

Crown Pastoral Land Tenure Review

Lease name: REDCLIFFE

Lease number: PC 141

Public Submissions

- Part 4

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

October

05



Received 20/1/06

A SUBMISSION FOR FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND [INC.] ON THE PRELIMINARY PROPOSAL FOR TENURE REVIEW – REDCLIFFE PASTORAL LEASE

Our interest in this Tenure Review

For more than 20 years FMC has campaigned for reformation of the pastoral lease system to allow farming where sustainable, the return of the bulk of the high land to the public estate and for secure public access to that land. We have no doubt that many of the wider public share our vision for the future of the South Island high country.

Land to be returned to full Crown ownership

We are in agreement with the proposals for transfer to full Crown ownership of areas labelled CA1, SR1 and SR2 on the plan under section 35a ii and 35b i.

Land to be transferred to freehold ownership

We do not agree with the proposal to transfer 1355 Ha to freehold ownership under the conditions proposed.

Access to the legal road shown on the plan [but not identified as such] from near point d to the head of Snowy stream would in effect be closed to the public if freeholding occurred without provision for public vehicle access to it. Freeholding as proposed would confer exclusive rights on the freeholder to use this legal road in the conservation area and this is unacceptable. For the avoidance of this problem the public should be given right of access over the track a-b, c-d and to the start of the legal road on foot and by vehicle. Failure to do this would result in the effective closure of a legal road by means of the Tenure Review process and this would be an abuse of that process.

Public access

The present proposal creates two classes of access to CA1.

Those prepared to pay the concessionaire will obviously have easy vehicle access up the track a-b, c=d.

The general public will only have access on foot up marginal strips.

In this way the Department of Conservation obtains a fee [via the concessionaire] for access to conservation land and those who believe that access to conservation land should be without charge must be content with inferior access.

The terms of freeholding and the terms of the concession must be amended to provide public vehicle access over the formed track a-b, c-d and to the legal road.

For Federated Mountain Clubs of New Zealand [Inc.]

G R K Hunter Kalaugher Rd. R.D. 21 Geraldine 20 January 2006

Received 23/1/06

271 Centaurus Rd Christchurch 8002 16 January 2006

Commissioner of Crown Lands c/- Opus International Consultants Ltd PO Box 1482 CHRISTCHURCH

Dear Sir

RE: PRELIMINARY PROPOSAL FOR TENURE REVIEW OF REDCLIFFE PASTORAL LEASE

This submission is presented by the <u>Peninsula Tramping Club (Inc)</u>. We are one of the larger tramping clubs in Christchurch, with approximately 200 members. We organise over 100 tramps every year, of which a large proportion visit high country pastoral leases.

Our club has traditionally made frequent visits to the Redcliffe lease in order to make ascents of the northern end of the Hutt Range, or easier tramps in the Redcliffe Stream catchment to the Redcliffe Saddle area.

We view the area within the lease as a very important recreational resource. The Hutt Range is a Canterbury landmark and is one of the closest and accessible high country areas to Christchurch and Ashburton. The tops provide rewarding moderate to moderate-hard tramping opportunities. The western side of the range includes easier opportunities such as Rat Hill and the scenic Redcliffes Stream area. Therefore it is essential that the tenure review process is used to formalise quality public access into these areas.

We make the following points:

- 1) We are satisfied with the proposed marginal strip on Hutt Stream. This is essential for good access to the eastern side of the Hutt Range.
- 2) We do have concerns over the proposed access into the western side of the Hutt Range. We assume that it is implied that access to this area will be via the proposed Scenic Reserve delineated in SR1. However in several regards, this access does not constitute reasonable public access as required under the Crown Pastoral Lands Act S.24 (c) (i).

We submit the following:

a) The lower boundary of SR1 is almost a kilometre from the Double Hill Run Road. We understand that the only existing legal public access across this stretch of land is up the bed of Redcliffe Stream. The stream bed here is rocky and bouldery and does not constitute reasonable access for most visitors to the Scenic Reserve. We propose that a public access easement along the freehold land directly alongside the stream be negotiated in accordance with the Crown Pastoral Lands Act S.36(3)(b).

- b) The section of Redcliffe Stream that borders the proposed Scenic Reserve is bouldery and difficult, with areas of dense scrub on the banks. In itself it does not constitute reasonable access up the Redcliffe valley since it is suitable only for fit and able walkers, and would be impassable after heavy rain. Additionally, travel up the stream is so slow that it would preclude day-trips on to the Hutt Range, which would be the main purpose of this access route.
 - However we understand that an old farm track well above the true right of Redcliffe Stream, and within the boundary of the proposed Scenic Reserve, will provide adequate access through most of the length of the Reserve. We submit that the boundaries of the Scenic Reserve retain this farm track in the final agreement.
- c) We have doubts about the quality of the access across the southernmost portion of the proposed Scenic Reserve to its junction with the Conservation Area CA1 at point 'd'. The old farm track described in (b) above departs the Scenic Reserve about a kilometre north of point 'd'. Travel within the Scenic Reserve within the final kilometre to point 'd' is difficult. We submit that the best way to ensure reasonable public access from the Scenic Reserve to CA1 is via a new access easement from the Scenic Reserve along the northern side of Rat Hill Stream to meet the legal road that continues up Rat Hill Stream.

Thanking you for the opportunity to make this submission.

Terry Thomsen

Peninsula Tramping Club (Inc.)

New Zealand Deerstalkers' Association Incorporated

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23 January 2006

Commissioner of Crown Lands C/o Tim Broad, Opus International Consultants Ltd Box 1482 Christchurch tim.broad@opus.co.nz

Submission: Redcliffe Tenure Review: Preliminary Proposal

This submission is made on behalf of the New Zealand Deerstalkers' Association Incorporated (NZDA).

NZDA is the national body of recreational deerstalkers and other big game hunters. We have 57 branches and a number of hunting clubs throughout New Zealand. We have 7200 members, and have been actively advocating for deerstalking and recreational hunting, and running deerstalker training courses, trips, conferences etc since 1937. NZDA also maintains the ethical side of hunting by maintaining ethics for hunting, including fair chase, and strongly encouraging harvesting of animals taken.

NZDA notes that Redcliffe was separated from Glenrock PL, and public access and boundary issues arise because they are adjacent. The Glenrock PP has been advertised, and submissions close 28 February 2006. Neither Redcliffe or Glenrock PPs provide any CPLA public access mechanisms (easements), in spite of this being a major object of the CPLA (S 24 (c) (i)). It would be best if these two leases were considered together, because, to some extent, they share common boundary and access issues.

- 1 Summary of NZDA Position Redcliffe: NZDA supports the surrenders proposed. But we are concerned at the lack of any public access easements to the surrendered lands. The purpose of the PP with regard to public access appears to be to make it very difficult for the public to access the surrendered land.
- 1.1 Inadequate Public Access; Include a-b-c-d and other access, etc: The Mt Hutt Range, including the wildlands to be surrendered, are an important actual and potential area for hunting and other outdoor foot recreation. NZDA notes that no specific public access provisions are made in this PP (marginal strips are not a mechanism of tenure review under the CPLA, and do not always provide adequate public access). We are very concerned that the PP ignores public access, because the Conservation Resources Report states public access is an important issue VIZ.

4.4 PUBLIC ACCESS DESIGNATIONS

Several important public access routes to both proposed conservation areas and existing retired land require negotiation on Redcliffe Station. These can be protected by access easements and are recommended:

- 1. From Double Hill Run Road to Hutt Stream catchment reserve This would ensure that the public could gain access to the retired country of Mt Hutt Range
- 2. From Redcliffe Stream paper road to the Rat Hill reserve
- 3. From Swift River, up McLennan Stream to the retired country

None of these access ways are provided for in the PP, via CPLA mechanisms. In fact no easements at all are provided for the public in the PP.

NZDA requests that access easements under the CPL Act be provided for these three important public access ways. The farm track Easement a-b-c-d is more direct and easier than the difficult marginal strips up Redcliffe Stream. This DOC only easement must be a public access easement as well, not just DOC's.

Foot access up the farm track east of Terrible Gully, to point V, is also needed – or the nearby farm track identified in the Christchurch Tramping Club submission. This would allow greater ability for round trips, as well. Without better public access, the Tourism concession is being made exclusive to the owner of the freehold, by inadequate provision of public access over that freehold.

NZDA expects that there will be chamois and red deer on parts of the surrendered land. They are there at present, and they will be present in future, given the area is within the wild range of both species.

- **1.2 Vehicular Access for Recreational Hunters**: NZDA's Code of Ethics requires that, normally animals taken should "endeavour to make full use of the game taken." Ability to use a vehicle for taking carcasses out would significantly increase hunting pressure. We ask that this be allowed, as a management purpose when a hunting permit is issued to shoot on this surrendered land, and adjacent public land. This would allow hunters with permits to access a-b, c-d to the high surrendered land.
- **1.3 Outstanding mountain landscape, and Amenity Value**: The eastern side of the lease is visible from the Rakaia Valley and is certainly a nationally outstanding landscape. As well the proposed surrendered land will provide viewpoints from which the land, and the Upper Rakaia Basin can be viewed. It has high amenity value as a result. All the surrendered land has high value for extensive recreation, including big game hunting, tramping, walking etc
- **1.4 Tourist concession should not include land deemed to have been surrendered in 1986**: NZDA is surprised that 4950 Ha of land that should have been surrendered from this lease ie more than half the lease area, was not surrendered in 1986. We note, that as this area has been deemed to have been surrendered, and is therefore deemed to be Conservation land, and not part of this tenure review, it should not be subject to the tourism concession that is part of this tenure review.

However, we see that it has been wrongly included (Tourism concession Schedule 1, Item 1 Land = 7,724 Ha). Only (7,724-4950) = 2,774 Ha should be in the Tourism concession. Also, nowhere in the PP is the area deemed to have been surrendered actually shown. If this area was truly not part of the TR, then it should have been completely excluded, and shown as a separate public Conservation Area. The lessee is getting a second bite at the cherry.

- 2 Redcliffe Preliminary Proposal: (4,252 Ha once the non surrendered land is subtracted.)
 2.1 Surrendered to scenic reserve SR1 (109 Ha); SR2 (4 Ha)
- **2.2 Surrendered to Conservation Area** 7,724 Ha, (2,774 Ha if take off the 4,940 Ha that should have been surrendered), subject to a 10 year recreation concession for guided hunting & tramping. Rises to Mt Hutt (2,185 m) and north end of the Mt Hutt Range, Mt Bruce (1,829 m), Mt Hecla (1,734 m), Steepface Hill (1,876 m). Includes 4,950 Ha of land notionally surrendered in 1986, which was not legally surrendered. Also noted a covenant at Cookies Flat, that was never set aside.
- 2.3 Freeholded 1,355 Ha of the 9,192 Ha minus the 4950 Ha that was not surrendered in 1986, when it should have been ie 4,242 Ha. Easement for DOC (a-b, c-d), none for the public, who

have to use a marginal strips up either Redcliffe Stream (North west) or Hutt Stream (east). New fencing required along the eastern side of the freehold.

No public access provided via the CPLA.

3 NZDA Interests - Redcliffe Recreational Value:

Deerstalking and hunting of deer, tahr, chamois etc is likely.

NZDA branches in this area that would/could hunt on the surrendered land include: Ashburton Branch, Malvern, North Canterbury, North Otago, Otago, Palmerston, Rakaia, South Canterbury, Southern Lakes (Queenstown/Wanaka/Cromwell). Ashburton Branch has a hut at Lake Clearwater (Chamois Lodge), built because of the big game animals available in the Mt Hutt area.

Other branches further away, or from the North Island also visit the area.

Tahr and deer hunting in this area would attract regional interest. Returning the proposed areas to full Crown ownership and management will provide hunters with the ability to hunt these areas, because they will become public park land.

NZDA is disappointed the CRR has almost nothing about actual or potential recreational use. The area is within 80 minutes drive of Christchurch, and provides some of the highest peaks so close to the City.

4 Conclusion - Redcliffe:

4.1 Inadequate Public Access: It is essential better public access be provided, for example, as set out above. Adequate public foot and vehicle access is needed to the proposed surrenderted land from the east., north, west, and south.

The present lack of reasonable public access is counter to the requirements of the Crown Pastoral Lands Act (CPLA). It includes in its objectives

"The securing of public access to and enjoyment of reviewable land"

In many tenure reviews, only limited access is provided which does not meet these objectives. The mechanisms provided for in the Act for public access are limited to (S 2 "protective mechanisms" – (a) Easements under S 12 of the Reserves Act; S 7 (2) of the Conservation Act; or S 8 of the Walkways Act. All of these three mechanisms are for ordinary people, not super fit or super experienced outdoors experts.

Consequently the CPLA is clear that access provided should be suitable for optimum public use bearing in mind that the land in question is often rugged. The Department of Conservation (DOC) is responsible for reporting to Land Information New Zealand (LINZ), which administers pastoral leases, about public values including recreation and access. DOC's own manual for tenure review states:

"All areas to be restored to Crown ownership as conservation area or reserve should have legal, practical and reasonably convenient public access secured where it does not exist at present".

This is manifestly not occurring in this PP. Access is inconveniently located along flood prone and steep/rugged marginal strips, or unreachable legal roads. There is better access available via farm tracks on easier ground. On Redcliffe no CPLA access is provided where a minimum of two routes are needed for "recreational enjoyment" (such as round trips) and mountain safety reasons. The public access proposals in this PP are unacceptable, and must be revised to meet adequate standards, eg as proposed above.

4.2 Surrendered Land Unsuitable for sustainable use: NZDA strongly agrees that the land proposed for surrender is unsuitable for sustained production, and should be surrendered. It also has high actual and potential value for hunting and other outdoor recreation activities.

Thanking you

Yours truly

Dr Hugh Barr National Advocate

Royal Forest and Bird Protection Society PO Box 2516 Christchurch Mail Centre Ph 03 3666 317 Fax 03 365 0788

23 January 2006

Tim Broad **Opus Consultants** PO Box 1482 Christchurch By email tim.broad@opus.co.nz

Dear Tim Broad

SUBMISSION ON PRELIMINARY TENURE REVIEW PROPOSAL FOR REDCLIFFE PASTORAL LEASE, RAKAIA VALLEY

1. 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 submission is on behalf of the Society's Central Office and Canterbury/West Coast regional 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."

2. PRELIMINARY PROPOSAL

Forest and Bird understands the preliminary proposal (PP) to involve:

- 1. Restoration to or retention in full Crown ownership and control as scenic reserve:
- (SR1) 109 ha on the true right of Redcliffe Stream.
- (SR2) 4 ha close to the mouth of Hutt Stream on the Double Hill Run Road.
- 2. Restoration to or retained in Crown control as conservation area approx. 7,724 ha comprising:
- CA1 Waterfall Creek/North branch Ashburton River, Swift River, and Hutt Stream catchments.
- Subject to a 10 year concession for guided hunting and tramping.

3. Freeholding to the holders, WH and SH Ensor, of 1355 ha.

3. SUMMARY OF SUBMISSION

The preliminary proposal is generally supported because of the high natural and landscape values of the proposed conservation lands and scenic reserves, the inappropriateness of continued grazing and the extent of Class VII and VIII land.

Concerns include:

- Failure to provide adequate practical access to Redcliffe Saddle.
- Need for access up Terrible Gully.
- Inadequate access up Hutt Stream.
- Need to extend CA1 to include more of Hutt Stream and unnamed stream and gully to the south.
- The failure to comply with s39 Crown Pastoral Land Act and provide information describing proposed concession activities and their effects.

4. SPECIFIC CONCERNS

4.1 Inadequate access to Redcliffe Saddle, Swift River and Rat Hill

The proposal to provide for public access via a marginal strip up Redcliffe Stream does not provide adequate or secure public access to the proposed new conservation land. The marginal strip does not extend to Double Hill Run Road. While current holders have been generous with access, future ones may not be and could effectively block public access to a large area of conservation land by denying across the freehold block (Pt 32344 SO 2817) between the marginal strip and the public road.

Accordingly, the preliminary proposal does not comply with section 24(c) of the Crown Pastoral Land Act because it does not provide secure public access to enable public enjoyment of a large area of reviewable land.

There is no certainty that alternative public access to the upper Swift River and Black Hill will be provided via the farm track on neighbouring Glenrock, so this should not be a factor in decisions on Redcliffe.

Further, the dense matagouri dominated shrublands on the stream banks and the rocky bed, and reasonable flow in Redcliffe Stream would make travel up the streambed slow. The access is impractical. (See Photo 1 below). Requiring DoC to cut a track through the shrublands would cause unnecessary damage to conservation values and would not solve the absence of access at the northern end of the marginal strip.

The proposed Designations Report (16.8.05)¹ provided for a public access easement from Double Hill Run Road east across a paddock of currently freehold land, onto the pastoral lease and along a 4WD track to Jack's Stream and Redcliffe Saddle. The easement would have affected 1 ha (1 km x 10 m) of freehold land. The holders' objections (which are not supported by any solid reasons) appear to the reason the public access easement proposal

¹ Designations Report at section 2.2.2 p 6 and 2.5.2 p8.

has been dropped. The Designation Report proposal would provide more practical and secure access for trampers, walkers and mountain-bikers than the preliminary proposal..

The importance of such access has long been recognised. The Commissioner of Crown Lands also recommended that public foot access to the Swift River along the 4WD track occur when the lease was renewed² but again the holders' objections appear to have prevented this.

Trampers, walkers and other back country users generally respect private property and structures. The risk of their damaging the holder's power scheme is low or non existent, particularly given the power scheme's distance from any urban area or road. Private structures e.g. telecommunications aerials and associated structures, skifield lifts are regularly maintained on public land without being vandalised or damaged. A philosophical objection to public access and exaggerated claims of possible damage are and unreasonable and inadequate basis for not providing secure or practical access.

The consultation notes suggest that slips and other damage require regular maintenance to the farm access track "a-b" and "c-d" proposed for vehicle access for management purposes. The notes suggest that the Department of Conservation is likely to contribute to bulldozing and other track maintenance costs. If public money is used to maintain the track, public foot and bicycle access should be allowed as of right. It is an improper use of public money to do otherwise.

Decision sought

Provide an access easement for public foot and bicycle access from the Double Hill Run Road east across a paddock of currently freehold land, onto the pastoral lease and along a 4WD track to Jack's Stream and Redcliffe Saddle i.e. along easement route "a-b" and "c-d" on Preliminary Proposal Map 1.

4.2 Access up Terrible Gully

The visibility and landscape prominence of the Rakaia faces make them an attractive day walking and tramping destination. Steepface Hill is a popular day trip which is likely to become more so once the area is public land. Providing foot access up the farm track to the east of Terrible Gully would allow walkers to do a round trip involving Hutt Stream. The Conservation Resources Report inadequately describes current recreational use and values of the area and appears to have ignored information provided at NGO early warning meetings and subsequently by recreational groups. DoC has also failed to make any inquiries of groups such as Forest and Bird or tramping clubs of their current or likely future use of the area.

Decision sought

Provide an access easement for public foot access up the Terrible Gully farm track from the Double Hill Road to conservation land.

4.3 Guided hunting and tramping concession

Section 39 Crown Pastoral Lands Act (CPLA) requires a preliminary proposal to include a description of each proposed concession activity, places where it is to occur to be

² DoC (June 2005) Conservation Resources Report at p16.

identified and the potential effects to be assessed. From documents provided under the Official Information Act this has not been done and the preliminary proposal does not comply with the Act.

The Department of Conservation and LINZ's continued disregard for the Act in relation to concession activities in recent preliminary proposals (e.g. Mesopotamia and now Redcliffe) is a serious concern. If effects are not assessed, they cannot be avoided, remedied or mitigated as the Conservation Act requires.

The Submission and Drafting Instructions report incorrectly notes that, "There are no concessions associated with this tenure review therefore the Director-General of Conservation is not required to comment or provide further information to comply with section 39 of the Crown Pastoral Land Act 1998."

No information is provided on whether aircraft or 4WD vehicles are to be used to transport hunters or trampers, the number of vehicle trips and the impacts of this on the new conservation land and other users.

Condition 7 of Schedule 2 Special Conditions of Appendix 3 to the Preliminary Proposal notes that "The Concessionaire and their clients shall remain on formed tracks or well used routes where these facilities have been designed to protect the natural and historic features of the land at all times."

The drafting of the condition means it is unclear whether the Concessionaire has to use the farm track which was presumably built to improve access to the back of the lease, rather than to protect natural and historic features. The clumsy drafting means the condition does not restrict vehicles to existing tracks.

Aircraft use would have major impacts on natural quiet and the enjoyment of other users.

Forest and Bird objects to a commercial concession being granted over such a large area of conservation land which the public does not have practical or secure access to. It also objects to the concession including 4950 ha. of land which was supposed to be surrendered in 1991. The holders have inappropriately benefited from the lack of follow through by government agencies. The surrender area should be excluded from the concession.

Decision sought

Renotify preliminary proposal with an appropriate description and assessment of concession's effects and other information required by s39 CPLA.

Amend condition 7 of Schedule 2 to read: "The Concessionaire and their clients shall only use vehicles on formed tracks designed for vehicle use. No off road vehicle use shall be permitted."

Add new clause to condition 10, Protection of the Environment.

³ Opus, (21 November 2001) *Redcliffe Station Submission and Drafting Instruction*–Phase 3 Standard 8, Report CH0103.

"(i) maintain using machinery any existing vehicle or other tracks on the land."

Include new clause prohibiting use of aircraft by Concessionaire for concession activities.

4.4 Hutt Stream

The Conservation Resources Report notes that Hutt Stream has a high diversity of habitats and communities and "is the only sub-catchment of the Rakaia valley on the property to have both strong altitudinal and aspect gradients reflected in the vegetation." It notes that the broad leaved snow tussock grasslands in the catchment are "of excellent condition, density and stature" and that the sub-alpine communities are largely natural.⁴

The Preliminary Proposal does not adequately protect these values or implement section 24(b) of the CPLA because the proposed conservation land boundary is 100 metres or more higher up the slope than recommended in DoC's Recommendations and Values map for Hutt Stream. The conservation land boundary is also several hundred metres higher than recommended in the unnamed stream to the south of Hutt Stream. The CRR had specifically identified the shrublands in this area as deserving protection.

Decision sought

Move freehold-conservation land boundary down slope in both Hutt Stream and the unnamed stream to the south, to protect full extent of vegetation communities recommended for protection by DoC.

4.5 Hutt Stream access inadequate

The preliminary proposal map shows the marginal strip up Hutt Stream not extending to meet the conservation land. The Consultation file notes suggest that the holders wanted a continuous freehold link to new freehold land above Cleardale. This again means that public access is not secure, contrary to s24 CPLA. Present or future landholders could prohibit the public from crossing this narrow strip of proposed freehold land to access Steepface Hill and the rest of the Hutt Range.

Decision sought

Move the boundary of CA1 down slope so that the Hutt Stream marginal strip extends to the boundary (favoured option).

Alternatively, provide for a public access easement across the proposed freehold from the south western end of the Hutt Stream marginal strip to connect with CA1.

Forest and Bird would like to be advised when a decision has been made on the Preliminary Proposal submissions.

Yours sincerely

Eugenie Sage Regional field officer

⁴ DoC (June 2005) Conservation Resources Report at p14-15.

Attachment – Photo 1 Redcliffe Stream

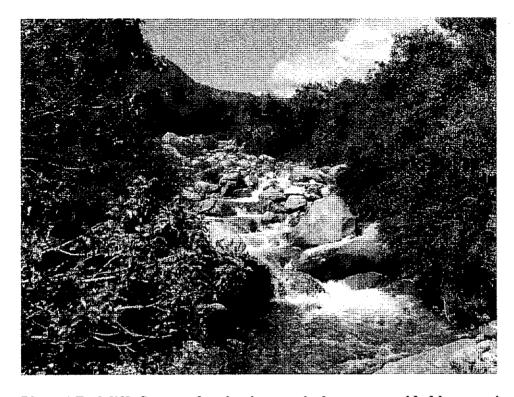


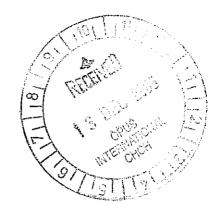
Photo 1 Redcliffe Stream showing impractical access provided by marginal strip. Photo- David Henson.

JULONRESERSED UNDER THE OFFICIAL INFORMATION ACT

10 Smacks Close Papanui Christchurch 8005 10 November 2005

Opus International

Re: Redcliffe Tenure Review



Dear Sir

Unfortunately this review in my opinion reflects poorly on whoever carried it out. I've been travelling up to L.Coleridge for forty odd years and have seen little improvement in vegetation on these properties on the south side of the Rakaia river over that time. The land should be taken out of grazing to protect it from erosion and not for any other reason. From what I can see there is or is about to be another major slip on that hill and this review favours continual grazing!

I can see little justification for any grazing above the road which accesses the upper Rakaia, including for the property next door, also up for review.

It is just sad and depressing to see this continual destruction of the land, how anyone can say with any pride that they own this land and farm it, beats me!

Further, in SR1 why don't you follow the natural contours of the hillside and extend the boundaries up the stream (jack stream) and along either the escarpment or vegetation line as shown on the map.

This is not a plea for conservation land but just a request to protect the soil.

Yours

Georg Clark



Te Rünanga o NGĀI TAHU

Level 6, 158 Hereford Street Te Waipounamu House PO Box 13-046, Christchurch Phone: 03 366 4344

Fax: 03 365 4424

21 July 2006

Mike Todd Opus International Consultants Ltd PO Box 1482 Christchurch

Tēnā koe Mike

Preliminary Proposal for Redcliffe Pastoral Lease

Thank you for forwarding us the Preliminary Proposal for the abovementioned Tenure Review property.

Upon review of the Cultural Values Report Te Rūnanga o Ngāi Tahu and Te Rūnanga o Arowhenua are satisfied that the values identified have been appropriately integrated into this proposal.

Nāhaku noa, nā

Takerei Norton

Environmental Advisor

Te Rūnanga o Ngāi Tahu

cc Te Rūnanga o Arowhenua Mandy Waaka Homes