age (figure 1). It is a rarity to see so many moraines built next to one another, as found across The Wolds. During deglaciation (melting of the glacier and a return to present-day temperatures), the majority of the melt water from the Pukaki Glacier flowed south and eroded moraines to the south of Lake Pukaki. Fortunately, the melt water did not destroy the moraines east of Lake Pukaki. There has been limited damage to these moraines by humans because of its status as Crown Land.

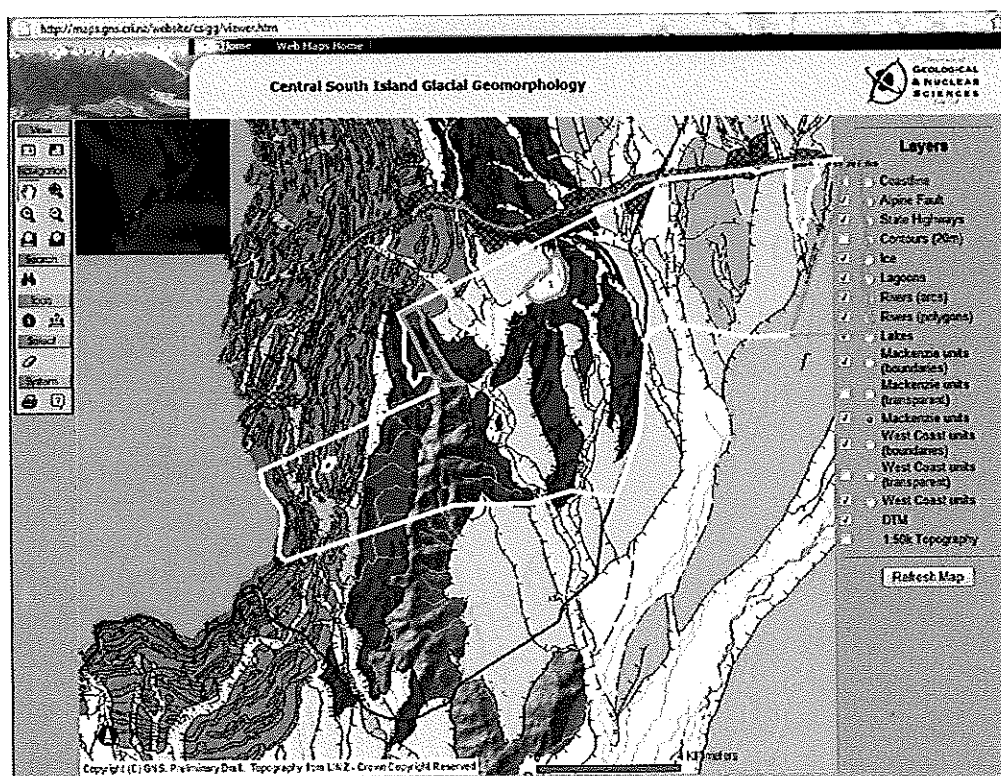


Figure 2 – Section of the Central South Island Glacial Geomorphology map with The Wolds land outlined in white and pink (source: <http://maps.gns.cri.nz/website/csigg/>). Till and moraines are coloured according to age from oldest (green) to youngest (pink and coral).

P4 The glacial landforms on The Wolds land are particularly well-suited for exposure age dating because of the size, extent and preservation of the moraines. The exposure dating technique relies on the assumption that the boulders are in the same position that they were since deposition by the glacier. This ranges in age from 70,000 years ago in the older (green) sequence to 30,000 and 18,000 years ago in the younger (coral and pink) sequences. Doughty and others sampled the top of many boulders that looked as if they have not moved or eroded. Erosion due to river cutting, landform degradation, or boulder surface removal would have destroyed the potential to use this site for exposure dating. If the boulders are rotated, broken, or moved, they are useless for exposure age dating.

P5 The leading theory of what causes ice ages requires the Northern and Southern Hemisphere climatic responses to be opposite, meaning when it is cold in the north, it is warm in the south and vice versa. New Zealand is the prime location to challenge this theory, being one of only three places to retrieve a glacial record from the Southern Hemisphere middle latitudes. Our preliminary results from this area show that the last glacial maximum occurred in two main pulses, similar to the Northern Hemisphere, but thousands of years earlier. This initial finding has huge implications for our understanding of how temperatures and signals are transferred around the world. As a result of a massive project, overseen by

George Denton (University of Maine), David Barrell (GNS Sciences), and Joerg Schaefer (Lamont-Doherty Earth Observatory), New Zealand now has several of the best-dated moraine sequences in the world, but there is still research to do.

P6 At Victoria University of Wellington, we have been collaborating with international researchers in studying these landforms. Only part of this work has been published to date, and Doughty and Mackintosh are co-authors on papers describing the climatic significance of nearby moraines in the journals *Science* (Schaefer *et al.*, 2009) and *Nature Geoscience* (Putnam *et al.*, 2010) – the two most prestigious scientific journals. Doughty, Mackintosh and Anderson are using the mapped moraines and exposure ages to provide constraints on their numerical modelling of New Zealand's ancient glaciers to estimate past climate. Our research leads to publications which promotes New Zealand institutions, draws in international attention and displays the prestige of research in this country.

## II. Significant inherent values under the Crown Public Lands Act 1998

P7 In our opinion the glacial landforms in The Wolds pastoral lease clearly fall within the definition of Significant Inherent Values (SIV) under the Crown Public Lands Act 1998 (CPLA). The definition at s2 is:

*"significant inherent value, in relation to any land, means inherent value of such importance, nature, quality, or rarity that the land deserves the protection of management under the Reserves Act 1977 or the Conservation Act 1987"*

P8 Reserves Act 1977 s20(1) Nature reserves:

*"It is hereby declared that the appropriate provisions of this Act shall have effect, in relation to reserves classified as nature reserves, for the purpose of protecting and preserving in perpetuity indigenous flora or fauna or natural features that are of such rarity, scientific interest or importance, or so unique that their protection and preservation are in the public interest."*

P9 Relating to Reserves Act 1977 s20(1) - Each moraine is unique because it tells a different part of the climate story, no two moraines are the same. The preservation (as mentioned above) of so many adjacent moraines is truly a rare phenomenon. It is this combination of characteristics that draws in immense scientific interest and research projects. The general public are aware of glaciers and their relation to climate change. Educating the public about what these landforms represent leads to a greater respect and understanding of the land around them.

P10 Reserves Act 1977 s21(1) Scientific reserves:

*"It is hereby declared that the appropriate provisions of this Act shall have effect, in relation to reserves classified as scientific reserves, for the purpose of protecting and preserving in perpetuity for scientific study, research, education, and the benefit of the country, ecological associations, plant or animal communities, types of soil, geomorphological phenomena, and like matters of special interest."*

P11 Relating to Reserve Act 1977 s21(1) - New Zealand institutions, including Victoria University of Wellington, Canterbury University and Otago University, visit the eastern slopes of Lake Pukaki annually to show and educate students about glacial geomorphology, ice ages, sediment transport and other geologic processes. The moraines also draw international academic attention from universities from as far as the United States, the United Kingdom, and Austria to name a few. This scenic area has been and will continue to be used as a teaching tool for university students and potentially the public. In addition, moraines are valuable for the paleoclimate, geomorphic and scientific research and study mentioned earlier.

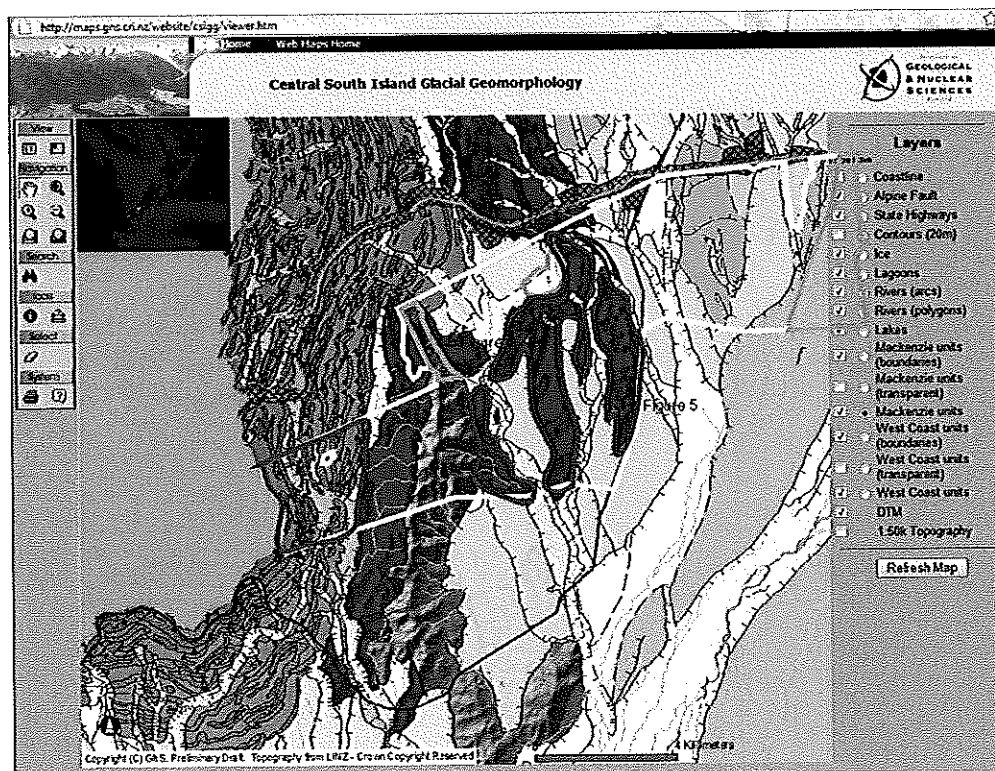


Figure 3 - Section of the Central South Island Glacial Geomorphology map with The Wolds land outlined in white and light pink (source: <http://maps.gns.cri.nz/website/csigg/>). Red outlines depict the areas we propose as SIVs that should be protected from development.

### III. Areas which hold SIVs

P12 As a geologist, Doughty has had the pleasure of working on The Wolds pastoral lease. The lessees were kind enough allow access for geologic inspection and rock sampling. This ground-truthing has been combined with aerial photographs and topographic maps to create maps of the glacial geomorphology on The Wolds pastoral lease and other land in the Mackenzie Basin. Mapping the moraines, outwash, terraces, till and other glacial features was a combined effort of Bjorn Andersen (Oslo, Norway), David Barrell (GNS Sciences, Dunedin) and George Denton (University of Maine, USA) with assistance by some of New Zealand's best glacial geomorphologists. The final map, after over a decade of work, is a masterpiece, with impeccable detail and accuracy. It will soon be available to the public, Crown Royal Institutes and the Department of Conservation. The sample in Figure 2 and available online is only a sample and does not do the full map justice.

P13 These maps allow the delineation of the areas of moraines that have the values that meet the test for SIVs in the CPLA. They also serve as a guide to focus the exposure age dating projects, allowing geologists to pick areas of high moraine density and preservation. Initial, unpublished dates have been plotted on the maps for conference presentations, and this is when theories about New Zealand's climate during the last ice age begin to come together. It is the combination of the moraine map, the exposure ages, and the previous ideas being rejected that makes this work cutting-edge and exciting! Many research opportunities and geologic studies still exist in this area.

P14 More specifically, we consider the moraines east of Lake Pukaki and west of Mary Range (Figure 2, coral and pink features) and the moraines east of Mary Range and west of SH8 (Figure 2, green features) to be SIVs for the scientific and geologic reasons stated above. Therefore, we propose the areas marked in

Figure 3 by dark pink to be protected from development, either by going into DoC's possession or to be restored to or retained in Crown ownership and control.

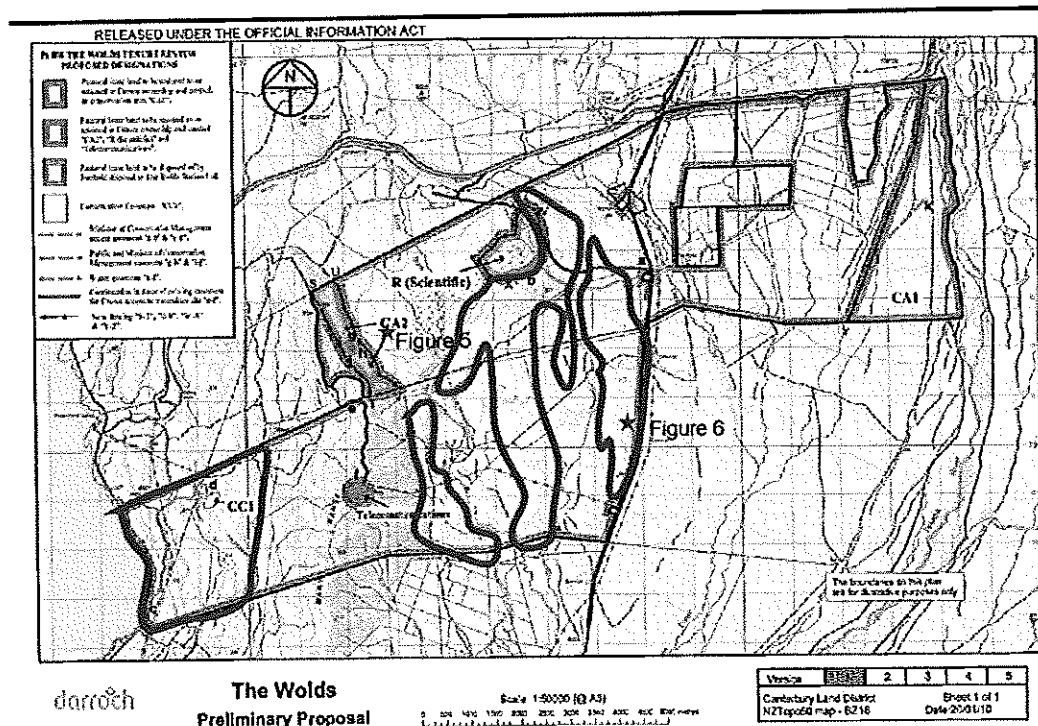


Figure 4 – Modified proposal for The Wolds pastoral lease. Red outlines areas containing SIVs including moraines, boulders, till, and outwash channels. Orange stars mark the locations of Figures 5 and 6.

#### IV. Our Proposal

P15 We are opposed to the preliminary proposal because it fails to acknowledge the importance of most of the glacial landforms and does not state any specific conditions to assure continued preservation of these geomorphic phenomena. It would be a disaster to lose the landscape that is becoming a globally recognised significant site of paleoclimate and cosmogenic dating research in New Zealand. Each boulder removed, turned over, or blown up is a lost opportunity and resource, not only to the Department of Conservation and the scientific community, but to the public as a whole who are rapidly becoming concerned with climate change issues.

P16 We propose a covenant for the areas of hilly moraines (not very suitable for development or irrigation) with the objective that the land must be managed so as to preserve the SIVs.

A. The owner must not carry out or allow to be carried out on or in the land:

1. The erection of any fence, building, structure or other improvement for any purpose;
2. Any burning or chemical spraying;
3. Any cultivation, earthworks or other soil disturbances;
4. Any other activity which might have an adverse effect on the SIVs;
5. Any prospecting or mining for Minerals, coal or other deposit or moving or removal of rock of any kind on or under the land;

B. The owner must:

1. If it is safe to do so, assist the Fire Authority to extinguish any wildfire upon or threatening the land;
2. Keep the land free from rubbish or other unsightly or offensive material arising from the owner's use of the land;



3. Allow a right of access on to the land, with or without motor vehicles, machinery, and implements of any kind for the purpose of research, sampling, or study to the Crown Royal Institutes and internationally recognised universities.

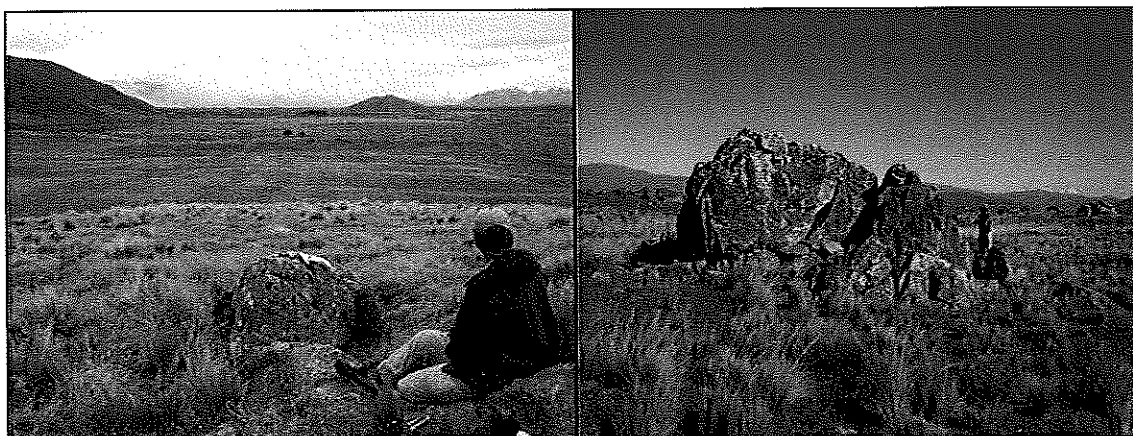
#### C. Description of Land

All that piece of land approximately shown outlined in dark pink on figure 4.

#### D. Values of Land to be Preserved

- The area supports numerous large erratic boulders which are uncommon habitats
- The area represents particularly good examples of this glacial landform
- The moraine surface and soil must not be disturbed
- The boulder surfaces and boulders themselves must not be disturbed or damaged
- These features are significant for education, scientific research, and geologic understanding
- The area supports highly diverse flora and fauna which should remain largely undisturbed

P17 We also recognise the landscape and ecological values of these moraine systems. While we are not qualified to provide expert evidence on those matters it is clear that the scientific values of the moraines would be greatly enhanced if they were protected as part of a continuous landscape. The value of that approach is that it allows future generations to have the opportunities to study the glacial geology of this area using techniques that have yet to be developed. We have concentrated on the boulders on the moraine ridges because they are most valuable for the dating technique that we have used. However future techniques may place greater importance on other parts of the landscape in ways that we cannot predict. What we can be sure of is that, if protected through appropriate land tenure, these moraine systems will remain perhaps the best-preserved mid-latitude moraine systems on Earth, and hence a scientific treasure trove. If a covenant cannot be arranged, we urge that this land remain under the Crown or be considered for Department of Conservation ownership. Thank you for your time and consideration.



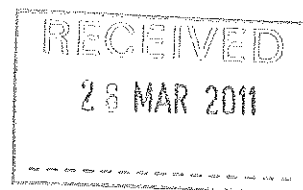
Figures 5 and 6 – Boulders on ridges east of Mary Range, positions are marked on Figure 4 by orange stars.

#### References

- Andersen, B., Barrell, D., Denton, G., Lowell, T., Almond, P., Suggate, P., Hendy, C., Vandergoes, M., Newnham, R., Schlüchter, C., Preusser, F., Schaefer, J., & Chinn, T. (Cartographer). (in prep). *Central South Island glacial geomorphology maps*.
- Putnam, A., Denton, G., Schaefer, J., Barrell, D., Andersen, B., Finkel, R., Schwartz, R., Doughty, A., Kaplan, M., & Schluchter, C. (2010). Glacier advance in southern middle-latitudes during the Antarctic Cold Reversal. *Nature Geoscience*, 3, 700-704.
- Schaefer, J., Denton, G., Kaplan, M., Putnam, A., Finkel, R., Barrell, D., Andersen, B., Schwartz, R., Mackintosh, A., Chinn, T., & Schlüchter, C. (2009). High-frequency Holocene glacier fluctuations in New Zealand differ from the northern signature. *Science*, 324, 622-625.

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26 March 2011

THE COMMISSIONER OF CROWN LANDS  
C/- Darroch Ltd  
PO Box 143  
Christchurch  
Attn: Tony Sharpe  
[Tony.Sharpe@darrochvaluations.co.nz](mailto:Tony.Sharpe@darrochvaluations.co.nz)

Submission on preliminary Tenure Review proposal for The Wolds Station Ltd  
Pastoral Lease

I understand the proposal for the lease is to:

1. designate 600 ha (approximately) of Tekapo River terraces as land to be restored to or retained in Crown control
2. designate 70 ha (approximately) as shrubland on the Mary Range, north east toe slopes, to be restored to or retained in full Crown ownership and control
3. designate 85 ha (approximately) of the Mary Burn wetland to be to be restored to or retained in full Crown ownership and control as a Scientific Reserve
4. designate 7,176 ha (approximately) as land to be disposed of by freehold to the holder
5. designate 2.4 ha on the summit of the Mary Range for a tele-communications reserve (with no public access).

I am very disturbed that almost all of The Wolds is being proposed for free-holding and that a mere 757 ha is proposed for protection.

The Mary Burn wetland is one of the few wetlands still extant in the basin and protecting only 85 ha of the wetland will not be sufficient to conserve and protect the wetlands valuable ecosystems. The entire wetland system should be protected, along with a zone including the Mary Burn stream south of the wetland. More intensive agricultural development around the periphery of the wetland will surely impede successful, long-term preservation.

The free-holding of 7,176 ha of The Wolds would open the door for unprecedented, intensive development in the basin. The Wolds, along with Mary Burn station forms a major part of the scenic landscape one encounters when entering the Mackenzie basin. The beauty of that dramatic landscape is derived from the wide-open space, the feeling of solitude and the majesty of the mountain backdrop. Those views, which hundreds of thousands of tourists visit New Zealand to experience, will be plundered and destroyed if the 7,176 ha of the Wolds are free-held. Folly indeed.

I strongly object to the free-holding of the margins of Lake Pukaki – this should become conservation land with public access available.

Currently water quality in Mary Burn and Irishman's creek is good. If intensive dairy farming, pivot irrigation and intensive fertilising of this land is allowed, the run-off will inevitably end up in the Tekapo river, tributaries and streams on the property. Canterbury waterways are already suffering from this plight and it would be unconscionable if the Mackenzie basin's pure waterways end up degraded as well – for the sake of one party's profit!

Tenure Review is intended to enhance natural landscape values and protect significant native vegetation. Habitats for threatened species should be protected and enhanced. Tenure Review should provide outcomes that are in the wider public interest. As far as I can see, this tenure review will greatly enhance the financial prospects of one property owner, while offering no safeguards for protection of ecosystems, landscape values and waterways.

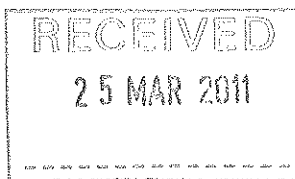
As the proposal does not substantially provide for landscape and ecological protection and recreational opportunities, tenure review should be halted and the property remains as a pastoral lease.

Yours sincerely

Liz Weir

125028

Commissioner of Crown Lands  
 C/ Darroch Ltd  
 PO Box 143  
 Christchurch  
 Email: tony.sharpe@darroch.co.nz  
**25.3.11**



622 Highgate  
 Maori Hill  
 Dunedin, 9010

## **Submission on the Preliminary Proposal for The Wolds Pastoral Lease**

The Wolds pastoral lease is situated in the Mackenzie basin and covers an area of approximately 8110 hectares. The Irishman Creek lease lies to the north, the Maryburn lease to the south, the Sawdon lease across the Tekapo River to the east and Lake Pukaki itself to the west. The Maryburn pastoral lease proposal is also out for public submission but as yet there is no proposal out for Irishman Creek, an important lease from the point of view of gaining satisfactory public access to The Wolds from the Tekapo canal road.

I note that the lease has three recommended areas for protection (RAPs) following the Protected Natural Areas Survey in the early 1980s:-

1. Tekapo RAP1 Reservoir Wolds Station –being 26ha west of the Mary range
2. Tekapo RAP8 Mount Mary eastside being 68ha of the MaryBurn wetland
3. Pukaki RAP13 Northeast face of Mount Mary being 160ha of scrub on the Mary Range

It would surely make more sense at the very least to have been able to consider a proposal for Irishman Creek along with The Wolds and Maryburn and ideally the three proposals should only be considered once the Mackenzie Consultative Group has reported back with their vision for the future of the Mackenzie Country landscape and how best to sustain ecological and other significant inherent values.

## **The Proposal**

### **1. CA1 An area of approx 600ha to be restored to full Crown ownership and control as a Conservation Area CA1**

I fully support the creation of this CA for the significant inherent values, landscape, vegetation and fauna values within it. They are well described in the proposal and in the Conservation Resources Report (CRR). I note that it is to be fenced off. I believe it should be extended to protect all of the special values, including habitats for threatened plants, lizards and birds as described in the CRR..

### **2. CA2 An area of approx. 70 ha to be restored to full Crown ownership and control as a Conservation Area CA2**

I fully support the creation of CA2. This area includes that identified as RAP 13 Pukaki under the PNAP programme and includes a variety of shrublands and rocklands, well described in the proposal and in the CRR. The significant inherent values, landscape, vegetation and fauna should certainly be protected within a fenced Conservation Area.

I do question the need for an access corridor for farming purposes right through the middle of the CA.

I cannot see any provision for public access to the CA as required by the CPLA Act, either from an easement through the through Irishman Creek lease or along the boundary adjoining the canal road and this is not a satisfactory outcome. The recreation values along the east face and ridge-top of the Mary Range seem not to be acknowledged in the proposal as it stands.

### **3. Scientific Reserve, R. An area of 85ha comprising a substantial wetland draining into the Mary Burn**

I fully support the protection of this area through designation as a Scientific Reserve, but believe it should be enlarged and fenced to protect from damage by cattle. The proposal sets out the significant inherent values, landscape, vegetation, fauna and wildlife within the proposed R area which fully justify the designation.

However, this 85ha is a part of the large Mary Burn wetland fed by springs and the Mary Burn itself.

The CRR states that

*'The southern part of the wetland was proposed as RAP 8 by Espie et al (1984) and the northern and central section was proposed as SONS 38 by Lee (1996). It was also identified as an SSWI by the NZ Wildlife Service and Department of Conservation. Partridge and Molloy (1986) concluded that the wetland was the largest and best moraine-dammed swamp in the Mackenzie Ecological Region and recommended that it be protected in its entirety, with cessation of artificial drainage, control of grazing and formulation of a management plan. This report supports that recommendation and backs the designations of RAP, SONS and SSWI status.'*

**I believe that the whole of the area described in the above extract from the CRR should be protected.**

**There also needs to be provision for public access to the Reserve to allow botanists and other lovers of natural history to appreciate the values within it.**

### **Land proposed for freeholding, 7,177 ha**

This area is largely significantly modified by pastoral activity, oversowing and topdressing. The Pukaki face on the west side of the Mary Range has a reasonably extensive cover of wilding trees and briar.

Landscape values are high and ideally the lakefront face should become a conservation area and the exotic species cleared and with a landscape covenant in place at the very least – one that would endure and not be dependant on the district plan which can be changed in the future.

Recreational access, non-motorised, should be secured at least along the crest of the range so that the extensive views could be enjoyed.

There should also be a landscape covenant in place over the Southeast face of the Mary Range. This area has relatively unmodified landscapes with remnant short tussock grasslands and shrublands that are highly visible from a major tourist route. A Reserves Act Landscape Covenant is needed to protect the landscapes associated with remaining indigenous vegetation, the uncluttered open landscape and extensive views.

**The Conservation Covenant proposed, CC1, 5 ha has significant inherent values well worthy of protection as detailed in the proposal.**

To fulfil the objects of the CPLA I believe it should rather be a CA, should cover all of the area previously identified as RAP Pukaki 13 and should be fenced off

**The significant inherent values are well described in the CRR -**

‘Of more importance though is a dry shrubland associated with massive rock outcrops, scree and boulderfield on the north-eastern face of the range previously identified as RAP Pukaki 13. On these dry rocky northeast-facing slopes, indigenous shrubs are dominant, including prostrate kowhai, matagouri, porcupine shrub, *Olearia odorata*, *Coprosma propinqua*, *C. virescens*, common broom, coral broom (very little) and *Muehlenbeckia complexa*. Other indigenous plants include golden speargrass, silver tussock, blue tussock, grasses, mat daisies, lichens, orchids and *Rubus schmidelioides*. In rock crevices are various indigenous ferns (*Cheilanthes humilis*, *Asplenium richardii*, *A. flabellifolium* and *Pellaea calidirupium*) and herbs (*Wahlenbergia albomarginata*, *Brachyglottis haastii* and white fuzzweed). The rare fern *Pleurosorus rutifolius*, recorded from the northern end of this system on the neighbouring lease, was searched for but not found. Weeds include mouse-ear hawkweed, sweet brier and occasional wilding pines. The botanical values of this dry shrubland are sufficient to support the original RAP and subsequent SONS identifications.’

There should be public foot access to this area so that the values can be appreciated by all.

To ensure secure public access and public enjoyment I ask that there be public access to Mt Mary from SH 8 as well as access along the track from the Pukaki Canal over the existing farm track that lies on The Wolds. It is a key recreation route and has panoramic views overlooking Lake Pukaki.

**Patersons Ponds**

The Patersons Ponds area should be designated a recreation reserve. It is an ideal place for picnics walking and fishing and a welcome spot to stop on a drive across the Mackenzie Country. Access is very clearcut and simple as it immediately adjoins the main highway where it crosses the Tekapo canal.

This submission is made following an inspection of the lease and I wish to thank Darroch Ltd and Mr John Murray for arranging it. I appreciated discussions with Mr Murray on site.

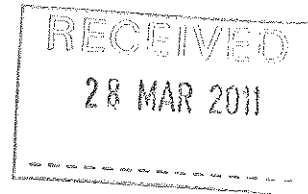
As someone who grew up in South Canterbury and frequently visited the Mackenzie Country both then and now I am very aware of the need to protect that unique landscape and the other significant inherent values within it.

Janet Ledingham

Chairperson, Dunedin Branch Forest and Bird

125029

Catherine Sintenie  
78 Silverton Rd,  
22RD Geraldine  
South Canterbury  
Email. [sintenie@farmside.co.nz](mailto:sintenie@farmside.co.nz)



Tony Sharpe  
Project Manager, Tenure Review  
Darroch Valuations.

28 March 2011

## **The Preliminary Proposal for The Wolds Crown Pastoral Land Tenure Review**

Here is my submission to the above proposal.

Broadly speaking, it is imperative that this proposal is not considered in isolation. The land use in area of the Mackenzie Basin has stirred significant public concern, both locally and nationally, and it is vital that this proposal is considered thoroughly. This must be done both in terms of its individual significance, particularly with regard to landscape and biodiversity values, as well as the cumulative effect when considering it alongside other similar proposals in the vicinity (whether they be under review now or in the future).

It must be considered in the context of its nationally significant surrounding landscapes, and collective value in terms of culture, biodiversity, regional economy (tourism) and recreation.

It should also be considered with regard to current Proposed National Policy Statements on Indigenous Biodiversity, and for Freshwater, and considered in the light of the regional approach of the Canterbury Water Management Strategy and its 'Principles that must be met' which were agreed to by all community stakeholders.

More specifically; this proposal fails to protect the extensive outwash plains, the Maryburn wetland catchment, the Tekapo River terraces and slopes of Mary Range, Patterson Ponds and the outwash terraces on the unoccupied Crown Land which have all been identified by expert botanists, entomologists, ecologists and Department of Conservation Staff as having significant values that warrant protection as public conservation land under the objects of the Crown Pastoral Lands Act, (CPLA).

The proposal also fails to provide secure public access to enable the public to enjoy the prominent Mackenzie Basin landmark, Mt Mary from SH8.

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

*1. All of the Maryburn Wetland catchment and Maryburn Stream – Extension to Proposed Scientific Reserve*

This area has outstanding values associated with wetlands, and streams, shrubby moraines and short tussock grasslands. It contains habitat for threatened species. To fulfil the objects of the CPLA this area needs to be protected as public conservation land as an extension to the proposed Scientific Reserve.

*2. Western slopes Mary Range overlooking Lake Pukaki – Public Conservation Land*

- This area contains outstanding landscapes, nationally rare wetland ecosystems and important dry land vegetation and shrublands, remnants of pre human vegetation. To fulfil the objects of the CPLA this area needs to be protected as public conservation land.
- To ensure secure public access and public enjoyment I ask that there be public access to Mt Mary from SH 8 as well as seek access along the track from the Pukaki Canal over the existing farm track that lies on The Wolds. It is a key recreation route and has panoramic views overlooking Lake Pukaki.
- Seek funding to support DOC in controlling the wilding pines that the lessee has abandoned. This is required to ensure ongoing sustainable management.

*3. Southeast Face Mary Range – Landscape Covenant*

This area has relatively unmodified landscapes with remnant short tussock grasslands and shrublands that are highly visible from a major tourist route. A Reserves Act Landscape Covenant is needed to protect the landscapes associated with remaining indigenous vegetation, the uncluttered open landscape and extensive views.

*4. Tekapo River Terraces – Extension to Proposed CA 1*

The proposed CA1 needs to be extended to protect all of the special value , including habitats for threatened plants, lizards and birds.

*5. Outwash Plain east of Mary Range and SH8 and NE Triangle Unoccupied Crown Land – Conservation Area*

These areas contain important landscape and conservation values associated with threatened environments, habitats and species and relatively natural open, highly visible landscapes adjoining a major road and tourist route.

Given these considerations I request that the Preliminary Proposal for the Wolds be withdrawn.

Yours sincerely

Catherine Sintenie



125030

**Tony Sharpe**

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**From:** Secretary [secretary@fmc.org.nz]  
**Sent:** Monday, 28 March 2011 9:00 p.m.  
**To:** Tony Sharpe  
**Subject:** Submissions on Maryburn & The Wolds  
**Attachments:** fmclogo.jpg; The Wolds Prelim Prop FMC.doc; Maryburn Prelim Prop FMC.doc

To Tony Sharpe  
Darroch Consulting  
ALEXANDRA

Attached here are the FMC submissions on the Preliminary Proposal for Tenure Review for Maryburn Station and The Wolds. Both are due on 31 March

Could you please acknowledge receipt of these.

Regards



*Phil Glasson*  
*Secretary*  
*Federated Mountain Clubs*



## Federated Mountain Clubs of NZ (Inc)

P O Box 1604  
WELLINGTON  
[www.fmc.org.nz](http://www.fmc.org.nz)

[secretary@fmc.org.nz](mailto:secretary@fmc.org.nz)

28 March 2011

Commissioner of Crown Lands  
c/- Tony Sharpe  
Darroch Limited  
41 Tarbert Street  
PO Box 27  
Alexandra 9320

Dear Tony

### **The Wolds – Submission on Preliminary Proposal**

Federated Mountain Clubs represents clubs involved back country recreation with a particular focus on mountainous areas.

We have looked the proposals for the Wolds and at the related documents on the conservation values and the Fish and Game Report. We are familiar with the site. We note the proposed areas set aside for conservation and support these.

We support the recommendations in the Fish and Game report with respect to access. However these do not cover a number of areas that we consider is necessary to protect and provide for recreational activity. The additional access that we seek (which fall under section 24(c) of the Act) are:

#### **1. The boulder field**

The preliminary proposal would have this area covered by a conservation covenant (CC1) and for an access easement along the rough vehicle track to be for the Minister of Conservation for management purposes (c-d).

In our view the area containing the boulder field should be retained in crown ownership its inherent values with secure public access being provided to the field. Access merely for the Minister of Conservation (and the Minister's agents) does not enable public use and enjoyment of the area.

#### **2. Mt Mary Ridge**

This hill offers good views of the Mackenzie Basin, the lake and the higher ranges to the west. It is a site worth a visit for many. A walk should be available along the crest of the ridge and include the access easement (e-f) to Mt Mary. The easement should also be for public foot access.

**3. Wetlands access**

We note that the access (a-b on the plan) to the area of wetland being reserved is to be a 'Minister of Conservation Management Access easement'. This should provide for public foot access as well. Provision is also needed to the end of the new fence at point T so that access can continue north along the ridge through the CA2 area. Without this access the CA2 conservation area will be landlocked.

**4. CA1**

We note that access from the hydro roads near the north end of the new fence (point z on the plan) appears to lack access through to this area. It is important that access can be gained from the north and provision needs to be made for this.

**Other Comment**

We have a major misgiving concerning the proposals which is not readily addressed under the Act's criteria for deciding tenure proposals. The lease, and the one neighbouring one, has an important scenic component that is not well addressed by the process and by the reports. The area involved is the foreground of some of New Zealand's key scenic vistas. The hydro canals, now also the route of Te Araroa, attract some tourist visits. The western end of this run includes the eastern slopes above Lake Pukaki and is part of the scenic vista from the lookouts off the main highway on the southern shore of Lake Pukaki, particularly the one near Dover Pass.

Others have interests in this aspect that are greater than ours. However, given the limitation of what can be done to protect this landscape aspect it would seem sensible to explore how the open space and scenic aspects could be protected before any freeholding of the land takes place. There is work being done on how better to protect and manage the landscape values of the Mackenzie Basin. .

We would therefore accept the deferral of decisions on this proposal until after the Forum has had time to look at the overall issue of landscape in the Mackenzie basin. The mechanisms available to ensure sensitive management of the landscape may well be limited if land ownership change occurs before this process is complete.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Phil Glasson', with a long horizontal flourish extending to the right.

Phil Glasson  
Secretary

125031

**Tony Sharpe**

---

**From:** Philip Grove [philip.grove@ecan.govt.nz]  
**Sent:** Wednesday, 30 March 2011 9:11 a.m.  
**To:** Tony Sharpe  
**Subject:** Re: submission on The Wolds tenure review preliminary proposal  
**Attachments:** Wolds submission.doc; The Wolds Map 1.jpg

Dear Tony

My submission on The Wolds tenure review preliminary proposal is attached. Please note that notwithstanding my email address, I have made this submission as a member of the public.

Thankyou for the opportunity to comment on this proposal and also the extension to the submission date.

regards

Philip Grove  
166 Mt Pleasant Road  
Mt Pleasant  
Christchurch

\*\*\*\*\*

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[www.ecan.govt.nz](http://www.ecan.govt.nz)

\*\*\*\*\*

166 Mt Pleasant Road  
Mt Pleasant  
Christchurch 8081

Commissioner of Crown Lands  
C/ Darroch Ltd  
PO Box 143  
Christchurch

29 March 2011

**RE: SUBMISSION ON THE WOLDS TENURE REVIEW PROPOSAL**

My name is Philip Grove. I am a professional ecologist with over 17 years experience working throughout the eastern South Island. I have a PhD in botany from the University of Otago.

The Wolds pastoral lease contains a range of significant inherent biological and landscape values (SIVs) that have been identified and described in the Conservation Resources Report (CRR) attached to this proposal, as well as numerous other published reports (e.g. Espie et al 1984). New information from more recent Department of Conservation-led surveys has identified SIVs additional to those listed in the CRR (DOC 2007).

The SIVs on The Wolds represent some of the best remaining examples and ecologically-intact sequences of rare (either naturally or as a result of human activities) and threatened indigenous ecosystems, habitats and species characteristic of the Mackenzie Basin. Few if any opportunities remain to protect similar ecological values outside the Mackenzie Basin. The SIVs of The Wolds are therefore of national importance for the conservation of indigenous biodiversity. These SIV's should be protected (preferably as public conservation land) to meet the objectives of the Crown Pastoral Lands Act (CPLA s. 24).

Protection for areas CA1, CA2, CC1 and R (Scientific) is supported. However, collectively these include only about 10% of the SIVs identified, and therefore do not come close to adequately protecting the full range of SIVs present on The Wolds pastoral lease. It is of great concern that some of the most important SIVs on The Wolds, including nationally-significant wetland habitats, are proposed for freehold. It is then likely that most of these values will be rapidly lost due to agricultural or other development, or more gradually reduced through continued grazing and spread of introduced plants.

The Preliminary Proposal does not appear to recognise the importance of the SIVs identified in the CRR and fails to take account of new information from more recent surveys that describe the full extent of SIVs present here. It also fails to apply

conservation threat assessment and prioritisation tools such as the Threatened Environments Classification (Walker et al 2007), and therefore does not take the opportunity to secure protection of the full range of rare/threatened species (de Lange et al 2009) and ecosystems (Williams et al 2007) on The Wolds.

For these reasons The Wolds preliminary proposal is inconsistent with the CPLA (s.24) as well as other government strategies and priorities for the protection of New Zealand's indigenous biodiversity (MfE & DOC, 2000; MfE 2007). It is my submission that The Wolds be withdrawn from tenure review and the proposal reconsidered.

#### **Decision sought**

That, in addition to CA1, CA2, CC1 and R (Scientific) the following areas be protected as public conservation land for their significant inherent biological and landscape values (The Wolds Map 1):

- Lake Pukaki lateral moraine complex.
- The Wolds Moraine and Outwash Plain.
- The whole of the Maryburn/Wolds wetland, including its catchment and hydrological connections to adjacent streams, moraines and outwash plain.

#### **References**

de Lange, P.J.; Norton, D.A.; Courtney, S.P.; Heenan, P.B.; Barkla, J.W.; Cameron, E.K.; Hitchmough, R.; Townsend, A.J. 2009. Threatened and uncommon plants of New Zealand (2008 revision). *New Zealand Journal of Botany* 47: 61-96.

Department of Conservation 2007. Botanical Survey Pukaki Lateral Moraine – Maryburn Station. DOC internal report ref DOCDM-228871. Canterbury Conservancy.

Espie, P.R.; Hunt, J.E.; Butts, C.A.; Cooper, P.J.; Harrington W.M.A. 1984. *Mackenzie Ecological Region. Survey report for the New Zealand Protected Natural Areas Programme*. Department of Lands and Survey, Wellington.

Ministry for the Environment and Department of Conservation 2000. *The New Zealand Biodiversity Strategy*. Department of Conservation, Wellington.

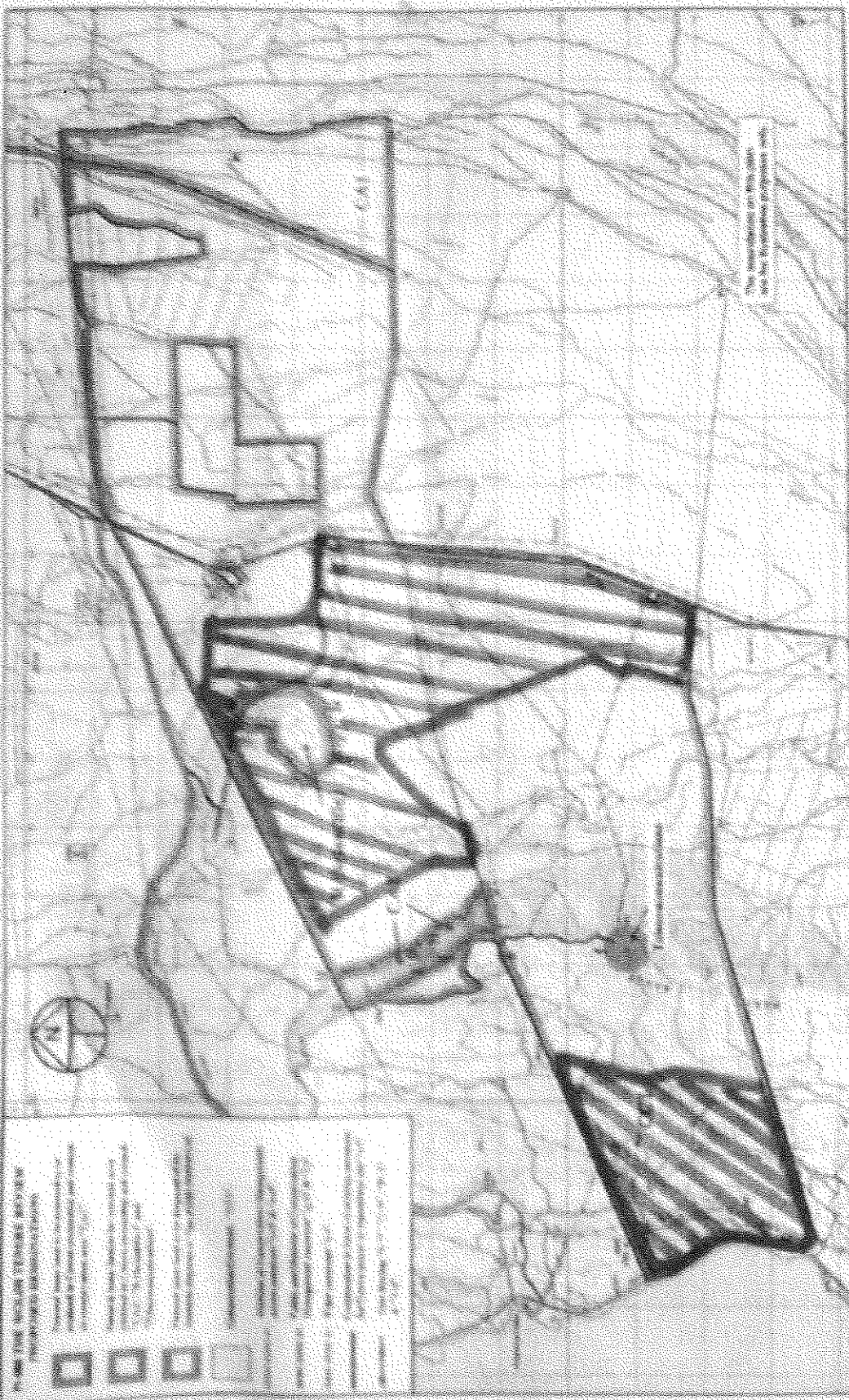
Ministry for the Environment 2007. Protecting our Places. Introducing the national priorities for protecting rare and threatened native biodiversity on private land. Ministry for the Environment, Wellington.

Walker, S.; Cieraad, E.; Grove, P.; Lloyd, K.; Myers, S.; Park, T.; Porteous, T. 2007. Guide for users of the Threatened Environment Classification (Version 1.1, August 2007). Landcare Research.

Williams, P.A.; Wiser, S.; Clarkson, B.; Stanley, M.C.; New Zealand's historically rare terrestrial ecosystems set in a physical and physiognomic framework. *New Zealand Journal of Ecology*, 31(2): 119-12.

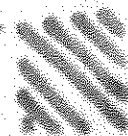
# MAP 1 THE WOLDS PASTORAL LEASE

RELEASED UNDER THE OFFICIAL INFORMATION ACT



## The Wolds

### Preliminary Proposal



Additional areas to be protected for biodiversity, landscape & amenity sites

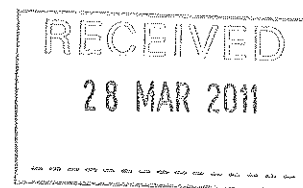
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Kilometers					
Chatterbury Land District					
Not to scale					



125032

118 Rutherford Street,  
Nelson 7010,  
Email: andydennis@xtra.co.nz  
28<sup>th</sup> March 2011.



Commissioner of Crown Lands,  
c/- Darroch Ltd.,  
PO Box 143,  
CHRISTCHURCH.  
(Attention Tony Sharpe.)

**SUBMISSION ON THE PRELIMINARY PROPOSAL FOR TENURE REVIEW OF THE WOLDS PASTORAL LEASE.**

I am making this submission as a person with a long association with the Mackenzie Basin and extensive background in tenure review. As regards the former I spent several seasons based at Mount Cook in the 1980s, among other things writing "The Alpine World of Mount Cook National Park (1984) as well as the most recent handbook for the park ("The Story of Mount Cook National Park", 1986). In the context of tenure review I surveyed almost 20 leases between the Wairau Valley and McKenzie Basin between 1993 and 2003 during my time as a member of the national executive of Federated Mountain Clubs (including Braemar, Balmoral and Quailburn leases in the Mackenzie Basin). I have continued to be closely involved in South Island high country issues over recent years and since 2006 have represented conservation and recreation interests on the Molesworth Steering Committee.

**Preliminary Proposal Must Be Withdrawn**

I have had the opportunity to read a draft of the submission being prepared by the Head Office of the Royal Forest and Bird Protection Society and **strongly support their submission that this Preliminary Proposal (PP) for The Wolds be withdrawn and renegotiated** as it fails to adequately protect a number of areas which have been identified by expert botanists, entomologists, ecologists and the Department of conservation (DOC) as having significant inherent values within the meaning of sections 2 and 24(b) of the Crown Pastoral Land Act 1998 - and hence fails to meet the primary objective set out in section 24(a) of that Act to "promote the management of reviewable land in a way that is ecologically sustainable". It is made clear in section 25(2)(a) that this primary objective applies to "**all the land**" included within the current lease.

Prominent aspects of the preliminary proposal that support the above contention include:

- The proposed freeholding of more than 90% of the lease (i.e. 7,176 ha. out of a total lease area of 7,934 ha.) suggests that *prima facie* the objectives in s.24 have been seriously disregarded in the present preliminary proposals for The Wolds. In this regard it seems to me that in negotiating these Preliminary Proposals current government policy appears to have been given precedence over the clear aim and intent of the governing legislation.
- No scientific or other evidence has been provided in the preliminary proposals to show how freeholding 90% (7,176 ha.) of The Wolds pastoral lease will “promote the management of reviewable land in a way that is ecologically sustainable”.
- In the recent (November 2010) Mackenzie Forum (attended by 220 people) a number of scientists with extensive backgrounds in high country ecology (including Dr Les Molloy and Susan Walker of Landcare Research) pointed out that while currently only 6% of lower altitude grasslands, wetlands and braided rivers are protected in the Mackenzie Basin a minimum of 30% of these low-basin ecosystems need to be protected to ensure the long term survival of these specialist dryland ecosystems.
- The omission of the most recent (2008) report from the Department of Conservation on The Wolds from the LINZ website means that submitters have not been given access to a significant update on the Department’s earlier (2004) Conservation Resources Report.

Factors like these would seem to seriously undermine the integrity of these Preliminary Proposals and, unless withdrawn, are highly likely to lead to judicial review. As Minister for the Environment Nick Smith noted during the November 2010 Mackenzie Forum, “unless some new way forward is found to manage economic and environmental matters in the Mackenzie there would be a decade of litigation that would only benefit lawyers” (quoted from “Forest & Bird”, February 2011, p.11).

### **Additional Protection Needed**

The submission of the Head office of the Royal Forest and Bird Protection lists in detail the extent of additional protection that is needed to provide adequate protection for areas of significant inherent values on The Wolds and hence fulfil the objectives set out in section 24 of the CPLA. These areas, which for the most part should be protected as public conservation land in accordance with section 24(b)(ii) of the CPL Act, include:

- The whole of the 765 ha. of the Maryburn wetland and catchment along with Maryburn Stream and its bordering shrublands should be protected as public conservation land.
- The western slopes of the Mary Range overlooking Lake Pukaki should be protected as public conservation land for both their landscape and ecological values.
- All the areas of Tekapo River terraces identified by DOC as having significant inherent values should be protected as public conservation land (i.e. as additions to the current CA1 area).
- The areas of the outwash plain east of the Mary Range and SH8 as identified in the Forest & Bird submission should be protected as public conservation land.

- The southeast face of the Mary Range which constitutes a major feature along SH8 between lakes Tekapo and Pukaki, should be protected from inappropriate future development by a landscape covenant.

### **Public access**

In addition to protection of the above areas for their ecological and landscape values, public access must be secured to the crest of the Mary Range for walkers and mountain bikers from both SH8 and the road along the Tekapo-Pukaki hydro canal. Tenure review provides what is likely to be the last opportunity for the Crown to secure public access for the foreseeable future across tracts of wild and semi-wild terrain over which access has, in recent years, often become much more difficult than it has been in earlier times. In resolving this matter current patterns of access are not necessarily a good indicator of where such access might be reasonably expected to be required in the foreseeable future. In this regard the crest of the Mary Range provides easily the best elevated views of Lake Pukaki and the high peaks and glaciers of Mount Cook National Park along SH8. It is thus critical for "the securing of public access to and enjoyment of reviewable land" under section 24(c)(i) of the CPLA that legal foot and mountain-bike access to this prominent high-point in the central part of the basin is included in tenure review of The Wolds pastoral lease.

### **Concluding Statement**

As outlined above, this preliminary proposal fails in far too many ways to meet the objectives stated in section 24(a) of the CPLA and must be withdrawn, renegotiated to ensure adequate protection for all areas of significant inherent values, and re-notified for public submission. Moreover, because (i) basin floor ecosystems in the Mackenzie Basin have hitherto been very inadequately protected; and (ii) there are currently a number of other basin floor leases involved in tenure review (Balmoral, Irishman Creek, Maryburn and Simon's Pass) such re-negotiation should be informed by the outcomes of the collaborative planning process the government has recently initiated for the Mackenzie Basin. Among much else, it is critical that a comprehensive plan is formulated for the whole of the Mackenzie Basin to address the currently out of control wilding conifer infestation, which at the southern and north-eastern ends of Lake Pukaki is very much worse than anywhere else in the Canterbury high country and constitutes a major ongoing threat to very significant landscape and ecological values.

I would like to be keep informed of the progress with this review and to be informed of any further opportunities that may arise for public submission.

Yours sincerely,

Andrew Dennis.

125 033

## KELVIN REID

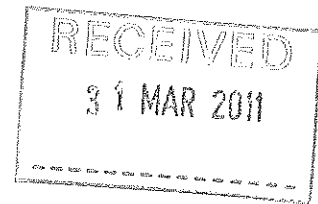
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Phone: +64 (0)3 351 4025  
Cell: +64 (0)21 997 343  
Email: kgr@kelvinreid.co.nz

31 March 2011

Mr Tony Sharpe  
Darroch Limited  
PO Box 27  
Alexandra 9320



### The Wolds Station – Submission on Preliminary Proposal

1. I act for the Pukaki Irrigation Company Limited ("PIC") and make the following submission on its behalf.
2. Subject to the issues raised below, PIC strongly supports the preliminary proposal for the tenure review of The Wolds Station. The proposal is entirely in accordance with the Objects of Part 2 of the Crown Pastoral Land Act 1998. It achieves the promotion of the management of The Wolds in an ecologically sustainable way. It will also enable the land freeholded to the owners of The Wolds to be freed from the management constraints inherent in its tenure as a pastoral lease so as to enable its better economic use.
3. PIC was formed in 2006 as a vehicle to obtain the necessary authorisations and to construct the infrastructure required to deliver water from the Tekapo A-B canal for irrigation of approximately 5234 hectares of Simon Hill Station, Simons Pass Station, Maryburn Station, and Glentanner Station at Catherine Fields. PIC is owned by the principals of Simons Pass and Simons Hill Stations.
4. This irrigation proposal is currently the subject of applications for resource consent to take and use water for irrigation. These are being considered by the Canterbury Regional Council. The applications are long standing and hearings were held in relation to them and in 2009/2010. The hearing currently stands adjourned and a decision is anticipated in the near future.

5. The PIC irrigation proposal involves bringing water via a buried pipeline across the Maryburn, Irishman Creek and The Wolds pastoral leases. In order to provide a corridor across each pastoral lease for the pipeline and water PIC applied, in May 2009, to the Commissioner of Crown Lands for an easement under 60(1) of the Land Act 1948. The application was accompanied by engineering drawings and maps identifying the proposed route in outline, and the details of the construction and installation of the pipeline.
6. The Commissioner placed the application under section 60 (1) on hold in September 2009 on the basis that he was not prepared to decide the application until the take and use water permit applications had been determined. PIC did not and does not agree that it was appropriate to place the application on hold.
7. PIC's position is that the commissioner has a legal obligation to conclude the process for the section 60 easement application before disposing of any land, via tenure review or otherwise, in a matter that would frustrate PIC's legitimate expectation to have the application determined while the property remains in Crown ownership and control. The Commissioner has given PIC undertakings to the effect that;
  - 7.1. The tenure review files for The Wolds, Maryburn, and Irishman's Creek have been noted to the effect that prior to the finalisation of the tenure review for these properties the easement application must be determined; and
  - 7.2. The tenure review process would not prejudice the consideration of the easement application.

The Preliminary Proposal made to The Wolds and notified on 10 December 2010 makes no mention of the PIC easement application. PIC therefore submits that the tenure review for The Wolds should not be finalised and that settlement of any Final Proposal not occur until the easement has been created.

Yours Faithfully

**Kelvin Reid**

125034

Submission to the Tenure review process for The Wolds pastoral lease.

Submitter: Robert Seeley

31/3/2011  
rcvd

Tony Sharpe  
Commissioner of Crown Lands  
Darroch Ltd  
PO Box 143  
Christchurch

Address:  
37 Clyde St,  
Roseneath,  
Dunedin

Dear Mr. Sharpe

The Mackenzie Basin of which The Wolds lease is a central part has until recently remained in a semi-natural state and as such able to support native animals and plants and provide the unique landscapes my family and myself have always loved.

These significant inherent values of The Wolds - and the remaining crown land- are clearly in jeopardy should the freeholding take place. There are numerous examples to the South where intense irrigation has resulted from such privatization- bright green fields and boom irrigators play no part in this landscape.

I understand a forum for the future of the basin is established to provide a comprehensive plan for the whole area. This is exactly what is required and its recommendations should be available to inform all privatization proposals for the Mackenzie. The piecemeal privatization of tenancies like The Wolds subverts this aim.

My submission is to delay the above procedures until the outcome of the forum for the Mackenzie basin is known.

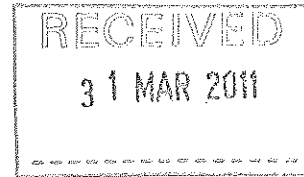
Yours sincerely

Robert Seeley

125035

**Submission on The Wolds Preliminary Proposal**

From Annette Hamblett  
11 Hewitts Road  
Merivale  
Christchurch 8014  
[ahamblett@xtra.co.nz](mailto:ahamblett@xtra.co.nz)



I am submitting to seek complete withdrawal of the preliminary proposal on The Wolds pastoral lease on the grounds that it does not protect extensive areas with significant inherent values as is required under the Crown Pastoral Land Act 1998.

The reviewable area encompasses naturally rare ecosystems and species. These are national priorities in the NZ Biodiversity Strategy and in the Government's priorities for the protection of biodiversity on private land (Ministry for the Environment, 2002; 2007). The areas proposed for protection come nowhere near adequately protecting significant inherent values on The Wolds lease. Some are too small to be ecologically sustainable. Where these values are on land proposed for freeholding, it is inevitable that they will be lost over time through agricultural activities such as development, irrigation and over-grazing, and increased weed invasion is highly likely. The area also includes landscapes that are important for New Zealand's tourism industry and businesses that incorporate this landscape in marketing of their products.

The proposal does not serve the best interests of New Zealand; it would give substantial private gain to the lessee at the expense of the New Zealand public, in terms of lost ecosystems (and valuable ecosystem services), species, landscapes and recreational opportunities.

Any future tenure review proposal should be negotiated to protect the significant inherent values identified by experts, including Dept of Conservation staff, and be re-notified to allow for public submissions.

**1. Lake Pukaki lateral moraine complex** – western slopes of Mary Range between Lake Pukaki and the western slopes of the Mary Range to its crest.

I oppose the freeholding of the hummocky moraine between Lake Pukaki and the Mary Range and the western slopes of the Mary Range.

This area has significant inherent values. It is a part of the most intact lateral moraine complex still remaining in the Mackenzie Basin. Values include an outstanding glacial landscape and lakeside setting; the Mary Range - "one of the few landforms that protrude above the surface of the outwash plains and terraces, making it a significant natural feature within the wider context of the basin"<sup>1</sup>; its part in the scenic backdrop to Lake Pukaki with visibility from State Highway 8 to Aoraki/Mt Cook; it has nationally rare ephemeral and kettlehole wetland ecosystems and dryland vegetation and shrubland remnants of pre-human vegetation; there are two notable beetle species. There are several threatened plants species including 'nationally endangered', 'nationally vulnerable' and 'declining' species. The area has potential

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<sup>1</sup> Conservation Resources Report

recreation values for walking, mountain biking and rock climbing. There is easy access from State Highway 8 and panoramic views from Mt Mary. The lessee has failed to control wilding pines, as required under the lease, such that they have become a significant weed issue requiring substantial control. This does not bode well for future land being freeholded to the lessee.

**Decision sought:**

- Protection under full Crown ownership and control as a public conservation area to protect its significant inherent landscape, species and ecosystem values.
- In any renegotiated proposal, the Department of Conservation be given adequate funding to control the wilding pines.

**3. Public access easement to Mt Mary**

Should Mt Mary not be protected as public conservation land, as should happen and is sought above, to secure public access to and enjoyment of the reviewable land, a public access easement needs to be provided.

**Decision sought:**

Public access provided from State Highway 8 through the public conservation land to Mt Mary, along with public access along the track from the Pukaki Canal over the existing farm track that lies on The Wolds, if the whole of the crest of the range is not protected.

**4. South-east face of Mary Range**

This area has significant inherent landscape values, providing relatively unmodified landscapes with fescue tussock grasslands and shrublands visible from a major tourist highway. A landscape covenant is needed to protect these values that are important to tourist experience and the tourism industry.

**Decision sought:**

Protection of the southeast face of the Mary Range through a landscape covenant under the Reserves Act, to protect the significant inherent values in the landscape.

**5. Maryburn Wetland and Maryburn Stream**

This area has a number of significant inherent values, namely: it is the largest and best moraine-dammed wetland system in the Mackenzie ecological region and is one of the few remaining relic swamps in the basin; the small spring-fed streams support a threatened native fish "bignose galaxias and the uncommon freshwater mussel; nine threatened bird species use the wetland, including black stilt, black-fronted tern, banded dotterel and three threatened plant species". There are a wide variety of habitats for invertebrates.

These values have led to recommendations for its protection since 1984, and its ranking as a Site of Special Wildlife Significance and a Site of Natural Significance.



Wetlands are recognised as one of New Zealand's most threatened ecosystems. Such an important high-country wetland easily warrants protection in its entirety to ensure its long-term viability.

Adjacent glacial features here need protection. They are fast diminishing in the basin. For example, the peri-glacial outwash is a unique feature that could be lost for all time.

**Decision sought:**

Extension of the proposed scientific reserve to cover the full 765 ha recommended for protection by the Department of Conservation to ensure protection of the significant inherent values in the wetland and stream, and glacial features.

**6. Tekapo River Terraces**

This area has significant inherent, ecosystem, species and landscape values. There are relatively undeveloped ecosystems on recent outwash terraces, representative of those originally present; there is habitat for five threatened plant species, including a threatened broom and a convolvulus; habitat for four threatened lizard species and three threatened bird species; there are distinctive, scenic Mackenzie Basin landscape values visible from the canal road.

**Decision sought:**

Extension of the proposed Conservation Area (CA1) to protect the full 888 ha identified by the Department of Conservation, encompassing the significant inherent values noted above.

**8. Patersons Ponds**

These man-made ponds have significant inherent values as they provide habitat for threatened bird species including black-billed gull and black-fronted tern, and are also popular for recreation on the water, picnicking and bird watching. The ponds are a part of the Tekapo riverbed identified as a Site of Natural Significance in the Mackenzie District Plan.

**Decision sought:**

Protection of these ponds as a conservation area to protect their significant habitat values and recreation values.

**9. Northeast Triangle – Unoccupied Crown Land**

The block of Unoccupied Crown Land north of the Tekapo Canal and adjacent to The Wolds lease, has significant inherent values. These include good-quality short-tussock grasslands now rare in the Mackenzie Basin, two ephemeral tarns providing invertebrate habitat, good habitat for the nationally endangered robust grasshopper, and a moa-bone site.

**Decision sought:**

Protection of the significant inherent values in this triangle as public conservation land.

**10. Outwash plain east of Mary Range and State Highway 8**

There are significant inherent landscape and habitat values in this area. They include remnant indigenous vegetation on a threatened environment, wide views of the glacial processes of the Mackenzie Basin, an outstanding scenic view for tourists provided by its naturalness, sense of space, and high visibility from State Highway 8.

Freeholding this area would put these values at risk from agricultural developments and further wilding conifer spread.

**Decision sought:**

Protection of this area as public conservation land to protect its landscape and natural values.

**11. Artificial pond at intersection of State Highway 8 and Tekapo Canal**

This pond, and associated swamp, includes threatened plants such as *Coprosma intertexta* and *Olearia bullata* and needs to be managed in an ecologically sustainable way. As so many wetlands have been lost in New Zealand, appropriate management of this wetland is needed.

**Decision sought:**

Establish a Sustainable Management Covenant over the pond and the associated swamp to promote the management of the reviewable land in a way that is ecologically sustainable.

125036

**Tony Sharpe**

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**From:** SEA Otago [seaotago@gmail.com]  
**Sent:** Thursday, 31 March 2011 3:46 p.m.  
**To:** Tony Sharpe  
**Subject:** Submission on preliminary proposals for tenure review of Maryburn and The Wolds  
**Attachments:** Maryburn Submission.pdf; Wolds Station Submission.pdf

Please see attached.

Sincerely,  
Students for Environmental Action (SEA) Otago

31 March 2011

Darroch Ltd  
PO Box 143  
Christchurch  
Attn: Tony Sharpe  
[Tony.sharpe@darroch.co.nz](mailto:Tony.sharpe@darroch.co.nz)

## **SUBMISSION ON PRELIMINARY PROPOSAL FOR TENURE REVIEW TO THE WOLDS STATION**

SEA Otago  
University of Otago Clubs and Societies Building  
84 Albany Street  
Dunedin 9015

### **Introduction**

Students for Environmental Action (SEA) Otago is a student environmental group that supports environmental protection locally and nationally. SEA has approximately 20 active members and 514 members on the mailing list.

### **Decision Sought**

SEA submits that the Proposal be withdrawn as it is contrary to the Crown Pastoral Lands Act 1998 (CPLA) including the Objects in Part 2 as it fails to protect the Moraines between Lake Pukaki and the Mary Range, the south east face of the Mary Range, the Maryburn wetland catchment, the Tekapo River terraces and slopes of Mary Range, Paterson Ponds and the outwash terraces on the unoccupied Crown Land which have all been identified as having significant values that warrant protection as public conservation land under the objects of the Crown Pastoral Land Act 1998 (CPLA).

The proposal also fails to provide secure public access to enable the public to enjoy the prominent Mackenzie Basin landmark, Mt Mary from SH8.

### **Detailed Submissions**

#### **Western slopes Mary Range overlooking Lake Pukaki – Public Conservation Land**

This area is an outstanding glacial landscapes, and includes nationally rare wetland ecosystems and important dry land vegetation and shrub-lands, remnants of pre human vegetation. To meet the Objects of the CPLA this area needs to be protected as public conservation land.

Public access to Mt Mary from SH 8 as well as access along the track from the Pukaki Canal over the existing farm track on The Wolds is required to meet the Objects of the CPLA. This is an important recreation route with panoramic views over Lake Pukaki.

**Southeast Face Mary Range – Landscape Covenant**

A Reserves Act Landscape Covenant is needed to protect the outstanding relatively unmodified open landscape associated with remaining indigenous vegetation, particularly remnant short tussock grasslands and shrublands. It is highly visible from a major tourist route.

**Maryburn Wetland and Maryburn Stream – Extension to Proposed Scientific Reserve**

This area has outstanding Significant Inherent Values (SIVs) being the largest and best moraine – dammed wetland system in the Mackenzie ecological region. It contains habitat for threatened species. The objects of the CPLA require that this area need be protected as public conservation land as an extension to the proposed Scientific Reserve.

**Tekapo River Terraces – Extension to Proposed CA 1**

The proposed CA1 needs to be extended to protect all of the identified SIVs, including habitats for threatened birds, lizards and plants.

**Outwash Plain east of Mary Range and SH8 and NE Triangle Unoccupied Crown Land – Conservation Area**

These areas contain important identified SIVs associated with highly visible relatively natural, open landscapes, indigenous habitats and species on threatened environments.

Yours sincerely,

**Students for Environmental Action (SEA) Otago**

125034

**Tony Sharpe**

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**From:** descrip@paradise.net.nz  
**Sent:** Thursday, 31 March 2011 4:12 p.m.  
**To:** Tony Sharpe  
**Subject:** Land Tenure Reviews - Maryburn and Wolds  
**Attachments:** Maryburn submission.pdf; Wolds submission.pdf

Tony,

I attach submissions to the land tenure review proposals for Maryburn and Wolds.

Regards,  
Philippa Crisp  
President  
New Zealand Plant Conservation Network



**New Zealand Plant Conservation Network submission to the Wolds Tenure Review Proposal**

The Network is the largest NGO in New Zealand devoted solely to the protection of our native flora. New Zealand has a rich, diverse and unique plant life, but sadly the number of critically threatened plant species has increased by 60% over the last five years.

The MacKenzie Basin is a unique and highly distinct ecosystem made up of a diverse array of ecological assemblages that constitute an important part of New Zealand's natural heritage. It is critical that the threatened species that are part of the MacKenzie basin be given space and habitat to survive and thrive.

Eleven threatened and "at risk" plant species have been recorded on the lateral moraines that are found within the Wolds. These moraines contain rare ecosystems on which distinctive plant communities grow. The small areas put aside as conservation areas in the proposed tenure review map will not provide adequate protection to these plants. **The Network seeks the decision that the lateral moraines be protected as part of a dryland reserve or under a conservation covenant that ensures that the land is managed in a way that provides for the survival of these plants.**

Philippa Crisp  
President  
New Zealand Plant Conservation Network.

Ph: 049347143 or 0274986191  
Email: [descrip@paradise.net.nz](mailto:descrip@paradise.net.nz)