

Crown Pastoral Land Tenure Review

Lease name: DOUBLE HILL

Lease number: PC 127

Public Submissions

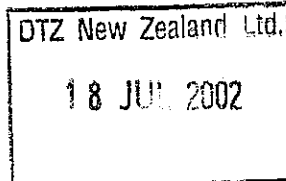
These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

October

05

RELEASED UNDER THE OFFICIAL INFORMATION ACT

271 Centaurus Rd
Christchurch 8002
16 July 2002.



Commissioner of Crown Lands
c/- DTZ New Zealand Limited
Land Resources Division
PO Box 142
CHRISTCHURCH

Dear Sir

**RE: PRELIMINARY PROPOSAL FOR TENURE REVIEW OF
DOUBLE HILL PASTORAL LEASE**

This submission is presented by the Peninsula Tramping Club (Inc). We are one of the larger tramping clubs in Christchurch, with approximately 200 members. We organise over 100 tramps every year, of which a large proportion visit high country pastoral leases. We visit the Double Hill lease once every 1-2 years, primarily to climb Godley Peak and visit Mother Millers Spring, although we have also ascended Smite Peak from the Lake Heron side. We view the Palmer Range as a significant tramping area, since it provides technically straightforward high altitude tramping, with excellent vistas of the Rakaia and Arrowsmith region.

Our club is satisfied with the delineation of areas proposed for full Crown ownership and freehold respectively.

However we have two main concerns over the proposed provision of access via public easements:

1. The proposed provision of public access easements to the Palmer Range are inadequate for recreationists.

We support the proposed foot access 'f' - 'g' - 'h' (in Plan A) providing access to Homestead Hill and beyond. This is a straightforward and attractive route into the central part of the Palmer Range.

We consider however that a second public easement for foot access should be provided further east in the Palmer Range. We understand that an access easement to Turtons Saddle may be negotiated in further tenure reviews. However, this would leave an unreasonably long stretch of the Palmer Range (between Homestead Hill and Turtons Saddle) with no guaranteed public access from the Rakaia valley. This would impose severe constraints on tramping itineraries, and render most of the mid-to-lower northern slopes of the range impractical for tramping parties to visit.

In particular, it would adversely affect the quality of day trips, by almost eliminating the possibility of round trips. The only possible round trip from the Rakaia valley would be a Homestead Hill - Palmer Range - Turtons Saddle route, an unfeasible route for a single day. Additionally contingency planning for tramping trips should be able to rely on adequate exit points from the tops.

RELEASED UNDER THE OFFICIAL INFORMATION ACT

Therefore we suggest the addition of a second public easement for foot access to the Palmer Range, and this should provide access to the tops approximately halfway between the Homestead Hill access and Turtons Saddle. Our preference is the following: From Ensors Road, over the route marked 'f' - 'g' - 'i' (currently proposed as an easement for DOC management). Thence up the slopes between the Glenariffe Stream and Colonel Stream gullies, to allow a route to point 1422 (a spectacular location), ultimately cresting the Palmer Range about 250 m west of point 1884. This route has the advantage, when combined with the Homestead Hill access, of permitting a round trip starting and finishing in the same place (Ensors Road). It would also make feasible round trips encompassing Turtons Saddle, and additionally would allow public access into the forest remnant in the Glenariffe Stream gully. For these reasons, the addition of this easement would greatly enhance guaranteed recreational opportunities in the Palmer Range.

2. We note that the proposal does not appear to provide for easy public access into the lower part of the forested gully of Double Hill Stream (between points 'g' and 'h'). We see the provision of a public foot easement into this gully as important, since it contains one of the few remnants of easily accessible beech / broadleaf forest on the south side of the Rakaia.

Thanking you for the opportunity to make this submission.



Terry Thomsen

on behalf of Peninsula Tramping Club (Inc.)

DTZ New Zealand Ltd.

22 JUL 2002

10 Smacks Close
Papamoa
Ch. Ch. 5

Re. Double Hill Pastoral Lease

Dear Sir,

Personally I do not find this proposal acceptable due to the fact that the land to be received back is absolutely useless.

I would like to propose a reserve for all the land north of the road, up to the Rakaiia River.

On paper the idea that the public is to receive back 4718 ha of land sounds fine but in reality the land is not suitable for any particular use. I very much doubt that Lady Isaac would accept this land that is to be returned to the Crown even if she was allowed to use it for shringle extraction.

The gullies in the north facing slopes have a few scattered trees in them probably because no animal could stand up on the steep terrain. To want to save this land or protect the few trees shows a narrow view of conservation or protection of our environment.

A good case could be made for returning the entire property back to Crown ownership. As soon as you turn into the road leading to the headwaters of the Rakaiia you notice the scars on the hillsides and effects of poor farm management. The eroded hillsides and the gorse and weeds in the main river-bed.

Trees are not the only plants needing protection nor just water, if you have a look around Christchurch suburbs you will see that both the council and house owners are moving more to use of tussocks and

grasses for landscaping as an appreciation of these plants increases. In the past trees have no doubt been preferred for their oxygen giving qualities. As tussocks and grasses become recognized people will find that there is a lack of such land available to enjoy especially on the flat reserve land of the east invariably is hill country, leaving the less physically able people limited opportunities to enjoy this type of landscape.

The fact that some of this land is recommended to become a conservation area shows the importance to parts of of this land to parts of society. The streams are basically being protected due to importance of the salmon and trout fishery.

To have all the land north of the main road to the river included in a reserve would provide recreation facilities for many groups in society.

Double Hill is unique in landscape itself, otherwise the station would not have chosen the name but the fact that the reserve could have a diverse plant life would be of considerable interest. The rivers, swampland trees on the southerly aspects of Double Hill, the tussock tops, the clear views all readily accessible would make this ideal for a conservation reserve.

Double Hill is only a two hour drive from Christchurch and probably less than an hour from Methven, both a source of tourists and holiday makers.

Methven is becoming more recognized as a headquarters for outdoor pursuits in the Canterbury area in the likes of Queenstown. Both will provide increasing numbers of recreationists and the property at Double Hill is able to provide an opportunity for this.

I propose a reserve or park managed by the

Department of Conservation which would follow the existing fence line but basically all land north of the road, to the Rakara river. The reserve should also continue from the Double Hill property into the neighbouring land covering the Glenaville stream, following this riverbed down to the Rakara river.

This land would make a great reserve - over a period of years and would have both landscape and environmental attractions.

With the coming and going of the Kyoto agreement and the need for less pollution caused by animals this area would be a great asset for nearby landowners.

The land could be used for mountain biking and horse riding as well as having walking tracks.

A recent programme on T.V. showed the loss of women from Outback Australia to the cities due to the lack of careers or opportunities to keep these women on the land. In the N.Z. we have the much publicised lack of women in Middlemarch or in the small towns of Otago and Southland.

These problems will continue but by re-creating or other areas of opportunity provided by the high country such as turning this land into a reserve and providing recreation pursuits with accommodation and homestays this would provide job opportunities as well as public contact encouraging women to remain in the area.

Regards
Geoff Clark.

Pc 127/1

RELEASED UNDER THE OFFICIAL INFORMATION ACT

DTZ New Zealand Ltd.
24 JUL 2002

GERALDINE TRAMPING CLUB

JULY 22 2002

D.T.Z. NEW ZEALAND.
P.O.BOX. 142
CH.CH

Attention GEOFF HOLGATE.

Noted	20934
Action by	G.H
Recorded	EL
Enq. de	
File Ref	

TENURE REVIEW DOUBLE HILL

The GERALDINE TRAMPING CLUB have a continuing interest in the pastoral high country, and like many other recreational groups, are regular users of these areas, access to which is dependent upon a legal right of way and Runholder permission to gain admittance. We therefore have a high vested interest in the TENURE REVIEW process, wishing to maintain our ability, and those of future generations, enjoyment of what is our heritage.

We have read DAVID HENSON's comprehensive submission on the D.O.C. proposal (Pc 127/1) on DOUBLE HILL Pastoral Lease, and are in general agreement the points that he makes, :-

- (1) To support the D.O.C. proposal to transfer land outlined in their Draft ... "when added to the land in the expired DOUBLE HILL P.O.L. ... making a coherent block of mid and high altitude land ... The proposed boundary with freehold land... follows the existing fenceline..."
- (2) To agree with D.O.C.'s conservation and resource report, and that access to the peaks above DOUBLE HILL are regularly undertaken, but also, to the GERALDINE TRAMPING CLUB, (GTC), access into and through the North Branch of the ASHBURTON RIVER and the peaks above, is of prime importance.
- (3) Access to Conservation Land through freehold land. We can see the point in multi access points, but for accident or extreme weather any safe route out legal or otherwise is acceptable.
- (4) Access from the SOUTH ASHBURTON Valley, we agree with the points made here.

In addition, where the HENSON REPORT favours only foot access for the Public, and on some easements where D.O.C. have vehicle access, the G.T.C. submit that any rights for Departmental vehicles should also apply to Public, and seriously considered on any of the other access points. There are many older members of the Public Tramping Clubs, etc, where the ability to drive further in from the main roadway will allow more practical means to enjoy the less easily accessible parts

There are many unformed legal roads throughout these areas, they seemed to have been ignored in the D.O.C. report. G.T.C. feel these should be recognised, and documented, as they have a continuing existence within the TENURE REVIEW, and wherever practical, used as a starting point for Public access.

GERALDINE TRAMPING CLUB
RELEASED UNDER THE OFFICIAL INFORMATION ACT

We trust these thoughts will be of assistance in negotiating a final Review Proposal and that the outcome will allow all recreational users to enjoy the area for it's intrinsic worth.

Yours faithfully,

THE GERALDINE TRAMPING CLUB.

F. D. THOMAS.

Liasion Officer.

RELEASED UNDER THE OFFICIAL INFORMATION ACT



FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)
P.O. Box 1604, Wellington.

BARBARA MARSHALL
SECRETARY
PH/FAX (04) 233-8244

Noted	20961
	RL
	RL
File Ref	

FACSIMILE TRANSMISSION

DATE: 26 JULY 2002

FACSIMILE NUMBER (03) 379-8440

TO: DTZ ATTN; ROGER LOUGH

FROM: BARBARA MARSHALL

RE: **DOUBLE HILL PRELIMINARY PROPOSAL**

-1- No. of pages (including this one) being sent in this transmission. If you do not receive the standard number of pages, please advise immediately. My facsimile number (Fax and phone) is (04) 2338-244.

Dear Roger Lough

In accordance with our telephone conversation this morning, I confirm that an error was made in our letter and submission by using the word 'draft'. I also confirm that our submission was made on the Preliminary Proposal.

Thankyou for your assistance in this matter.

Yours sincerely

Barbara Marshall
Secretary

cc Department of Conservation, Christchurch Conservancy

RELEASED UNDER THE OFFICIAL INFORMATION ACT

FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)
P.O. Box 1604, Wellington.



Ph & Fax (04) 233-8244

22 July, 2002

Commissioner of Crown Lands
C/- DTZ New Zealand Limited
Land Resources Division
PO Box 142
CHRISTCHURCH

DTZ New Zealand Ltd.
25 JUL 2002

Noted	20945
Action by	KL
Recorded	EL
Drop date	
File ref	

Re: **DRAFT PRELIMINARY PROPOSAL FOR TENURE REVIEW OF
DOUBLE HILL PASTORAL LEASE**

Enclosed is our submission on this proposal.

Please note we have been given an extension of the closing date from 18 to 26 July. This was arranged by Jean Greedy of LINZ owing to late supply of relevant official information.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Barbara Marshall', is written over a horizontal line.

Barbara Marshall
Secretary



RELEASED UNDER THE OFFICIAL INFORMATION ACT
FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)
P.O. Box 1604, Wellington.

A SUBMISSION ON THE DRAFT PRELIMINARY PROPOSAL FOR TENURE REVIEW OF DOUBLE HILL PASTORAL LEASE



TRAMPERS ON GODLEY PEAK

THE VIEW IS LOOKING SOUTH WEST TO MT CATHERINE AND LAKE HERON

DOUBLE HILL PASTORAL LEASE

Our Interest in this Tenure Review

Federated Mountain Clubs of New Zealand (Inc) is the national association of mountain recreation clubs. We have been established for 71 years and have 98 member clubs and groups with approximately 12,000 individual members. In Canterbury, we have 15 member clubs and groups with approximately 2000 members. Many of these are regular users of the pastoral high country.

For more than 20 years, FMC has campaigned for reformation of the pastoral lease system to allow farming where sustainable and return of the bulk of high land to the Public Estate. We have no doubt that many of the wider public share our vision for the future South Island high country.

Recreational Overview – The Ashburton High Land

The DOUBLE HILL Tenure Review is part of a wider land use issue.

From a recreational viewpoint the block of high land bounded by the upper Rakaia River, the upper South Ashburton River and the plains is a single geographical unit. It is wedge shaped and comprises the Mt Hutt and Pudding Hill Ranges, Black Hill Range, Mt Somers and Old Man Ranges, Taylor Range and Palmer Range.

Our Patron is Allan Evans of Temuka. For many years he worked as the engineer and planner for the then South Canterbury Catchment Board. In 1963 he wrote a detailed report for his Board, recording the excessive erosion in the upper Ashburton catchments. He recommended destocking the high country with remedial works in streams. This was part of the growing awareness of the need to conserve water and soil in the high country. About 25 years ago FMC began to question the right of runholders to hold vast tracts of public land, with trespass rights, where grazing had limited production value but caused much damage. Allan Evan provided a summary of his 1963 paper to the Department of Conservation when the south bank Rakaia group of runs were listed for "early warning" in 1997,

Consequently for 20 to 30 years, FMC and its member clubs have advocated return of the high land in this unit to the Public Conservation Estate so that its natural and landscape values may be protected and so that it is freely available for public recreational use. Actual change began some years ago when the high altitude Double Hill and Glenariffe Pastoral Occupation Licences (POLs) expired. This land is currently Crown Land administered by the Commissioner of Crown Land (CCL) but should become Conservation land as tenure review proceeds.

Apart from Double Hill, other properties flanking this area are under-going tenure review. These are Glenariffe, Glenrock and Redcliffe. These are all in the Rakaia catchment and should eventually provide a continuous band of public land above the south bank of the Rakaia River.

Double Hill – Land to be returned to Full Crown Ownership

We support the proposal to transfer land as outlined in the draft proposal to the conservation estate. When added to the land in the expired Double Hill POL this will make a coherent block of mid and high altitude land which will provide a significant

RELEASED UNDER THE OFFICIAL INFORMATION ACT

step towards the aims stated above. The proposed boundary with freehold land appears logical in that it follows the existing fence line.

The Department of Conservation's Report & Recommendations

FMC agrees with and supports part of DOC's Conservation Resources Report. The sections on Landscape, Landforms and Geology, Vegetation and Fauna are detailed and accurate.

HOWEVER, we consider the section on Recreation is inadequate because of insufficient knowledge of recreational use in the area. This states:

"There is currently little recreational use of Double Hill. The area beyond Turton's Saddle and in the North Branch of the Ashburton River has some use for tramping parties gaining access to the lower reaches of the Ashburton River. The terrain on the tops of the expired POL is not technically interesting for climbers but has basins easily accessible from Mt Hutt and Glenfalloch for heli-skiing"

In fact several tramping clubs in Canterbury have a tradition of high altitude tramping on most of the higher ranges to the east of the main divide. This involves physically (but not technically) demanding climbs to main summits. These are often done in winter or spring when the snow cover makes the country more interesting. Popular destinations in the Rakaia area are Godley Peak (which is accessed from Double Hill), Black Hill and Steepface Hill (on Glenrock). Similarly, Mt Taylor is the highest point in Canterbury east of the Southern Alps. Consequently it provides a special challenge but unlike the Rakaia summits named above it is approached from the South Ashburton River near Lake Heron.

FMC made a brief submission dated 10 July 1998 (**appendix A**). This was sent after the original DOC report was written on 27 May 1997 but was in time for their later recommendations written on 3rd August 1999. It stated there was regular use of the high country above Double Hill but this was ignored in the later DOC paper.

Our **appendix B** has photos showing typical recreational use of the area and our compiler is supplying a list (**appendix C**) of tramps undertaken by his own club in the wider area covered in our introduction. This gives a better picture of overall use of the area. Trips on or across Double Hill itself are highlighted in block letters. Note that this is only a fraction of use of the area and should be taken as only an example. There are several other clubs in Canterbury who run comparable programmes as well as trips by private groups and total use will be much higher than listed.

We have gone to some length to point out the level of use because it relates to the need for access routes across freehold to high land on both Double Hill and other pending reviews. Proposed access on Double Hill is clearly inadequate and we will comment in detail below.

Comments on details of the Draft Proposal:

1. Access to High Conservation Land through proposed Freehold Land.

Only one route is provided. This is from Ensor's Road to Homestead Hill – delineated as f-g-h in the proposal.

This is inadequate because:

RELEASED UNDER THE OFFICIAL INFORMATION ACT

A. The mountains above the south bank of the Rakaia Valley comprise three distinct "blocks" of high land with intervening saddles. These blocks are:

- Between Lake Stream and Turton Saddle.
- Between Turton Saddle and Redcliffe Saddle.
- Between Redcliffe Saddle and Mt Hutt.

Consequently each block will require at least two and possibly three or more access routes as tenure review proceeds. This is because trampers prefer to climb by one route then traverse part of the tops and return by another. Also a minimum of two routes are needed for safety in case of bad weather.

Access from Double Hill,

We agree in principle with the route f-g-h to Homestead Hill. However it is not clear that this provides a clear and open route to the tops above Homestead Hill. Point h, is well below Homestead Hill and if the route crosses the fence here into the conservation land it may provide more difficult travel than on the west of the fence. We request that this detail be checked on the ground.

For the reasons given above, a second access route is needed. This should follow the management easement from Ensor's Road to the foot of the large bush gully at grid reference 718644 then up the spur east of the gully to reach the boundary fence at GR724627. This is similar to DOC's original proposed access. It is normal to descend from Godley Pk via the ridge over pt 1422 to this point.

If climbing Godley Pk in summer, it would be usual to ascend via Homestead Hill and return this way. If climbing in winter it would be normal to both ascend and return via this second route because the shorter daylight hours make the round trip impossible.

The proposed access to Turton's Saddle (on Glenariffe) will be valuable. However in terms of tramping geography it is more useful for access to Black Hill and is too far east for reasonable access/exit to the Godley Peak area.

We also note that there is no proposed public access to any of the bush gullies along the Double Hill faces. This is unreasonable as these are interesting gullies in their own right in an area where bush is notably scarce. We request that access be provided to the bottom of the bush gully immediately east of Homestead Hill by providing a short access route as a spur from the main route.

2. Access from the South Ashburton Valley

DOC's recommendations of 3.8.99 state an intention to

"Ensure there is practical foot access to the upper Smite River along the river bed (this may be either on Crown Land or Upper Lake Heron pastoral lease) and look at future access to the Swin River (on Clent Hills Station)"

We consider that access via the Swin River is just as important as access via the Smite River and should be ensured rather than only considered. Note that this access is necessary for reaching the large area of land in the south and south west of the present lease and POL. It will also allow cross country travel to Round Hill Creek and other streams draining into the North Ashburton River.

RELEASED UNDER THE OFFICIAL INFORMATION ACT

However, and more to the point, while the DOC report comments on access from this side of the range, the Draft Proposal itself makes no provision for such access.

We consider that if additional access to the Godley Peak, tops (described above) and access via both the Smite and Swin Rivers is not provided, the draft proposal will not meet the requirements of the Crown Land Pastoral Act, S. 24 (c) (1). This is because the access proposed at present is not sufficient to provide safe and reasonable access to all parts of the public land under review.

3. Other Access

We agree with all the other proposals for providing formal access including ensuring that the formed road beyond Double Hill actually provides legal access to Glenfalloch and the Rakaia River opposite Manuka Point. It is not clear that the access to Manuka Point at "I" actually crosses the boundary of the property to the river bed but we assume this is an inaccuracy in the map.

However, we note that both the Due Diligence Report and the DOC recommendations state that marginal strips should be laid off on the freehold land. The draft proposal gives no indication of where these will be. We consider that as a minimum strips are needed on the bank of the Rakaia River where it forms the freehold boundary and also along Double Hill and Glenariffe Streams where they run through the freehold land on the flats.

The provision of access across the Double Hill freehold will be complex and will require careful signing. We suggest that, as a minimum, there should be a notice board where the road enters the property listing access on the flats. In addition there should be a notice near the homestead listing access to the high land.

4. Landscape Covenants

The original recommendations by the Department of Conservation (27.5.97) proposed extensive landscape covenants on much of the flat land and Double Hill (the hill itself). These have disappeared from DOC's later (post C.P.L.A.) recommendations of 3.8.99 but the later proposals include smaller areas of land which will become conservation land within the main freehold.

We consider that there should be a landscape covenant over all the actual elevated land on the double hills of Double Hill. This is because it is a prominent landscape feature which would be degraded by changes such as pasture development or afforestation.

Thank you for the opportunity to comment. We look forward to a successful conclusion to this review.

DAVID HENSON
FMC Tenure Review Facilitator, North Canterbury.
20.7.02

RELEASED UNDER THE OFFICIAL INFORMATION ACT **APPENDIX A**

FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)
P.O. Box 1604, Wellington.

Monavale Road
RD 14
CAVE

10 July 1998

Double Hill Pastoral Lease

A report on proposals for recreation and public access as part of the Tenure review process.
Prepared by Federated Mountain Clubs of New Zealand (Inc.) in consultation with users of the area.

Introduction

Double Hill is a 7800 hectare property on the South bank of the upper Rakaia River. It is an awkward shaped property with much of the property extending some 6 - 8 kms along the Rakaia River. The rest stretches as a hooked shaped area over Turtons Saddle, down Turtons Stream to the North branch of the Ashburton River over Clent Hills Saddle, down the Swin River in the Lake Heron Basin and back up the Smite River and Godley Stream.

Inside the 'hook' is a large area of conservation land - formerly Double Hill Pastoral Occupation License which is not fenced off except in the 'front' area facing the Rakaia River. This is not satisfactory.

Apart from limited areas in the valley floors and lower valley sides which are impractical to fence, there is little land that should be used for grazing beyond Turtons Saddle.

It is FMC's belief that all land above the high fence on the Rakaia fences not in the conservation area, and all land beyond Turtons Saddle should be retired for the protection and restoration of their inherent natural values. However in the Lake Heron Basin in and between the Smite and Swin Rivers there is some productive land that could logically be incorporated into adjoining properties.

Recreational Values

In the retired country behind the property are numerous mountain peaks in the 5500 - 7000 range that are not technically difficult. These get a moderate amount of use. Trampers use this area, and a limited amount of hunting is done.

The pastoral lease itself is used mainly to access this conservation area, and for tramping through from the Rakaia to the North branch of the Ashburton River or the Lake Heron Basin (or vice versa). This higher land including the recommended area for retirement has great potential for more climbing and tramping as well as horse trekking and mountain biking.

On the rest of the property in the Rakaia River area there is popular fishing in both the Rakaia River and the Double Hill and Glenariffe Streams. Duck shooting also occurs on this lower area.

Federated Mountain Clubs of New Zealand is the national alliance of tramping, walking, climbing, skiing and deerstalking clubs; 96 clubs representing 14,000 members. Club members working for clubs on issues of access, protection and wise management of our public lands, and the promotion of our sports.

RELEASED UNDER THE OFFICIAL INFORMATION ACT**Public Access Requirements**

There are some unformed legal roads on the property. One runs up the Smite River. Another one up the Swin River over Clent Hills Saddle and down Round Hill Creek but doesn't appear to join up with the one that runs up Turtons Stream and over Turtons Saddle. This latter one is mainly on neighbouring Glenariffe pastoral lease and generally doesn't follow the 4WD track. Over Turtons Saddle on the Rakaia side it links up with marginal strips that pass through to the highway. This access from the road to Turtons Saddle should be checked to ensure it is practical.

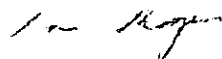
Access to the recommended surrender land from the Double Hill road is needed in at least two places other than the Glenrock Stream / Turtons Saddle one. These must be practical easements for foot, horse, and mountain bike traffic and could logically be up besides existing fences (on spurs rather than up difficult creeks) to minimise any disturbance to farming activities.

The Glenariffe and Double Hill Streams have no legal access and need marginal strips to allow access for anglers.

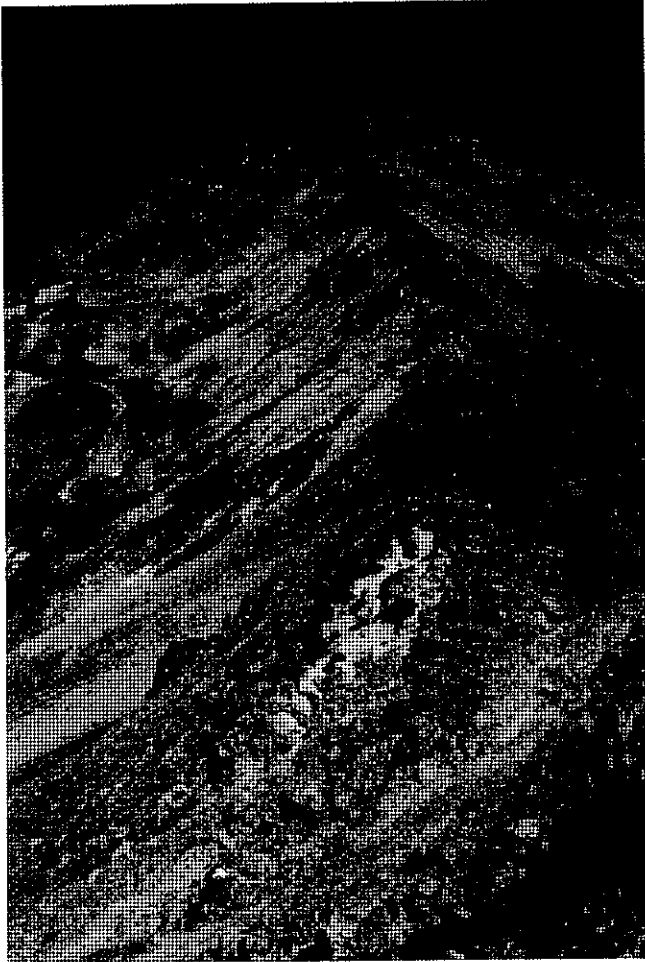
Access to the Rakaia River is by legal road from Double Hill Road. This may not correspond with the track that is used and needs to be formalised to allow vehicle traffic to reach the river.

Recommendations

- 1) All land above the high fence on the Rakaia River faces and beyond Turtons Saddle be retained by the Crown. Suitable land in and between the Smite and Swin Rivers could be incorporated into adjoining properties, but legal roads retained and marginal strips laid off up both rivers. All the rest of the property could be freshholded with the exception of PNA's and RAP's
- 2) Legal access via marginal strips / legal roads to Turtons Saddle be sorted out to ensure practical access is available and this must be marked.
- 3) A minimum of two widely spaced access easements to the recommended retirement areas from Double Hill road be negotiated.
- 4) Vehicle access to the Rakaia River be sorted out marked and legalised.
- 5) Marginal strips laid off up Double Hill and Glenariffe Streams.



Ian Rogers
Consultant



Party approaching Godley Peak from the west



Peninsula Tramping Club party on summit of Godley Peak. Looking up the Rakaia Valley.

RELEASED UNDER THE OFFICIAL INFORMATION ACT

APPENDIX C

**TRAMPS RUN BY THE CHRISTCHURCH TRAMPING CLUB
IN THE UPPER ASHBURTON RIVER AND SOUTH BANK RAKAIA DISTRICT
FROM 1991 TO 2002**

Date(s)	Tramp	No. in party	Run or area	Leader
22 Sept 91	Mt Winterslow	6	Winterslow	B. Abley
6 Oct 91	Godley Pk	9	Double Hill	S. Bruerton
19 Jan 92	Pudding Hill Stm	13	Mt Hutt Forest	D. Jenkinson
8 Nov 92	Pudding Hill Stm	8	Mt Hutt Forest	M. Newlove
18 April 93	Steepface Hill	6	Glenrock	B. James
17 April 94	Godley & Moorhouse Pks	8	Double Hill	K. Dekkers
6 Aug 94	Black Hill	2	Glenrock	M. Southerwood
19 Feb 95	Steepface Hill	10	Glenrock	B. James
30 April 95	Godley Pk	9	Double Hill	J. Easton
30 April 95	Redcliffe Saddle	7	Glenrock	S. Keenan
18 June 95	Mt Taylor	14	Clent Hills	F. King
1 Oct 95	Black Hill	10	Glenrock	M. Southerwood
14 Jan 96	Steepface Hill	12	Glenrock	B. James
23 June 96	Black Hill	7	Glenrock	M. Plug
30 Nov 96	Steepface Hill	5	Glenrock	S. Brasch
1-2 Feb 97	Mt Taylor	4	Clent Hills	M. Stewart
16 Mar 97	Pudding Hill Stm	8	Mt Hutt Forest	D. Jenkinson
16 Mar 97	Mt Hutt - Steepface Hill	9	Glenrock	S. Leckie
31 Aug 97	Black Hill	11	Glenrock	S. Smith
24 Jan 98	Godley & Moorhouse Pks	10	Double Hill	F. Roberts
5 April 98	Black Hill	5	Glenrock	J. Easton
21 Feb 99	Mt Hutt - Steepface Hill	11	Glenrock	A. Sullivan
20 June 99	Mt Taylor	9	Clent Hills	J. Easton
2 Oct 99	Turton Saddle	9	Double Hill	A. Turton
5 Dec 99	Steepface Hill	12	Glenrock	P. Eman
8 April 2000	Redcliffe Hill	19	Glenrock	D. Henson
27 May 00	Black Hill	3	Glenrock	P. Ashton
8 July 00	Godley Pk	7	Double Hill	A. Brown
5 Aug 00	Mt Winterslow	11	Winterslow	J. Western
16 Sept 00	Mt Catherine	7	Upper L. Heron?	A. Sullivan
28 Oct 00	Mt Winterslow from Sharpin Falls	5	Alford Forest, Winterslow	I. Dunn
25 April 01	Mt Winterslow	10	Winterslow	B. James

Notes: 1. Tramps on Double Hill are shown in **block letters**.

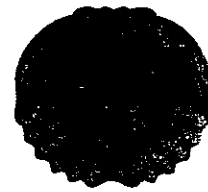
2. Tramps were scheduled to Godley Pk on both 10.6.01 and 23.9.01 but were cancelled or diverted elsewhere owing to bad weather.

3. List does not include tramps up Mt Somers or on the Mt Somers Walkway. This area is visited 2 to 4 times each year.

RELEASED UNDER THE OFFICIAL INFORMATION ACT

Royal Forest and Bird Protection Society
PO Box 2516
Christchurch Mail Centre
Ph 03 3666 317
Fax 03 3660 655

DTZ New Zealand Ltd.
29 JUL 2002



**FOREST
& BIRD**

ROYAL FOREST AND
BIRD PROTECTION
SOCIETY OF
NEW ZEALAND INC

25 July 2002

Commissioner of Crown Lands
C/o DTZ NZ Ltd
Land Resources Division
PO Box 142
Christchurch

Number	20977
Issued by	RL
Recorded	[Signature]
Group Date	
File Ref	

SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR DOUBLE HILL, SOUTH BANK OF RAKAIA RIVER

1. INTRODUCTION

The Royal Forest and Bird Protection Society (Forest and Bird) is New Zealand's oldest and most active voluntary conservation organisation. Formed in 1923 the Society has around 38,000 members in 56 branches around New Zealand. This evidence is on behalf of the Central Office. The Society's constitution requires it to:

"take all reasonable steps within the power of the Society for the preservation and protection of indigenous flora and fauna and natural features of New Zealand for the benefit of the public including future generations."

"Protection of natural heritage includes indigenous forests, mountains, lakes, tussocklands, wetlands, coastline, marine areas, offshore islands and the plants and wildlife found in those areas."

2. PRELIMINARY PROPOSAL

Forest and Bird understands the preliminary proposal for Double Hill to be:

1. The restoration to full Crown ownership and control as conservation land of around 4,718 ha in the upper catchments of Double Hill, Glenariffe and Colonel Streams. the high altitude north facing slopes of the Palmer Range including Turtons Saddle, the catchment of Round Hill Creek, the upper catchment of the North Branch of the Swin River, the Smite/Godley catchment, and the lower west facing slopes of Mt Catherine.
2. The restoration to full Crown ownership and control as conservation land of four smaller areas totalling around 179 ha including shrubland remnants on the roche moutonee "Double Hill", a wetland at the mouth of the "notch" on Double Hill, the lower reaches of Double Hill Stream between the formed road and the eastern boundary and a deep incised gully in the faces above Glenariffe Stream. This is to be subject to an easement concession for stock, machinery and farm access.
3. The freeholding of 2780 ha of pastoral lease land to Double Hill Station Ltd subject to easements.
4. Various public access easements.

RELEASED UNDER THE OFFICIAL INFORMATION ACT

3. GENERAL COMMENTS

Forest and Bird generally supports the preliminary proposal and the proposed boundaries between new conservation and freehold land and congratulates all the parties involved. Double Hill is part of a spectacular and outstanding landscape. Turtons Saddle area, the high Rakaia faces, Glenariffe-Double Hill Streams, Round Hill catchment, Smite and Godley Valleys, the lower slopes of Mt Catherine and part of the Double Hill roche moutonnee will be a significant addition to the conservation estate. It is disappointing, however, that the proposal does not protect the outstanding landscape and natural values on the lower Rakaia faces and the valley floor fans and flats through a covenant prohibiting exotic forestry.

4. COMMENTS ON SPECIFIC ELEMENTS OF THE PROPOSAL

1. Marginal strips should be shown

Marginal strips are not shown on any of the maps which are part of the preliminary proposal or on any other material released under the Official Information Act. The Department of Conservation advised the Commissioner's agent that *"it is unable to provide unequivocal advice on whether or not marginal strips will apply to the streams on Double Hill pastoral lease."*¹

Forest and Bird is concerned that if proposed marginal strips are not clearly identified in the preliminary proposal, they may not be laid off. A large amount of work and checking of legal status goes into the development of preliminary proposals. Standard Operating Procedures are used to help ensure all legal formalities are completed in the appropriate order and to timelines.

If identification, survey and laying off of marginal strips is left to DoC to do **after** each individual proposal has been finalised and signed off by LINZ and the Commissioner, this creates a heavy financial burden on DoC because of the survey costs involved. It also risks creating a sizeable backlog of survey work which is not urgent, because there is no deadline, and which is left undone in the face of other priorities and "falls between the cracks." Years later members of the public may face difficulties in getting access along a waterway because no marginal strip exists.

The history of land improvement agreements in Canterbury has been that considerable areas have not been retired and due legal processes completed, despite fencing and development grants to landholders. Public Access New Zealand has raised concerns over DoC and the Commissioner's failure to lay off marginal strips, as section 24 of the Conservation Act requires, when Canterbury pastoral leases have been renewed.

While the marginal strips do not take effect until the freehold is transferred to the current lessee, identifying and mapping them on the preliminary proposal would assist submitters. It would enable gaps in public access to or along waterways to be determined and additional easements sought if necessary. It would also provide a check to ensure marginal strips are established.

There is no point in DoC and the Commissioner preparing and using voluminous SOPs for tenure review if these do not ensure that s24 of the Conservation Act is implemented and

¹ Report on matters relating to a proposed conservation covenant – Double Hill pastoral lease" 26/10/00 from Roger Lough to LINZ.

3

RELEASED UNDER THE OFFICIAL INFORMATION ACT

marginal strips are laid off as an integral part of the tenure review process. The field inspection, legal checking and survey costs should be a legitimate part of tenure review.

Decision sought

That the Commissioner direct his agents and DoC to:

- a) identify and map likely marginal strips as part of each preliminary proposal notified for public comment; and
- b) survey, conclusively identify and lay off marginal strips as part of the tenure review process with this having to be done before the legal formalities for tenure review of individual properties are completed.

2. Public access easements

Forest and Bird supports the submission on the preliminary proposal by David Henson (20.7.02) for Federated Mountain Clubs and the request for additional access to the Godley Peak tops and via the Smite and Swin Rivers.

FMC has demonstrated that there is already considerable recreational use of the area. The spectacular landscapes of the area and their relative proximity to Christchurch mean that increased recreational use is likely. The land's status as pastoral lease means that it has not been extensively promoted. Once the conservation status of these areas is publicised their popularity is likely to increase.

Decision sought

Provide an additional easement for a second access route to the Godley Peak tops from Ensors Road to the foot of the large bush gully at grid reference NZMS 260 K35 grid reference 718 644 then up the spur east of the gully to reach the boundary fence at grid reference 724 627 as requested by FMC.

Ensure there is practical access to the upper Smite River and to the North Branch of the Swin River.

3. Sustainable management covenants needed to prevent exotic forestry

The Double Hill roche moutonee, the valley floor fans and flats, and lower faces of Double Hill proposed for freeholding are a key part of the spectacular and dramatic landscape of the Rakaia Valley. The relative lack of obvious tracking and the absence of exotic forestry have helped maintain these high landscape values. Shelterbelt and forestry plantings would be a major visual disruption – breaking up and obscuring the glacial landforms and compromising views. They also create a potential wilding spread problem and shade out indigenous grasses and herbs.

The Conservation Resources Report (27 May 1997) recommended that three areas including the "Double Hill" landform be protected by covenants because of their outstanding landscape values. The report recommended controls or prohibition of tree planting, cultivation, tracking, and shrub clearance. These recommendations have not been implemented in the preliminary proposals. Such covenants are needed because of the inadequate or non-existent controls on forestry under the Resource Management Act (RM Act) 1991. These fails to protect the landscape values identified in the Conservation Resources Report. Freeholding without covenants prohibiting forestry is opposed.

The landscape sympathetic management of the current lessee is acknowledged and appreciated. Any future change in ownership of the Double Hill property means there is no guarantee that such management will continue. The RM Act and the Ashburton District Plan

RELEASED UNDER THE OFFICIAL INFORMATION ACT

do not provide adequate mechanisms to control forestry. The discussion of the district plan provisions in the Conservation Resources Report is incorrect given the changes that have occurred as a result of appeals to Environment Court.

Shelter belt and woodlot planting (up to 5 ha) on the lower Rakaia faces, and Double Hill fans and flats is a permitted activity provided specified wilding prone species are not used. No resource consent is required because this area is in "shelterbelt area" identified in the plan. (See Map 1 Shelterbelt areas attached). Accordingly the Council can exercise no control on woodlot or shelterbelt plantings under the RMA.

Nor does the Ashburton District Plan discourage forestry in the Rural C high country zone because forestry is only a discretionary, rather than a non-complying activity for plantings of more than 5 ha or plantings outside the "shelterbelt areas". There is no requirement that resource consent applications be notified so public views on forestry's impacts may not even be considered if forestry is contemplated.

If shelter is required for stock this could be achieved using indigenous shrub species such as matagouri which are characteristic of the area. The dark green of exotic conifers is unsympathetic to and out of place in the upper Rakaia landscape.

Double Hill landform

The Conservation Resources report said:

*"Double Hill is a highly visible and very distinctive discrete natural landform feature of the upper Rakaia valley. It is immediately adjacent to the wide braided Rakaia riverbed of international importance and outstanding natural landscape value at a regional level. It is the only landform of its kind and size in the whole of the upper Rakaia valley."*²

It said *"there should be no tree planting or around the hill."*

While some of the shrubland areas and the wetland are to be protected as conservation land, forestry on the remainder of the Double Hill landform would be a major intrusion.

Decision sought

Make the freeholding subject to a sustainable management covenant under section 97 CPLA which prohibits exotic afforestation on the Double Hill roche moutonee and in the notch in the area marked on Map 2 attached.

Rakaia flats and alluvial fans

The Conservation Resources Report recommended a covenant to retain the open grassland character of the flats and to preserve views of the Rakaia River and faces in their entirety.

It said:

"The open treeless nature of these grassy flats is crucial to public appreciation of the spectacular upper Rakaia valley, in particular views of the highly distinctive Double Hill and the glacially smoothed rectilinear lower slopes of the Palmer Range from Double Hill Run road and from the Rakaia riverbed."

"Riverflats with apparently natural cover such as these are no longer common as cultivation, tree planting and subdivision occur and those that remain as part of wider natural landscape are worthy of protection from development."

² Department of Conservation Canterbury Conservancy (27 May 1997) "Conservation resources of Double Hill pastoral lease, Canterbury" Pastoral lease tenure review report to Knight Frank Ltd. pp 18-22 at p19

*"The alluvial fans are large and well-defined natural landscape elements of the upper Rakaia valley floor, particularly the large grass-covered fan or classic form under Mt O'Connor, despite subdivision fencing and pasture improvement. All other large alluvial fans such as these in the upper Rakaia have been substantially modified by cultivation, subdivision into paddocks and shelter-belt planting."*³

Forestry and shelter belt plantings would be an obvious disruption in the landscape, gridding its expansive tawny character with lines of dark green trees. They would block views from the road and destroy the integrity of the one remaining large alluvial fan.

As the Conservation Resources report said: *"Tree planting is probably the greatest threat to the landscape values of the flats, which would totally alter the open treeless grassland character and reduce the vastness that is distinctive of the valley floor. The main threat to the alluvial fans is cultivation and tree planting, obscuring and fragmenting their natural form. Panoramic views, and views of Double Hill and the full height and length of the striking Rakaia Faces which can currently be enjoyed could be greatly reduced or completely lost."*⁴

Forestry on fans and flats could deplete streams and wetlands of water. Trees could cause a major wilding spread problem. These impacts could be avoided by a sustainable management covenant under section 97 of the Crown Pastoral Lands Act which prohibited exotic afforestation. The dense matagouri cover on the Station Creek fan also contributes substantially to landscape and conservation values and should be retained.

Decision sought

Make the freeholding subject to a sustainable management covenant under section 97 CPLA which prohibits exotic afforestation on the Rakaia fans and flats marked on Map 2 attached and protects the matagouri on the Station Creek fan from clearance.

Rakaia faces

The freeholded area of these faces from the Rakaia valley floor to the fence and proposed freehold/conservation land boundary between Donald Hill Stream and Double Hill Stream are striking in their size, regularity and form. They inspire awe and are a vivid indication of the valley's glacial history. They can be seen from the other side of the Rakaia Valley on the Algidus Road. Currently they appear relatively natural and unfragmented. Tree planting and associated tracking would disrupt this, fragment the faces and cause major visual scarring. The faces on Double Hill comprise three quarters of this landform in the Rakaia valley. They deserve protection from tree planting.

The Conservation Resources report described their outstanding landscape values thus: *"These hill faces comprising 12 km of the total 16 km length of this landform type, are considered to be the most important natural element of the ranges on the south side of the Rakaia River, despite pasture improvement and subdivisional fencing. Their huge size, and their total length (including Mt O'Connor), their uniformly and vividly glacially smoother surface, their rectilinear form, and the straight run runnels and gorge-like rock gullies incised in their surface combine to make them highly distinctive and impressive landforms, creating a very powerful visual image."*⁵ (my emphasis).

³ Ibid at p 20.

⁴ Ibid at p 20.

⁵ Ibid at p 21.

6

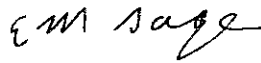
RELEASED UNDER THE OFFICIAL INFORMATION ACT

Decision sought

Make the freeholding subject to a sustainable management covenant under section 97 CPLA which prohibits exotic afforestation and tracking on the faces marked on Map 2 attached.

Thank you for the opportunity to make a submission.

Eugenie Sage
Regional field officer
For Conservation Manager



Attachments

Map 1 from "Shelter belt areas" where shelter belts and woodlots up to 5 ha (provided specified wilding prone species are not used) are a permitted activity.

Map 2 – Areas requiring sustainable management covenants.