

## **Crown Pastoral Land Tenure Review**

**Lease name: MT ALFORD**

**Lease number: PC 052**

### **Final Report on Public Submissions**

This document builds on the Preliminary Report on public submissions. The analysis determines if an issue that was allowed, and further consulted on, is accepted or not accepted for inclusion in the Substantive Proposal and to what extent. The report complies with the requirements of Section 45 Crown Pastoral Land Act 1998.

The report attached is released under the Official Information Act 1982.

**August**

**05**

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**Report in Accordance with Contract 50346**

**Final Analysis of Public Submissions for Preliminary Proposal**

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File Ref: CON/50000/16/12757/00/A-ZNO-05 Submission No: QVV 650 Submission Date: 4/5/2005

Office of Agent: Christchurch

LINZ Case No:

Date sent to LINZ: 5/5/2005

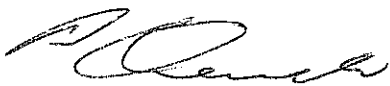
*TR05/105*

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**RECOMMENDATIONS**

- (1) That the Commissioner of Crown Lands approves this report for tenure review of Pc 052 Mt Alford Pastoral Lease.

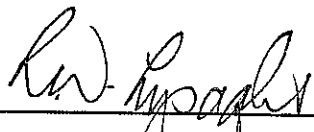
**Signed by Contractor:**



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Barry Dench  
Team Leader for Tenure Review

**Approved/Declined by:**



Name:

Date of decision: *12/5/05*

**(1) Details of lease:**

**Lease Name:** Mt Alford  
**Location:** Spoors Road and Alford Forest Settlement  
Road, Alford Forest, Mid Canterbury  
**Lessee:** Mt Alford Station Limited

**(2) Public notice of preliminary proposal:**

***Date, publication and location advertised:***

1 May 2004

- The Press Christchurch
- Otago Daily Times Dunedin

***Closing date for submissions:***

25 June 2004

**(3) Details of submissions received:**

A total of six submissions were received, including two late submissions.

**(4) Analysis of submission:**

***4.1 Introduction:***

***Explanation of Analysis:***

This is a final analysis of submissions. The purpose of this final analysis is to determine whether to accept or not accept the points raised in submissions for inclusion in the substantive proposal.

Each of the submissions received has been reviewed in order to identify the points raised and these have been numbered accordingly. Where submitters have made similar points, these have been given the same number.

The following analysis:

- Summarises each of the points raised along with the submission number of those submitters making that point.

- Provides a discussion of the point.
- Records the CCL decision whether or not to allow/not allow the point for further consultation.
- Records the CCL decision whether to accept the point for inclusion in the proposal.

The following approach has been adopted when making the decision:

(i) To allow / not allow for further consultation:

The decision to “**Allow**” the point made by submitters is on the basis that the matter raised is a matter than can be dealt with under the Crown Pastoral Land Act 1998. Conversely, where the matter raised is not a matter that can be dealt with under the Crown Pastoral Land Act, the decision is to “**Not Allow**”. Those points that are ‘allowed’ will be given further consideration with respect to the proposal.

It should be noted that points relating to the Conservation Act, or any other statutory authority outside of the Crown Pastoral Land Act 1998 are not able to be considered by the Commissioner of Crown Lands.

(ii) To accept/ not accept:

The outcome of an “**Accept**” decision will be that the point is included in the draft Substantive Proposal. To arrive at this decision the point must be evaluated with respect to the following criteria:

- The objectives and matters to be taken into account in the Crown Pastoral Land Act (sections 24 & 25) and;
- The views of all parties consulted and any other matters relevant to the review, balanced against the objectives and matters to be taken into account in the Crown Pastoral Land Act 1998.

**4.2 Analysis:**

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
1	Full support for the overall proposal	No 5	Allow	Accept

One submission was received for full support for the allocation of land for full Crown ownership and control, Crown control and freehold disposal.

The submitter noted that “the Preliminary Proposal as it stands will complete the soils conservation objectives inherent in the Soils and Water Conservation Plan agreement”.

The submitter “supports the Proposed Scenic Reserves R2, R3 and R4 (steep bush clad (Class VIII) streams) and R5 as natural extensions to the existing Alford Scenic Reserve. Is also satisfied that the proposal to

freehold most of the property fits in well with technical advice required on the land use capability of the land, and is unlikely to result in any soil conservation issues of concern for the management of the land identified.”

After consideration of the views expressed supporting the proposal these will be taken into account in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
2	Support retention of Reserves in full Crown Ownership and control	Nos. 3 and 6	Allow	Accept

Two submissions were received supporting the retention of R1, R2, R3, R4 and R5 (Reserve) in full Crown Ownership and control and in Crown control. Submission 3 notes that R1, R3 and R4 contain significant and valuable beech forest remnants along with range of other species including kowhai, putaputaweta, horopito, kanuka and broadleaf and although there is some gorse and broom present in places the remnants are a valuable conservation resource. This submission notes that R5 contains similar forest species as the adjacent Alford Scenic Reserve including kahikatea.

Submission 6 also noted that the forest species are a valuable indigenous resource which under full Crown ownership and control, could be improved.

As the retention of land in full Crown ownership and control and in Crown control is enabled by the Crown Pastoral Land Act 1998 , after due consideration of all views, the point supported by the submitters will be included in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
3	Include Mt Alford mid slopes and basins in Crown Ownership as part of a larger reserve.	Nos. 1, 3, 4 and 6	Allow	Not Accept

Four submissions were received which related to including Mt Alford mid slopes and basins in land retained in Crown Ownership as part of a larger reserve.

Submitter 1 noted that the proposed designations report included extending the existing Alford Scenic Reserve with a sizable new area on the slopes above the reserve up to Mt Alford. The submitter also noted that only fragments of the land are now included in the proposal

and contend that this is a retrograde step and submit that a larger reserve would be more viable both in ecological and landscaped terms.

Submitter 3 advocated "that the mid altitude slopes and basins of the eastern faces of Mt Alford should be included in a much larger reserve to be retained in full Crown ownership and control, that includes all the areas recommended for protection in R1, R2, R3, R4 and R5, but also all the area between and surrounding these proposed conservation areas. This total area is shown as RA on the attached map."

The mid altitude eastern faces of Mt Alford are made up of gentle rolling slopes and basins containing extensive areas of red tussock and sizable wetland and although degraded to some extent by grazing both these vegetation communities are under-represented in conservation lands throughout the country and deserve protection.

Submitter 3 supported retention of the forest remnants but contended protection of the wider area, taking in land between R1 and R2/R5 is desirable to provide aesthetic and ecological continuity and integrity, to protect landscape values and prevent unnecessary fragmentation of new conservation lands.

Submitter 6 also commented on the mid altitude eastern faces of Mt Alford comprise gentle rolling slopes and basins which contain extensive areas of red tussock grassland and an important wetland and advocates for there inclusion as part of a larger reserve.

Submitters 3 and 6 stated that the existing proposed network of reserves and easements is unnecessarily complex and fragmented. Easements "b-o-p-q" and "m-n" would be unnecessary if reserve RA (submission 3 coding) was adopted.

Submitter 4 "also proposed that the area delineated for full Crown ownership be expanded to a larger single area encompassing R2, R3, R4 and R5 and be contiguous with the existing Alford Scenic Reserve. The submitter considers that the present area is inadequate and in its present form the blocks will be more difficult to manage, will be ecologically less viable and with the exception of R2 none will be legally accessible by the public.

After consideration of the points made the suggestions to retain a larger area in Crown ownership is not accepted and will not be included in the proposal. The key conservation values lie within the bush gullies and the higher altitude area taking in Mt Alford itself included in land being retained in Crown ownership. While these may be fragmented the open tussock land between the proposed new scenic reserve areas has in the main been modified to the extent that it has lost a lot of its natural values.

Public access is being provided by a combination of public road, through Alford Scenic Reserve and R2(Scenic) and two sections of easement. This will provide access to the upper Mt Alford block..

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
4	Support freehold disposal of Cutty Grass Hut Block and Mt Alford south and northeast faces	No. 3	Allow	Accept

Submission 3 expressed support for the proposal to freehold the land in the Cutty Grass Hut Block, as shown as area FA in the submitters map and to freehold the land on the south and northeast faces of the Mt Alford block shown as FB and FC on the map.

As the disposal of land is enabled by the Crown Pastoral Land Act 1998 , after consideration of all views the point supported by the submitter will be included in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
5	Include areas along edge of North Branch of Ashburton River in land retained for full Crown ownership.	Nos. 3 and 6	Allow	Not Accept

Submitters 3 and 6 both contended that land bordering the North Branch of the Ashburton River has outstanding scenic, amenity and recreation values and submitted that the creation of a 20 metre marginal strip along the banks of the river would be inadequate to protect these values and provide reasonable practical access to the river for public enjoyment.

Submitter 3 contended that the natural beauty of the river and its margins makes it very attractive recreational setting for walking, picnicking, swimming, fishing and kayaking and argued that “the preliminary proposal as advertised does not facilitate this and so is inconsistent with the objective in the CPLA to; *secure public access to and enjoyment of high country land*”.

Submitter 3 noted “the preliminary proposal as notified provides for no public access along the existing farm track (i-j) that provides the only existing practical access along the river valley. Similarly there is no access available from this track to the river at any point along its length.” The submitter advocated for the retention of land between the river and farm track in full Crown ownership and control as a means of providing access and protection of the conservation values along the river margin. Submission 6 was along the same lines.

After consideration of pertinent matters the suggestion to retain the strip between the river up to and including the farm track is not accepted and will not be included in the proposal. The area in question has an unformed road lying between the river and the reviewable land and together with the steep nature of parts of the bush clad area affords protection against stock intrusion.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
6	Include areas comprising a wetland adjacent to State Highway 72 and lands on Pudding Hill Range.	Nos. 1, 3 and 6	Not allow	Not Accept

Submissions 1, 3 and 6 advocate for the inclusion of bush and open slopes within the Pudding Hill Stream catchment and a small wetland adjacent to State Highway 72 in the review. Whilst these areas were noted in the Conservation Resources Report there is no agreement with the freehold owner to include the land in the review under section 30 Crown Pastoral Land Act.

As the additional land is not within the boundary of the land being considered in this particular preliminary proposal it is not a matter that the Commissioner of Crown Land could take into consideration.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
7	Withdraw from negotiations if significant gains are not secured for conservation, recreation and landscape outcomes.	No. 3	Allow	Not Accept

The submission urged the Crown withdraw from negotiations with the lessee if there is a failure to secure significant gains in terms of conservation, recreation and landscape outcomes suggested by the submitter and the property continue as a pastoral lease.

This point covers a number of issues raised in points 3, 5 and 9 and signalled the submitters wish to see changes to the proposal.

As points 3, 5 and 9 have not been accepted and no changes are to be made to the proposal for these matters point 7 is not accepted.



<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
8	Support the creation of public access easement	No. 1	Allow	Accept

The submitter voiced support for this easement, assuming it is a practical route, in preference to the use of the Telecom vehicle track.

As the creation of easements is provided for in the Crown Pastoral Land Act to enable public access and after consideration of all views, the point supported by the submitter will be included in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
9	Public access easement be extended from Mt. Alford Block to River and back to proposed reserve.	Nos. 1, 3, 4 & 6	Allow	Not Accept

Four submissions were received proposing the public access easement to be extended from Mt Alford Block to the river and then via an existing farm track back to proposed reserve. The current easement does not provide for a round trip.

Submissions 1 and 4 advocated for an extension in the access over Mt Alford and down the north western boundary fence of the Alford block and then via the existing farm track back to the start of "c-d". Submissions 3 and 6 also contended this should include both public access and for DoC management purposes in the event that the boundary of land for retention in Crown ownership exclude the track.

Submitter 6 stated "this track should be managed for public foot and mountain bike access, as well as for vehicular access for DOC management and for the owner."

After consideration of all views the request for public access descending from the upper Mt Alford block and then returning on the farm track is not accepted and will not be included in the proposal. Public access is available within the Ashburton River bed and where practical within an existing road reserve. Together with the easement being created these measures are considered to provide satisfactory public access.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
10	Public access to Cutty Grass Block and lands beyond	Nos. 1 & 4	Allow	Not Accept

Submitter 1 advocated for access up the North Branch of the Ashburton River and its tributary the Swift River by noting "beyond the upper end of the Alford Block there is no present public access and it is important that a marginal strip be laid off along the river boundary of the Cutty Grass block at the time of freehold disposal."

Submitter 4 expressed concern that there is no apparent public access up the Ashburton River adjacent to the Cutty Grass block. They suggested that the vehicle track (k-1) that is proposed for a DOC management easement be also designated an easement for public access, or a marginal strip be allocated on the North Branch Ashburton River adjacent to the Cutty Grass block.

Creation of marginal strips is a legislative requirement under Part IVA of the Conservation Act 1987 and is a matter for the Director-General of Conservation to administer. Consequently this sub-point is not accepted however investigation indicates that the North Branch of the Ashburton River will probably attract a marginal strip where the Cutty Grass block land abuts the waterway, subject to the formal process being completed.

As it is likely that a marginal strip will be created at the conclusion of the tenure review and will provide satisfactory public access the sub point requesting access over the farm track is not accepted and will not be included in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
11	Change to water supply easement concession	No. 2	Allow	Accept

The submission requested modification to clause 9.1 (f) of the easement concession and similarly to clause 9.1 (g) to permit the "installation and maintenance of the water supply off-take and pipeline" over both the proposed Scenic Reserve (R4) and part of the existing Alford Scenic Reserve. The submitter also requested changes to Schedule Two of the Proposal to provide for the extended provision for pipeline routes and off-take points, the points to be more precisely identified in the field.

As the provision of a concession is enabled under section 36(a) of the Crown Pastoral Land Act and in this case is to allow the installation and maintenance of a piped water supply for supply of stock water supply to land being disposed of by freehold disposal, the point has been allowed and the proposal amended.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Submission No.</i>	<i>Decision</i>	
12	Farm management easement concession over land adjacent to Alford Scenic Reserve and over track to Cutty Grass Block land.	Nos.3, 4 & 6	Allow	Not Accept

Submission 4 proposed an easement for farm management purposes along the sections of the vehicle track that pass through those parts (“b-e” and “f-h”) advocated for inclusion in the proposed reserve. This covers those sections of the track commencing at the junction of the Telecom track to where it enters the existing reserve and then emerges onto the reviewable land before finishing at the boundary of a small block in different freehold ownership.

Submitters 3 and 6 suggested farm management access be provided for along the farm track “i-j” with this being a consequence of the proposal to include the land between the river up to and including the track in Crown ownership.

This point would only be operative in the event that there was a negotiated change to the proposal resulting from consideration of Points 3 and 5. As Points 3 and 5 have not been accepted, consequently Point 12 is also not accepted and will not be included in the proposal.

***Discussion and conclusions:***

Discussion relevant to each point has been made under each listed point for simplicity and clarity.

The submissions that came under the jurisdiction of the Crown Pastoral Land Act fell into several main themes:

- Support for the allocation of land between the Crown and freehold disposal from one submitter
- while several submissions, while supporting the allocation of areas in Crown ownership and access provisions, called for additional public access and for additional land to be retained by the Crown. Consequential to the latter several submissions noted that a farm management easement may be required should the boundary of land in Crown ownership be extended.
- Public access to the Cutty Grass Hut and then points beyond along the route designated for DoC management purposes access and / or over a marginal strip adjacent to this land.
- One submission sought changes to one clause in the water supply easement concession and Schedule Two of the proposal.

- One point covering the inclusion of two areas outside of the pastoral lease boundaries falls outside of the Commissioner of Land jurisdiction for this tenure review.

After considering all views several points have not been accepted while others have. The proposal will not include points advocating for an expansion of lands retained in Crown ownership taking in the mid slopes between the upper Mt Alford block and the bush gullies nor will it include land adjacent to the river and at Pedersons Flat.

The call for extension of public access easement has also not been accepted. A point regarding marginal strips while not accepted under the Crown Pastoral Land Act will be dealt with at the conclusion of the tenure review under the Conservation Act.

Some points covered land outside of the reviewable area. In terms of the legislative requirements these matters could not be considered and were not allowed and therefore not accepted.

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**REPORT IN ACCORDANCE WITH CONTRACT 50346**

**Final Analysis of Iwi Submission for Preliminary Proposal**

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**File Ref:** CON/50000/16/12757/00/A-ZNO- **Submission No:** QVV 651 **Submission Date:** 4/5/2005  
**Office of Agent:** Christchurch **LINZ Case No:** **Date sent to LINZ:** 5/5/2005

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**RECOMMENDATIONS**

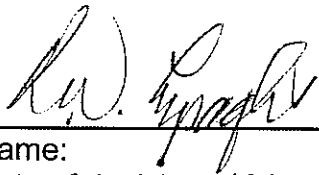
- (1) That the Commissioner of Crown Lands **notes** the receipt of this report for the review of Mt Alford Pastoral Lease.

**Signed by Contractor:**

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Barry Dench  
Team Leader for Tenure Review

**Approved/Declined by:**

  
Name:  
Date of decision: 12/5/05

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**(1) Details of lease:**

**Name:** Mt Alford

**Location:** Spoors Road and Alford Forest Settlement  
Road, Alford Forest, Mid Canterbury

**Legal Description:** Rural Sections 36413, 36415 and 36416 and Part  
Run 278

**Area:** 878.8141 hectares

**(2) Details of Iwi Submission:**

**Received On:** 24 June 2004

**Received From:** Takarei Norton  
Natural Resources Unit Project Co-ordinator  
Office of Te Runanga o Ngai Tahu

**On Behalf Of:** Te Runanga o Ngai Tahu and the relevant  
Papatipu Runanga: Te Runanga o Arowhenua  
and Te Taumutu

**(3) Analysis of submission:**

**3.1 Introduction:**

*Explanation of Analysis*

This is a final analysis of the submission received. The purpose of this final analysis is to determine whether to accept or not accept the points raised in the submission, to record the outcome of the consideration on each point and whether or not it has been approved for inclusion in the Substantive Proposal.

The following analysis:

- Summarises each of the points raised.
- Provides a discussion of the point.
- Records the CCL decision whether or not to allow/not allow the point for further consultation.
- Records the CCL decision whether to accept the point for inclusion in the proposal.

The following approach has been adopted when making the decision:

(i) To allow / not allow for further consultation:

The decision to “**Allow**” the point made by submitters is on the basis that the matter raised is a matter than can be dealt with under the Crown Pastoral Land Act 1998. Conversely, where the matter raised is not a matter that can be dealt with under the Crown Pastoral Land Act, the decision is to “**Not Allow**”. Those points that are ‘allowed’ will be given further consideration with respect to the proposal.

It should be noted that points relating to the Conservation Act, or any other statutory authority outside of the Crown Pastoral Land Act 1998 are not able to be considered by the Commissioner of Crown Lands.

(ii) To accept/ not accept:

The outcome of an “**Accept**” decision will be that the point is included in the draft Substantive Proposal. To arrive at this decision the point must be evaluated with respect to the following criteria:

- The objectives and matters to be taken into account in the Crown Pastoral Land Act (sections 24 & 25) and;
- The views of all parties consulted and any other matters relevant to the review, balanced against the objectives and matters to be taken into account in the Crown Pastoral Land Act 1998.

**3.2 Analysis:**

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Decision</i>	
1	Protection and access to two NZAA archaeological sites	Allow	Accept

There are two archaeological sites located on Mt Alford Pastoral Lease; K36/3 – Terraces / pits and K36/2 – Source quarry (K36 Map Sheet MS 260 Series). Ngai Tahu recommended that both sites be provided with an appropriate protection and access mechanism under the Crown Pastoral Land Act 1998 that meets the needs of Ngai Tahu Whanui.

As this request relates to protection of significant inherent cultural and historic values this point has been accepted and a conservation covenant will be created for protection of an area identified, for inclusion in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Decision</i>	
2	Protection or access mechanisms for North Branch of the Ashburton River.	Allow	Not Accept

Ngai Tahu noted that the Ashburton River / Hakatere is of utmost cultural, spiritual and traditional importance to Ngai Tahu.

The river is a statutory acknowledgement under the Ngai Tahu Claims settlement Act 1998. The following information has been taken from NTCSA 1998:

*“The Hakatere was a major mahinga kai fir Canterbury Ngai tahu. The main foods taken were tuna (eels), inaka (whitebait) and the giant kokopu.. Rats, weka, kiwi and waterfowl such as putakitaki (paradise duck) were also hunted along the river.*

*The tupuna had considerable knowledge of whakapapa, traditional trails and tauranga waka, places for gathering kai and other taonga, ways in which to use the resources of the river, the relationship of the people with the river and their dependence on it, and tikanga for the proper and sustainable utilisation of resources. All of these values remain important to Ngai Tahu today.*

Ngai Tahu expressed concern that there are no recommended protection or access mechanisms for the river and requested that the Commissioner provide an appropriate protection and access mechanism for the Ashburton / Hakatere under the Crown Pastoral Land Act that meets the needs of Ngai Tahu Whanui.

These matters were further considered and checked. A marginal strip is most likely to apply to land on the north side of the river , referred to as Cutty Grass block, that abuts the North Branch of the Ashburton River. Marginal strips where they do apply will provide a degree of access along with protection of riparian bush areas. An existing unformed road lies between the river and the Mt Alford block (south side of river) and in practical terms has the same effect as a marginal strip as far as access is concerned. After consideration it is felt that a new marginal strip affecting one part of the river and road reserve will provide adequate protection and no additional measure are required.

As the setting off of marginal strips is undertaken at the conclusion of tenure review under the jurisdiction of the Director-General of Conservation it is not a matter that the Commissioner can deal with under the Crown Pastoral Land Act. The point is therefore not accepted.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Decision</i>	
3	Protection or access mechanisms for the contributory streams	Allow	Not Accept

Ngai Tahu noted there are no protection or access mechanisms of the contributory streams of Mt Alford Pastoral Lease and request an appropriate protection and access mechanism for the contributory



streams associated with Mt Alford that meets the needs of Ngai Tahu Whanui.

The submission notes from the Conservation Resources Report that *“Galaxiids and bullies were noted in the contributory streams but no survey of their numbers has been undertaken. Further that “Riparian protection is the most effective way of ensuring long term habitat protection for freshwater fish and other freshwater biota”*

It is unlikely that marginal strips will apply to internal waterways on Mt Alford. These appear to be of insufficient width to meet the criteria for marginal strips and that some are within areas being retained in Crown ownership and therefore afforded protection for the freshwater habitat. After considering the views put forward it is felt that the proposal provides protection for the waterways with access being available within the new reserve and adjacent existing scenic reserve. On that basis the point is not accepted.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Decision</i>	
4	Protection or access mechanisms of the wetlands	Allow in part	Not Accept

Ngai Tahu submitted that there are two areas of wetlands on Mt Alford; Red tussock wetlands below Mt Alford and lowland Carex swamp at the junction of State Highway 72 and the road to Pudding Hill and seek protection for these as well as access thereto. This point is supported in the submission by the noting that many of the wetlands in Canterbury have been drained and it is significant that remaining areas are protected.

One of the wetlands is present within the reviewable land but the Carex swamp is on freehold land adjacent to State Highway 72.

The point requesting inclusion of an area outside of the reviewable land is not accepted as this land is not included in the tenure review. After considering all matters it is felt that no specific measures are warranted for the red tussock area under Mt Alford and therefore the point will not be included in the proposal.

<i>Point</i>	<i>Summary of Point Raised</i>	<i>Decision</i>	
5	Protection or access mechanisms of all significant areas of native vegetation	Allow	Not Accept

Ngai Tahu noted that the Conservation Resources Report records that there are a variety of areas on Mt Alford that contain areas of native vegetation such as beech forest. Their concern is not all areas of significant native vegetation have been provided with protection in the proposal.

The submission seeks an appropriate protection and access mechanism over all significant areas of native vegetation located on Mt Alford, that meets the needs of Ngai Tahu Whanui.

As a large proportion of the remnant beech and podocarp forest is being retained in Crown ownership along with areas of native vegetation on the mid to higher altitudes it is considered that these protect the significant areas of native vegetation. Public access is being provided by easement to a large part of these areas. As the measures in place already provide the protection and access sought the point is not accepted.

### *Discussion and Conclusions*

Te Runanga o Ngai Tahu has provided a submission that takes into consideration the local Maori interest in the Mt Alford Proposal. Each point is discussed in detail in this analysis.

Four of the five points have a similar theme of the protection of significant inherent values characteristic of a natural resource and access to areas exhibiting these values. The remaining point relates to two sites recorded under the New Zealand Archaeological Association system that are of interest to Ngai Tahu.

With the exception of the archaeological site where a conservation covenant is to be included in the proposal, changes are not required for the other matters raised.