

Crown Pastoral Land Tenure Review

Lease name: GLENTANNER

Lease number: PT 006

Public Submissions - Part 2

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

August

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10 March 2010

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The Commissioner of Crown Lands

C/- Darroch Ltd

PO Box 27

ALEXANDRA

Attention: Ken Taylor



Dear Ken

GLENTANNER PASTORAL LEASE

SUBMISSION ON PRELIMINARY PROPOSAL FOR TENURE REVIEW

Thank you for advising Environment Canterbury of the release of the Preliminary Proposal for tenure review of Glentanner Pastoral Lease. We appreciate the opportunity to review the proposal and make a submission in relation to the future management of this land.

Environment Canterbury has statutory responsibilities under the Resource Management Act 1991 (RMA) for the sustainable management of natural and physical resources of the region, including soil conservation, water quality and quantity and maintenance of biodiversity; and under the Soil Conservation and Rivers Control Act 1941 for the establishment and management of Land Improvement Agreements and Soil and Water Conservation Plans. In addition, Environment Canterbury also has statutory responsibilities under the Biosecurity Act 1993 for the management or eradication of animal and plant pests, in accordance with regional pest management strategies. These responsibilities are entirely compatible with achievement of the objectives of Tenure Review, specifically to "promote the ecologically sustainable management of High Country land" and protecting land with "significant inherent values" by retaining it in Crown ownership.

The Canterbury Regional Policy Statement 1998 (CRPS) provides an overview of the resource management issues of the region, and sets out how natural and physical resources are to be managed in an integrated way to promote sustainable management. Key to the management of soils is the maintenance or restoration of a resilient vegetative cover over non-arable land that is sufficient to prevent land degradation or the onset of erosion (Ch7 Objective 1). Sustainable management of water resources requires safeguarding the life-supporting capacity of water, including associated aquatic ecosystems and careful management of land within the headwaters and the riparian zone. Large landscapes are a feature of the Canterbury high country and the CRPS recognises the importance of protecting both the interconnectedness of landscape components and the vast, open nature of these landscapes.

Environment Canterbury has notified its Proposed Natural Resources Regional Plan (NRRP) to address the resource management issues identified in the CRPS and to provide more specific standards and methods, including rules, to achieve the objectives. The NRRP recognises the close relationship between land and water ecosystems by promoting the integrated management of soil and

Our Ref: PL5C-103; AG5T/109; IN6T/46
Your Ref:
Contact: Cathie Brumley

water resources across the region. In particular, the provisions of the plan emphasise the links between land use practices and the management of water quality.

The Canterbury Regional Pest Management Strategy (2005) [which is a revised combination of the former CRPMS (1998) and the Canterbury Regional Pest Management Strategy Biodiversity Pests (2002)] identifies a number of species of plants and animals for control or management as pest species.

Under the 2004 amendment to the Resource Management Act, regional councils have been given the responsibility to protect indigenous biodiversity (s32(1)(ga)) in association with their functions for land and water management. Recognising the important services provided by indigenous ecosystems together with the requirements for their long-term protection is inherent in providing for this responsibility.

In line with these statutory responsibilities and documents, and Section 24 of the Crown Pastoral Lands Act (1998) (CPLA), Environment Canterbury technical and planning staff have reviewed the information held by the Council on land and water resources relevant to the Glentanner pastoral lease to assess the impacts, if any, of this Preliminary Proposal on the long-term sustainable management of the land and water resources. Our comments and recommendations are listed below.

General comments

The Glentanner pastoral lease, located at the head of Lake Pukaki, provides the framing landscape for one of the most dramatic and internationally famous views in the Mackenzie Basin from SH80 to Mount Cook. This is a vast landscape, defined by its cohesiveness and uncluttered naturalness allowing Mt Cook to dominate as the visual focal point. The geology of the landscape is very visible and displays the history of tectonic and glacial development of the area. Currently, with no distinctive visible break in the landscape between the pastoral lease and the adjacent Mount Cook National Park, the lease makes an important contribution to the high natural values of this area.

Extending along the flanks of the Ben Ohau Range, the lease includes the lower portions of several key tributaries of the Tasman River and the upper Lake Pukaki, both renowned for the clarity and quality of their water. Lake Pukaki, like most high country lakes, forms the sink for any nutrients or sediment moving downslope off the surrounding ranges. Currently the quality of water in the lake is very high with an inherently low nutrient status that provides unique aquatic habitat for many species of indigenous alpine flora and fauna. The ecological values of these water bodies are significant. Any increase in nutrients or sediment entering the lake, therefore, has the potential to degrade this quality dramatically, and consequently the quality of water bodies downstream of the lake.

Tenure review is considered to be the key tool to provide for the long-term protection and management of these values. Any change to land status through tenure review that enables greater intensification of land use to occur should be cognisant of the potential consequences of such a change on the ecology and landscape of this environment and for the quality of the soil and water resources, and should include appropriate and practical measures to ensure the long-term ecologically sustainable management and protection of those values.

Based on the resource information and technical knowledge held by Environment Canterbury, the following sections provide a more detailed discussion of the key issues for resource use and protection, and the extent to which the Preliminary Proposal has provided for the integrated and long-term, ecologically sustainable management of land and water resources of the Glentanner lease and the protection of the significant inherent values identified for the land.

Soil Conservation

The slopes leading from the Ben Ohau Range are dissected by a number of steeply incised streams which flow down to the Tasman River or into Lake Pukaki. The lower flanks of these slopes, contained within the current boundaries of the Glentanner pastoral lease, are composed predominantly of Class VI and Class VII land. The Class VII land in particular has severe soil erosion risk with significant limitations for pastoral use.

The attached Plans 1 (a)–(c) show the land use capability ratings for the pastoral lease area.

The following discussion of issues relating to the management of soil conservation values has been based on soil and vegetation information sourced from Land Use Capability (LUC) mapping and the former Waitaki Catchment Commission property maps prepared for the Soil and Water Conservation Plan programmes undertaken as part of the Land Improvement Agreements (LIAs) applying to this lease. Achieving the objective for the "ecologically sustainable management" of the land will rely on the protection of the quality and quantity of soils on this lease. The quality of soils will determine their ability to support a healthy vegetation cover and to prevent the onset of erosion which could lead to a permanent loss of soil fertility, together with the risk of sedimentation of water bodies.

Land Improvement Agreements (LIAs)

The Glentanner lease is subject to two fixed-term Land Improvement Agreements that recognise the inherent limitations of parts of the lease for sustained production and the need to reduce the risk of erosion and sediment generation from inappropriate land use. The terms of these agreements will continue to apply to any land freeholded through tenure review up to their date of expiry. Any proposed change in land status from Crown lease to freehold through the tenure review process therefore should consider any implications of intensifying land use in terms of the inherent limitations of the land and the conditions that will apply to freeholded land.

Under LIA No. 439190/1, a **Soil and Water Conservation Plan** was developed over the whole of the Glentanner lease which successively put in place grazing limits over areas of land with inherent limitations for pastoral use and introduced, by way of subsidies, a number of improvements in management through fencing and over sowing and topdressing (OSTD) to restore and maintain a more intact vegetation cover over land most at risk of erosion. The area CA2 was originally retired and surrendered from the pastoral lease as part of this LIA agreement. A POL was subsequently issued over this land for a five-year transition period to allow the runholder to develop off-site grazing capability to compensate for lost grazing in CA2. The POL expired 20 years ago. The LIA has a 33 year term and expires in June 2016.

The LIA imposes grazing limits over parts of the land proposed to be freeholded, including:

- The southern portion of the CC1 land;
- The upper part of the FH1 block; and
- The western portion of CC3.

In addition the area CC2, as part of the original retired and surrendered land, is subject to a prohibition on grazing for the term of the LIA.

The areas subject to grazing restrictions are shown as superimposed over the Preliminary Proposal designations on the attached Map 1.

A Rabbit and Land Management Programme LIA No. A3657/1 was established over the Katherine Field Block at the lower end of Lake Pukaki to manage the high rabbit numbers existing at the time. This LIA has a 20 year term and expires in April of this year (2010).

The attached Plans 2(a)-(c) show the series of works programmes undertaken for the two LIAs

Under the current management of the Glentanner lease, the works undertaken for the LIAs have been well maintained and the stock limitations have enabled the restoration and maintenance of an improved vegetation cover over areas of eroding or bare land.

However, regardless of the current management it is imperative for tenure review to recognise the inherent capability and limitations of the land and apply appropriate designations that can provide for the sustainable management of the land and its values.

Preliminary Proposal designations

CA1

Environment Canterbury supports the proposal to restore these steep faces to Crown ownership and control as they are predominantly Class VII, highly erodible land with severe limitations for any land uses. Retaining a resilient vegetation cover should be the primary focus for protecting the soil from erosion and maintaining the natural values of the area.

Fencing installed under the S&WCP should be used as the boundary where appropriate.

CA 2

Environment Canterbury supports the decision to retain this area under Crown ownership and control. Originally retired and surrendered from the pastoral lease due to the severe nature of limitations for pastoral use and vulnerability to erosion, it is 20 years since the expiry of the transitional POL licence and the focus for future management of the land should be soil conservation and long-term protection of the outstanding natural values of the environment.

SR areas

These areas along the margin of the Tasman River are inherently dynamic in terms of their interaction with the braided riverbed. They also act as a buffer between the land and water and provide important filtering of nutrients or sediment moving over the land. Environment Canterbury supports the restoration of these areas to Crown ownership and control to enable the sustainable management of these lands and the adjacent water bodies.

CC1, CC3, FH1

Under the terms of the Land Improvement Agreement (LIA 439190.1) various parts of these freeholded areas will retain grazing limitations that recognise the land use capability limitations of the land and the need to retain a healthy vegetation cover. These are shown as hatched areas over the Preliminary Proposal designations in attached Map 1. While the LIA will expire in 2016, the inherent capability of the land will not change and Environment Canterbury would like to see this reflected in the conditions attached to the Conservation Covenants. Currently there is no provision in the Conservation Covenants for the sustainable management of the soil and water resources through the setting of conditions for grazing type or intensity or requirement to sustain a healthy and intact vegetation cover over the land. Environment Canterbury recommends that soil and water values are added to the list of "Values to be Protected" in Schedule 1 to recognise the importance of protecting the long-term land capability and the high water quality of the streams traversing the land.

In terms of land capability and needs for long-term ecologically sustainable management of the land there is no reason to treat the FH1 area any differently from CC1 and CC3. There are areas of Class VII land throughout all of the freeholded blocks, which require careful management to retain a good vegetation cover. Environment Canterbury would support the creation of a conservation covenant over all land to be freeholded under this tenure review to recognise the importance of the values of the area and the need to manage the land carefully. It is recommended that specific conditions to protect the soil and water values, based on the capability of the land and the maintenance of an intact (at least 80%) vegetation cover, are included within the Schedule 2 conditions of each of the covenants.

Environment Canterbury stresses the need to include a comprehensive monitoring programme for these Conservation covenants as part of the Covenant conditions. These should require three to five yearly reviews of the monitoring to be able to assess the impacts of the land use activities on the environment and the values listed in Schedule 1, and to enable timely management changes to be implemented to avoid any long-term adverse effects.

CC2

This area of land was originally part of the pastoral lease area that was retired from grazing due to the severe limitations of the land for land disturbance activities. This land also has highly significant inherent values in terms of the natural values and wider landscape values that are dependent on careful management of the soil resource.

While it has now been proposed for freehold, Environment Canterbury is pleased to see that the conservation covenant placed over the area continues to disallow grazing. This will provide for the protection of the vegetation cover which will be beneficial both for soil conservation purposes and for biodiversity values. Allowing for continued cultivation in Clause 3 seems curiously inconsistent with the other conditions and with the proposed use for the land and it is recommended that this is removed primarily on soil conservation grounds to recognise the high erosion risk and limited capability of the land.

Recommendations:

Environment Canterbury supports the protection given to areas CA1, CA2 and SR on the basis of their important inherent natural values and the application of conservation covenants CC1 and CC3 over areas proposed to be freeholded.

In addition to this support, and to provide for the long-term ecologically sustainable management of the land, Environment Canterbury makes the following recommendations for changes to the Preliminary Proposal:

- 1. That a Conservation Covenant is applied to the area designated FH1 to provide the same level of protection of the inherent values as areas CC1, and CC3 and CC4.*
- 2. That a monitoring programme is a requirement of the Covenants, is set out in detail within the Covenant document and is reviewed on a regular basis to ensure that any adverse effects on the values to be protected are identified early enough to prevent long-term or irreversible damage.*
- 3. That the soil resources, including their quality and quantity are included as "Values to be protected" (as listed in Schedule 1) for the Conservation covenants CC1-CC4 to recognise their importance to the overall ecological sustainability of the environment.*
- 4. That Schedule 2, Condition 3 of the conservation covenant over CC2, allowing for cultivation of any areas, be deleted. This is recommended to be consistent with the limited land use capability and high erosion risk applying to land in this area.*

Indigenous vegetation, fauna and wetlands values

Tenure review provides a valuable opportunity to help achieve two key objectives of the Reserves Act 1977 and the New Zealand Biodiversity Strategy (2001). These are, respectively, "preservation of representative samples of all classes of natural ecosystems and landscapes" and to "maintain and restore a full range of remaining natural habitats and ecosystems to a healthy functioning state." A complimentary objective of the tenure review process is to ensure that conservation outcomes are consistent with the New Zealand Biodiversity Strategy.

Indigenous vegetation

Examples of 11 Level IV Land Environments are present on Glentanner Pastoral Lease (Leathwick et al. 2003)¹:

¹ Leathwick J.R., Wilson G., Rutledge D., Wardle P., Morgan F., Johnston K., McLeod M., Kirkpatrick R. 2003. *Land Environments of New Zealand*. David Bateman, Auckland, New Zealand

- T1.1a – Permanent snow and ice
- R1.1a, R1.1c, R1.2a – Southern Alps
- P1.2c, P1.2d – Mountains east of the Southern Alps
- E1.4c – Steep foothills
- E4.2a – Rolling foothills
- K1.1a, K1.1b – Recent well-drained soils, undulating floodplain
- K4.1b – Recent poorly-drained soils, undulating inland basin

These 11 Land Environments are listed, in approximate altitudinal sequence (highest to lowest) as they occur on Glentanner PL, in the table below. The table also shows the percentage of indigenous vegetation remaining in each land environment nationally, and the proportion of each environment that is already protected in existing reserves or conservation covenants. Threat categories are assigned on the basis of these figures (from Walker et al. 2007)².

Lvl IV Land Environment	% Indigenous Cover Remaining	% Protected	Threat category	Comment
T1.1a	99.95	97.31	>30% left, > 20% protected	Comparatively secure from clearance
R1.2a	100	99.32	>30% left, > 20% protected	Comparatively secure from clearance
R1.1c	100	69.67	>30% left, > 20% protected	Comparatively secure from clearance
R1.1a	99.47	79.68	>30% left, > 20% protected	Comparatively secure from clearance
P1.2c	99.95	59.05	>30% left, > 20% protected	Comparatively secure from clearance
P1.2d	94.09	47.55	>30% left, > 20% protected	Comparatively secure from clearance
E1.4c	59.9	28.6	>30% left, > 20% protected	Comparatively secure from clearance
E4.2a	64.5	27.8	>30% left, > 20% protected	Comparatively secure from clearance
K1.1a	46.1	54.2	>30% left, > 20% protected	Comparatively secure from clearance
K1.1b	27.8	9.6	20-30% indigenous cover left	At Risk
K4.1b	35.8	1.8	<30% left and <10% protected	Critically Underprotected

Only two land environments on Glentanner PL, recent soils environments K1.1b and K4.1b, are categorised as 'threatened'. Most of 'Critically underprotected' land environment K4.1b present on

² Walker S., Cieraad E., Grove P., Lloyd K., Myers S., Park T., Porteous T. 2007. *Guide for Users of the Threatened Environments Classification*. Landcare Research. 35 pp.

Glentanner PL, which includes the poorly drained soils with their characteristic lagoons and wetlands, lies within the proposed scenic reserve along the margins of the Tasman River. This will provide some important long-term protection for this environment and is supported by Environment Canterbury as contributing to the national priorities for biodiversity protection.

Examples of 'At Risk' land environment K1.1b, which is characterised by the better drained floodplain habitats, occur predominantly within the proposed freeholded areas FH1 and FH2 which have been extensively developed as part of the tourism ventures, including the airfield, motor camp and Glentanner homestead areas. The Conservation Resources Report (CRR) did not identify significant ecological values remaining within these areas.

Small remaining examples of "At risk" environment K1.1b are proposed for various types of protection: scenic reserve, conservation area CA1, and freehold conservation covenant CC3.

The proposed covenant conditions for CC1, CC3 and CC4 all permit continued stock grazing, new fencing, pasture development and clearance of indigenous matagouri, manuka and bracken vegetation by herbicide or fire. These conditions provide no real protection for biodiversity values within their areas and should be seen as only capable of protecting the overall open, "semi-natural" landscape features of the area. The Conservation Resources Report identifies some important ecological values within the proposed freeholded areas CC1 and CC3 and it is recommended that the conditions for the covenants recognise and provide for the long-term protection of these values.

Recommendations

Environment Canterbury recommends that the terms of the Conservation covenants for areas CC1 and CC3 are amended to recognise and provide long-term sustainable protection for the ecological values identified in the DoC Conservation Resources Report as being present in these areas.

Water quality and aquatic ecosystems

The Glentanner lease occupies an important position with respect to the protection of the water quality and hydrology of the Tasman River as it flows into Lake Pukaki. As a braided river system, it is a dynamic and highly mobile system naturally constrained by the glacial terraces that define the bed area.

The Tasman River and Lake Pukaki are inherently oligotrophic water bodies characterised by extremely low nutrient levels which support important and distinctive associated ecosystems. These values have been recognised nationally and internationally and are well described in the Conservation Resources Report.

Restoring the berm land bordering the Tasman riverbed to Crown ownership and control is fully supported by Environment Canterbury as crucial to protect the important riparian zone of land-water interactions for the Tasman River. This is a very dynamic and fragile environment which provides the natural buffer between the active river channels and the surrounding land. From a hydrological and ecological point of view, it is considered unwise to allow any activities that could result in constraining the river bed area or the natural dynamics of the river system. Contained within the reserve land are wetlands and outwash fans that are part of the functioning river system and which are of significant importance as wildlife habitat and wetland ecosystems. Placing scenic reserve status on these lands recognises the special importance of the area for its flora and fauna values and will contribute to the uninterrupted visual appreciation of this spectacular environment by travellers along SH80.

Environment Canterbury supports the addition of CA1 to the land proposed to be restored to Crown ownership as this will contribute to providing important water quality protection for the entire length of Whale Stream and its riparian zone as it passes through the Glentanner lease.

The rest of the area CA2 set aside in the Preliminary Proposal for Crown ownership or control covers only the upper portions of the remaining tributary catchments flowing from the Ben Ohau Range through the Glentanner lease to the Tasman River. On its own this may be insufficient to provide

effective protection of these water ways from the effects of future land use intensification, or activities such as the construction of new tracks that can lead to contamination or sedimentation of the water bodies.

Tributary creeks or small rivers, because of their size and limited assimilative capacity, are particularly susceptible to degradation from agricultural activities such as grazing, and tracking. Grazing of riparian margins, for example, reduces vegetation stature and trampling of soils and banks results in an increase in sedimentation. One of the most effective ways of maintaining water quality is to restrict stock access to water ways, avoid disturbance of the soil adjacent to water ways, and to maintain well vegetated riparian margins to trap pollutants in runoff from adjacent land. Where riparian margins retain areas of indigenous vegetation, it is recommended that the Preliminary Proposal provides for these areas to be adequately protected from disturbance by stock or development.

Environment Canterbury particularly supports the extension of the CA2 area to include the full length of the main tributary streams flowing through the lease land (Twin, Bush and Fred in particular). It is unclear from the Preliminary Proposal whether these parts of CA2 include protection for the riparian zone, but it is recommended that the boundaries of the CA2 area are inclusive of these areas. Once the property becomes alienated from Crown ownership it becomes very difficult to manage land uses to minimise adverse effects on water waterways, or to ensure public access to the conservation estate or waterways. The tenure review process offers an opportunity to set aside adequate riparian margins to protect existing water ways and their aquatic ecosystems.

Recommendations:

1. *Environment Canterbury supports the proposal to restore berm land adjacent to the Tasman River to full Crown ownership and control to recognise and provide for protection of its important hydrological and ecological values.*
2. *To recognise and provide for the long-term protection of water quality for the Tasman River and Lake Pukaki by adequately protecting the key tributaries flowing into them, Environment Canterbury recommends that:*
 - a) *The conservation area CA2 is amended where necessary to be inclusive of the riparian margins of Twin, Bush and Fred Streams where it extends along these water bodies to the Tasman River.*
 - b) *That protection of water quality and the water ecosystems are included in the list of "Values to be protected" in Schedule 1 of the conservation covenants.*

Overall Recommendations

Environment Canterbury considers that the Preliminary Proposal for Glentanner pastoral lease has recognised the significant inherent values of the land as contributing to the internationally important landscape of the Mt Cook region. However the report lacks recognition of the specific management issues for soil and water conservation that are pivotal to maintaining the overall values of the area. Specifically Environment Canterbury requests the following changes to the Proposal:

Soil conservation

1. That a Conservation Covenant is applied to the area designated FH1 to provide the same level of protection of the inherent values as areas CC1, and CC3 and CC4.
2. That a monitoring programme is a requirement of the Covenants, is set out in detail within the Covenant document and is reviewed on a regular basis to ensure that any adverse effects on the values to be protected are identified early enough to prevent long-term or irreversible damage.

3. That the soil resources, including their quality and quantity are included as "Values to be protected" (as listed in Schedule 1) for the Conservation covenants CC1-CC4 to recognise their importance to the overall ecological sustainability of the environment.
4. That Schedule 2, Condition 3 of the conservation covenant over CC2, allowing for cultivation of any areas, be deleted. This is recommended to be consistent with the limited land use capability and high erosion risk applying to land in this area.

Indigenous biodiversity

That the terms of the Conservation covenants for areas CC1 and CC3 are amended to recognise and provide long-term sustainable protection for the ecological values identified in the DoC Conservation Resources Report as being present in these areas.

Water quality and aquatic ecosystems

1. That the conservation area CA2 is amended where necessary to be inclusive of the riparian margins of Twin, Bush and Fred Streams where it extends along these water bodies to the Tasman River
2. That protection of water quality and the river and lake ecosystems are included in the list of "Values to be protected" in Schedule 1 of the conservation covenants.

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

Yours sincerely



Don Rule

DIRECTOR RESOURCE PLANNING AND CONSENTS

Attachments:

Plans 1(a)-(c): Land use capability for land in the Glentanner lease

Plans 2(a)-(c): Soil & Water Conservation Plans for Glentanner Station showing works undertaken

Map 1: Areas subject to grazing limitations under Land Improvement Agreement No. 439190/1

Map 2: Land environments distribution within the Glentanner lease.

**TR024 Glentanner
Preliminary Proposal
Sheet 1 of 3**

Land to be retained in full Crown ownership and control CA1 by way of exchange for FH 4 (depicted on Sheet 2)

Land to be retained in Crown control as a Conservation Area subject to a concession CA2

Land to be retained in Crown control as a scenic reserve subject to a concession "SR"

Land to be freeholded to Glentanner Station Limited "FH1" and "FH2"

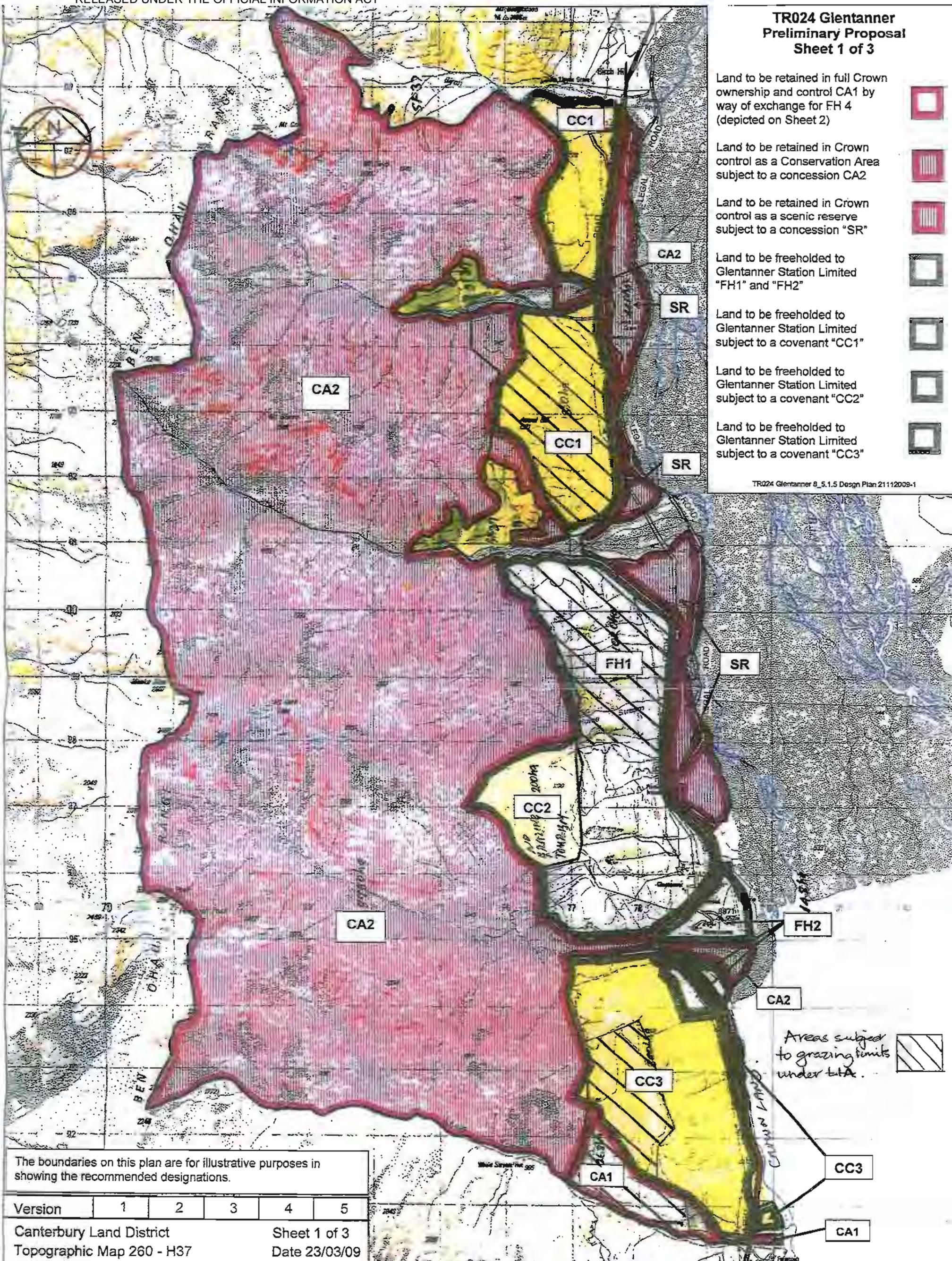
Land to be freeholded to Glentanner Station Limited subject to a covenant "CC1"

Land to be freeholded to Glentanner Station Limited subject to a covenant "CC2"

Land to be freeholded to Glentanner Station Limited subject to a covenant "CC3"



TR024 Glentanner 8_5.1.5 Design Plan 21112009-1



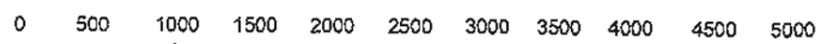
The boundaries on this plan are for illustrative purposes in showing the recommended designations.

Version	1	2	3	4	5
Canterbury Land District					Sheet 1 of 3
Topographic Map 260 - H37					Date 23/03/09

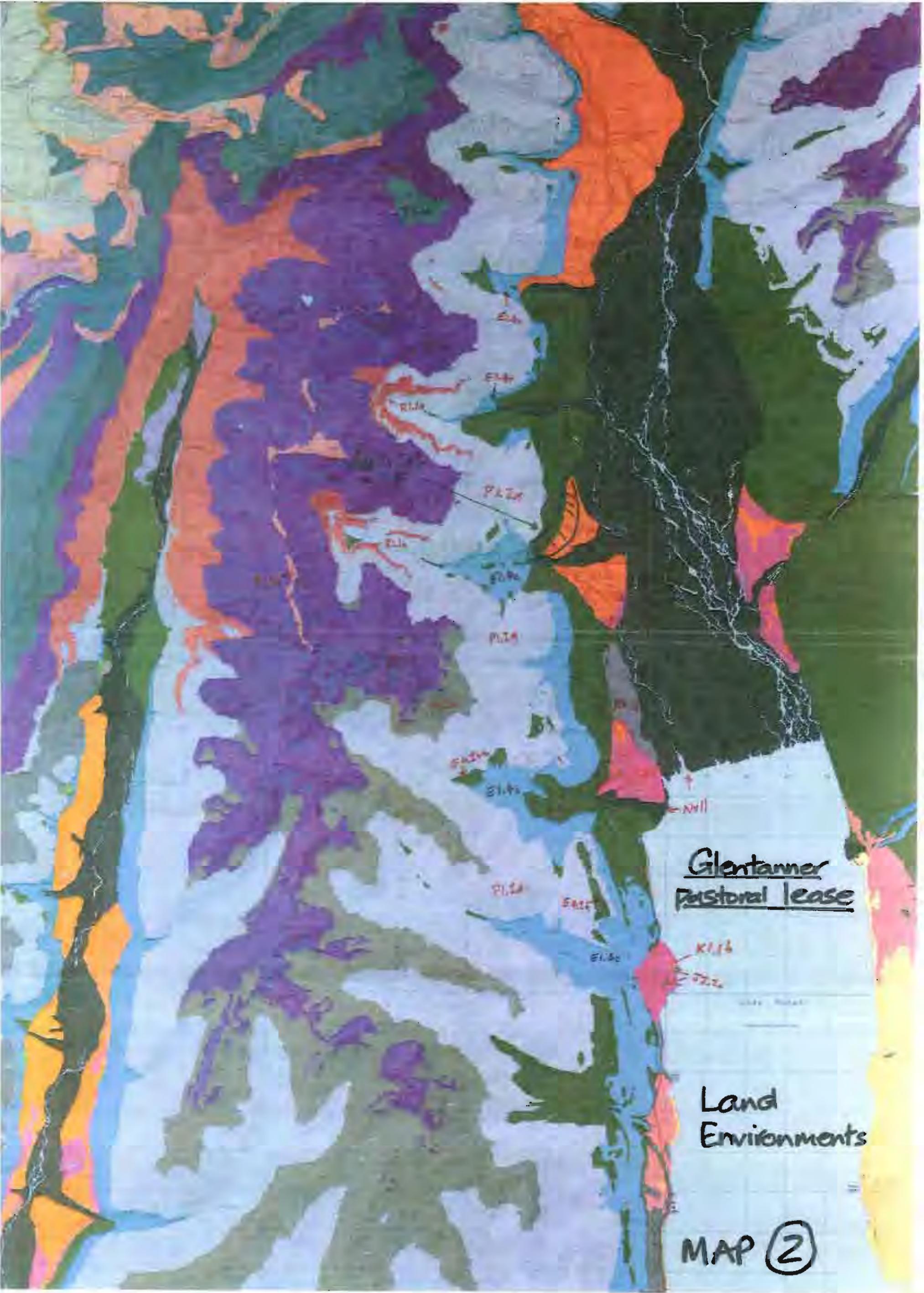
Areas subject to grazing limits under t.A.

Glentanner

Scale 1:50000



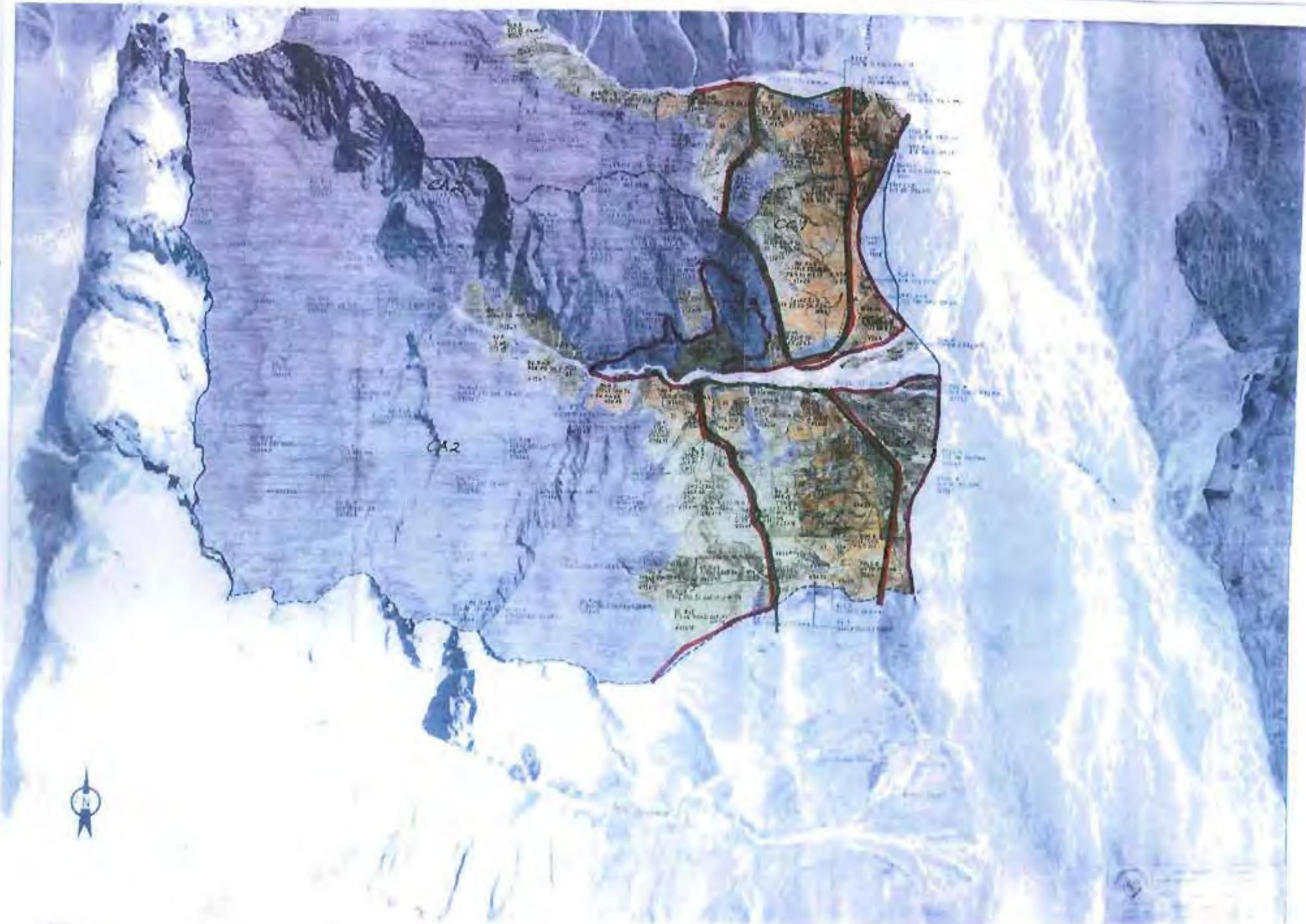
MAP ①



Gilentanner
Pastoral lease

Land
Environments

MAP (2)



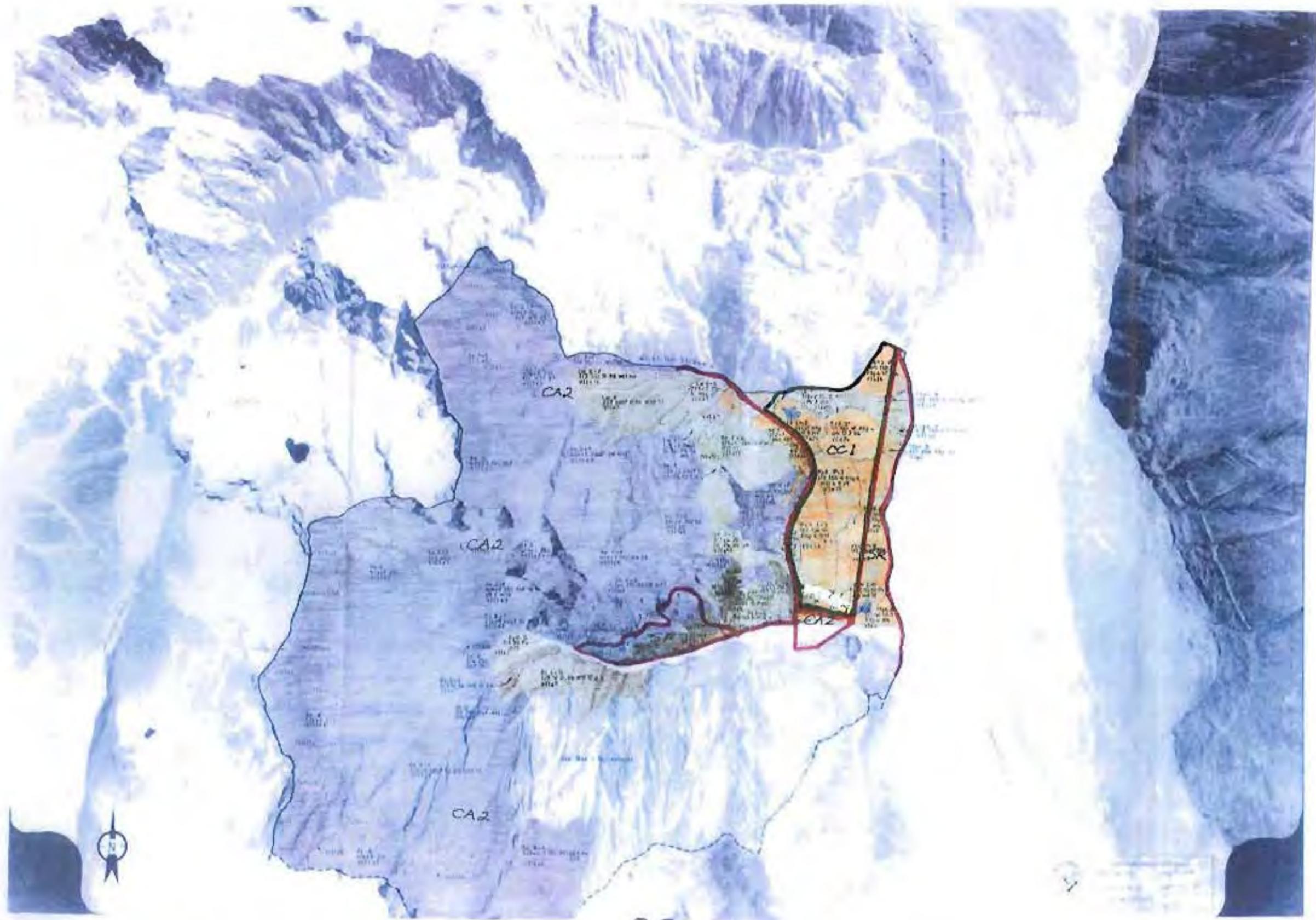
Water
 California Division of
 Biological Resources

STENANNIS

Land Use Plan
 Land Use Inventory

Plan 1(b)

- 1. 100' contour
- 2. 200' contour
- 3. 300' contour
- 4. 400' contour
- 5. 500' contour
- 6. 600' contour
- 7. 700' contour
- 8. 800' contour
- 9. 900' contour
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- 92. 9200' contour
- 93. 9300' contour
- 94. 9400' contour
- 95. 9500' contour
- 96. 9600' contour
- 97. 9700' contour
- 98. 9800' contour
- 99. 9900' contour
- 100. 10000' contour



- 1. 100% Agricultural
- 2. 100% Forest
- 3. 100% Pasture
- 4. 100% Urban
- 5. 100% Industrial
- 6. 100% Residential
- 7. 100% Commercial
- 8. 100% Public
- 9. 100% Private
- 10. 100% Other
- 11. 100% Unknown
- 12. 100% Vacant
- 13. 100% Water
- 14. 100% Wetland
- 15. 100% Wetland
- 16. 100% Wetland
- 17. 100% Wetland
- 18. 100% Wetland
- 19. 100% Wetland
- 20. 100% Wetland

GLENTANNER

Land Inventory
Land Use Capability

Plan 1 (c)

1:10,000	1:10,000
1:10,000	1:10,000



- SINGLE PRACTICE WORKS
- FIRST 3 YEAR S.F.N.C.P.
- SECOND 5 YEAR S.F.N.C.P.

- SOIL CONSERVATION FENCING
- INTERNAL CATTLEPROOF FENCING
- T RETIREMENT FENCING
- STRATEGIC FIREBREAK ACCESS TRACK
- GRAZING RESTRICTIONS

Water
Catchment Board and
Regional Water Board

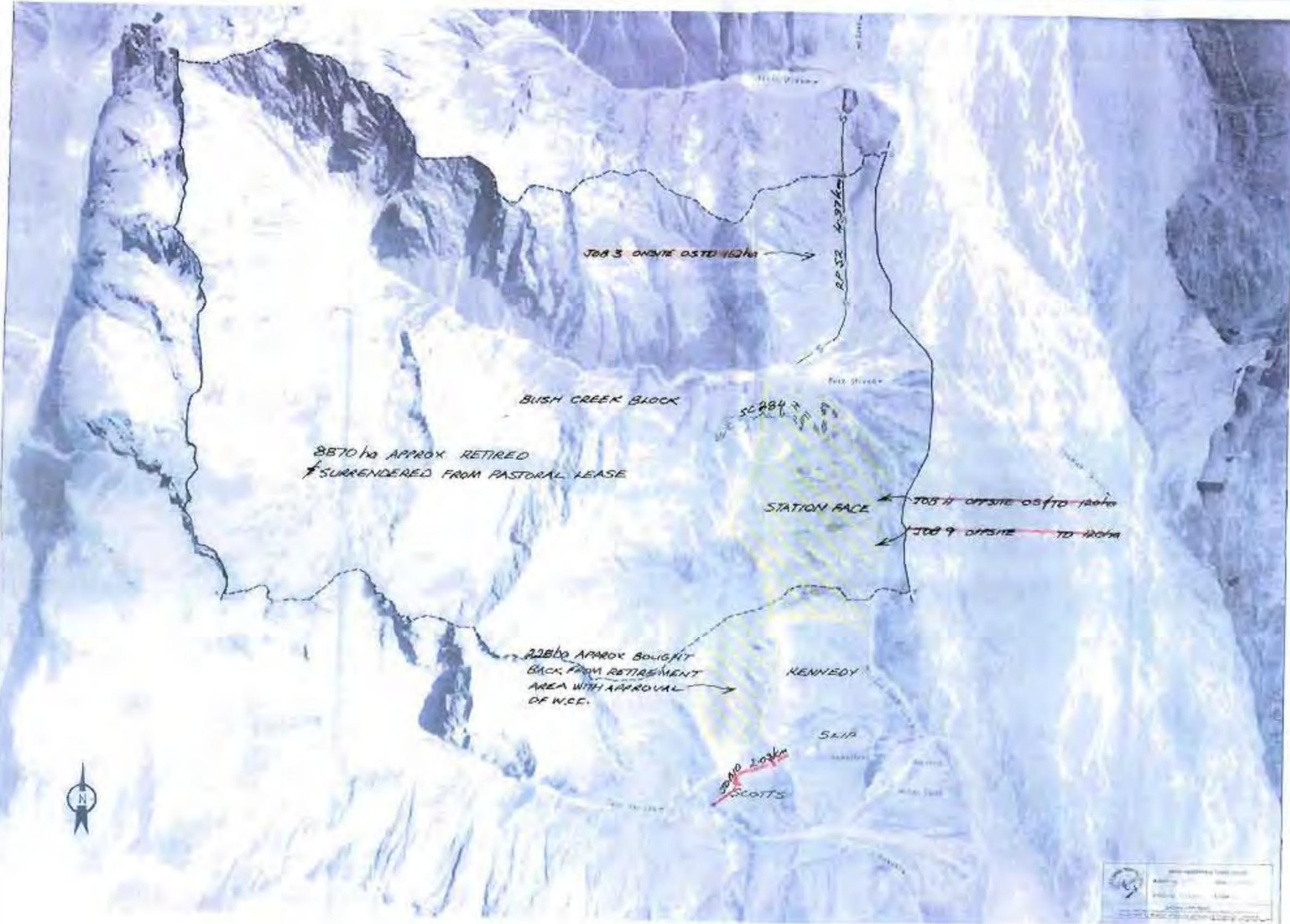
Scale 1:25,000
Datum: A.D. 1950

Map of the Glentanner
Area, 1964

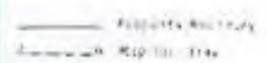
GLENTANNER
I.R. LVEY

Plan 2(a)

1:25,000




 Waitaki
 Catchment Board and
 Regional Water Board


 Property Boundary
 Riparian Area

MAP SHEET: 100000
 SCALE: 1:25,000
 DATE: 1974

GLENTANNER
 I.R. IVET

Plan 2 (b)

1:25,000

30 50 100 150



Waikato
Catchment Board and
Regional Water Board

Scale 1:50,000
Map of 1980

Scale 1:50,000
Map of 1980
Map of 1980
Map of 1980

GLENTANNER
1:50,000

Plan 2 (c)

13

DTZ ALEXANDRA
12 MAR 2010
RECEIVED

Braemar Station
C/o 397 Pages Rd
RD 4
Timaru
24th Feb. 2010

The Commissioner of Crown Lands
C/o Darroch Ltd.
43 Tarbet St
Alexandra.

Dear Sir,

Subject. Glentanner Preliminary Proposal

I wish to submit on the Glentanner Tenure Review proposal. Glentanner is an iconic area and the proposal must be viewed in context with its proximity to the Mt Cook National Park.

* Farming . By surrendering the river flats (SR), which are low cost to run, the "balance" of the property will be severely affected. It will be essential that FH1 has no covenants or restrictions which will impede good farming practices.

* Tourism. As Glentanner already has a significant tourist infrastructure on the Twins delta, planning for any future development must be given careful thought. The area (FH2) to the immediate South of The Twins stream is a safe area, with unsurpassed views towards the National Park and must be freeholded to Glentanner with no covenants or restrictions.

To enable people to enjoy a real high country experience the area marked CC2 must be included in the area to be freeholded to Glentanner as this will be as near to the National Park as one can get to participate in these activities.

Tourism will be an important part of Glentanner and takes the pressure away from the National Park

* CC1. This area should be returned to Glentanner with as few restrictions as possible as it provides an excellent buffer between the developed farm land and the National Park.

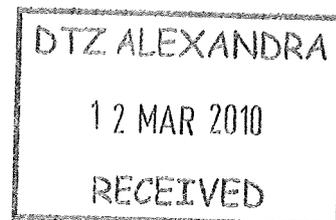
* CC3. It is appropriate that the bulk of the land in CC3 has a protection covenant on it to protect it from inappropriate development, however, I wish to refer to the land East of the highway and adjoining Whale Stream known as The Rest Paddock. This area is very much modified, has been built on in the past, and adjoins the already much developed Ferintosh homestead buildings.

It should be given the same status as FH2

I support the plan and commend the Ivey's on their generosity in surrendering a large area of very valuable land between the highway and the Tasman River.

Yours sincerely
Duncan Mackenzie





Darroch Limited

Box 27

Alexandra 9340

New Zealand

8th March 2010

Roger James

427 New North Road

Kingsland

Auckland 1021

Ph 021968203

Submission: Glentanner Tenure Review Under the Crown Pastoral Land Act 1998

Background:

Originally born in the Mackenzie country I now reside in Auckland and have done for over 20 years. I am an enthusiastic hunter and own a property development company.

Most years I holiday in the South Island and frequently visit the Mackenzie country often travelling up SH8 to Mt Cook.

I have observed over the past few years that most of the land South of Wales Stream has deteriorated, becoming over grown with wilding pines and losing its sub alpine beauty.

I have also observed, the land North of Wales stream, the landscape has changed very little, obviously being well managed allowing stock and the natural habitat to work in unison and maintain the sub alpine beauty.

On seeing the Glentanner Tenure review advertised in the Christchurch Press last year while holidaying in the area I requested a copy of the document.

Having studied the document in detail I have decided to put in a submission in support of the Glentanner Tenure Review.

I have observed:

- Over the last 20 years that the land belonging to Glentanner Station has been well managed and looked after by its tenants, the Ivey family.
- The tourist operations run by Glentanner Station and the Ivey family appear to be well managed and must bring considerable revenue to both the Mackenzie District and New Zealand.

I have however, some concerns that the Glentanner tenure review document in my opinion, may be somewhat weighted in favour of the crown.

1. The land that is being taken out of the Glentanner lease and given into crown ownership may not be well maintained as I understand this has been the case with some other properties that have undergone tenure review. This crown land may become over run with wilding pines, rabbits and other pests such as geese which will migrate onto the farmers land making it uneconomical to farm. An

undertaking needs to be made by the Crown in the Glentanner tenure review document to ensure that this does not occur. This would be pertinent to the SR land

2. CC1 This designated land has significant landscape value that requires protection as it acts as a buffer between Glentanner and the Mount Cook National Park. It is important that Glentanner gains freehold title to this area so it can continue to be farmed in the manner it has been over the past 150 years. This is a high rainfall area and is important for the ongoing grazing security of the whole property.

3. CC2 I have walked over the land designated as CC2 a number of times, and in spite of existing stock grazing, the natural habitat has been maintained in keeping with the area.

I am aware that the conservation covenant disallows the grazing of stock in this area and the freeholding of this land is essential for the ongoing success of the Glentanner tourism business.

4. CC3 The land designated as CC3 is a lakeside landscape. I support the conservation covenant to ensure that this area remains as farm landscape while enabling Glentanner to maintain an income from the land through traditional farming methods and protecting the land from inappropriate development.

5. FH1 I fully support Glentanner getting unencumbered freehold title to this land as it is the nucleus of the farming property, with all the essential requirements to run an economic farming unit, including housing, buildings, holding paddocks, deer paddocks, stock yards, cultivated paddocks etc. The property needs to have the opportunity to develop this land as required in the future for effective and profitable farming.

6. FH2 The land designated as FH2, is the land designated for tourism in the Mackenzie district plan. This designation has been in existence for a number of years and in my opinion is essential for potential tourism in the Mackenzie basin. Not only is this important for the significance of Mount Cook as a national tourist attraction, It is also complimentary as an area of development outside the Mount Cook National Park.

The FH2 sites south of the Twin Streams are essential to allow future high quality development on high ground that is not subject to flooding. It would also be unrealistic for high quality tourism ventures to be constructed if this land was not designated as freehold.

7. FH3 is land that is highly modified land of low natural value. It is entirely appropriate that this land should be designated as unencumbered freehold to Glentanner.

8. FH4. It would appear that the crown is getting a really good deal with Glentanner giving up CA1, the significant shrub land on Wales Stream plus the existing holding paddock on the eastern side of the road south of Wales stream.

I understand the owner has held off from improving this land. I would presume that some adjustment will be made in favour of Glentanner for this exchange of land.

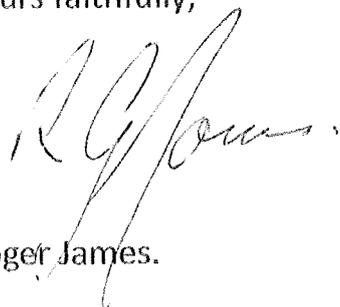
9. CC4 I understand this land has only been gazetted to Glentanner for a short period of time. It is important that this land be held by Glentanner as it is an essential holding paddock for stock movements between Catherine Fields and Glentanner. The conservation covenant protects this land from any inappropriate future development should the public or the crown have any concerns.

In Summary;

It would be unreasonable for the crown to have a covenant over the whole property which would penalise Glentanner for the excellent land management and farming that has taken place on the property over the last 150 years. This property has maintained its scenic value because of good farming practices.

If the Glentanner tenure review process is well managed by the crown ensuring Glentanner can be viable economically and maintain its high standard in both farming and tourism practices, I feel this will be very beneficial to all New Zealanders.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R. James', written in a cursive style.

Roger James.