

Crown Pastoral Land Tenure Review

Lease name: CAMBRIAN

Lease number: PO 375

Public Submissions - Part 1

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

April

07



OTAGO CONSERVATION BOARD

Our ref: SBC-08-34

29

28 March 2006

Commissioner of Crown Lands
c/- DTZ New Zealand Ltd
Land Resources Division
Box 27
ALEXANDRA

Dear Sir

SUBMISSION ON TENURE REVIEW OF CAMBRIAN PASTORAL LEASE

Thank you for the opportunity to comment on the Preliminary Proposal for the tenure review of the Cambrian Pastoral Lease.

The Otago Conservation Board supports the following aspects of the preliminary proposal:

- the designation of about 1 ha as land to be restored to Crown control as a conservation area;
- the proposed conservation covenants CC1, CC2 and CC3 to protect remnant shrublands.

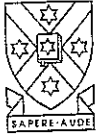
The board believes that public access is the major conservation issue on this property and that the proposal should be changed as follows:

- ideally, the existing vehicle track up Donald Stuarts Creek (or an alternative practical foot and mountain bike route solely within this property) should be made available for public access;
- alternatively, suitable public access along the southwest boundary of the property should be negotiated. Good foot, horse and mountain bike access to public conservation land which is higher on the Dunstan Mountains than this property is very important, but the proposed easements will be effective only if the Lauder tenure review proceeds satisfactorily. In the meantime, the board considers that it would be risky to not aim for public access through the Cambrian pastoral lease.

We appreciate the opportunity to provide comment on this proposal and we are willing to elaborate on any of the issues we have raised.

Yours faithfully

Fergus Sutherland
Fergus Sutherland
Chairperson



Department of Botany

University of Otago
Te Whare Wananga o OtagoDivision of Sciences
PO Box 56, Dunedin
NEW ZEALANDTel: National 03 479 7573 International 64 3 479 7573
Fax: National 03 479 7583 International 64 3 479 7583
Email: amark@otago.ac.nz

March 29, 2005.

The Commissioner of Crown Lands,
c/o DTZ New Zealand Ltd.,
PO Box 27,
ALEXANDRA.**SUBMISSION ON PROPOSED TENURE REVIEW:
CAMBRIAN PASTORAL LEASE**

Dear Sir,

Thank you for sending me a copy of this proposal and I appreciate the opportunity to comment on it, based on my very good knowledge of the area involved, gained over many years of ecological research on the upper slopes of this property, now formally protected as the ~1500ha Lauder (Northern Dunstan) Conservation Area. We have normally accessed this Conservation Area through Cambrian Station with the permission of the previous and current lessees.

I have read this proposal carefully and generally approve and endorse it, bearing in mind that some 1500 ha has already been excised in order to protect extensive areas of excellent quality slim snow tussock grassland plus high-alpine cushionfield which contains some alpine plant species with very limited distributions.

With the present proposal, the total area of leasehold, 982 ha, is to be largely freeholded but with some significant areas of montane shrubland to be covenanted. Only one hectare is to be restored to full Crown ownership and control, being a small part of a much larger area involving the contiguous properties of Lauder, Cambrian Hill and Cluden Pastoral Leases which it is intended to eventually formally protect if and when these properties go through tenure review.

The remainder of the existing property, 980 ha, is proposed for disposal by freehold, subject to conservation covenants under sections 40(1)b, 40(2)a, and 40(2)b of the CPL Act over some 25 ha (CC 1 and CC 2), plus an additional area of about 2 ha (CA 3) being designated to protect areas of remnant mixed shrublands (kanuka, manuka, matagouri, coral broom, *Carmichaelia petriei*, *Olearia lineata*, *O. bullata*, *Coprosma propinqua*, together with narrow-leaved snow tussock). These mixed shrublands are still developing (pers. obs.), increasing in both density and diversity, and moreover, represent a type that is now relatively rare in the Dunstan Ecological District, largely because of burning and land development. The first two proposed covenants only, are to be fenced, while the third is said to be largely naturally protected, and therefore will not be fenced. The intention is to exclude stock from all three areas, with some additional constraints (no burning, etc.), which I applaud and strongly endorse. It contrasts with most covenants designed to protect areas of indigenous woody cover in most previous tenure reviews. The planned photographic monitoring of the vegetation condition and landscape values of the three covenants is also applauded and supported. The proposed boundaries for the two larger areas intended for covenanting CC 1 and CC 2, as shown on the map accompanying the proposal, are clearly artificial straight lines, whereas the shrublands currently extend further upslope to rather ill-defined upper limits as they continue to extend and thicken through natural succession. It would be preferable to have at least one of these

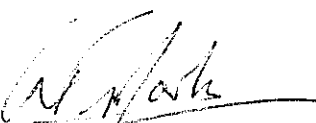
areas, preferably CC 1 to extend further upslope, much closer to the existing 4WD track near the western boundary of the property where several indigenous shrub species are now establishing. This would allow the succession to continue upslope, as it undoubtedly would, while also gaining in biodiversity over time, as a function of continued succession to a woody cover. This would add greatly to the potential value of the covenant.

While the preferred procedure to assure protection of significant inherent values, contained in the CPL Act, is the return of such areas to full Crown ownership and control, there appears to be particular circumstances in these cases, to accept the use of conservation covenants with associated exclusion of grazing stock. Of concern, however, is the absence of provision for public walking access to each of the three areas, and it is recommended that this be considered with the use of easements from the closest proximity of the existing track which leads to the existing Lauder (Northern Dunstan) Conservation Area in the upper Lauder basin. An extension upslope of the CC 1 proposed covenant would make it much more accessible to the public from this track, assuming an easement to provide for this is included in the final proposal.

The proposed easements (a-b and c-d) to provide public foot, horse and non-motorised vehicle access, plus vehicle access for conservation management, over those parts of the route from the St Bathans Loop Road to the Lauder Basin Conservation Area and to the greater Northern Dunstan Mountains, generally, that are within the present Cambrian Run, are strongly endorsed. It is assumed that the remainder of this valuable and important access will be provided for when the adjacent Lauder Pastoral Lease completes tenure review. As recommended above, this easement should be extended along the existing 4WD track into the Donald Stuarts catchment, so as to provide public access to the upper edge of the proposed covenant CC 1 (which hopefully will be extended upslope from the boundary currently shown, as has also been recommended above).

I thank you for the opportunity to comment on this proposal.

Sincerely,



Alan F. Mark FRSNZ Emeritus Professor.

The Commissioner of Crown Lands
C/- DTZ New Zealand Ltd,
Land Resources Division
PO Box 27
Alexandra



**FOREST
& BIRD**
Dunedin Branch
PO Box 5793
Dunedin
30.3.06

Dear Sir,

I enclose this submissions on the preliminary proposal for Cambrian Station on behalf of the Dunedin Branch of Forest and Bird

Thankyou for the opportunity to make submissions on this lease.

Yours sincerely

Janet Ledingham

For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society

Email janet.ledingham@stonebow.otago.ac.nz
622 Highgate, Maori Hill, Dunedin. Phone 03 467 2960

Submission on the Preliminary Proposal for the Cambrian 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 made on the basis of recent inspection trips to the neighbouring leases, Cambrian Hills and Lauder, and on knowledge of the area. It 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

For this lease of 982 hectares it is proposed that there be one Conservation Area of 1 hectare, two small Conservation Covenants CC1 and CC2 which will be fenced and a third Conservation Covenant of approximately 2 hectares, unfenced. It is proposed that approximately 980 hectares will be freeholded.

Description of proposed designations

1. Conservation Area

This land is to be restored to full Crown ownership and control as a conservation area under section 35(2)(a)(i) CPL Act: Area: 1 hectare approximately

It contains a significant peat bog; part of a much larger wetland complex and tussock grasslands (which is spread over Cambrian, Lauder, Cambrian Hills and Cluden). The small part of this complex that is on the Cambrian lease is an important component of the wetland, which is in particularly good condition and according to the Conservation Report, supports a number of invertebrates.

We support unreservedly the return to Crown Control of this important part of the wetland and look forward to its full protection on the completion of the reviews for the other leases.

However, there appears to be no easement for access to it, other than an approach from the Lauder Conservation area near point X on the designations plan.

2. Conservation Covenants CC1 And CC2 **under sections 40(1)(b), 40(2)(a) and 40(2)(b) CPL Act**

These proposed covenants comprise two areas adjacent to Donald Stuarts Creek of predominately native shrubland and contain a range of vegetation types including kanuka, manuka, matagouri and Halls totara. The Halls totara remnants are particularly worthy of protection.

We strongly support the creation of these covenants, which will be fenced off and protected from grazing thus creating the opportunity for further regeneration to occur, but note that there does not appear to be any easement for access to the two covenants and strongly suggest that foot access should be made available so that the public can appreciate these covenanted areas. (see under 'Access' below for a suggested solution).

3. Conservation covenant CC3 **under sections 40(1)(b) and 40(2)(a) CPL Act (CC3):**

This is an area of approximately 2 hectares of regenerating shrubland on a steep rocky bluff. The area is not to be fenced; it is stated that the nature of the terrain and the vegetation will largely limit any grazing by stock.

We support the creation of CC3 but regret that it is probably not practicable to fence this covenant area. As with CC1 and CC2 we suggest that an easement for public foot access be included.

4. Proposal to freehold ; - Land to be disposed of freehold disposal to the holder under section 35(3) CPL Act) subject to protective mechanisms and a qualified designation: **Area: 980 hectares approximately**

This land comprises low altitude predominately Class VI land which is suitable for ongoing pastoral use. However we strongly suggest that there be a burning and spraying ban in perpetuity over the area of Donald Stuarts Creek around CC2, CC2 and CC3, both to protect the covenants and the other significant shrubland in the valley not included in the Covenants.

We have no objection to this proposal to freehold , but note the covenant conditions imposed to protect the shrubland within CC1,2 &3 within the freehold area
Burning and spraying should be banned in the area of Donald Stuarts Creek around CC2, CC2 and CC3.

Access Provisions

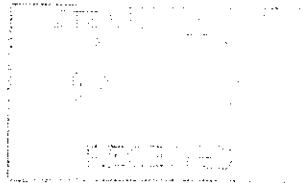
Apart from the lack of access into the three Conservation Covenants, we support the access provisions 'a-b' and 'c-d', with expectation that the route up the spur between 'b' and 'c' will be completed through the Lauder review process.

We strongly suggest however that an easements should be created into Donald Stuarts Creek valley to provide foot access to the three Conservation Covenants, CC1, CC2 and CC3. This could best be done by creating a new foot access easement from 'c-d' on the true right of Donald Stuarts Creek at GR 492 839, down the dotted marked track to GR499 835 where it hits the fence that runs down to point C on CC1

Janet Ledingham, 30.3.06

For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society.

41 Glencarron St
ALEXANDRA
Phone 03 448 7474
E-mail jdouglas.alx@xtra.co.nz



2nd April 2006

The Commissioner of Crown Lands
C/o DTZ (NZ) Ltd
Lands Resources Division
PO Box 27
ALEXANDRA

Dear Sir / Madam

CAMBRIAN TENURE REVIEW – PRELIMINARY PROPOSAL

I would be pleased if you would accept this submission. It's a good proposal except for that of access.

ACCESS.

The present access to the northern end of the Dunstan Mountains so as to get to the Lauder Conservation Area then over to Cluden station is by vehicle access by the generosity of the owners when asked.

The common route across the North Dunstan Mountains to view the landscape, flora and fauna takes a day, even with the use of a **vehicle**. Walking via the proposed easement will be of a climb of over 1,000m and take 3-4 hours even for a fit and above average person. Once at the top, it's then about time to turn around and come on back down.

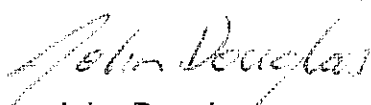
For the majority of the public this is not something that can be achieved – lack of fitness, physical disabilities or health problems.

The Crown Pastoral Act 1998, Part 2. para 24, Objects Part 2, (c) (i) "to make easier---- the securing of public access to and enjoyment of reviewable lands. (Copy attached.)

There is no enjoyment in climbing to a top of a mountain, often in the hot sun, taking 3-4 hours, leaving little or no time to enjoy the reserve and then having to descend back to the starting point.

By providing for vehicle access, more of the public will be able to enjoy / appreciate more of the Crown Land administrated by DOC. A vehicle will take less than an hour to reach the summit and walking about will be less strenuous than having to ascend / descend.

Yours faithfully


John Douglas

CROWN PASTORAL LAND ACT 1998

PART 2 TENURE REVIEWS

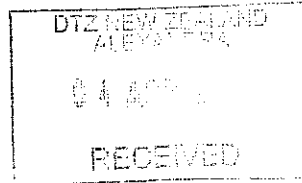
General - 24. Objects of Part 2

24. Objects of Part 2—
The objects of this Part are—

- (a) To—
 - (i) Promote the management of reviewable land in a way that is ecologically sustainable;
 - (ii) Subject to subparagraph i, enable reviewable land capable of economic use to be freed from the management constraints (direct and indirect) resulting from its tenure under reviewable instrument; and
- (b) To enable the protection of the significant inherent values of reviewable land—
 - (i) By the creation of protective mechanisms; or (preferably)
 - (ii) By the restoration of the land concerned to full Crown ownership and control; and
 - (c) Subject to paragraphs (a) and (h), to make easier—
 - (i) **The securing of public access to and enjoyment of reviewable land;** and
 - (ii) The freehold disposal of reviewable land.

CENTRAL OTAGO RECREATIONAL USERS FORUM

The Commissioner of Crown Lands
c/o DTZ New Zealand Ltd,
P. O. Box 27,
ALEXANDRA



2 April 2006

Submission to Preliminary Proposal, Cambrian Pastoral Lease Tenure Review.

Dear Sir,

I am writing on behalf of the Central Otago Recreational Users Forum which is an organisation created to deal between the private persons, clubs and groups (non-commercial, non-urban) who use the public lands of Central Otago for outdoor recreation; and the managers of that land, being the Department of Conservation, the Central Otago District Council, and Land Information New Zealand.

We have 50 member groups comprising many hundreds of individuals and covering most types of outdoor recreation.

Because the organisation is a voice for a diverse group of user interests it has no single focus on issues, but rather attempts to provide a two-way communication between the recreational users of public land and the statutory managers of the same. Access to public land is possibly the one unifying interest that we have, but given the diversity of types of recreation involved, is not in itself a single issue.

We are also interested in treating with respect the needs of farmers and other private landowners who are caught up in the equation of access and potential use.

We appreciate the opportunity given to inspect the property in question, and to submit to the Review of the Cambrians Pastoral Lease.

SUBMISSION

The Central Otago Recreational Users Forum wishes to focus on the issue of access.

General description of proposal

1 (i) Qualified designation (a) An easement in gross under section 36 (3) (b) CPL Act for public foot, horse and non-motorised vehicle access, and for vehicle access for management purposes over existing vehicle tracks on routes within the property to provide access to adjacent conservation areas

These routes are shown as 'A-B' and 'C-D' and indicated by a broken orange line on the plan attached as Appendix 2.

We appreciate that this Review is of Cambrians Pastoral lease, and can be dealt with in those terms only. However we also see that the Dunstan Mountains as a whole, north and south, are a highly significant area, and offer opportunities for integrated access routes that could be among the most treasured in Central Otago.

We propose that public access to the summit ridge in Cambrian Station and Lauder Tussock Reserve be via the existing farm roads, (*"shown as 'A-B' and 'C-D' and indicated by a broken orange line on the plan attached as Appendix 2."*)

This is a good road opening onto a hard-rock surface on the tops, and could readily be maintained via minor annual repairs to the steeper lower portion.

The route should be signposted, and would have parking provided, and signposting to indicate the limits of the easement.

The route would be open to foot, mountain bike and horse access as proposed.

The route would be open to motorised access for part of every year, in the months of December, January, February, March, and in April weather permitting: being after lambing, and before winter.

Users would be asked to respect the right of the farm to deny access during the weeks of the lambing / calving period. This is a courtesy that is already practised by many of our members, that removes a source of anxiety and potential conflict between the private landowner and those who wish to use the farm track easement for access. We believe that it is a reasonable and necessary courtesy.

In order to preserve the quality of the track for the enjoyment of all, the route would be closed to motorised access outside of the nominated months.


We would accept a system of 'registering' to use the road for motorised transport – on the same principle that one would apply for a fishing licence - with a vehicle-barrier gate on the easement track, and a key collectable from DoC Alexandra, with a suitable deposit to be paid and refunded. Bookings could be implemented via the DoC web site to save on administrative costs. Vehicle users who fail to respect the special environment of the ridge top and Lauder Tussock Reserve would not have their permission to visit renewed.

We see this proposal as a "care and responsibility" type of use that gives access to a very special area by a means that doesn't discriminate for just one group of recreational users, that keeps account of what motorised vehicles are in the area and when, and allows for a learning process about how such high country conservation blocks may be enjoyed without harm.

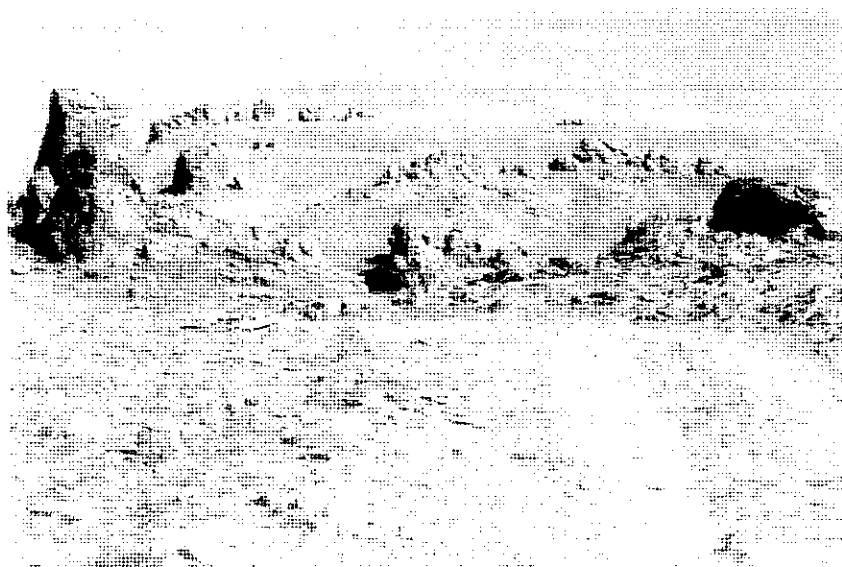
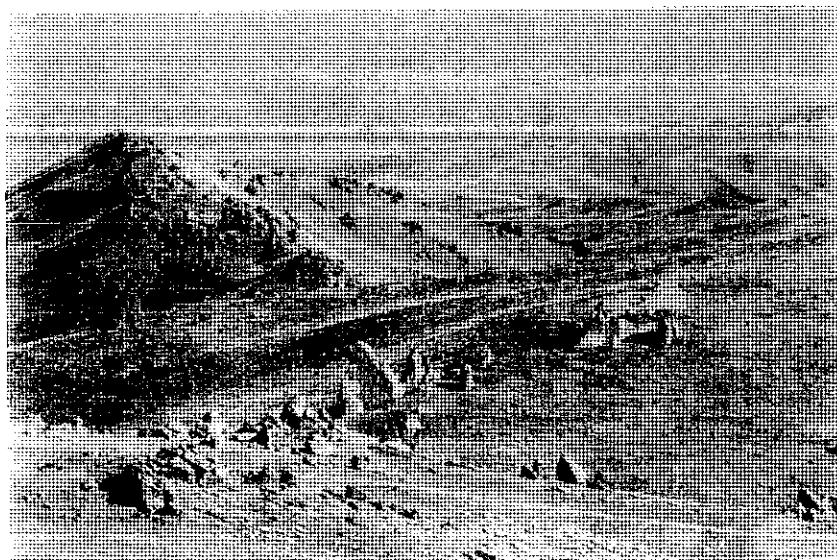
The securing of public access to reviewable land is a significant part of the Act, as in *General, 24. 2, The object of this part are - (c) Subject to paragraphs (a) and (b), to make easier (i) the securing of public access to and enjoyment of reviewable land.*

The proposal that access should be open only to non-motorised types of use is discriminatory, and denies enjoyment of the high country to a considerable portion of the public, especially to those who could not otherwise get to such areas, for reasons of health, age or disability. It is our contention that public land should be made accessible to the public, and that ways may be devised to make that possible in a responsible and rewarding way.

Yours faithfully,
Jan Kelly


Secretary
Central Otago Recreational Users Forum
186 Faulks Road, RD 2, Wanaka 9192

Examples of the hard-road surface on the highest portion of Cambrian Station.
Photos Jan Kelly.





**FOREST
& BIRD**

Royal Forest and Bird
Protection Society
of New Zealand Inc

1st April 2006

The Commissioner of Crown Lands
C/o DTZ Land Resources Division
PO Box 27
ALEXANDRIA

Dear Sir

CAMBRIAN - Po 375 Tenure Review Preliminary Proposal.

We thank you for forwarding to us a copy of this proposal. We in the Upper Clutha Branch of the Society are very conscious of the importance, and have considerable knowledge of, the Tenure Review process, as the "Uplands" in our area are still mostly Pastoral Leasehold Land. Our branch has a membership of approximately 150 members and the Society as a whole has a membership of approximately 38,000 and is well known for its work in protecting the environment throughout New Zealand.

We fully support the Crown Pastoral Land Act 1998 and also the complementary objectives to that Act announced last year (please refer to EDC Min 5/3; CAB Min (03) 11/5). These are:-

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

We would be pleased if you would accept this submission on Cambrian.

1. General:

- * This property comprises most of the catchment of Donald Stuart's Creek and some of its headwaters. Most of the headwater basin is in the neighbouring Lauder pastoral lease which is also in Tenure Review. The very top part of the basin is part of the Lauder tussock reserve.
- * Most of the property is converted tall and short tussock and grey scrub that has been over sown and top dressed. Being Class VI land it has been responsive and exotic pasture is well established.

Upper Clutha Branch, PO Box 28, LAKE HAWEA

-2-

- Being on the south east side of the North Dunstan Mountains, Cambrian is in the Cambrian section of the Dunstan Ecological District.

2. Significant Inherent Conservation Values:

- One of the main significant inherent values on this property is the abundance of woody vegetation representative of the area (see photo # 1). With freedom from interference (grazing, burning, spraying) the native woody cover would vigorously regenerate.
- The Halls totara on the property is highly significant; as this is a remnant of a much earlier vegetative cover, and is now only scarcely present. These trees are well worthy of protection.
- The landscape contained in Cambrian and those properties to the north and to the south form the stunning natural western backdrop to this part of the Manuherikia valley. The tall tussock and the native woody vegetation gives the landscape much of its character, especially on the faces highly visible from the Manuherikia valley
- The landscape of Donald Stuart Creek and the front faces is highly natural in character although clearance of shrubland detracts. The valley reads as a whole, the upper boundary fence is not readily visible.

3. CA1 (approximately 1ha)

- We fully approve that this small corner be returned to full Crown control. The original boundary fence had been placed around this corner area. Now is the time to give it full protection by fencing it off entirely.

4. CC1, CC2 (approximately 25 ha)

- We support this move to protect these two areas by way of covenants and it is pleasing to see that most of the area is going to be fenced off. However in view of the total amount of woody vegetation present in the catchment we are concerned that not enough consideration is being given to protection of woody vegetation on a ecosystem or landscape scale.
- We are also concerned that no protection is being provided for the more visible character-forming shrublands on the lower front country.

5. Land for Freehold Disposal:

- The land proposed for free holding is mostly Class VI land which is responsive to the application of superphosphate. If the supply to it is kept up to replace the nutrients taken off the place in the way of meat and wool, we see it could be described as ecologically sustainable if economically viable.

6. Access:

- We note the provisions being made through this property for part access from the St

-3-

- Bathans Loop Road to the existing Lauder Conservation Area, or Lauder Tussock Reserve, as it is sometimes known. As the third stated objective above is: *"....To secure public access to and enjoyment of high country land for the public to enjoy..."*. We commend this positive approach to an access problem where an easement requires passage through several properties to reach a Conservation Area - it is forward thinking.
- We have to point out however for this access route to be fully functional, it also requires that Lauder Station is agreeable to that portion of the route to the Conservation Area through that property being available also. While we know that Lauder station is in the tenure review process it has not reached the preliminary proposal stage as yet. As each application for tenure review on any property has to be considered as a unit on its own; access therefore to the Lauder Conservation Area is not a certainty.
- However it is a better outcome if access is secured on Cambrian in anticipation of access being secured on Lauder and we support this proposal.
- It should be noted that in the Conservation Management Strategy for Otago:
Objectives for North Dunstan Mountains: *To extend protection in the area to cover the remaining higher altitude areas of nature conservation importance, and to secure appropriate public access.*
 and again:
Priorities for North Dunstan Mountains: *The negotiation of protection arrangements For areas of biodiversity importance and recreational opportunities and access are the Priority activities in this Special Place*
- We see the North Dunstan Mountains becoming a valuable area for conservation and recreation in Otago's hinterland, equal to, and as important as, the other areas already protected such as Kopuwai and Te Papanui. The Lauder Creek Basin with its surrounding relatively intact *C. macra* tussock landscape contained in the Lauder Tussock Reserve is ideal as the centre of a new Conservation Park. The 10,000ha area target could be easily met in this area.
- The Lauder Tussock Reserve has lacked public access since its inception - if for any reason access was not obtainable out of the Lauder tenure review and the lessee of Cambrian was still adamant that farming activities precluded the use of the track that he has made available to vehicles in the past, we see no reason as to why walking access could not be provided on the Cambrian side of the fence between c & b. Any such access still requires an easement through Lauder to the base of the hill at a. (See Photo # 2)
- Although it is noted that in the proposal mention is made of vehicles crossing from the Manuherikia to Cluden; it must be pointed out that at this stage any new Conservation Park being created out of the land being returned to full Crown control in the North Dunstan Mountains - and we must assume such a park will eventually come into being - still lacks reasonable access for vehicles. In this respect to date the only vehicle access to any such park at the moment would be Thomsons Saddle on land that came from the Ardgour review; so every effort should be made to obtain vehicle access to the North Dunstan Mountains wherever feasible.

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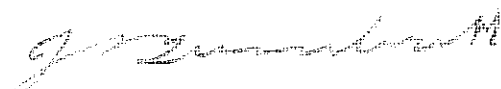
7. Discussion and Recommendations:

- We have dwelt at some length on the subject of access in this submission, but as this is the only proposal that we have so far come across allowing for part of the property being used for access to an area of conservation in conjunction with other properties: it has a created a good precedent. It is thinking an issue through and providing for good future outcomes.
- The small wetland CA1 is to be returned to the Crown for full protection but no provision has been made for the public to visit it. So too do CC1 and CC2 lack access for the public to visit them. As these areas are being protected for the public good, they should also have public walking access provided. This could be rectified by having a poled walking route to them branching off the proposed route a,b,c,d. up the ridge.
- The overall woody vegetation on this property and the biodiversity it contains are worthy of better protection than suggested in this proposal. While it is well worth while protecting the small areas as suggested in CC1 and CC2, the grey shrublands across the front face - related to a fault trace it appears - should be similarly protected (refer image). However it is our opinion that ideally there should also be an overall covenant to protect the woody component of the landscape in its entirety. Such a covenant would have conditions to prevent burning spraying or clearance of native species, forestry, undue tracking and fence line bulldozing and structures in the area. Dense patches of pure matagouri encouraged by fertiliser application could be excluded.
- The upper lease boundary should be brought down lower so that in the event the upper catchment on Lauder Station being retained in Crown ownership as conservation land, the eventual outcome will be a good one in landscape and visual terms. At present the catchment area is unnaturally bisected by the fence line. A suggested fence line is shown on the attached image.
- **We believe that the *Objectives for the North Dunstan Mountains* and the *Priorities for the North Dunstan* and the methods of *Implementation* contained in the Conservation Management for Strategy for Otago should be fully heeded.**
- **If we support the intentions they contain, full heed should also be taken of the complementary objectives to the CPL Act 1998 recently announced (please refer to EDC Min 5/3; CAB Min (03) 11/5).**

We thank you for allowing us to make this submission as we believe it will be of assistance to you and we look forward to see a favourable outcome.

Enclosed are photographs and diagram to explain the salient points

Yours faithfully



John L Turnbull and Anne Steven

for Upper Clutha Branch