

## **Crown Pastoral Land Tenure Review**

**Lease name: BARROSA**

**Lease number: PC 125**

### **Public Submissions - Part 6**

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

**December**

**05**



24 June, 2005

The Commissioner of Crown Lands  
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DTZ New Zealand Ltd.  
27 JUN 2005

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Attention: Mr Geoff Holgate

Dear Mr Holgate

**PO 207 BARROSA PASTORAL LEASE  
SUBMISSION ON PRELIMINARY PROPOSAL FOR TENURE REVIEW**

Thank you for advising Environment Canterbury of the release of the Preliminary Proposal for tenure review of Barrosa Pastoral Lease. We appreciate the opportunity to review the proposal and make a submission in relation to the future management of this land.

Environment Canterbury has statutory responsibilities under the Resource Management Act 1991 (RMA) for the sustainable management of natural and physical resources of the region, including soil conservation, water quality and quantity and ecosystems, and for maintenance of biodiversity. In addition, Environment Canterbury also has statutory responsibilities under the Biosecurity Act 1993 for the management or eradication of animal and plant pests in accordance with regional pest management strategies. These responsibilities are entirely compatible with achievement of the objectives of Tenure Review, specifically to "promote the ecologically sustainable management of High Country land" and protecting land with "significant inherent values" by retaining it in Crown ownership.

The Canterbury Regional Policy Statement 1998 (CRPS) provides an overview of the resource management issues of the region, and sets out how natural and physical resources are to be managed in an integrated way to promote sustainable management. Key to the management of soils is the maintenance or restoration of a vegetative cover over non-arable land that is sufficient to prevent land degradation or the onset of erosion (Ch7 Objective 1). Sustainable management of water resources requires safeguarding the life-supporting capacity of water, including associated aquatic ecosystems and significant habitats of indigenous fauna and vegetation (Ch9 Objective 3). Policy 11 in Chapter 9 promotes land use practices which maintain or enhance water quality

Environment Canterbury has recently notified its Proposed Natural Resources Regional Plan (NRRP) to address the resource management issues identified in the CRPS and to provide more specific standards and methods, including rules, to achieve the objectives. The NRRP promotes the integrated management of soil and water resources with provisions that emphasise the links between land use practices and the management of water quality.

The Soil Conservation chapter (Ch8), Objective SCN1 seeks to:

*"...maintain soil quality and an intact and resilient vegetation cover sufficient to minimise the risk of induced erosion, safeguard the life-supporting capacity of the soil, and prevent, as far as practicable, the movement of soil into water bodies."* The objective contains specific guidelines for intact and resilient vegetation cover. Policy SCN1 provides options to restore such a cover where it has become depleted.

Policy WQL5 of the Water Quality chapter includes a range of regulatory and non-regulatory methods to manage the riparian margins of rivers to maintain or improve water quality.

**Our Ref:** PL5C-103; AG5T/99L  
**Your Ref:**  
**Contact:** Cathie Brumley

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The Canterbury Regional Pest Management Strategy (1998) and Canterbury Regional Pest Management Strategy Biodiversity Pests (2002) identify a number of species of plants and animals for control or management as pest species.

In line with these statutory responsibilities and documents, and Section 24 of the Crown Pastoral Lands Act (1998), Environment Canterbury staff have reviewed the Preliminary Proposal for Barrosa Pastoral Lease to assess the impacts, if any, of this proposal on the sustainable management of the land, including indigenous biodiversity protection, soil conservation and the integrity of the water bodies. Our comments and recommendations are listed below.

### General Comments

The Barrosa pastoral lease combines outstanding landscape, geological, natural and cultural values. It is identified as an Area of Outstanding Landscape under the Ashburton District Plan, and forms part of two larger landscapes identified in the Canterbury Regional Landscape Study as both outstanding and regionally significant.

The lease dominates the landscape seen from the Ashburton Gorge Road and provides the main backdrop to the popular Mt Somers Walkway area.

Barrosa lease is bounded by the South Branch of the Ashburton River, the mainstem of the Stour River and the West Branch of the Stour River. Management of the land area will therefore have important implications for water quality in these rivers and for Lake Emily at the northern edge of the lease. Chapter 4 of the Proposed Natural Resources Regional Plan seeks to maintain water bodies, including the Ashburton and Stour Rivers, in a high quality state where they are largely unaffected by human activities. The integration of land management and water quality management should be seen as fundamentally important to the "ecologically sustainable management" of the land in this lease.

Much of the land within this lease is classified as Class VII land that has limited potential for production. This land is also highly vulnerable to erosion from soil or vegetation disturbance. Combined with the outstanding landscape and natural values present within the lease there is strong support in this submission for retaining land with high values and high risk within Crown ownership or Crown control.

The following submission looks more specifically at the ability of the Preliminary Proposal to achieve the long-term ecologically sustainable management of the Barrosa pastoral lease land. The recommendations are based on the analysis of documented information. No site visits were able to be made in the time available to prepare this submission.

### Soil Conservation

Achieving the objective for the ecologically sustainable management of high country land will rely on the protection of the quality and quantity of soils on this lease. The quality of soils will determine their ability to support a healthy vegetation cover and to prevent the onset of erosion which could lead to a permanent loss of soil fertility, together with the risk of sedimentation of water bodies.

The following discussion of issues relating to the management of soil conservation values has been based on the documents accompanying the Preliminary Proposal together with soil and vegetation information sourced from maps prepared for the Soil and Water Conservation Plan programme undertaken as part of the Land Improvement Agreement (LIAs) entered into with the former South Canterbury Catchment Board. This LIA had a term of five years and expired in 1972. However the property plan and the policies for stocking management and erosion control provide a basis for understanding the physical limitations of the leasehold land for production.

The LIA was established to improve the management and vegetation cover of soils at risk of erosion. A considerable amount of fencing was undertaken as part of the plan for erosion control and grazing control on land most vulnerable to erosion. Much of the higher risk land has been included in the proposed areas CA1 and CA2 as land to be restored to full Crown ownership and control:

- (i) most of the three large blocks where grazing was controlled are included within CA1
- (ii) the erosion control fencing put in place has been used as the boundary between CA1 and the freeholded land above the South Ashburton River and the West Branch Stour Stream
- (iii) an area of severely eroded land in the south-eastern part of the property that was planned to be fenced as part of the LIA has been included within the CA2 area.

These designations are supported.

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A further area south of Markhams Stream that had grazing restrictions under the LIA for erosion management has been included as land to be freeholded. This land is inherently at high risk of erosion from grazing or soil disturbance. It is recommended that this area should be retained under Crown control to ensure the long term protection of soil conservation values.

Recommendations:

- That area CA1 is extended to the original block fence on its southern boundary to include remaining land at high risk of erosion.
- That area CA2 is supported for protecting highly erosion-prone land

### Indigenous vegetation, habitat and wetlands values

Tenure review provides a valuable opportunity to help achieve two key objectives of the Reserves Act 1977 and the New Zealand Biodiversity Strategy (2001). These are, respectively, "preservation of representative samples of all classes of natural ecosystems and landscapes" and to "maintain and restore a full range of remaining natural habitats and ecosystems to a healthy functioning state." A complimentary objective of the tenure review process is to ensure that conservation outcomes are consistent with the New Zealand Biodiversity Strategy.

The Land Environments of New Zealand landscape classification system (Leathwick et al. 2003) provides a framework for securing protection and/or restoration of examples of the full range of terrestrial vegetation and habitats. Land environments, and potential natural vegetation cover (in the absence of human modification) are classified at four different national scales: Level I (20 land environments nationally), Level II (100 land environments nationally), Level III (200 nationally) and Level IV (500 nationally). Each is nested within higher levels. The 500 Level IV environments provide the most detailed information on the diversity of New Zealand's terrestrial environments and is the best nationally comprehensive estimate of the 'full range' of ecosystems, habitats and biodiversity.

Analysis of Land Environments in conjunction with spatial data depicting indigenous vegetation cover (from Land Cover Data Base) and current legal protection has recently been carried out by Landcare Research (Walker et al. 2005), for the Department of Conservation. This analysis offers a useful method of identifying the most threatened environments, and therefore determining what should be priorities for protection of indigenous biodiversity, as part of tenure review. In reporting this work, the authors recommended that threat classification analysis be carried out using Level IV Land Environments, as these provide a more accurate, efficient and plausible assessment at regional and local scales.

Examples of nine Level IV Land Environments are present on the Barrosa pastoral lease (Leathwick et al. 2003):

- P1.2d – Mountains east of Southern Alps, Marlborough to Otago
- E1.4c, E3.1a, E3.2b, E4.1b, E4.2a, E4.2b – Central Dry Foothills (central South Island east of the Southern Alps)
- J2.2a – Central well-drained soils of inland mid-Canterbury
- N2.1c – Eastern South Island Plains.

These nine Land Environments are listed, in altitudinal sequence (highest to lowest) as they occur on Barrosa pastoral lease, in the table below. The table also shows the percentage of indigenous vegetation remaining in each land environment nationally, and the proportion of each environment that is already protected in existing reserves or conservation covenants. Threat categories are assigned on the basis of these figures (from Walker et al. 2005)

Lvl IV Land Environment	% Indig Cover Remaining	% Protected	Threat category	Examples included in CAs?
P1.2d	94.09	48.76	No threat category	Yes
E1.4c	59.89	27.31	No threat category	Yes
E4.2a	64.53	26.17	No threat category	Yes
E4.2b	26.78	5.0	At risk	Yes (small area around Lake Emily)
N2.1c	1.89	1.4	Acutely threatened	Yes (tiny area)
E3.1a	10.27	3.11	Chronically threatened	Yes

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E3.2b	3.56	1.07	Acutely threatened	Yes
J2.2a	24.73	1.76	At risk	No
E4.1b	27	3.82	At risk	No

This table shows that most of the areas proposed for protection are the higher altitude areas that are those environments least threatened at a national level. The main omissions are examples of the West Branch Stour River and South Branch Ashburton River valley floor environments. However, a few relatively small extensions to the proposed conservation areas would go a long way to improving the representative protection for the full range of land environments and habitats present on the pastoral lease.

Lake Emily is recognised in the Conservation Resources Report (CRR) as "one of the best examples of a small lake wetland system" in the Hakatere Ecological District. Protection of the surrounding swamp area and the contributing streams will be critical to sustaining the quality and ecological functioning of this system.

Priority must be given to securing opportunities for the protection of the most threatened environments if the tenure review process is to deliver conservation outcomes consistent with its own objectives, and with the New Zealand Biodiversity Strategy.

### Recommendations

That before any final recommendation for freeholding is completed, provision is made for the sustainable, long-term protection of the range of significant inherent natural values present on the Barrosa pastoral lease. In addition to the areas identified in the Preliminary Proposal, the following extensions to CA1 and CA2 would incorporate the diversity of habitats found within the lease area, with particular emphasis of those habitats currently underprotected in the reserve system:

- Extend CA1 at its western edge to the South Ashburton River valley floor to get full altitudinal sequence and include examples of "At Risk" valley floor habitats
- Extend CA2 at the top NW end to the West Branch Stour River valley floor to include all of the red tussock wetland, as recommended by DoC.
- Extend CA2 at its downstream (southern) end to include Chronically Threatened and Acutely Threatened valley floor habitats in the Stour River.
- Connect CA1 to CA3 to obtain a full altitudinal sequence from summit to valley floor, including streams feeding into Lake Emily, and the significant "Ephemeral Wetland – Stour Valley" described in the CRR. As suggested in the CRR, some level of grazing may have to be maintained to prevent encroachment and competition from exotic grasses in the surrounding land.
- Fencing of the boundaries of the Crown areas should occur both to identify these areas and to protect the values they contain.

### Surface water and ground water resources

The Preliminary Proposal and the Conservation Resources Report contain little information on the type of streams within the pastoral lease, and on the relationships between land management and the long-term ecological sustainability of the aquatic ecosystems. Management of the land surrounding rivers and wetlands will play a key role in the long term protection of water quality and instream values, as well as influencing the quality of rivers downstream from the pastoral lease.

Surveys by Environment Canterbury have shown that gravel bed streams in the South Ashburton River catchment generally have very high water quality and "clean bedrock or gravels" and are largely in a natural state, unaffected by human activities. Chapter 4 of the Proposed Natural Resources Regional Plan (NRRP) seeks to maintain the high water quality of these rivers and streams and to minimise the amount of sediment, nutrients and faecal matter reaching the streams from adjacent farmland. The plan also promotes the retention, maintenance and planting of riparian vegetation to minimise bank erosion and to reduce runoff of sediment, nutrients and animal faecal matter. (Policy WQL 5)

A change in land status or intensification of land use on land designated as freehold in the Preliminary Proposal could potentially increase the risk of sedimentation or contamination of the rivers bordering the Barrosa lease. The impact of intensive agricultural land use activities on water quality and ecosystems is well documented, most recently in the report "Growing for Good" by the Parliamentary Commissioner for the Environment. Tributary streams because of their size and limited assimilative capacity are particularly susceptible to degradation. Grazing of riparian margins, for example, reduces vegetation stature and trampling of soils and banks results in an increase in sedimentation. One of the most effective ways of

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maintaining water quality is to restrict stock access to water ways and to maintain well vegetated riparian margins to trap pollutants in runoff from adjacent land.

Section 24C of the Conservation Act 1987 provides for the management of riparian margins. It states that marginal strips can be established to protect water courses, maintain water quality and aquatic life, and to enable public access. Marginal strips and a cover of riparian vegetation will contribute to the protection of the water quality and aquatic ecosystems as well as acting as a buffer for land use activities.

The exclusion of livestock by fencing and establishment or maintenance of vegetated buffer strips along the margins of the smaller Stour River and West Branch Stour River to remove any sediment or nutrients from surrounding land, appears warranted as it offers the only effective long-term sustainable method of protecting the current high quality status of this water way and its instream values. This will be important in the event of any further intensification of land use on the lower hillslopes and valley floors as a result of freeholding land in these parts of the lease.

In previous proposals any new fencing requirements were shown on the Designation Plan. In this case it has not been indicated. Similarly no attempt has been made to identify all water bodies where marginal strips will apply. Provision of this information would assist in the preparation of submissions and it is requested that it be included on all future Preliminary Proposal maps.

Livestock access and recreational vehicle access to the South Ashburton and Stour Rivers should be prevented as far as is practicable. If the legal road along the true right of the Stour River is to be used to move livestock, the tributary streams crossing the road should have culverts installed to minimise the entry of sediment and faecal matter.

Chapter 4 of the Proposed Canterbury Natural Resources Regional Plan seeks to maintain water bodies, including the upper Waitaki catchment, in a natural state, where rivers and their tributaries are largely unaffected by human activities.

The change in title from pastoral leasehold land to full Crown ownership or freehold land offers a "one off" opportunity to put in place measures to safeguard, in the long-term, the health of aquatic ecosystems and to protect water quality. Environment Canterbury is devoting considerable resources through its "Living Streams" programme to restoring water ways, mostly groundwater fed streams, which have already been degraded as a result of land use activities. It is generally more cost effective to protect a waterway by preventing a decline in water quality and habitat values, rather than trying to restore a degraded water body.

Recommendation:

### 1. South Ashburton River:

Environment Canterbury would support fencing of the true left bank of the South Ashburton River to minimise access by livestock and vehicles to the riverbed area.

### 2. Stour River

- That marginal strips are applied along the full length of all rivers adjoining freeholded land to maintain the high natural, cultural and landscape values of these waterways.
- That marginal strips along the Stour River are fenced where they abut freehold land and managed to maintain water quality and protect the riverbed habitat.
- If the legal road along the true right of the Stour River is to be used to move livestock, the tributary streams crossing the road should have culverts installed to minimise the entry of sediment and faecal matter.

## Geological features

Geological type sections are established as reference points to define geological formations. As geological interpretations change the type sections are often re-evaluated or used for further investigations. Therefore, some form of protection needs to be secured to protect these areas.

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Potential threats to these outcrops could include such land use activities as tracking, forestry, quarrying. Environment Canterbury would support the protection of the type section for the Barossa Andesite either by extending the boundary of CA1 to encompass these areas or to use another mechanism such as a covenant on the title to restrict certain land uses.

### Public Access

Proposed access to conservation areas CA1 and CA2 is limited in the Preliminary Proposal. If there is a potential for greater use of the area, then it would be in the interests of both the public and the freehold land owners for access routes to be formalised.

The inclusion of foot access from Lake Emily to point O at the northern end of the CA1 conservation area; and provision of vehicular access to CA2 from the Ashburton Gorge Road would be supported.

### Recommendations

Environment Canterbury acknowledges and supports the areas proposed to be restored to full Crown ownership and control as contributing to soil conservation management and the protection of examples of some of the indigenous habitats of the area. However these areas, on their own, fall short of achieving the objectives of the CPLA as they fail to include the range of lower altitude habitats or identify conditions required to protect the important values of the South Ashburton and Stour Rivers and their tributaries. The Preliminary Proposal also fails to provide for the integrated management of soil and water resources as identified in the NRRP, particularly with regard to the management of river margins and the prevention of any adverse effects of future land intensification on water quality.

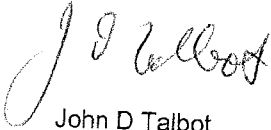
The following recommendations for alterations and additions to the areas for protection have been identified to provide for the ecologically sustainable management of the soil and water resources and the range of associated habitats of the Barossa lease:

1. That CA1 is extended as follows:
  - Extend the southern boundary to the original block fence to include remaining land at high risk of erosion.
  - Extend western edge to the South Ashburton River valley floor to get full altitudinal sequence and include examples of "At Risk" valley floor habitats
  - Connect CA1 to CA3 to obtain a full altitudinal sequence from summit to valley floor, including streams feeding into Lake Emily, and the significant "Ephemeral Wetland – Stour Valley" described in the CRR. This will also provide for public access to CA1 from Lake Emily road access
2. That CA2 is extended as follows:
  - Extend the top NW end on the West Branch Stour River valley floor to include all of the red tussock wetland, as recommended by DoC.
  - Extend the downstream (southern) end to include Chronically Threatened and Acutely Threatened valley floor habitats in the Stour River.
3. That marginal strips are applied along the length of all rivers adjoining freehold land to maintain the high natural, cultural and landscape values of these waterways.
4. That marginal strips along the Stour River are fenced along the boundaries with all freehold land and managed to maintain water quality and protect the riverbed habitat.
5. If the legal road along the true right of the Stour River is to be used to move livestock, that all tributary streams crossing the road should have culverts installed to minimise the entry of sediment and faecal matter.
6. That the boundaries of the Crown areas should be fenced both to identify these areas and to protect the values they contain.
7. That all new fencing required is shown on the designation plan in this and future proposals.
8. That the Preliminary Proposal identifies all water bodies where Marginal Strips will apply.

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Thank you for the opportunity to comment on this Preliminary Proposal.

Yours sincerely



John D Talbot

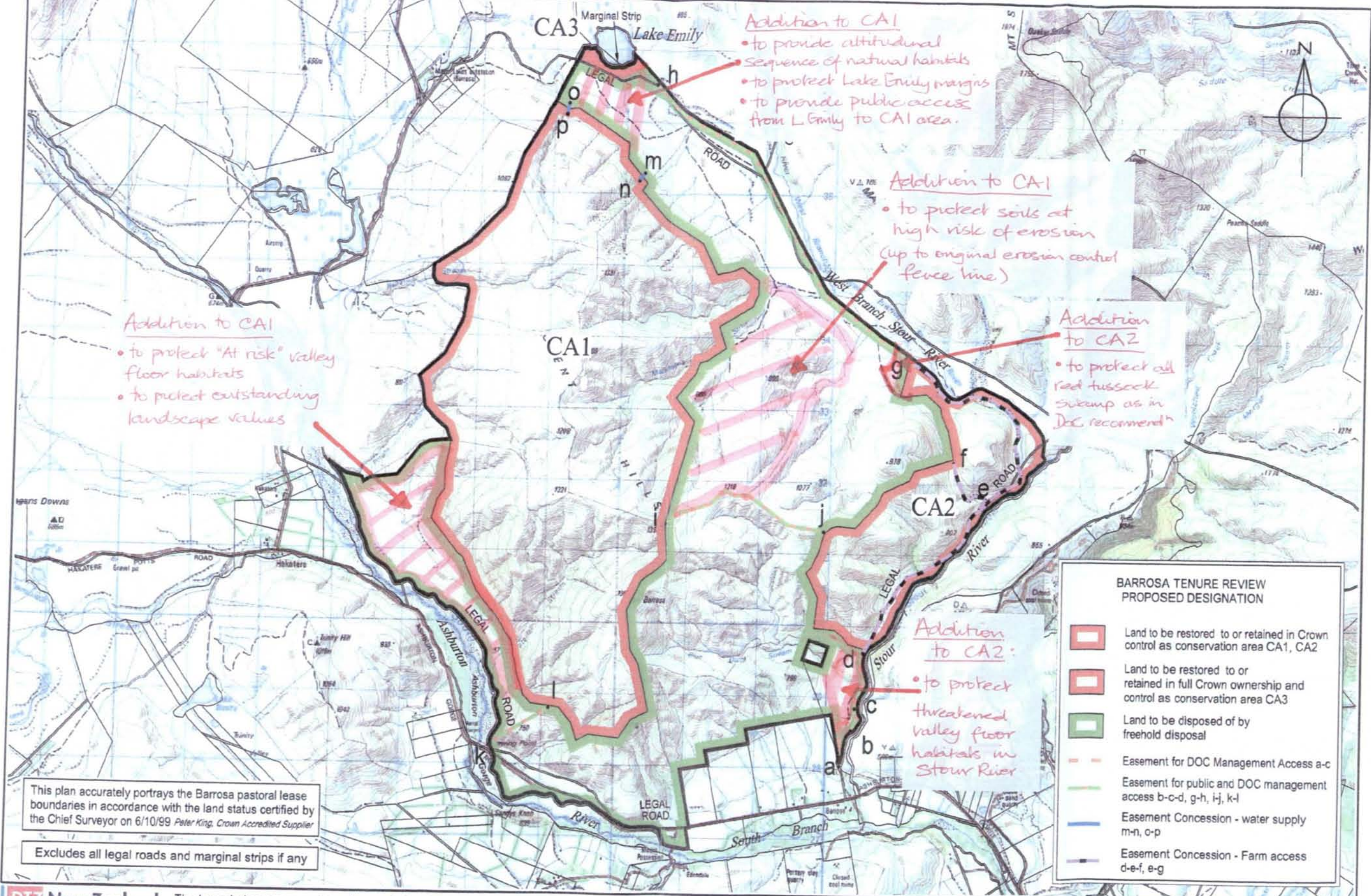
**DIRECTOR OF POLICY AND PLANNING**

Attachments:

Map showing recommendations for further areas to be restored to full Crown ownership and managed for the protection of soil and water conservation.



# Proposed additions to conservation areas



This plan accurately portrays the Barrosa pastoral lease boundaries in accordance with the land status certified by the Chief Surveyor on 6/10/99 Peter King, Crown Accredited Supplier

Excludes all legal roads and marginal strips if any



The boundaries shown on this plan are indicative and are for illustrative and discussion purposes only. Precise boundary positions will be determined by survey during implementation

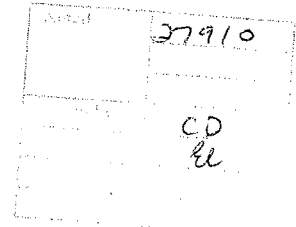
Land being disposed of as freehold will be subject to Part IV A of the Conservation Act 1987, and Part IV A applies to the entire length of the river or stream within the boundaries of the land to be disposed of



Version	1	2	3	4	5
Canterbury Land District	Sheet 1 of 2				
Topographic Map 260 - J36 & K36	Date: August 2004				

271 Centaurus Rd  
Christchurch 8002  
23 June 2005

Commissioner of Crown Lands  
c/- DTZ New Zealand Ltd  
PO Box 142  
CHRISTCHURCH



Dear Sir

**RE: PRELIMINARY PROPOSAL FOR TENURE REVIEW OF  
BAROSSA PASTORAL LEASE**

This submission is presented by the Peninsula Tramping Club (Inc). We are one of the larger tramping clubs in Christchurch, with approximately 200 members. We organise over 100 tramps every year, of which a large proportion visit high country pastoral leases.

The Ashburton Lakes area is an important recreation zone in mid-Canterbury. However it currently lacks publicly accessible upland wilderness areas with good views of the Lakes area. The Clent Hills offer excellent day-trip opportunities suitable for walkers and trampers of moderate fitness, and would consequently be a valuable addition to the recreation opportunities in the Ashburton Lakes area.

Therefore we are pleased to see that significant areas of the Clent Hills range are proposed for Crown ownership in this proposal. The public access easements b-c-d, g-h, i-j and k-l are appropriate and all are necessary.

We are however concerned about the following aspect of the proposal:

- There is no provision for easy public access to the northern end of the Clent Hills. This is an important omission. Without any provision enabling a through trip over the northern end of the range, virtually no trampers would venture to this area. Consequently the northern half of CA1 would be almost valueless from a tramping point of view.

We therefore propose that there should be an easement for public access from the northern tip of CA1 (just to the west of the water supply easement o-p) to the legal road at a point west of Lake Emily. This should follow the fenced boundary of the freehold land. The distance is only half a kilometre, and would have minimal impact on farm management. In conjunction with the legal road access from the Hakatere Heron Road, this would provide suitable public access to the northern end of the Clent Hills.

Thanking you for the opportunity to make this submission.

Terry Thomsen

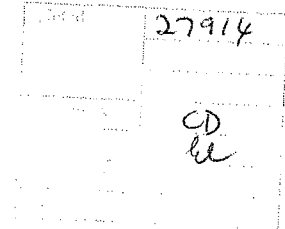
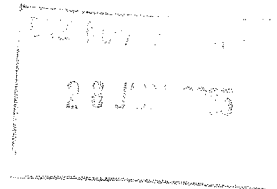
Peninsula Tramping Club (Inc.)

## Council of Outdoor Recreation Associations of New Zealand Inc

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27 June 2005

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DTZ New Zealand Ltd  
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Dear DTZ

### Submission: Barrosa Tenure Review Preliminary Proposal

This submission is made jointly on behalf of the New Zealand Deerstalkers' Association Incorporated, the national body of recreational deerstalkers, and the Council of Outdoor Recreation Associations of New Zealand Inc (CORANZ).

CORANZ consists of the following national outdoor recreation associations:

- NZ Deerstalkers Association
- Public Access New Zealand
- NZ Federation of Freshwater Anglers
- NZ Salmon Anglers Association
- NZ Bowhunters Society
- Marlborough Recreational Fishers Association

The Council represents the common interests of the million or more New Zealanders who fish, shoot, tramp, ski, canoe, climb, walk, mountainbike, botanise, photograph, relax etc in New Zealand's great outdoors. Individual members of CORANZ may also be making more extensive submissions.

The New Zealand Deerstalkers' Association Incorporated is the national association of deerstalkers and other big game hunters and clubs, with a membership of 6,800. It advocates for big game hunters and public access for them, and for conservation protection generally.

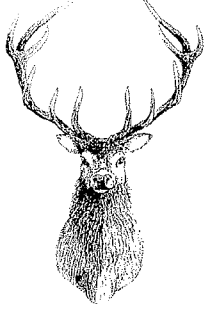
### 1 Summary of Proposal

- 12 ha (CA3) directly south of Lake Emily as lake protecting area
- 2842 Ha (CA1 (Clent Hills) and CA2 (Stour Faces)) to be restored to full Crown control as conservation land
- 2,893 Ha to be freeholded
- public easements i) from near the bridge on the Ashburton Gorge Road, up a steep spur to CA1 (k-l); ii) in the SEW corner, alongside the Stour River to CA2 (a-b-c-d) and iii) along the NE side of the property beside the west Branch, Stour River (g-h) to Lake Emily.

### 2 Our Concerns about this Tenure Review:

We make the following comments:

**2.1 Marginal Strips should be discussed and shown:** All strips taken out as part of this tenure review should be movable. Movable marginal strips were introduced in 1990, and should apply to the reservation under this tenure review, eg by an exchange of all fixed strips for movable strips,



*BarrosaTR*

# *New Zealand Deerstalkers' Association*

*Incorporated*

as allowed under Part IV A, Section 24E, of the Conservation Act. This should be possible by LINZ working with DOC to achieve this highly improved outcome. It would also help submitters to have the actual marginal strips to be reserved shown in the Preliminary Proposal, eg on a separate marginal strip cadastral map, to avoid clutter on the tenure proposals map.

Movable marginal strips give much greater flexibility to providing public access should stream river or lake beds change in future, as required by the Crown Pastoral Lands Act (S 24 (Objects) (c) (i)) "securing" ie secure access. This is better provided by movable strips, rather than fixed ones, because erosion may occur in future.

**NZDA/CORANZ Decision Sought:** All marginal strips to be marked and made movable, and shown separately on a cadastral map, in future Pastoral Lease tenure review consultations.

**2.2 Conditions of change in the access easements:** To make these more permanent, we ask that all easement agreements include that any proposal to change the easement require public notification of this intention.

**2.3 Additional Access needed from the North end of Clent Hills (CA1) to/from Lake Emily:** We are surprised and disappointed that there is no public access to/from CA1 from the North End eg from the Lake Emily public land. The only direct access to this landlocked area (CA1) is via a very steep ridge ((k-l) from the Ashburton Gorge Road. The trip along the tops of the Clent Hills and out to Lake Emily would make a great one day tramp. But this is impossible without a northern exit/access.

Equally the ability to do an afternoon's walk from Lake Emily up to the Clent Hills crest would be very desirable on its own.

**CORANZ/NZDA Decision Sought:** A public strip of land between Lake Emily and CA1, accessible at all times by the public, including by hunters, to better secure public access to the Clent Hills (CA1).

**2.4 Additional Leased Land that should be returned to Conservation Land:** We are concerned that the following areas have not been returned to public conservation land:

**a) Range Crest from South of Barrosa to Point 1350 (?)** - High steep land (up to 1367 metres) along the crest of the range beside Mt Barrosa (1367 m), on the north side of Blue Duck Stream. This land is very steep and dissected, and does not appear to be capable of sustainable grazing. It is also some of the highest land in the lease. It has significant inherent values for landscape, scenery, amenity, recreation and open space.

**b) Rhyolite Residual point 978; Add to CA2:** This is an important volcanic formation that should be included in CA2. Its southern and eastern sides are spectacularly steep, and do not appear capable of sustainable production. The whole peak should be included in CA2. It has significant inherent values for landscape, scenery, amenity, recreation and open space. Right of Way e-f should be appropriately extended, if required.

**There are also significant inherent ecological values in these two areas:** We strongly support the Royal Forest and Bird Protection Society submission, which puts the case very well, namely:

**F&B Submission:** CA1 Clent Hills and CA2 Stour are both considerably reduced in size from the areas identified as having significant inherent values and deserving protection in DoC's 1997 Conservation Resources Report.

Major omissions from the proposed conservation areas in the preliminary proposal include:

- Part of Area 1 -Mt Barrosa i.e. the south facing gullies from the summit ridge including the upper part of Blue Duck Stream. The CRR described this area as containing the best tall tussock grassland on the property with a good diversity of indigenous plants, including uncommon species such as *Lihnocarpa carnosula* and few exotic species.
- The valley floor, fans and lower slopes of Area 7 Northern Stour Valley hard tussockland on the north –eastern slopes of Clent Hills. Only the higher altitude part of this area is proposed for protection.
- Part of area 9 Stour River Rhyolite including high point 978 and a low saddle on the western side of this where the CRR identified there being a red tussockland on poorly drained soils.

Topdressing, oversowing, burning and continued grazing have been identified as major threats to the RAPs identified in the two PNA survey reports for the Heron Ecological Region<sup>1</sup>. These activities are also a threat to these areas described above.

The preliminary proposal gives no explanation or reasons as to how the freeholding of these areas is consistent with the CPLA, protects significant inherent values or promotes ecologically sustainable management.

#### **NZDA/CORANZ Decisions sought**

1) Expand CA1 to include all of Area 1 Mt Barrossa and all of Area 7 Northern Stour hard tussockland.

2) Expand CA2 to include knob 978 and the nearby red tussock wetland.

**c) Greater Protective land area around Lake Emily:** We strongly support the Royal Forest and Bird submission, which puts the case very well, namely:

**F&B Submission:** Lake Emily is approx 20 ha of shallow (approx 2 metres deep) open water amidst a swampy tarn (approx 50 ha) fed by small streams and seepages. It is part of the 274 ha RAP Hakatere 5-Lake Emily. The wetland is described as in the PNA survey report as "one of the best examples of a small lake wetland system"<sup>2</sup> It supports bog rush, red tussock, pukio and a diversity of other sedges. The threatened *Aciphylla subflabellata* is found here. Red tussock and fescue tussock dominate the surrounding terrestrial vegetation.

Lake Emily and its associated wetland provide habitat for moderate numbers of waterfowl<sup>3</sup> at various times of the year including grey duck, scaup, and paradise shelducks. The wetland is an important nesting and feeding area for waterfowl.<sup>4</sup> Southern crested grebe occur in spring and summer.<sup>5</sup> A wider buffer area is needed to protect the lake margins and hydrologically connected areas from stock damage and grazing. Past practice of lessee allowing stock access to Lake Emily and the absence of any proposals for fencing means that stock damage is likely to continue.

Proposed access easement k-l which rises steeply from the road and is likely to deter less agile walkers and trampers from enjoying proposed CA1. Recreational use to Lake Emily is already well established for fishers, walkers and others. Providing access to the northern end of Clent Hills from Lake Emily, as well as

<sup>1</sup> Harrington W.M.A et al (1986) and Arand, J and Glenny D (1990).

<sup>2</sup> Harrington, WMA et al (1986) "Heron Ecological Region, Arrowsmith, Hakatere and Two Thumn Ecological Districts Survey report for Protected Natural Areas Programme". Published by Department of Lands and Survey.

<sup>3</sup> Harrington WMA et al (1986).

<sup>4</sup> Dons, T and Stringer, D (Nov 1992) at p 360.

<sup>5</sup> DoC (1997?) Barrossa-Conservation Resources Report

*the southern end, would be more practical and consistent with current recreational use patterns, and take advantage of the gentler terrain.*

*Protecting this northern corner of the lease as proposed below would avoid the need for new fencing to protect the lake margins.*

**CORANZ/NZDA Decision sought**

Extend CA1 down the lower north eastern slopes of Clent Hills to the lease boundary as far as the fenceline to the south east of Lake Emily (i.e the fenceline immediately east of the proposed m-n easement concession for water supply).

**2.5 Protection of Red Tussock Values – South Ashburton Gorge:** We strongly support the Royal Forest and Bird Protection Society submission, which puts the case very well, namely: **F&B Submission:** *“A small area of red tussock wetlands adjacent to the road, south-east of Blowing Point is the first area of predominantly indigenous vegetation that travellers see close to the road as they approach the Lake Heron Basin. The area has significant ecological and landscape values. The steep rocky lower slopes of Clent Hills provide a dramatic backdrop to this small tussockland.*

*These lower faces of Clent Hills and the unnamed gully to the east of Blowing Point are inappropriate for freeholding because of their landscape values, steepness, unsuitability for grazing and strongly regenerating indigenous shrubland cover.*

*The red tussock wetland and these rocky faces deserve restoration to full Crown ownership and protection as conservation land for the following reasons:*

- *Red tussock wetlands are hugely reduced in extent because of cultivation, burning, drainage, OSTD and their conversion to exotic pasture. Any that remain have high significant inherent values.*
- *The lessee currently grazes cattle in the wetland. Continued grazing will degrade the significant inherent values. Current and previous lessees have developed all of the other relatively flat land adjacent to the road and replaced indigenous tussock, shrubland and other vegetation with exotic grasses and trees. Recent vegetation clearance and cultivation across the Ashburton Gorge road for development purposes (on the south-western side) from the red tussockland highlights the risk to this wetland.*
- *The 1997 Conservation Resources report noted that “Blowing Point Swamp and its steep rocky side slopes are the subject of a unique and striking vista from the road at Freezing Point, and are important as the “entrance” to the Heron Basin.” (DoC 1995 para 2.1.3). The areas was mapped as having landscape value in the 1997 Values Map in the Conservation Resources Report.*
- *The Upper Rangitata/Arrowsmith/Lake Heron area is one of a “Six Pack” of new high country parks, proposed by Forest and Bird and Federated Mountain Clubs. The proposal also includes the Rakaia, Rangitata, Harper Range conservation areas, Lakes Heron, Roundabout and Camp, and the new Lake Heron conservation lands; and likely additions from tenure review on nearby pastoral leases such as Barrosa. The Blowing Point wetland and the bluffs behind it, Blowing Point itself and the Ashburton Gorge are the obvious entrance to the park. Freeholding these red tussock wetlands risks their degradation and destruction.*
- *Under unencumbered freehold tenure, there would be no certainty that the existing indigenous vegetation would not change to a more modified landscape, compromising existing ecological and landscape values. Grazing, burning, oversowing and topdressing, afforestation, and tracking are likely or possible future uses. Continued grazing will cause tussock condition to decline. Other uses will change the vegetation cover to more exotic.*
- *The Resource Management Act and the Ashburton District Plan will not prevent the cultivation, overgrazing and destruction of the wetland. To the best of Forest and Bird’s knowledge no resource consent for modification of tussock grassland or other native vegetation have been notified for public submissions since the Plan became operative in 1998.*

- *It would be consistent with the Government's High Country Objectives (Cabinet Policy Committee POL (05)14 including to "ensure that conservation outcomes for the high country are consistent with the New Zealand Biodiversity Strategy." The freeholding of a significant lowland red tussock wetland is not consistent with Objective 1.1<sup>6</sup> of the Biodiversity Strategy.*
- *In the eight years since DoC's 1997 Conservation Resources Report on Barrosa, the importance of lowland tussocklands and the extent of their depletion has become increasingly recognised. Less than 80,000 ha (less than 2 %) of the remaining "predominant" tussock grasslands are managed by the Department of Conservation. (MfE, 1997 **The State of New Zealand's Environment**, p 8.72) Given the under representation of tall tussock, including red tussock in the conservation estate, and their extensive depletion, all of the Blowing Point red tussockland, including the area recommended by DoC should be protected.*
- *Elsewhere in the Conservation Resources Report, DoC has noted "Unless severely depleted or modified, most high country wetland vegetation types should be protected, because nationally and internationally, wetlands are greatly modified and under-represented in protected natural areas." (DOC Modified Barrosa CRR, Part 4 July 1999) The failure to protect this area is inconsistent with the report and a significant oversight. Given its small size, its grazing value is likely to be low.*
- *No information is provided on how freeholding and continued grazing of the red tussock wetland would promote ecologically sustainable management as the CPLA requires.*

*The Ashburton Gorge road and the unformed legal road at the base of the rock outcrops provide adequate access for moving stock between the proposed or existing freehold land and grazing on the river terraces above the South Branch of the Ashburton River without the need for a new easement for stock access. Dung on the sealed road indicates that it is already used to move stock.*

#### **CORANZ/NZDA Decision sought**

Add to CA1 as conservation land, the red tussock wetlands and adjacent rocky slopes between Blowing Point bridge and the spur which descends south of knob 1016 to the Ashburton Gorge Road.

**2.6 Protection of Landscape Values – South Ashburton Gorge:** We strongly support the Royal Forest and Bird Protection Society submission, which puts the case very well, namely:

**F&B Submission:** *The Ashburton District Plan identifies the full length of the Ashburton River as an area of Significant Nature Conservation Value. The Ashburton River is one of the most important braided rivers in Canterbury for birdlife (O'Donnell, 1992).*

*The river adjacent to Barrosa has a semi-braided character. Riparian areas are highly natural with minimal signs of human modification, and indigenous species such matagouri are evident. The area has high landscape values as a Boffa Miskell report for Environment Canterbury has noted:*

*"The lower gorge (Blowing Point) is flanked by attractive rock outcrops. The Ashburton Fans which extend from below the Stour confluence to the Hakatere Heron Road are an area of Significant Nature Conservation Value (in the Ashburton District Plan) based on the significant vegetation free river bed supporting a range of indigenous community types and bird species. The river has highly natural water and river edges. Sandy's Knob, Trinity Hill and the adjoining river*

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#### <sup>6</sup> **Protecting indigenous habitats and ecosystems**

##### **Objective 1.1**

- a) *"Enhance the existing network of protected areas to secure a full range of remaining indigenous habitats and ecosystems.*

##### Action

- b) *Add to public conservation lands those habitats and ecosystems important for indigenous biodiversity that are not represented within the existing protected area network or that are at significant risk of irreversible loss or decline, or in situations where public ownership is needed for effective management."*

*terraces as you enter the gorge from the south are noted for their strong landforms, aesthetic coherence and legibility.*<sup>7</sup>

.....  
*"The lower gorge has value as an entry point to the wider Hakatere valley beyond, giving exceptional views out to this landscape to the west as you leave the gorge..."*

*Natural character is derived from the high water quality, the natural river edges on Barrosa, the natural variability of the flow and the general lack of apparent human modifications.*

*With Hakatere pastoral lease having withdrawn from tenure review, Barrosa is a rare opportunity to protect riparian land with significant inherent values adjacent to the Ashburton River.*

*The proposed unencumbered freeholding of river terraces upstream of Blowing Point is opposed for the following reasons:*

- the potential impacts of farm activity on these riparian margins from earthworks, cultivation, burning, or allowing stock to access the riverbed. Stock in the riverbed can trample nests and eggs and disturb breeding birds with potentially severe impacts on breeding success. Weed spread from the river margins into the riverbed would also degrade significant inherent values.*
- The proposed boundaries of CA1 in chopping the higher latitude lands off from any connection with the river do not promote ecological sustainable management.*
- The history of riparian management in the Hakatere/Ashburton Lakes area has been to cultivate, oversow and develop land right up to the waterway without leaving adequate buffer areas.*
- No information is obvious in the material provided under the Official Information Act that the terraces have significant economic value for grazing.*

#### **CORANZ/NZDA Decision sought**

(Favoured option) Restore to full Crown ownership and protective management as conservation land all land on the north bank of the South Branch of the Ashburton River upstream of where the spur from knob 1016 descends to the south and almost touches the Ashburton Gorge Road (see Map 1 attached).

(Or) Make freeholding subject to a sustainable management covenant to protect ecological and landscape values which prohibits indigenous vegetation clearance (other than to allow stock passage along a stock track or to maintain existing fences), burning, OS&TD, cultivation, afforestation or further tracking on the river terraces and all land upstream of Blowing Point bridge.

Thank you for the opportunity to comment. We wish to be notified when the decisions on this TR are available.

Yours Truly



Dr Hugh Barr  
Secretary, CORANZ and  
National Advocate, NZ Deerstalkers Association

cc Forest & Bird

<sup>7</sup> Boffa Miskell (June 2001) "Natural Character, Landscape and Amenity Values of the Ashburton/Hakatere River, Lakes and Tributaries", Report prepared for Environment Canterbury U01/44.



74 OXFORD ST  
 ASHBURTON  
 5-7-05

TO GEOFF HOLGATE  
 DT2 NZ LTD  
 P.O. BOX 142  
 CHRISTCHURCH.

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SUBJECT: BARROSA TENURE REVIEW.

I ACKNOWLEDGE THE LATE PRESENTATION OF THIS SUBMISSION BUT FEEL COMPELLED TO OFFER MY CONCERNS.

OVERALL CONCERNS:

SIGNIFICANT LANDSCAPE VISTAS & FLORA NEED TO BE ADDED TO SUGGESTED CROWN OWNERSHIP.

AREA 1.

THAT AREA OF LAND BOUNDED BY CA3, CA1, H TO M, & THE BOUNDARY FENCE OF BARROSA/CASTLE RIDGE SHOULD BE SECURED FOR CONSERVATION TO PROVIDE A CONNECTION WITH LAKE HERON CIENT HILLS AREA & CA1. WHEN VIEWING THE IMMEDIATE LAKE EMILY AREA THE VISTA IS SEEN TO BE IN A NATURAL STATE TO THE HORIZON ON THREE SIDES. A LARGER PREFERRED BUFFER ZONE IS PROVIDED.

AREA 2.

THAT AREA FROM FREEZING POINT TO BLOWING POINT INCLUDING THESE ROCK PROMINANCES & ALL LAND FROM THE ROAD TO CA1 IN BETWEEN SHOULD BE SECURED FOR CONSERVATION AS SOME OF THE FEW SUCH OUTCROPS & CLOSE TO ROAD VISTAS IN THE AREA. THIS SECUREMENT WOULD PROVIDE A MORE ACCESSABLE CONNECTION TO CA1.

2.

AREA 3

SHIFT FENCE FROM STOUR RIVER BED TO TOP OF TERRACE & PROPOSED FREEHOLD LAND & SO PROVIDE A NATURAL VIEW WHEN USING ACCESS BEING SOUGHT FROM ASHBURTON GORGE ROAD ALONG STOUR RIVER TO POINT D.

Yours faithfully  
Larry Rattray.