

Crown Pastoral Land Tenure Review

Lease name: BEN LEDI

Lease number: PO 199

Public Submissions - Part 2

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

September 06

use and to secure public access can occur if they are consistent with the primary objectives. Tenure review was noted as a key tool for achieving these objectives.

While it is outside the tenure review brief to dictate how land should be used, it is well within the CPLA objectives to ensure that the designations given to land are appropriate to the long-term sustainable management and protection of significant inherent values identified for the land.

The following discussion will review the extent to which the Preliminary Proposal has provided for the integrated and long-term, ecologically sustainable management of land and water resources of the Ben Ledi lease and the protection of the significant inherent values identified for the land.

Soil Conservation

On the basis of land use capability, the Preliminary Proposal has included the majority of land with the most limited potential for production, or with highest erosion risk, within the land to be retained by the Crown. This is seen as a good outcome for soil conservation and the proposal is to be commended.

Land on the Ben Ledi lease was subject to a Land Improvement Agreement that was signed on 1 December 1971 but expired 10 years later in August 1981. The Soil and Water Conservation Plan included a number of objectives that were largely completed during the life of the plan. These included:

- (i) fencing and developing the good Class VI land at lower altitude
- (ii) use a rotational mob stocking system of grazing management to match Land Use Capability and to control rank growth and reduce the need for burning
- (iii) fencing out the higher and more vulnerable tall tussock grasslands in the head of the Maerewhenua River primarily for water conservation

With respect to the land proposed for free holding under the Preliminary Proposal, most of the lower altitude land has been fenced and top dressed and the vegetation will reflect this improvement. There is a significant proportion of unimproved land along the upper faces of the Maerewhenua Spur that is impractical to fence but which has limited potential for production. From a Land Use Capability point of view, the unimproved land on the sunny faces of the spur have very limited potential for production and will continue to require careful grazing management to maintain a healthy vegetation cover that will minimise the risk of erosion of these slopes.

The best feature of the proposal, from a soil conservation perspective, is that the upper Wether block created by the Soil and Water Conservation Plan to control seasonal grazing, prohibit burning and protect the tall tussock grasslands and depleted aspects in the headwaters of the water-short Maerewhenua River, will be retained in Crown control as CA1. The original erosion control fence is used as the boundary between freehold and Crown land. This is fully supported.

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 seven Level IV Land Environments are present on the Ben Ledi pastoral lease (Leathwick et al. 2003):

- Q1.1a, Q1.1d, Q1.2a, Q2.1a, Q2.1c – Southeastern Hill country and Mountains
- N3.1e, N3.3a – Lower hillslopes and outwash plains (Lower Waitaki , Oamaru).

These seven Land Environments are listed, in altitudinal sequence (highest to lowest) as they occur on Berwen 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	% Indigenous Cover Remaining	% Protected	Threat category
Q1.1a	98.37	24.81	No threat category
Q1.2a	98.99	37.2	No threat category
Q1.1d	84.66	32.48	Not threatened
Q2.1a	38	8.09	Critically underprotected
Q2.1c	24.56	8.16	At risk
N3.1e	12.65	1.96	Chronically threatened
N6.1a	32.95	1.94	Acutely threatened

The three highest altitude land environments present on the Ben Ledi lease (Q1.1a, Q1.2a and Q1.1d) have, at a national and regional level, retained most of their indigenous cover, are already fairly well represented in the existing network of protected areas, and are therefore not considered to be threatened.

The next highest (Q2.1a) has, throughout its overall range, lost more of its indigenous cover, is somewhat less well represented in existing protected areas and is assigned the threat category 'Critically underprotected'. The mid-slope environment Q2.1c has, throughout its overall range, lost most of its indigenous cover and is also poorly represented in protected areas. Its threat category was assessed as 'At risk'. Loss of indigenous cover has also been greatest on the lower hillslopes and outwash plains environments (3.1e and N3.3a). Again, these environments are extremely underprotected in existing reserves. These are the most highly threatened environments present on Ben Ledi pastoral lease with threat categories of 'Chronically threatened' and 'Acutely threatened' respectively.

The proposed CA1 contains examples of non-threatened Southeastern Hill Country and mountain land environments on the crest and slopes of the Kakanui Mountains (Q1.1a, Q1.2a, Q1.1d) as well as small examples of 'Critically unprotected' mid-slope environment Q2.1a. Tall tussock grassland is the main vegetation cover throughout this area.

Most of the proposed CC1 is also non threatened land environment Q1.1d, but it extends downslope to include a small example of threatened mid-slope environment Q2.1a and tiny example of Q2.1c. This covenant area includes remnant native shrubland vegetation as well as tall- and short-tussock grassland. Proposed CC2 also includes examples of threatened environments Q2.1a and Q2.1c supporting native shrubland and hardwood forest vegetation. No examples of the two most highly threatened environments N3.1e and N3.3a are proposed for protection, however neither support significant native vegetation on Ben Ledi pastoral lease.

The conservation areas and covenants detailed in the preliminary proposal include some, but not all, of the significant inherent values identified and described in the Conservation Resources Report (CRR). In particular, remnant native shrubland, scrub and forest vegetation in the gorge of the Maerewhenua River South Branch ('At Risk' environment Q2.1c) and the mid faces above the South Branch identified in the Conservation Resources Report as being diverse and containing some

unusual vegetation, have largely been proposed for freeholding. These areas are also important for their rich invertebrate fauna.

Environment Canterbury has serious concerns, however, at the lack of effective conditions included in the conservation covenants to achieve any real protection of these values on land proposed for freeholding.

Specific conditions of concern:

- Schedule 2 Condition 3, of the conservation covenant allows for the continuation of grazing of sheep and cattle at stocking rates "no greater than that typically applying before the start of the covenant". This is a "business as usual" arrangement that places little significance on protection of values.
- Schedule 2 Condition 5 which gives the owner the right to create a 30 metre wide access way through CC1 and along the northern boundary, in addition to the right under Condition 6 to maintain the existing track through the covenant. The degree of disturbance proposed in this condition runs the risk of major adverse effects on the quality of the habitat, and of causing erosion and sedimentation of the waterways traversing the covenant and the South Branch along the base of the covenant.
- Schedule 2 Condition 7 allowing the owner to topdress and sow seed in CC2 without any restriction will further accelerate the modification of the land and must risk compromising the habitat values of this area by minimising any opportunity for natural regeneration of the indigenous species.
- While there is a monitoring programme required to record condition and trends of the shrublands, there is little information on the level of monitoring or effects to be monitored, or the setting of review periods to determine any effects of management on the values of the area. Monitoring programmes should address all the significant values and be reviewed at least at 3 yearly intervals to assess the degree of impact of the Covenant conditions on the conservation values identified for the area.

As written, the Conditions in Schedule 2 will not provide adequately for the protection of the values listed in Schedule 1.

Without a robust and rigorously monitored set of conditions in place, Environment Canterbury recommends that the land proposed as CC1 and CC2 remains in Crown control and any grazing or access is subject to the maintenance and protection of those values. This approach is recommended as being more consistent with the objectives of the CPL Act.

Recommendations

All remaining areas of native vegetation on threatened environments should be priorities for protection of indigenous biodiversity under the tenure review process.

- Extend CC1 to include greater protection for the native scrub, shrubland and forest vegetation in the Maerewhenua South Branch gorge, from the lower boundary of the property to link with CA1.
- Extend CC2 further up the North Branch to cover all the significant area identified in the CRR.
- Either designate areas proposed as CC1 and CC2 as land to be retained in the Crown, or amend the Schedule 2 special conditions of the conservation covenants to provide adequate long-term protection of the values identified. This will include establishing a more detailed monitoring programme with specified review periods and the option to discontinue any of the land use activities listed in Schedule 2 if they are shown to be adversely affecting the values.

Surface water and ground water resources

The Bed Ledi tenure review proposal encompasses significant reaches of both the North and South Branches of the Maerewhenua River. This river is one of the major lower tributaries of the Waitaki River and supports a wide range of aquatic and fishery values. The report notes that marginal strips exist along most of the length of both branches, and that these are to be retained as marginal strips. These ensure access but not protection of the water quality of these headwater reaches. Furthermore a significant farm access track follows along much of the length of the south branch reach. There is

also a historic water race sourced and following above the south branch reach. This is presumably a historic mining race, and authorised under historic mining legislation.

The high tussock reaches of the property are proposed as a conservation area, to conserve intact native tussocks, and this would also be beneficial to the rivers. The south eastern face of the Maerewhenua Spur could be argued for similar return to Crown ownership as it is predominantly steep, cold faces, and contributes much of the catchments of the South Branch of the Maerewhenua River as a series of dark cool tributary streams. However it also contains the main access track to considerable farm infrastructure (woolshed, yards and hut) and so retains farming value. The proposal therefore lists a conservation covenant over a portion of this face rather than the whole face. It would be preferable for river values if this face (especially upstream/upslope of the CC1 covenant) was ungrazed and therefore retained as conservation estate. This would render the aforementioned farm infrastructure inaccessible/redundant and remove the need for the riverside access track.

It is of concern that the conditions of the conservation covenants CC1 and CC2 both provide for ongoing grazing by sheep and cattle but no conditions are included to keep stock out of the streams. The water quality of these streams is inherently high and they are important for trout and native fish. Also the right for the owner of CC1 to create and maintain a 30m wide access way runs the risk of exacerbating the risk of soil erosion and sedimentation of the tributary streams and downslope into the South Branch of the Maerewhenua River.

Tributary creeks or small rivers, because of their size and limited assimilative capacity, are particularly susceptible to degradation from agricultural activities such as grazing, and tracking. 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 maintaining water quality is to restrict stock access to water ways, avoid disturbance of the soil adjacent to water ways, and to maintain well vegetated riparian margins to trap pollutants in runoff from adjacent land.

Chapter 4 of the Proposed Natural Resources Regional Plan seeks to maintain water quality in a natural state, where rivers and their tributaries are largely unaffected by human activities (Objective WQL 1). 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).

Once a property becomes freehold through the tenure review process, the property can be used for a wide range of land uses, subject only to the Resource Management Act 1991 and the various statutory plans. It is reasonable to expect that the proposed freehold portion of the Ben Ledi property will need to be developed further to improve its economic viability as a smaller unit.

Although dictating the future use of the property is beyond the scope of the tenure review process, the change in title from public leasehold land to freehold land offers a "one off" opportunity to ensure that the long-term protection of the water resources, and the values placed on these by the wider community are safeguarded. Once the property becomes alienated from Crown ownership it becomes very difficult to manage land uses to minimise adverse effects on waterways. During the tenure review process, the alignment of Crown and freehold property boundaries should take into account the needs for protection of water ways and their aquatic ecosystems, and the measures to achieve this, such as retaining important waterways under Crown ownership and fencing freehold boundaries along riparian margins to exclude livestock from entering the water ways.

Recommendations

- *Extend CA1 or CC1 to protect all the steep facing slopes and tributary streams draining into the South Branch of the Maerewhenua River between CA1 and CC1.*

Public access

The tenure review process also offers an opportunity to resolve public access difficulties to the conservation estate to meet the needs of the public while minimising interference with farming operations. The Maerewhenua Spur provides strategic access to the greater Kakanui mountains area and should be secured for a range of recreational activities including walking, mountain biking, ski touring and possibly horse riding. There is already a well formed farm track along the Spur, and the Preliminary Proposal provides for DoC management access along this route. This would provide much more secure access than along the margins off the South Branch.

Recommendations

Environment Canterbury recommends that at a minimum the proposal provides for foot access along the Maerewhenua Spur up to CA1.

Recommendations

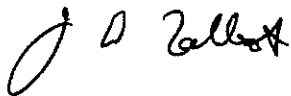
In the interests of the long-term ecological sustainability of land and water resources of this property, and for the protection of the significant inherent values identified for the land, and the provision of safe, secure public access to the Crown land, Environment Canterbury recommends the following amendments to the Preliminary Proposal for Ben Ledi to meet the objectives of the CPLA for tenure review:

1. Extend CC1
 - (a) to include greater protection for the native scrub, shrubland and forest vegetation in the Maerewhenua South Branch gorge, from the lower boundary of the property to link with CA1.
 - (b) to protect all the steep facing slopes and tributary streams draining into the South Branch of the Maerewhenua River upstream from CC1 to the CA1
 - (c) to retain in Crown ownership the margins of the South Branch of the Maerewhenua River including the main areas of indigenous shrublands, up to the boundary of CA1 and require the fencing of these riparian margins where they form a boundary to freehold land. An easement should be arranged to ensure that the landowner has access to streams where stock drinking water supply is required.
2. Extend CC2 further up the North Branch to cover all the significant area identified in the CRR.
3. Provide for public access along the Maerewhenua Spur track from the lower property boundary to the CA1 area.
4. Either designate areas proposed as CC1 and CC2 as land to be retained in the Crown, or amend the Schedule 2 special conditions of the conservation covenants to provide adequate long-term protection of the values identified. This will include establishing a more detailed monitoring programme with specified review periods and the option to discontinue any of the land use activities listed in Schedule 2 if they are shown to be adversely affecting the values.
5. Environment Canterbury recommends that at a minimum the proposal provides for foot access along the Maerewhenua Spur up to CA1.

The accompanying map shows the areas recommended above as additions to land requiring protective mechanisms for the protection of significant inherent values.

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

Yours sincerely

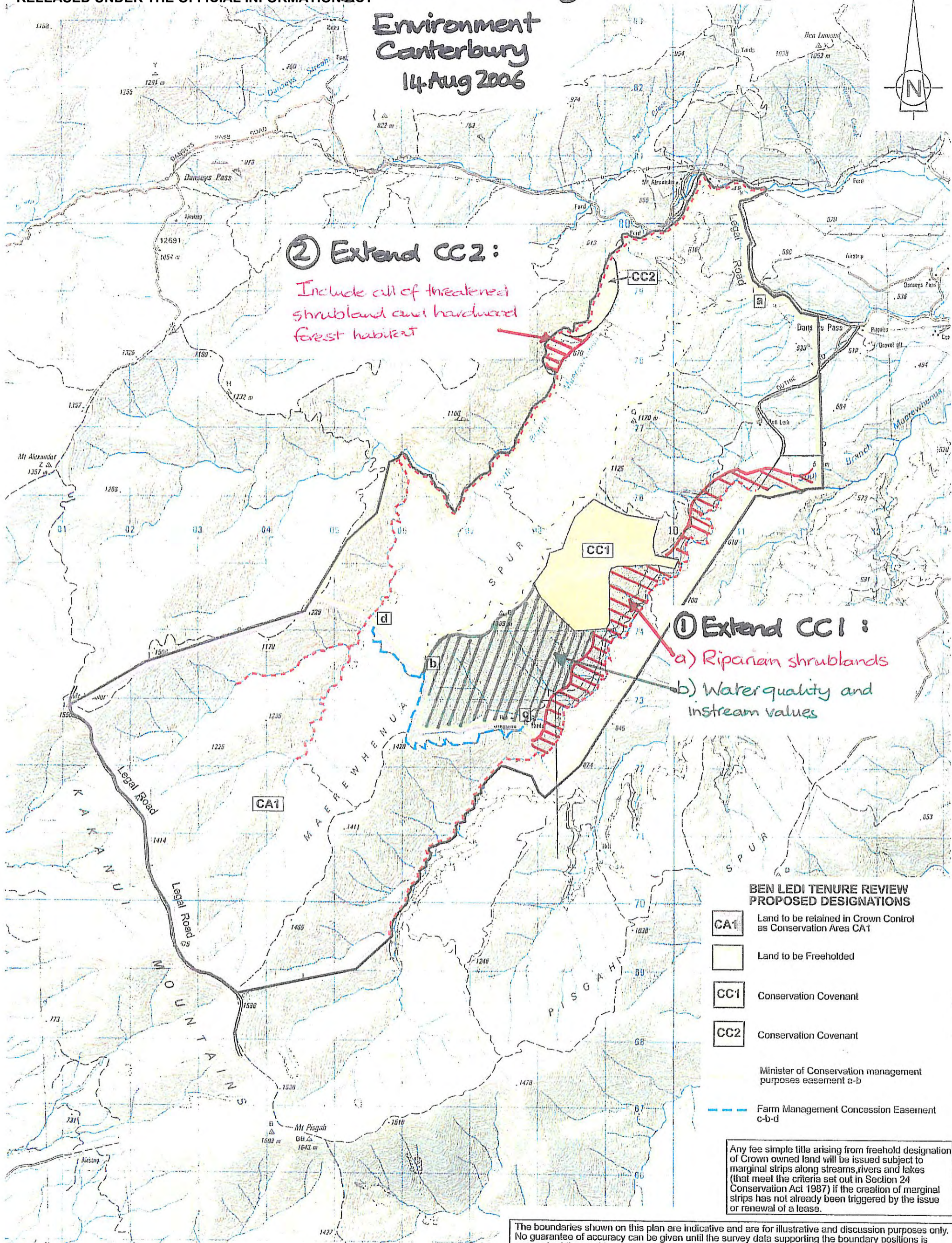
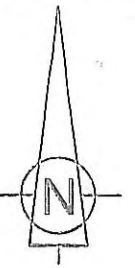


John D Talbot
DIRECTOR OF POLICY AND PLANNING

Attachments:

Ben Ledi Map– showing recommended changes to proposed Designations Plan.

Environment
Canterbury
14 Aug 2006



② Extend CC2:
Include all of threatened
shrubland and hardwood
forest habitat

① Extend CC1:
a) Riparian shrublands
b) Water quality and
instream values

**BEN LEDI TENURE REVIEW
PROPOSED DESIGNATIONS**

- CA1** Land to be retained in Crown Control as Conservation Area CA1
- Land to be Freeholded
- CC1** Conservation Covenant
- CC2** Conservation Covenant
- Minister of Conservation management purposes easement a-b
- Farm Management Concession Easement c-b-d

Any fee simple title arising from freehold designation of Crown owned land will be issued subject to marginal strips along streams, rivers and lakes (that meet the criteria set out in Section 24 Conservation Act 1987) if the creation of marginal strips has not already been triggered by the issue or renewal of a lease.

The boundaries shown on this plan are indicative and are for illustrative and discussion purposes only. No guarantee of accuracy can be given until the survey data supporting the boundary positions is researched thoroughly when the survey prescription is prepared.

Marginal Strip Subject to Sec 24 (9)
Conservation Act 1987



Certified a true copy of the original status check plan

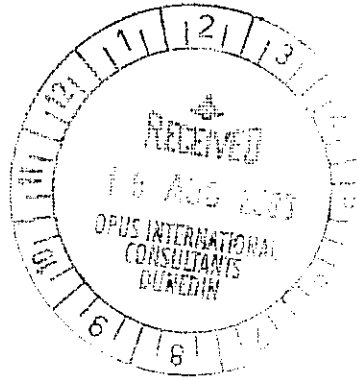
Ben Ledi
Scale 1 : 50000



Version	1	2	3	4	5
Otago Land District	Sheet 1 of 1				
NZMS 260 1.41	Date 13/10/2003				

Graphics by :
TL Survey services Ltd DUNEDIN

Commissioner of Crown Lands,
 C/o David Payton
 Tenure Review Contract Manager,
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**FOREST
 & BIRD
 Dunedin Branch**

PO Box 5793
 Dunedin
 15.8.06

Dear Sir,

**Submission on the Proposed Outcomes from Tenure Review of Ben Ledi
 Pastoral Lease**

**On behalf of the Dunedin Branch Management Committee of Forest and
 Bird.**

This submission is written on behalf of the Dunedin Branch of the Forest and Bird Protection Society which has approximately 565 members with strong interests in botany and natural history in general and in the High Country. Many of the members enjoy active recreation in the back country and are very aware of the need to ensure the protection of natural values, vegetation and landscape, historical sites and to improve public access through the tenure review process.

The submission is written with reference to the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the recently stated government objectives for the South Island high country, especially the following:-

- *to promote the management of the Crown's high country in a way that is ecologically sustainable.*
- *to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.*
- *to secure public access to and enjoyment of high country land.*
- *to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy to progressively establish a network of high country parks and reserves.*

Introduction

The Ben Ledi lease is on the eastern side of the Kakanui Range and is accessible from Dansey's Pass road. It shares its southeastern boundary with Pisgah Downs and the northwest boundary with Mt Alexander. Both the adjoining leases are in the tenure review process. The southwest boundary is a legal road running along the top ridge of the Kakanui Range. It contains outstanding natural landscape and some important areas of remnant vegetation. The top block, destined to become a Conservation Area, has numerous inherent natural values; landscape,

alpine and sub-alpine vegetation, fauna (including Peripatus species). It is potentially an area with many recreational values and I believe will be used more by trampers, botanists and those interested in natural history when legal access becomes available for the public and information on this is freely available.

The Proposal

Conservation Area CA1

2200ha (approximately) to be designated as land to be restored to or retained in full Crown ownership and control as a Conservation Area under Section 35 (2) (b) (i) Crown Pastoral Land Act 1998, subject to a Farm Management Easement Concession.

This area is at the southwestern end of the lease; it extends to the Kakanui Mountains ridge crest and includes the headwaters catchments of both the North and South branches of the Maerewhenua River. It contains a series of wide moderately steep spurs, with some rock outcrops and screes, running from the crest of the Kakanuis. As the Conservation report notes, 'the extensive area of snow tussock grasslands and associated wetland and bluff/outcrop vegetation comprises almost entirely of indigenous vegetation with a high degree of intactness and natural character'. CA1 includes approx. 890 ha of a recommended area for protection, RAP 9, Ben Ledi and also a small part of RAP 10, Nobbler; the PNA assessment rated the areas as of moderate to high importance and we believe this assessment has been more than confirmed by the current Conservation Resources report and the report done by Kelvin Lloyd of 'Wildlands Consultants'. Significant vertebrate fauna have also been identified within CA1. The landscape values are high and once access is secured, there is high potential for recreational use by trampers, botanists and others interested in the natural history and mountain bikers. 85% of the area is rated Class VIIe land, unsuitable for pastoral use and the rest Class VIe with only limited potential for pastoral use.

Forest and Bird fully support the proposal that the area within CA1 be returned to Crown ownership and control to protect the significant inherent ecological and landscape values within it and to provide the opportunity for recreational enjoyment.

Conservation Covenants CC1 (274ha) and CC2 (50ha), a total of 325ha (approximately) to allow protection of predominantly native shrublands and broadleaf indigenous forest.

These two Conservation Covenants are within the 3319 ha proposed for freeholding.

CC1

This approx 275 ha of land is on the steep faces of the dark southeastern side of the mid-reaches of the Maerewhenua Spur. It has snow tussock in good condition and lowland broad-leaved indigenous forest, a valuable remnant of forest formerly widespread in the Kakanui Ecological District. CC1 in fact contains an almost intact altitudinal sequence from sub-alpine tussock grasslands down to tussock grasslands, montane shrubland and lowland forest. The formerly threatened *Olearia bullata* occurs within it along with a new genus of Peripatus (Onychophora), a high priority for protection and conservation. It is proposed that grazing by sheep and cattle be allowed to continue at its present rate.

Forest and Bird fully support the creation of this Conservation Covenant for all the significant values noted above. We appreciated the values of this Covenant on our inspection trip when

we walked the bottom boundary of it. We accept that it is likely grazing could continue without compromising the inherent values of the vegetation. We note the intent to monitor for any unacceptable grazing effects.

CC2 (part of RAP 8)

This comprises approx. 50ha and is part of the lower altitude steep faces of two fenced blocks on the sunny northern faces of the Maerewhenua Spur adjacent to the northwestern boundary of the lease. It has largely intact broadleaf indigenous forest and as for CC1, this is a valuable remnant of forest formerly widespread in the Kakanui Ecological District.

Forest and Bird strongly support the creation of this Covenant to protect the valuable forest remnant within it.

Land Proposed for freeholding

3319ha (approximately) to be disposed of by freehold disposal to the current lessees under Section 35 (3) Crown Pastoral Land Act 1998 subject to Conservation Covenants over two areas and an easement in favour of the Crown for management access.

We accept that this land is suitable for freeholding.

Access Provisions

Access to CA1 and CC1

The only public access to CA1 is from the top of the block and depends on access to the top ridge through Pisgah Downs. We understand such access is proposed under that tenure review which is in progress. The route of possible access from Mt Alexander as an outcome of that review has not been outlined which makes it difficult to judge this issue.

We note that DOC is to have an easement for access for management purposes via the Maerewhenua Spur and as a part of this are to notify the landowner to ensure there is no conflict with the farming operation. *We suggest that foot access only via the Spur track for the general public be allowed also with the proviso that it is cleared with the landowner.*

From discussion with Mr. Ian Anderson we understand that he would not refuse permission for foot access unless there was a conflict with shooters (and we appreciate the safety issues involved) or with farm activity, but we are mindful that should the property change hands in the future there is no guarantee that future owners would do likewise which is why we suggest the above provision.

On our inspection trip we were able to walk sufficiently far up the Spur track to confirm that it is a very pleasant walk on a well-graded track with outstanding views and would provide an enjoyable path to the lower boundary of CA1 and an opportunity to drop down into CC1 which has features that certainly many of our members would appreciate and enjoy. It would allow for a round trip to be made. Access to the lower tongue of CC1 via the marginal strip on the south branch of the Maerewhenua River is not straightforward.

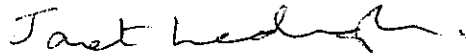
Access to CC2

CC2 has an important remnant of broadleaf forest which we have observed would be difficult to access by way of the marginal strips as there are some major gorged areas. As with CC1, we think this area is likely to be of interest to our members. For the reasons stated above we suggest

that a clause indicating that occasional requests for access to CC2 should be granted where they do not interfere with the farming operation.

Thank you for the opportunity to make this submission on behalf of the Dunedin Branch of Forest and Bird.

We also wish to thank Mr. Ian Anderson for discussion and allowing us to inspect the lease.



Janet Ledingham

On behalf of Forest and Bird, Dunedin Branch

Email janet.ledingham@stonebow.otago.ac.nz

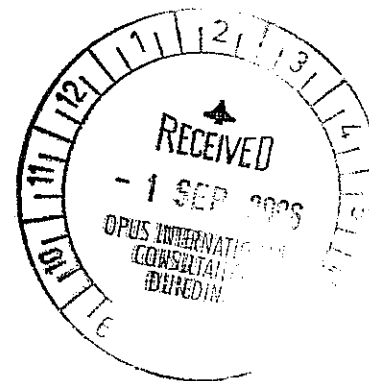


Te Rūnanga o NGĀI TAHU

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30 August 2006

David Payton
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DUNEDIN



Tēnā koe David

Preliminary Proposal for Ben Ledi Pastoral Lease

Te Rūnanga o Ngāi Tahu have analysed the Preliminary Proposal and Ngāi Tahu Cultural Values Report for Ben Ledi Pastoral Lease and note the following points:

- The Maerewhenua River was a traditional 'trail' used by Ngāi Tahu Whānui and the proposed marginal strip provides access for Ngāi Tahu Whānui to walk along this traditional trail.
- The marginal strip on the Maerewhenua River not only provides for access but also provides for protection of the ecological and cultural values associated with the Maerewhenua River.

Please be advised that Te Rūnanga o Ngāi Tahu supports the Preliminary Proposal for Ben Ledi Pastoral Lease.

If you have any questions please do not hesitate to contact me.

Heoi anō

Takerei Norton
Environmental Heritage Advisor
Te Rūnanga o Ngāi Tahu