

Crown Pastoral Land Tenure Review

Lease name : *The Wolds*

Lease number : PT 008

Public Submissions Part 4

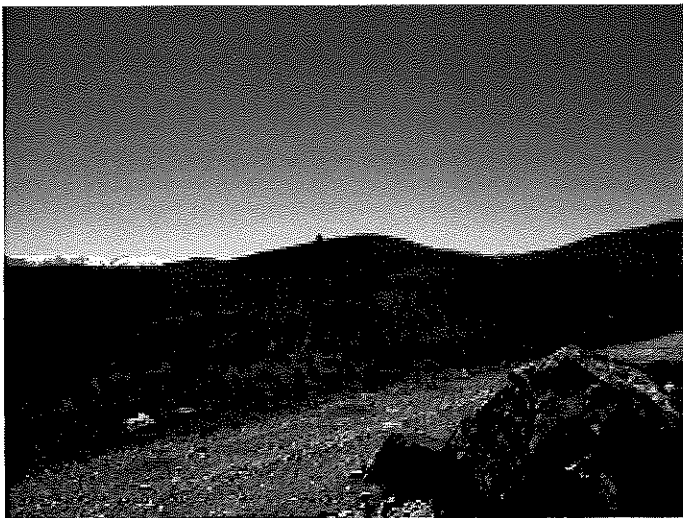
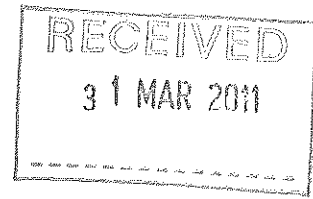
These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

These submissions are released under the Official Information Act 1982.

August

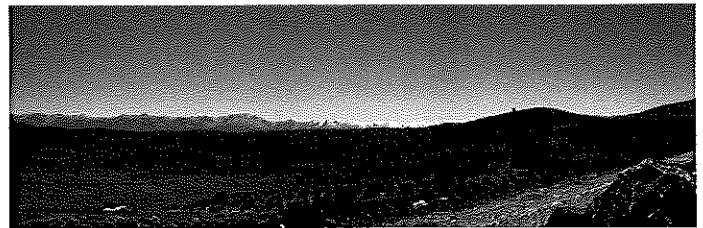
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The Wolds

Mackenzie Guardians



Mackenzie Guardians Incorporated
213 Olliviers Rd
Linwood
Christchurch

30 March 2011

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

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

Background

Mackenzie Guardians Inc. is a group, which was formed to present the views of its members concerned about the rapid rate of indigenous ecosystem loss and landscape transformation in the Mackenzie Basin.

The aims of Mackenzie Guardians are to promote the protection of the natural/naturalistic wildlife, water, vegetation, heritage and landscape values of the Mackenzie Country. Mackenzie Guardians believe that the values of this unique area need to be conserved for the enjoyment and well-being of present and future generations.

The Mackenzie Guardians have undertaken considerable assessment and analysis in the Mackenzie Basin and have identified that, together with adjoining Maryburn, The Wolds Pastoral Lease lands encapsulate the very essence of the basin's natural and naturalistic values. The Lease includes core aspects of the iconic Mackenzie Country. The Mackenzie Guardians have previously met with the CCL and LINZ officials for clarification that the statutory processes will be adequately implemented in any tenure review and consent processes to address the character and scale of these Mackenzie landscapes. It is thus extremely alarming to receive tenure review proposals that do not implement either the statute or the stated intent of this government (Crown pastoral land - 2009 and beyond). The government's policy provides an assurance that inherent landscape values will be maintained and protected. The Wolds' proposal does not achieve this.

Mackenzie Guardians understands the Tenure Review proposal for The Wolds Pastoral 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).

Mackenzie Guardians oppose the preliminary Tenure Review proposal in its entirety because the proposal does not adequately recognise and provide protection for large areas of land with significant inherent values (SIVs). The proposal does not meet the provisions of the Crown Pastoral Lands Act (CPLA). It does not maintain or protect the fundamental significant and natural values of the heart of the Mackenzie Basin that is contributed to very substantially by lands of The Wolds.

Under the CPLA Section 24 (b) (i) and (ii), significant inherent values (SIVs) must be protected by the application of protective mechanisms with a preference to return to full Crown ownership and control.

The proposal does not promote the management of reviewable land with significant inherent values in a way that is ecologically sustainable, as required by the CPLA Section 24 (a) (i).

The proposal does not provide for future public access, recreational opportunities and enjoyment of the high country landscape as required by Section 24 (c) (1) of the CPLA *"make easier the securing of public access to and the enjoyment of reviewable land"*.

The proposal does not implement government policy (2009 and beyond) directive for protecting and maintaining high landscape values, including of lakesides, through varying methods. The proposal does not achieve this. As reiterated by the Guardians in meeting with LINZ officials, administration should more closely match statutory requirements and government directions. The methods proposed in this tenure review do not ensure achievement of the stewardship that is directed by the government policy, particularly for the natural character of landscapes, including lakeside landscapes.

The Wolds Pastoral Lease

The Wolds is located 19 km south of Tekapo on State Highway 8 in the centre of the Mackenzie Basin. The property runs from the Tekapo River across outwash terraces and braided floodplain terraces (Land Type H4, Basin Floor Outwash Plains). The Mary Range, of glacially over-ridden bedrock, a roche moutonnee (Land Type H15, Isolated

Mountain) protrudes through impressive moraine fields, along with their backswamps and fluvial terraces, that extend from the highway to Lake Pukaki (Land Type H3, Glacial & Fluvial Basin Floor) (refer land type mapping, models and diagrams attached). Within the glacial moraine, landform components featured include wetlands, moraine deposits, boulder fields and kettle holes along with their associated vegetation. The 3 major land types, the outwash, the moraine and the isolated mountain, and the associated lake, form the essence of the central Mackenzie Basin landscape.

The Wolds is an integral part of the Mackenzie Basin. The property has outstanding landscape values because of its overall natural appearance. The Ben Ohau Range, Southern Alps and Aoraki provide a majestic backdrop to the west and The Grampians to the east. The Mary Range is a prominent natural landmark in the area and is of high scenic value.

The Wolds involves a quintessential transect through the central basin. The natural values are highly legible and highly valued. The naturalness and continuity, of the landscape sequence is fundamental to the Mackenzie Basin landscape value. The proposal fails to protect the naturalness and the continuity of this sequence.

A large part of The Wolds is visible from State Highway 8, a national tourist highway and the Tekapo Canal Road, which are important corridors through the Mackenzie Basin. The Te Araroa trail passes through the area from Tekapo to Twizel, mainly within the Lake Pukaki moraine landscape and along the Pukaki shoreline for 7kms to SH8. The central Mackenzie Basin landscape is highly significant to the visitor/tourist and local community experience, and contributes to their sense of place, identity and well-being.

The close up views from SH8 are important to New Zealanders and international visitors travelling through the Mackenzie Basin. The views of the natural complex are iconic and deserve protection.

The Wolds has highly significant landscape and ecological values. The area makes a highly important contribution to intact ecological sequences of low altitude naturally rare ecosystems. Inland outwash gravels and braided riverbeds, frost hollows and inland sand dunes are originally rare ecosystems.

Key areas east of SH8 not adequately protected are:

The Tekapo River terraces and eastern outwash plains

Mackenzie Guardians support the proposed conservation land status for the eastern alluvial terraces adjacent to the Tekapo River (CA1), however the proposed boundary and new fence (y to z) would result in undesirable visual outcomes. A boundary that is more inclusive of the whole landform surface and one which maintains the existing uniformity, continuity and openness of the landscape and associated ecosystem, is recommended. For, These alluvial terraces provide the continuity and linkage with other geomorphic features, such as the outwash plains, that make the Mackenzie Basin so distinctive, and help provide the District with an impression of spaciousness. (*The Wolds CRR 2004 pg 6*).

Inclusion of the terrace and a part of the higher rolling moraine surface under fescue tussock grassland would protect an intact sequence of habitats including terrace crest, scarp, footslope, outwash and recent alluvial terrace through to gravel riverbed. Rather than protecting one or two habitat sequences – patches, as currently proposed - there would be much greater value in protecting the sequence to allow for natural ecological processes to continue to operate and for species to migrate in response to climate

change. The larger the area the more resilient it will be and the higher its ecological value.

These areas have low to very low pastoral value. Extensive modification would be required to support productive pastoral use or would be potentially forested. Either option would have significant adverse effects with respect to fragmentation of intact landforms, ecosystems and landscape integrity and would very likely result in loss of rare and threatened species.

To best retain the impressive open and large-scale naturalistic landscape of the central Mackenzie Basin, the existing intact sequence of landforms and vegetation cover between the area of border dyked paddocks and the Tekapo River should be protected in perpetuity.

Triangular section of Unoccupied Crown land adjoining the northeast corner of the lease.

A 451 ha triangular shaped block of outwash terrace on unoccupied Crown land adjacent to the Wolds lease should be protected. It includes two ephemeral tarns, modified fescue tussock grassland with scattered matagouri and stonefield. It has good quality fescue tussock grassland, which is now rare in the Mackenzie Basin and supports an unusually diverse insect fauna. Moa bones have been found at this site.

Key areas west of SH8 not adequately protected are:

Land immediately west of SH8

Mackenzie Guardians do not support unencumbered freeholding of land immediately west of SH8. This part of the property is clearly visible from the main highway corridor and meets the "highest significance" and "high significance" landscape criteria used by the Department of Conservation to identify SIV's.

The land has significant landscape and visual values in particular the homogenous cover of short tussock grassland and grey shrubland over extensive areas of various inter-related glacial and fluvio-glacial landforms that are distinct and impressive, with high naturalness and legibility values and a highly memorable sense of openness and spaciousness.

The area is an "At Risk" Land Environment that still contains a significant presence of indigenous species representative and typical of this environment that should be sustained.

To retain the open grassland-shrubland landscape there should be a conservation covenant to avoid new buildings and the clearance of indigenous vegetation, earthworks, direct drilling and other soil disturbance, and tree planting; and, to require weed control, such as of wilding trees.

The Mary Range

Mackenzie Guardians support CA2, the designated 70 ha as shrubland on the northeast toe slopes of the Mary Range to be restored to or retained in full Crown ownership and control.

The western slopes of the Mary Range

The proposal fails to protect a large area of land with significant inherent values from Lake Pukaki to the crest of the Mary Range on its western slopes. This land is a

continuation of the same landscape, which has been recommended for protection on Simons Pass and makes the same contribution to the natural landscape setting for Lake Pukaki.

The area is visually important from the Tekapo Canal Road and is distinctive for its hummocky moraine, dryland habitats and indigenous vegetation.

This area forms 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. (N. Head 2007 Pukaki Lateral Moraine Botanical Survey – The Wolds Unpublished DoC Report.)

A rockland in the central part of the area of moraine retains considerable indigenous vegetation and is of great botanical importance. DoC (June 2004) "The Wolds Proposed Designation Report".

Shrublands of matagouri, small leaved coprosmas, mountain wineberry, porcupine shrub, climbers and other species are in good condition and provide habitat for several threatened species including a dwarf broom, coral broom, a bidibid and a mat daisy.

Mackenzie Guardians seek the return of this area to full Crown ownership and control to protect its significant values including its outstanding glacial landscapes and lakeside settings. Protection of a larger area will enable natural ecological processes to operate normally and be able to respond to changes in climate.

On the lower western slopes of the property adjacent to the Lake Pukaki shoreline, wilding conifers are overwhelming indigenous vegetation and Mackenzie Guardians request funding for the Department of Conservation to control the spread of wildings in this area.

Mt Mary – No public access

From the top of the Mary Range (995m) there are spectacular 360-degree views across the Mackenzie Basin to Lake Pukaki, the Ben Ohau Range and Aoraki. The opportunity to walk along the Mary Range would provide a real appreciation of the whole Basin, its structure and vastness, and would create a major recreation and tourism asset.

The whole area can be viewed from the top of the Mary Range so the intactness and legibility of the whole collection of landforms able to be seen together from east to west without interruption is an exceptional value."

(A. Steven Report to DOC 2007).

Mary Burn stream and associated wetlands

The Mary Burn wetland is one of the largest and most important wetlands in the Mackenzie Basin. Wetlands are important because there are so few remaining, less than 10% in Canterbury. All agencies involved with land management decisions should promote the protection and restoration of any remaining wetlands. A whole system or landscape scale approach is required.

Mackenzie Guardians do not support the freeholding of wetland and riparian corridors. To protect the continuity of riparian shrublands, all of the larger area and the full length of the Mary Burn stream south of the wetland should become conservation land and part fenced off to exclude stock, and ensure weeds and pests are managed under a conservation covenant.

The Mary Burn wetland area includes a wide variety of distinctive habitats for invertebrates, freshwater fauna and birds.

The dry outwash plain to the north of the wetland area should also be protected as a natural feature with a naturalistic vegetation cover, as its juxtaposition with the wetlands and the tussock and shrub covered moraine is a startling natural feature seen from the Canal road.

Public access should also be provided to the proposed Mary Burn Wetland scientific reserve to view the wetland and bird life.

Summary

High country landscapes are a national taonga (treasure). They are important to all New Zealanders.

Many of the remaining less-developed grasslands of the Mackenzie Basin are significant, especially the plant and animal communities of extensive, largely undeveloped landform sequences remaining to the north and east of Twizel. These areas meet all PNAP and Canterbury Regional Policy Statement criteria for significance, are present on land environments that are distinctive and mainly or wholly confined to the Mackenzie Basin, almost entirely comprise naturally rare ecosystems (National Priority 3) and wetlands (National Priority 2), and are the last remaining habitats of some of New Zealand's most endangered plant, bird and freshwater fish species (National Policy 4). Their irreplaceability and extreme vulnerability to ongoing loss makes protection a priority using international criteria.

(Dr Susan Walker, evidence to Upper Waitaki Hearing Para 90).

Tenure Review should seek to maintain and 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 the preliminary proposal substantially fails to provide for landscape and ecological protection and recreational opportunities, tenure review should be halted and the property remain as a pastoral lease.

Signed

Jane Zusters

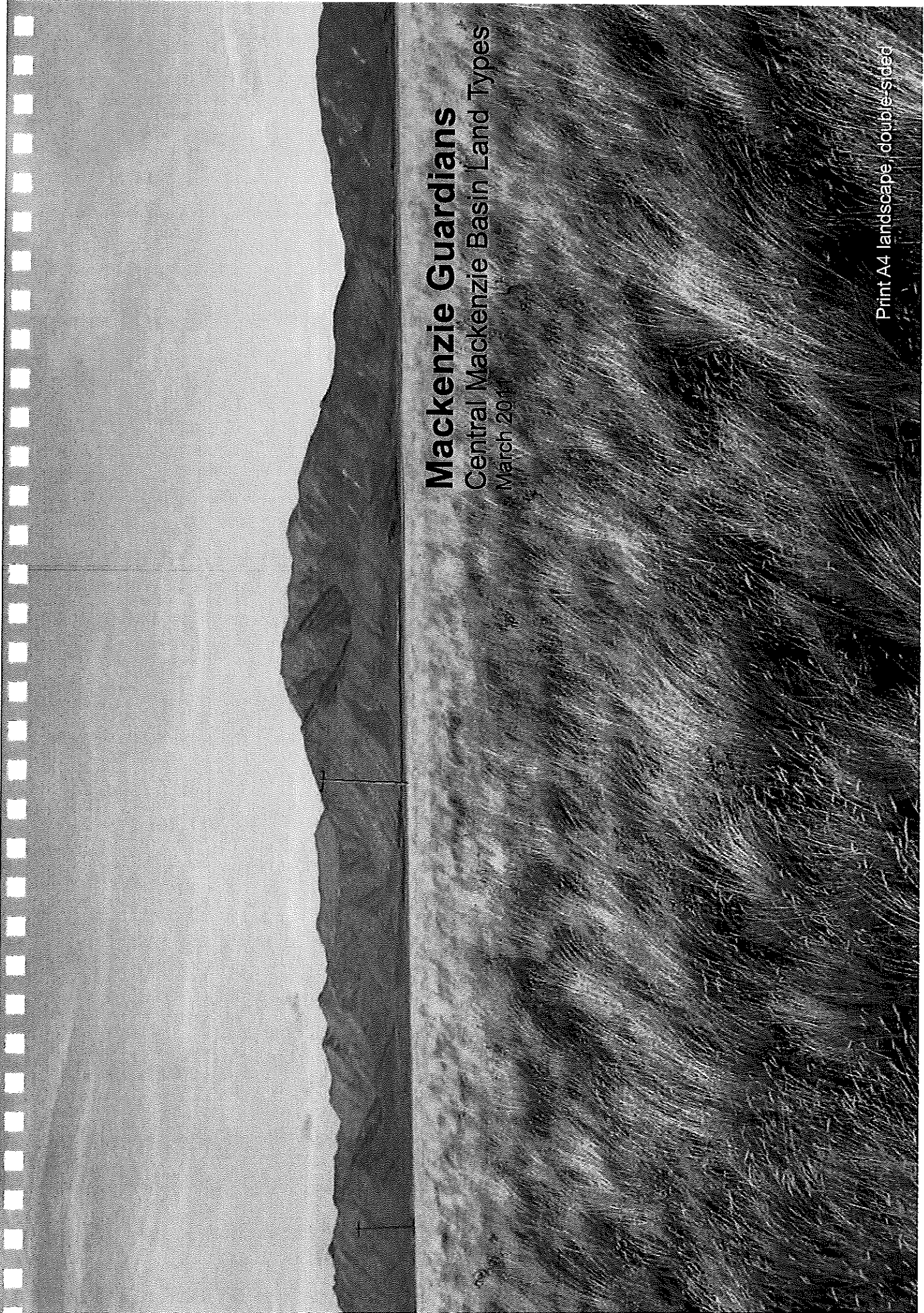
Spokesperson, Mackenzie Guardians Inc.

Mackenzie Guardians

Central Mackenzie Basin Land Types

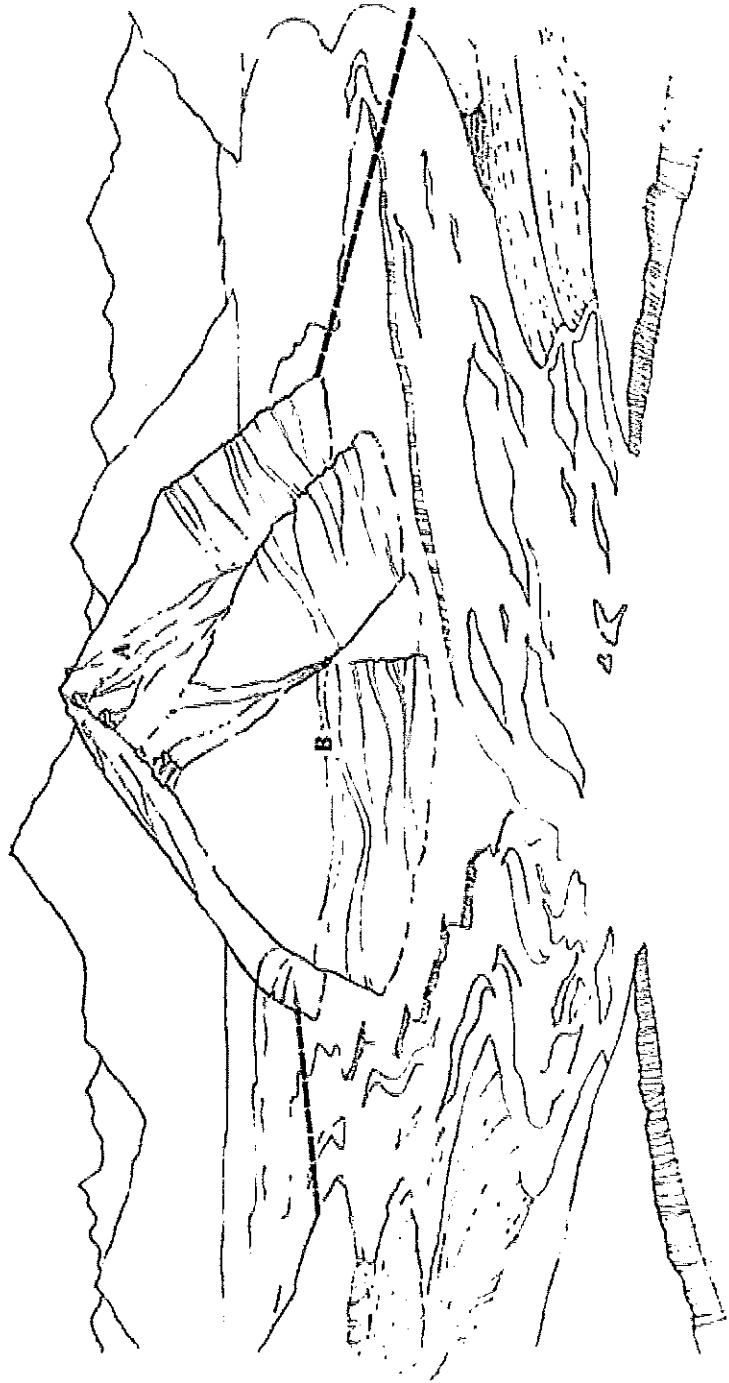
March 2011

Print A4 landscape, double-sided

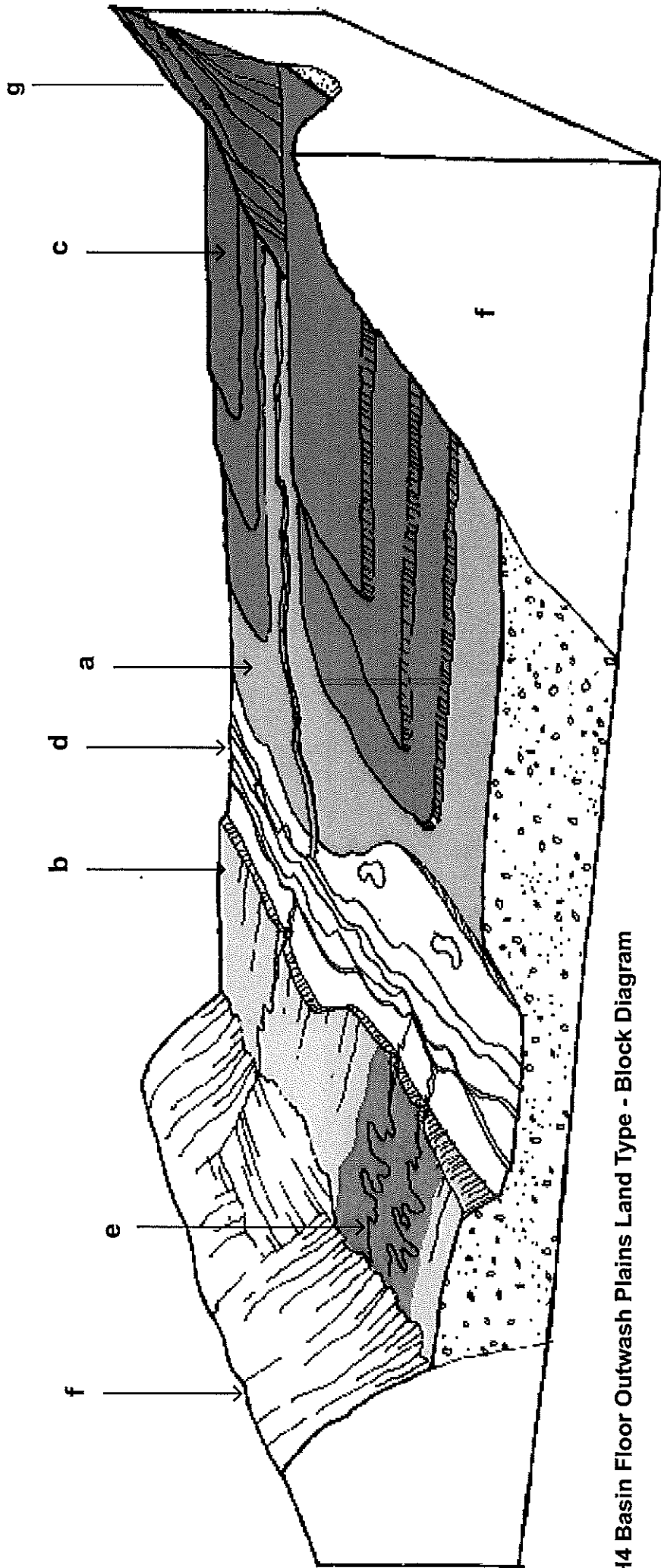


15. ISOLATED MOUNTAIN LAND TYPE

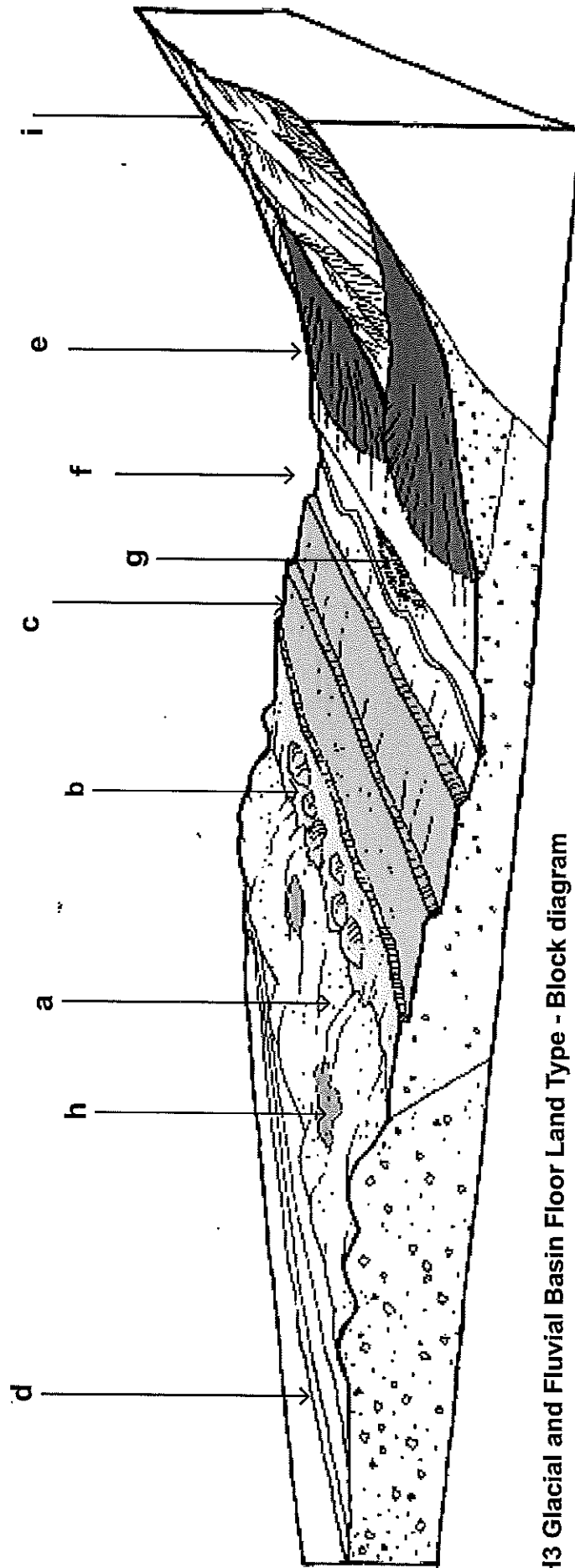
Steep to very steep, ice scoured, isolated mountain blocks, up to 1830 m, nested within the glacial and fluvial valley floor or basin land types; rock outcrop and scree are common at higher elevations. Lower steep to very steep often rectilinear slopes have been scoured by past glacial activity, higher summits currently undergo moderate periglacial processes. Elevation ranges from 280 to 1830 m and rainfalls between 560 and 2600 mm pa. Vegetation ranges from short tussock with manuka - kanuka scrub, dense sweet brier, fernland, semi improved pasture on the drier more easterly examples, eg. Mt Iron, to beech forest and short tussock with dense fernland in the wetter west, giving way up slope to snow tussock grassland, alpine scrub, and fellfield vegetation on the higher summits. Example locations include Mt Alfred.



H4 Land Type Example & H7 Isolated Mountain Land Type - Block diagram



H4 Basin Floor Outwash Plains Land Type - Block Diagram



H3 Glacial and Fluvial Basin Floor Land Type - Block diagram

H3 Glacial and Fluvial Basin Floor Land Type

Glacial and fluvial basin floor landforms, extensive ablation and terminal moraine, and associated meltwater channels, outwash terraces, minor lakes, fans, meandering floodplains, backswamps etc, and glacial moulded hills and mountains under 1300 m. Elevation ranges from 400 to 1300 m, with the balance below 1000 m, and rainfalls between 850 and 4800 mm/A. The land type includes parts of the Waitaki.

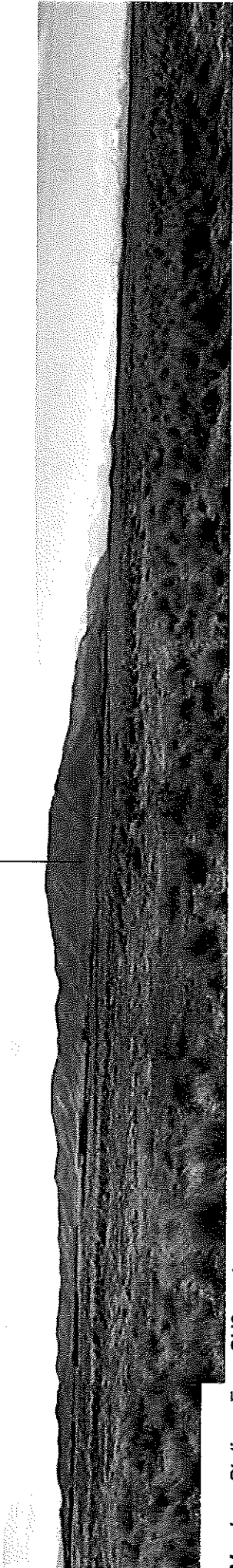
landform component	geological formation	elevation m	remnant native vegetation	present land use	agronomic potential	potential land use	potential impacts
(a) extensive ablation & terminal moraine fields	late Pleistocene moraine deposits, with loess	500 - 1200	short, red and snow tussock, matagouri and manuka scrub	extensive grazing	medium	semi intensive grazing, exotic forestry	increase in exotic pasture, shelter trees, fencing, exotic forest
(b) glacial outwash terraces and minor moraine dumps	late Pleistocene outwash gravels and moraine deposits	460 - 900	short, red and snow tussock, matagouri and manuka scrub	extensive grazing, limited intensive grazing	high	intensive grazing, feed cropping, exotic forestry	increase in exotic pasture, cultivation, cropping, shelter trees, fencing, exotic forest
(c) fluvial valley terraces	late Pleistocene outwash gravels	400 - 1000	short and snow tussock, matagouri scrub	extensive grazing, limited intensive grazing and feed cropping	high	intensive grazing, feed cropping, exotic forestry	increase in exotic pasture, cultivation, cropping, shelter trees, fencing, exotic forest
(d) lake shore benches and beaches	late Pleistocene outwash deposits	400 - 760	short tussock and matagouri scrub, moss tussock gravel fields	extensive grazing	high	intensive grazing, feed cropping, exotic forestry	increase in exotic pasture, cultivation, cropping, shelter trees, fencing, exotic forest
(e) fans	late Pleistocene and Holocene fan deposits	400 - 1000	short tussock and matagouri scrub, some red tussock	intensive and extensive grazing, feed cropping, shelter trees	high	intensive grazing, feed cropping, exotic forestry	increase in exotic pasture, cropping, shelter trees, cultivation, fencing
(f) meander floodplains	Recent alluvium and swamp deposits	500 - 800	wetlands, sedge, reed, and rushlands, red tussock, raupo	extensive grazing	high	intensive grazing, feed cropping	increase in exotic pasture, drainage, cultivation, fencing, decrease in scrub
(g) valley fill swamps	Recent alluvial and swamp deposits	400 - 860	wetlands, sedge, reed, and rushlands, red tussock, raupo	extensive grazing	very high	intensive grazing, feed cropping	drainage, cultivation, increase in exotic pasture, fencing
(h) terrace and moraine backswamps	late Pleistocene outwash and Recent swamp deposits	400 - 860	wetlands, sedge, reed, and rushlands, red tussock, raupo	extensive grazing	low	semi intensive grazing	decrease in wetland vegetation by grazing, drainage
(i) erosional 'hard' rock hill slopes	Foriesse Group sandstones and siltstones	610 - 1400	short tussock, matagouri scrub and fern, beech forest	extensive grazing	medium	semi intensive grazing, exotic forestry	increase in exotic pasture, fencing, tracking, , exotic forest, decreased tussock and scrub

H4 BASIN FLOOR OUTWASH PLAINS LAND TYPE

Basin floor fluvio-glacial outwash plains, terraces, piedmont fans, braided and meandering floodplains, and backswamps etc, and associated low hard rock ranges, and minor soft rock hills. Elevation ranges from 350 to 1400 m, with the balance below 600 m, and rainfalls between 430 and 850 mm/A. The land type includes parts of the Waitaki basin.

landform component	geological formation	elevation m	remnant native vegetation	present land use	agronomic potential	potential land use	potential impacts
(a) fluvio-glacial outwash plains	Pleistocene and late Pleistocene outwash gravels	360 - 700	short tussock and matagouri scrub	extensive grazing	low	extensive grazing, conservation forestry	management dependent, decrease tussock cover, increase in hieracium and exotic trees
(b) outwash terraces	late Pleistocene outwash gravels, some loess	350 - 900	short tussock and matagouri scrub	extensive grazing	low to medium	semi intensive grazing, exotic forestry	increase in exotic pasture, and trees, fencing
(c) piedmont fans	Pleistocene and late Pleistocene fan alluvium, some loess	360 - 900	short tussock and matagouri scrub	extensive grazing	low to medium	semi intensive grazing, exotic forestry	increase in exotic pasture, and trees, fencing
(d) braided floodplains	Holocene fluvial deposits	360 - 970	Raoulia cushion fields, moss tussock gravel fields	extensive opportunistic grazing	low	extensive opportunistic grazing	largely a 'natural' environment, exotic river control trees and 'weed' establishment
(e) meander floodplains and backswamps	Recent alluvium and swamp deposits	350 - 970	wetlands, sedge, reed, and rushlands, red tussock, raupo	extensive grazing	high	intensive grazing, feed cropping	increase in exotic pasture, drainage, cultivation, fencing, decrease in wetland vegetation
(f) low hard rock ranges	Torlesse Group sandstones and siltstones	610 - 1400	short tussock, matagouri scrub and fern	extensive grazing	medium to low	semi intensive grazing, exotic forestry	increase in exotic pasture, fencing, tracking, exotic scrub, decreased tussock and scrub
(g) minor soft rock hill slopes	tertiary non marine gravels	500 - 900	short tussock, matagouri scrub and fern, broadleaved scrub	extensive grazing	medium	semi intensive grazing, exotic forestry	increase in exotic pasture, fencing, tracking, exotic forest, decreased tussock and scrub

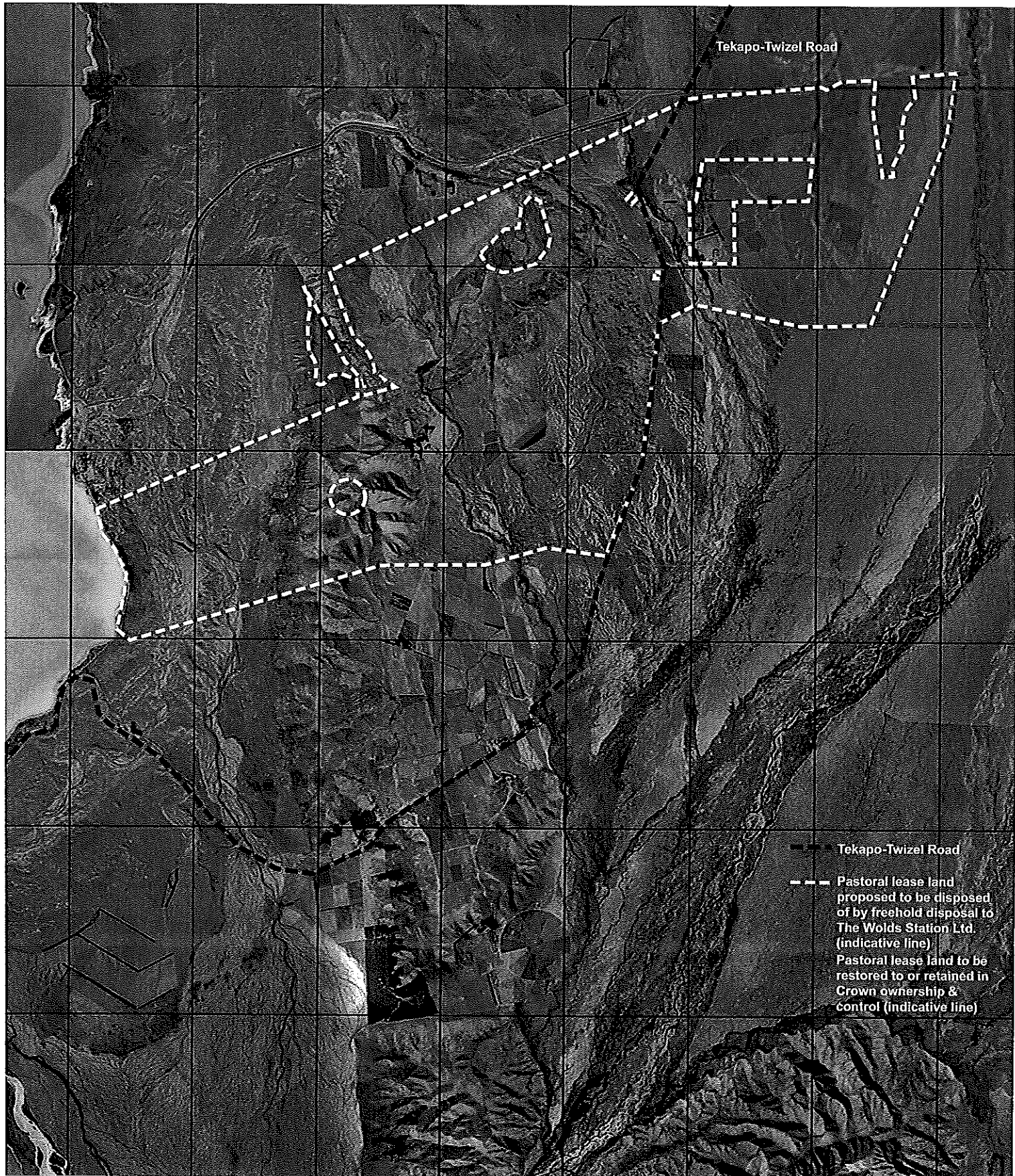
Mary Range



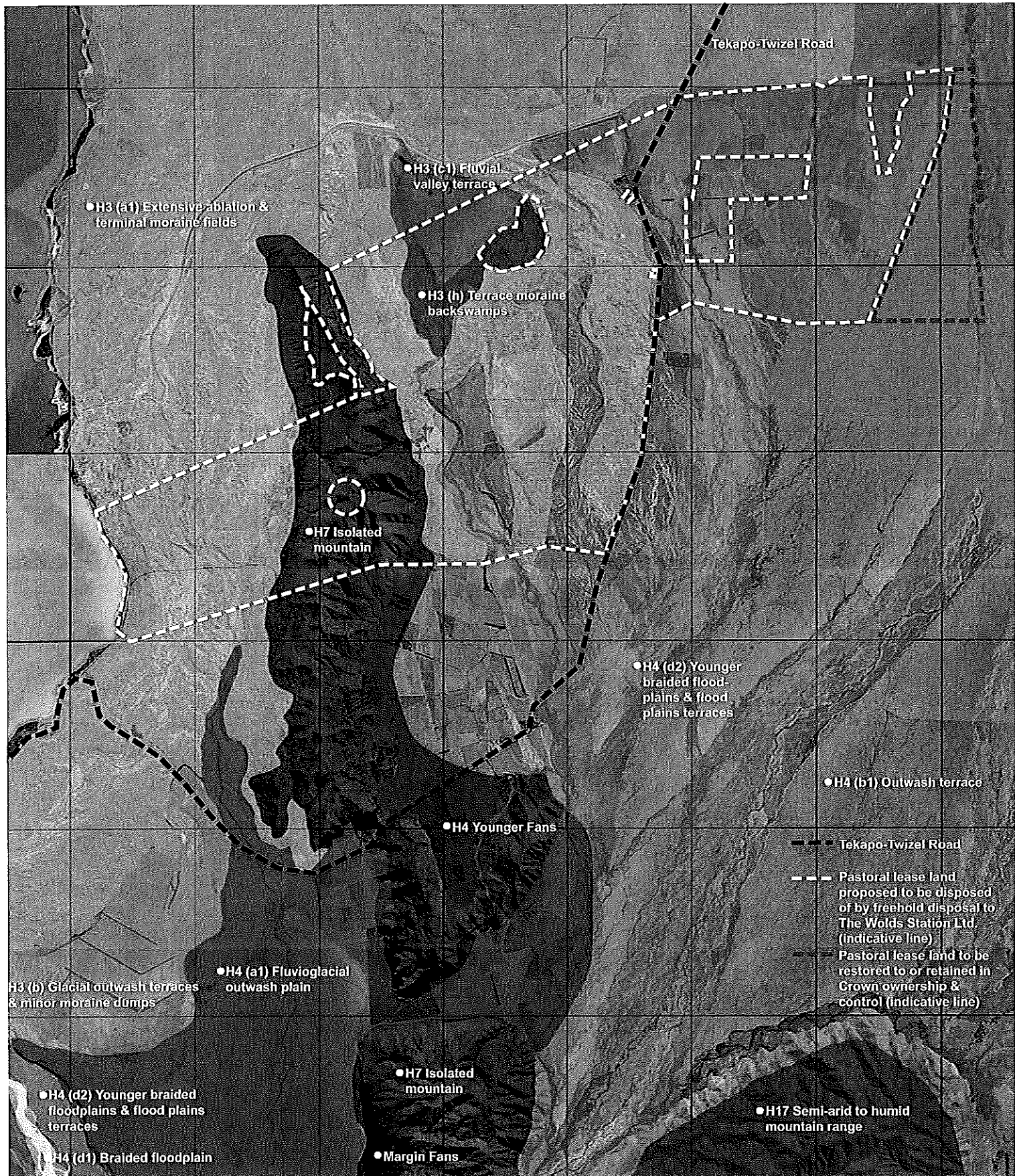
Maryburn Station - From SH8 west

Landform component	geological formation	elevation m	remnant native vegetation	present land use
A upper mountain slopes, and summits (> 1100 m)	Haast Schist Group schist of t.z. IIa to t.z. IV	1100 - 1830	snow and alpine tussock grassland; subalpine scrub; fellfield and sedge vegetation	extensive grazing, conservation land
B lower mountain slopes (< 1100 m)	Haast Schist Group schist of t.z. IIa to t.z. IV, colluvium, and minor glacial till	280 - 1100	short tussock grassland with manuka and broadleaved scrub and fern; beech and mixed hardwood forest	semi-intensive and extensive grazing, recreation, conservation land

The Wolds Tenure Review Proposed Designations
March 2011



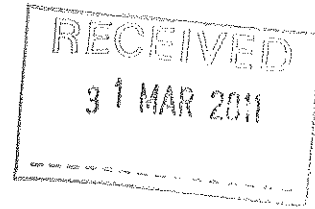
The Wolds Tenure Review Proposed Designations & Land Types March 2011



Mackenzie Guardians Inc. Website:
<http://mackenzieguardians.co.nz/>

125 040

Warren Dickinson
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Karori, Wellington 6012
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31 March 2011

To: Commissioner of Crown Lands, C/- Darroch Ltd

Re: Submission for the preliminary proposal for tenure review of Maryburn pastoral lease.

This submission requests that the Preliminary Proposal for Maryburn be withdrawn as it fails to protect the extensive Maryburn outwash plain, the moraines between Lake Pukaki and Mary Range, the eastern slopes of Mary Range, Mary Burn Stream and wetlands, and the Northern wetland, which have been identified by expert botanists, entomologists, geologists and Department of Conservation Staff as having outstanding significant inherent values (SIV) that warrant protection as public conservation land (or covenant) under the objects of the Crown Pastoral Lands Act, (CPLA).

I am opposed to the preliminary proposal because it fails to acknowledge the importance 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 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. I propose that areas of hilly moraines (not suitable for development or irrigation) be set aside as a scientific reserve for DoC to use these landforms as an educational resource to explain ice ages, natural climate change and the importance of preserving geologically significant sites as well as areas of high biodiversity.

The scientific value of the moraines would be greatly enhanced if they were protected as part of a continuous landscape. This allows future generations to have the opportunities to study the glacial geology of this area using techniques that have yet to be developed. To date, geologists have concentrated on the boulders lying on the moraine ridges because they are most valuable for the dating techniques which have been used. However, future techniques may place greater importance on other parts of the landscape in unpredictable ways. If protected through appropriate land tenure, these moraine systems will remain perhaps the best-preserved mid-latitude moraine systems on Earth, and remain of great scientific value.

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

1) Maryburn outwash plain – Conservation Area

- The triangle of land between SH8 and Tekapo River warrants protection as Conservation land to protect the full range of significant species occurring on the nationally rare basin floor and its significant landscape.

2) Lake Pukaki and crest of Mary Range – including Pukaki lateral moraine – Conservation Area

- This 1,293ha area of moraine warrants protection as public conservation land for its important values including the nationally significant terminal moraine site, threatened plants on low hill country, stony fans and terraces, kettle holes and turf communities.

3) Eastern Slopes Mary Range – Landscape Covenant

- This area requires a landscape covenant to protect the outstanding landscapes as it is relatively unmodified with few structures and a significant feature when viewed from the SH8.

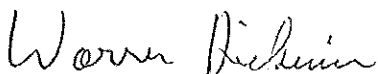
4) Mary Burn Stream and wetlands

- This area requires protection as a conservation area as it is habitat for threatened long finned eel, koaro, black fronted tern, black stilt, and banded dotterels.

5) Northern wetland

- This site of special wildlife interest for birds warrants protection by a covenant to ensure ecologically sustainable management.

Warren Dickinson 31-3-11

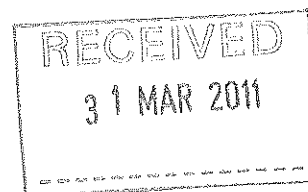
A handwritten signature in cursive script, reading "Warren Dickinson".

125041



WALKINGACCESS
ARA HĪKOI AOTEAROA

29 March 2011



Tony Sharpe
Darroch Limited
PO Box 142
Christchurch 8140

Re: Preliminary Proposal for Tenure Review of The Wolds Pastoral Lease Pt 008

Thank you for providing an opportunity to comment on the preliminary proposal for this tenure review. As you will appreciate, this is the first opportunity that the New Zealand Walking Access Commission (the Commission) has had to comment on this proposal.

In its response, below, the Commission identifies the specific and significant public access and enjoyment opportunities it wishes to see protected for the New Zealand public.

A] Introduction

Purpose and Objectives of the NZ Walking Access Commission

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

Central to its role is the Commission's leadership in negotiating the provision of free, certain, enduring and practical walking access to the outdoors for the New Zealand public and visitors.

The specific criteria that the Commission must take into account when considering walking access are set out in Section 11 of the Walking Access Act 2008. These criteria include vicinity of waterways, areas of scenic or recreational value, and provision of continuous physical access.

Focus of Submission is public access and protective mechanisms

The Commission's submission to this Preliminary Proposal is designed, as envisaged by the Walking Access Act 2008, to achieve appropriate and enduring public access in this popular area of New Zealand which has very high scenic and recreational value.

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

B] Submission

Existing public access

Depiction of existing public access on designation plans

There are areas where legal roads currently exist and which have not been clearly identified on the designation plan. The designation plan could be interpreted as showing these areas as currently being part of the pastoral lease, which they are not. The green border depicting the pastoral lease land needs to be extended along the legal road boundaries to address this.

The Tekapo Twizel Road (SH8) bisects the pastoral lease south of the Tekapo Canal.

There are approximately 1.3 kms of unformed legal road near the northern boundary of the lease, running due south to the freehold block.

There are some 4kms of unformed legal road on the west side of SH8, opposite the homestead, running west then north-west, through the proposed scientific reserve to the north western boundary of the lease.

The Commission seeks to have:

1. *The boundary of proposed freehold and Conservation Area land shown as adjoining, not including, all parcels of legal road.*

Desirable public access

Clarification of Marginal Strips

The disposal of Crown land, through the implementation of this tenure review, will result in the creation of 'marginal strips' adjoining qualifying water bodies under s 24 of the Conservation Act 1987. These strips, reserved from disposition, will generally provide for public access.

The Preliminary Proposal gives no indication of which water bodies qualify and what, if any, marginal strips will be created. This makes it difficult to assess the adequacy or otherwise of public access requirements. Opportunities, such as easements, to provide access contiguous to non-qualifying but appropriate waterways or to provide continuous access between existing legal roads cannot, therefore, be analysed with any confidence.

The Commission seeks to have:

2. *An assessment of qualifying water bodies under s 24 Conservation Act 1987 made publicly available and proposed marginal strips depicted on the plan, to clarify current access gaps and enable desired public access requirements to be readily identified and addressed.*
 - *The New Zealand Walking Access Commission specifically requests a copy of this assessment for The Wolds pastoral lease to enable the Commission to meet its statutory requirements as envisaged by the Walking Access Act 2008.*

Access to Mt Mary and the Mary Range

Mt Mary is a highly desirable destination in this part of the Mackenzie, yet there is only a proposed designation for 'telecommunications' with no provision for public access.

Mt Mary and the Mary Range are prominent elevated landscape features which provide excellent views over the Mackenzie basin. The Maryburn Conservation Resources Report identifies that trampers often traverse the Mary Range, and it is noted in The Wolds Conservation Resources Report that access to the Mary Range would be desirable. There are also significant opportunities to provide for additional public access and enjoyment opportunities by including mountain biking and horse trail access along such a route.

The Wolds tenure review presents a unique opportunity to negotiate highly desirable public access to, and along, the central section of the Mary Range. This would provide for day walks, at least, and needs to be integrated into wider walking, mountain biking and horse riding opportunities on the Mary Range.

Integrated access analysis needs also to be addressed as part of tenure review negotiations of neighbouring properties.

The Commission seeks to have:

3. *Provision made for public walking, mountain biking and horse trail access to Mt Mary, and along the top of the Mary Range, and*
4. *Appropriate provision for car parking to facilitate public walking access.*

Public access to area CA2 shrublands and rocklands

CA2 is identified as containing a range of significant inherent values, particularly shrublands and rocklands. Easements for public access between the two portions of CA2 are proposed ("g - h" and "i - j"), yet there is no provision as part of this review for the **public** to actually obtain access to CA2 to appreciate the significant inherent values. The proposal limits access to "Minister of Conservation management access easement" whereas CA2 is proposed for the benefit of the public, not just the Minister.

The Commission seeks to have:

5. *Provision made for public walking access to CA2 to enable the public to visit and enjoy the identified significant inherent values.*

Public Access to Area R Scientific Reserve

The Scientific Reserve over part of the Mary Burn wetland has provision for Minister of Conservation Management access, but not for public access. This is a spectacular wetland which could be readily appreciated by the public after a short 2-3 km walk. While legal access does exist in the form of an unformed legal road, from a practical perspective, public access on the same line as that proposed for the Minister of Conservation should be provided.

The Commission seeks to have:

6. *The easement "a - b" to R (Scientific) amended to also provide for public foot access.*

Public access to area CA1

There does not appear to be any public access provided to reach CA1. This may be provided from adjoining properties, but the provision of public access as part of this review is warranted.

The Commission seeks to have:

7. *Provision for public access to CA1 provided for as part of the review; and.*
8. *Appropriate provision for car parking to facilitate public walking access.*

Thank you for the opportunity to make a submission on the Preliminary Proposal for tenure review of The Wolds pastoral lease. We request advice in due course as to how the points we have raised have been progressed and what, if any, amendments are subsequently proposed to the Preliminary Proposal designations.

We draw your attention especially to the request for a copy of the assessment of qualifying water bodies, under Section 24 Conservation Act 1987, for The Wolds pastoral lease.

Yours sincerely



Mark Neeson
Chief Executive.

64 3 4350512
Submission - The Molds' Station 125042

Attn. Mr. Sharpe. Tenure Review.

I favour the proposal, but
the outcome has to be viable
for the farmers, and the Public's
outcome sustainable.

The legislation of the Act must
be adhered to.

Marion Seymour,
Ferintosh Stn.,
Private Bag,
Fairlie 7949.
ph/fax 03-4350512.

DARROCH LTD

31 MAR 2011

RECEIVED

30.3 2011.

125043

Caroline Bongzon

DARROCH LTD

31 MAR 2011

RECEIVED

29 March 2011

*Tony Sharpe
Darroch Limited
41 Tarbert Street
PO Box 27
Alexandra 9320*

Dear Sir,

I am writing to you as a submission in support of The Wolds Tenure Review proposal.

I think the proposal adequately protects the important natural values remaining on The Wolds given that it is a more developed property than most in the Mackenzie. The public will gain access along the Irishman River, the Maryburn and to the East side of Mt Mary which should be adequate. Public access up to the summit of Mt Mary should not be allowed due to the aviation and communication structures there as well as preventing stock adequately grazing the upper slopes.

The land disposed as freehold will be able to be farmed satisfactorily.

The Mackenzie District Council's District Plan also provides a good level of protection for the proposed freehold land against inappropriate development.

Yours faithfully

Caroline E. Bongzon.

19/4/11

Submission Concerning the Tenure Review of "The Wolds"

I support the Tenure Review of
"The Wolds" that is proposed.

I see it as not a matter of changing
the rules or getting special rights
but a change of land title, giving
the holder confidence to carry on in these
difficult times.

This property has been carefully guided into
a better state through dedicated hard work
and planning for very little reward and in
spite of the many obstacles to progress
thrown in the way.

Caroline Donzon
97 Dyers Pass Rd.
Christchurch 802.

Tel: 03-337 3763
021 203 46 26

125044

Tony Sharpe

From: Alan McMillan [club.wingatui@xtra.co.nz]
Sent: Thursday, 31 March 2011 8:10 p.m.
To: Tony Sharpe
Subject: submission Wolds preliminary Proposal

Commissioner of Crown Lands

C/ Darroch Ltd

Your address

PO Box 143

Christchurch

Email: tony.sharpe@darroch.co.nz

Date 31st March 2011

Submission To: The Wolds Preliminary Proposal

The Preliminary Proposal fails to protect the extensive outwash plains and needs to be withdrawn

For that reason alone

However the problems we see do not stop there as the proposal also fails to protect the Maryburn wetland catchment, the slopes of the Mary Range, and the Tekapo River terraces and the outwash terraces on the unoccupied Crown Land

We understand that a wide selection of scientific opinion has also commented that these areas have significant values that justify protection as public conservation land

As an organisation dedicated to the enhancement and protection of public access to land suitable for public recreation we have also a major concern that the Preliminary Proposal fails to provide for secure public access particularly across to and over Mount Mary from the State Highway ..

- To ensure secure public access and public enjoyment I ask that there be public access to Mt Mary from the State Highway as well I would 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.

In addition to the above there are specific aspects of the proposed preliminary proposal that do not meet the objects of the Crown Pastoral Lands Act and these should be addressed

For instance :

(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.
- 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 values , 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.

Considering the outstanding landscape values clearly associated with this iconic area plus what appears to be a lack of attention to conservation values we believe this proposal falls short of acceptability and should be withdrawn pending a more serious consideration of those issues.

Name:\\

Alan McMillan

19 Haggart Street,

Wingatui, R.D. 2 Mosgiel

125045

Tony Sharpe

From: Matthew [solem@xtra.co.nz]
Sent: Tuesday, 29 March 2011 11:20 a.m.
To: Tony Sharpe
Subject: Submissions on the Wolds & Maryburn Preliminary proposals
Attachments: Submission To The Maryburn Preliminary Proposal.pdf; Submission To The Wolds Preliminary Proposal.pdf

Hi Tony

Please find attached two submissions one for the Wold and the other for Mary Burn.

Thankyou for the opportunity to submit.

Regards

Matthew & Jo Sole

(Matt) Matthew Sole | Magdalen Hills

1936 Omakau - Chatto Creek Road, RD3, Alexandra 9393

(03) 447 3336 | Mob: (027) 436 7444

Email: solem@xtra.co.nz

Matthew Sole

1936 Omakau-Chatto Creek Road
RD 3
ALEXANDRA 9393

29 March, 2011

Commissioner of Crown Lands
Darroch Ltd
PO Box 143
Christchurch

Dear Sir or Madam:

Submission To: The Wolds Preliminary Proposal

I Matthew Sole am self employed engaged in statutory land management contract work and archaeological assessment 2008 to the present. Previously employed for MAF as an agricultural field officer 1982 – 1996. Employed by DoC as a programme manager in Recreation and Heritage and subsequently Community Relations involving RMA and Statutory Land Management, 1996 – 2006. Prior to private contracting I was engaged on contract with Central Otago District Council 2006 -2008 to complete feasibility studies on Cycling and Walking trails for Roxburgh to Lawrence and Alexandra via Roxburgh Gorge to Roxburgh, and drafting a Central Otago Outdoor Recreation Strategy.

In a voluntary capacity my partner and I are actively involved in weed control (wilding pine & brier) and plant restoration projects via the Lindis Conservation Group and Forest and Bird operating around Lindis, Ohau and Lake Pukaki.

We strongly oppose the preliminary proposal in its entirety as it fails to protect extensive areas which have significant inherent values and seek that it be either renegotiated to ensure protection of the SIVs or withdrawn to enable it to be informed by the outcomes of the collaborative planning process.

While residents of Central Otago we are originally from Canterbury, where most of our wider family still reside. As a family we are active in the outdoors, being a third generation raised with a deep attachment to and appreciation of the outdoors. We have raised our own children in a similar vain and they are in turn exposing their own children to joys and challenges of wider outdoor high country experiences.

These experiences through the generations have involved camping, tramping, fishing, hunting mixed with landscape photography, botanising, amateur ecology and geology, and heritage appreciation. These outdoor encounters have developed our individual resilience and self-reliance. Repeated and on going exposure to nature and its elements requires understanding of risk and development of risk management.

These events and knowledge have lead to a great love and appreciation of the wider open more remote outdoors and with it a greater understanding of needs for on going conservation custodianship for our future generations so they too can be exposed to the learning and growth that can be gained from engaging with nature in its more natural and raw state.

With this growing understanding comes appreciation of the complexity and increasing threatened state of these high country systems which has resulted in active engagement in protecting them from the surrounding threats of modern extractive land uses. Such as over extraction from life sustaining water ways and wetlands; toxic and contaminated nutrient inflows at multiple levels; weed and pest incursions resulting in ever increasing compromise to existing natural ecological systems; growing rates of flora and fauna extinctions; sweeping large scale monoculture land use conversions resulting in destruction of highly sensitive and fragile landscapes and ecological systems. Monitoring of benchmarks in water quality, biodiversity loss, weed incursion, soil quality are all trending negatively. Existing planning, education, rules and enforcement are not even stemming the negative trends let alone stabilising the damage and destruction to ecological systems, we are only beginning to understand.

For this reason at minimum the status quo must remain while a more collaborative planning process is established and completed. As custodians for future generations it is our duty to understand our environment and pass it on in the same or better state than when we received it.

Overview

The Wolds are located in the central part of the MacKenzie Basin and currently form part of the distinctive natural landscape features that make the MacKenzie what it is in its most natural form. The central McKenzie Basin is now clearly under real and permanent threat as has been so graphically realised by consequent land tenure and or land husbandry changes that have occurred in the southern end of the MacKenzie Basin between Twizel and Omarama. This has come at significant loss and destruction of landscape, biodiversity and ecological systems and to a lesser but still significant degree geological land form.

The vast expanses of grassland covered alluvial terrace, outwash and moraine forming undisturbed sequences over extensive areas are the defining elements collectively contributing to what is the essence of the captivating and enduring outstanding landscape that is the Mackenzie Basin. Permanently and enduringly etched into one's experience of the Mackenzie.

The distinctive landscape collaboration of the Basin is fundamentally defined by the presence of the vast uninterrupted expanses of moraine and outwash forms under a predominantly indigenous cover and in today's terms a landscape with a high level of apparent naturalness. Something we highly value and return to time and time again because of its near untouched state and enduring ability to captivate.

The vast treeless expanses of plain and moraine under a homogenous tawny, golds through to greys textured cover, back dropped by distant mountain ranges, imparts a sense of vast scale and exceptional openness and spaciousness, an impressive visual simplicity and high levels of coherence and legibility. Combined with the clean clear air and dawn and dusk light interplays with the landforms makes this a unique experiential occurrence. The defining factor in making the Basin so memorable and alluring.

The area has highly significant ecological values. The area is almost entirely comprised of "At Risk Land Environments", among the most threatened environments with between 20-30% of these types left with indigenous cover. Very little of these LENZ are currently protected (<1-2%??).

Frost hollows, inland sand dunes and inland outwash gravels and braided riverbeds are originally rare ecosystems which are a National Priority Three for ecosystem protection.

Specifically we support and or make the following points. They are drawn from our own observations and experiences or adopted from other sources that we wish to endorse. We acknowledge and thank Forest and Bird and members and other like minded people for their efforts and input.

Lake Pukaki - western slopes of Mary Range – seek protection as a public conservation area

- We oppose the freeholding of the hummocky moraine between Lake Pukaki and the Mary Range and the western slopes Mary Range.
- We ask that this be a conservation area and returned to full Crown ownership and control for its significant inherent values, including outstanding: glacial landscape and lakeside setting, Mary Range is a notable natural feature, part of the scenic backdrop to Lake Pukaki and is visible from SH8 to Mt Cook; nationally rare ephemeral and kettlehole wetland ecosystems; dryland vegetation, shrubland remnants of pre-human vegetation.
- We request the Commissioner as the Crowns representative and administrator (where the lessee has abandoned good custodianship practise) to seek funding to support DOC in controlling the wilding pines that have been abandoned.
- We seek public access to and through the public conservation land to Mt Mary from SH8, 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 walking and biking route and has panoramic views overlooking Lake Pukaki and should be continued through Maryburn with access out to the HW.
- We seek public access along the lower faces and dry land moraine sequences above and overlooking Lake Pukaki. In the future a DoC campsite should be considered along Lake Pukaki to enhance recreational utilisation and provide a base for freedom camping.

Southeast face of Mary Range - seek a landscape covenant

- We ask that the southeast face of the Mary Range be protected via a Landscape covenant under the Reserves Act for the landscape SIVs, which include relatively unmodified landscapes with fescue tussock grasslands and shrublands visible from a major tourist highway and from the Mt Cook HW80 opposite and the canal road along Lake Pukaki.

Maryburn Wetland and Maryburn Stream – we seek extension to become a scientific reserve

- We ask that the proposed scientific reserve be extended to cover the full 765ha recommended by DOC to ensure protection of the following SIVs: 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.
- Protection of wetlands is a national priority 2 for ecosystem protection. Only a very small percentage of the naturally occurring wetlands in lowland areas remain today and many are in private ownership. In recent years the wetlands and riparian values have been destroyed and or highly compromised by the recent conversions from extensive sheep grazing to highly intensive dairy practises in the southern end of the basin valley between Twizel and Omarama. The

wetland and riparian systems remaining in the central Basin tend to be of a large scale and still retain high water quality and remnant indigenous flora, with a strong recovery potential.

- The area makes a highly important contribution to intact ecological sequences at a landscape scale. This includes most extensive and intact sequences of low altitude naturally rare ecosystems.
- These areas are habitat for a number of rare and threatened species, many of which are endemic to the Mackenzie Basin and including the black stilt the world's rarest wading bird
- We seek inclusion of all of the adjacent glacial features that are fast diminishing under more intensive land use change in the basin. The peri-glacial outwash is a unique feature that could be lost for all time.
- We seek public walking access from the HW to these wetlands

Tekapo River Terraces -extend the proposed Conservation Area

- We ask that the proposed Conservation Area (CA1) be extended to protect the full 888ha which contain SIVs, including relatively undeveloped ecosystems on recent outwash terraces representative of those originally present; habitat for five threatened plant species, including a threatened broom and a convolvulus, four threatened lizard species and three threatened bird species.
- We support the retention of dryland outwash and alluvial surfaces adjacent to braided river system as a conservation area.
- We do not support proposed boundary and new fence line because it fragments landform, ecosystem and would result in undesirable visual outcomes.
- We support boundary that is more inclusive of the whole landform surface and maintains the integrity of the landform and associated ecosystem.
- This should also include considering how it relates to the adjoining proposed conservation area on Mary Burn pastoral lease where the landscape values of naturalness, legibility and visual coherence should also be retained.
- There is no information on LENZ or their threat status. The eastern moraine and terraces are in "At Risk" LEs. They include outwash surfaces/ecosystems which are naturally rare ecosystems, a National Priority 3 for protection
- We would expect that the ecological values present on Maryburn would also be found here. The CRR reports it is expected that the rare spring annuals are likely to be found in the hollows with mat and cushion vegetation. The CRR reports that the threatened *Lepidium sisymbrioides* (Nationally Endangered) is present on the top of the terrace riser, an environment with specific parameters including very thin stony substrate, extreme wind exposure, dryness and frost exposure. *Pimela pulvinaris* and *Convolvulus verecundus* (Declining) are present too on the riser crest and on the terrace forms. Also too Declining *Carmichaelia vexillata*.
- We support the inclusion of the terrace and a part of the higher rolling moraine surface under fescue tussock grassland would protect an intact sequence of habitats including terrace crest, scarp, footslope, outwash and recent alluvial terrace through to gravel riverbed. This has much greater value than protecting only one or two habitats as it allows for natural ecological processes to continue to operate and for species to migrate in response to climate change. The larger the area the more resilient it will be and the higher its ecological value.
- Nowhere else along the Tekapo River or indeed in the central basin is there uninterrupted juxtaposition (or intact sequences) of high old "Wolds" moraine, massive terrace riser and outwash/alluvial terrace – further south there is no moraine adjacent and further north the Canal

and Tekapo River separates moraine and outwash. The areas of Wolds moraine are altogether limited in the Basin being the oldest.

- 6 species of lizards were recorded from the Tekapo River terraces including "At Risk" species (Spotted Skink, Green Skink, Jewelled Gecko, Long Toed Skink). Full protection of remaining habitat is important.
- The terraces with their low sparse vegetation cover are important and distinctive habitat for invertebrates in particular threatened grasshopper species. The species *Sigaus* are found on the upper terraces; and the Robust Grasshopper on the lower terraces.
- This revision would include the spectacular terrace riser which might otherwise have trees planted on it through which process it would become obscured from view and lose its landscape value.
- We recommend to best retain the impressive open and large scale landscape which is highly distinctive of the central Mackenzie Basin, the existing intact sequence of landforms and vegetation cover between the area of border dyked paddocks and the Tekapo River should be protected in perpetuity. With effective control of rabbits and exclusion of stock, there is good potential we understand for this area to regain its natural ecological health such as is occurring in the Tekapo Scientific Reserve. Because of the harsh environment it would also be relatively easy to control any wilding pines.
- The areas included have low to very low pastoral value and would currently contribute little to the productive capacity of the property. They would require extensive modification to support productive pastoral use; or would be potentially forested. Either option would have significant adverse effects with respect to fragmentation of intact landforms, ecosystems and landscape integrity and would very likely result in loss of rare and threatened species.

Patersons Ponds

- We ask that these artificial ponds be protected for their SIVs and recreational values. SIVs include habitat for threatened bird species including black-billed gull and black-fronted tern. The area is popular for camping, picnicking and swimming. Bird watching and walking are other activities
- We ask that public access is secured. No marginal exists.

Northeast Triangle – Unoccupied Crown land – we seek protection as public conservation land.

- We ask that this area be protected as a conservation area for its SIVs, including; good-quality short tussock grasslands, with a moa bone site.

Outwash plain east of Mary Range and SH 8 - seek protection as public conservation land

- Ask that this area be protected as a conservation area for its SIVs, including remnant indigenous vegetation on a threatened environment, outstanding scenic and landscape values, due to its naturalness, sense of space, and high visibility from SH8.
- This provides the iconic foreground frame for views of Aoraki/Mt Cook and its supporting massifs. It meets the "highest significance" and "high significance" landscape criteria by DoC to identify its SIVs.
- As a nationally and internationally significant highway corridor land cover must be managed in its current state and as an "At Risk" land environment it must be protected as a conservation area.

● Page 6

March 29, 2011

Artificial pond Intersection SH8 and Tekapo Canal - seek a sustainable management covenant.

- We ask for a sustainable management covenant to protect the pond and associated swamp which includes threatened plants.

Thankyou for the opportunity to submit and for considering our submission.

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Yours sincerely,

Matthew and Jo Sole