

# Crown Pastoral Land Tenure Review

Lease name: MT ALFORD

Lease number: PC 052

**Public Submissions** 

- Part 4

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

**August** 

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Commissioner of Crown Lands, C/o Contract Manager, Tenure Review, Quotable Value Ltd., PO Box 13443, CHRISTCHURCH.. 22 June, 2004.

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1 JUL 2004

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# SUBMISSION ON PROPOSED TENURE REVIEW: Mt ALFORD PASTORAL LEASE

Dear Sir.

Thank you for sending me a copy of this document and I appreciate the opportunity to comment on it, based on my knowledge of the areas involved, particularly the snow tussock grasslands of the Pudding Hill Range and Alford Forest. I am concerned with the disproportionate separation of this pastoral lease of 879 ha, which is highly in favour of freehold disposal. I have relied on the Department of Conservation's Resources Report, available on the LINZ Web site, for some of the more detailed information on the property. I believe there are important inherent values in some of the areas that have been proposed for freeholding, as follows:

Mount Alford Summit Block (R1)

The upper slopes of Mt Alford that lie within the property contain largely intact, mixed narrow-leaved snow tussock grassland with *Dracophyllum* shrublands, together with mountain flax and species of *Celmisia*. The indigenous vegetation here is in generally good condition and provides virtually all of the ground cover except for a few wilding trees and areas of naturally bare rock.

This area could be readily accessible to the interested public for day walking and longer overnight hiking that could be expected through tenure review of the adjoining property. The retention of the area R1 in full Crown ownership and control is thus strongly recommended.

Mount Alford Mid and Lower Slopes, Gullies and Flats (R2, R3, R4 and R5) The two major gullies on the lower eastern aspect slopes of Mt Alford (R2, R3 and R4) contain valuable remnants of mountain beech forest. There is also a diverse range of other native species present including kowhai (Sophora microphylla), Carpodetus serratus, peppertree (Pseudowintera), broadleaf (Griselinia) and kanuka (Kunzea). The condition of the forest stands is mixed with some gorse and broom present in places and some evident damage by stock. However, given the very limited remaining beech forest stands left in this region of Canterbury, these remnants are a valuable indigenous resource which, under appropriate conservation management, could be greatly improved, and thus they should be retained in full Crown ownership and control. Continuity between some of these areas, particularly R2, R3, R4 and R5,

together with the flats immediately to the north of and adjoining the R5 block, are essentially an extension of the forest reserve and contain a similar composition, including kahikatea (*Dacrycarpus*). Continuity between these presently separated forest stands would greatly enhance the long-term viability of the overall forest and should be achieved as part of the tenure review exercise, if posssible. The inclusion of the R1 Block would also be highly desirable in this context, as was also recommended by the Department of Conservation in their 1999 Conservation Resources Report. Although supported in the drafting instructions for the preliminary proposal by the agent to the CCL, they were subsequently substantially reduced in the preparation of this preliminary proposal. This reduction has resulted in only 116ha of the earlier recommended 250ha now being recommended as land to be retained in full Crown ownership and control, and representing only 13% of the total area of the property, an unacceptably small proportion given the important potential ecological values of the areas which have been excised.

Continuity of the forest stands plus the additional advantages of future management and administrative simplicity, reduced survey and fencing costs, and more practicable fencing lines, plus easier management of public access and the reduced need for easements, are all aspects which should favour this recommendation. Moreover, continuity of the protected area rather than the fragmentation associated with the current proposal, would provide for marginal spread of the forest stands and their eventual linkage, given apropriate conservation management. The existing proposed network of reserves and associated easements would also result in an unnecessarily complex and fragmented pattern of conservation areas. With continuity, as recommended, the easements b-o-p-q and m-n would be unnecessary.

### Mid-altitude non-forest ecosystems of Mt Alford.

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. Although somewhat degraded by past grazing both these communities are substantially under-represented in conservation lands on the eastern Canterbury foothills and thus deserve protection in full Crown ownership and control. An appropriate boundary should be negotiated to achieve this outcome as an aspect of this tenure review.

The short tussock grassland communities which occupy much of the midslopes have been generally more highly modified, particularly by over-sowing and top-dressing so that introduced grasses now dominate. Although the removal of grazing would facilitate some recovery of the tussocks full restoration is unlikely so that retention of any such areas in Crown ownership cannot be justified.

## Protection of Margins of the Ashburton River, North Branch.

The north branch of the Ashburton River which borders the property has important scenic, recreation and amenity values. There are also important conservation values in the forest remnants adjacent to the river. Creation of a standard marginal strip along the banks of this river would be inadequate to protect these multiple values and also provide practical access to the river for public use and enjoyment. Walking access along the river-bank is impractical due to the steep nature of the gorge, while the natural setting of the river and its vegetated margins make it a very attractive recreational setting for a wide range of activities including walking, picnicking, fishing, swimming and fishing, as well as kayaking. The preliminary proposal as

advertised would not provide for these activities and so is inconsistent with the objectives of the relevant legislation which is to:

"Secure public access to and enjoyment of high country land"

Neither does the preliminary proposal provides for public access along the existing farm track (i-j) which is the only practical access along the river valley. Similarly there is no access available from this track to the river at any point along its length. To address the important issue of access and the protection of the important conservation values along the river margins it is recommended that all of the area north of Alford Scenic Reserve and between the river and the existing track should be retained in full Crown ownership and control. Moreover, this track in itself, provides a logical and practicable boundary between the land to be freeholded and the proposed future conservation areas. This track should be managed for public foot and mountain bike access, as well as for vehicular access for DoC masnagement and for the owner, for stock and vehicular access in relation to the final boundary being located in relation to the most practicable line for fencing.

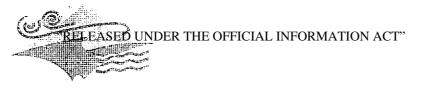
# Protection of Conservation Values on Freehold Land

The Conservation Resources Report notes and an area of ~150ha of beech forest and tussock grassland on the northeast side of the Pudding Hill Range together with the presence of an important wetland adjacent to State Highway 72. All these areas are owned under freehold title by the leasee of Mt Alford Run. It is recommended that the present tenure review would be an appropriate time to achieve protection of these areas on the property.

I appreciate this opportunity to comment fromally on this roposal and I trust my comments and recommendations will be givebn serious consideration.

Yours sincerely,

Alan F. Mark FRSNZ



## **NGAI TAHU** Development

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22 June 2004

Barry Dench QV Valuations PO Box 13 443 CHRISTCHURCH

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Tēnā koe Barry,

#### Ngāi Tahu Submission for Mt Alford Pastoral Lease

Te Rūnanga o Ngāi Tahu and the relevant Papatipu Rūnanga: Te Rūnanga o Arowhenua and Te Taumutu Rūnanga have considered the information provided in the Mt Alford Preliminary Proposal and have the following comments:

#### **Archaeological Sites**

There are two NZAA archaeological sites located on Mt Alford Pastoral Lease; K36/3 – Terraces / pits and K36/2 – Source quarry. Ngãi Tahu recommends that both these archaeological sites are provided with an appropriate protection and access mechanism. Ngãi Tahu is happy to discuss options for protection and access with the Commissioner.

Recommendation: That both archaeological sites located on Mt Alford Pastoral Lease are provided with an appropriate protection and access mechanism under the Crown Pastoral Land Act (1998) that meets the needs of Ngāi Tahu Whānui.

#### Ashburton River / Hakatere

The Ashburton River / Hakatere is of utmost cultural, spiritual and traditional importance to Ngāi Tahu. The Ashburton River / Hakatere is a Statutory Acknowledgement under the Ngãi Tahu Claims Settlement Act (1998). The following information is extracted from the NTCSA 1998.

"The Hakatere was a major mahinga kai for Canterbury Ngāi Tahu. The main foods taken were tuna (eels), inaka (whitebait) and the giant kokopu. Rats, weka, kiwi and waterfowl such as pūtakitaki (paradise duck) were also hunted along the river.

The tūpuna 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 those values remain important to Ngāi Tahu today".

Ngãi Tahu is concerned that there are no recommended protection or access mechanisms for North Branch of the Hakatere River. The Ashburton River / Hakatere contains significant inherent cultural and historical values which require the appropriate protection and access mechanisms.

Recommendation: That the Commissioner provides an appropriate protection and access mechanism for the Ashburton River / Hakatere under the Crown Pastoral Land Act (1998) that meets the needs of Ngãi Tahu Whānui.

Contributory Streams associated with Mt Alford Pastoral Lease

#### "RELEASED UNDER THE OFFICIAL INFORMATION ACT"

The Conservation Resource Report outlines that "Galaxiids and bullies were noted in the contributory streams but no survey of their numbers has been undertaken. The following species are likely to be represented: upland bully, Canterbury galaxies, alpine galaxies and longfinned eel. Riparian protection is the most effective way of ensuring long term habitat protection for freshwater fish and other freshwater biota."

In the Preliminary Proposal there are no protection or access mechanisms of the contributory streams of Mt Alford Pastoral Lease.

Recommendation: That the Commissioner provided an appropriate protection and access mechanism for the contributory streams associated with Mt Alford Pastoral Lease under the CPLA 1998 that meets the needs of Ngāi Tahu Whānui.

#### Wetlands

The Conservation Resource Report outlines that there are two areas of wetlands on Mt Alford Pastoral Lease; Red Tussock Wetlands below Mt Alford and Lowland Carex Swamp at the junction of SH77 and the road to pudding hill. Considering that most wetlands within the Canterbury region have been drained it is significant that all remaining wetlands within the Canterbury region are provided with protection.

**Recommendation:** That the Commissioner provided a protection and access mechanism to the wetlands located on Mt Alford Preliminary Proposal.

### Mahinga Kai / Areas of Native Vegetation

According to the Conservation Resource Report there are a variety of areas on Mt Alford Pastoral Lease that contain areas of native vegetation such as beech forest. Ngãi Tahu is concerned that not all areas of significant native vegetation on Mt Alford Preliminary Proposal are provided with a protection and access mechanism.

Recommendation: That all significant areas of native vegetation located on Mt Alford Pastoral Lease are provided with an appropriate protection and access mechanism under the CPLA 1998 that meets the needs of Ngāi Tahu Whānui.

If you have any queries please do not hesitate to contact me.

Heoi ano

Takerei Norton

Kairuruku Pürero Ngā Rawa Taiao

Natural Resources Unit Project Co-ordinator

CC

Mandy Waaka Homes Terrianna Smith