

Crown Pastoral Land Tenure Review

Lease name : OBELISK

Lease number : PO 264

Public Submissions Part 2

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

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Submission 7

SUBMISSION ON

PRELIMINARY TENURE REVIEW PROPOSAL

OBELISK PASTORAL LEASE, FRUITLANDS



CENTRAL OTAGO-LAKES BRANCH Royal Forest and Bird Protection Society Inc



February 2014

Submission 7

3 February 2014

Forest & Bird

Commissioner of Crown Lands

CBRE House, 112 Tuam St

Private Bag 4721

CHRISTCHURCH 8140

Dear Sir

Preliminary Proposal for Tenure Review of Obelisk Pastoral Lease (Po 264)

This is a submission on behalf of the Central Otago-Lakes branch of the Royal Forest and Bird Society (formerly Upper Clutha branch).

Thank you for forwarding to us this proposal, and we would be pleased if you would accept this submission. We also thank you for your assistance in arranging an inspection of the property, which was carried out on 13 December 2013.

Our branch of the Society seeks to ensure the objectives of the Crown Pastoral Lands Act 1998 (CPLA) are met in pastoral lease tenure reviews. We have been involved in the process of tenure review and the writing of submissions on tenure review proposals for many years now. We have within our membership people who are well qualified to comment on any preliminary proposal: a soil scientist, botanists and ecologists, an archaeological expert, and a landscape architect formerly contracted to the Dept. of Conservation to carry out landscape and natural value assessments on pastoral leases.

In preparing our submission, we have read and studied the Conservation Resources Report and Plans (CRR) for Obelisk.

We provided the Commissioner with a brief preliminary report dated 31 March 2010 on what we considered to be the values and desirable outcomes for a tenure review of this lease, following a field visit in January 2010. We are pleased to see that our suggestions have been given effect to in part in this preliminary proposal.

The points we set out then are still most relevant but there have also been significant changes in our understanding of the values of the South Island high country since then, in particular the importance of native shrublands and lower altitude communities and ecosystems generally. Failure to ensure adequate protection of lower altitude land, and a misplaced reliance on district planning to achieve protection are now widely recognised (including by government) as shortcomings in the tenure review process to date. We examine tenure review proposals carefully in the light of these issues.

Our Submission:

Proposed Conservation Area CA1

880ha of range crest tall tussock land on the east face of the Old Man Range, essentially the headwater basin of Butchers Creek and the summer grazing block to the south in the Obelisk

Creek and (minimally) Coal Creek headwater. A new boundary fence about 2km long is proposed crossing the Butchers Creek basin, at around the 1000m contour. No protection of the tall tussock cover and landscape values on the land between the existing and proposed fence is proposed.

Our submission is:

- 1. We support the creation of CA1
- 2. 2. that the proposed new boundary fence in Butchers Creek basin is poorly positioned with respect to protecting landscape and ecological SIVs. We recommend a new fence line that better protects SIVs and is considerably more consistent with the objects of the CPLA.

This area is the majority of an existing summer grazing block. The existing fence across Obelisk Creek valley, at the 800-900m altitude would become the lower boundary of the area in that basin. The present fence in Butchers Gully lies across the valley at the point where the upper basin tributaries join to create a main stem. At the stream bed, this is at about 700m altitude and at the outer basin rim this is at about 900-950m altitude.

We support the retention of the proposed CA1 area in Crown control as conservation land, as a valuable addition to the Kopuwai Conservation Area, as it contains high significant inherent values (ecological, landscape, recreational) and is unsuited to any form of productive use due to altitude. It also embraces two former recognised areas of value, RAP 1/2 being the summit area above 1300m across both Obelisk and Butchers Creek catchments, and part of RAP 2/3 in the Butchers Creek catchment which starts at around 640m asl and extends to the 1300m contour. The value of the latter RAP is the altitudinal sequence of vegetation from mid altitude shrublands at about 700m altitude up to range crest alpine communities including good tall tussock cover. It is noted that lower down large areas of shrubland have been destroyed by spraying including native grey shrubland. These shrublands include *Olearia lineata*, a species in decline due to spraying and burning, and stock impacts. Coral broom, another species ranked as *Declining* is also present around rock outcrops. It is very susceptible to browsing. The lower part of Rap 2/3 on the Bell and Bow and Top Butchers blocks has been considerably depleted due to this spraying, which we find very disappointing.

The values of reasonably healthy and intact tall tussock grassland – as much visual and landscape character value – from about 700-800m still remain. This is particularly important from Symes Road. where the basin as a whole is highly visible and makes a strong contribution to the experience of the upper range area which is verging on remoteness at this altitude. The attribute of intactness with homogenous cover and absence of visible fence lines is particularly important.

The visual intactness of the tussock basin is also important when viewed from further afield such as from SH8 and the Flat Top Hill area (see attached photo).

We note from the landscape assessment section of the CRR (p 9) : "Visually these mid altitude slopes are significant as part of the range face as a whole. The tussock covered slopes form the context and backdrop to Fruitlands, Alexandra and surrounding area and are a distinctive and iconic feature.

At close range, viewed from Symes Road, the tall tussock and associated large rock outcrops and rubbly schist are distinctive and visually impressive."

Lower altitude snow tussock is becoming increasingly rare as mid altitude areas to around 1000-1100m altitude are developed for grazing with concurrent loss of the tussock. Retention of tall tussock cover is important for water yield, and carbon sequestration. Remaining populations of reasonably healthy tall tussock should be protected and encouraged to regain dense robust cover. This is also the most permanent and effective solution to Hieracium which we note is present here.

It is not ecologically sustainable to continue grazing these high altitude lands, generally above about 900-1100m altitude depending on aspect. Natural soil fertility is low and without any fertiliser inputs to balance those being removed by stock, the nutrients are being inexorably depleted. Tall tussock vegetation is very slow growing. It can be destroyed very easily by over grazing (and burning in the past) but takes decades to recover. Due to altitude and climate, the growing season is also relatively short. Retention of the higher altitude areas as conservation land therefore best promotes Part 24 (a) (i) of the CPLA.

The lower Butchers Creek basin is classified as an Underprotected Land Environment merging into Critically Underprotected land environment. Whilst not a National Priority for Protection, indigenous vegetation and habitats in such areas should be protected to give effect to the New Zealand Biodiversity Strategy.

We note that ecological Significant Inherent Values (SIVs) were identified by the DOC over the entire Butchers Creek basin as well as lower down where there were shrublands. The CPLA Part 24 (b) (ii) requires that SIVs are protected, preferably by Crown ownership as conservation land; or less preferably, by covenant.

We note that a protective covenant overlies similar land on Obelisk Creek adjoining to the north, between the 1300m and 900m contour, with conservation land above. The goals, purpose and conditions of this covenant (prepared some 10 years ago) are particularly sparse however, with no controls over sheep and cattle grazing and topdressing and oversowing is permitted below 1100m. Very little protection is in fact provided. Our branch submitted that all the land above 900-1000m be conservation land, in order to meet ecological sustainability objects of the CPLA and ensure protection of the values.

We do not support the placement of a new boundary fence in the position shown, although we recognise that this is only indicative. This is because it does not provide adequate protection of the identified SIVs as outlined above, by cutting off the lower portion.

The proposed fence has high potential to result in strong visual fragmentation of this currently visually intact and impressive basin. The most noticeable effect would be across the central triangle above the confluence as this is the most widely visible area especially when viewed from below (SH8, Flat Top Hill), as well as from Symes Road. It is considered this would be a significantly adverse impact on the landscape SIVs of the basin.

Visual fragmentation would occur due to increased stock presence and stock camping along the upper margin of the new block, resulting in greener vegetation and loss of native species especially tall tussock, replaced by exotic species which will outcompete the native species. It would also be

expected that the block would be topdressed and oversown. The result will be a highly unnatural sharp visual contrast between the conservation area and the grazed freehold block. It has been observed that this has occurred on other pastoral leases where a new snow fence has been erected across faces at high altitude, and is an adverse outcome identified by the Parliamentary Commissioner for the Environment¹ "*eliminating the appeal of visual unity*".

We note that the proposed line roughly matches the division between landscape units LU1 and LU2. This division however was not intended as a proper landscape unit division (refer the CRR p8) and should not be used as one.

We note that the landscape assessment concluded:

The dominant tall tussock is the most vulnerable attribute of this unit (LU2). The tussock cover is vulnerable to further modification and fragmentation which would have a negative effect on landscape values. Threats to values include:

- Wilding tree spread
- Burning
- Large scale earthworks
- Structures
- Overgrazing or uneven grazing patterns (our emphasis)

The proposed fence line also omits the lowest altitude snow tussock. As this is the rarest snow tussock (due to loss through grazing and burning over most areas), it needs to be protected. The importance of protecting remaining tall tussock and promoting its recovery has been outlined above.

We note that the CRR states at p26: Gradual degradation of tall tussock grasslands is the result of ongoing pastoral use where nutrients removed are greater than those returned by natural processes.

We acknowledge that the warmer more northerly facing land is more able to support on going pastoral use, with responses to fertiliser and oversowing; and we acknowledge this has already occurred on the south side of the basin, where there is more short tussock and matagouri cover. This part is also less visible from Symes Road.

We attach two images and an amended Preliminary Proposal Plan that show where a new boundary fence could go that would much better protect the values and be more consistent with the objects of the CPLA.

A (less desirable) alternative is to create a new upper block between the proposed fence line and the existing fence line - or some new lower fence line - with a conservation covenant placed over it with the purpose of promoting the tall tussock cover and protecting and enhancing the landscape and ecological values. Sheep grazing would need to be limited in season and in stocking rate at the Minister's discretion as long as it benefited the natural values, allowing for tussock flowering and seeding free of sheep browsing (February). There would be no over sowing allowed, but some fertiliser application would be encouraged, to replace lost nutrients and build up fertility to encourage tussock growth and suppression of hieracium. Provisions for monitoring would need to

¹ Pp 47-48 Change in the High country: Environmental Stewardship and Tenure Review, PCE April 2009

be robust, requiring positive trends in ecological health to be shown if grazing is to continue. Monitoring would be at the expense of the land owner.

Proposals for the Flat Top Hill Block

1. Roxburgh Faces to be conservation area CA2.

We support the retention of this area as Crown land managed for conservation purposes. It is classified as a threatened environment (Critially Underprotected and At Risk). There are significant shrub and herb/mat plant species - including Nationally Critical species (mouse tail, *Carex opinata*) - that are extensive enough to encourage regeneration in the absence of stock grazing, and the landscape values are high. It is a large part of the impressive Roxburgh Gorge, an area that will now receive a lot more public use due to the recently completed cycle trail.

The area will be a valuable addition to the existing Flat Top Hill conservation area.

We submit that the existing woody weeds (lupin, pine, gorse and broom) should be largely eradicated by the lessee or at the cost of the lessee before handing over to the DOC.

Comparing this area to the plateau, we note that there is extensive thyme and other exotic plant cover including woody weed species, and we saw very little short tussock (compared to the plateau area) and there is no mention of any ephemeral tarns being present certainly not on the scale of the plateau area, yet the area is deemed worthy of conservation status. Both areas have important but different recreational and visual landscape values.

2. FH2 Area with Area A and Area B

This is an area of some 500ha comprising the plateau top and a part of the western side slopes of this small block fault range. It is characterised by many rock tors of infinitely varied weird and wonderful shapes (due to erosion and weathering) which are highly interesting and being on easy terrain invite exploration and provide superb photographic material. The schist of Flat Top Hill is distinctive for its horizontal form being maintained during uplift – resulting in the broad plateau structures and the amazing tor shapes. The semi-natural dry relatively undeveloped grassland (including native tussock) and native shrubland setting is an important part of the visual qualities. The Obelisk part of Flat Top Hill is considerably wider (around 1km or more) and more plateau like than the northern end in the existing conservation area (where it is some 300-400m wide). The overall plateau or flat topped block mountain structure is better appreciated on Obelisk.

As recorded in the CRR the flat plateau provides good views of the surrounding ranges, and down into the gorge. There is already a form of legal public access through the area in the way of paper roads running the length of the plateau and also connecting to SH8 and to the Clutha River at one point; however they do not necessarily go over easy terrain, nor necessarily follow the most desirable route from "an enjoyment of reviewable land" perspective. The road leading up to the

plateau does not coincide with the formed track. This legal access continues into the existing Flat Top Hill conservation area (where there is wander at will in any case). The Obelisk plateau section is a seamless extension of the existing conservation area, with respect to physical access and landscape character.

It is noted that the landscape assessment considered the options for future agricultural development to be limited due to dry climate, thin soils and extensive rock outcrops. Fire, weed spread and wilding conifers were considered the most obvious threats as well as damage from grazing animals to shrublands. The DOC ecologist also stated that the land class is LUC VII which has limitations for agricultural use, and that the land would benefit from spelling of grazing.

A number of ephemeral tarns are scattered over its surface, a distinctive feature in this semi arid landscape. The semi natural setting is important for their appreciation as natural features too. The tarns support two nationally critical species which are a National 1 Priority for Protection, being classified as a Chronically Threatened land environment where 20% or less of the indigenous vegetation cover remains. Further, tarns themselves are a National Priority level 2 and 3 for protection, being a wetland, and a rare ecosystem. Flat Top Hill is a large part of the driest place in New Zealand, and is thus an important part of New Zealand's full range of natural ecosystems.

There are many patches of mixed native shrublands on Flat Top hill, within gullies and around rock outcrops mainly. Whilst the mix of species is of ecological importance including threatened and uncommon species the shrubland also contributes significantly to the visual and natural heritage appreciation values of the plateau. We also observed some of the species appear to be of considerable age. A total of 11 threatened and uncommon plants species are found on Flat Top Hill.

The tiny wetland plants (in season) and the diverse shrubland with the uncommon *Pimelea aridula* and *Hebe pimelioides subsp. faucicola* and the carrot like *Anistome* are very interesting to study and appreciate for their rarity. The shrublands also support special moth fauna, often specific to particular species such as *Olearia*. The rock tors also support assemblages of lichens and mosses and insects that are particular to them. We observed a wide range of plant types and species around tors – grasses, herbs, ferns, small and large shrubs and scramblers. Clearly each rock tor is a loci for biodiversity, important "biota banks" for future restoration of indigenous biodiversity especially in the threatened environments such as these. The rock tors and shrublands are also essential habitat for skinks and geckos, which were frequently observed on our field trip.

We note that the DOC CRR states that much of the existing tussockland and shrubland has potential for further carbon sequestration. The full potential of lower altitude tussocklands to increase in density and stature and ultimately to succeed to indigenous woody cover, is currently retarded by stock grazing (thus limiting future carbon sequestration).

The CRR mapped the entire Flat Top Hill part of the lease as having significant vegetation and insect values. Map 4.2.4 in Part of the CRR shows a large number of sites of threatened and at risk species throughout the area. There is no doubt this is an area of considerable value.

The proposal for this area is to freehold it, and place a conservation covenant over it (FH2 CC) with two areas A (70ha over the north end) and B (the remainder of 425ha) being created with different management goals. Sheep grazing only is proposed to be permitted in Area A, with no

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topdressing, sowing of seed, direct drilling or cultivation or cattle grazing. All these activities except cultivation would be permitted within the much larger Area B. Area A will be fenced from

It is our submission that:

- 1. Preferably, the Flat Top Hill should be retained by the Crown as conservation land or a reserve,
- 2. or as one area under a conservation covenant with clear robust and effective conditions that will ensure the values are protected and enhanced.

Area B.

Schedule 1 - Values

We agree with what is stated and note that not only are the values to be protected or preserved in accordance with the Objective of the Covenant (clause 2.1) but also <u>enhanced</u> in particular the flora and fauna. We also note that the natural landscape character is to be <u>enhanced</u>.

However the statement of values falls short of the full range of significant inherent values present that require protection. The values stated do not recognise the fact this is one of New Zealand's most extreme ecosystems (the driest) which elevates its value; and that it falls within all 4 National Priorities for protection and is a Chronically Threatened environment. The value of the shrublands and tarns as habitat for a wide array of insects and lizards and the fact some insect species such as moths are associated with particular shrub species (eg, *Olearia*) is also not listed. Tors support special assemblages of lichens, flora and fauna.

Notwithstanding the purpose of the covenant (to protect and enhance natural landscape character) natural character is not included explicitly as a value of landscape amenity, which it is. The tors are the most dramatic component, and the ephemeral wetlands are a distinctive feature but they are elements of a landscape that <u>as a whole</u> has significant value as a natural looking landscape despite grazing modifications, exotic species and tracking and fencing. Relatively, it is undeveloped. This natural character is important as the setting for the tors and the wetlands, to appreciate them as natural features in context. The purpose of the covenant is, correctly, to enhance that natural character. The values also do not include the considerable visual interest (in the rock tors and vegetative diversity, and the ability for impressive views, for example for botanising, nature appreciation, and photography and other graphic arts).

The values also fail to recognise, as stated in the CRR, that Flat Top Hill is also an important site for research on semi-arid vegetation.

It is our submission that the Flat Top Hill area has more than sufficient value to warrant retention by the Crown as conservation land or a reserve, with grazing as a concession. The presence of the ephemeral wetlands alone, with their threatened species, is reason enough for conservation status. These sensitive ecosystems will be vulnerable to adverse impacts of on going pastoral use, particularly if that use intensifies in any way. It is also unlikely there would be much shrubland regeneration with on going grazing.

The presence of cattle in this area is entirely inappropriate. They can destroy wetlands and trample and browse shrubs especially seedlings and saplings.

We understand that some light seasonal sheep grazing can be of benefit to low open turf communities and spring annuals and can be considered an appropriate management tool for these communities, perhaps still at some expense to regenerating shrublands. Thus we would support a grazing concession.

Public conservation land status properly focuses land management on species and ecosystem restoration and enhancement as priority, with associated landscape enhancement, rather than on economic production based on compromise of the natural values and failure to enhance, which is inevitable – the "on balance" approach. The CPLA does not provide for such an approach but requires that SIVs be protected preferably by crown ownership.

Conservation area status would also allow for unfettered public access to explore and appreciate the plateau area with its extensive tors, diverse shrublands and tarn features. The impressive views of the surrounding ranges would also be provided for. This provision would greatly increase the overall recreational value of the Flat Top Hill Conservation area and contribute significantly to the interest and value of the lake Roxburgh trail. If it is freehold, public access is limited to the legal road, a very tenuous "the securing of public access to and enjoyment of reviewable land".

Given the eastern slopes overlooking Lake Roxburgh have, in our opinion, equal and perhaps slightly lower values (eg, lack of extent of ephemeral wetlands, woody weed issues, extensive thyme and obviously more degraded character), we cannot see why the plateau area FH2 is not also proposed for similar status, at least a good portion of it as a consolidation of the values of the existing Flat Top Hill conservation area. The recreational and landscape values are also of such quality to make conservation status worthwhile, greatly enhancing the values and quality of the existing Flat Top Hill CA. The fact the land is of limited pastoral value, being Class VII, in the driest area of New Zealand experiencing harsh winters and being studded with rock tors, also supports public conservation land status. To persist with freeholding on land with such high values albeit with a covenant, is inconsistent with the objects of the CPLA.

Special Conditions

Special Conditions are proposed for Covenant Areas A and B. We have submitted that the Flat Top Hill block should be predominantly public conservation land if the CPLA is to be fully complied with, but if the second best and less preferred option – protective covenant – eventuates then the conditions of the covenant need to be tight and robust to retain focus on protecting and enhancing natural values (flora, wetlands, natural landscape). The conditions proposed are not adequate in our opinion and are marked by inconsistency and tension between purpose and envisaged future permitted uses.

Submission – that the conditions be amended to remove inconsistencies with the CPLA and to ensure that they will effect robust protection and enhancement of the significant inherent values including natural landscape character. Any reference to allowing cattle grazing or oversowing and direct drilling should be removed.

Special Condition 1 – we accept that some sheep grazing may have beneficial effects on the native vegetation in this case, namely the control of exotic species to maintain an open habitat for spring annuals and other small grassland plants. However the timing, type and rate of stocking need to be determined by the Minister, so that the values are assured protection and enhancement. The Minister also needs to retain the right to require cessation.

Special Condition 2 – stocking is only one pastoral practice that can cause damage. Cultivation, fertilizer application, direct drilling and oversowing, and vehicles all have potential to damage and destroy values. The clause needs to read: "the Owner will not stock the Land or carry out any other management activity or land use in such a way as to cause damage to the values (for example by creating a feed pad)."

Special Condition 5 – the Minister needs to retain the right to independently decide on changes to management that are needed, in his/her opinion, to ensure values are protected <u>and enhanced</u>. This does not preclude agreement with the Owner but ensures ultimately decision making is about optimising protection of the values, not optimising pastoral use.

Special Condition 6 – the monitoring also needs to determine if enhancement is occurring (i.e. there are positive trends in species health, ecosystem resilience and robustness and in natural character). If it is not, the purpose of the covenant is not being met and pastoral use needs to be changed, or activity cease.

Special Condition 7 – there is no reason given for distinguishing Area A from Area B with respect to values, in fact Area B probably has the greater weight of values, with numerous wetlands and diverse shrublands and being the larger area with associated landscape values. We do not support the idea of distinguishing the two areas on the basis of management and use – both areas deserve the same level of protection and enhancement, and the management should be consistent over the entire area. We do not agree with the proposition that experiments can be undertaken in an area with clearly identified and vulnerable SIVs including nationally critical values. It is well known that stock grazing, particularly cattle, has adverse impact; and cultivation and direct drilling obliterates any values. Oversowing encouraged by fertiliser also causes exotic species to out compete and replace native species (which is the point of doing it from a farming perspective), but at a somewhat slower rate.

Putting out feed supplements is a way of supporting higher stock numbers, which is anti-thetical to the protection of the values. With light stocking there should be no need for supplements.

Special Conditions 8-12 relate to Area B only. As explained, we do not support having two different areas, as a way of allowing experimentation.

As also previously explained, we submit that under no circumstances should cattle be allowed to graze this area. The presence of the delicate wetlands alone precludes any cattle in this area. Enhancement of shrublands would be unlikely to occur with cattle present either. This clause needs to be deleted.

Special Conditions 10 and 11 in effect permit topdressing of fertiliser, spraying, direct drilling and oversowing. These activities are anti-thetical to protecting short tussock grasslands, shrublands and open turf communities, although some fertiliser application might be beneficial in balancing

nutrients lost with the slow natural release, if sheep are grazed . The natural landscape character would not only <u>not</u> be enhanced, it wouldn't even be protected. These activities all suggest higher stocking rates are intended, the opposite of what should be occurring in this area.

The only spraying we would support is the targeted spraying of weed species – gorse, broom, lupin and wilding trees.

Special Condition 12 – the Minister needs to have the right to approve any dam regarding its location, size and construction and any associated activity such as access for heavy machinery. In giving approval the Minister must be satisfied no natural values – ecological or landscape – will be adversely affected.

Schedule 3 - Management Prescription

Goals – the first goal appears to place <u>equal</u> priority on providing for grazing and on protecting and enhancing the natural values. This goal needs to be completely clear that the protection and enhancement of the values is the sole goal and that any grazing that may occur may only do so if it has furthers the nature conservation goal, and that that is the prime purpose of the grazing (not economic gain).

The second goal assumes a difference exists between Areas A and B validating separate management approaches. There is no valid distinction, in fact it is arguable greater values exist over the much larger Area B (more ephemeral tarns, better short tussock, more extensive shrublands). Area B and Area A should be managed as one in an "undeveloped" state to protect and enhance the natural values, which is the purpose of the covenant.

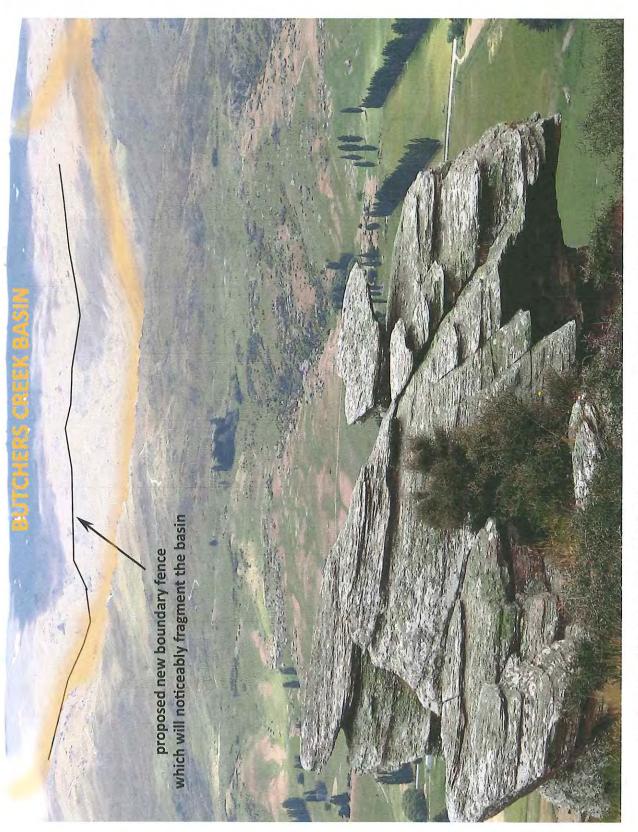
Clause 2.1 - The protection of the amenity and visual values of the landscape involve more than just limiting earthworks and buildings. The prime attribute is the pervasive natural character due to the relatively undeveloped state and predominance of natural elements in particular indigenous vegetation and rock tors. So landscape amenity attributes are to be protected by conditions limiting pastoral use and practices, earthworks and the construction of buildings and other structures.

Clause 2.2.1 – grazing is known to have adverse impacts on indigenous vegetation; so land management practices <u>and</u> pastoral use need to be included in this clause.

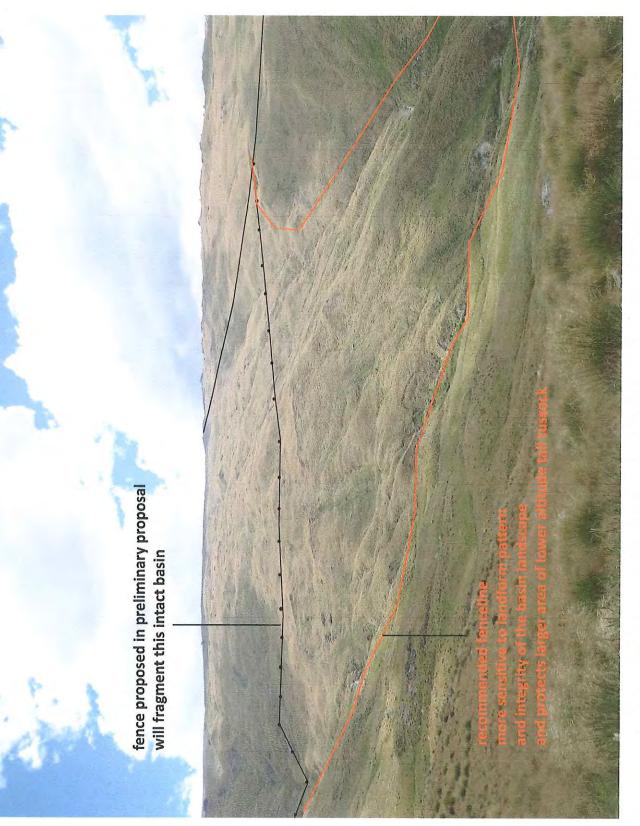
The monitoring of values is as much about ecological state as it is about landscape values.

Clause 2.2.2 - As previously stated cattle grazing is entirely inappropriate in an area with highly valuable and fragile wetlands and with remnant important shrublands. Values would not be maintained let alone enhanced by cattle grazing. We find it disturbing that the threats to what is known to be a highly valuable natural feature are obviously recognised yet the persistence or introduction of this threat is being contemplated.

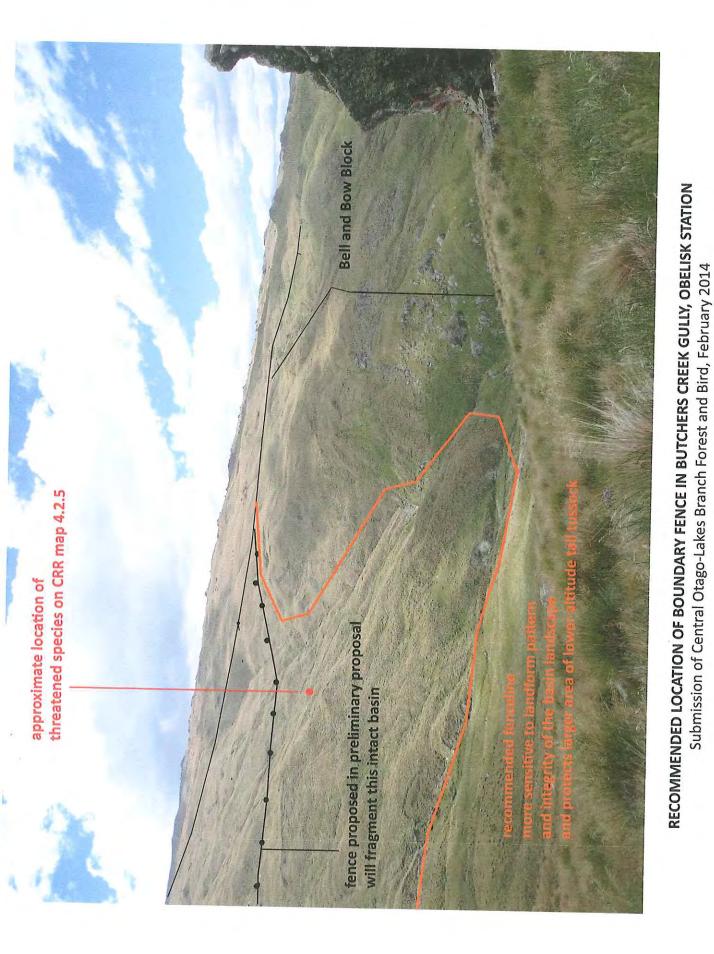
Sheep grazing should only be permitted to the extent it enhances the SIVs at the discretion of the Minister. Positive trends will need to be demonstrated through the monitoring to show this, and continued sheep grazing is only to continue on this basis.

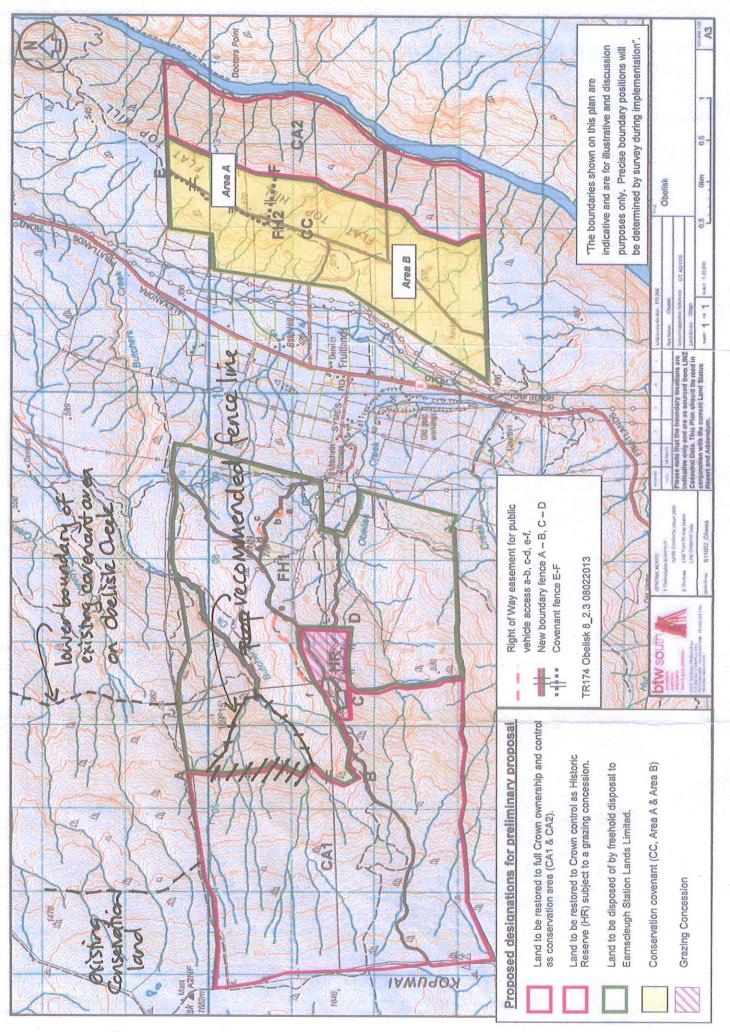


from SH8 and from the Flat Top Hill area. The proposal to bisect the basin with conservation land (top) Butchers Creek basin exhibits a high level of visual coherence and intactness which is appreciated and freehold land (bottom) would significantly compromise this important value. (Photo taken by A Steven Dec 2013, from Flat Top Hill).



RECOMMENDED LOCATION OF BOUNDARY FENCE IN BUTCHERS CREEK GULLY, OBELISK STATION Submission of Central Otago-Lakes Branch Forest and Bird, February 2014





PHOTOS TO ACCOMPANY SUBMISSION OF CENTRAL OTAGO LAKES BRANCH ROYAL FOREST AND BIRD PROTECTION SOCIETY

ON

OBELISK PASTORAL LEASE PROPOSAL FOR TENURE REVIEW

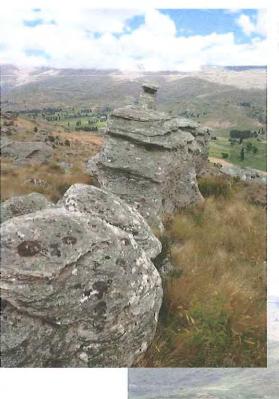
February 2014



Butchers Creek Basin as viewed from Symes Road. This is a landscape of high visual quality, exhibiting a high level of intactness and visual coherence, and a relatively high level of naturalness.



Fascinating weather-sculpted tor of horizontal schist in Flat Top Hill



Infinitely varied and amazing tors of the Flat Top Hill plateau





A large ephemeral wetland with Nationally Endangered plant species within Area B on Flat Top Hill. The naturalness of the surrounding landscape, with a relatively undeveloped character, is important for full appreciation of these rare natural features.



Diverse native shrubland in one of the larger eastern gully heads in Area B. Species include matagouri, Olearia spp, Coprosma spp, Kanuka, Melicytus alpinus, ozothamnus, Spaniards, Tussocks and Ferns



A patch of dense native grey shrubland towards the southern end of Area B.



Two Olearia spp. and two Coprosma spp. in eastern gully head on Area B.



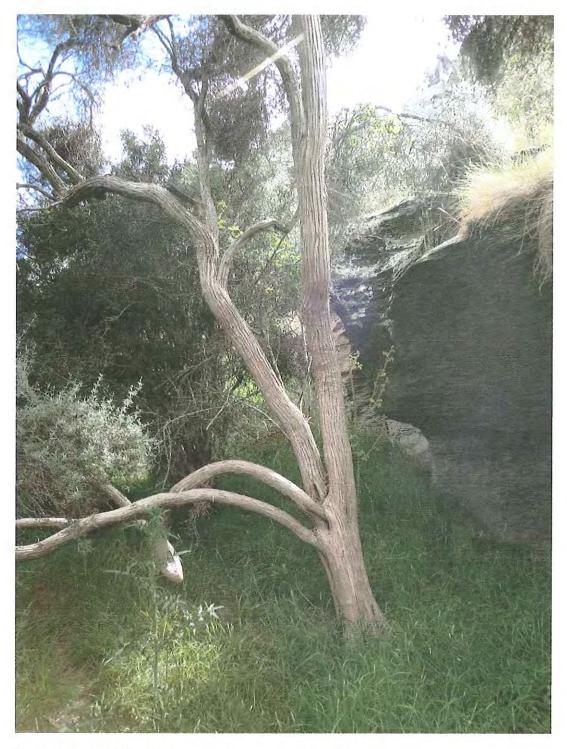
Large old Coprosma spp (right) and large mature native Broom (below) - Area B





A large mature matagouri on Area B.

Anisotome spp are a distinctive and visually appealing herb plant found on a number of the rock tors.



Trunk of a large old Olearia odorata tree in eastern gully head, Area B.

All Photos taken by Anne Steven December 13 2013.