



Crown Pastoral Land Tenure Review

Lease name : Clayton

Lease number : Pt 011

Public submissions

These submissions were received as a result of the public advertising of the preliminary proposal for tenure review.

March 03

RECEIVED

13 SEP 2001

Pt 11.01 2



Meridian Energy

File: L003-01

11th September 2001

Mr R A Ward-Smith *WAS*
Manager
Knight Frank
P O Box 564
TIMARU

Dear Mr Ward-Smith

CLAYTON TENURE REVIEW

Thank you for the information concerning the tenure review at Clayton Station.

It appears that none of the review has an effect upon Meridian Energy and its core land.
We therefore have no comment to make concerning the review.

Thank you for the opportunity.

Yours sincerely

Paul Cain
Environmental Field Consultant
Twizel Office

**"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"**

Meridian Energy Limited

Christchurch Office
25 Sir William Pickering Drive
PO Box 2454
Christchurch, New Zealand
Phone +64-3 357-9700
Fax +64-3 357-9701

Wellington Office
Level 2, 15 Allen Street
PO Box 10 840
Wellington, New Zealand
Phone +64-4 381-1200
Fax +64-4 381-1201

Twizel Office
State Highway 8
Private Bag 950
Twizel, New Zealand
Phone +64-3 435-0818
Fax +64-3 435-0839

24 AUG 2001

14 John Street
TEMUKA

28 August 2001

Your ref Pt.11-01 Clayton

The Manager
Knight Frank
P O Box 564
TIMARU

Dear Sir

Clayton Tenure Review Preliminary Proposal

I agree with the proposed split between freeholding and retention in full Crown control proposed on the plan and letter submitted 3/8/01.

The use of the dozed access track from b to b on the plan for non-motorised traffic will be appreciated by recreation users of the area.

I presume the proposed marginal strip shown on Pt.Sec195 89 will be extended down the N Opuha river to the South West corner of Area 2 and also down to the Clayton Road Bridge.

An easement on the North edge of Area 2 should be negotiated from point d down to the Orari river and a Marginal Strip included along the Orari river to the hut with a short easement across the corner of Area 2 to the Lochaber road.

This would provide for an excellent round the rivers tramping trip.

Thankyou for the opportunity to make a submission.

Yours faithfully



Allan Evans
Federated Mountain Clubs

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

RECORDED

14 SEP 2001

3

12A St George St.

TIMARU

10 - 9 - 01

The Manager
Knight Frank
P.O, Box 564
TIMARU

Dear Sir,

Thank you for the opportunity to comment on the Clayton Tenure Review proposal.

I applaud the return of more non - productive high country to the conservation estate.

The easment b - b across the freehold portion (Area 2) giving access to Area 1 for trampers and others will be greatly appreciated.

Has any thought been given to similar access up the Orari River from the Lochaber Road then along the north eastern boundry of area 2 to point d on your map ?

This would give an alternative access and could make an interesting round trip instead of having to move ⁱⁿ and out along the same track.

Please give this idea some consideration.

Once again thanking you.

Yours faithfully



Neville Guthrie

South Canterbury Tramping Club

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

% KNIGHT FRANK

Box 564 TIMARU

RECORDED

21 SEP 2001

19 SEP 2001

Dear Sirs,

My submission concerns the proposed conservation area of 971 hectares. As a neighbour I have not to date been consulted regarding this proposal. I am concerned as to the intended use of this land, I wish to be consulted by Dept Conservation or whoever will be responsible for its management. My concern is the effect of any proposed activity on my property as neighbour. There may also be some boundary issues. Awaiting your reply..

Yours faithfully

s. Until satisfied with this proposal I object to it.

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

RECEIVED

5

21 SEP 2001

GERALDINE TRAMPING CLUB



50 Kalaugher Road
RD 21
Geraldine
18 September 2001

The Manager
Knight Frank Ltd
PO Box 564
Timaru.

Dear Sir,

re: Clayton Tenure Review Preliminary Proposal


Thank you for forwarding to us the details of this preliminary proposal.

We believe that the bulldozed access track from b to b on the plan should also be available for vehicles for recreation purposes (with appropriate conditions). With an ageing but active population today the facility of being able to drive to conservation land adds considerably to the use and enjoyment of these areas by the older generation. While the need to walk along the access track would not be a problem for younger trampers it would certainly detract from the use of the conservation land by older trampers simply because of the extra time and effort required.

We would also like to see the marginal strip shown on PT SEC 195 89 extended down the north Opuha river to the south west corner of area 2 and further down to the Clayton Road bridge. An easement on the north edge of area 2 should also be provided from point d down to the Orari River. A marginal strip should also be created along the Orari River to the hut with a short easement across the corner of area 2 to the Lochaber Road.

Many thanks for giving us this opportunity to put in a submission.

Yours faithfully
for Geraldine Tramping Club


GRK Hunter

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

South Canterbury Branch
29a Nile St
Timaru

RECEIVED

21 SEP 2001



FOREST
& BIRD

ROYAL FOREST AND
BIRD PROTECTION
SOCIETY OF
NEW ZEALAND INC

19.09.01

Re: Clayton Tenure Review Preliminary Proposal

The Branch would like to make the following comments on the above proposal as this area of Crown Land is within our area of interest.

We note that 971ha is proposed to be designated as land to be restored to full Crown ownership and control as a conservation area, and 2422ha to be disposed of by freehold disposal to the holders. We ask if this is an equitable allocation and if all significant areas for conservation have been allocated to the Crown. Without seeing the appropriate reports we would like to be assured that the above allocation of land between the Crown and the holder is both fair and reasonable and that no land of conservation significance has been disposed of which should be in Crown ownership.

We understand that the important Clayton Wetlands has been, or will be protected for public ownership by another process. Clarification on this would be appreciated.

However, with regards to access an easement under 7(2) Conservation Act 1987 to provide public access to pedestrians, horse riders and non-motorised transport from the legal road on the true left bank of the North Branch of the Opuha River to the proposed conservation land, as marked on the plan, is supported. But we ask that a similar easement be extended, to follow the true right of the Orari River to the Red Hut and through the small portion of land to be disposed of and to connect with the Lochaber Road. As this would provide a round trip passing through interesting countryside, and access by two alternative routes to the proposed conservation land. We feel this is an unique opportunity to do this and it should not be missed. So, we strongly urge that the access easement be extended to provide for a round trip or an alternative access to the proposed conservation land.

The Branch asks that our comments be given full consideration.

Yours faithfully

Fraser Ross
Branch Field Officer.

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"



New Zealand Alpine Club Inc.

Founded 1891

21 SEP 2001
RECEIVED
21 SEP 2001

7

20 September 2001

R A Ward Smith
Frank Knight Land Resources Division
PO Box 564
TIMARU

Dear Sirs

SUBMISSION : CLAYTON TENURE REVIEW PRELIMINARY PROPOSAL

I can advise that the NZ Alpine Club generally supports the proposal as notified, for tenure review of the Crown Pastoral Lease area of Clayton Station.

The only significant aspect of the proposal of concern to NZAC is the matter of public access to the proposed easement marked **b-b** on the appended plan. There is no legal road on the true left bank of the North Branch of the Opuha River. The formed road giving access to the Fox Peak Ski Club is a private road.

We understand that the proposed easement **b-b** is intended to commence at the river boundary. Public access to that point from the nearest formed legal road will only be available via the riverbed, which is not the best outcome.

We therefore recommend that every effort is made to negotiate as part of this tenure review proposal, an additional easement to provide public access for pedestrians and non-motorised transport (and perhaps horse riders, although they are not our specific concern) along the approximately 7 kms of private road linking Lochaber Road with the proposed easement **b-b**. We would not expect public vehicle access to be allowed on this private road.

We appreciate the opportunity to comment on this tenure review proposal.

Yours sincerely

Phil Doole
Secretary

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

South Canterbury Section, P O Box 368, Timaru

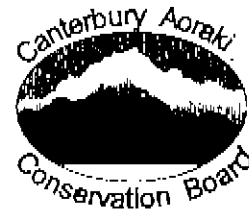
RECEIVED

25 SEP 2001

8

24 September 2001

The Manager
Knight Frank
PO Box 564
Timaru



Attn: RA Ward-Smith

Dear Sir/Madam,

Subject: Clayton Tenure Review Preliminary Proposal - Your reference Pt.11.01 Clayton

Firstly I must apologise for not meeting your deadline date for comment by 21 September 2001.

The board thanks you for the opportunity to comment on the proposal.

It only has one concern and that is that any easements for access must be real and not paper easements.

Other than this the board has no other comment to make on this proposal.

Yours sincerely

Alan Jolliffe

Convenor of the Planning Committee.

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

9

RECEIVED 29 OCT 2001

Public Access New Zealand

INCORPORATED

R D 1 Omakau 9182 Central Otago New Zealand
www.publicaccessnewzealand.org

Phone & Fax 64-3-447 3554
panz@es.co.nz

October 29, 2001

Commissioner of Crown Lands
c/- Knight Frank NZ Limited
P O Box 564
Timaru
Fax (03) 688 0407

Correction of Submission on Clayton Tenure Review Preliminary Proposal

On 19 October PANZ submitted a submission on the above proposal.

I wish to advise that this contained 2 errors, in relation to section 58 Land Act 1948, being-

P11, paragraph 2

"We believe that s58(3)(a) Land Act 1948 could be used to create a road between the southern boundary of the pastoral lease and the bridge."

Pg 13, paragraph 2

"Section 58 remains, and has not been replaced by the Conservation Act".

As section 58 was repealed by the Conservation Law Reform Act 1990, please delete these two sentences from our submission.

As no consolidated version of the Land Act is available on the Internet, containing all repeals and amendments from all statutes, time constraints did not allow checking outside of Land Act amendments. This is an error hopefully not to be repeated.

In regard to our argument for road creation on page 11, we believe that section 40 Land Act could be used for purchase of private land for a government purpose.

Yours faithfully



Bruce Mason
Researcher & Co-Spokesman

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

Public Access New Zealand

INCORPORATED

R D 1 Omakau 9182 Central Otago New Zealand
www.publicaccessnewzealand.org

Phone & Fax 64-3-447 3554
panz@es.co.nz

October 19, 2001

Commissioner of Crown Lands
c/- Knight Frank NZ Limited
P O Box 564
Timaru
Fax (03) 688 0407

FAXED
19-10-01

23 OCT 2001

Submission on Clayton Tenure Review Preliminary Proposal

On 20 September 2001 I advised that I had not received requested official information on this proposal, and consequently PANZ was unable to make informed commentary within the due time. I subsequently requested and obtained the Commissioner's approval for extension of time for submissions until Friday 19 October. This is our substantive submission.

Without our access to a large body of official information, it would have been impossible to make informed commentary on the proposals. The summary of the proposals released at the time of public notification is so selective in presentation, and short on detail, that reliance on this alone would not allow critical evaluation of the proposals.

Summary of PANZ Recommendations

1. That northern and western portions of the Low Claytons become conservation area in addition to Ben McLeod Range (boundaries as per Draft Preliminary Proposal).
2. That public road access Lochaber Road to bank of North Opuha River at ski club bridge is secured.
3. That an additional Orari River access is secured.
4. Marginal strips:
 - An indicative plan is prepared showing the location and width of existing marginal strips, and of all additional strips required by the Conservation Act including bank to bank distances and the position of such field measurements. This plan to be accompanied by statements of any intention to waive, reduce or increase the width, or appoint managers over marginal strips.
 - This plan is made available for public submission prior to the CCL adopting any Substantive Proposal for Clayton Station.
 - The Standard Operating Procedures for both LINZ and DOC be amended to require on all future tenure reviews the release of the indicative plans and any statements of an intention to waive etc., for public submission at the same time as Preliminary Proposals are advertised.

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

Area proposed for Crown ownership inadequate

PANZ welcomes the proposal to reserve the Ben McLeod Range portion of the property, including a former POL and a wetland previously agreed for surrender. It was appropriate that these areas be dealt with separately from this tenure review as they were subject to funding conditions by previous authorities. However we are far from satisfied that all areas of the pastoral lease that should be publicly reserved are planned to be.

DOC originally proposed that approximately 700 hectares of the Low Claytons be reserved, along with another 1000 hectares of the Ben McLeod Range (these areas being additional to 754 ha of alpine lands and 96 ha of wetland separately agreed for surrender from the pastoral lease). Refer to Appended Map 1.

At the draft preliminary proposal stage the area recommended for retention in Crown ownership and control remained at 1700 hectares.

Subsequently the area was reduced to approximately 1550 ha by excluding much of the low basin in the SW corner of the Low Claytons, but retaining the Opuha valley frontages and the northern and highest areas of the Low Claytons. Refer to Appended Map 2.

PANZ believes that only the catchment immediately north of the airstrip could justifiably be excluded from Crown ownership as the tussock cover is relatively thin and low in stature compared to the rest of the 'low basin' (see enclosed photograph). We also believe that it is critically important that the west-facing slopes above the North Opuha River be reserved to protect the tussock outlook from the valley floor and to ensure that forestry development is precluded.

As far as official justifications go for excluding the Low Claytons in toto from Crown ownership at this advertised Preliminary Proposal stage (refer to Appended Map 3), we believe that these cannot be sustained. The reasons given are contradicted by officials' earlier substantive documentation of inherent values and associated statements that these earlier proposals were in accord with the Objects of Part 2 of the Crown Pastoral Lands Act (CPLA).

Current pretence that these values no longer exist on the Low Claytons, or if so to a lesser degree, do not negate the validity of earlier advice. It follows that to exclude the Low Claytons would be contrary to the Objects of Part 2 of the CPLA in terms the well identified significant inherent values, the promotion of ecologically sustainable management, or by inappropriately deeming this land to be capable of economic use.

In our view, retaining 971 ha in Crown ownership and freeholding of 2422 ha is not an equitable exchange of interests. This is due to the very significant inherent values overall and the inherent unsuitability for economic use of most of the area proposed for freeholding, an option already rejected by the Land Settlement Board.

Our chronological review of official documents leads us to the view that, since a decision to drop any part of the Low Claytons from the area to be restored to full Crown ownership, official advice to the Commissioner has been tailored to promote this changed position, rather than project impartial assessment of the resources under review.

Omissions, and changed descriptions of these resources, are evident from the time of preparation of drafting instructions for the Preliminary Proposal. Up until that stage, that is until finalisation of DOC's conservation resources report, official advice provides accurate description of inherent values and their importance, right across the pastoral lease. My independent field observations, which were made before seeing these documents, supports DOC's earlier observations and recommendations. Comparison of official descriptions of the Low

Claytons prior to and after official decisions not to go for Crown ownership of this area are very revealing. So significant is the divergence of description that any Independent observer would have cause to wonder if the same area was being assessed.

Underlined words and phrases are PANZ's emphasis. Our commentary is contained within [square brackets].

Scoping Report, February 1997

"A true high country block of tussock country generally lying south experiencing extremely cold winters."

"...there are some native blocks that have had very low grazing in recent years and in view that the Land Settlement Board did not previously reclassify, there are likely to be blocks that will not be able to be reclassified under the present Land Act despite being well covered"

[This report recorded the entire pastoral lease as being either Land Use Capability Class VII or VIII. As we argued in our Glen Nevis submission, we believe that LUC classifications are a direct reflection on inherent values and must be taken into account during tenure review].

DOC Conservation Resources Report, August 1999

Landscape

"The Low Clayton's blend in with the surrounding hills and the Pastoral Lease presents a homogeneous tussock landscape that contrasts greatly with the more highly developed and highly sub divided farm land".

"Within the Pastoral lease small discernible differences are noticeable. These primarily arise from differing vegetation condition and the topography of the property. These features are, a low plateau above the Nth Opuha River of red tussock which is relatively intact and compliments the existing reserve which adjoins the Opuha River. The Low Clayton Hills contain a steeper topography with small slips, lower stature tussock cover and scattered shrublands. The small gullies that flow south of the Low Claytons are incised and Stoneyard Stream contains an extensive but scattered mountain ribbonwood shrubland, which contrasts strongly with the other existing shrublands and tussock grassland.

"Despite Clayton Station's proximity to Fairlie the Low Claytons provide a feeling of remoteness, this is primarily due to the extensive tussock grassland and the lack of obvious human intrusions". [Pg 1-2]

Vegetation

"Virtually the whole of this Pastoral Lease is in good tussock grassland with regenerating shrubland on lower slopes and in gorges. The lower hillslopes towards Meikleburn Saddle and below 800m are greener with exotic grasses showing the effects of top dressing and oversowing". [Pg 2]

"Above about 900m, exotic species become only a minor component of the vegetation and where the narrow-leaved snow tussock cover is high then there are no, or very few, exotic species. On the west side of the Low Claytons lies a large, shallow basin 100m above the Opuha River and running approximately north-east and south-west and from 650m to just over 900m. It contains extensive areas of red and narrow-leaved snow tussock (Chionochloa rubra and C. rigida). Ross Stream has an area of thick shrubland, some of which extends into freehold land. There is a good representative community here. Apart from a few small areas mainly below 900m the whole PL has good conservation values" [Pg 3]

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

Low Claytons

"Short, 450mm - 550mm, narrow-leaved tussock covers most of the Low Claytons and is in particularly good condition in the northern parts and above 800m on these low, rounded hills. The southern parts have increasing amounts of exotic grasses, especially below about 800m, presumably from oversowing and topdressing. Some of the summit areas and especially along the tracks have much browntop but in the main native plants form at least 80% of the cover. On less well drained, lower slopes the taller red tussock dominates. Hard tussock, blue tussock (*Poa colensoi*) and a range of small shrubs such as *Pimelea oreophylla*, *Gaultheria nubicola*, *G. novae-zelandiae*, and herbs such as *Raoulia subsericea* occupy inter-tussock spaces. *Celmisia spectabilis* is often prominent with patches of matagouri and a few patches of bracken and *Aciphylla aurea* where it is more open with stony, shallow soils. Mosses and lichens are also more prominent here. South and east facing slopes generally have a taller and denser tussock cover than north and west facing slopes". [pa 4]

Shrubland

"Low matagouri shrubland occurs in patches on many of the lower slopes with *Coprosma propinqua* and appears to be increasing after probably suffering from frequent burns of an earlier era. The only significant areas of shrubland are found in the narrow gullies of the Ross and Stockyard streams, particularly the former. Here there is a sizeable area of good mixed shrubland, a community with large broadleaf (*Griselinia littoralis*), *Olearia bullata*, *Melicactus* sp., *Corokia cotoneaster*, *Coprosma rigida*, *Hebe salicifolia*, mountain wineberry (*Aristotelia fruticosa*) and mountain ribbonwood (*Hoheria lyallii*). The lianes *Rubus schmidelioides* and *Muhlenbeckia complexa* and ferns *Polystichum vestitum* and *Hypolepis millefolium* are also here. This area appears to extend into freehold land."

Mixed Red/Narrow-leaved Tussockland

"The south-west corner of the pastoral lease contains a large basin about 100m above the North Opuha River Valley. This is an unusual feature with a good cover of tussock. A mosaic of tall red tussock in the drainage areas with shorter narrow-leaved snow tussock on drier slopes. Inter-tussock species include browntop, *Lotus pedunculatus*, *Viola cunnighamii*, *Nertera dichondrifolia*, *Anisotome flexuosa*, *Coprosma cheesemani*, *Plantago uniflora*, *Blechnum penna marina*, *Schoenus pauciflorus*, *Carex coriacea* and mosses". [pg 4]

Recommendations

4.2.2. Low Claytons

Recommendation

It is recommended that an area of approximately 700 hectares be retained by the Crown and managed by the Department of Conservation.

Description

The recommended area for protection is in two parts. The first part includes the northern and western portions of the Low Claytons block extending from the Orari River and across to the terrace above the North Opuha River. The second portion includes the Terrace and faces above the North Opuha River, along with the upper catchment of Ross Stream, down to the airstrip above the ski field road.

Rationale

The first part of this area has short narrow-leaved tussock in good condition. In the south-west corner there is a large basin containing a mosaic of tall red tussock in the drainage areas, shorter narrow-leaved tussock on drier slopes and a good variety of inter tussock species. Red tussock on a drier plateau is relatively rare as it is now normally confined to the damper wetter areas. This area

provides a good buffer zone along the river and compliments the Ben McLeod Range proposal and the existing wetland that has been protected.

Modified recommendations

4.2 Proposals and Justification

4.2.1 Land to be Restored to or Retained in Full Crown Ownership and Control

4.2.1.1

Name. Ben McLeod Range and Low Claytons

Existing status: pastoral lease

Authority: s.35 (2)(a) (i) CPLA

Proposal. That an area of approximately 2000 hectares be designated as Conservation land to be managed by the Department of Conservation.

Description: This large area extends from the North Opuha River over part of the Low Claytons to the Orari River. And also includes the spurs extending off the Ben McLeod Range.

Justification: The land is characterised by areas that have the following significant inherent values:

1) The Low Claytons and the Ben McLeod Range form part of the wider landscape of the inner Fairlie basin. They contribute the following attributes:

- Landscape is largely a homogenous tussock one.
- Little apparent modifications
- Area contrasts with the modified surrounding farmland

2) [applies to Ben McLeod Range only].

3) The red tussock growing on drier areas is relatively rare and is normally confined to the wetter areas.

4) Protection of this area would make a special contribution to the natural functioning and buffering of the Range by:

- Linking the Low Claytons with the Ben McLeod Range and the public Conservation Lands beyond.

5) This total area will enhance the recreational opportunities of the area by:

- Improving access to the existing Conservation land up the Nth Opuha River.
- Providing linkages with the Low Claytons and the Walkers Spur

Submission on Draft Preliminary Proposal, December 1999

"The proposed designation (of 1700 ha as conservation area) will be to protect the large visual backdrop on the Low Claytons and Ben McLeod Range...south of these saddles is the inverted U shaped Low Claytons with a maximum altitude of 1086m within the area under consideration for designation for conservation. The sunny northern faces contain a mixture of short and tall tussock grasslands together with a diversity of native herbs and shrubs. South of this area spurs run down to more intensively utilised downs and pastoral flats outside of the area proposed for conservation which have mostly been improved for grazing."

"The landscape is largely a homogeneous tussock area with little apparent modification visible."

"The area is currently subdivided into eight framing blocks with only a small area of some 100 hectares having previously been oversown and topdressed."

"The proposed designations will meet these objects (s24 CPLA) in several ways. Restoring the proposed conservation designation to full Crown ownership and control as conservation area will enable the protection of significant inherent values."

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

"The area contains significant ecological values including diverse shrublands, extensive tall tussocklands...mountain flax and a few cassinia are found on damp south slopes. On the lower slopes, fescue tussock and blue tussock communities occur together with a scattering of shrubs.

"Apart from the specified biological diversity above the area forms a large visual backdrop to the Fairlie basin viewed north to the Ben McLeod Range.

"The proposal therefore meets the requirements of objective (b).

Management of this area as 'conservation' will help promote ecological sustainability because the primary purpose will be management for conservation purposes instead of pastoral production (refer object (a)(i). Much of the area proposed for restoration to full crown ownership and control is either less suitable to or marginally economic for continued pastoral use."

"On the area proposed for freehold "there is no need to impose covenants in order to promote 'ecologically sustainable' management."

"Some inherent values have been identified in this area but do not warrant protection by using protective mechanisms."

"Possible future land uses for the area to be designated freehold included continued pastoralism or forestry." [Pg 6]

"The Low Claytons and Ben McLeod Range form part of the wider landscape of the inner Fairlie Basin...the lower end of Walkers Spur and a leading ridge running south beside the North Opuha are part of the subject of this report, together with the Low Claytons. The landscape is largely a homogeneous tussock one with little apparent modification, and contrasts with the modified farmland to the south." [Pg 7]

Preparation of Drafting Instructions for Preliminary Proposal; Report on Consultation, July 2000

"The area to be excluded, being all the northern faces above the Opuha River and Opuha Wetland, north end of the Low Claytons and north-east faces above the Orari River contain various inherent values of moderate value. The high value areas lie further north the land rises to 1088 metres which is just on the limits of economic farm development by way of oversowing and topdressing. The area has already been considerably modified by grazing over many years and is currently divided into five grazing blocks. Whereas the land to the north has had much less grazing and is thereby less modified...the proposed amendment will create two blocks with good boundary lines retaining the highest inherent values for conservation and designating as freehold land with farming and forestry capability." [pa 5]

Fence 'spin doctoring'

As an alleged benefit of the greatly reduced conservation area as proposed in the Preliminary Proposal, it is claimed that there will be a saving of 800m of fencing compared to earlier proposals.

However this is what DOC had to say about the Low Claytons proposal (refer to map 2) –

"This area could be protected by utilising the existing fences and some internal fences could be removed" [DOC Amended recommendations, August 1999]

And later, officials advised that—

“The proposed boundary line is along an existing fenceline, part of which may have to be upgraded to boundary fence standards.” [Submission on Draft Preliminary proposal, Pg 5, May 2000]

“No new boundary fencing is required to be erected on the boundary between the proposed freehold (Area 2) and the proposed conservation land (Area 1) shown on the plan [Submission on Draft Preliminary proposal, Appendix II, Drafting Instructions pg 3, May 2000]

There is a possibility that a short length may need to be upgraded to boundary fence standard as some fences in the area are known to be electric type.”

[Report No: R0118: Appendix 2 - Drafting Instructions, Pg 3, May 2000]

However after consultation with the lessee, and consequent decisions by officials to drop the Low Claytons as a proposed conservation area, this is what was advised—

“It [the new boundary along the wetland] would reduce additional fencing to some 800 metres, as well as providing a logical and natural boundary through the low saddle between the two catchments”.

[Report on Consultation, pg 3, July 2000]

“Reasons for proposed amendments” are presented. A table is presented as a “Summary of Fencing” whereby the ‘previous’ proposal required 1500m of fencing, compared to 800m for the new boundary. This is claimed to be a “net saving of 700m”. [Report on Consultation, pp 5-6, July 2000]

However the 1500m of previously required boundary fencing appears to be existing fencing. Therefore there is no net saving as portrayed, rather a net cost of 800m of new fencing, as opposed to “a short length of upgrading of existing fence”.

A more natural boundary?

It is claimed that “to exclude this area [the Low Claytons] from retention will create a relatively natural boundary along the edge of the existing protected wetland through a low saddle between the North Opuha and Orari catchments, then joining the corner of the existing boundary with neighbouring Dry Creek Station” [Preparation of Drafting Instructions for Preliminary Proposal; Report on Consultation pg 5]

It appears that the new fence is planned for location either along the base of the hillside or beside the vehicle track. However we do not believe that this will be more “natural” (refer to photograph). The only thing ‘natural’ about this could be its position at a change of slope. This fencing would replace existing fences near the centre of the valleys either side of the saddle. This fence relocation would be no more than tinkering with adverse impacts.

With the potential for forestry development on one side of the fence, the natural setting on the other side would be overwhelmed in this enclosed valley landscape. Quite apart from the desirability of retaining the natural values of the Low Claytons, it is essential that planned conservation areas and reserves are buffered from such development. A tussock landscape, free of sources of exotic weeds and pines, must be preserved.

Allowing pasture development and forestry in such a sensitive area is also going to seriously compromise tenure review options on the adjoining Dry Creek Station.

Musterers' Hut

"A 'Sardine musters' [spelling not ours] hut built in the 1888s by Mt Peel Station has been well maintained and is in very original condition. The holder has requested that DOC maintain this. No commitment could or should be made in that regard". Summary of (tenure review) actions to date, June 2000

"An existing hut could be utilised for recreation or ~~removed~~ depending on the benefits it provides to the area".
DOC tenure review recommendations, August 1999

I have visited this hut and it certainly is "well maintained and in very original condition". Given its historic status, and condition, it was a reasonable request from the lessee that this be maintained. Very little effort would be required to ensure its ongoing maintenance. The only immediate work needed is a drainage ditch behind the hut. I believe it is an appalling indictment of DOC to contemplate removal of this hut. Irrespective of its usefulness for recreational use, which it does possess, it is an historic resource that requires "preservation and protection" along with natural resources in the area proposed to be transferred to DOC's care.

The department has a duty to promote 'conservation' as defined by s2 Conservation Act 1987-

"Conservation" means the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations:

"Historic resource" means a historic place within the meaning of the Historic Places Act 1980; and includes any interest in a historic resource:

Historic Places Act 1980, s2

"Historic place" means a place (including a site, building, or natural object) which is historic by reason of an association with the past and which demonstrates or provides evidence of any cultural, traditional, aesthetic, or other value of the past; and includes---

- (a) Archaeological sites:
- (b) Traditional sites:

Department officers should be well aware of their historic place responsibilities in their parent legislation. It is inexcusable that either they don't know, or they dismiss this responsibility. Given recent attention to the content of the Crown Pastoral Land Act in the preparation of departmental Operating Standards, they should also be aware of what they are supposed to be achieving under that Act.

Crown Pastoral Land Act 1998, s2

"Inherent value", in relation to any land, means a value arising from---

(b) A cultural, historical, recreational, or scientific attribute or characteristic of a historic place on or forming part of the land:

"Significant inherent value", in relation to any land, means inherent value of such importance, nature, quality, or rarity that the land deserves the protection of management under the Reserves Act 1977 or the Conservation Act 1987:

Objects of Tenure Review, s24

(b) To enable the protection of the significant inherent values of reviewable land

Public access is not 'secured'

The Preliminary Proposal makes only one provision for public access to the area proposed for retention in Crown ownership. This is for public foot, horse, and non-motorised access from "the legal road on the true left bank of the North Opuha River", through the proposed freehold. I have walked this route and believe that it is very suitable for these forms of access. Interesting views are obtained of the Opuha valley, the Low Claytons and Ben McLeod Range which would not be available from a valley-floor route.

Terms of public access easement

We are pleased that use is to be "at any time". However we are perturbed by powers to frustrate public recreation through provision for temporary suspension of access. Such arbitrary powers are liable to be abused.

We note the express exclusion of the rights and powers contained in the Ninth Schedule of the Property Law Act, but not of those in section 126G which enable modification or extinguishment of easements through the Courts. The latter should be expressly excluded by the terms of the easement.

We note mechanisms for resolving disputes between the Transferor and the Transferee, but there is no provision for public notification or objection to any changes to the terms of the easement. We welcome the easement being pursuant to section 7 (2) Conservation Act, which should require section 49 public notice procedures if any disposition of the Crown's interest in the easement is proposed. However there is too much scope for official discretion as to whether or not a change that may be detrimental to public access is deemed to be a disposition. Given that "any member of the public" is included within the definition of "Transferee", but excluded from any settlement of disputes, we think it only proper that there be an express requirement for s49 Conservation Act procedures whenever any change or extinguishment to the terms of the easement is proposed.

No width is specified in the easement document, however other documents indicate an intended width of 10 metres centered on the existing vehicle track. If the proposed boundary for a greater conservation area remains as proposed in the Preliminary Proposal, this will mean that there will not be 'legal' access to the wetland reserve before the low saddle between the North Opuha and Orari catchments. Where the track first descends to beside the wetland boundary fence this will mean that there will be a 10m gap between the edge of the easement and the fence. An offshoot of the easement should be extended to the fence at this point. It should be unnecessary for members of the public to have to climb to the saddle then backtrack to be able to access the wetland or to reach the upper Opuha River.

Legal road incomplete and uncertain alignment

The proposed public access easement is absolutely dependent on there being legal road access from its commencement. Otherwise no public purpose would be served. There is a duty under s24 CPLA for "securing of public access to and enjoyment of reviewable land".

The official documents repeatedly state that "there is a legal road on the true left of the North Opuha River, leading from Lochaber Road to the western boundary of the lease" [e.g. Due Diligence Report pg 2]

However there is also confusion in official advice as to the status of the irregular width strip of land between the existing Clayton freehold and the North Opuha River.

The Land Status Report pg 3 states that the "only allocation is to DOC - J37-3 - over marginal strips along North Opuha River on the western boundary". My record of land allocations in the 1980s, and confirmed by DOC's Canterbury Conservation Management Strategy, Vol 2, Sheet 17, records three separate parcels of land

allocated to DOC along the BED, not the bank or margin of the North Opuha River. Vol 2 of the CMS (pg 257) records that there are 86 hectares of Crown land held under section 62 Conservation Act, not as marginal strip. Section 62 is 'land to be managed as if it is stewardship area'. The legal description in the CMS is "Pts Nth Branch Opuha Riverbed adj Pt Run 14 SO 17114'.

The southern and largest parcel allocated to DOC adjoins an irregular width strip of land along the southern boundary of the Clayton freehold. It appears that it is the latter strip that the Fox Peak skifield access road is on. SO 2595 'right-lines' the landward boundary of this strip, whereas the position of the river-side is only sketched and described as the "Terrace of the North Opuha River". Whether this 'terrace' is the same as the bank I do not know. However this section of irregular strip joins, without legal/cadastral interruption, with Lochaber Road. It therefore appears to be legal road.

I have not been able to verify advice in the Land Status Report [pg 4], that "SO Plan, 11998 denotes the roads intersecting and abutting Run 14 coloured burnt sienna are legal roads under section 110A Public Works Act 1928", as the copy supplied to me by LINZ is black and white. This needs checking to verify which particular parcels are legal roads along the banks of the North Opuha.

Thus status, as well as location, of the irregular strips must be determined as the first step to "securing" public access to the area under tenure review. The northern most strip is recorded to be Legal Road (DP 44291), however the status of a small parcel west of Trig B is unknown. There are also two small interruptions to these strips, which appear to be riverbed. So even if all three strips are legal roads, these do not provide continuous legal access to the PL boundary at the commencement of the proposed easement. Therefore the official advice to the CCL on this matter is incorrect.

As the Clayton freehold boundary with these 'roads' has been right-lined by survey (SO 2595) it would be a relatively simple exercise to fix the boundary positions. This is essential to determine if the boundary fence is correctly positioned, and if the road formation is on the legal alignment. If not, as the official reports suggest on several occasions, this needs to be investigated and corrected, either by 'taking' parts of the riverbed for roading purposes, or negotiating the acquisition of parts of the Clayton freehold as an integral part of tenure review for the balance of the property.

Until this road access is secured, there is no basis for the advice in the Submission on Draft Preliminary Proposal [Pg 7] that, "proposed public access...is provided by an existing legal road to the southern boundary of the existing lease and then by the provision of an easement...this will enable public access...to be secured and will allow for public enjoyment (refer object (c)(i))."

The issue of the alignment of the Fox Peak Skifield access road has been repeatedly raised in the official reports, however no action has been recommended to resolve this as part of tenure review. For instance the Due Diligence Report [pg 2] identified this as an uncompleted action and proposed aligning the boundary with the existing fence with the land so excluded to be taken as Section 58 Land Act. It also suggested exchange of legal roads for access easements on practical alignments.

However this would not be an equitable exchange. If realignment is required, unformed legal road should be exchanged for formed legal road. We understand that formation of the road has been at the expense of the ski club and its guests, not by the land occupier. Public rights over public roads are certain and secure. The same cannot be said for easements. Vehicle access to the commencement of the easement is essential and preferable the few hundred extra metres to the river. The distance is too great for this to be confined to non-motorised access.

PANZ is aware of the CCU's antagonism to being involved with legal roads, however this is a policy position rather than a legal difficulty. It is within the Commissioner's powers to take initiatives to resolve access difficulties. As this is the only access proposed to public lands that may come out of this tenure review, we believe that failure to provide year-round, free, unobstructed vehicle access to the commencement of the proposed easement would be in breach of Government's duty to "secure public access and enjoyment of reviewable land" (s 24 CPLA).

The official documents reveal that, after many years, steps have finally been taken to register a easement in favour of the Fox Peak Ski Club over a few hundred metres of pastoral lease from the southern boundary to the bridge over the North Opuha River. A portion of this formed road is presumably intended to be utilised for the public access easement until the track swings uphill towards the airstrip. However we believe that public vehicle access to the river at the bridge is also needed and should be negotiated during tenure review. Without this access, there will be no way for anglers and recreational visitors in general to reach the river, and to traverse up its bed or banks to the wetland and other conservation areas if they wish. It would also allow an interesting round trip utilising the proposed non-motorised easement for the return trip. The bed of the river is public land; the true left bank will become marginal strip if not already. We believe that it is within the ambit of the CPLA to secure public access to these water margins. Whatever the legal arguments, it simply makes sense to secure access to the river at this time. We believe that s58(3)(a) Land Act 1948 could be used to create a road between the southern boundary of the pastoral lease and the bridge. If the district council will not accept vesting of this road, it could be designated a Government purpose road with the ski club continuing maintenance if they wish. It should not require any Crown input into road 'management'.

The official papers record the finalisation of the ski club easement as a completed action, however inspection of the easement document reveals that the easement applies only "for the term of the pastoral lease together with any renewals thereof". This will require to be rectified to ensure continuing access to the ski field if this portion of lease is freehold. The better option would be, as recommended above, to extend the legal road to the bridge.

Elsewhere in the papers it is commented that the practice of locking the gate at the junction with Lochaber Road will have to stop if this road is to be used for public access to newly created conservation areas ex Clayton Station. We understand that locking the gate has been more at the insistence of an adjoining freehold owner and not by the Clayton lessee or the club. Besides being illegal to obstruct a public road, this practice will have to cease if year-round access to public lands and waters is to be secured.

There are issues of road maintenance that need to be addressed but we do not see this as a Crown responsibility. It is for the Club, the above adjoining freeholder (who commercially benefits from using the road), and the district council to resolve.

Melkeburn Saddle easement

We are disappointed that an initial proposal for public access from the Melkeburn Saddle along the crest of the Low Claytons has been dropped from the Preliminary Proposal.

We agree with the Submission on the Draft Preliminary Proposal, Pg 8, which states -

"...this route would provide an important link between a public road and the proposed conservation area which would extend into the Phantom Rover to the north-east and back to the south-west and the North Opuha River in the south-west."

**"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"**

As DoC commented in their Conservation Resources Report, "access from Meikleburn Saddle along the farm track over the Low Claytons would provide a challenging mountain bike route as well providing alternative access to the proposed Conservation Lands beyond".

Objections from the lessee to this proposed access because it "...will seriously interfere with productive uses...traverses one of lambing blocks" [Preparation of Drafting Instructions for Preliminary Proposal; Report on Consultation, pg 5], led to this proposal being dropped from the Preliminary Proposal.

However we are not impressed by subsequent official downplaying of the importance of this access and the effect of its loss for the public. "...the deletion of this route will pose little detriment to total public use of the proposed designation for Conservation." [Preparation of Drafting Instructions for Preliminary Proposal; Report on Consultation pg 5].

The original DOC access proposals for access from both the Meikleburn Saddle and up the North Opuha were cognisant of NGOs views as conveyed to the DoC on 11 December 1997. It was recorded then that "horse trekkers have used the farm tracks and have used the old pack track that connects in with the Mowbray Road in behind Geraldine" [Conservation Resources Report, pg 7].

Orari access should be secured

The initial provision for two access routes recognised that existing recreational interest, and therefore likely future use, is from two different directions and by widely separated communities, Geraldine in the east and the Fairlie basin to the south. Providing just one access route cannot satisfy both needs. While there may be sound reasons for dropping the Meikleburn Saddle route as a 365 day a year access, we do not believe that this is sufficient reason for not pursuing a nearby alternative from the east via the Orari River. NGOs reported at the early warning meeting that "the upper Orari Gorge was an interesting access route".

DOC latter reported that "the Orari River which is relatively gorgy, also allows access to the sunny flanks of the Low Claytons and the upper reaches of the property [Conservation Resources Report pg 6] and that "a farm track runs down the Orari River and has been used by some recreational groups" [pg 7]. This track "may be within the confines of an existing marginal strip. This may need checking and an easement may also be desirable. [pg 13]

All that is required for the Orari access to be 'legalised' would be an easement (on the same terms and conditions as for the Opuha easement) from Lochaber Road down the Clayton boundary to the bank of Orari, or on an existing track if available. Marginal strips are destined to be laid off along its true right bank if not already done so. The position of the existing vehicle track needs to be determined to see if it lies within a standard 20m marginal strip. If not, wider strips should be laid off to ensure uninterrupted practical access for non-motorised users. If the portion of the Low Claytons is not publicly reserved as we advocate, then a further easement would be required along the Clayton boundary where it deviates away from the Orari River, to connect with the Opuha easement.

In some respects, the Orari route is a more attractive alternative to the formerly proposed Meikleburn Saddle route, as it provides an easier, more direct, and low level route to the Orari headwaters and proposed conservation areas. It also retains the option of access onto the Low Claytons should this area be publicly reserved. This route would also provide an almost direct connection onto Mowbray Road and the historic pack track to Geraldine. There is no problem in providing parking beside Lochaber Road.

"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"

Marginal Strips

PANZ is extremely disappointed with the way marginal strips have been dealt with on this property. This is indicative of wider mal-administration, which must be rectified.

Back in 1992 decisions were made that Part IV of the Conservation Act need not apply for freehold disposition arising from reclassification. This was on the basis that an entitlement for freeholding part of the lease predated enactment of the Conservation Law Reform Act 1990. However Section 58 of the Land Act already applied and a memorial was on the title to this effect. Section 58 remains, and has not been replaced by the Conservation Act. Therefore such an administrative decision is invalid. This decision is the reason there is now uncertainty of access to the skifield and the proposed public easement.

Other official advice concerning section 58 strips on the remaining pastoral lease subject to tenure review, such as the following, is incorrect—

“CL 529/13 contains a notation for Section 58 strips ~~to be~~ [future tense] excluded from the lease” [Land Status Report pg 2].

Whereas the actual notation on the certificate of title reads —

“Pursuant to Section 58 of the Land Act 1948, a strip of land one chain in width along the banks of all streams and rivers ~~is excluded~~ [present tense] from the within lease”. This notation is in accord with the provisions of the Land Act at the time the lease was issued, and currently.

We take particular exception to a variation of the terms of the pastoral lease, registered in 1989, which “extended” the term of the lease by 33 years, rather than renew the lease. There are express provisions in the Land Act for lease renewal which we believe preclude the ‘extension’ of the terms of existing leases. The Land Act only permits 33 year term pastoral leases, not for 66 years which the Clayton lease now purports to be. This raises an issue over the current legality or existence of this lease, and all others that have been similarly treated.

It is well established in law that the granting or renewal of a lease is a ‘disposition’. Such dispositions of lands of the Crown require the establishment of what are now known as marginal strips.

We believe that the decision made to ‘extend’ the term of the existing Clayton pastoral lease was a willful move to avoid the laying off of marginal strips, so subverting the intent of Parliament and the interests of the public of New Zealand. If so this would be a scandalous abuse of power, one that we understand has been applied throughout Canterbury. This is a matter that PANZ intends pursuing, however the problem remains of what can be done to salvage the situation on Clayton Station.

If current official attitudes and malpractice continues, there is no guarantee that this tenure review will necessarily result in marginal strips being (re)established to the full extent that they should.

As the Due Diligence Report, pg 2 notes, “there still remains parts of the North Opuha and Orari River to which Part IV of the Conservation Act (marginal strips) may apply”. The problems we perceive are likely to arise from exercise of untested official judgement as to what ‘may’ be required.

Average width verses ‘over’ 3 metres

There is the universal view held by DOC, surveyors, LINZ and contractors that it is only where streams and rivers are 3 metres or more in width that marginal strips are required. Such views defy the express terms of the Part IV of the Conservation Act and specific details on survey records for this property.

“RELEASED UNDER THE
OFFICIAL INFORMATION ACT”

Section 24 (3) Conservation Act and Section 58 Land Act require strips to be reserved along streams and rivers with "a bed that has an average width of 3 metres or more"(s24) or with "an average width of not less than 3 metres" (s58).

SO 19631 indicates that marginal strip pursuant to Section 24(3) of the Conservation Act 1987 extend along and abut all streams and rivers over 3 metres in width within or abutting Section 1" on the banks of the Opuha [Land Status Report pg 2].

However this misinterpretation of statute has probably meant that reaches of the river above the Opuha forks that are less than 3 metres from bank to bank could have, at least part-way upstream, qualified for marginal strips if the average width of the river the full reach of the river bank subject to disposition, had been considered and not just to the upstream point where the width narrows to 3 metres. A consequence of this misapplication of law is that there may not be practical access to Butler Saddle, being a primary recreational objective and historic route.

'Notional' marginal strips

Official attitudes that depreciate the worth of marginal strips are exemplified by statements such as— "The marginal strips remain notional pending their definition upon disposition" [Land Status Report pg 2]. The Concise Oxford defines 'notional' as: "existing only in thought, imaginary".

The above view is founded on the erroneous notion that strips cannot exist until such time as they are 'defined' by a survey action; that notation alone on plans and titles is insufficient to create legal entities. This is despite section 24D(3) of the Conservation Act empowering Chief Surveyors "to show marginal strips...in the manner (he) considers most appropriate". Notations are now the general practice, rather than graphically depicting strips as was the historic practice. We have major reservations about the current practice as without some form of graphic representation on plans no one can be certain where they exist. The consequence is that DOC often doesn't know where all the strips are that they are supposed to be administering and the public, the intended beneficiaries, are in the dark as to their existence and extent and therefore cannot use them. The practical reality is that undefined strips have become 'notional', although not in law. We believe that Chief Surveyors exercising their discretion to take an easy 'notation' course are largely responsible for defeating the marginal strip purposes of the Conservation Act. We wish to pursue with LINZ more appropriate means of recording marginal strips.

It seems that even when very explicit notations are recorded, such as relating to s58 on the Clayton title, strips remain imaginary in the minds of officials.

If doubts exist as to the existence or extent of marginal strips, now is the time to rectify the situation. However we are far from satisfied that the tenure review process to date has done so. The Project Plan required at the Draft Preliminary Proposal stage "marginal strip issues to be considered"; for the "CCL to instruct agent to notify the DGC of marginal strip issues to be addressed", and for "DoC to address marginal strip issues and advise agent". Clearly, from the official statements above, the important matters we have raised have not been addressed.

We submit that—

- An indicative plan is prepared showing the location and width of existing marginal strips, and of all additional strips required by the Conservation Act including bank to bank distances and the position of such field measurements. This plan to be accompanied by statements of any intention to waive, reduce or increase the width, or appoint managers over marginal strips.

- This plan is made available for public submission prior to the CCL adopting any Substantive Proposal for Clayton Station.
- The Standard Operating Procedures for both LINZ and DOC be amended to require on all future tenure reviews the release of the indicative plans and any statements of an intention to waive, etc., for public submission at the same time as Preliminary Proposals are advertised.

We predict that without transparency of administration, the problems we have raised are destined to continue.

Yours faithfully



Bruce Mason
Researcher & Co-Spokesman

Appendices

Map 1 DOC Recommendations

Map 2 Draft Preliminary Proposal

Map 3 Preliminary Proposal

Photographs

Aerial view of Clayton existing freehold and skifield access route

End of legal road and access to North Opuha bridge

Low Claytons tussock grassland

Opuha faces of Low Claytons, wetland, Ben McLeod Range

North Opuha - Orari Saddle & fencing

Musterers' hut

Public Access New Zealand is a charitable trust formed in 1992. Objects are the preservation and improvement of public access to public lands, waters, and the countryside, through retention in public ownership of resources of value for recreation. PANZ is supported by a diverse range of land, freshwater, marine, and conservation groups and individuals.

Clayton Station

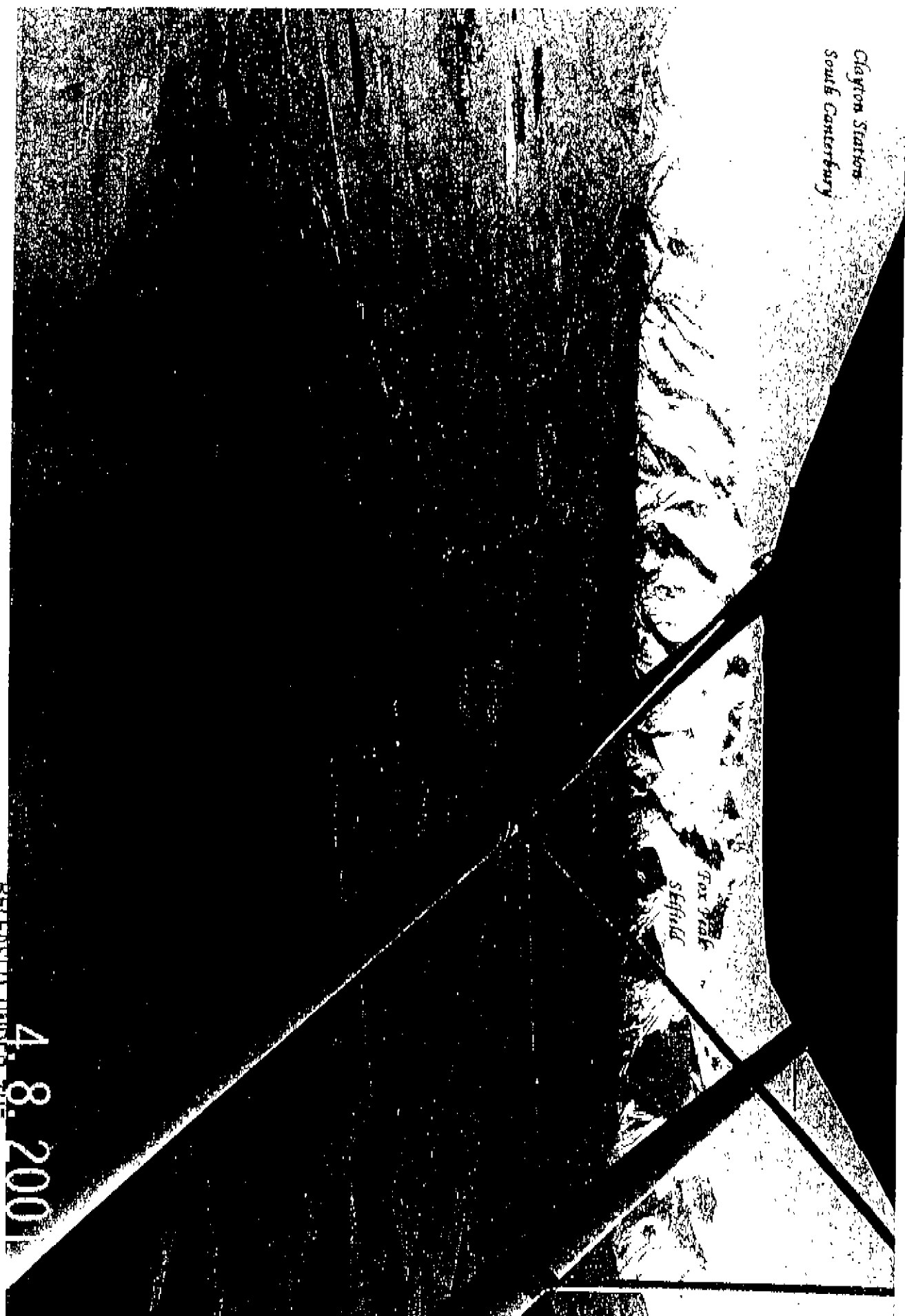
Continuous public road access is required from Lochaber Road
to the start of the access easement and the Opuka River bridge.
P&M/2, October 2001

Proposed public easement



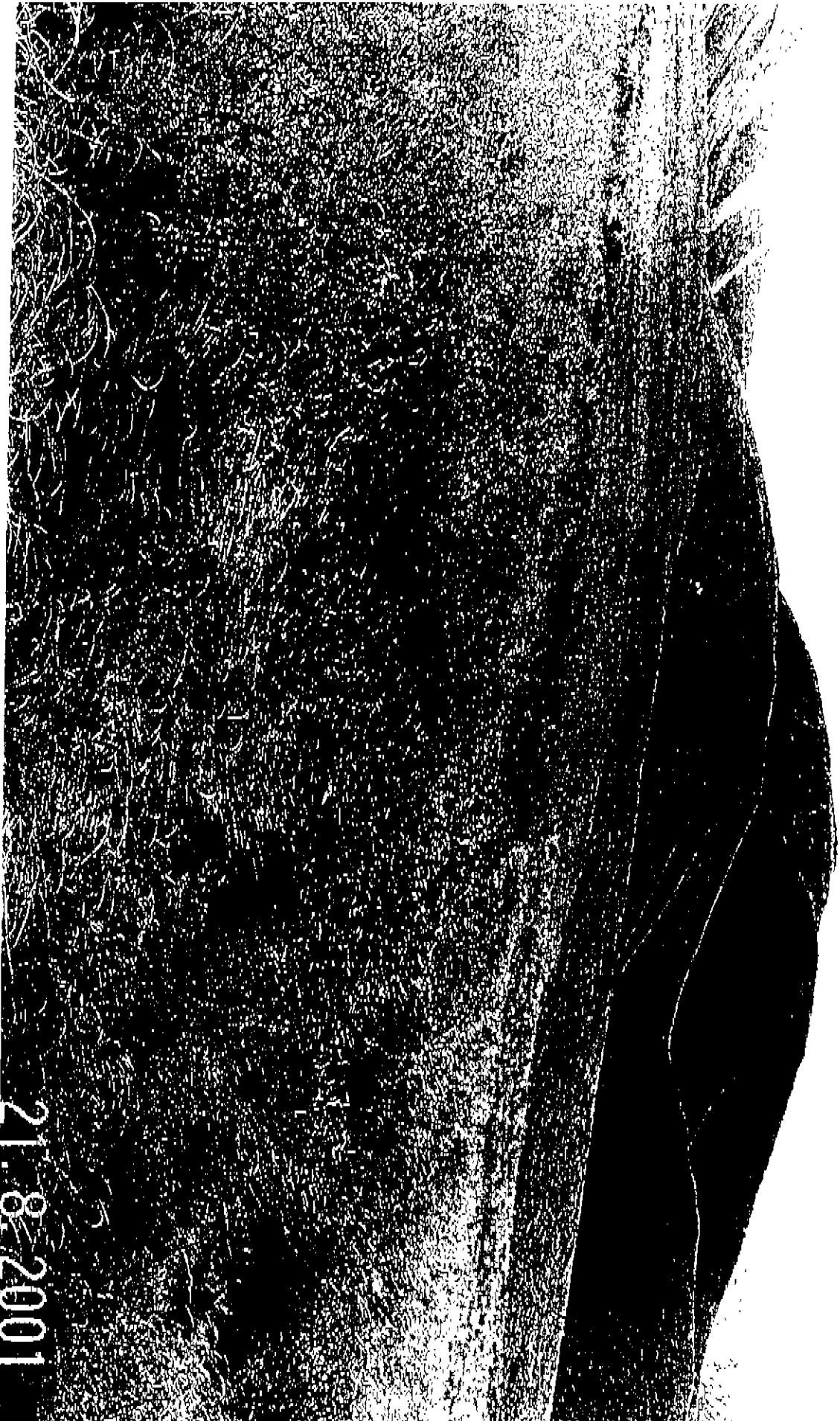
718
HELEN ROAD, OGDEN, N.Z.
OFFICIAL INFORMATION ACT

Clayton Station
South Canterbury



4.8.2001
RELEASED UNDER THE
OFFICIAL INFORMATION ACT

*The Low Claytons provide a feeling of remoteness. This is primarily due to the extensive tussock grassland and the lack of obvious human intrusions**
DOC Conservation Resources Report, August 1999



21.8.2001

“RELEASED UNDER THE
OFFICIAL INFORMATION ACT”

Clayton Station

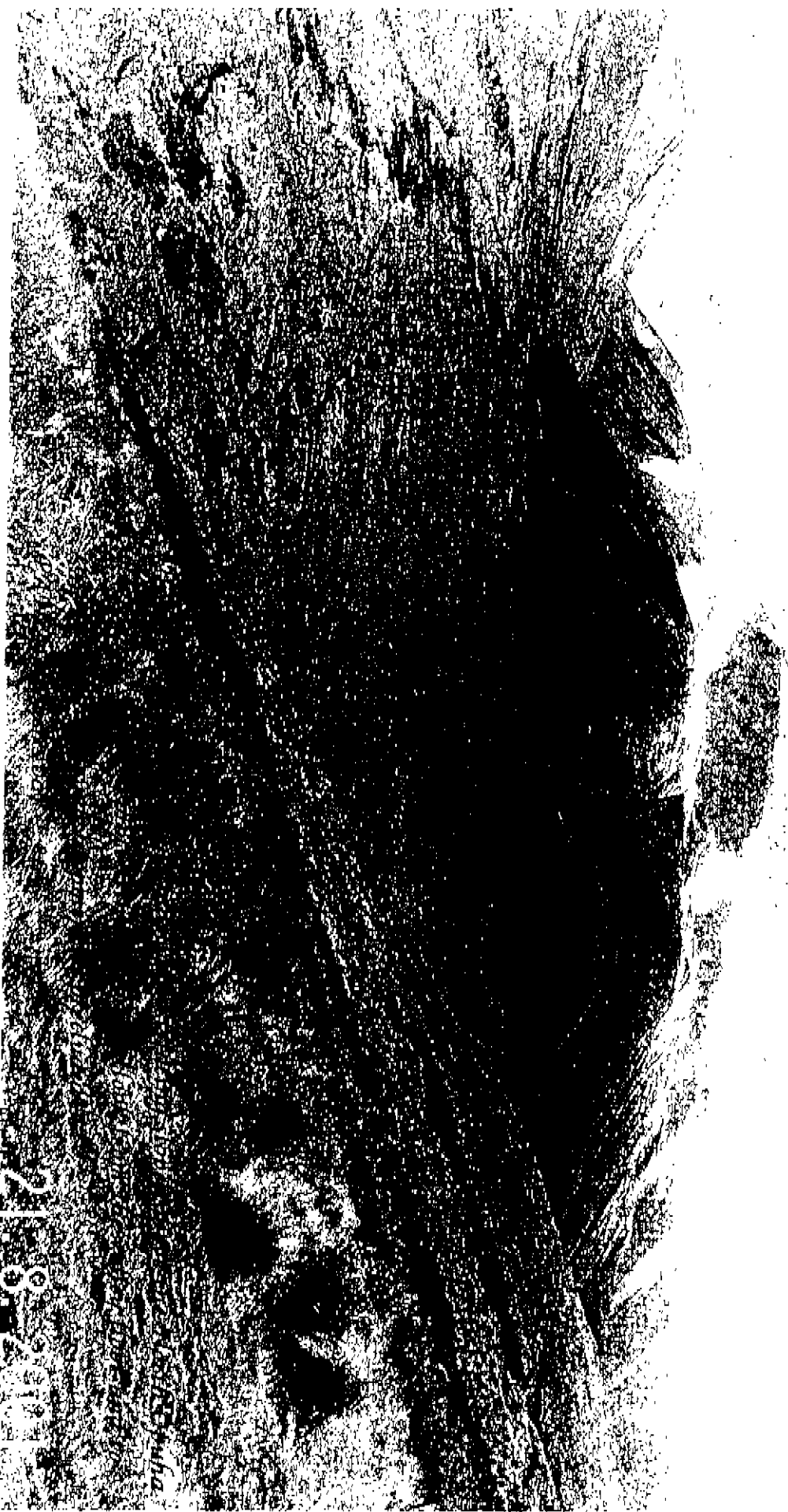
With the potential for forestry on one side of the fence, the natural setting on the other side would be somewhat in this enclosed valley landscape. It is essential that planned conservation areas are buffered from such development. A revised landscape free of sources of exotic weeds and pines, must be preserved.

9/24/02, October 2001



RELEASED UNDER THE
OFFICIAL INFORMATION ACT

Clayton Station
North Opuka River, Ben MeLead Range and wetland (center)
Proposed firehole-conservation area boundary at base of foreground hill.
Possible future land uses for the area to be designated firehole include continued pastoralism or forestry.
Submission on Draft Preliminary Proposal, December 1999.



71-8-2000
RELEASED UNDER THE
OFFICIAL INFORMATION ACT

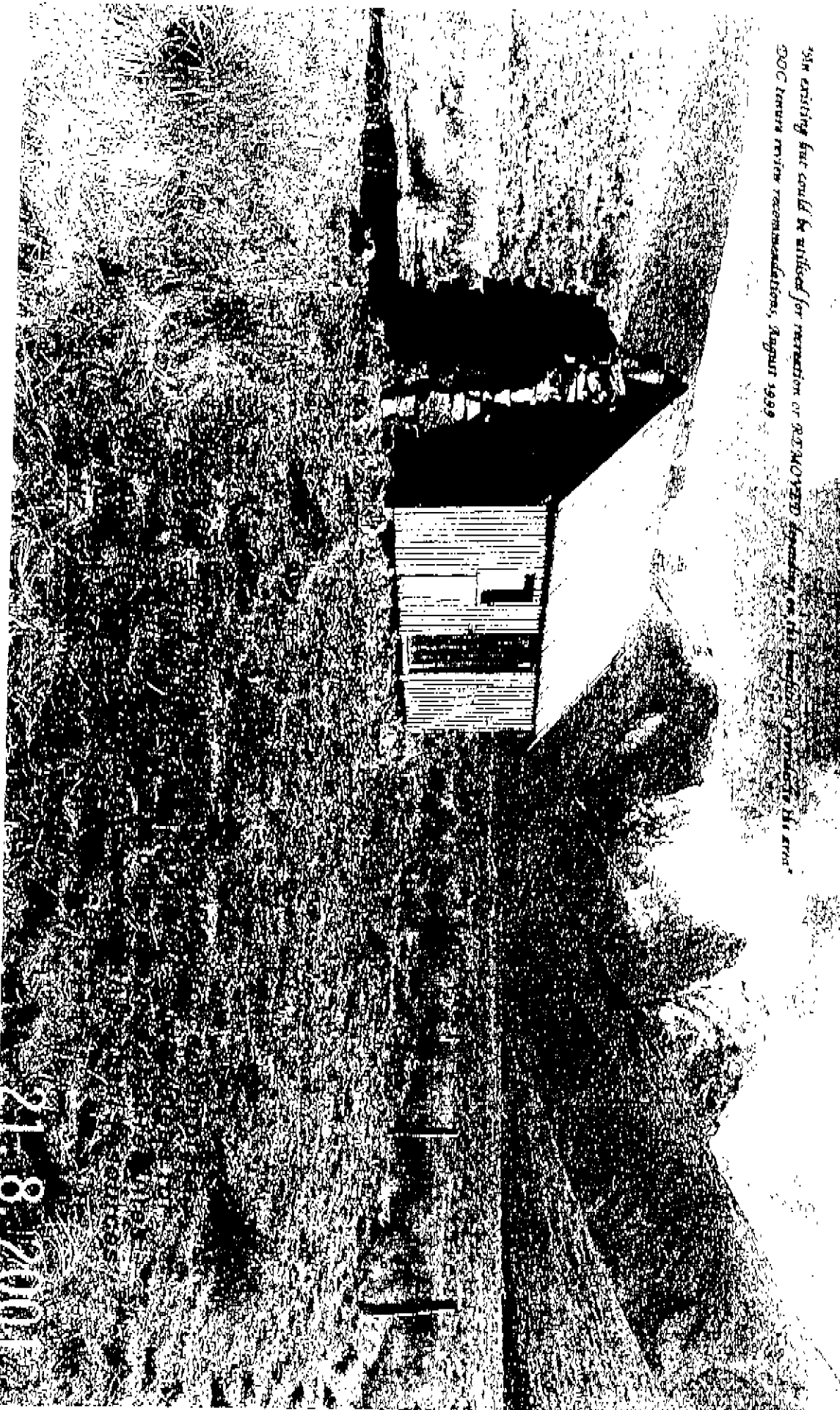
Calypso Station

39 Surface markers' but found no other good by the end Station in 1999

The holder has requested that this be maintained by GOC





Secretary of (interior review) actions to date June 2000

*The existing hut could be utilized for recreation or BLM/NOVATO depending on the location of the hut
GOC needs more recommendations, August 1999*



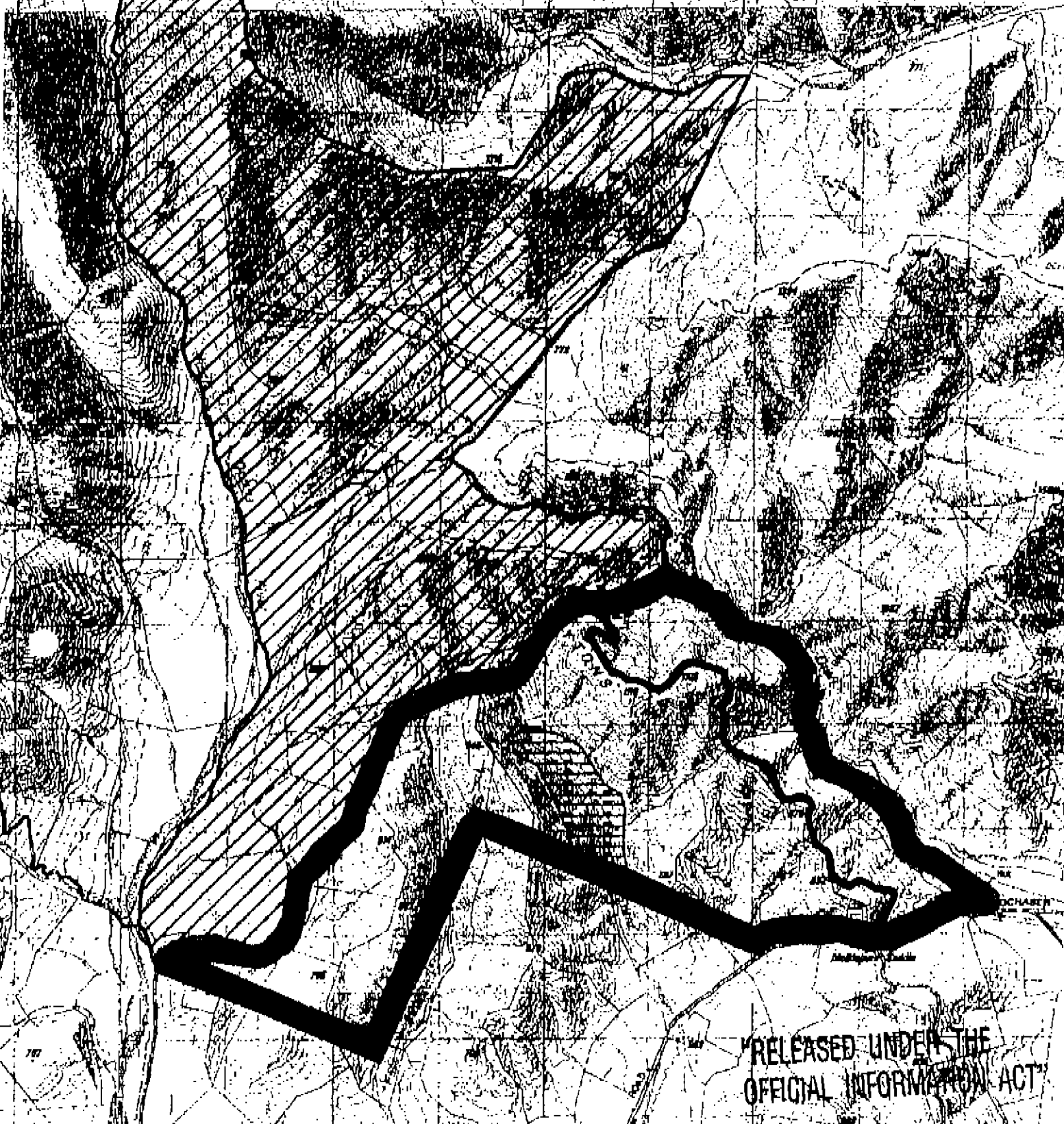
21-8-2001
OFFICIAL INFORMATION ACT

Clayton
DOC Recommendations
Conservation Resources Report
August 1999

-  Clayton
-  Retain in Full Crown Ownership
-  Land Subject to Protective Mechanism
-  Easement (E)

0 0.5 1 1.5 2 Kilometers

Map prepared: 5 March 1999
Topographical map sheet 1:50,000 NZMS 260 J36/J37



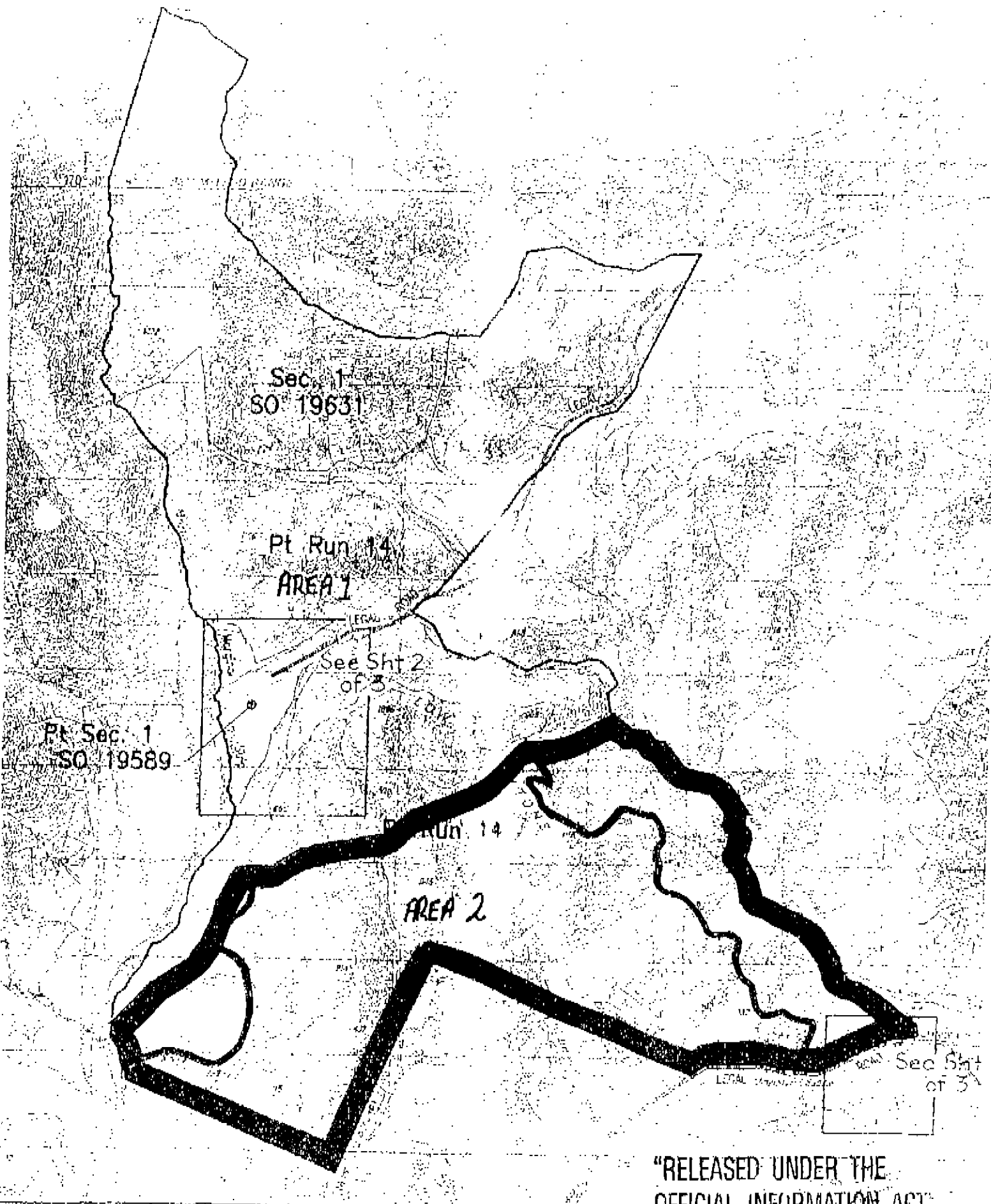
RELEASED UNDER THE
OFFICIAL INFORMATION ACT



Freehold



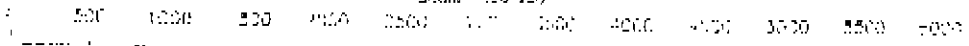
Public Access Easement



"RELEASED UNDER THE OFFICIAL INFORMATION ACT"

Clayton Station

Scale 1:50,000



Version
Canterbury
NZMS 260

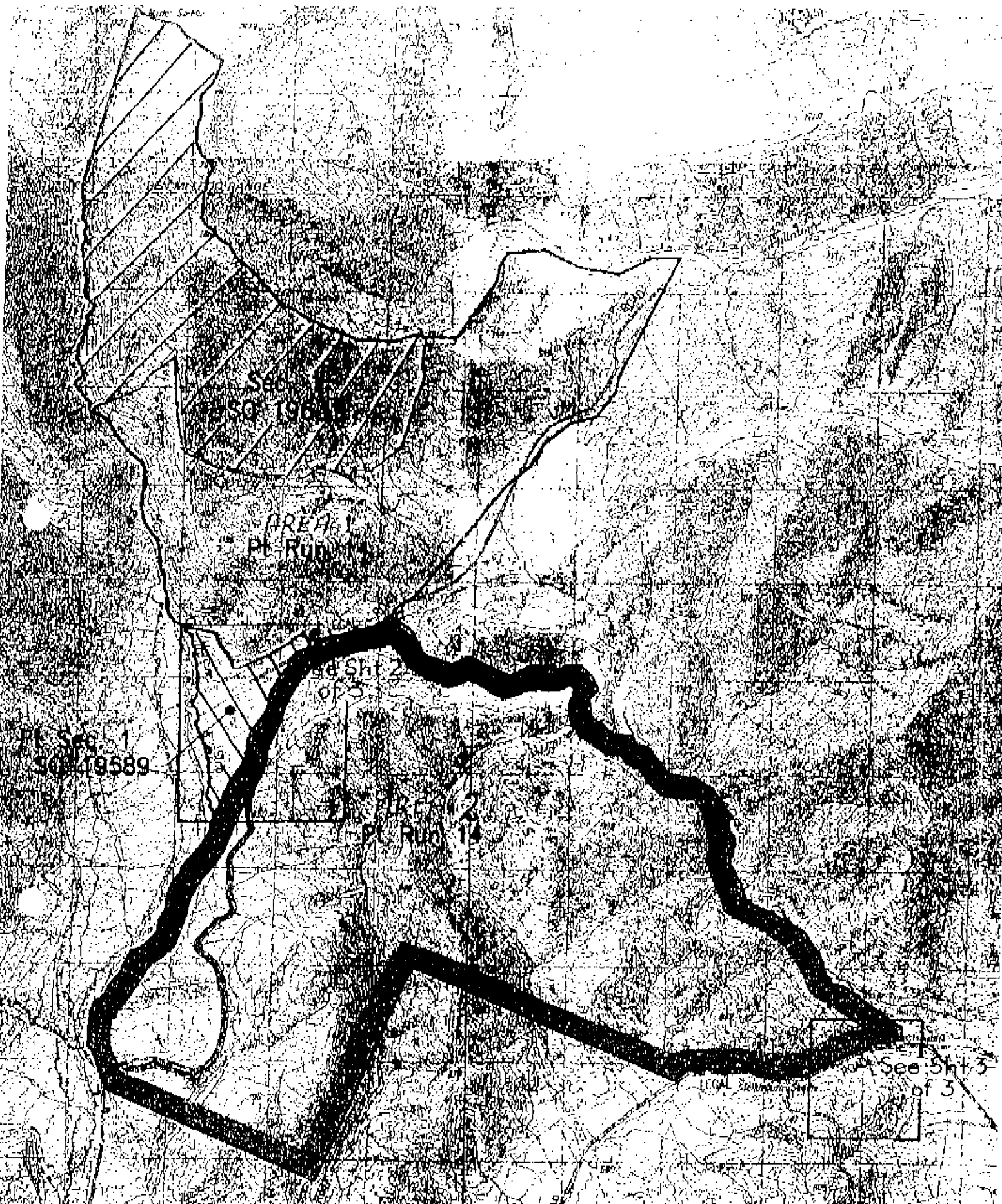
Crown Ownership

**Draft Preliminary Proposal
December 1999**

Public Access Easement

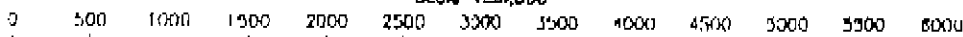
Freehold

2000/01/01



Clayton Station

Scale 1:50,000



Version	
Canterbury L	
NZMS 250	

**Preliminary Proposal
August 2001**

**"RELEASED UNDER THE
OFFICIAL INFORMATION ACT"**

Crown Ownership

Freehold



Public Access Easement

