

Crown Pastoral Land Tenure Review

Lease name: BERWEN

Lease number: PO 209

Public Submissions - Part 2

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

February

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FOREST
& BIRD

ROYAL FOREST AND
BIRD PROTECTION
SOCIETY OF
NEW ZEALAND INC

29th September 2005

The Commissioner of Crown Lands
c/o DTZ Land Resources Division
PO Box 27
ALEXANDRA

Dear Sir

Tenure Review- Po 209 BERWEN - Preliminary Proposal

We thank you for forwarding us a copy of this proposal. We in the Upper Clutha Branch of the Society are very conscious of the importance of the Tenure Review process. We fully support the aims and objectives of Part 2 of the Crown Pastoral Lands Act 1988 and the more recently stated 10 Government Objectives for the South Island High Country as stated in the Cabinet Policy Committee Paper of 5th February 2005.

Our branch has a membership of approximately 160 members; the Society as a whole has a membership of approximately 40,000 and is well known for its work in protecting the environment throughout New Zealand.

We have inspected Berwen at both the north and south end and wish to thank Mr S Croft for allowing us to do so.

1.0 General

In the main we see this as a good proposal and it is most gratifying to see such a large area with many significant conservation values, CA1, being retained by the Crown for conservation and recreational purposes. It is good to see that areas recommended for protection under the PNA survey are at last receiving the protection they deserve, in this case RAP3. Also, a very important outcome of this proposal will be that it adds to the proposed Oteake Conservation Park. This is positive.

We would be pleased if you would accept the following comments and suggested alterations to this Preliminary Proposal.

2.0 Area CA1

There is a distinct and mostly suitable division in this proposal in that the land to the north of the Berwen saddle in the Omarama basin, which is recommended for freeholding, is drier and warmer. That to the south in the Manuherikia basin is dark lying and therefore wetter and colder and less suitable for farming.

The area to the north of the saddle has been developed by over-sowing of seed and topdressing up to about 900m asl. This appears to have produced reasonable pasture. This northern area with careful management should be ecologically sustainable.

Above this altitude however, on the higher southeast corner (particularly over 1100m or so) the cover is markedly poorer, consisting of grazed out fescue and tall tussock with much bare ground vulnerable to frost heave and wind erosion (see Photo 2).

ROYAL FOREST & BIRD PROTECTION SOCIETY OF NEW ZEALAND INC.
UPPER CLUTHA BRANCH

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It is easy to see that farming this part of the Ewe Range is not ecologically sustainable or economically viable. Section 24 Objects of Part 2 of the CPLA 1988 are "*(a) to (i) promote the management of reviewable land in a way that is ecologically sustainable.*"

This is a high altitude, highly exposed and relatively dry environment in which disturbed cover takes a very long time to recover. With continued disturbance through grazing, the cover will continue to decline in this fragile environment and preclude long term recovery of the tall tussock. The character of the area (tall tussock grassland, rock outcrops, native shrub and herb species) is no different to that of CA1 (apart from the obvious degradation in places)(see Photo 1). There is no reason to treat this area differently to CA1 and it should be included in CA1 as the conservation resources report indicates.

This area was formerly recommended to be part of the conservation area because of its large dramatic rock outcrops harbouring remnant shrub species, and tall tussock-subalpine shrub cover (despite its degradation), supporting a valued natural character typical of the South Island high country. It is the only high part of the range underlain by semi-schist.

It is part of the southern backdrop to the Omarama basin and forms, part of the foreground to the higher Hawkdun Range to the south as viewed from SH8 - a very important tourist route between Christchurch and Queenstown.

This corner would be a logical and pleasing entrance to the new Oteake Conservation park, via the "a-b" access to the top of the Ewe Range, providing excellent views out over the Mackenzie Basin. Exploration of the large rock outcrops would also be possible if the area was part of CA1.

This area is the home of NZ falcon (observed on our field trip) and some endangered flora (refer Hawkdun Ecological District Report and the Conservation Resources Report).

Additionally, the existing fence line does not relate well to topography. The proposed division on land would ultimately result in a discordant landscape outcome, with loss of the existing natural character enjoyed by this area. The existing integrity of the landscape is threatened if the existing fence line is persisted with. Significant inherent values would not be protected.

The fence dividing the two areas above S to the boundary fence on the top of the Ewe Range should be shifted down to a lower contour. This is proposed to follow a visually logical line around the base of the bluffs (see Photo 3 and map).

We also have reservations about the positioning of the new fence S-T. While we see it being designed to shorten the journey for the shifting of stock from the home block to CC2 via the easement g-h, it will also with the transference of fertility upwards, result in a sheep camp at a rather high point on the property. This is visually undesirable (see Photo 4). The existing landscape integrity would be broken down by visual fragmentation of the landscape. The contour fence would result in a very unnatural division of the long hill slope.

This area is an important visual focus from the Broken Hut Road – a important recreational route. Retention of the existing natural character and landscape integrity is important.

We would prefer this proposed fence be shifted north down the spur to a point nearer the creek bed (see attached Photo 4 and map).

3.0 Area CC1

Comparatively low altitude areas of woody vegetation such as this are becoming increasingly rare and we fully agree with the proposal that this area be given protection. The area consists not only of mature matagouri but several other shrub species which are becoming endangered. We find the proposed boundaries suitable.

We have concerns however about the ability of the draft covenant to protect the values present and suggest the following:

- i cattle should be excluded because they physically damage wet areas and woody vegetation through trampling, pugging and browsing
- ii a suitable monitoring programme should be set up to enable the effectiveness of the covenant to be measured, in particular whether continued sheep grazing is permitting regeneration. A covenant is of very limited value unless it permits the native species to reproduce in perpetuity.

4.0 Area CC2

We note the conservation resources report recommends that this whole area CC2 be returned to the Crown for its ecological values.

Lying at the head of the Manuherikia valley as it does and at the foot of the Hawkdun range to the east, this area has very significant inherent conservation values especially so in its landscape. The area as a whole as a high level of landscape integrity and natural character despite the more modified nature of the CC2 area.

The tall tussock is one of the main ingredients in this landscape; it gives it its colour and texture and if this is damaged or lost that landscape will be destroyed. A special feature of the Manuherikia valley is the presence of tall tussock down on the valley floor. This underlies a particular sense of remoteness and "back country" which is fast disappearing in many high country landscapes.

There are vulnerable (*Carmichaelia vexillata*) and naturally uncommon (*Olearia intertexta*) shrubs present in gullies within this area.

We note that in the covenant SCHEDULE 2, Special Conditions - Manuherikia Catchment:

"The monitoring programme will be reviewed at 3 yearly intervals and if in the view of the Minister there is a deterioration in the condition and extent of the ecological conditions the minister reserves the right to adjust stock numbers and conditions for the covenanted area."

In the proposed covenant for this area it is stated that 1.7 stock units may be grazed on the area, being sheep or cattle only. In view of the fact that the tall tussock is already becoming de-graded and that cattle are the main cause of this, we believe that cattle should be excluded from the area right from the start as they are the ones that will cause the most damage. We have all now had over fifty years experience in top-dressing and over-sowing of tussock country, so there is ample evidence to support this contention.

The tall tussock is also important to this catchment as the waters from it are used extensively for irrigation all the way down the Manuherikia valley. It has been amply demonstrated elsewhere that tall tussock should be kept intact for water retention purposes. If this capability is lost to this area the land being supplied with water down valley suffers.

While the proposal states that there is an ecological altitudinal sequence from the valley floor to the top of the Hawkdun Range, in our opinion this is not so, as the eastern boundary fence of this area is well above the valley floor. The sequence is incomplete. Further down the valley in the Blackstone Hill and Two Mile tenure reviews, together with the proposed Home Hills and Braeside reviews, the water race is being used as the boundary between that land to be freehold and that to be returned to the Crown for protection - under the circumstances this is a very suitable line. In this proposal the designation line and fence goes well above the water race level; it is discordant with the rest of the valley.

The existing fence line is not a desirable line visually. Persistence with this line would ultimately result in a discordant landscape outcome, with loss of the existing natural character enjoyed by this area. The existing integrity of the landscape is threatened if the existing fence line is persisted with.

The exiting proposal would also preclude the public being able to explore the interesting red rock outcrop.

We would suggest that the present fence on the east side of the block be removed and that the whole area CC2 be reduced in size. We suggest the boundary to be from the inlet of the water race to a point in the fence directly above the weir, on the spur to the west (see enclosed map). Having a fading scar from the old fence line and track at the foot of the Hawkduns would be more preferable than having a green line at the edge of the pasture below.

5.0 Access

We note from the Designation Plan (appendix 1 of the proposal) that there is a legal road running the full length of the western boundary and that the only part formed on Berwen is that part between the entrance to Twinburn and the airstrip on Berwen.

Access "a-b" for the public to access the top of the Ewe Range is a good and reasonable proposal and we fully endorse this.

The easement "c-d" for the public starts up a very steep face and runs alongside a fence to the proposed conservation area CA1, at the base of the Hawkdun Range. We find this unreasonable when there is a well formed and benched track some few hundred metres to the north, starting at "f" on the legal road.

In the many tenure review proposals we have been involved with, the practice of making an easement available for the public alongside a boundary fence is being resorted to all too often. We find this practice unacceptable when the route is exceedingly steep - reasonable access should be provided "*for the public to enjoy*". We cannot see any real justification or advantage for the proposed route in this proposal.

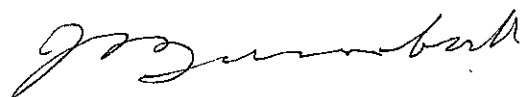
6.0 Conclusions

If the suggestions we have made in this submission are adopted we see a very good outcome to this change in the tenure of Berwen.

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We thank you for the opportunity to make this submission and we await with interest the outcome.

Yours faithfully

A handwritten signature in black ink, appearing to read "John L. Turnbull and Anne Steven". The signature is cursive and somewhat stylized.

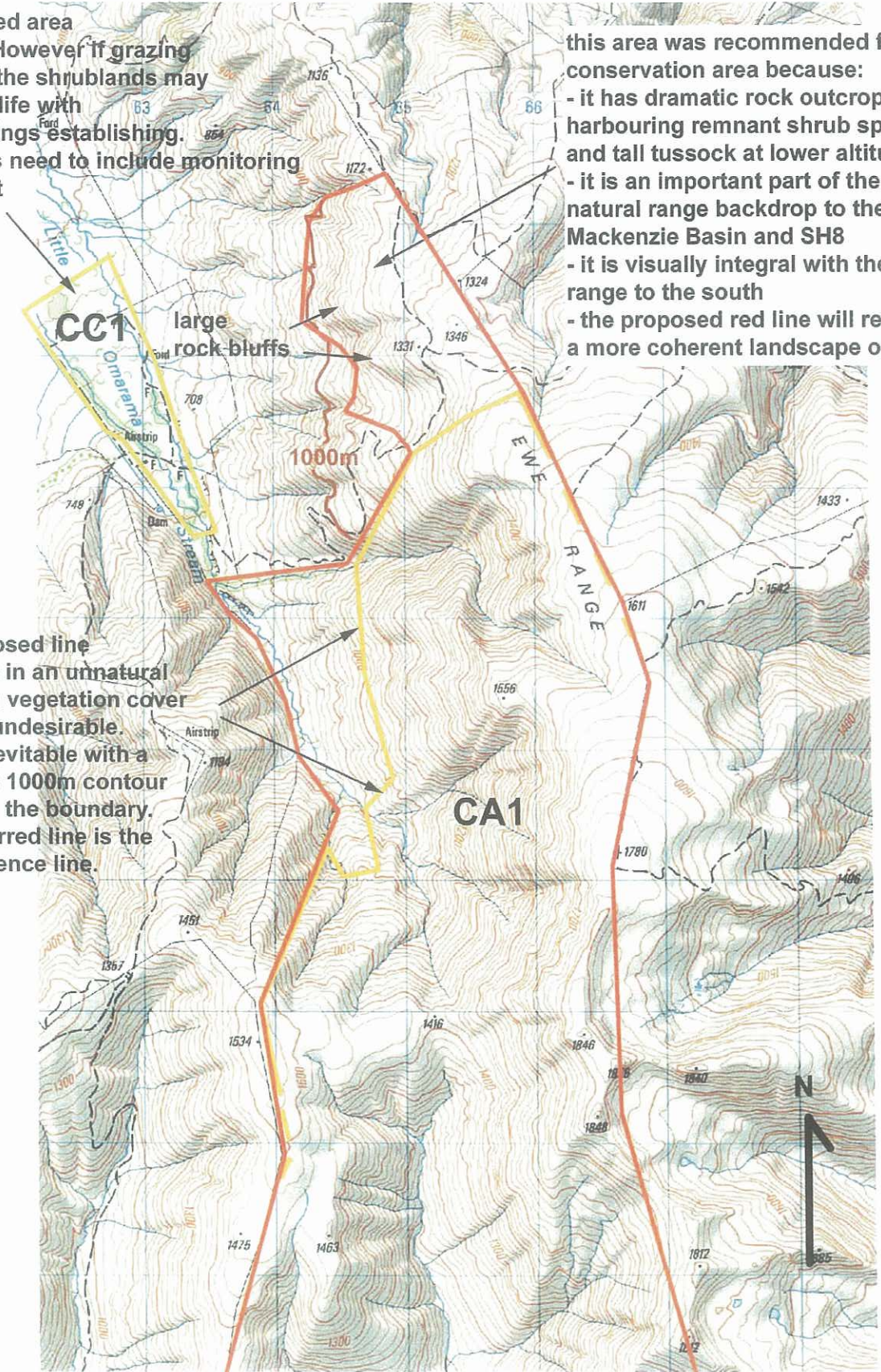
John L Turnbull and Anne Steven
for Upper Clutha Branch

Maps and Photos attached

This covenanted area is supported. However if grazing is to continue the shrublands may have a limited life with few new seedlings establishing. The conditions need to include monitoring for recruitment

this area was recommended for conservation area because:
- it has dramatic rock outcrops harbouring remnant shrub species, and tall tussock at lower altitude;
- it is an important part of the more natural range backdrop to the Mackenzie Basin and SH8
- it is visually integral with the range to the south
- the proposed red line will result on a more coherent landscape outcome

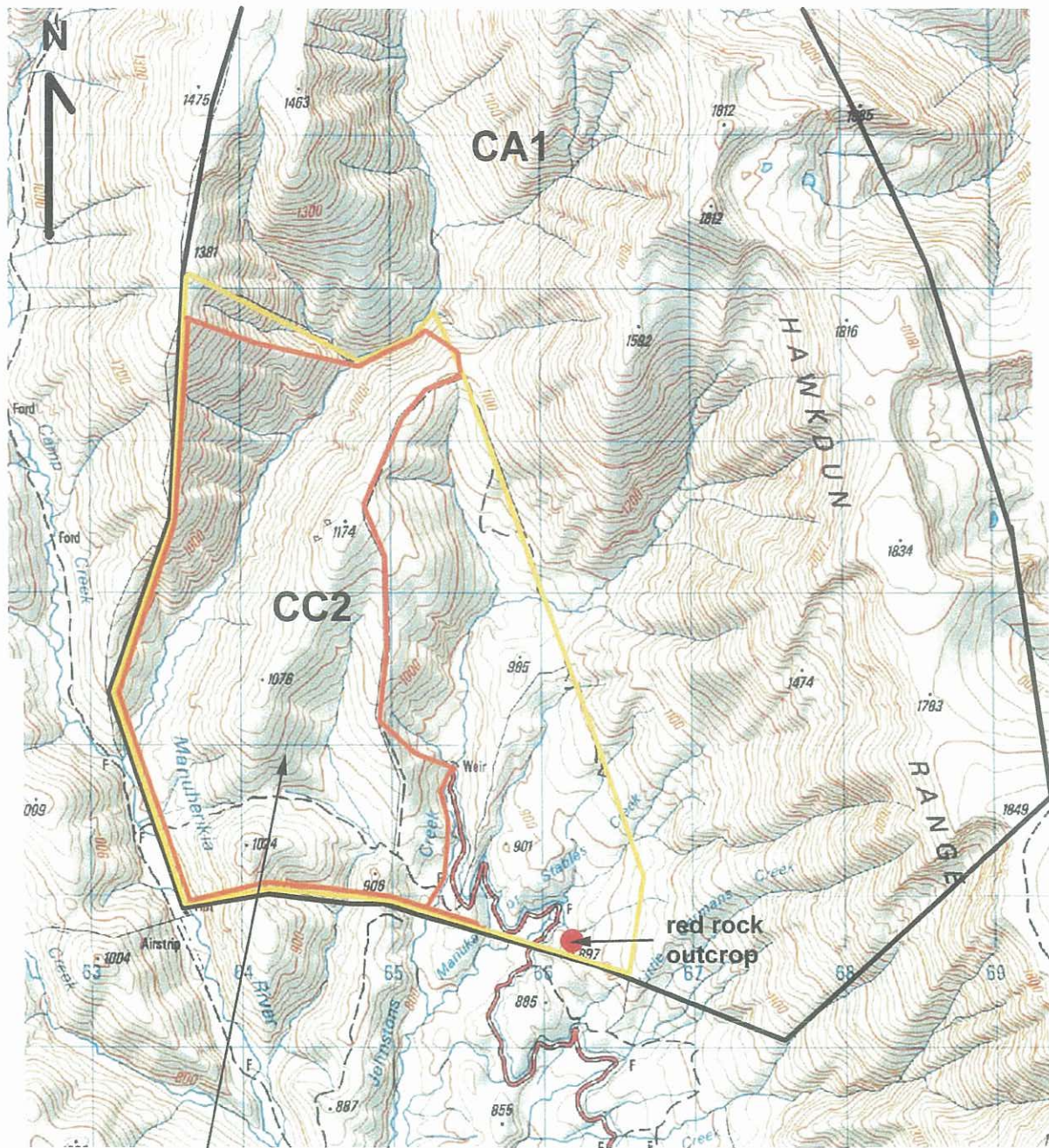
this proposed line will result in an unnatural change in vegetation cover which is undesirable. This is inevitable with a simplistic 1000m contour choice as the boundary. The preferred line is the existing fence line.



REVIEW OF PRELIMINARY PROPOSAL FOR BERWEN PASTORAL LEASE

prepared by
Anne Steven Landscape Architect
for Upper Clutha Branch of Forest and Bird Society

September 2005



A covenant over the freehold Manuherikia block is supported in principle. The proposed boundary merely follows an existing fenceline rather than a more natural line following topography. With different management this line will become obvious which is not desirable. The red line would provide for a more coherent landscape outcome. Stock should be limited to sheep only. Grazing also needs to be such that the regenerative capacity of the tall tussock and shrub communities is enabled.

REVIEW OF PRELIMINARY PROPOSAL FOR BERWEN PASTORAL LEASE (Manuherikia block)

prepared by
Anne Steven Landscape Architect
for Upper Clutha Branch of Forest and Bird Society

September 2005



tall tussock grassland on the proposed freehold in large west facing basin below track

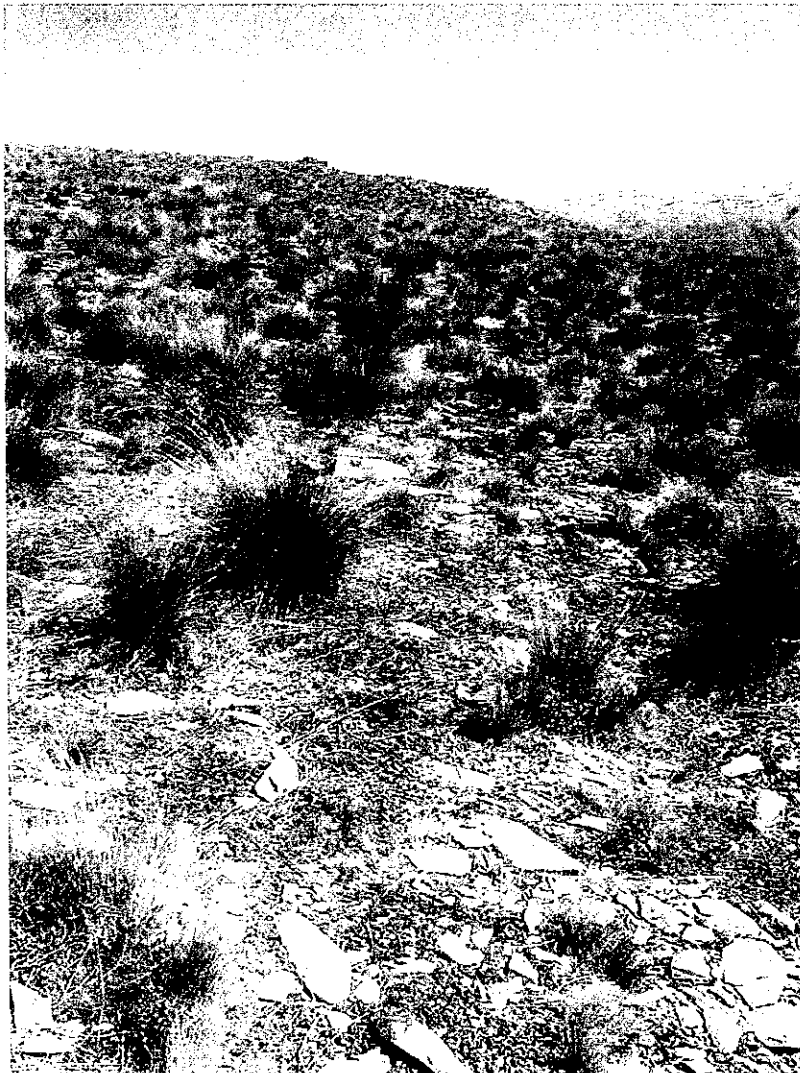


Photo 1. The higher altitude land on the proposed freehold is similar in character and ecological value to the land in the proposed CA1. There is no basis for different management regimes.

The areas have equal significant inherent values which deserve equal protection.

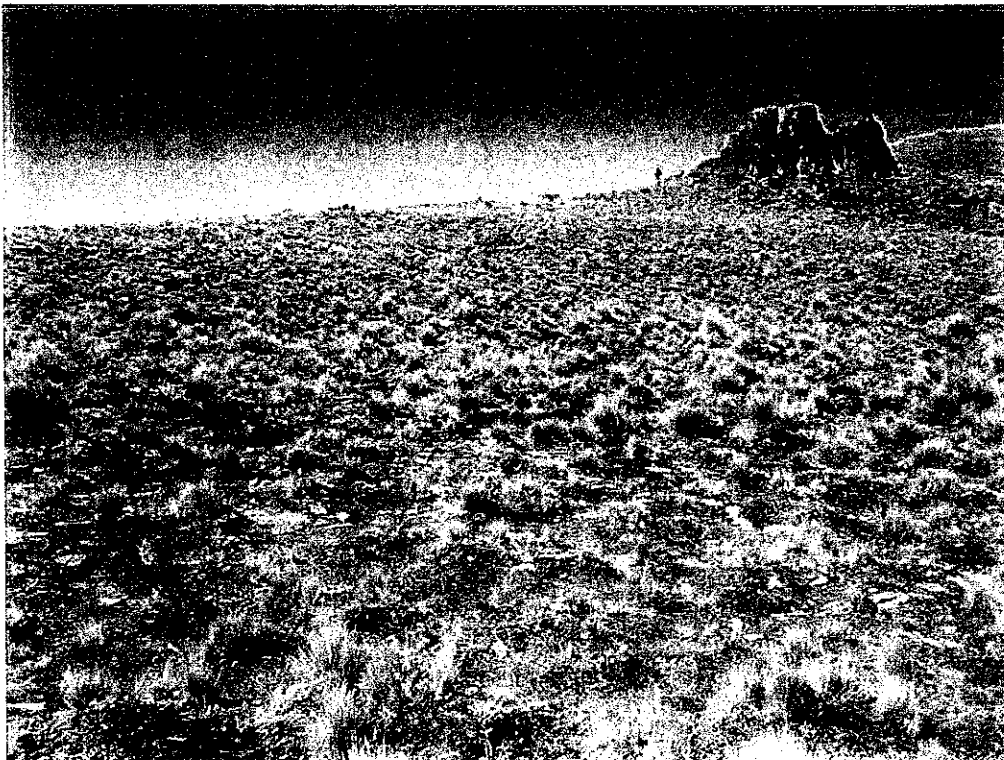
(photos taken by Anne Steven on 25 September 2005)

tall tussock grassland on the proposed CA1



Severely degraded tall tussock grassland at around 1420m altitude on the proposed freehold area.

Photo 2. The land at the top end of the proposed freehold on the Ewe Range could not be farmed in an ecologically sustainable way. It is high altitude (up to 1420m altitude), relatively dry and north and west facing, and very exposed to high winds and dessicating conditions. Recovery of the tall tussock and subalpine shrub community would be prevented by continued grazing, especially in the absence of fertilizer (uneconomical to apply on this sort of country). This area is similar in character to that of the proposed CA1 and should be included in it. (photos taken by Anne Steven on 25 September 2005).



Degraded tall tussock (converted to short tussock) on the proposed freehold at 1340-1360m altitude



Photo 3. Proposed boundary between conservation land and freehold land

The higher black line to the right is an existing fenceline. It is the proposed boundary between freehold and conservation land in the Preliminary Proposal. The dark green line is the recommended boundary between freehold and conservation land. It runs approximately along the 1000m contour (or higher), the usual limit for AOSTD improved pasture (because growing conditions above this altitude are limited).

Relief from grazing through retention in public ownership as conservation land would permit the opportunity for the recovery of the tall tussock lands. Continued grazing of the unimproved higher altitude tall tussocklands will inevitably degrade them over time to the point of no return. The recommended fence line would retain the large dramatic rock outcrops, talus patches and subalpine shrub species within public conservation land thus securing public access and enjoyment of this high country landscape.

The recommended fence line follows a logical line through the topography, skirting the base of the rock bluffs. This would better retain the integrity, visual coherence and natural character of the landscape.

(photo taken by Anne Steven 25 September 2005)

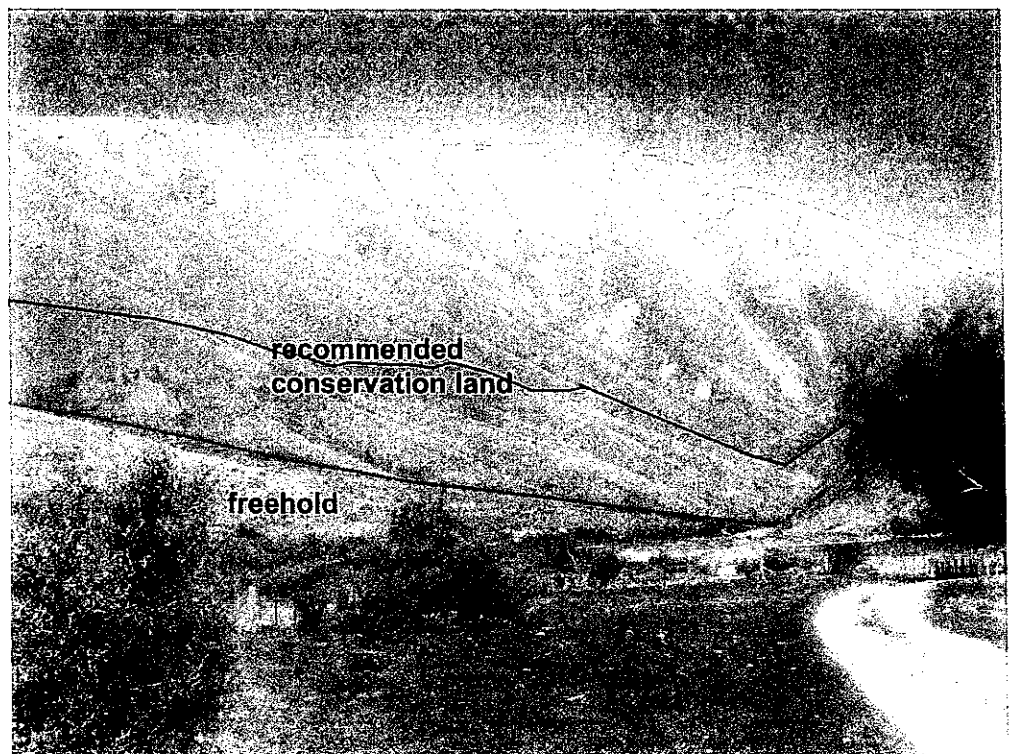


proposed boundary between conservation land and freehold (green line). Black line is property boundary. Orange line is the preferred line.

Photo 4.

The proposed freehold-conservation land boundary will result in undesirable fragmentation of the landscape, which currently has a high degree of intactness and coherence. This would result from intensified grazing with subsequent loss of tussock cover and increase in green exotic cover in contrast.

The long planar valley side slopes do not lend themselves to contour fencing. To avoid visual fragmentation and loss of valley floor to range top sequence, most, if not all the land south of the existing fence should be retained as conservation land.



proposed boundary (green) between conservation land and freehold, true right of Little Omarama Stream. Orange line is the preferred line.

(photos taken by Anne Steven 25 September 2005)