

## Crown Pastoral Land Tenure Review

Lease name : *The Wolds*

Lease number : PT 008

### Public Submissions Part 5

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*

125046

DARROCH LTD

22 MAR 2011

RECEIVED

Chris Pearson  
5322 Whitetail Dr #9  
Springfield IL 62703  
USA  
PH 217 585 6803

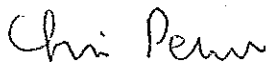
Monday, March 7, 2011

Commissioner of Crown Lands  
c- Darroch Ltd  
PO Box 143  
Christchurch

To Whom it may concern

I would like to make the following submission for Preliminary Proposal for the Tenure review of the The Wolds pastoral lease which is undergoing tenure review under the Crown Pastoral Land Act 1998. I accept that this property is primarily modified land with relatively little high quality native vegetation left. I also accept that the areas that are designated for retention in full crown ownership are probably, from a conservation basis, the most important areas on the lease. I am pleased to see that the largest piece of proposed DOC land (CA1) will link up with a larger area in the Mayburn lease which is also going through tenure review at the same time. There are two issues that I feel should be addressed in this tenure review before it is enacted. The first is that the easement labeled a-b in the designations plan which is currently a Minister of Conservation Management easement should be changed to a should be changed to a Public and Minister of Conservation Management easement. If this is to be public land the public should be able to go there. If access control is needed to protect the scientific values of area R then DOC has powers to limit access as part of its management plan but public access should not be precluded by the form of easement that we create. I would also like to see the easement e-f which currently is a "Continuation in force of existing easement for Crown access to transmitter site" should be upgraded to allow for public access. The Telecommunications area is obviously retained for its value as a transmitter site but it is also an outstanding view point and it could be valuable as a walking track.

Sincerely yours,



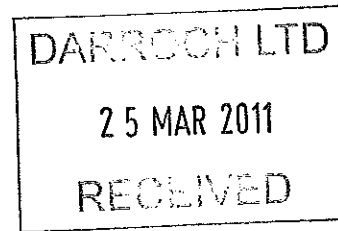
Christopher Pearson

Bryn Murray

The Wolds Station

PO Box 154

Lake Tekapo



22nd March

To whom it may concern

In my Opinion it is an excellent option that the Wolds Station proceeds through tenure review.

With the gain to the public of native country which they are able to access. This is a highly productive high Country sheep station for its size. When this process goes through the tax payer will not be fitting the bill for the already 60 odd thousand spent on rabbit control or the thousands per annum also spent on weeds. The government and hence the public already own and have access to a third of this nations land mass and does not need to own or pay for the conservation of any more. As John key states we are in a tough economic time and need to increase production of our country not decrease it. With this in mind it is of the utmost importance that the people farming this land can own it and

Yours Sincerely

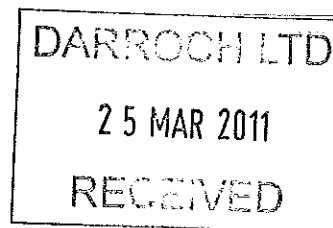
Bryn Murray



125048



32 Newall Av.  
Fendalton.  
Christchurch.  
033519709.



21 March 2011

Tony Sharpe.  
Darroch Limited.  
41 Tarbet St.  
PO Box 27.  
Alexandra 9320.

Dear Sir.

I am writing to you in support of The Wolds tenure review proposal.

The Wolds has been farmed since 1856, Over this time it has been greatly improved, and well managed . The nation as a whole has gained by the external revenue this farm has made.

The first crop's where sown in the 1900,s , over sowing and top dressing in 1960 . The government in 1970 ,s proposed irrigation for The Wolds, this began in 1978.

The rabbit number's over the years have gone up and down the poison for last year was \$60,000 it will be the same this year, This farm need's to be viable to make external dollars and be sustainable , the proposal allows the public's interest to be met and a sustainable farm

Sincerely,

Rhiannon Mckenzie -Smit

R 2 McKenzie Smit

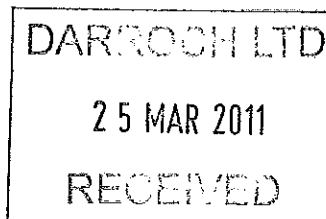
125049

KIM O'NEILL.

Flat 2  
45 Chamwood Crescent  
Bishopdale  
Christchurch.

23 March 2011

Tony Sharpe.  
Darroch LTD.  
41 Tarbert Street.  
PO Bo 27.  
Alexandra.



Dear Sir.

I am writing a submission in favour of The Wolds Tenure Review.

The proposal put forward for The Wolds, meets the requirements of the legislation.  
There is both the prospect of a sustainable farm for the future, and this is very necessary for the well being of this land, these people are the best custodians of this land.  
The needs of the public having been certainly been met.  
With the riparian Ares, there is good access to the river, there is a large area of wet land protected, scientific protection of special species etc.

I feel this is a very good deal for the public and achieves what this process is all about.

sincerely,

Signature

*Kim O'Neill*

125050

Already received  
email**SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR  
THE WOLDS PASTORAL LEASE**

RECEIVED

05 MAR 2011

MY NAME IS *BRIAN LINDSAY TURNER*, WRITER AND LONGSTANDING ENVIRONMENTALIST. I SUPPORT THOSE WHOSE SUBMISSION BEGINS WITH THE FOLLOWING STATEMENT AND REQUEST:

**Preliminary proposal summary**

I understand the preliminary proposal for the 7,934 ha. Wolds pastoral lease to be:

a) Restoration of 760 ha. to full Crown ownership and control being:

- Tekapo River terraces - 600 ha. (CA1)
- Mary Range – north east toe slopes - 70 ha. (CA2)
- Telecommunications reserve – summit of Mt Mary (no public access) – 2.4 ha.
- Mary Burn wetland - scientific reserve – 85 ha.

b) Freeholding 7,176 ha. subject to a conservation covenant over a 5 ha. boulderfield on western slopes of Mary Range overlooking Lake Pukaki.

'This submission requests that the Preliminary Proposal for the Wolds be withdrawn because it fails to implement the Crown Pastoral Lands Act (CPLA) 1998. 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 outwash terraces on the unoccupied Crown Land which have 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 Part 2 of the CPLA.'

That said I have some observations and requests of my own, as follows:

I first began to visit the Mackenzie with my family in the 1950s. Its subtleties and dramatic, sweeping expanses of hills, mountains, fast flowing rivers and streams, and magisterial sky scapes made an indelible impression on me. Since then, unrelenting efforts have been made to transform the country in ways intended to utterly transform its natural character. Further intensive farming of any kind is inappropriate and unsustainable in the Mackenzie.

Last winter, on a still clear day, I rode my bike from Twizel to Tekapo. In places the reek was appalling; the same is true when traveling from Omarama to Twizel where the large races and massive pivot irrigators and all that goes with them are offensive and alien.

As an angler, and writer on angling and other recreational and environmental activities and issues, I am familiar with most of the rivers and streams in the Mackenzie and, for that matter, in most other parts of the South Island. Nearly all of our waterways have deteriorated, many badly indeed, in my lifetime. This trend – which the Mackenzie is following -

continues and it is shameful, makes a mockery of the nation's claim to be 'clean and green' and '100 per cent pure'.

Mismanagement of land and water, of our environmental inheritance, continues in ways that highlight the extent of our national hypocrisy, hypocrisy borne of confusion and delusion. It is way past time that we accepted the truth in the statement that environmental protection must come first, that such is a benefit not a cost to society. The economy must serve the environment, not the other way round, if land and water and nature in its entirety is to be able to maintain the integrity necessary to support us, and not further threaten bio-diversity, in the long-term. This is more necessary now than ever before in our history of occupation here.

The American agrarian and writer Wendell Berry was right to point out that humans not only have problems, we are problems. He emphasised the need to be aware of and respect the integrity of things, pointing out their value in themselves and in terms of the roles they play in a larger whole. When we fail to understand or choose to disregard that, in the long-term all living things - us included - lose out. The great American forester and conservationist Aldo Leopold held similar views, saying that something is right when it tends 'to preserve the integrity, stability, and beauty of the biotic community' and 'wrong when it tends otherwise'.

What has been happening in the Mackenzie, and what continues to be proposed, is not progressive, but the converse. It is destructive and damaging to the earth. It sows the kinds of disharmony that is unhealthy to all living things, humans included.

Those responsible for deciding what we do here must insist that we adopt what Leopold termed 'a land ethic' that properly and fully respects nature in all its wondrous diversity. A look around the Mackenzie today is proof that many of the changes have been made by people who have very narrow definitions of 'progress' and 'growth'. So much of what is done in the name of 'development' is destructive. That this should continue to be occurring and promoted in this day and age, is irresponsible and utterly wrong. It's time we took notice of the truth in Berry's remark that 'all good farmers are conservationists, and all farmers ought to be'. It would be true to say, here, that too few people everywhere are, when it comes to their relationship with nature, behaving as they 'ought' to.

I recommend that those charged with determining the sort of management appropriate to dry lands read the essays of the American writer, the late Edward Abbey. And, recently, the review essay 'Dry Lands' by Rebecca Solnit where she discusses James Lawrence Powell's new book, *Dead Pool: Lake Powell, Global Warming and the Future of Water in the West*. Solnit's essay is to be found in the *London Review of Books*, 3 December 2009.

Yours sincerely,

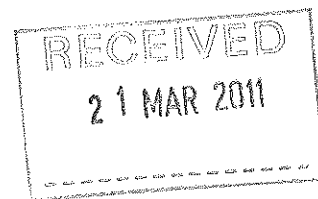
Brian Turner  
Main Road  
Oturehua  
Central Otago 9339

1 March 2011.

21/3/11

125051

Rhiannon McKenzie-Smit  
15 Newall Avenue  
Christchurch 8052



The Commissioner of Crown Lands  
C/- Mr T Sharpe  
PO Box 142  
CHRISTCHURCH

February 21 2011

The Wolds Tenure Review

Dear Mr Sharpe,

I am writing in favour of Tenure Review for The Wolds Station.. I have spent most of my life with Lake Tekapo as a second home, having holidayed at my family's cottage in the village every year for over 45 years (with the exception of a period of 11 years when I lived overseas). The Mackenzie is a very special place to me and my family, and over my life time I have come to value the efforts of the local farmers to farm within the constraints of the environment and thus conserve the beauty of the place.

It is, however, obvious, that for family farms to survive in a new era, there will need to be tenure review, there has to be access to irrigation on the flatter land to provide winter feed for farmers to have an economically viable unit. If we all want to enjoy this unique environment we should as a community respect the people that live and work in the area. The local farmers have their livelihood dependent on making the right decisions and working within the framework of a geographically, geologically, climatically challenging area, which can produce, when well looked after the agricultural products that New Zealand needs to produce for all our economic survival.

I am not sure if the average urban New Zealander has any conception of the daily grind of farming- of the huge challenges of pest and weed control, and the vagaries of the primary product market place. If we want the land to be conserved and best looked after into the future, then it is vital that families such as John Murray's are able to maintain a financially viable unit. I have spent time walking, tramping, fishing, boating and kayaking on much of the farm land and waterways around the Tekapo area, my family have never been denied access to the recreational opportunities that exist, we do however, always ring and ask for permission, a common courtesy that urban dwellers would expect if people where wanting to access a stream in their garden, surely? I believe the Mackenzie has a future that can cater for everyone's needs and tenure review is part of that equation. To that end, I am completely in favour of The Wolds' Tenure Review.

Kind regards

Rhiannon McKenzie-Smit.



125052

## Tony Sharpe

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**From:** H Frank [itod03@paradise.net.nz]  
**Sent:** Sunday, 27 March 2011 5:11 p.m.  
**To:** Tony Sharpe  
**Subject:** Fw: Wolds pastoral lease  
**Attachments:** Submission Wolds .doc

Hello  
Just resending the email in case it got lost.  
H Frank

----- Original Message -----

**From:** H Frank  
**To:** [tony.sharpe@darroch.co.nz](mailto:tony.sharpe@darroch.co.nz)  
**Sent:** Monday, February 28, 2011 7:17 PM  
**Subject:** Wolds pastoral lease

Dear Mr Sharpe  
Attached find my submission on the preliminary tenure review proposal for the Wolds pastoral lease.  
Yours sincerely  
Hermann Frank

**Hermann Frank  
69 Fairview Road, RD 2  
Timaru 7972  
New Zealand**

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Phone/ Fax 0064 3 684 5399  
e-mail: itod03@paradise.net.nz

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26 February 2011

Darroch Ltd  
Attn Tony Sharpe  
PO Box 143  
Christchurch

Re Submission on preliminary tenure review proposal for the Wolds pastoral lease

This submission requests the Preliminary Proposal for the Wolds be withdrawn, because it fails to implement the Crown Pastoral Lands Act (CPLA) 1998.

The Proposal is totally unbalanced and fails to protect the areas of having significant natural values that warrant protection as public conservation land under the objectives of Part 2 of the CPLA. These areas include the whole of the Maryburn wetland and catchment, the Paterson Ponds, the western slopes and the southeast face of the Mary Range, parts of the Tekapo River terraces and further outwash terraces and plains. A conservation covenant for 5 ha of boulderfields is not sufficient for the protection and management of that area. Any areas transferred to freeholding are in danger of developments which would degrade or destroy their values as has happened in other parts of the Mackenzie Basin.

Also, the Proposal fails to provide secure public access to all areas restored to Crown ownership and to areas of the Mary Range with extensive views.

The Proposal should be withdrawn and renegotiated to ensure the full protection of areas identified by experts as having significant natural values and to ensure full public access to all these areas and other areas of high public interest. For substantial parts of the freeholded land a sustainable management covenant is necessary to retain their ecological and landscape values.

However, the renegotiation should be put on hold until a final plan for the whole of the Mackenzie Basin by the Government in consultation with a wide range of groups has been agreed upon. A new proposal would need to be renotified.

Yours sincerely

125 053

Darroch Ltd  
P.O.Box 142  
Christchurch 8140

28.02.11  
Attn: Tony Sharpe  
tony.sharpe@darroch.co.nz

**Submission on the Preliminary Proposal  
for Review of Tenure  
The Wolds Pastoral Lease  
under Section 43 Crown Pastoral Lease Act 1998**

This is a personal submission on the Review of Tenure of The Wolds Pastoral Lease from Fraser B. Ross of 29a Nile St, Timaru 7910..

**Preliminary Proposal summary:**

I understand the preliminary proposal for the 7,934ha. The Wolds Pastoral Lease to be:

a) Restoration of 760ha. to full Crown ownership and control being:

Tekapo River terraces - 600ha. (CA1)

Mary Range - north east toe slopes - 70ha (CA2)

Telecommunications reserve - summit of Mt Mary (no public access) - 2.4ha

Mary Burn wetland - scientific reserve - 85ha.

b) Freeholding 7,176ha. subject to a conservation covenant over a 5 ha. boulderfield on the western slopes of the Mary Range overlooking Lake Pukaki.

**My submission:**

In the past, with permission, I have visited some parts of the property, at least, and have a good appreciation of the natural and landscape values that exist there.

The Wolds contains many special natural features and values, which I feel, are significant and worthy of protection for the long term. So, I appreciate this opportunity to comment on the Preliminary Proposal for the review of The Wolds Pastoral Lease.

I am most concerned that the Preliminary Proposal does not appear to implement the legislative requirements of the Crown Pastoral Lands Act (CPLA) 1998. Because the Proposal fails to include protection for the extensive outwash plains, the greater part of the Mary Burn wetlands and catchment, parts of the Tekapo River terraces, the wider slopes of the Mary range, Paterson Ponds and the outwash terraces on the unoccupied Crown Land. Which have been identified by expert scientists, and the staff of the Department of Conservation, as having significant values that fully warrant protection as public conservation land under the objectives of Part 2 of the CPLA.

And, also I am most disturbed to see that the Proposal does not provide secure foot access

to several areas, including the crest of the Mary Range and Mt Mary itself, for the public to use and to enjoy the extensive views available from that up-lifted area.

I feel, most strongly, that the Proposal should be renegotiated so to ensure the protection of the Significant Inherent Values, which have been mentioned above, and omitted for protection in the Preliminary Proposal. When renegotiated any new proposals should be re-notified and then opened again for full public input by way of submissions.

**The specific aspects of the proposed Preliminary Proposal that I feel do not meet the statutory objectives of the Crown Pastoral Lands Act include:**

1. The intention in the Preliminary Proposal is to freehold most of the important Mary Burn wetland and catchment, and the Mary Burn Stream itself. This is totally unacceptable and not consistent with the objectives of the CPLA, because this area contains highly significant values associated with the wetlands, the streams, the shrubby moraines and short tussock grasslands. This area is an important habitat for several threatened species as well. So, in order to comply more fully with the objects of the CPLA **I ask that the whole of the 765ha, as sought by DoC, and the Mary Burn Stream and its shrublands, be retained or restored to full crown control and protected as public conservation lands.** This area of land be added as an extension to the proposed Scientific Reserve to ensure that the inherent values, overall, are protected for the long term.
2. Regarding the proposed freeholding of the western slopes of Mount Mary Range, overlooking Lake Pukaki, this area contains landscapes, which are considered to be outstanding. As well, in this area there are wetland ecosystems, which are nationally rare and important. And also, there are dry-land native vegetation and shrublands, which are significant remnants of what once existed in that area before the arrival of humans to our country. This area is also part of the largest and most intact sequence of lateral moraine glacial landforms and associated dry-land habitats and plant communities remaining in all of the Mackenzie Basin. So, **I ask that this area, with its significant inherent values, be protected as public conservation land and so fulfill better the objectives of the CPLA.**

NB: wilding trees have established widely over some of this area at least, because they have not been controlled as required, I understand, by the terms of the lease on this property. So if, or when, this land is protected as Conservation Land, as I have asked for, then DOC should be sufficiently funded to control the ever increasing spread of wilding trees on this part of The Wolds Pastoral Lease.

3. Regarding the proposed freeholding of the Southeast Face of the Mary Range, this highly visible area of steeper slopes has been relatively unmodified with near natural intact landscapes and vegetation cover of short tussock grasslands and shrublands. And, I understand, this area is an important habitat for large populations of the common gecko and skinks, which are becoming much less common elsewhere. If freeholded there would

be no certainty that these special inherent values will be protected and maintained intact for the long term. So, **I ask that this area be retained by the Crown and protected as public Conservation Land.**

4. Regarding the proposal to freehold part of the Tekapo River Terraces, these undeveloped terraces have been identified by the Department of Conservation as having significant inherent natural values, including habitats for special threatened plants, geckos and skinks, and birdlife. So, **I ask that these Tekapo River Terraces be retained by the Crown and added to the adjacent CA1 area proposed as a Conservation Area.**

5. Regarding the proposed freeholding of the Outwash Plain, east of the Mary Range and to the North Eastern Triangle of Unoccupied Crown Land, this area contains important conservation and landscape values, which could be threatened by development if the land was freeholded. As well as having significant inherent values, the highly visible landscapes are close to SH8, which is a major tourist route for both local and international tourists. So, **I ask that this area be retained by the Crown, and be protected as a Conservation Area, at least.**

6. The proposal to freehold extensive areas on The Wolds, will result in the probable loss of important wetlands, short tussock grasslands, shrublands and other natural values. And could also result in the possible loss of ionic landscapes for which the Mackenzie Basin is renown. By including all these inherent natural values and associated landscapes, in the Conservation estate, would ensure the objectives of the CPLA are complied with more fully. So, **I ask that all these inherent values be retained in Crown ownership and become part of the Conservation estate.**

**Access:** this Preliminary Proposal is deficient in provisions for public access to parts of the property that are intended to be retained in public ownership, or should be retained in public ownership. Secure public access should be available to Mt Mary which is an important recreational route because it affords outstanding wide-ranging scenic views that can be seen from that vantage point. And there should be provision, if limited, to "CC1" and also to "R" Scientific for interested members of the public to visit these areas. So, **I ask that secure public access, to Mount Mary, be made available from SH8 as well as public access from the Tekapo Canal along the existing farm track that is routed on The Wolds property. And some access provisions should be made available to interested members of the public, to visit "CC1" and "R" Scientific.** And, if my request for more areas on the property be retained in Crown ownership as public Conservation Land is accepted, then public access should also be available to those additional areas as well.

**In conclusion:** I feel that the Preliminary Proposal fails to meet the objectives of the Crown Pastoral Lease Act, on several aspects as mentioned in my submission. So, I ask that the Proposal be withdrawn and held in abeyance, at least until the wider considerations on possible future direction for the greater Mackenzie Basin have taken place. And, after that consultation process has been worked through and appropriate

decisions made only then should this Review of Tenure be re-considered for negotiation. And when renegotiated the public should then be given the opportunity to submit again on any revised Preliminary Proposal for The Wolds Pastoral Lease. So, **I ask that the public be given the opportunity to submit again on any revised proposal for this property.**

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Fraser Ross', written in dark ink.

Fraser B. Ross  
29a Nile St  
Timaru 7910

Ph: 03 6843382

Email: [fraserross@clear.net.nz](mailto:fraserross@clear.net.nz)

125054

## Tony Sharpe

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**From:** Jennifer Miller [J.Miller@forestandbird.org.nz]  
**Sent:** Monday, 4 April 2011 4:04 p.m.  
**To:** Tony Sharpe  
**Cc:** Sue Maturin  
**Subject:** TR Preliminary Proposals Maryburn and The Wolds  
**Attachments:** image001.jpg; Maryburn submission final.doc; TR submission The Wolds final.doc

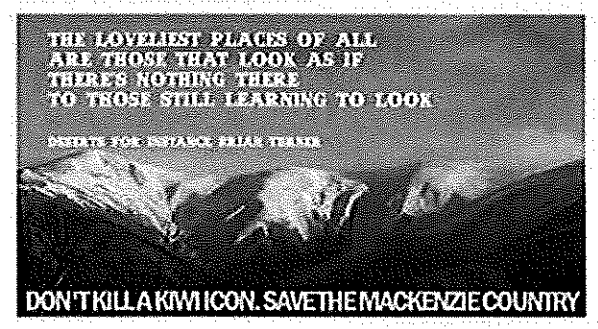
Dear Tony

Please find **attached** submissions on the preliminary proposals for Maryburn and The Wolds on behalf of Royal Forest and Bird Protection Society of New Zealand.

This is a late submission however it is considered that there will be no parties prejudiced by this.

Photo attachments will follow and a hard copy of these submissions will be posted to you.

Jen Miller Canterbury West Coast Field Officer  
Royal Forest and Bird Protection Society of New Zealand  
PO Box 2516, Christchurch  
DD 03 366 0655 M 021 651 778 F 03 365 0788  
[www.forestandbird.org.nz](http://www.forestandbird.org.nz)



31 March 2011

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

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

**A. INTRODUCTION**

The Royal Forest and Bird Protection Society (Forest and Bird) is New Zealand's oldest and most active conservation organisation. Formed in 1923 the Society has around 36,000 members in 56 branches around New Zealand. This submission is on behalf of the Society's Central Office and national organisation. Individual branches may also make submissions.

**B. PRELIMINARY PROPOSAL**

Forest and Bird understands the preliminary proposal for the 7,934 ha. Wolds pastoral lease to be:

a) Restoration of 760 ha. to full Crown ownership and control being:

- Tekapo River terraces - 600 ha. (CA1)
- Mary Range – north east toe slopes - 70 ha. (CA2)
- Telecommunications reserve – summit of Mt Mary (no public access) – 2.4 ha.
- Mary Burn wetland - scientific reserve – 85 ha.

b) Freeholding 7,176 ha. subject to a conservation covenant over a 5 ha. boulderfield on western slopes of Mary Range overlooking Lake Pukaki.

**C. DECISIONS SOUGHT**

1. Forest and Bird submits that the preliminary proposal (PP) for The Wolds is so contrary to the requirements of the Crown Pastoral Land Act (CPLA) including its objects in Part 2, that the Crown should withdraw it and withdraw from tenure review.

If in future the Crown invites the lessee to re-enter tenure review a new preliminary proposal should be negotiated which adequately protects the significant inherent values identified in Department of Conservation reports and in this submission. Any new preliminary proposal should be renotified for public submissions.

2. All three areas below have significant inherent values (SIVs) which DoC recommended for protection, and should be restored to full Crown ownership and protection as conservation land namely:

- (i) all of hummocky moraine and the western faces of Mary Range between Lake Pukaki and the crest of the range (1,367 ha.). This would enable public access to Mt Mary and the crest of the Mary Range.
- (ii) Patersons Ponds (66 ha of adjacent unoccupied Crown land) which DoC recommended be managed by Mackenzie District Council
- (iii) The northeast triangle of outwash terrace (451 ha of unoccupied Crown land.)

3. All areas below have SIVs and should be restored to full Crown ownership and protection as conservation land namely:

- (i) All of the 765 ha. of Mary Burn wetland and catchment identified as having SIVs by the department's technical experts not just the 85 ha. reserve proposed.



- (ii) All 880 ha. of the Tekapo River terraces identified as having SIVs in the technical reports not just the 600 ha. proposed as CA1.
- 4. An easement should be created to provide public foot and mountain bike access from the Hayman Road to Mt Mary if all of the crest of the range is not protected as conservation land.
- 5. A landscape covenant should be established on the Mary Range south east face as marked on Map 1 attached and as recommended by DoC.
- 6. A sustainable management covenant should be established over the artificial pond on The Wolds where SH8 and Tekapo canal intersect. Given the huge loss of wetlands in New Zealand a covenant is required to protect the area against drainage, stock grazing and require weed control.
- 7. A renotified proposal should provide adequate funding for DoC to undertake wilding control given that LINZ has failed to enforce the "good husbandry" requirements of the lease to control wilding conifers.

#### **D. GENERAL SUBMISSION POINTS**

1. The "best use for New Zealand" in terms of Government's desired outcome for Crown pastoral lands (CAB Min (09)26/7C) would be the protection as public conservation land of the significant indigenous biodiversity, landscape, ecosystem service and other inherent values of The Wolds. This would preserve options for future generations, help implement the NZ Biodiversity Strategy and the Biodiversity Convention, and safeguard the landscapes which are the resource base for tourism and recreational outfitting industries.

The preliminary proposal does not promote "best use" because it maximises private gains for the current lessees at the expense of the public. It fails to protect representative areas of glacial outwash terraces and hills, the floor of the Mackenzie Basin and an ecological sequence from the shores of Lake Pukaki across the Mary Range to the banks of the Tekapo River.

2. Not protecting large areas with SIVs means the proposal does not implement the objects in Part 2 of the CPLA. The Department of Conservation (DoC) shares this view. In information obtained under the Official Information Act DoC's Tenure Review Manager suggested that without changes to provide better protection and public access, the proposal should be withdrawn. He noted, "The Department of Conservation believes that this tenure review is deficient in many respects and does not in my opinion meet the objectives of the CPLA".<sup>1</sup> No changes to improve the proposal have occurred.

The Tenure Review Quality Assurance Board has failed to provide the "robust checks" envisaged by Government (CAB Min (09) 27/7C at para. 21) because it has allowed the proposal to be notified.

3. By freeholding all land close to and overlooking Lake Pukaki the proposal fails to maintain and protect the natural character of lakesides contrary to Government objectives (CAB Min (09)26C). The weak provisions in the Mackenzie District Plan controlling rural subdivision, cultivation and intensive stocking mean SIVs here can be easily degraded once freeholded.
4. The proposal fails to provide public access to Mt Mary, one of the prominent landmarks in the Mackenzie Basin. Public access should be provided and the crest of the range protected

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<sup>1</sup> Letter from Mike Clare, Manager High Country Tenure Review, DoC, to Pat Curry TR Consultant, Darroch Valuations 29 January 2010.

because of the Mary Range's high ecological, landscape and recreational SIVs. Mt Mary and the range is visible from long stretches of SH 8 and scenic viewing points around Lake Pukaki. At 995 m Mt Mary is one of the few landforms which rises above the surface of the surrounding outwash plains and terraces. It has panoramic views over Lake Pukaki and the Basin and is close to SH 8. DoC identifies Mt Mary as "an attractive destination for the public".

More than 900,000 tourists pass through or stop in the Basin each year. Protecting Mt Mary and the slopes and crest of the range as conservation land would enable public access and the establishment of a highly scenic walking and mountain biking track. This may encourage longer visitor stays.

The hill country land is unsuitable for pastoral intensification.<sup>2</sup> It has potentially much greater economic value for tourism and recreation than for grazing. It is not "best use" of reviewable land for so much of the Mary Range to be privatised denying public access and the opportunity to create a recreational and tourism asset.

Telecommunications masts and equipment co-exist with public recreational use on many other hill tops without vandalism. This is not a valid reason to deny public access from Hayman Road to Mt Mary.

5. The information provided with the notification of the preliminary proposal is incomplete, potentially misleading prospective submitters. The Conservation Resources Report (CRR) and "Values" maps on the LINZ website are dated 2004. Additional up to date information on SIVs provided by the Department its 2008 "Addendum report" on conservation resources<sup>3</sup> and associated maps are omitted. This understates SIVs and misleads submitters.

6. The status report fails to include any information on the 1992 Land Improvement Agreement for The Wolds under s30A of the Soil Conservation and Rivers Control Act. The report should identify the terms of the agreement and whether land was retired and fencing done as agreed in return for catchment board or Crown funding.

7. There is no scientific or other information in the PP to support comments that freeholding would promote ecologically sustainable management.

The proposal does not adequately consider the suite of land uses which could best promote ecologically sustainable management of reviewable land. The only land use examined is exotic forestry.<sup>4</sup> Ignoring other land uses (eg the water harvesting and other ecosystem service values of indigenous vegetation cover) inappropriately applies Part 2 CPLA.

8. The Scion report (2009) concluded that tree cover would not significantly enhance "ecological sustainability" or the "preservation of life supporting capacity" on The Wolds except for on a 700 ha. area adjacent to the Tekapo River, and a 700 ha. area on the moraine land west of the Mary Range<sup>5</sup> (both of which have high ecological and landscape SIVs which forestry would compromise). Despite this, the preliminary proposal does not restrict forestry through covenants on land proposed for freeholding.

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<sup>2</sup> Scion (2009) notes that "pastoral improvement options are least attractive" of alternative land uses on the 700 ha. of moraine surface west of the Mary Range.

<sup>3</sup> DoC (Jan. 2008) "The Wolds Pastoral Lease Recommendation Report Addendum."

<sup>4</sup> Scion (2009)

<sup>5</sup> Scion (2009) section 5 Conclusions (Pages not numbered)

9. The Preliminary Proposal constitutes a very poor return to the Crown and taxpayers with the small, scattered areas to be protected requiring 13.5 kms of new fencing likely to cost thousands of dollars paid for by the Crown.

10. Forest and Bird increasingly believes the tenure review process lacks transparency, does not address potential conflicts of interests and has inadequate quality assurance mechanisms. There is a significant conflict of interest in having the same external contractor (generally a real estate and valuation companies with no commitment to safeguarding the public interest or SIVs related expertise) negotiate the preliminary proposal with the leaseholder and then receive and evaluate public submissions and make recommendations on whether submission points should be accepted or declined.

Amending the preliminary proposal to better protect SIVs in response to submissions for example, would potentially involve contractors such as Darroch Ltd resiling from their position in earlier negotiations with leaseholders. There is a strong incentive for the contractor to avoid loss of face or changes which "rock the boat" by declining any submission points which seek to increase the areas protected.

As an opportunity for public consultation on the future of Crown land, the tenure review submission process has become a farce. Most submission points are rejected. There are few, if any, significant changes to preliminary proposals regardless of the ecological and recreational information presented by submitters' and their analysis of the interpretation and implementation of the CPLA.

#### **E. SPECIFIC SUBMISSION POINTS ON AREAS WITH SIVS WHICH MERIT RESTORATION TO FULL CROWN OWNERSHIP AND PROTECTION AS CONSERVATION LAND**

##### **1. Lake Pukaki – western slopes Mary Range**

The PP proposes freeholding all of the western slopes of the Mary Range on the Wolds overlooking Lake Pukaki with only a 5 ha. conservation covenant over a boulderfield and no public access to Mt Mary. All 1,367 ha on the rolling hummocky moraine between Lake Pukaki and the Mary Range and the western slopes of the range to its crest identified by DoC as having SIVs meriting protection<sup>6</sup> should become conservation land.

The transfer of an isolated 2.4 ha. "Telecommunications" area on the summit of Mt Mary, where a television repeater is sited, is inadequate to protect the habitat of two notable beetle species.

##### Significant inherent values deserving protection include:

- An important part of the glacial landscape around the south east corner of Lake Pukaki and the visual setting for the lake.
- 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<sup>7</sup> As such the area is critical to establishing the Mackenzie dryland park.
- Would protect a continuous sequence of significant ecosystems extending from Lake Pukaki to the crest of the Mary Range. These ecosystems include: lowland hill country shrubland, alluvial terrace shrubland, dryland shrubland, stony fans and terraces associated with outwash

<sup>6</sup> DoC (Jan. 2008) "The Wolds Pastoral Lease Recommendation Report Addendum"

<sup>7</sup> Head N (2007) "Botanical Survey Pukaki Lateral Moraine- The Wolds," Unpublished DoC report.

plain, kettleholes and ephemeral tarns with turf communities. Protecting a landscape and ecotone sequence helps ecological functioning and long term sustainability.

- The rolling hummocky moraines are part of a geopreservation site with national significance for its scientific and education values.<sup>8</sup> Other visually striking landscape features include moraine “dumps”, moraine ridge patterns and meltwater channels.
- Mary Range is a distinctive and conspicuous natural feature. It is part of the backdrop to Lake Pukaki and the visual corridor for State Highway 8, can be seen from many points on SH 8, the Pukaki-Tekapo canal road (Hayman Rd) and the Mount Cook road (SH 80).
- Significant recreational potential with easy access from SH 8 and panoramic views from Mt Mary. The area is part of the corridor for the Te Araroa Trail which uses the margins of Lake Pukaki .
- Ephemeral and kettlehole wetlands are nationally rare ecosystems and the have good native species diversity.
- Shrublands of matagouri, small leaved coprosmas, mountain wineberry, porcupine shrub, climbers and other species are in good condition. They are remnants of pre-human vegetation cover (protected from burning and grazing by rocks), appear vigorous, and are potentially a significant carbon sink<sup>9</sup>.
- Provides habitat for several threatened species including a dwarf broom, coral broom, a bidibid and a mat daisy.
- Fescue tussocklands have high native species diversity with native daphne, mat coprosma, blue tussock, and a white sun orchid present.
- An extensive area of glacial erratic boulders and rock piles with largely intact indigenous shrubland is a refugia for many invertebrates including diverse beetle fauna, and a threatened grasshopper. Entomologists assessed it as providing “outstanding” habitat for invertebrates.
- The boulderfield communities are habitat for Southern Alps gecko.<sup>10</sup>
- Two notable beetle species (a rare undescribed endemic ground beetle and a darkling beetle) have been recorded near the summit of Mt Mary in modified tussockland with scattered rock outcrops. A small, isolated “telecommunications” reserve does not implement sound reserve design.

LINZ’s failure to ensure the lessees meet their good husbandry requirements to keep the land clear of pests and weeds and the resulting spread of wilding conifers close to Lake Pukaki does not justify freeholding. DoC states, *“it is a travesty that the tree problem has been allowed to escalate to a point where it is almost uncontrollable.”*<sup>11</sup>

A renegotiated preliminary proposal should include adequate funding to allow DoC to undertake comprehensive wilding control.

## 2. Mary Burn wetland

LINZ only proposes to protect 85 ha of the wetland as a scientific reserve, not the 765 ha. area with high SIVs sought by DoC as conservation land. This includes the least modified part of the wetland, associated spring fed streams, and a buffer of shrubby moraines and modified grassland to the north and west.

The preliminary proposal would create a fragmented postage stamp reserve. Cattle grazing has already modified some plant communities and trampled and pugged watercourse margins and natural hollows.<sup>12</sup> Continued farm management of surrounding land with grazing, over-sowing,

<sup>8</sup> Heyward and Kenny, 1993.

<sup>9</sup> Head N (2007?)

<sup>10</sup> Sedgely J (February 2004)

<sup>11</sup> Letter from Mike Clare, DoC to Pat Curry TR Consultant, Darroch Valuations 29 January 2010

<sup>12</sup> DoC (June 2004) Conservation Resources Report at p7

fertilising and weed spread risks dessication and incremental loss of the wetland. This would not promote ecologically sustainable management nor constitute best use given extensive loss of wetlands in New Zealand.

All 765 ha. of the wetland and its catchment need to be protected to ensure its long term viability and connect with land proposed for protection on the adjacent Irishman's Creek lease.

Significant inherent values deserving protection include:

- The Mary Burn wetland is the largest and best moraine-dammed wetland system in the Mackenzie Ecological Region<sup>13</sup>. It is a relic swamp, one of the few remaining in the Basin.
- It lies in a broad moraine depression and has "*a mosaic of small inter-connected freshwater environments.*"<sup>14</sup> These include spring fed streams and pools, larger stream (Mary Burn), open ponds with muddy banks, ephemeral ponds, slow moving streams and boggy sedgeland.<sup>15</sup>
- The larger 765 ha. area provides a wide range of micro-habitats for wetland plants, including sedgeland, reedland, tussockland and shrubland. The northern part is dominated by *Schoenus pauciflorus* tussockland and spongy *Carex diandra* sedgeland. The southern portion is more modified by stock with *Schoenus pauciflorus* tussockland, silver tussock, fescue tussock and small sedges.
- The wetland was identified as a RAP Tekapo 8 (Wolds Stream) deserving protection in the Protected Natural Area Programme 1984, partly because of its size and extent, and is a Site of Natural Significance in the Mackenzie District Plan.
- Small spring fed streams support bignose galaxias, a recently described, threatened fish species which is only known from 13 other sites in New Zealand. (2004). This small stream habitat needs protection to ensure the viability of the species.
- Freshwater mussel, an uncommon species occur in the Mary Burn. This, the frequent finding of bignose galaxias and the diversity of habitats and its representativeness contribute to the wetland being "*of high significance*"<sup>16</sup> as an aquatic habitat in the wider Basin.
- The area is not impacted by introduced fish because the small streams limit trout spread.
- The Mary Burn swamp is rated as a Site of Special Wildlife Interest of high wildlife value supporting waterfowl and tern species.<sup>17</sup>
- Nine threatened bird species have been recorded including black stilt, Australasian bittern, marsh crake, black billed gull, grey duck, banded dotterel, black billed gull, NZ falcon, and black fronted tern, and three threatened plant species including a coprosma and olearia.
- The shallow depressions and wetland turfs provide habitat for flocking of banded dotterels post breeding.
- Provides a wide variety of distinct habitats for invertebrates.

### 3. Mary Burn stream

DoC's specialist botanical field survey report<sup>18</sup> recommended the full length of Mary Burn within the lease be protected as conservation land. The department's aquatic habitat field survey report identified all of the stream as having aquatic values. Forest and Bird believes the length of the stream downstream of Mary Burn wetland has SIVs deserving protection to retain connectivity with the wetland and allow movement of indigenous fish, and protect existing high water quality and riparian shrublands.

<sup>13</sup> Partridge and Molloy (1986).

<sup>14</sup> Bowie S (February 2004)

<sup>15</sup> Emberson R and Syrett P (January 2004)

<sup>16</sup> Bowie S (February 2004)

<sup>17</sup> Jarman (1987)

<sup>18</sup> Walls G (2004)

#### 4. Outwash plain east of base of Mary Range and between it and State Highway 8.

The specialist landscape and botanical reports identify this area of outwash plain as having significant values deserving protection<sup>19</sup>. The Department's Recommendations and proposed Designations Report (June 2004), however, did not recommend protection. Since then conversion of Basin floor habitats to irrigated pasture with destruction of their biodiversity and landscape values and additional ecological assessment has highlighted the importance of the extreme habitats of the dry outwash plains and their significance for threatened plants and invertebrates.

Freeholding this area would make vulnerable to shelter belt planting, further land use intensification, unsympathetic location and design of buildings given weak district plan provisions, and further wilding spread given lack of any wilding rules in the Regional Pest Management Strategy. This areas merits conservation land status.

##### Significant inherent values deserving protection include:

- The area clearly expresses the glacial processes which formed the Mackenzie basin and is part of the expansive views available from SH 8. Deserves protection as part of a scenic corridor for the highway. It has high landscape values because of the strong sense of naturalness and spaciousness with distant views to the hills, and strong cohesiveness with relatively uniform vegetation cover.<sup>20</sup>
- Distinctive glacial natural feature (sub-unit 2A on the landscape map) comprising a hummocky line of irregular mounds of glacial material studded with large erratic boulders. These are obvious from SH8 which runs parallel to it.
- Vegetation cover on much of the outwash plain is depleted but provides habitat for specialised indigenous species which occupy these extreme habitats e.g. *Carmichaelia nana*, *Luzula rufa* var. *albicomans*.
- Modified and depleted ecosystems need protection to prevent the extinction of unique native species that only survive in these ecosystems.<sup>21</sup> Threatened environments such as this support a disproportionately large proportion of New Zealand's most seriously threatened species, habitats and ecosystems.
- The landforms, land environments and associated habitats are poorly represented in the national reserves network.
- The Mary Burn stream extends for several kms south of the wetland. It has continuous mature indigenous riparian scrub of matagouri, *Coprosma propinqua* and porcupine shrub with *Hebe odorata*, and toetoe and golden speargrass on the banks. The area is recommended for protection in the specialist botanical survey report.<sup>22</sup>

#### 5. Tekapo River terraces

The preliminary proposal only proposes protection of 600 ha. (CA1) as conservation land. DoC sought protection of 888 ha. of the broad low terraces along the Tekapo River on the eastern side of the property. This larger area has SIVs requiring protection.

##### Significant inherent values deserving protection include:

- Highly distinctive landscape representative of the Mackenzie Basin which is visible from the canal road and has high scenic and aesthetic qualities.
- "Excellent example" of recent outwash terraces in a relatively unmodified state (some impact from past burning and grazing but no cultivation).

<sup>19</sup> DoC (29 April 2004) "The Wolds Values Map"

<sup>20</sup> The specialist landscape report recommended formal protection for a "meaningful tract of outwash plains" (Landscape Unit 2) and some form of protection e.g. a covenant for mounds and glacial erratics (Landscape Sub-Unit 2).

<sup>21</sup> Walker S et al (2006)

<sup>22</sup> Walls G (January 2004) at p5

- The “plant communities and animal habitats are highly representative of those originally present on terrace surfaces in the ecological district.”<sup>23</sup> Undeveloped terrace communities are a relatively uncommon ecosystem type in the high country. The vegetation on the lower terrace is relatively intact with minor invasion of mouse-ear hieracium.
- Would preserve several distinct communities of sparse grassland and mat vegetation which provide habitat to a distinctive insect fauna including the largest known populations of the robust grasshopper, and a localised darkling beetle.
- The larger area is important for long term viability and providing a buffer between more intensively managed proposed freehold.
- Provides a corridor of relatively intact terrace habitat to complement important fauna habitat in the river.
- The series of terraces support a high diversity of plant species including five threatened plant species, among them a threatened broom and a convolvulus.
- Rates “highly” in terms of the representativeness for lizards with seven species recorded.<sup>24</sup>
- Habitat for threatened species including four threatened four lizard species (jewelled gecko, green skink, spotted skink, and long-toed skink), three grasshoppers (robust grasshopper, *Sigaus minutus* and *S. minutus* “blue”) and three bird species (black billed gull, black fronted tern, and banded dotterel) all threatened with extinction. It is an important breeding habitat for banded dotterel.

#### 6. Patersons Ponds

LINZ’s preliminary proposal fails to protect a 66 ha. area in the north east part of the property between Tekapo Canal and the Tekapo River which DoC proposed as conservation area to be managed by the Mackenzie District Council. A series of artificial ponds on a low terrace beside the river includes a mosaic of open water and swamp with relatively large areas of raupo, sedge, rushes and planted exotics around the margins. Encroachment of willows, poplars and alder are a threat. Conservation land status and management by Council should ensure weeds are controlled and would enhance the pond’s wetland and recreational values.

#### Significant inherent values deserving protection include:

- Ponds and surrounding areas while largely artificial (developed by MOWD as wetland/waterfowl habitat during Upper Waitaki project) support some plant and animal habitats similar to those which would originally have been present in area.
- Includes a raupo reedland which is rare in the Mackenzie Basin.
- Provides important habitat for Australasian bittern and marsh crake. Threatened species such as grey duck, black shag, black billed gull and black fronted tern also occur.
- Is part of the Tekapo riverbed Site of Natural Significance in Mackenzie District Plan
- Provides good opportunities for water based recreation, picnicing and bird watching as an “oasis” in a dry landscape. Ponds are open to the public and have a vehicle track alongside. Freeholding is likely to restrict public access.
- The ponds are stocked with rainbow and brown trout and Fish and Game says they are well used by hunters and anglers.<sup>25</sup>

#### 7. Northeast Triangle – Unoccupied Crown land

The preliminary proposals ignores a 451 ha triangular shaped block of outwash terrace north of the Tekapo canal on unoccupied Crown land (UCL) adjacent to The Wolds lease. The Wolds tenure review is a cost effective and practicable opportunity to change the status of this area of

<sup>23</sup> DoC (June 2004) “The Wolds Proposed Designation Report”

<sup>24</sup> Sedgeley J (February 2004) at p6

<sup>25</sup> Letter (17 July 2002) Vaughan Lynn Central South Island Fish and Game to Barry Dench, QV Valuations

UCL. It includes two ephemeral tarns, modified fescue tussock grassland, with scattered matagouri and stonefield.

Significant inherent values include:

- Area has had stock and rabbits excluded for 30 years and has not been oversown or topdressed. It has a smaller proportion of exotic plants than elsewhere.
- The naturalness of the vegetation and landform contribute to the integrity of the landscape and it has scenic qualities (even if these are not readily seen from public areas).
- It has good quality fescue tussock grassland, now rare in the Mackenzie Basin.
- It contains the first, and in 2004 the only, site where moa remains have been identified in the Mackenzie Basin. Moa bones and gizzard stones were discovered in bank near north west ephemeral pond.<sup>26</sup>
- It supports unusually diverse insect fauna with a high number of individuals. The disturbed gravel surface of a track is prime habitat for the nationally endangered robust grasshopper. Ground weta present.
- The pond within the area is probably an important site for insect aestivation or summer dormancy. Insect conservation requires the preservation of habitat through all life cycle phases including dormancy.
- The two tarns retain many of their characteristic features, despite past modification. They provide important habitat and diversity for aquatic macro-invertebrates not otherwise represented in the pastoral lease.<sup>27</sup>
- The area is relatively large and well defined and is well buffered though threatened by spread of woody weeds.

## **F. SUSTAINABLE MANAGEMENT COVENANTS REQUIRED**

### **1. Artificial pond on The Wolds where SH8 and Tekapo canal intersect**

This pond and associated swampland are traversed by a small stream. The pond and upper part of swamp are fenced from stock. The pond is fringed by sedges and rushes with a mosaic of indigenous shrubland beyond. Threatened plants include *Coprosma intertexta*, and *Olearia bullata*. Sedgeland includes swamp speargrass and golden speargrass.<sup>28</sup> Russell lupins, willow and some monkey musk are present.

Given the huge loss of wetlands in New Zealand a sustainable management covenant to protect the area against drainage, stock grazing and require weed control is required.

### **2. Southeast face Mary Range (Landscape covenant)**

All of the south east faces of the Mary Range are proposed for freeholding with no landscape covenant over 311 ha. A covenant was sought by DoC to restrict the building of structures, tree planting and earthworks or other soil disturbance. Given the inadequate provisions in the Mackenzie District Plan and Council's failure to enforce existing rules a covenant is required to safeguard landscape values.

Significant inherent values deserving protection by a sustainable management covenant include:

- Visible from State Highway 8 which is used by a large number of tour buses and campervans each day.
- Includes visually prominent hill slopes and summit ridge of the Mary Range. These landforms are unmodified, highly legible and distinctive. At present, the landscapes are relatively unspoilt by fencing, tracking, tree planting or intensive pasture development. They are a memorable part of the State Highway 8 corridor

<sup>26</sup> Walls G (January 2004).

<sup>27</sup> Bowie S (February 2004)

<sup>28</sup> Walls G (January 2004) at p 6



- Vegetation cover is degraded fescue tussock grasslands and scattered native shrublands.

#### **G. MORE INFORMATION REQUIRED**

##### **Northeast Mary Range – Proposed Conservation Area 2 (CA 2)**

The map in the preliminary proposal appears to protect all of the shrubland and rockland sought by DoC as conservation land CA2. However the area (ha.) figures do not tally with the extent of the area DoC wanted protected.

Forest and Bird supports the protection of land with CA2 (though believes the boundaries should be significantly enlarged) provided CA2 includes a 71 ha. extension sought in 2008.<sup>29</sup> The grey shrublands include prostrate kowhai, *Olearia odorata*, *Coprosma propinqua* and *C. virescens*. They are “*the best remaining example of a shrubland ecosystem characteristic of hot, dry, rocky sites and once widespread in the [Mackenzie] ecological region, but now uncommon.*”<sup>30</sup>

The area has large populations of common/McCann’s skink.<sup>31</sup> It is part of Pukaki RAP 13 Mt Mary.

#### **APPENDICES**

Map 1                      Additional areas with SIVs deserving protection as conservation land

#### **REFERENCES**

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<sup>29</sup> DoC (Jan. 2008) “The Wolds Pastoral Lease Recommendation Report Addendum” at p 2-

<sup>30</sup> Walls G (January 2004) at p 9.

<sup>31</sup> Espie P (1984)

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Walker S., Price R, Rutledge D, Stephens R T T and Lee W G (2006) "Recent loss of indigenous cover in New Zealand" in New Zealand Journal of Ecology 30 169-177.

125055

## Tony Sharpe

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**From:** Jenny Campbell [jennycam@xtra.co.nz]  
**Sent:** Saturday, 2 April 2011 12:34 p.m.  
**To:** Tony Sharpe  
**Subject:** Submissions- Mary Burn & Wolds  
**Attachments:** Mary Burn submission march 2011.doc; Wolds submission March 2011.doc

Kia ora Tony, greetings.

Sorry I forgot to send my submissions on Thurs night! I trust it can still be accepted.

No doubt you will be busy collating all of these.

Blessings as you work, rangimarie, jenny campbell

P O B0x 71  
Mosburn 9747  
Murihiku  
03- 248- 6398  
[jennycam@xtra.co.nz](mailto:jennycam@xtra.co.nz)

Commissioner of Crown Lands  
C/ Darroch Ltd  
PO Box 143  
Christchurch  
Email: [tony.sharpe@darroch.co.nz](mailto:tony.sharpe@darroch.co.nz)  
31 March 2011

Kia ora e hoa ma.

### **Submission To: The Wolds Preliminary Proposal**

I wish to add my voice to the strong feeling of New Zealanders that we may lose our special landscapes in the Mackenzie Basin and environments there for our unique wildlife to be able to survive and thrive- a responsibility we all hold as a nation.

For this reason :-

### **The Preliminary Proposal needs to be withdrawn**

This submission requests that the Preliminary Proposal for the Wolds be withdrawn as it fails to protect the extensive outwash plains, 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 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:

#### **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.

#### **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.

### **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.

### **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.

### **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.

I am deeply concerned about the spread of wilding pines there and the subsequent loss of natural habitats for native species. I am involved in helping with the removal of wilding pines on Mid Dome in Northern Southland so know personally of their destructive effect on landscape and habitat and their potential for spreading across other landscapes.

I have spent several holidays staying here and exploring this area so know personally how special and unique this place is. I appreciate its ecological values and want to add my weight to all of the above requests. I often travel through the Mackenzie Basin and am dismayed as I see the effect of modern farming techniques on this majestic landscape, along with the spreading wilding species.

Protection and public access need to be top priorities for this area.

Yours in conservation,

Jenny Campbell, QSM

1st March 2011

168 Otipua Rd  
Timaru

To Darrock Ltd.,  
P.O. Box 143 125056  
Christchurch  
Attn. Tony Sharpe

Dear Sirs and Mr. Sharpe,

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

"Submission on preliminary  
my tenure review proposal  
for the Wolds pastoral lease"

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

Having  
lived in the Mackenzie Country

for over eight years, I cannot think that today, someone <sup>wants</sup> to change for ever that so special kind of landscape. This, in fact, has always been the characteristic of this part of the high country.

The merino sheep have to return in great numbers, the tussock, the grasses, the shrubs, the wetlands and all the threatened plants and birds have to be protected!

The future of Tourism will benefit keeping the Mackenzie Country ~~with~~ no further change.

With kindest  
refords from

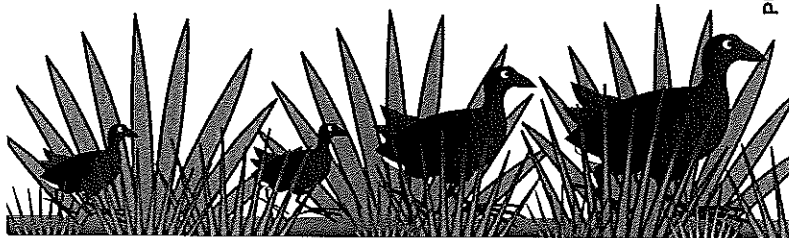
Paola Starace

Please withdraw this Preliminary Proposal for the Wolds!



Also please, do not  
privatise the Wolds!  
and never allow  
to have houses and  
buildings <sup>and parking lots</sup> (no not  
Lake Pukeriki.

Thank you. P. Stow. PUKEKO

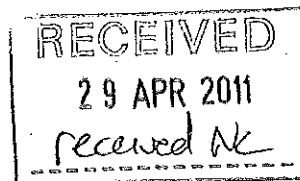




**DRAFT**

xx February 2011

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



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

**Preliminary proposal summary**

I understand the preliminary proposal for the 7,934 ha. Wolds pastoral lease to be:

a) Restoration of 760 ha. to full Crown ownership and control being:

- Tekapo River terraces - 600 ha. (CA1)
- Mary Range - north east toe slopes - 70 ha. (CA2)
- Telecommunications reserve - summit of Mt Mary (no public access) - 2.4 ha.
- Mary Burn wetland - scientific reserve - 85 ha.

b) Freeholding 7,176 ha. subject to a conservation covenant over a 5 ha. boulderfield on western slopes of Mary Range overlooking Lake Pukaki.

**Submission**

This submission requests that the Preliminary Proposal for the Wolds be withdrawn because it fails to implement the Crown Pastoral Lands Act (CPLA) 1998. 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 outwash terraces on the unoccupied Crown Land which have 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 Part 2 of the CPLA.

The proposal also fails to provide secure public access to the crest of the Mary Range to enable the public to enjoy the prominent Mackenzie Basin landmark, Mt Mary and its extensive views.

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

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

1. Proposed freeholding of most of Maryburn wetland and catchment and Maryburn Stream  
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 the whole 765 ha. area sought by DoC and Maryburn Stream and its shrublands need to be protected as public conservation land as an extension to the proposed Scientific Reserve.

2. Proposed freeholding of western slopes Mary Range overlooking Lake Pukaki  
This area contains outstanding landscapes, nationally rare wetland ecosystems and important dry land vegetation and shrublands, and remnants of pre human vegetation. 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.

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

3. 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.

4. 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

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.

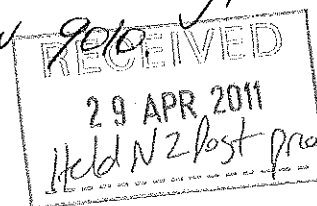
6. The extensive freeholding will not promote ecologically sustainable management. Continued grazing and pastoral intensification of wetlands, short tussock grasslands, shrublands and other communities with SIVs will degrade their healthy functioning and replace indigenous vegetation and habitats with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

Yours sincerely

125057

Darroch Ltd  
P.O. Box 143  
Christchurch  
Email: [tony.sharpe@darroch.co.nz](mailto:tony.sharpe@darroch.co.nz)

My Address: 60 Montague Street,  
North-East Valley,  
DUNEDIN 9010



Date: 20.2.11.

#### Submission to the WOLDS Preliminary Proposal

This submission requests that the Preliminary Proposal for the Wolds be withdrawn as it fails to protect the extensive outwash plains, 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 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:

#### 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 fulfill the objects of the CPLA this area needs to be protected as public conservation land as an extension to the proposed Scientific Reserve.

#### 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 fulfill 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.

#### 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.

#### 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.

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

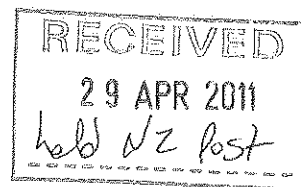
These areas contain important landscape and conservation values associated with threatened environments, habitats and species and relatively natural open, highly visible landscapes adjoining a major road and tourist route...

The Preliminary Proposal needs to be withdrawn and put on hold until a vision for the Mackenzie is agreed on.

Yours sincerely

JANET YORK  
for DM + JE York

125058



Commissioner of Crown Lands  
Darroch Ltd.  
PO Box 143  
Christchurch

Submission on

Preliminary proposals for tenure review on the Wolds and Maryburn pastoral leases in the Mackenzie Country

From: Noeline Gannaway  
Address: 83 Wright St, Mt Cook, Wellington 6021  
Ph: (04) 384-2202 Email: [noel@paradise.net.nz](mailto:noel@paradise.net.nz)

Recently advertised preliminary proposals on the two above Crown-owned pastoral leases have disturbing implications. I am writing to oppose these proposals, and ask that they be withdrawn. I do not wish to make an oral submission.

My concern is that if the land became freehold (privatised), many inherently valuable natural features would be threatened. Intensive land development such as dairying that is likely to follow would be deleterious both in terms of eroded and lost natural landscape and of pollution – nitrate pollution of soil and waterways and increased production of greenhouse gases.

I ask that the Wolds and Maryburn leases be secured as public conservation land to protect natural features of significant inherent value. These include rare kettlehole wetland ecosystems, shrubland, dryland vegetation and fescue tussock grassland within the spectacular lakeside landscapes for which the Mackenzie Basin is famous. Threatened wildlife of significant inherent value includes four species of lizard, and rare birds such as the black stilt, black-fronted tern and banded dotterel. Floodplains and alluvial terraces require protection as public conservation land.

Again, I ask that these preliminary proposals be withdrawn, and that all tenure reviews in the Mackenzie Country not proceed to public advertising until the collaborative process is complete.

Thank you for considering my concerns.

Yours sincerely

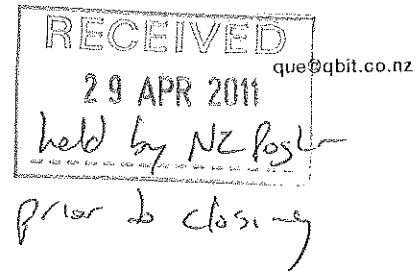
*Noeline Gannaway*

Noeline Gannaway

23-2-11

Quentin McDonald

80 HACKTHORNE RD CHRISTCHURCH, NEW ZEALAND 8022  
TEL 03 3651189



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

Re: Tenure Review of "The Wolds"

Dear Sir,

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

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

There are several areas of particular importance within the Wolds pastoral lease. The Mary range provides a spectacular backdrop to views of Lake Pukaki and, leading up to Aoraki/Mt Cook, has appeared in many visitor photographs. The western slopes are of such visual and ecological importance that they should be considered worthy of permanent protection by being added to the conservation estate. The southeast face of this range, also visible from popular tourist routes, would be appropriate for a landscape covenant to protect the visual appearance and ecology - these are a critical part of the significant inherent values of the area. At the same time public access is important, there are a number of existing tracks and public access to these should be guaranteed.

As well as these largely dryland areas there are some important wetland areas that are worthy of protection that freeholding cannot provide. The Maryburn wetland area is a critical area for native birds and fish and the full scientific reserve as proposed by DOC should be implemented. The Tekapo river terraces similarly provide an important habitat for native birds and the proposed conservation area should be extended to include them in their entirety. Finally the man-made Patterson Ponds and artificial ponds along the Tekapo canal have

high recreational and significant inherent value as habitat for native bird species.

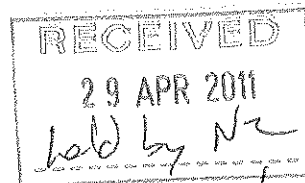
The freeholding of these areas, as currently proposed, would fail to protect these important areas and would, in my opinion, be a disaster for future recreational use, for wildlife and for the McKenzie country as a whole. We need a proposal that will instead promote the management of the reviewable land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

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Q McDonald', written in a cursive style.

Quentin McDonald

125060



*Post prior to closing date.*

February 2011

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

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

**Submission**

This submission requests that the Preliminary Proposal for the Wolds be withdrawn because it fails to implement the Crown Pastoral Lands Act (CPLA) 1998. 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. 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 Crown Pastoral Lands Act :**

- 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.
- 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.
- 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.

- 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.
- 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 Ben Woolcombe, concerned citizen.

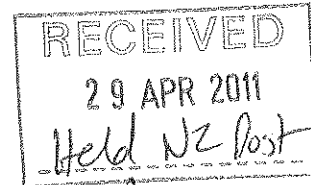
PS. The lakesides need to be preserved for everyone to enjoy, rather than by a few house and lifestyle block owners. We all know the Lake shores in Europe have been subdivided and privatised to the exclusion of the general public access. This is the inevitable outcome if the Tenure Review goes ahead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



125061

L T McLellan  
P O Box 40866  
Upper Hutt  
New Zealand  
Ph/Fax 4-5267775  
email  
lynne@letterlinks.co.nz

Darroch Ltd  
PO Box 143  
Christchurch  
Attn: Tony Sharpe  
Tony.sharpe@darroch.co.nz  
March 24 2011



prior to closing date

Dear Sir,

I would like to add my support to Forest and Bird's Voice for Nature by making the following submission.

I am aware that the government has commitments to pastoral leasees and know that measures to compensate leaseholders are necessary. However the freeholding of 90% of the Wolds pastoral lease in exchange for 10% of it going into Crown hands is in my view very short sighted. This action would penalise nature itself by removing Crown protections it currently has and more importantly it would penalise future generations of New Zealanders who will be deprived forever of this unique landscape.

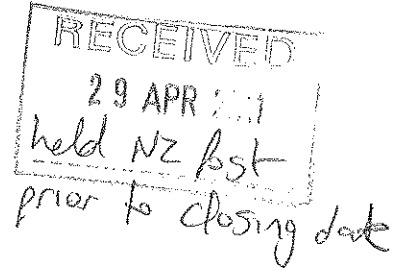
My vision is to see the creation of a drylands regional park in the remaining intact area of the MacKenzie basin which includes the Wolds pastoral lease in order to protect the area in perpetuity.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'Lynne McLellan'.

Lynne McLellan

125 062



3A North-West Arch  
Twizel 7901

26 March 2011

The Commissioner of Crown Lands  
C/- Darroch Limited  
P O Box 143  
CHRISTCHURCH

**Attention: Tony Sharpe**

Dear Tony

### **The Wolds - Public consultation**

As Twizel residents and people who love the outdoors and wide open spaces of the Mackenzie Basin we are very disappointed in the advertised outcome of the tenure review on The Wolds and Maryburn.

According to the objects of Part 2 of the Crown Pastoral Land Act, areas containing significant inherent values should be protected – either by the creation of protective mechanisms, or preferably – by the restoration of the land to full Crown ownership and control.

By our estimate approximately 5,000 ha was identified in the The Wolds Conservation Resources report (CRR) as having significant inherent value (estimate from the values map), yet only 757 ha or 10% of the property is to be protected. This is unfathomable and unexplained.

Inherent values are defined in the CPLA as values arising from cultural, ecological, historical, recreational or scientific attribute or characteristic of a natural resource, and natural resources are defined as plants and animals, air water and soil in or on which any plant or animal lives, as well as landscape and landform. Yet there is virtually no protection for any of these values. This is evident when you compare the values map in the CRR, and then match it up with the final proposals. There are a whole range of values that are not protected in the final proposals and these should be addressed for eg.

### **Maryburn or Wolds wetland**

Described on p. 13 and 14 of the Conservation Resources Report (CRR). This wetland is the largest wetland in the Mackenzie Basin and has been described as the best moraine dammed swamp in the Mackenzie Ecological Region and it was recommended that it be protected in its entirety (p. 14). Yet less than half is proposed for a Scientific Reserve. This is absolutely amazing. Wetlands are incredibly important to retain and protect. Over 90% of the country's wetlands have been destroyed and many that remain have been damaged and here is an opportunity to protect the largest and best in the Mackenzie and it has been cut in two and looking at the map only 1/3 of it is to be protected, and 2/3 will be

freeholded – this does not make any sense. Splitting an area of wetland up, protecting only part of the wetland and separating it from its catchment goes against the objects of Crown Pastoral Land Act. It is definitely not promoting “the management of reviewable land in a way that is ecologically sustainable” (s. 24 (a) (i) Crown Pastoral Land Act, and the proposal to freehold the majority of the wetland needs serious revision.

The significant inherent values of this wetland are described in the CRR. It has been identified as a RAP in the Mackenzie Ecological Region PNA survey (Espie et al 1984), a site of special wildlife interest (SSWI) (Jarman 1987) and is a Site of Natural significance (Lee 1996).

On p. 18 and 23 the fauna values of the wetland are described - The Maryburn wetland provides habitat for numerous species of native birds including a number of threatened bird species – black stilt, black-billed gull, black fronted tern, marsh crake, Australasian bittern, grey duck and New Zealand falcon.

In addition to habitat for birds, the Maryburn wetland is considered to be the most significant freshwater feature on the property (p. 23 CRR). It has a whole range of different freshwater environments and is habitat for the Mackenzie Basin endemic and threatened fish, the big-nose galaxiid. Yet, the largest part of this valuable habitat is to be freeholded.

We consider that, at the very least:

- The whole wetland its catchment and its connection to the Mary Burn should be protected and retained as a Scientific Reserve.

### **Central Moraine land**

Also on the values map there is a big area south of the wetland that is identified as having landscape and botanical values, yet there is no protection for this area and no explanation why these are not protected.

- Expert advice should be sought and options further investigated into the protection of the botanical and landscape values to the south of the wetland that are marked on the values map.

### **Western moraine land (Pukaki Moraine)/LU 5**

On the western side of the property between Mt Mary and Lake Pukaki is a series of lateral moraines which create a scenic backdrop to Lake Pukaki and have high landscape values. These landforms and landscape are continuous through The Wolds, Maryburn and Irishman Creek through to Simons Pass, and the landscape section of both the Wolds and Maryburn CRR describes this area

The Pukaki moraine is an area of rolling to hummocky moraine, running north-south in parallel bands and containing glacial erratics. Separating the hummocky moraine is a series of shallow depressions and troughs. The moraines are covered in a variety of vegetation communities including fescue tussock

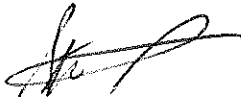
grassland, shrublands and cushionfields as well as scattered ephemeral wetlands in small kettleholes, a nationally rare and threatened ecosystem.

Only one very small part of this area has been proposed as a covenant, yet the area is described as having high landscape values due to its overall naturalness and the glacial topography and contains plant communities that are representative of the vegetation of this area. With extensive tussock grasslands being rapidly reduced in the Mackenzie Basin due to recent, and planned irrigation and development, the retention of these landscapes are really important to us as a community and we think, for all New Zealanders, that this needs to be recognised with this tenure review.

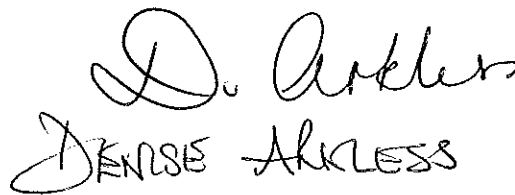
- There should be much better protection of this important landscape, and the tussock grassland communities on the western moraine land and we suggest this area is retained in Crown ownership, or the very least a conservation covenant with public access from Hayman Road to the moraine and through to Mt Mary. Along with this there should be funding provided to enable the Department of Conservation or the owner, if it is covenanted, to rid the moraines of the wilding conifers that have spread from the lakeside.

I hope you will seriously consider our comments, and we thank you for that opportunity.

Yours faithfully



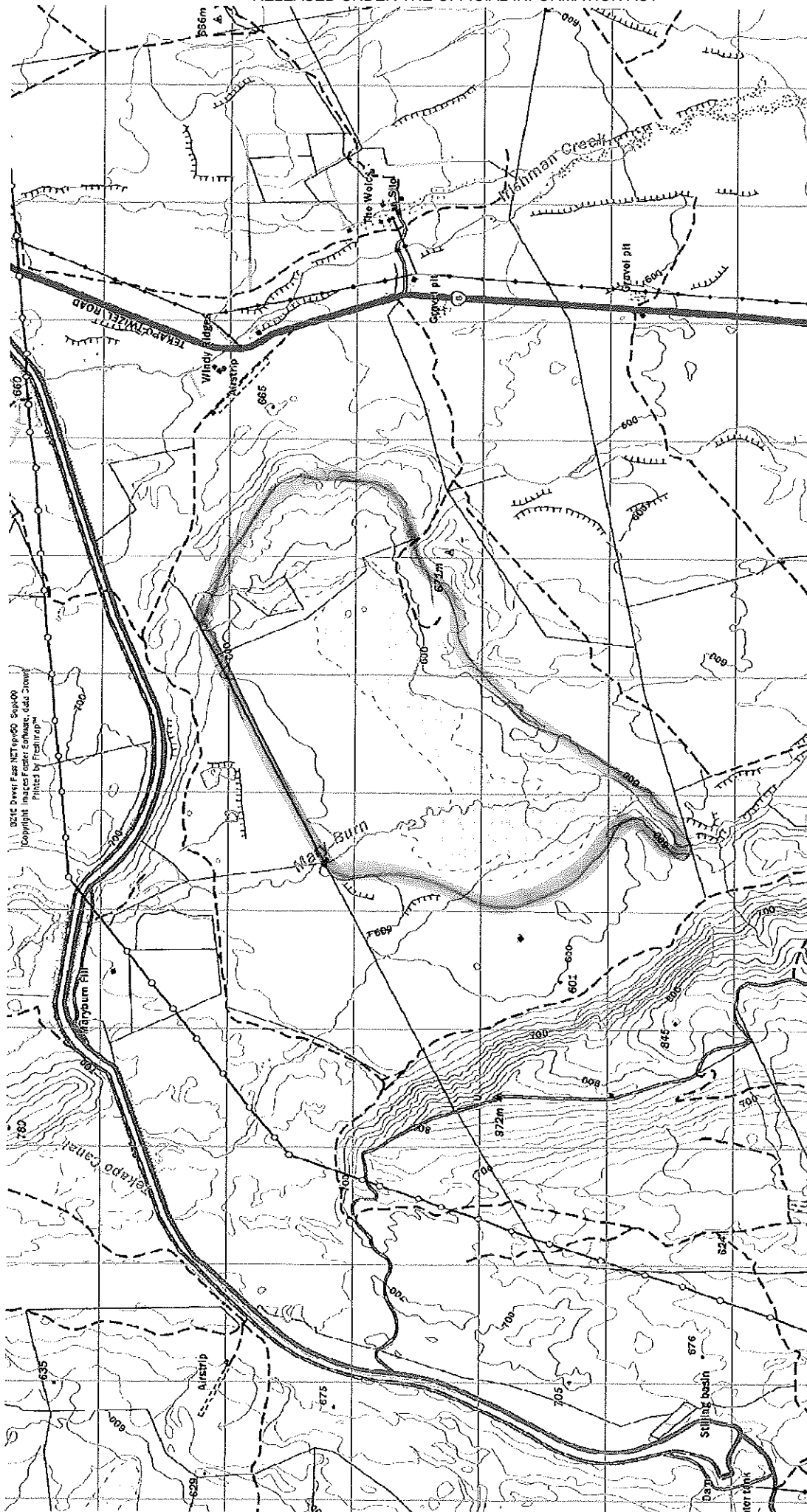
Steve Skinner



D. Arkless  
DENISE ARKLESS

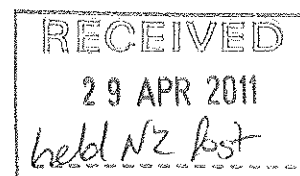
## References

See references in Conservation Resources report



The Wolds or Maryburn Wetland—to be protected in its entirety along with its immediate catchment

125063



prior to closing date

28 March 2011

Darroch Ltd  
PO Box 143  
Christchurch,

Attention: Tony Sharpe

Dear Tony,

**TENURE REVIEW – FISH AND GAME SUBMISSION ON THE WOLDS STATION**  
**PRELIMINARY PROPOSAL**

Fish and Game has reviewed the Summary of Preliminary Proposal for The Wolds Station and provide the following submission on the values associated with property and the outcomes sought through the Tenure Review process.

Values associated with The Wolds Station:

1. The Tekapo River is one of the top, if not the best, self-sustaining trout fisheries in the Central South Island Region. It also provides an important gamebird hunting resource. The Tekapo River borders the property and is proposed to be retained in Crown control.
2. The Mary Burn is a valued trout fishery. The National Angler Survey (NAS) has recorded a steady rise in angler use of the Mary Burn over the last 15 years. The latest estimate equates to an average of approximately 3 anglers fishing the river each day throughout the season. The most commonly fished reach is upstream from the Tekapo River confluence for about 5 km due to the reach being easily accessed from the Tekapo River and the landowner (D Fastier, Simons Hill Station) has been very helpful in providing access. This arrangement has been greatly appreciated by anglers. Anglers also fish the Mary Burn downstream from SH 8 where public access has recently been negotiated through tenure review. This, more obvious access to the Mary Burn has been invaluable and will likely increase overall angler opportunity in the future.
3. For three seasons from 1980 to 1982, Ministry of Agriculture and Fisheries staff operated fish barrier traps on the Mary Burn about 400m above the Tekapo River confluence. They recorded runs of adult trout from the Tekapo River into the Mary Burn of approximately 300 brown and 100 rainbow trout annually.
4. The research carried out by the Ministry of Agriculture and Fisheries staff in the Mary Burn found the size of the run of trout was significant for two reasons. Firstly, it confirmed the presence of considerable spawning and rearing habitat – there was sufficient space for an additional 400 spawners and successful incubation and rearing of juveniles was able to maintain that run. Secondly, angler recaptures of trout tagged as they passed through the trap in winter indicated many spawners took up temporary residence in the Mary Burn. After six months or so from spawning, January – February

*Statutory managers of freshwater sports fish, game birds and their habitats*

**Central South Island Region**

the following year, most of the migrants had either moved back to the Tekapo River or had been caught by anglers and only a few remained as resident trout taking up permanent adult habitat where available.

5. Irishman Creek is also a valuable fishery worthy of protection. The creek supports self sustaining populations of brown and rainbow trout that are independent of Mary Burn and Tekapo River populations.
6. Trout fishing is sustained around the gorge in the upper reaches of Irishman Creek. Angler use of Irishman Creek is not large. Anglers making the effort to fish the stream recognize its small extent and low productivity and few fish are removed during the season to ensure that anglers coming after enjoy the untouched wilderness experience.
7. Lake Pukaki is within close vicinity of the station and provides both sportsfishing and gamebird hunting opportunities. It is my understanding that the shore of the Lake is managed by Meridian, therefore will not be discussed in this submission.
8. The Mary Range provides habitat and hunting opportunity for the upland game birds: chukar and quail.
9. The Wolds Swamp has extensive sportsfish and gamebird resource values. The values of the swamp are adequately identified in the The Wolds Conservation Resources Report along with the appropriate area that should be protected.

Fish and Game submit:

10. Marginal strips along Mary Burn and Irishman Creek should be applied to guarantee foot access to anglers and the general public. The Mary Burn is a priority for protection due to the high number of anglers that visit the stream, as detailed above. If a marginal strip is not to be applied, Fish and Game request a formal agreement to be made with the land owner to not unreasonably withhold foot access for anglers and others wishing to walk the stream. While it would be beneficial for access to be provided along both streams, Fish and Game consider it more important that access is provided along the Mary Burn as it is a more significant fishery.
11. Fish and Game support the proposed area to be retained in crown control along the Tekapo River (CA1).
12. The spread and growth of invasive alder trees (*Alnus sp.*) in the lower Mary Burn and Tekapo River over the last 10 years may have its origin in mature alders on Irishman Creek. This species has become very common on the stream banks within 1m of the waters edge throughout these streams. Already thick stands of 3m tall saplings limit angler access and casting on the Mary Burn and Tekapo River. If left uncontrolled they will choke the banks and create problems for passage of flood waters. This issue has been acknowledged in the Upper Waitaki Consent Hearing process. Since the hearing process, Fish and Game have been organizing funding and a large force of volunteers to

target removal of alders. A lot of resources have been dedicated to organizing a control operation and while nothing is finalized yet, it is likely there will be a formal operation in place, in the near future. The success of the control program is dependant on access across the property and support of the landowner. The threat of wilding trees is noted in section 2.4.4 of The Wolds Conservation Resources Report where it states that "the removal of wilding trees, and continued control of wilding tree spread will be required to protect conservation."

13. The Mary Burn and Irishman Creek should be fenced from stock with appropriate buffer zones to prevent the degradation of water quality. This protection is especially important for the Mary Burn fishery considering its significant value.
14. The swamp area immediately southwest of the scientific reserve is to be disposed of by freehold. The management of this area will directly impact on the water quality within the Mary Burn therefore Fish and Game seek protection in regards to land use and stocking of this area. It is very important that the Mary Burn is fenced from stock with an adequate riparian zone in this area.
15. This swamp area is identified as a 'Recommended Area for Protection' (RAP), map 4.2.2 in 2.5 of The Wolds Conservation Resources Report with the entire area of wetland being recognised as a 'Site of Special Wildlife Interest'. Therefore Fish and Game is uncertain it is appropriate for this land to be disposed of by freehold.
16. The swamp area may also offer valuable gamebird habitat therefore access via the main road that leads to the scientific reserve should be retained to provide access for hunters through the scientific reserve. Fish and Game have not had an opportunity to assess this site.
17. The top of the Mary Burn range offers valuable chukar hunting opportunities, access along this range would be highly valued by hunters.
18. It is assumed that access will be retained to Lake Pukaki via Hayman Road.

Outcome sought:

- a) Retention of all legal roads including the public road adjacent to the Tekapo River. Fish and Game support the access proposed from the main road to The Wolds Swamp.
- b) Marginal strips should be laid off alongside the Mary Burn to provide foot access for anglers and the public. Access along the Mary Burn is a priority due to the streams recreational popularity, however it would be beneficial for access to be provided along Irishman Creek also.
- c) Expand the area to be retained in crown control and protected as a scientific reserve to include the entire swamp area within landscape unit 3 on the Landscape Unit Map provided with The Wolds Conservation Resources Report.



- d) Fish and Game are particularly concerned about the potential threat to water quality in the Mary Burn. The quality of water should be maintained by fencing the stream from stock and providing a riparian zone. Alternatively, if fencing and planting cannot be achieved the marginal strips should be turned into covenants with conditions governing stock access. Fish and Game also seek similar protection for Irishman Creek however in regards to sportfish habitat, Mary burn is a higher priority to safeguard from a sports fishery perspective.
- e) Access across the property to enable management of Alders.
- f) Public vehicle access for hunters along the top of the Mary Range to Mt Mary along existing easement e-f and further south along below f along the Mary Range. There should also be provision for access to CA2 for upland game hunting.
- g) Vehicle access to the Mary Burn via the Wolds Swamp for angler and management purposes along the formed track from SH 8 as marked on the map. Only foot access is necessary once at Mary Burn.
- h) The Wolds Swamp to be retained in full crown ownership, fenced off and protected with a covenant- support current proposal.
- i) Conditions are put in places that ensure the swamp area southwest of the scientific area (The Wolds Swamp) to be protected from certain land use and over stocking.
- j) Foot access from the scientific area to the southwest swamp area is provided for.
- k) Fish and Game have previously requested that a marginal strip is laid off along the Pukaki lake front. This is provided for via the main road and the land managed by Meridian.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Devon Christensen', with a stylized, flowing script.

Devon Christensen  
Resource Officer

125064

103 Onuku Rd

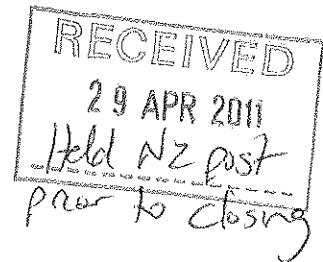
Akaroa

27-3-11

Commissioner of Crown Lands

c/- Darroch Ltd,

P.O. Box 143, Christchurch



Submission on Preliminary Tenure Review  
Proposal For the Wolds Pastoral Lease

Submission

The Mackenzie Country is one of our most iconic landscapes & needs to be protected as much as possible for now & future generations

The freeholding of so much of the Wolds pastoral lease, against D.O.C. recommendations of Conservation areas, does not do this. This is an area which is highly visible from one of the major tourist routes of N.Z. The areas that D.O.C. recommend for protection are of significant inherent values and should not be freeholded.

We all know that we have only one chance to get this right. Once this crown land falls under private ownership we have lost all control to promote sustainable management of this land.

I feel this proposal should be withdrawn and be renegotiated to protect areas of importance and then renotified for public submissions.

Yours faithfully

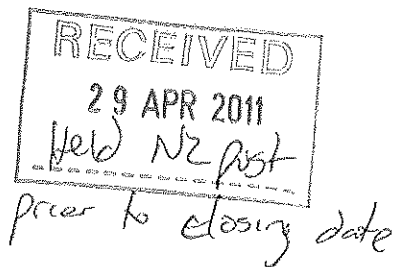
Stephen Carowell

Stephen Carowell

125 065

6 Homebush Rd  
Glentunnel  
Canterbury

29 March 2010



THE COMMISSIONER OF CROWN LANDS  
C/- Darroch Ltd  
PO Box 143  
Christchurch

THE WOLDS PASTORAL LEASE TENURE REVIEW PRELIMINARY  
PROPOSAL

I am **opposed** to the preliminary Tenure Review proposal for the Wolds because the proposal does not fulfil the objectives of the Crown Lands Pastoral Act (CPLA).

The proposal does not protect significant inherent values nor does it promote the management of reviewable land with significant inherent values in a way that is ecologically sustainable required by the CPLA Section 24 (a) (i).

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

The proposal does not provide for public access 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 landscapes of the Mackenzie Basin are some of the most spectacular in New Zealand. They are unique and cannot be replicated. Once cultivated the effects on the landscape and ecology are irreversible. Linz should protect the landscapes and ecology of the Mackenzie Basin for future generations. The proposal should be withdrawn and the property remains as pastoral lease.

R. J. Snoyink

Rosalie Snoyink