

Crown Pastoral Land Tenure Review

Lease name: MT ALFORD

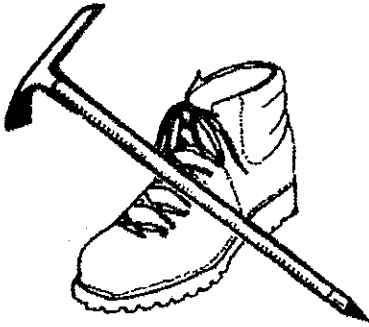
Lease number: PC 052

Public Submissions - Part 1

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

August 05

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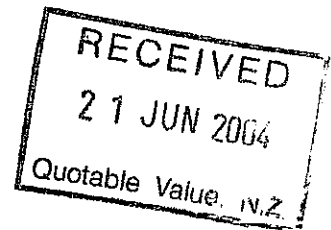
Christchurch Tramping Club Inc.

FORMED 1932

Affiliated to: FEDERATED MOUNTAIN CLUBS OF N.Z. INC.

PLEASE ADDRESS ALL CORRESPONDENCE TO THE HON. SECRETARY P O BOX 527, CHRISTCHURCH

Attention: Barry Dench, Team Leader – Tenure Review
Quotable Value Ltd
P O Box 13443
Christchurch



June 2004

Dear Mr Dench

Tenure Review of Mount Alford Pastoral Lease, PC052

I enclose the submission of the Christchurch Tramping Club (Inc) with regard to the Mt Alford Pastoral Lease

Yours sincerely

A handwritten signature in black ink, appearing to be "JH" with a flourish.

Jenny Harlow
Secretary
Christchurch Tramping Club

Enc.

CC: Mike Clare, Department of Conservation, Private Bag 4715, Christchurch.

Tenure Review of Mount Alford Pastoral Lease, PC052

A submission on the Preliminary Proposal prepared for the Christchurch Tramping Club (Inc.)

The Christchurch Tramping Club's Use of the Area

This club was formed in 1932 and has grown to become one of the larger and more active mountain clubs in Canterbury. Our membership is approximate 300 people of all ages. We organise several tramps each weekend and are regular users of the mid-Canterbury ranges and foothills.

Tenure Review in this District

Major changes in land tenure are occurring on land to the north of this lease owing to tenure review of several large pastoral leases on the south bank of the upper Rakaia River. A neighbouring lease, Mt Winterslow, has also entered the process and Government has recently purchased nearby Clent Hills lease. It is likely that all or most of the high altitude land on the block of mountains between the plains, the Rakaia River and the Lake Heron basin will become public land. It is therefore important to consider Mt Alford in the light of the overall pattern of land management in this district.

Land to be restored to full Crown Ownership

We note that the Department of Conservation's original designation proposals of September 1999 included an area of freehold land within the Pudding Hill Stream catchment which was then part of the property. This does not appear in the notified proposal so we assume it has become part of the public estate by negotiation outside tenure review. This is welcome as an addition to the public land in the Pudding Hill valley which has extensive bush areas with conservation and recreational value.

On the other hand we note that DOC's proposal included extending the existing Alford Scenic Reserve with a sizeable new area on the slopes above the reserve up to Mt Alford. Only fragments of this original extension proposal appear in the documents open for public discussion. This is a retrograde step and we submit that a larger reserve will be more viable both in ecological and landscape terms.

Public Access

The Proposal includes a public foot easement marked c-d, m-n. We assume that this is on a practicable route that will be marked. If so, we support this access as being preferable to the earlier proposal for access via the Telecom vehicle track.

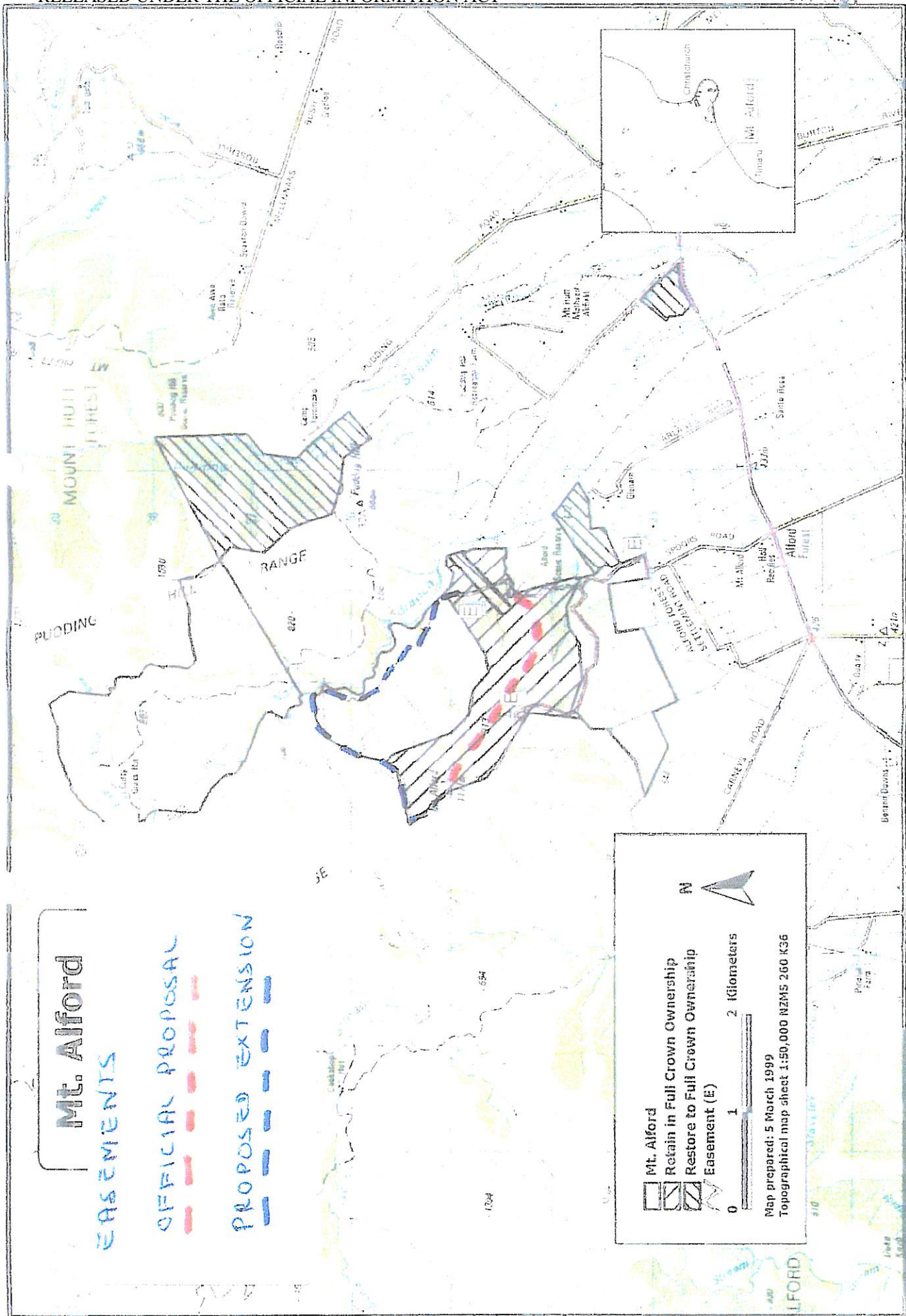
However this provides only a single access to Mt Alford with no possibility of a round trip. Consequently we submit that this easement should be extended over Mt Alford and down the north western boundary fence of the Alford block and then via the existing farm track back to the start point of c-d. This will provide an interesting circuit day tramp which will enhance public use of this area.

In the light of the growing area of public land discussed above it is important that public access be ensured up the north branch of the Ashburton River and its tributary the Swift River. The bed of the Ashburton River adjacent to the lower Alford Block is Crown Land. The legal road line on the south back of this river is effectively a marginal strip which protects this access from any presumption of *ad medium filum* rights.

However beyond the upper end of the Alford block there is no present public riparian access and it is important that a marginal strip be laid off along the river boundary of the Cutty Grass block at time of freehold disposal.

David Henson
Andrew Turton
9.6.04

Attached: map showing proposed circular public foot easement





Commissioner of Crown Lands
Care of Quotable Value Limited
PO Box 13-443
CHRISTCHURCH

Attention; Tenure Review Team Leader

23 June 2004

Subject: Submission on Tenure Review Preliminary Proposal, Mt Alford Pastoral Lease

Dear Sir,

In the matter of the tenure review of the Mt Alford Pastoral lease Mt Alford Station Limited (the lessee) makes the following submissions.

1/ In the matter of the Easement Concession for the installation and maintenance of a pipeline for supplying stock water for Mt Alford Station Limited the schedule Two of the Preliminary Proposal, page 14 2.2 'Description of area where proposed activity to be carried out and proposed status', the following paragraph should be changed to read as follows;

This Easement is along a stream in the Alford Scenic reserve and the proposed extension to Alford Scenic Reserve. A water supply pipe or pipes will be installed to leave the stream at between Grid reference K36 (NZMS260) 884340 and GR 891346. The pipeline will be installed to provide gravity drainage water supply and as such will follow the land contour for up to 200m within the Scenic Reserve Area. The final location of the off-take(s) will be agreed with staff of the Department of Conservation prior to installation.

2/ The Easement concession document attached to the Preliminary proposal should be modified to include the extended provision for pipeline route(s) and off-take points.

Also on the easement concession document page 4 section 9.1 (f) the words 'except as required to install and maintain the water supply off-take and pipeline' should be added to the clause which forbids construction and earthworks. The same clause should be added to 9.1 (g) which forbids disturbance of a watercourse.

The modifications above will avoid the need for pumping water as would be required if the proposed provisions are left as drafted. The likely effects on the stream and reserve area will be absolutely minimal. In all probability the installation will be effected by hand with a small cement or sandbag structure in the stream bed and surface laid pipe. The possibility needs to be allowed for a pipe ripped into the side of the current vehicle track and for maintenance of the off-take using machinery in the event of flood or landslip damage. The proposed changes will allow flexibility to allow a practical solution to the problem created by fencing off the stock water access.

Yours Sincerely

Murray Hawkes

Director

Mt Alford Station Limited.

23-Jun-04

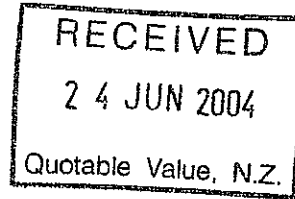
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Royal Forest and Bird Protection Society
PO Box 2516
Christchurch Mail Centre

Ph 03 366 0655

21 June 2004

Quotable Value Limited
PO Box 13-443
Christchurch



Attention: Barry Dench

Dear Barry

Submission on Preliminary Tenure Review Proposal for Mount Alford Pastoral Lease

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."

This submission is based on a thorough analysis of the "Summary of the Preliminary Proposal for Tenure Review of Mt Alford Pastoral Lease", the Department of Conservation's "Conservation Resources Report" for the property and other associated documents, as well as a field inspection of the property in June 2004.

Mount Alford Summit Block (R1)

The upper slopes of Mt Alford lying within the property contain largely intact, high value snow tussock and *dracophyllum* shrublands. Mountain flax and *Celmisia* are also abundant. The native vegetation is in very good condition and provides virtually 100% of the ground cover except for a few wilding pines and areas where bare rock naturally occurs. Individual plants tend to be large and healthy and exhibit little evidence of impacts from grazing or browsing.

The area provides stunning views of Mt Hutt to the north, Mt Somers to the south and across the Canterbury plains in all directions with Banks Peninsula and the coast clearly visible. There is potential for exciting new day walking and longer overnight tramping opportunities through linking public access to this area now with future access opportunities provided through tenure review of the adjoining Winterslow property.

Forest and Bird strongly supports the retention of the area R1 in full crown ownership and control.

Mount Alford Lower Slopes, Gullies and Flats (R2, R3, R4 and R5)

The two major gullies on the lower east facing slopes of Mt Alford (R2, R3 and R4) contain significant and valuable beech forest remnants. Mountain beech dominates but there is a diverse range of other species present in relative abundance including kowhai, putaputaweta, horopito, kanuka and broadleaf. The forest quality is mixed with gorse and broom present in places and damage by stock evident. However, in the context of the very few remaining beech forests left in the wider Canterbury region these remnants are a valuable conservation resource and Forest and Bird supports their retention in full Crown ownership and control.

The flats immediately to the north of and adjoining the Alford Scenic Reserve (R5) are an extension of the reserve forest and contain similar species composition including kahikatea. Again forest and bird supports the retention of this forest in full Crown ownership and control.

Mount Alford Mid Slopes and Basins

Forest and Bird submits 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. We note that this is consistent with the recommendations of the Department of Conservation in their conservation resources report of 23 September 1999. These recommendations were later supported in drafting instructions for the preliminary proposal by the agent to the CCL, but have subsequently been substantially reduced in the preliminary proposal notified.

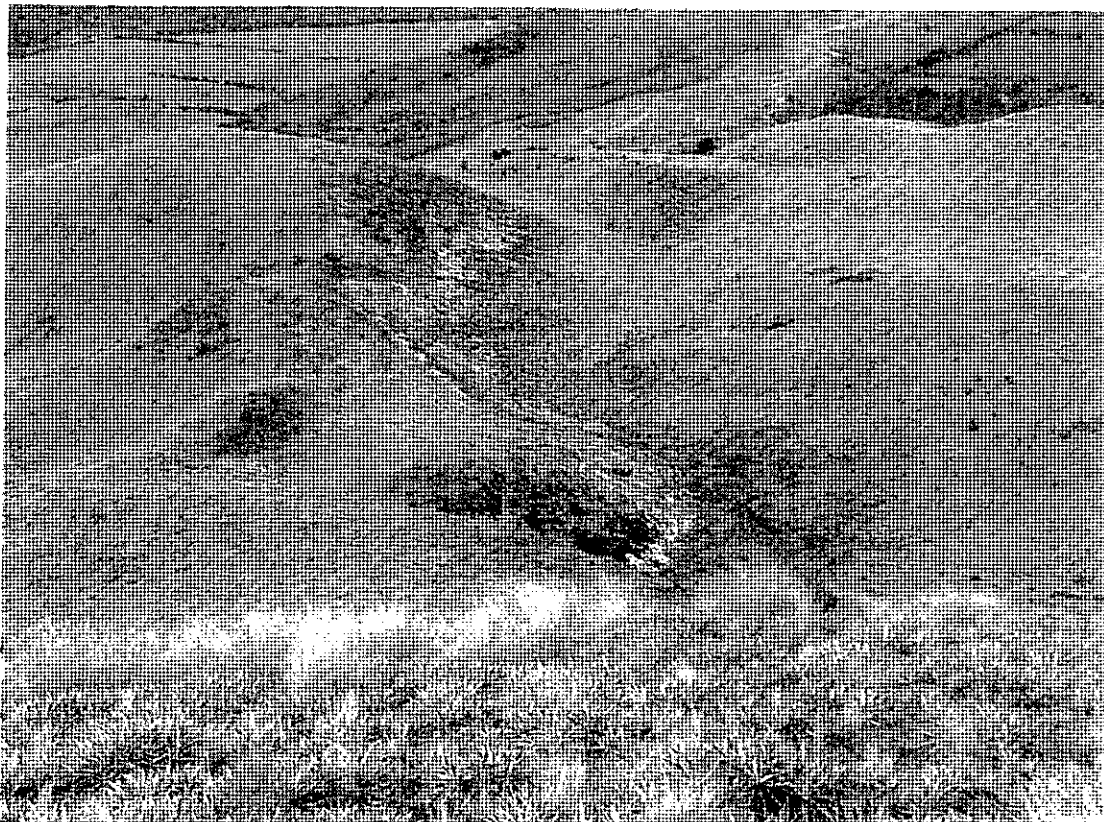
The reduction has resulted in only 115.5ha of the recommended 250ha being designated as land to be retained in full Crown ownership and control. This represents only 13% of the total area of the property (878.8ha) and is not a fair return to the Crown in terms of the value of its current interest in the land as a pastoral lease.

Besides protecting additional conservation values the boundaries proposed by this submission have the additional advantages of administrative simplicity, reduced survey costs, reduced initial fencing costs and ongoing fence maintenance, more practical fencing lines and easier management of public access with a reduced need

for easements. In our view 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 was adopted.

The mid altitude eastern faces of Mt Alford are made up of gentle rolling slopes and basins. The basins contain extensive areas of red tussock grassland and a sizeable wetland (see fig 1). Although degraded to some extent by grazing both these vegetation communities are under-represented in conservation lands throughout the country and deserve protection. Exclusion of stock would certainly encourage healthy regeneration. The New Zealand Biodiversity Strategy has as an objective to add to public conservation lands those habitats and ecosystems that are not represented within the existing protected area network. Wetlands in particular require urgent protection with over 90% of New Zealand's original wetlands having been filled, drained or extensively modified.

Fig 1: Wetland and Tussock Grasslands in the Basins Below Mt Alford. The Boundary of the Proposed Reserve RA Follows the Ridge in the Centre -- Left of the Image



Short tussock grassland communities cover most of the mid-slopes. In general these communities have been modified over the whole property by over-sowing, top-dressing and grazing, and introduced grasses now dominate. However, where native tussocks provide about 10% of the cover in these vegetation communities across the property as a whole, they provide 30% - 40% cover in some parts of this area. This part of the property certainly contains the best example of short tussock grasslands on the lease. Removal of grazing pressure would assist in the regeneration of the tussocks (see fig 2).

Fig 2: The Effect of Grazing Pressure on Tussock Grasslands on the Property –Recent Grazing has Occurred on the Left Side of the Fence.



While several small isolated and discrete forest remnants do have ecological value on their own, their value increases dramatically if they can be managed as a single unit so that regeneration is allowed to occur between them. "Edge effects" such as weed infestation, wind damage, animal pest control, boundary fence construction and maintenance are minimized where the reserve area is larger in relation to its perimeter.

As stated earlier in this submission Forest and Bird supports the retention of the forest on the lower slopes in full crown ownership and control but emphasizes that conservation values do not stop at the forest edge. The protection of the wider area is desirable to provide aesthetic and ecological continuity and integrity, to protect landscape values and prevent unnecessary fragmentation of new conservation lands. The proposal to fence the forest edge and use this as the boundary between the new conservation areas and freehold land will create an unnatural and distinct separation between forest and pasture, rather than a natural transition from forest to shrubland to short tussock and finally snow tussock. The natural vegetation succession from valley floor to tops and all the transitional habitats for birds and invertebrates will be lost.

Cutty Grass Hut Block

The vast majority of this northern block is highly modified short tussock grasslands. Introduced grasses dominate with short tussocks providing on average only about 10% of the cover. Conservation values are low and Forest and Bird therefore supports the proposal to freehold this land. It is shown as area FA on the attached map

Mount Alford Block South and Northeast Faces

The mid and lower slopes of the Mt Alford block outside of the area shown as RA on the attached plan are mostly degraded short tussock grasslands dominated by introduced grasses with little conservation value. There is a sizeable area of beech forest and other patches and individual beech trees on the south facing slopes below the vehicle access track, but this too has been highly modified by stock and possibly past burning and logging. There is little in the way of under-storey regeneration and pasture grasses provide much of the ground cover. The beech trees certainly retain amenity and landscape value but the ecological value has been substantially degraded and there are other forested areas on the property with much higher conservation value.

Forest and Bird therefore supports the proposal to freehold the land on the south and Northeast faces of the Mt Alford block. These areas are shown as FB and FC on the attached map.

Protection of River Margins

The north branch of the Ashburton River that borders the property has outstanding scenic, amenity and recreation values. There are also significant conservation values in the forest remnants adjacent to the river. Forest and Bird submits that the creation of a 20m marginal strip along the banks of the river is inadequate to protect these values and provide reasonable practical access to the river for public enjoyment.

Fig 3 illustrates that the steepness of the gorge makes access along the river-bank impractical. The natural beauty of the river and its margins make it a very attractive recreational setting for walking, picnicking, swimming, fishing and kayaking. 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

We note that Fish and Game in their letter of 20 December 2000 regarding tenure review of the property highlight the need, *to retain the fishery values particularly the wilderness ones that presently exist and access to them for future generations.*

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.

Fig 3: The Scenic, Amenity and Conservation Values of the North Branch of the Ashburton River

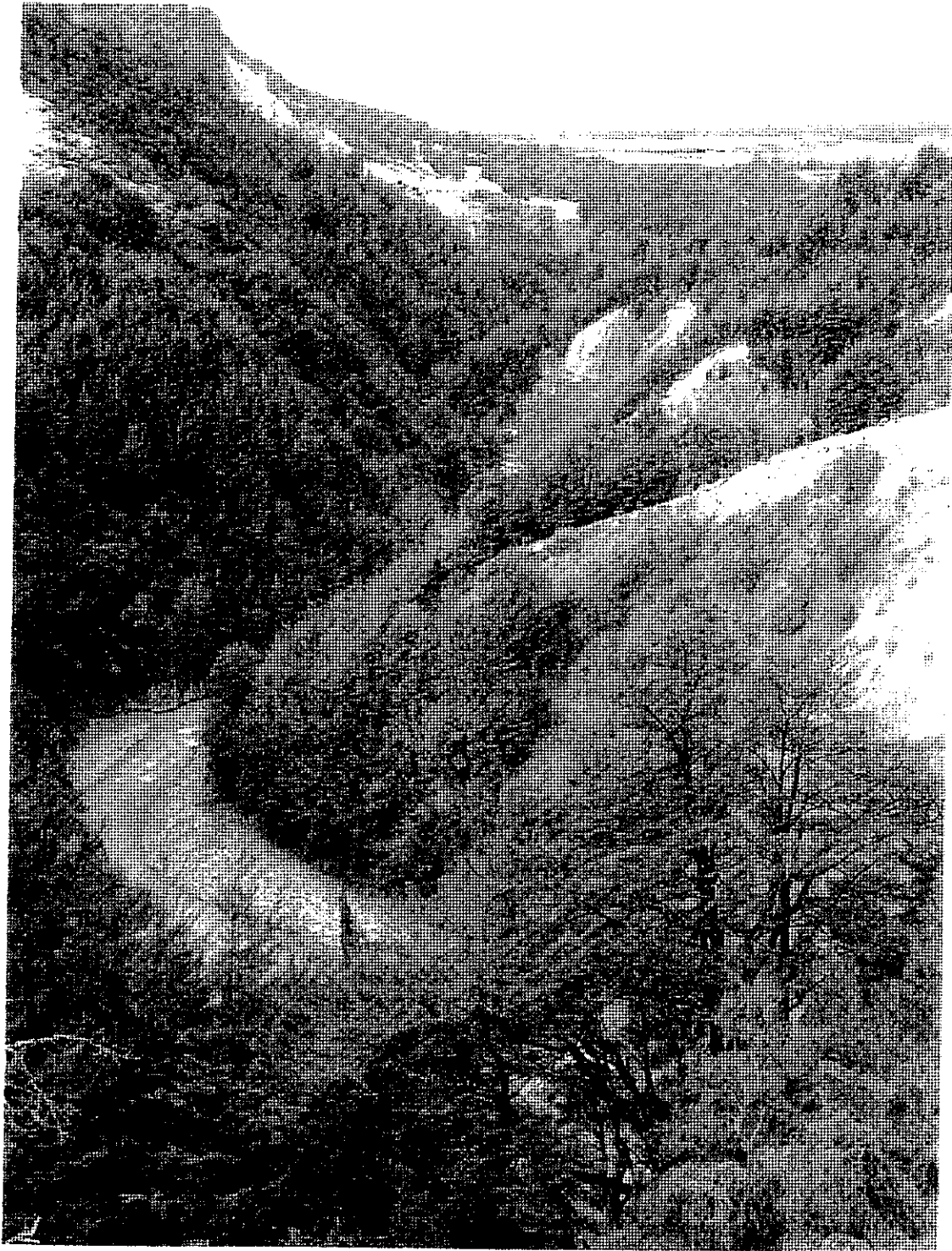


Fig 4: Significant Beech Forest Remnant Opposite Pt 668 with no Protection in the Preliminary Proposal

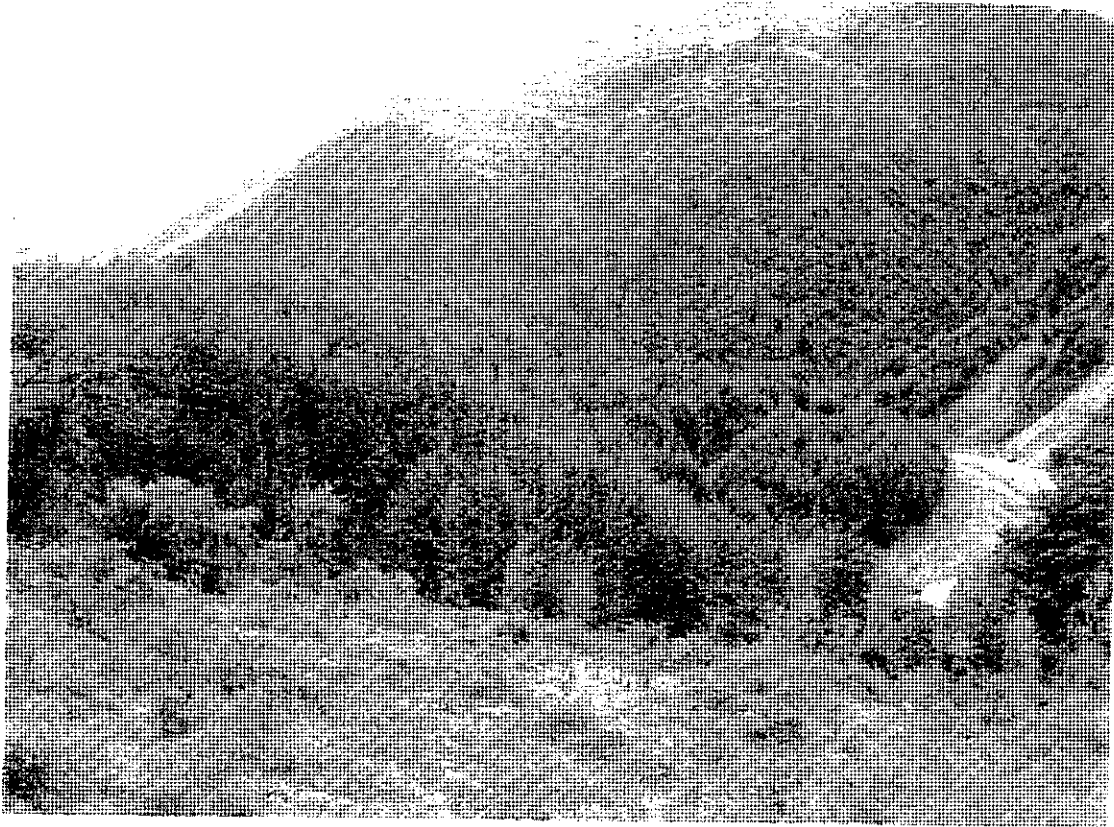


Fig 4 is an example of one of the many beech forest remnants and shrublands with conservation value along the river margin within the property that have not been protected in the preliminary proposal.

To address access concerns and the protection of additional conservation values along the river margins Forest and Bird submits that all the area north of Alford Scenic reserve and between the river and the existing track should be retained in full Crown ownership and control. The track itself provides a logical and practical boundary between future conservation and freehold land. This area is shown as RB on the attached map.

The track should be managed for public foot and mountain bike access, DOC vehicular access and for stock and vehicular access for the leaseholder with appropriate easements to this effect dependent on the final boundary being located in the most practical position for fencing.

Parts of this area, including terraced river flats with improved pasture, have been grazed extensively and could continue to be grazed sustainably without further ecological damage providing there is adequate fencing of forested areas and the river margin. In our view this would be best achieved by granting long term grazing concessions over the appropriate areas as part of the settlement agreement.

Protection of Conservation Values on Freehold Land

The Conservation Resources Report for the property notes the existence of a significant wetland adjacent to State Highway 72 and an area of about 150ha of beech forest and tussock grasslands on the north east side of the Pudding Hill range, both owned under freehold title by the leaseholder of Mt Alford.

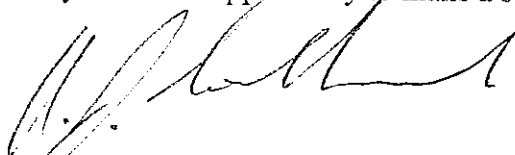
Forest and Bird submits that the tenure review process for Mt Alford lease is an ideal opportunity to include protection of these areas in the review negotiations and settlement.

Decision Sought

1. That the areas marked RA and RB on the attached map are retained in full Crown ownership and control for conservation purposes to protect significant ecological, recreational and landscape values.
2. That the areas marked FA, FB and FC on the attached plan are disposed of as freehold title to the leaseholder.

If negotiations with the leaseholder fail to secure significant gains in terms of the conservation, recreation and landscape outcomes suggested in this submission Forest and Bird strongly urges that the Crown withdraw from negotiations and the property continue as a pastoral lease.

Thank you for the opportunity to make a submission



Tony Lockwood
Field Officer
For Conservation Manager