

Crown Pastoral Land Tenure Review

Lease name:

ALLANDALE / GREENVALE

Lease number: PS 068 / PS 067

Public Submissions

- Part 3

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

February

08

Royal Forest and Bird Society - Upper Clutha Branch
- Anne Steven.

(11)

**Allandale/Greendale Pastoral Lease
Submission on Preliminary Proposal for Tenure Review**

Points to make in submission:

General

We applaud the permanent protection of the landscape that provides the setting for Lake Wakatipu, from Bushy Creek to Southwest Bay. This clearly reflects an active resolve to implement and adhere to recent government policy.

We also are pleased to see the permanent protection of the headwaters and higher altitude areas of the middle reaches of Roberts Creek, and the Bushy Creek catchment. The proposed CA area is large and compact and rationalises the existing Scenic Reserves which currently have boundaries that relate poorly to the landscape.

This area is a major recreational asset for Kingston, affording great views up the Lake and westward of the Eyre mountains as well as a easily accessible tramp to a significant altitude.

We support protection measures to protect the natural character of the proposed covenanted areas, although we submit that the conditions need to be tightened to be effective.

We are concerned that the proposal has utilised a conservation resources report that is based on a survey of the property taken almost 10 years ago, well before the current understanding of low altitude landscape and ecological values. As a result we have identified two areas that appear to have been overlooked. We suggest that in the course of considering submissions that these areas be inspected and values assessed afresh.

We are also alarmed at the extent of development that has been permitted on pastoral lease land in Roberts Creek, significantly compromising the natural landscape values that would have previously existed. In particular there is an excessive amount of tracking/fence line clearance leaving multiple scars on the land (show images). The work if done following granting of consent, must have had the approval of the DOC. We are surprised that the DGC appears to have given his approval to this development; unless the CCL granted consent without the approval of the DGC which he is able to do.

Comments on Specific Proposals

CA

1 Will there be 4WD and horse access permitted to Trig 102 No and 102? Suggest there should be (if the track is OK now), summer/autumn time only from December to April with short term closure after heavy rain or snow during that time.

2 Rationale for thin dog leg of fencing between new fence A-B and the rectangle of wetland on the basin flood at G-H....it appears the map is too coarse and doesn't

accurately reflect the actual paddock/wetland layout here. I attach a google photo showing where it appears the fence should go in order to adequately encompass the wetland areas. There is a thin pale coloured area that also looks like a cultivated paddock within this area, not sure it worth including or not, may be impractical to exclude it.

3 Fence c-z is probably going to be a discreet alignment, providing the covenant conditions are strong for CC1b so that a grazing demarcation does not arise. Currently the areas appear as one and this should be retained into the future.

It is tempting to include more of the ridge and snow tussock tops in CA but it is difficult to find a discreet line along the base of the slope without taking in too much very modified "farmland" – maybe better left as a covenant area but review the conditions.

Although, considering again, perhaps we should recommend that the snow tussock area be part of CA. Fence A to c will create an unnatural division of landscape. Most of the area is above 900-1000m altitide, it is very small and of little pastoral value on its own and more likely to be eaten out with consequent visual demarcation with rest of range. It is unlikely to receive fertiliser.

This area is seen from the highway approaching from the southeast some distance away – it is obvious as snow tussock tops and it should remain that way, with a healthy cover of tussock. The fact the catchment below is forested does not preclude the tops from being protected as it is still visually important. Suggest therefore fence should swing around above the bluffs and return to the west boundary in Waterwheel creek about 1km down from the top (see photo and amended map). An easement for stock movement would need to be provided with a condition that stock must move through they are not permitted to stand and graze. And no further tracking is to be made through the area (there is already one track through).

CA - Roberts Creek area

1 Fence F-E is probably OK as a line related to topography. We would like to see all the remaining riparian beech included in the CA however. This would mean extending the CA about 2.5km downstream. It should take in a 200-300m margin out from the creek on the true left as a buffer. It needs to be protected as it has been burnt recently and can be grazed, preventing any regeneration. The strip would also allow for public access and enjoyment of landscape about the creek.

2 Using the snow fence as a boundary will result in an unnatural division of landscape because of the strong difference in land use. This is already apparent. There is no alternative available, however a buffer zone could be utilised in the freehold area to reduce the effect or at least give it some coherence.

3 It will be important that the condition for easement c-d-e for stock movement ensures stock will be only moving through and not hanging around grazing the area. Special Conditions 2 and 3 is probably adequate and reasonable. The holding paddock shape at d should be carefully related to topography as it will become an isolated green patch potentially. The conditions at 9 require protection of the environment. It will not be possible to move stock across the area without damaging native vegetation. Cattle may also cause ground disturbance. There needs to be some explicit recognition of this including a clear statement of what an acceptable level of damage

is; and an ability by the Grantor to require cessation of stock movement should an unacceptable level of damage result. The Concessionaire should also be required to promptly carry out any removal of weeds that appear as a result of moving stock, and to round up (or shoot if unable to be mustered in) any stock that escape.

CA - Basin Floor Terrace

We submit that the remnant alluvial terrace in CC1a (middle area) be included in the CA as well as a portion of the old lake outlet as well as the very small area of leasehold land at Kingston.

This terrace and outlet channel has remnant short tussock grassland and as such is valuable. It would make a valuable addition to the conservation area, being the only bit of basin floor tussock grassland contiguous with the range slopes this adding overall landscape/ecosystem appreciation and maintaining some of the natural integrity of the landscape. This area is traversed by a public walking/biking route as well as the Kingston Flyer and therefore is enjoyed at close quarters. Its geomorphological value is also of note and the short tussock cover is part of that natural heritage as well as being a good cover for legibility of landform. No mention of this short tussock grassland was made in either the landscape or ecological sections of the CRR, and there is no mention of the ecological values in the Schedule 1 (3) Values to be Protected for CC1a. We consider this to be an unfortunate oversight.

We were disappointed to find a locked gate at the Kingston end of what we thought was a public road. The gate is probably on the leasehold land however. There will need to be access provided for vehicles (??) and horses. This may need to be provided through the leasehold until such time as the QLDC can provide appropriate access through the road reserve (depending on which is the best route practically).

Covenant CC1a – short tussock area only

We support the intent of protecting the landform values of these basin floor features, by controlling land use on the areas. Notwithstanding our recommendation to include short tussock area in CA, if it remains as a covenant area, only sheep should be grazed over the short tussock and at a light stocking rate. Their purpose is to manage the weed population and rank grass growth to nurture the tussock community. Clause 3.1.4 should not be deleted. There should be no further fencing within the area and there should be no more structures in it. Clause 3.1.3 should not be deleted unless the species are indigenous and do or are likely to have existed there. Clause 3.1.2 should apply to indigenous species only. Clauses 3.1.5 and 3.1.6 should not be deleted.

Covenant CC1b

We support the protection of the landscape and ecological values of this rugged steep east facing ridge. It is very important as part of the walls of the basin south of Kingston, that are highly visible from the highway and the Kingston Flyer. The natural character needs to be enhanced. The statement of values should be embellished to emphasise it is the natural character that is important – with an absence of unnatural forms colours and shapes (that can arise from fencing subdivision, scrub

and bracken clearance, tracking and tree planting). The regeneration of the shrubland present is also important, including in areas currently occupied by bracken.

Regarding the conditions, the following is recommended:

1. Sheep only may be grazed in CC1b. Cattle, goats, deer and pigs would damage the indigenous vegetation and prevent regeneration
2. The statement of values states the area is vulnerable to further subdivision (by fencing). Fences subdividing the area can only be erected with the Minister's approval so as to ensure the visual outcome is adequately considered. Clause 3.3 should be applied to existing fences only.
3. shelter belts should not intrude into the more natural rock bluff area (unlikely in any case)

We have recommended that the snow tussock area above the bluffs be retained as CA. If this were not so, it should be grazed only lightly by sheep for a short time so as to preserve and nurture the snow tussock cover. This may require it to be fenced off.

Covenant CC2

We are concerned that shrubland/woodland remnants in the gullies have not been explicitly recognised. Protection of woody cover would also assist in retaining aquatic values, the main reason for covenanting this area. We observed native woody vegetation occupying parts of the gullies in this area. (see photo)

We note that the covenant conditions prohibit any further burning, spraying or topdressing and oversowing, as well as excluding cattle. Adherence to these conditions should also encourage the riparian woodland.

We recommend that new fence C-D is not cleared by bulldozer blade first as this will leave an undesirable scar.

Other Matters

Allen Creek Wetland at GR688262

There is a large wetland surrounded by cultivated paddocks. Any wetland especially large ones are worthy of protection and enhancement. A covenant should be placed over this wetland with the intent of preserving it and improving its ecological health. The covenant should require the preparation of a management plan for it to the approval of the Minister. This should include catchment management, exclusion of cattle and deer, and comprehensive weed control, and reinstatement to a natural condition of any drains affecting it.

Photo attached.

Shrubland on Riser, Mataura River valley

There is a narrow band of native shrubland on the terrace riser parallel to the Cainard Road. It would be easy to fence this off from stock and leave free from disturbance to regenerate. Native shrubland contributes significantly to the landscape experience, and Cainard Road is a public entry route to the DOC areas in Roberts Creek and beyond. This could be a covenant area.

Photo attached.

Roberts Creek Freehold

No conditions have been placed over the Roberts Creek faces apart from CC2. These faces form the true right of the valley and are what people look at as they move up the valley to the conservation area (as long as they can see through the plantation trees on the true left). Already the landscape values have been significantly compromised by multiple tracking and fence line clearance, and burning and AOSTD. Further down valley and on the true right, extensive blanket plantation forestry has obliterated indigenous cover and obscures landform details.

It is our view that further plantation forestry is contemplated on Greendale. We recommend that a condition be placed over the land that forestry is not permitted past the larger tributary coming off point 1426 on the main ridge, some 2km north of the boundary with the forested area. This coincides with an existing fence and access track. The top margin of trees should relate to the natural landform, rather than a straight line as has been adopted down valley.

Doing this will provide a large grazed buffer between forested area and the bulk of the new CA. This will enable something of the natural character of the valley to be protected. A band of grazing should also occur across the top of any planting to assist in wilding control.

A bond should be in place for the cost of removal of any wildings found in the CA.

Regarding the remainder of the freehold area, AOSTD and burning and spraying should not be permitted within 300m of the boundary with the CA. This will prevent inadvertent adverse effects on the vegetation in the CA (eg singing or spray drift) and will also encourage a visual transition between hard grazed and managed land and ungrazed self-managed CA.



1 Multiple tracking on Roberts Creek faces creating an undesirable level of visual scarring, combined with extent of burning and AOSTD is significantly compromising the natural landscape character and amenity values of this valley

2 Recommended fence line on flats at Bushy Creek mouth, encompassing the wetland areas. Active restoration may be required (based on Google image).



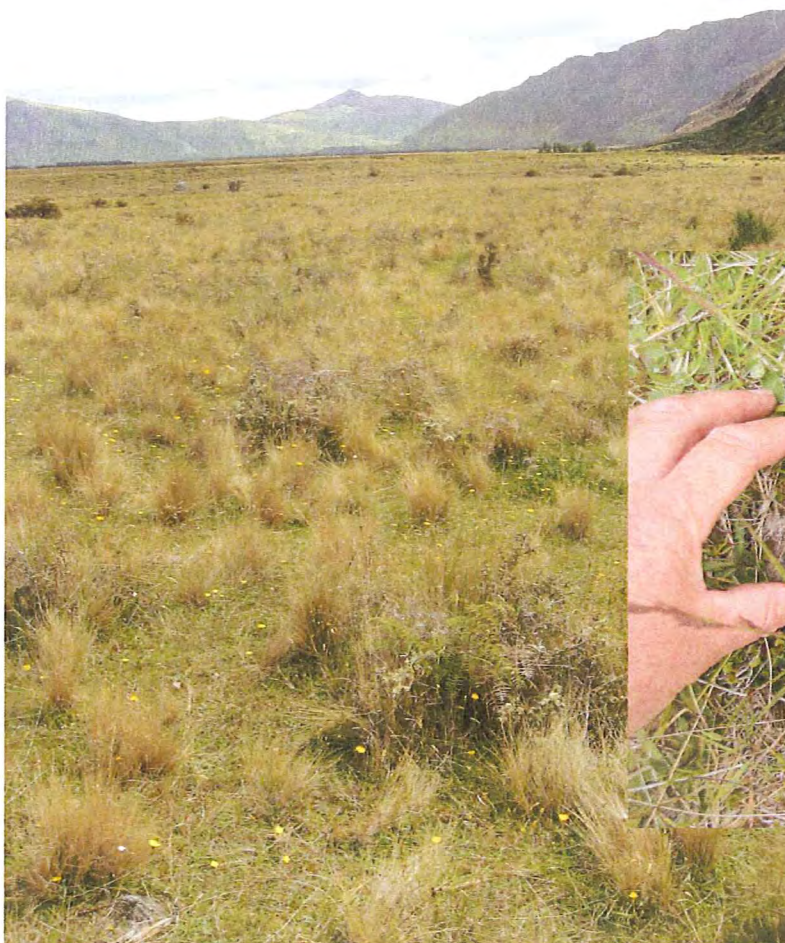


3 Recommended fence line in CC1b to minimise visual fragmentation. Land above fence should ideally be included in the proposed conservation area.



4 Short tussock grassland on middle CC1a area. This area requires protection and should be part of the proposed conservation area. Without ploughing and conversion to exotic pasture (and the terrace is very bouldery) this flat has little grazing value. Ploughing would have a significant adverse effect by destroying the native cover and reducing its aesthetic value. There is an array of native inter-tussock species present here.

Close up of tussock cover and, below, examples of native inter tussock flora





5 Riparian shrubland in CC2 (including *Hoheria*, *Coprosma*, *Matagouri* species) needs to be protected, for its own sake and for the health of the streams, habitat to galaxid.

6 Below – wetland area in amongst farm paddocks just north of the Greenvale homestead. This area needs protection with a chance to restore itself.

