

Crown Pastoral Land Tenure Review

Lease name : RIBBONWOOD

Lease number : PO 247

Public Submissions

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

These submissions are released under the Official Information Act 1982.

Submission 1

26 October 2011

Luana Pentecost
Property Administrator
Darroch Limited
P O Box 27
Alexandra 9340



Dear Luana

Review Under Part 2 Crown Pastoral Land Act : Ribbonwood

Thank you for providing copies of a summary of the proposed designations, the notice and proposal document.

Unfortunately, as a result of council prioritising its work programme for this financial year, we are no longer in a position to provide information to the tenure review programme. However, this doesn't preclude you from making a formal request, in writing, to access specific resource information held on file.

The Council will continue to meet its obligation to the programme in terms of any legal interests (such as a Land Improvement Agreement pursuant to Section 30A of the Soil Conservation and Rivers Control Act 1941) it holds over Crown leasehold land.

We have no legal interest in Ribbonwood under a Land Improvement Agreement.

If you have any queries please don't hesitate to give me a call on my direct line (03) 687 7848.

Yours faithfully



Neil MacDonal
Senior Planning Officer

cc: Cathie Brumley
Environment Canterbury

Submission 2



Our Ref: 22015-001
Your Ref: Po247/1

14 December 2011

The Manager
DTZ New Zealand Ltd
PO Box 27
ALEXANDRA 9340



Attn.: Luana Pentecost

Dear Ms Pentecost

RE: RIBBONWOOD PASTORAL LEASE TENURE REVIEW

Thank you for your letter of 30 September 2011 concerning the above. The NZHPT's Southern Regional Office in Christchurch forwarded this on to my office for a response. I acknowledge that the period for comment has now lapsed, however I would like to submit the following comments which may be useful in consideration of this case.

The NZHPT is New Zealand's lead agency in historic heritage management. It is an autonomous Crown Entity established under the Crown Entities Act 2004. Its purpose is to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand, as provided for in Section 4(1) of the Historic Places Act 1993. Section 54(2)(a) of the Act empowers the NZHPT to advocate its interests at any public forum or in any statutory planning process. This includes High Country tenure reviews undertaken pursuant to Part 2 of the Crown Pastoral Land Act 1998.

We have reviewed the Summary of Preliminary Proposal, October 2011 and the Conservation Resources Report on the LINZ website. We are aware that the lease was investigated for tenure review purposes around 2002, although it seems that only a desk top assessment of historic values may have been done for Ribbonwood.

There is no reference in either the Summary of Preliminary Proposal or Conservation Resources Report to an archaeological assessment having been undertaken for Ribbonwood Station. Our own assessment confirms that;

1. this lease came about through the breakup of the huge Benmore Station in 1916, hence the survey maps referred to below which resulted from this break-up.
2. NZAA site record form G39/5 from 1990 shows a Maori site (Moa Hunter) recorded just over the property boundary on the other side of the Ahuriri River. This is a significant site which indicates there is evidence of pre-contact Maori activity in this area.
3. The Maori site is recorded on a terrace also occupied by a hut, so the other hut sites on the river flats on the property require site checking to establish if any other evidence remains.
4. SO 247 from 1916 shows the old fence lines, gates, pack track and trigs.
5. SO 251 shows an 'Old Hut' on the southern boundary of the lease at the top of Ribbonwood Creek, this may date from the Benmore Station days.
6. The inch/mile maps from 1969 show two water races on the eastern side of the lease coming from the East Ahuriri Branch and two hut sites, and a water race on

the western side of the lease coming out of Last Diadem Creek. These may date from a lot earlier and have been associated with early irrigation attempts.

NZHPT believes that in view of the number of heritage values on Ribbonwood Station, these need to be more thoroughly investigated in order to properly inform this preliminary proposal. This property should have further heritage research done and a field investigation undertaken, particularly with respect to the need to check for evidence of other Maori activity in the vicinity of G39/5. That would enable proper consideration and assessment of appropriate levels of protection for all historic heritage values on Ribbonwood.

The NZHPT should be forwarded a copy of any such assessment once completed and requested to confirm its satisfaction or otherwise with the methodology used and recommendations made. Both the assessment's recommendations and comments by the NZHPT then need to be properly considered by the Crown before agreeing to any substantive proposal with the lessee.

It is important for the Crown to note that most of the above-mentioned sites of historic heritage significance are on land proposed for disposal to the lessee. The Crown has an obligation to both the lessee and the public to properly inform itself of significant inherent values on Ribbonwood Station, and guarantee their appropriate protection, as part of this tenure review. It is clear that in this instance, the investigation of historic heritage values has been very limited.

Please let me know if you have any queries with respect to the above.

Yours sincerely



Owen Graham
Area Manager (Otago/Southland)

Submission 3

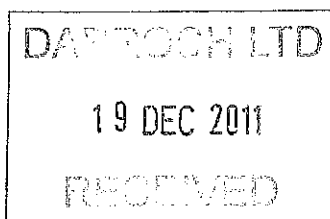


Department of Botany

University of Otago
Te Whare Wananga o Otago

Division of Sciences
PO Box 56, Dunedin
NEW ZEALAND

Tel: National 03 479 7573 International 64 3 479 7573
Fax: National 03 479 7583 International 64 3 479 7583
Email: amark@otago.ac.nz



Manager,
Darroch Ltd.,
PO Box 27,
ALEXANDRA

December 15, 2011.

**SUBMISSION ON THE PRELIMINARY PROPOSAL FOR TENURE REVIEW:
RIBBONWOOD 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 general knowledge of the vegetation and pastoral leases in the Ahuriri Valley.

The preliminary proposal for this 7289ha property appears to have some deficiencies in terms of the relatively high elevation and degraded condition of some areas proposed for freeholding and the overall balance between area of ~2200 ha (30%) proposed for restoration to full Crown ownership and control as three separate Conservation Areas (CA1 of 1770ha., CA2 of 20ha. and CA3 of 410ha) on the crest and slopes of the Diadem Range. The balance of some 5090ha (70%) has been designated as land proposed for freehold disposal but subject to a qualified designation and a protective mechanism.

Regarding the detail of this proposal, the areas designated as CA1 and CA3 (not CA2 as in the description of The Diadem Range in S 2.1, para 2 of the proposal), I note, are contiguous and form the central southern part of the property, being the multi-domed Diadem Range around its highest area, rising to 1734 m on 'aptly named' Snowy Top. This is the source of several streams radiating from the summit, most notably Ribbonwood Creek and West Diadem Creek which feed into the Ahuriri River, East Branch. The Quail Burn and East Diadem Creek and their several tributaries all flow generally to the east into Serpentine Creek which joins the main Ahuriri River near the homestead. **The Diadem Range is therefore an important source of water** for the Ahuriri River which is important both within this section as well as a significant tributary of the lower Waitaki River where water is now recognised as a major natural resource. Conservative management of the vegetation on these upper slopes, where most of the water is sourced, would be consistent with maximising the water yield, based on recent research by myself and others.

The Diadem Range saddles with the Ohau Range on a low saddle to the north. This saddle provides important, relatively easy access from the Ohau Basin into the mid and upper Ahuriri Valley, which is an important feature.

The **altitudinal sequence of indigenous vegetation** within the proposed **Conservation Areas CA1 and CA3**, are an important feature, grading from short (*Fescue novae-zelandiae*) tussock with an exotic component including hawkweeds (*Hieracium* spp.) on the lower slopes at 800-900m, through narrow-leaved snow tussock (*Chionochloa rigida*) grassland with co-dominant shrubs in the gullies, then on to slim snow tussock (*C. macra*) grassland, and then a mosaic of cushionfield, scree

and coarse boulderfields on slopes above ~1400m on most of the upper slopes and extensive boulderfields and screes at higher altitudes. The condition of this vegetation and the associated environment is such that it is most unlikely to be able to sustain pastoral farming. Indeed, this area was retired many years ago under a Soil and Water Conservation Run Plan because it was considered unsuitable for pastoral farming. The case for separating the CA3 block from the adjacent and larger CA1, on the basis of its potentially serious wilding tree problem (up to 1400m) is **accepted**, as is the commitment to eradicate this problem in the shorter term with wilding removal (which now seems to be eminently feasible with the new 'basal stem application' method), whereupon the two areas, totalling 2180ha, would be treated as one conservation area for management purposes.

The third **Conservation Area, CA2**, although a relatively small (20ha) area of copper tussock (*C. rubra* ssp. *cuprea*) grassland, it would probably remain viable given its location, a proposed fence (S-T) on its southern boundary, and its contiguity with existing conservation land on its other borders. This aspect of the proposal is **endorsed**.

Of the ~5090ha proposed for **freeholding**, the recommended **Conservation Covenant (CC1)** of ~90ha (~2.0 x 0.5km), at the confluence of the Ahuriri River East Branch and Ribbonwood Stream, is an important indigenous bird and native fish habitat, involving some threatened species, would appear to justify transfer to full Crown control and enclosure fencing (apparently it is now almost, and will become, fully fenced), but the case is made for continued farming activities which are assumed not to be in conflict with the indigenous habitat values. Exclusion of stock during the bird breeding season, as specified, will be essential. In the relevant Schedule 2, however, the permitted stocking rate (for sheep only), at other times has not been specified, and although **monitoring of both vegetation and fauna** is indicated, methods have not been specified. Also, there is a condition that the Minister may require "any necessary steps" to be taken to further protect a faunal species or the "ecological condition" of the covenant, including additional fencing and "adjusting stock access". This all sounds fine but will be **dependant on adequacy of the monitoring** which **should therefore be clearly specified** in this proposal. I **recommend** that full Crown ownership and control should remain an option, subject to the Minister's discretion as to the outcome of clearly specified monitoring of both fauna and habitat.

Regarding the **other areas proposed for freeholding**, the case is made for existing fences being retained as the permanent boundary between conservation and freehold land on all aspect slopes of the Diadem Range even though these fences, in most areas, would allow grazing and pastoral farming to continue on land up to ~1600m, "considered non sustainable due to sparseness and a very long recovery time after grazing." Moreover, much of the land above 100m is classified as Land Use Capability Classes VIII and VIIe, indicating it is unsuitable for pastoral farming. As stated in the proposal, most of the land above 900m has landscape and botanical attributes, with the implication that grazing is "very minimal if any" and that it cannot sustain normal pastoral farming. This being the case, an additional condition should be added and is **strongly recommended**: that no management burning be permitted above 800-900m, and if a fire accidentally extends above 850m there should be no grazing of stock for a minimum of two full seasons. Such a condition would help ensure that the boundary between the freehold and conservation lands remain diffuse, as recommended in the proposal. I am very concerned with some of the rationale offered in defence of the term "ecologically sustainable" in S.3 of the proposal, and clearly used to justify continued stock grazing well above 1000m (the usually accepted limit for sustainable management in this region). The statement that "in some cases their land can sustain a low level of extensive grazing due to natural ecology" is particularly woolly and, whatever it means, it is certainly not able to justify the concession made in this proposal for continued grazing to well above the 1000m norm. Given the highly vulnerable condition of most of the land above 900-1000m I **strongly recommend** that a more appropriate resolution be negotiated to ensure no grazing of stock be permitted above ~1000m and that a retirement fence be negotiated on a suitable alignment (an existing 4WD track apparently already

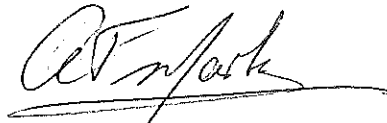
exists at about this elevation on the western slopes below Snowy Top, which should provide a feasible fence), and all land above this altitude be transferred to full Crown ownership and control. Alternatively, on the northeastern slopes below the proposed CA1-CA3, where no feasible fence line may be present, I would **recommend** that ecologically sustainable management could be more readily achieved with the designation of a “**Sustainable Management Covenant**” (provided for in S. 97, Pt 4 of the Crown Pastoral Land Act, and as has been used previously to deal with such situations: tenure review of Lake Hawea P.L.) on all land down to 900-1000m, and managed accordingly.

The six “qualified designations” specified in the proposal for public foot, mountain bike and horse access, are **accepted**, including the specified limitation on the **easement** “a-b-c” from 1 Nov. – 20 Dec. associated with lambing.

Regarding the ~60ha of established Douglas fir plantation at the foot of the Diadem Range, the **requirement** that “normal farm weed control” be exercised so as to “contain any conifer spread” is **endorsed**.

I thank you for the opportunity to comment on this proposal and I request that my comments and recommendations be seriously considered in finalising this proposal.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A F Mark', with a long horizontal flourish extending to the right.

Alan F. Mark. FRSNZ. Emeritus Professor.

Submission 4

Royal Forest and Bird Protection Society of New Zealand Incorporated.

Central Otago-Lakes Branch

Denise Bruns – Secretary
4 Stonebrook Drive
WANAKA 9305

19th December 2011

The Commissioner of Crown Lands
C/o Darroch Ltd
PO Box 27
ALEXANDRA



Dear Sir

Ribbonwood Po247– Tenure Review Preliminary Proposal.

We thank you for sending us a copy of this proposal and we appreciate this opportunity to comment on it. We carried out an inspection of the property on 12th December 2011 and would like to take this opportunity to thank the lessee for allowing us to do so.

Our branch of Forest and Bird is fully conversant with the tenure review process under the CPL Act 1998. While the branch is centred on Central Otago and the three Lakes, Wakatipu, Wanaka and Hawea which flow into the Clutha River. For logistic purposes the branch also assists with making submissions on properties draining into the Waitaki River in the southern end of the Mckenzie country.

1.0 We note:

- Ribbonwood occupies the bulk of the Diadem Range which is separated from the Ohau Range to the north by the low Quailburn Saddle. It has many creeks rising from its highest point, Snowy Top 1734m, which flow either west into the Ahuriri River or east into Serpentine Creek to join the Ahuriri River lower down.
- On our climb up from the homestead to False Diadem the lower slopes appeared devoid of tussock due to development but it came in to evidence at about 1000m, but went to a slightly lower level on the south, or dark, side of the ridge.
- Where the lower slopes in the Quailburn Block have been oversown and topdressed, much white clover was in evidence on the northern faces
- The land on the west side below Snowy Top, the Ahuriri Side, is eroded down to about 1000m and is mainly LUC Class VIIe with Class VIII land above about 1200m
- The Conservation Resources Reports describe the significant inherent values on Ribbonwood in a more detailed manner than we can.

- Some of the long scree runs and boulder fields present must not be confused with man-made erosion; they were there long before pastoral farming started in New Zealand but they are a reminder that in hind-sight, and of what we know now, that the certain parts of the country such as this country which is prone to scree runs, should never have been farmed in the first place.

2.0 Land to be returned to full Crown ownership and Control “CA1”, “CA2” and “CA3”:

“CA1” The Diadem Range (1770 Ha)

Apart from a narrow corridor above the Quailburn Saddle, which allows for farm access between the two ends of the property, this area extends right across the property from south to north and takes in the high tops; False Diadem 1727 m, Diadem 1680 m and Snowy Top 1734 m. and also the headwaters of Ribbonwood Creek. We fully agree that this area be returned to the Crown for protection as it takes in the very high and exposed boulder and fell fields also all the other significant values as described in the Conservation Resources Report. However the fences erected on the east and west sides of this block of land were erected under a Soil and Water Conservation Run Plan, which would be under the umbrella of the Waitaki Catchment Commission, and are far too high to use if they are to meet the main requirement and aim of the CPLAct 1998, Part 2, (a) (i) to “.....*Promote the management of reviewable land in a way that is ecologically sustainable*” and (b) “*To enable the protection of the significant inherent values of reviewable land*” – (i) “*By the creation of protective mechanisms; or preferably* (ii) *By the restoration of the land to full Crown ownership and control.....*”.

As the land below the present below the existing retirement fences down to about 1000m is in parts eroded, and is characterised by LUC Class VIIe, and Class VIII land, and therefore considered uneconomic to fertilise to replace the nutrients taken off in the shape of meat and wool it will be unsuitable to graze as it will not be ecologically sustainable, as required by the Act, therefore the north east and the western fences will have to be relocated in parts down to a lower level at about 1000m, or in the case of the north east side new fences erected on a lower contour in probably four or five blocks.

The present fence on the west side is 1500m at its highest point. This is extremely high and allows sheep to graze some badly eroded country in places, which would be very undesirable. To say that sheep will not climb high is far from correct; sheep will invariably climb high just as they will always head into the wind, it is a natural instinct.

The proposal expresses the opinion that fencing will affect the continuity of the landscape. This can be so with sheep creating camps below a fence on the crest of spurs or high corners which create green patches with the increase in fertility at these points. It should be noted however in respect to the landscape, that the tracking on this west side of Snowy Top is already very visible, more so than the present fencing.

A good and unobtrusive line for this western side fence would be to start where the present fence coming from the north drops into West Diadem Creek, just below where the track starts up the hill to Snowy Top, and then head south on or about the 900m contour to meet the present track coming out of Ribbonwood Creek and follow that into, either above or below the track into Ribbonwood Creek.

The fence on the north east side of CA1, also CA3 is also high, 1500m where the track [c] – [b] enters the proposed CA1. However the east boundary of Ribbonwood (the east side of CA1) south of spot height .1393 is boundary to conservation land already arrived at through the review of Bendhu, so too is part of CA3

CA1 has a boundary with the Bluff Block. To protect the significant values contained in this block also the Quailburn and the Hogget Block further along the spur, new fences should be erected across these blocks on or about the 1000m contour. So too on the south side of the same ridge fences should also be erected on a similar contour through the Race Block and the Gully Block. Doing this will help in meeting the requirement of the Act.

If an acceptable fence line cannot be found to meet these requirements then perhaps the alternative would be to place a Sustainable Management Covenant, Part 4 CPLAct Section 97 of the Act, over all that land above 1000m to the north east of the proposed boundary between CA1 and CA3 and the blocks to the north east, but is not the “*preferred*” method. Such an alternative would require strict monitoring forever and a day and would by no means be as effective in protecting the values present .

CA3 East Diadem Creek (410 Ha)

There is little difference between this block and CA1 with respect to the significant inherent values they contain except that the erosion in this block is probably greater than in CA1. An attempt was made some 40 years ago to control this erosion by planting it in trees, conifers. While most of these trees have managed to survive it is doubtful if they have fulfilled their objective. The land on which they are planted is classified as LUC Class VIII.

We fully support the proposal that this block be returned to the Crown for protection, it is high and eroded and is therefore ecologically unsustainable. The conifers will have to be removed, not merely contained. With the methods that have become available recently, such as aerial spraying and the basal treatment of trees, there is every chance of success.

CA2 Red Tussock remnant (20 Ha)

We see this as a good move and a gain for conservation. Becoming destocked the tussock has every chance of recovering. It will be a living museum and a very good reference point for future scientists. However to be effective as a show piece, the public must have walking access to it. Walking access could be provided from (a) to [T]

3.0 Approximately 5090 Ha to be disposed of by freehold disposal to the holder under Section 35 (3) of the Act subject to a qualified designation and a protective mechanism:

As intimated above in 2.0 above we do not agree to the proposal that such a large proportion of the higher land should become freehold as this. We consider all the land above about 1000m contains many significant inherent values, and altitudinal sequences of these; as referred to in the Conservation Resources Reports. The tussock is thin and open and any grazing is upon the inter tussock species, the tussock providing a micro-climate for these species to survive. As just one example, *Carmichaelia* is present and very palatable to stock and is invariably grazed hard to the point of extinction.

The new fencing we recommend can be constructed without detriment to the landscape providing that it is constructed without the use of a bulldozed line – it is not impossible. The risk of snow damage to fencing is ever present in the McKenzie country. Repairing fences is part of farming throughout the hill country of the South Island of New Zealand.

Ribbonwood as with all other properties in the McKenzie basin will have a snow cap for about four months of the year. It is the slow melting of the snow in the spring and early summer together with the snow tussock's attributes to hold water on this high ground which provides the water for the many streams radiating from the property.

The fact that oversowing and topdressing of the country above 1000m is not evident, although has no doubt been tried, is an indicator that the land cannot be managed in an ecological manner, therefore the present fences as described in the proposal are not suitable for the purposes of the Act.

4.0 A Qualified designation under Section 36(3)(b) of the Act. An easement in gross to provide for foot, mountain bike and horse access, and conservation management access:

We support these although they could be improved on, or better clarified; there is no track to point (a), we have to presume you get there from the Quailburn Saddle road. We accept the condition that there should be a closed period for lambing from 1st November to 20th December. Such a late date for lambing emphasises the late spring and consequently the short growing season for this part of the world, which will in turn have an effect on the overall ecology of this hill country under discussion.

5.0 CC1 Ahuriri River East Branch - A Protective Mechanism over (90 Ha) under Section 49(1)(b) and 40(2)(a) of the Act:

This area takes in the small braided stream, the East branch of the Ahuriri River, which is extremely important for bird life in the area, we fully endorse it. We at the same time, considering the importance of the area to the ten bird species present including, four on the nationally critical, nationally vulnerable or nationally endangered lists to be too small for this purpose. We note in the proposal, 2.3.2, 2nd paragraph, that this area was initially considered for returning full Crown ownership and control but it was considered that 90 stock units per

annum outside the bird breeding season would help keep weeds from encroaching on the braided river system but we are unable to comment on this as the weeds in question are unnamed, which is unfortunate, but at the same time important because at the time the birds are breeding so too are the weeds starting to grow again.

The Covenant - SCHEDULE 2 Special Conditions

Clause 1 The covenant area is to be remained fenced at all times – We **approve** of this.

Clause 2 While we cannot comment on the proposed stock numbers but **approve** that no sheep be allowed to graze the area between 15th September and 14th January the following year to facilitate the management of the birds in their nesting and breeding habits.

Clause 3 **Approve.**

Clause 4 We **disagree** with the statement that the Minister “**may**” it should read the Minister “**shall**” design and undertake a monitoring programme. **Agree** with sub clauses a. and b.

Clause 5 **Approve.**

6.0 In Conclusion:

There would be a good outcome for this proposal if all that land above 1000m were to be returned to Crown ownership and protection – again promoting ecological sustainability is the main function of the Act. Grazing land above 1000m will not achieve this.

We thank you for the opportunity to comment and await with interest the outcome of this proposal.

Yours faithfully,

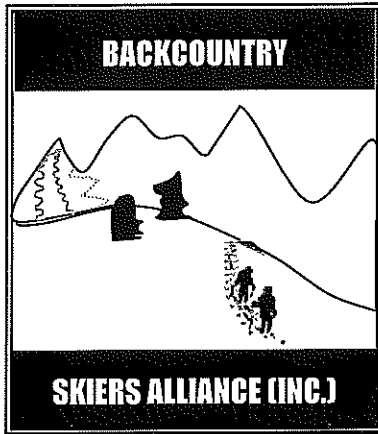
p.p. JL Turnbull



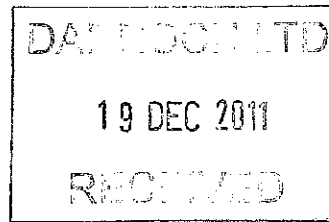
for Denise Bruns

Secretary – Central Otago Lakes Branch

Submission 5



Backcountry Skiers Alliance
PO Box 168
Alexandra



10 December 2011

Darroch Ltd
Box 27
Alexandra 9340

Submission on Po247, Ribbonwood Station

Thank you for the opportunity to submit on the proposed tenure review for Ribbonwood.

BSA

Backcountry Skiers Alliance (BSA) is an incorporated Society established in 1996. Our objectives are to foster non-motorised winter recreation in backcountry areas, and to promote and protect the resources upon which our member activities are based. During other times of the year our members are involved with a variety of land-based activities including mountain biking, tramping and horse trekking. BSA has submitted on a wide range of land tenure and environmental matters throughout the South Island. For many members BSA is the only outdoor organization they belong to.

East Ahuriri to Quailburn MTB Route

Our main grumble with the current proposal would be the loss of the wonderful opportunity to link the Ahuriri Valley to the Ohau Basin using the excellent track along the NW foot of the Diadem Range. The track is proposed freehold, with no public easement along it, yet it grazes CA1 in more than one place, passes between CA1 and CA2, plus has two public easements across it.

This track would make an excellent Mountain Bike (MTB) route, traversing the foot of the Diadem from the south on a formed surface with a reasonable gradient most of the way to just above the Quailburn.

In addition, this track will provide the only apparent practical MTB access from the south to the steeper "a-b-c" easement and hence to the tops of CA1 and CA3. This then enables the possibility of a round trip (for walkers and fit bikers) continuing over the summit of the range and back to Ribbonwood Creek.

We recommend that an easement for foot and MTB be established along the most practical route using existing track(s) where possible. This would start from a car park at about "e" to

join airstrip at the southern end of the 4WD track. The easement would only continue to "a" with no further public access required along the remaining track to the station.

A viable route already exists to the Quailburn from "a". This descends the spur NE of "a" through sparse scrub before joining a rough stock track to the historic shearing shed and yards below. The route could easily be improved further at a later stage.

There is no other practical alternative MTB route between the two valleys. The easement "e" to "f" is fine for foot access into the Ahuriri, but the east branch valley lends itself for tramping and not for biking. The tussock and spaniard-covered saddle and surrounds are unrideable, as is the route up the Quailburn to the saddle.

Linking the Ahuriri to the other excellent MTB routes north in the Ohau basin makes very good sense. Other routes exist from the south into the Ahuriri, for example from the Lindis and out via Ben Avon, just a few km up the Ahuriri Valley Road.

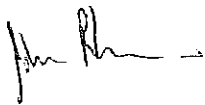
The easily-accessible McKenzie foothill country, with extensive pastoral modifications such as exotic plantations, airstrips, and existing 4WD tracks lends itself more to mountain biking than tramping. Mountain biking is already a popular form of recreation. It continues to grow at a fast rate.

We feel it is very important to establish routes such as that proposed above. Each route adds to the network of tracks and allows the possibility of long trips through interesting country without the need to cycle on busy main roads.

Conservation Areas

We support the creation of Conservation Areas and Covenants, and the additional access easements proposed.

Yours Sincerely



John Robinson
Secretary, BSA

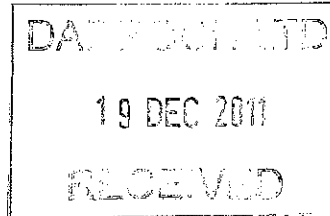
Submission 6

NORTH OTAGO TRAMPING AND MOUNTAINEERING CLUB

PO Box 217

Oamaru 9444

Commissioner of Crown Lands
C/o Darroch Ltd
PO Box 27
Alexandra 9340



19 December 2011

REVIEW UNDER PART 2 CROWN PASTORAL LAND ACT: RIBBONWOOD

The North Otago Tramping and Mountaineering Club exists to promote understanding and enjoyment of the natural environment through tramping and mountain climbing. The Club supports the main thrust of the preliminary proposal for tenure review of the Ribbonwood Pastoral Lease, which it sees as consistent with the Club's objectives.

The Ribbonwood lease runs from a block on the east side of the Quailburn Road, taking in the Diadem Range, to the Ahuriri River in the west. The northern boundary cuts across the Quailburn Saddle and then follows the East Ahuriri. The southern boundary follows the Ribbonwood Stream from the Ahuriri and then over to the East Diadem Creek which flows into the Quailburn.

The preliminary proposal is for:

1 2200 ha in three blocks to become Conservation Areas. The biggest blocks (1770ha and 410ha) take in the bulk of the Diadem Range, rising from around 900m to the tops at 1700-odd m. The northern side of the Diadem Range seems particularly worthy of protection, but at least some of it has already been retired from grazing under a Run Plan. The remainder of it appears to be of mixed value, some in exotic grassland mixes and other parts dominated by *Hieracium*. The 410 ha block above the East Diadem is particularly problematic in that it suffers from wilding pines deriving from soil conservation measures taken some 40 years ago. The proposal argues that it should be conserved as part of the Diadem Range and states enigmatically "To this end there is to be co-operation between the agencies and the holder to remove the trees to enable designation as conservation land". The third (20 ha) block is a red tussock remnant on the Ohau-East Ahuriri Saddle.

2 5090 ha to be freeholded. The western block includes developed flats running from the Ahuriri River and easy downs rising to steeper slopes on the Diadem Range bounded by an existing stock fence. On the eastern side, the land drops away through tussock hill country to easy downs and developed flats across the Quailburn Road. A proposed covenant on 90ha at the confluence of the East Ahuriri and Ribbonwood streams will protect a noted area for bird life. Limited grazing will be available outside the bird breeding season to assist weed control.

3 Four easements providing non-motorised public access from the Quailburn Road in the east and Irelands Road in the south to the Diadem Range area, the Ruataniwha

Conservation Park and the Ohau Range. The last two areas are frequently tramped by Club members and ensuring access would be valuable.

The Club fully supports the broad objects of the preliminary proposal. The main question to us is the technique used to protect the Diadem Range. The broad landscape values certainly deserve to be protected, but the quality of native vegetation seems to be pretty variable - generally not high - and some land is already protected under a Run Plan. Removal of wilding pines is essential in our view to protect the landscape values, but the proposal is so woolly in allocating responsibility for this as to be meaningless. An alternative approach might be to freehold the Diadem blocks with covenants to protect existing native vegetation, require clearance of wilding pines and provide for foot access. We are not sufficiently aware of the historical responsibilities for the establishment of these trees to suggest how clearance costs might be allocated among the parties, but that could be negotiated. The main thing would be ensure that there is clear and unequivocal responsibility for ensuring the clearance takes place. The rest of the proposal seems sensible.

Yours sincerely

John Chetwin
Vice-President

Submission 7



FEDERATED MOUNTAIN CLUBS OF NEW ZEALAND (Inc.)
P.O. Box 1604, Wellington.

19 December 2011

The Commissioner of Crown Lands
C/-Darroch Ltd.
PO Box 27
ALEXANDRA



Dear Sir,

Re: Preliminary Proposal for Tenure Review: Ribbonwood Pastoral Lease (Po 247)

I write on behalf of Federated Mountain Clubs of NZ Inc. (FMC) which represents over 11,000 members of tramping, mountaineering, climbing and other outdoor clubs throughout New Zealand. We also indirectly represent the interests and concerns of many thousands of private individuals who may not currently be members of clubs but who enjoy recreation in the back country.

On their behalf, FMC aims to enhance recreation opportunities, to protect natural values, especially landscape and vegetation, as well as historic values and to improve public access to the back country through the tenure review process.

FMC fully supports the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the Clark (Labour-led) government's stated objectives for the South Island high country especially the following:-

- ** to promote the management of the Crown's high country in a way that is ecologically sustainable.*
- ** to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.*
- ** to secure public access to and enjoyment of high country land.*
- *to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy.*

[EDC Min (03) 5/3; CAB Min (03) 11/5 refer]

* Note that regardless of the changes of government and of governments' policies, these objectives are still the law of the land as enshrined in the Crown Pastoral Land Act, 1998.

We recognize that additional objectives (introduced by the Clark Labour-led government) have been reviewed and modified by the current (National-led) government, and will no doubt be reviewed again by the 2011 Key (National-led) government, but we still believe they are fundamental to the future well-being of the South Island high country and should be given appropriate weight in the tenure review process.

FMC appreciates this opportunity to comment on the Preliminary Proposal for the review of Ribbonwood Pastoral Lease.

THE PRELIMINARY PROPOSAL

Description of proposed designations:

2.1 Approximately 2200 hectares to be restored to full Crown ownership and control as conservation area under section 35(2)(a)(i) Crown Pastoral Land Act 1998 (labelled “CA1” (1770 Ha), “CA2” (20 Ha) and “CA3” (410 Ha) on the plan).

2.3 Approximately 5090 hectares to be designated as land to be disposed of by freehold disposal to the Holder under section 35(3) Crown Pastoral Land Act 1998, subject to a qualified designation and a protective mechanism.

Qualified Designation

2.3.1 Qualified designation under section 36(3)(b) Crown Pastoral Land Act 1998. An easement in gross to provide for public foot, mountain bike and horse access and conservation management access (shown as a dashed orange line and marked “a-b-c”, “e-f”, “e-g”, “h-i” and in the case of “d-b” and “d-j” (conservation management only) on the plan).

Protective Mechanism

2.3.2 Protective mechanism under Sections 40(1)(b) and 40(2)(a) Crown Pastoral Land Act (identified as CC1 on the plan).

Introduction and Submissions

A Report entitled “*Ribbonwood Station – Field Survey and Assessment of Recreational and Related Significant Inherent Values*” was prepared by FMC in April 1999. This included recommendations for the designation of a new Conservation Area, easements for recreational use of the property and the freeholding of areas capable of supporting ecologically sustainable pastoral use. The Report included an 8 point Summary of Conclusions and 6 Figures illustrating the main issues discussed in the Report. This older report is attached as an Appendix to this submission which considers the earlier (1999) FMC recommendations and the new proposals included in the Preliminary Proposal (PP) for the tenure Review of Ribbonwood (2011).

In this submission we present our views and recommendations in the same format as the PP quoted above. In this submission we concentrate on the similarities and differences between the FMC 1999 recommendations and the current PP.

2.1 Approximately 2200 hectares to be restored to full Crown ownership and control as conservation area under section 35(2)(a)(i) Crown Pastoral Land Act 1998 (labelled “CA1” (1770 Ha), “CA2” (20 Ha) and “CA3” (410 Ha) on the plan).

FMC is delighted to note that the combined areas of CA1 and CA3 (totalling 2180ha) correspond very closely with the area recommended by FMC in 1999 to be returned to the Crown as Conservation Area. This area, which spreads north and south from the crest of the Diadem Range, includes the high points – Snowy Top (1734m), Diadem (1680m), False Diadem (1727m) and the land with the highest natural and recreation values. The multi-domed Diadem range is the gathering ground for creeks flowing in all directions from the Summit ridge. Taking these creeks in a clockwise sequence, Ribbonwood Creek, West Diadem Creek and a family of un-named little creeks (flowing north off the range) flow into the East

Branch of the Ahuriri River, while the Quail Burn, and East Diadem Creek, with its many tributaries on the eastern flanks of the range all flow into Serpentine Creek, before joining the main stem of the Ahuriri River near the Riverside homestead.

The Diadem range is therefore an important contributor to water harvesting in the Ahuriri catchment, and its contribution to the entire Waitaki catchment with its significance with regard to hydro power generation, irrigation and general water use.

We note that the proposal document provides a description of the natural values of the scree and boulder fields on the rounded tops, and the Cushion vegetation covering part of the upper ridges. We also note that there is a topographic sequence of vegetation which includes tall tussock grassland, and exotic grassland where grazing has been intense.

Significant inherent values include shrublands on the shady faces of both Ribbonwood and East Diadem Creeks. The natural values of the (now retired) steep northern faces of the Diadem Range are also described.

We agree that the faces and gullies around the Diadem Range provide important vegetation transects through various zones between about 1,000 and 1,700m with aspects representing all points of the compass. As such the range provides an unusually comprehensive range of ecological communities and habitats for comparison and study. The scientific value of this natural outdoor laboratory is high.

We appreciate that the track around the foot of the northern slopes is necessary for farm management connecting the proposed freehold areas to the east and west of the Diadem Range. Similarly we accept that the strip of land between that track and the property boundary has been greatly modified from its original condition.

FMC is aware of the problems in the upper catchment of East Diadem Creek where soil conservation pine plantings some 40 years ago are emerging as a serious problem. In its earlier stages this was recognised in the FMC Report on Ribbonwood (1999) where it was recommended that tree removal should be undertaken. *"These trees should be removed by the Crown to restore the landscape values and to eliminate the potential threat of unwanted wilding spread"*.

We are pleased to note that to deal with the problem *"Active management will continue to be required to contain or eliminate the spread of trees as part of ongoing management by the DCG but once cleared re-emergence will diminish over time and the land take a character indistinguishable from the balance land in CA1."* New techniques for dealing with wilding pines should make this task easier.

FMC considers that it is appropriate to recognise the significant inherent value of a small area of remnant red tussock in the saddle between the Ohau Basin and the Ahuriri Valley, and that this area (20ha) should be designated Conservation Area CA2. With guidance from botanical specialists, enlargement of this area should be considered.

FMC Submission

FMC endorses and fully supports the designation of approximately 2,200 ha of land to be restored to Crown ownership and control as Conservation Areas CA1, CA2 and CA3. We are particularly pleased that the recommendation made in the FMC (1999) Report that some 1,500ha of Ribbonwood pastoral lease on the Diadem Range should be returned to full Crown ownership has now come to fruition. This new conservation land will be appreciated for its intrinsic natural

values, its recreational and scientific values and its significant contribution to water harvesting in the Ahuriri/Waitaki catchment. It is recommended that an enlargement of Conservation Area CA2 be considered.

2.3 Approximately 5,090 hectares to be designated as land to be disposed of by freehold disposal to the Holder under section 35(3) Crown Pastoral Land Act 1998 subject to a qualified designation and a protective mechanism.

Philosophical background to “Sustainable Management”

Consideration of Ecologically Sustainability is important in relation to assessing what land is suitable for freehold disposal because Object (a)(i) of the CPL Act is *“to promote the management of reviewable land in a way that is ecologically sustainable”*. However, the term “ecologically sustainable” is not defined in the CPL Act 1998.

We note that in this Proposal there is an interpretation of “Ecologically Sustainable”: It is interpreted to mean:- *“The relationship of living organisms and their environment where outputs from the land (or water) are in balance with the inputs whether natural or artificial whereby there is little or no changes to the state in which the living organisms and their environment was found at any given point in time.”*

In discussing the proposed designations in relation to the objects of the CPL Act 1998 the proposal document states that: *“There is generally reservation about the ability of land above 1,000m to sustain ongoing grazing in many circumstances and particularly in the absence of inputs it could be regarded as not “ecologically sustainable”. This can be exacerbated by the low return from physical inputs onto such land.”* FMC fully agrees with this statement.

We are puzzled by the statement that: *“However this perception need not always be true, as in some cases the land can sustain a low level of extensive grazing due to natural ecology”*. We are not sure what “natural ecology” means in this context but it seems to us that if removal of nutrients (eg. P and S) in animal products is not in balance with inputs (whether natural or artificial) the system will eventually be depleted, become unsustainable and will collapse.

In this case it has previously been recognised that the areas identified as CA1 and CA3 cannot sustain ongoing grazing. They were retired from grazing under Soil and Water Conservation Plans (Run Plans) in the 1960s and 1970s.

The Review goes on to say: *“Elsewhere, particularly on the Ahuriri Faces of the Diadem Range some stock that may drift to relatively high altitudes should be sustainable as they will be at low stocking levels”*. This is an example of where the general principle of nutrient balance has been deliberately distorted in favour of continued productive use. We argue that continued grazing and nutrient removal (even at a low level) is simply postponing the inevitable depletion and ecosystem collapse.

In discussing the proposed designations in relation to the objects of the CPL Act 1998 the review document states that: *“It is our belief that the overall tenure review proposal as outlined is structured to enable [our emphasis] managers; “To promote the management of reviewable land in a way that is ecologically sustainable”*.

FMC asserts that this is **nonsense** because management of one parcel of land in a way that is unsustainable cannot be compensated for by more ‘sympathetic’ management on another, separate parcel of land. Put simply: lax grazing or generous application nutrients on one block of land will never compensate for over-

grazing or depletion of nutrients on another block of land, even if it is on the same farm. The sums may add up over the whole farm, but there will be some areas where depletion will occur and where the ecosystem will not be ecologically sustainable.

Consideration of the proposed designation for freeholding

The FMC Report (1999) on Ribbonwood described “*quite extensive areas of paddocks on the flats adjacent to both the Ahuriri River and Serpentine Creek. These areas of the most useful farmland are not totally separated by the Diadem Range because there is a good access road which keeps below about 1,000m and follows the East Branch of the Ahuriri River, and traverses the hill slopes above and to the south of the former Quailburn woolshed*” We described some 1,800ha of Land Use Capability (LUC) Class III, IV and VI land (commonly Yellow Brown Earth Pukaki soils) on the flats and fans in the vicinity of the Ahuriri River in the west and near the homestead in the east. These lands are considered suitable for freehold disposal.

Between the areas of paddocks and flats described above, and the sub-alpine areas in CA1 and CA3, there is some 5,000ha of land which, with increasing altitude, has increasing limitations for pastoral production and decreasing probability that it can be managed in a way that promotes ecological sustainability. Only some of that land is therefore suitable for freeholding. The boundary between the proposed Conservation and freehold areas ranges from rather less than 900m in the valleys of the Ahuriri East Branch, and Ribbonwood Creek to 1,600m on the crest of the Diadem Range near Snowy Top. We submit that a significant part of this area (between about 1100m and 1600m) has too many limitations on pastoral production, and is classified LUC Class VIII or Class VIIe, defined unsuitable or marginal for pastoral use, and so cannot be managed in a way that is ecologically sustainable.

The PP is not easy to understand where it discusses the boundary between CA1 and the proposed freehold land. It is particularly difficult with regard to the existing fencelines and their altitude fluctuations. The PP states that:- “*Practical reasons suggest the current fence [from Point ‘f’ at 850m in Ribbonwood Creek going north, then east, then south to Point ‘j’ at 850m in East Diadem Creek] becomes the new boundary*”. Between these two points the fence shown on the plan climbs to 1600m, drops to about 1,000m where it crosses West Diadem Creek, and climbs again to 1,400m before dropping again to 900m on the Ribbonwood-Ahuriri track. The northern section of the fenceline (roughly parallel to the track, undulates between 900m and 1,250m before turning south and climbing again to 1,500m on the crest of the Diadem Range. The fence shown on the plan finally runs down a spur to the East Diadem Creek at Point ‘j’.

The PP next states that: “*most of the area, above about 900m altitude up to the [retirement] fence, consists of tall tussock grassland identified for both its landscape values and botanical attributes with various shrub plants distributed throughout. However, in reality very minimal, if any grazing occurs through the upper levels while allowing stock to have access to the easier lower country and for the same practical reason the current retirement fence was erected on its present line as a safe and practical fence line. It has therefore been taken as the logical line for the tenure review boundary*”. We initially considered this, together with the case for preservation of landscape values, to be a reasonable argument for utilising the existing fences as the new boundary.

Following field inspection, and consideration of LUC maps we are now convinced that parts of the proposed boundary are much too high. It would seem that the sole reason for using existing fences is the cost saving of not having to build new fences.

We believe that more suitable fencelines within the altitude range of 900 to 1,100m could be found in most instances. We strongly recommend that the choice of fencelines should be revisited to exclude from the proposed freehold area, all Kaikoura Steepland High Country Yellow Brown Earth soils above about 1100m which have been classified LUC Class VIII and VIIe. Our main reason for making this recommendation is that we do not believe such soils can support pastoral use, and will not promote ecologically sustainable land use as required by the CPL Act.

The eastern slopes of the Diadem Range include tussock covered hill country grading into easy downs and flats. There are extensive areas of modified and improved grasslands extending beyond the Quail Burn into the Ohau basin. The higher country is characterised by Kaikoura Steepland (LUC Class VIIe) High Country Yellow Brown Earth soils, while there are areas of LUC Class VI Omarama Yellow Grey Earth soils at mid altitude on the sunny face. Around the fringe of the Ohau basin there are Dalgety (LUC Class VI) Yellow Brown Earth soils with Ohau outwash soils on the floor of the Ohau basin east of Serpentine Creek

With regard to that part of this land which extends up to 1,500m on the Diadem Range, similar considerations with regard to the freehold/Conservation Area boundary apply as above. All Kaikoura Steepland Class VIII and VIIe land above about 1,100m should be excluded from the proposed freehold area and instead added to the proposed Conservation areas CA1 and CA3. The remaining land below about 1100m, commonly Omarama Yellow Grey Earth soils (classified LUC Class VI) which characterise these lower slopes appear to be suitable for freehold disposal.

Also included are blocks of Douglas Fir forestry plantations and numerous shelter belts. We note that continued management will be required as part of normal farm weed control to contain any conifer spread.

FMC Submission

FMC is not opposed to the designation of some of the 5,090 ha as land to be disposed of by freehold disposal. For reasons elaborated above, we argue that the boundary between proposed Conservation and freehold land is much too high because most of the land above about 1100m cannot be managed in a way that promotes ecologically sustainable land use. This land should be excluded from that proposed for freehold disposal by relocating the dividing fenceline within the altitude range 900 to 1100m. We note that some 90ha of land near the confluence of Ribbonwood Creek and the Ahuriri River is proposed for protection under a Conservation Covenant. FMC endorses this proposed Covenant.

Qualified Designation

2.3.1 Qualified designation under section 36(3)(b) Crown Pastoral Land Act 1998. An easement in gross to provide for public foot, mountain bike and horse access and conservation management access (shown as a dashed orange line) and marked “a-b-c”, “e-f”, “e-g”, “h-i” and in the case of “d-b” and “d-j” (conservation management only) on the plan.

FMC appreciates that the proposed easements “a-b-c”, “e-f” and “e-g” and “h-i” will provide interesting and challenging new recreational routes for public enjoyment. We fully support and endorse these proposals. It is however, unclear to us how members of the public will be able to gain legal access to point “a” and on the Ribbonwood boundary in the vicinity of Quailburn.

It needs to be clearly established that the public will be able to use the Ribbonwood farm track to Point “a” or alternatively what access is proposed from the former Quailburn woolshed (on public conservation land) to Point “a”.

FMC Submission

FMC strongly supports the proposal to create easements which will provide new access routes over Ribbonwood. These will be particularly valuable for recreation on the Diadem Range and in the Ahuriri Valley. We are particularly concerned that it will be made clear how members of the public will be able to gain legal access to Point "a" on the boundary of Ribbonwood.

Protective Mechanism

2.3.2 Protective mechanism under Sections 40(1)(b) and 40(2)(a) Crown Pastoral Land Act (identified as CC1 on the plan).

We understand that the proposed covenant over an area of approximately 90 hectares is at the confluence of Ribbonwood Creek and the Ahuriri River which extends about 1km northward. It is an area of typical upland stream character noted as most important for birdlife.

We also understand that while the area was initially proposed for full Crown ownership and control, continued access for sheep grazing outside of the critical breeding season for birds will assist in keeping weeds from encroaching on the braided river system valued for the birds. This appears to be acceptable so long as grazing does not exceed 90 SU on an annual basis, and all grazing is excluded during the avian breeding season.


FMC notes that the proposed covenant area is located near to the Ahuriri River. On consideration, we agree that a covenant will provide supplementary bird feeding grounds and contribute to the overall value of this valley but does not require total Crown ownership to provide that function. We believe that it is important that the terms and conditions of the Covenant provide for monitoring of the ongoing condition of the vegetation and that if adverse effects are recorded there should be provision to reduce stocking to a lower level, while continuing to exclude all stock during the avian breeding season.

FMC Submission

FMC supports the proposal to designate a Conservation Covenant over an area of about 90 ha near the confluence of Ribbonwood Creek and the Aruriri River to protect an area important for birdlife. There should be no grazing during the avian breeding season. Monitoring will be required to ensure there are no adverse effects of grazing on vegetative condition, but if such effects are recorded there should be provision to reduce stocking rate to a lower level.

Finally, FMC is grateful to the Farm Manager, Trent Spittal, for being helpful in granting permission for, and making arrangements for our recent inspection of the property. We are also grateful to both Darroch Ltd. and the Commissioner for Crown Lands for this opportunity to make submissions on the Preliminary Proposal for the tenure review of Ribbonwood.

Yours faithfully


pp Phil Glasson
Hon. Secretary, Federated Mountain Clubs of NZ, Inc.

Appendix 1. See next page.

Appendix 1

RECREATIONAL AND RELATED SIGNIFICANT INHERENT VALUES ON RIBBONWOOD STATION

*A Report to FMC based on Field Inspections and other research
to assist in the Crown Pastoral Lease Tenure Review Process*

April 1999

CONTENTS

Contents	page
List of Figures	2
Methods of survey and assessment	3
General description of Ribbonwood Station	3
Land resources of Ribbonwood	3
Significant inherent values	4
Recreational use and opportunities	4
Related significant inherent values	5
Canterbury Conservation Management (Draft) Strategy	5
Ribbonwood in the context of the wider Omarama/Ahuriri area	5
Conclusions	6
Acknowledgements	7
Maps showing the preferred allocation of public conservation land and freehold land (green and red outlines respectively) and important recreational access routes (yellow) ..	8, 9
Figures	Follow page 9

LIST OF FIGURES

Fig 1. General view of Ribbonwood Station with the homestead (centre) on the Quailburn Road and the Diadem Range behind the homestead. The access road through the valley of the Ahuriri River East Branch to the Ahuriri valley, which might be considered for 4WD use, can be seen on the right.

Fig 2. There are quite extensive areas of river flats, like these beside the Ahuriri, at both eastern and western ends of the property. These, together with the lower hill country (below about 1100m) seem to be capable of supporting ecologically sustainable pastoral use, and could become freehold.

Fig 3. The crest of the Diadem Range is quite seriously eroded LUC Class VIII land (above about 1100m) which cannot support ecologically sustainable pastoral use, and should be returned to full Crown ownership and control, and be managed by DOC for conservation and recreational purposes.

Fig 4. Pine trees were planted high in the East Diadem Creek basin by the former Catchment Board in an attempt to control erosion but these same trees are now a landscape disaster. These should now be removed to restore the landscape and to eliminate the threat of unwanted spread.

Fig 5. The access road from Ribbonwood homestead to the Ahuriri valley traverses above the Quailburn homestead and provides a vital link between the two areas of lower hill country on the property. It might also be used for recreational purposes, with the runholders consent.

Fig 6. Although not yet a problem on Ribbonwood Station, this spread of wilding trees on a neighbouring property illustrates what could happen. Strict controls on wilding tree spread should be a condition of freeholding the lower country.

RECREATION AND RELATED SIGNIFICANT INHERENT VALUES ON RIBBONWOOD STATION

METHODS OF SURVEY AND ASSESSMENT

A reconnaissance visit and preliminary field inspection was carried out in 1998, and a site inspection was made by aerial survey in March 1999. In part this report is based on the field inspections and in part it is based on information gathered from other sources. Those sources include both publications and accounts by members of local tramping and outdoor recreation groups that have been consulted about trips undertaken in the area. A study of "Outdoor Recreation in Otago" was undertaken by Mason (1989) and published by the Federated Mountain Clubs of New Zealand (FMC). Reference is made to this recreation plan for Otago in the recreational opportunity discussion below. Land Use Capability (LUC) maps have been used to assess the extent of soil types, Land Use Capability (LUC) Classes and topographic areas and their significance with respect to ecologically sustainable use. The Canterbury Conservation Management Strategy (Draft, September 1995) has also been used as a source of reference.

GENERAL DESCRIPTION OF RIBBONWOOD STATION

Ribbonwood Station is situated between the Ahuriri River and the Ohau outwash plain with the homestead at about 600m on the flats by the Serpentine Creek at the foot of the Diadem Range (Fig. 1). It is a moderately large pastoral lease of just over 7000ha. The property straddles the Diadem Range which rises to above 1700m along its crest between the headwaters of the East and West Diadem Creeks. There are quite extensive areas of paddocks on the flats adjacent to both the Ahuriri River and Serpentine Creek (Fig. 2). These areas of most useful farmland are not totally separated by the Diadem range because there is a good access road which generally keeps below about 1000m and follows the East Branch of the Ahuriri River, and traverses the hill slopes above and to the south of Quailburn Station homestead. This road also gives access to three airstrips.

The crest of the Diadem Range is quite seriously eroded (Fig. 3) and there are historic tree plantings high in the catchment of the East Diadem Creek which were put in by the Catchment Board in an attempt to control the erosion (Fig. 4). These plantings are now a landscape disaster, and constitute a threat of potential wilding spread.

Although the lessee has encouraged some forms of recreation the area has hitherto been relatively little used by trampers. This is in part due to pastoral lease tenure and associated difficulties of access, and also to the fact that there are other recreational opportunities in the Ahuriri area. The most popular recreational activities in the area are fishing and canoeing in the Ahuriri River which forms the western boundary of Ribbonwood (Fig. 2). It should be noted that the lessee did allow extensive public use of the lower slopes of Ribbonwood for the "Transit of Venus" observation.

Land resources of Ribbonwood Station

There is about 1800ha of Land Use Capability (LUC) Class III, IV and VI land (commonly yellow brown earth Pukaki soils) on the flats and fans in the vicinity of the Ahuriri River in the west and the homestead in the east (Figs. 1 and 2).

The highest ground, on the Diadem Range is classified as LUC Class VIII land (Kaikoura Steepland Soils developed on greywacke) which is not capable of supporting ecologically sustainable pastoral use (Fig. 3). There are some 1500ha of such land, generally above about 1100 to 1200m which should be returned to full Crown ownership and control and managed for conservation and recreation.

Between these two extremes there are some 4000ha (or over half the property) on LUC Class VI or VIIe land which may be capable of sustainable pastoral use if managed carefully. This land is characterised by Omarama and

Tengawai Steepland soils and surrounds the Diadem Range on its western, northern and eastern flanks (Figs. 2 and 4).

SIGNIFICANT INHERENT VALUES

FMC has researched the recreational and other significant inherent values on Ribbonwood Station. This included the site visits and both written and verbal accounts of tramping and climbing trips undertaken by members of recreation clubs in Canterbury and Otago. The following commentary and recommendations are based on our research and the site visit.

RECREATIONAL USE AND OPPORTUNITIES

The recreational use of the Ribbonwood Station should be considered in the wider context of public recreation in the Ahuriri/Ohau area. This area is not very far from the tourist Mecca of Mount Cook and the Mount Cook National Park. This area is an internationally well known tourist destination which attracts many outdoor enthusiasts and free and independent travellers (FITs). This area is heavily used by concessionaires who often also include aircraft use in their operations. As a result there is a demand for more peaceful and tranquil forms of recreation, particularly from New Zealanders seeking the enjoyment of natural quiet and the challenges of unspoilt places. The Ahuriri area could provide recreational opportunities for such people.

Mason (1988, 1989) has considered the recreational opportunities on most of the upland areas of Otago. Mason (1989) observed that this diverse region (Ahuriri/Dingle/Lindis) *“provides varied hill and mountain terrain, ranging from mountain glaciers and forests to gentle tussock hills.”* Ribbonwood is mainly in the gentle tussock category although the Diadem Range does rise above 1700m, and is probably better described as stony fellfield. Mason also observed that *“the mountainous areas have a long history of recreational use but although access is physically easy, the mix of public and private tenures means variable availability for public recreation, depending on the attitudes of individual land occupiers. There is considerable potential for a wide range of recreational activities as many areas are under-utilised at present.”*

Ribbonwood and the Diadem Range area gets very little recreational use at present. The most popular recreational activities in the area are fishing and canoeing in the Ahuriri River.

However, there are a number of features of Ribbonwood and the Diadem Range which suggest it is could become a more popular area in future. It is easily accessed from the Birchwood Road up the Ahuriri Valley (and the Ireland Road), or from the Quailburn Road to the Ribbonwood Homestead (Figs. 1 and 2). There are a number of prominent high points on the Diadem Range which could provide excellent vantage points (Fig. 3), and make attractive destinations for day trips (walking or mountain bike). A suggested trip would be up the farm track on the spur to the north of the East Diadem Creek, across the tops to the southern boundary, and down the track in Ribbonwood Creek. A public easement of foot and mountain bike use over this route should be negotiated through tenure review.

An increasing problem for people wishing to do day trips (and trips involving overnight stays) in the backcountry is security of car parking at road ends. Consideration should be given during the tenure review process to making provision where possible for car parking off highways, and in the most secure places possible near the start of new easements over land which becomes freehold through tenure review. In the case of Ribbonwood, such parking might be considered at the airstrip above the Quailburn homestead, and on the flats near the mouth of Ribbonwood Creek.

Consideration might also be given to the use of farm tracks by recreational 4WD vehicles. The problems with 4WD and trail bike use are twofold: they are incompatible with more passive forms of recreation, and they have potential to do great damage to tracks and wetland vegetation. There is also the question of who should be responsible for track maintenance. Nevertheless, it is a valid form of recreation and consideration needs to be given to what places might be suitable, bearing in mind these problems. Existing farm tracks in drier areas present opportunities where the risks of environmental and track damage are less than elsewhere and Ribbonwood Station may have opportunities which should be considered. Perhaps 4WD access over the track linking the Ohau outwash plain to the Ahuriri valley via its East Branch could be made available for public use with the runholder's consent (Fig. 5).

Thus, with better known opportunities for public use of the backcountry on Ribbonwood Station, a wider range of recreational activities would become available. These would not only be possible, but could also become popular because of the recreational potential of the property, and because of the potential clientele which is different from the tourist visitors to the nearby Mount Cook area.

RELATED SIGNIFICANT INHERENT VALUES

The National Water Conservation Order on the Ahuriri River and its tributaries recognised the outstanding characteristics of the River and determined that the waters should be protected. The characteristics which were recognised are as follows:- wild and scenic characteristics; natural characteristics; scientific values; and recreational purposes, in particular canoeing and fishing. It should be noted that the Ahuriri River forms the western boundary of Ribbonwood Station and access to and public use of this resource is therefore important.

In general landscape values are important for two reasons. Firstly, they underpin the recreational and public interests in the land itself, and secondly, as the scenic backdrop for tourism. In the case of Ribbonwood, the tourism interest is negligible but as a backdrop for recreation it is regrettable that the tree plantings are so intrusive in the upper part of the East Diadem Creek (Fig. 4). In order to restore the landscape value of the range, and to eliminate the potential threat of unwanted wilding spread, these trees should be removed at Crown expense. They were planted with public money so their removal should be a Crown responsibility.

A well known problem associated with the tree planting is the threat of wilding tree spread. This does not yet appear to be serious from the plantings in the East Diadem Creek catchment but the example just outside the property boundary on Glen Eyrie shows how the problem can escalate especially on the lower country (Fig. 6). There should be a clause in the freeholding agreement to ensure that wilding tree spread from all the plantings on Ribbonwood are kept under strict control.

CANTERBURY CONSERVATION MANAGEMENT STRATEGY (DRAFT)

The Canterbury Draft Conservation Management Strategy (CMS) states an objective *"to investigate Conservation Park Status for the areas managed by the Department in the Ohau/Ahuriri area, and if agreed to by the Minister, gazette a Conservation Park"*

It should be noted that in the context of this proposed Conservation Park, the amount of available land managed by the Department may be significantly increased through tenure review. If this does indeed happen, then the area and value (both natural and recreational) of the land to be incorporated into the Conservation Park, may also be significantly increased.

FMC argues that this is a good reason to seek the allocation of all suitable areas on Ribbonwood Station to DOC for management as conservation land. This would then enhance the objective stated in the CMS.

RIBBONWOOD STATION IN THE CONTEXT OF THE WIDER OMARAMA/AHURIRI AREA

An important part of the tenure review process which is sometimes overlooked, is to consider the property in question in relation to recreational and other related public interest values and accessways on neighbouring properties. Where neighbouring properties are also undergoing tenure review an overview should be taken of the outcomes over the entire geographic area.

None of the properties immediately adjacent to Ribbonwood and north of the Ahuriri River are yet formally in the tenure review process, but Longslip Station, across the river, is being considered for tenure review in Otago. Because the river effectively separates these properties, the recreational and conservation interests on Ribbonwood are not related to those on Longslip, other than in the common interest in in-stream activities in the Ahuriri itself.

CONCLUSIONS

Significant conservation and recreation gains are possible outcomes of this tenure review.

1. Because of the internationally well known tourist and recreational attractions of the Mount Cook area, increasing numbers of tourists and FIT travellers are coming to the area. This increase creates a need for a wider range of recreational opportunities (both summer and winter) than has been available hitherto. Not only do more people create a demand for more opportunities, but this also creates a need to ensure that the more traditional use of remote areas by New Zealanders seeking the enjoyment of natural quiet, and the challenges of the backcountry are still catered for.
2. With better known opportunities for public use of the backcountry on Ribbonwood Station, a range of recreational activities could become available. These would not only be possible, but could also become popular because of the recreational potential of the property, and because of the clientele whose needs are different from those of the tourists visitors to the Mount Cook area. The kinds of activities that Ribbonwood might provide include day walking and mountain bike trips over the Diadem Range and both fishing and canoeing in the Ahuriri River.
3. There are some 1500ha of potential conservation land on Ribbonwood Station. This is mainly LUC Class VIII land which straddles the Diadem Range above about 1100m. It should be returned to full Crown ownership and control and become conservation land to be managed for conservation and recreational purposes.
4. No formal access without the lessee's permission has been available in the past and this may have been a factor in the current low level of recreational activity on Ribbonwood Station. A formal access easement for foot and mountain bike use of the 4WD tracks as described above and indicated on the accompanying map would provide considerably more variety in recreational opportunities. This should be negotiated through the tenure review process.
5. Consideration should be given during tenure review negotiations to the issue of landscape values on the Diadem Range and the potential problem of wilding tree spread from the erosion control plantings of pines in the East Diadem Creek catchment. These trees should be removed by the Crown to restore the landscape values, and to eliminate the potential threat of unwanted wilding spread.
6. Some agreement should also be reached whereby the owner is also bound to control any wilding spread from tree plantings on the new freehold Ribbonwood land.
7. Consideration should also be given during tenure review to the need to provide secure parking at or near road ends for recreational users of the new conservation land. Negotiations should include the possible provision of parking as indicated above.
8. There is a large area of land, amounting to over half the property, that is all the land below about 1000 to 1100m which appears to be capable of supporting ecologically sustainable pastoral use and which could therefore be suitable for freeholding.

It is recommended that negotiations be pursued to achieve these objectives.

ACKNOWLEDGEMENTS

We are grateful to the Canterbury Regional Council who provided access to LUC maps, and local tramping club members and others who were helpful in providing accounts of trips undertaken in the area.

Submission 8



Dunedin Branch
PO Box 5793
Dunedin 9058

18.12.11

The Commissioner of Crown Lands
C/o Darroch Ltd.,
PO Box 27
Alexandra

Dear Sir,

I enclose these submissions on the preliminary proposal for Ribbonwood Pastoral Lease on behalf of the Dunedin Branch of Forest and Bird.

Thankyou for the opportunity to make submissions on this proposal and for arranging permission for us to inspect the lease.

Yours sincerely

Janet Ledingham
For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society

Email jledingham@xtra.co.nz
622 Highgate, Maori Hill, Dunedin 9010.
Phone 03 467 2960

Submission on the Preliminary Proposal for Ribbonwood Pastoral Lease

On behalf of the Dunedin Branch Forest and Bird Management Committee.

This submission is written on behalf of the Dunedin Branch of the Forest and Bird Protection Society which has approximately 900 members, many with strong interests in the High Country values and recreational opportunities as well as in botany and natural history in general. Many of the members enjoy active recreation in the back country and are very aware of the need to ensure the protection of natural values, vegetation and landscape, historical sites and to improve public access through the tenure review process.

The submission is written with reference to the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the government objectives for the South Island high country, especially the following:-

- *to promote the management of the Crown's high country in a way that is ecologically sustainable.*
- *to protect significant inherent values of reviewable land by the creation of protective measures; or preferably by restoration of the land concerned to full Crown ownership and control.*
- *to secure public access to and enjoyment of high country land.*
- *to ensure that conservation outcomes for the high country are consistent with the NZ Biodiversity Strategy to progressively establish a network of high country parks and reserves.*

This submission is based on knowledge of the lease from an inspection this month. We have also consulted the Conservation Resources Report (CRR) and are familiar with the adjoining Quailburn area.

Introduction

The Ribbonwood lease extends from the Ohau Basin west across the Diadem Range, at a maximum height of 1734m at Snowy Top, and down to the East Ahuriri River. The Homestead is on the Quailburn Road. The Ribbonwood Stream and West Diadem Creeks are both tributaries of the East Ahuriri River while East Diadem Creek flows into the Quail Burn and thence the Ahuriri near Omarama.

The proposal:

General description of proposal:

2.1 Approximately 2200 hectares to be restored to full Crown ownership and control as conservation area under section 35(2)(a)(i) Crown Pastoral Land Act 1998 (labelled "CA1" (1770 ha), "CA2" (20 ha) and "CA3" (410 ha) on the plan).

CA1 and CA3

CA1 and CA3 are essentially one area with CA3 distinguished by planted pine trees at high altitude, planted 40 years ago at a height of 1375 m with the mistaken idea that they would improve soil conservation. Wilding spread from those and later plantings are now a major problem but we understand that DOC is ready and willing to deal with them with newer methods now available and this must obviously be a priority to protect and enhance the SIVs within the CAs.

Within CA1 and CA3 there are numerous alpine plants, well described in the CRR, tussock cover of great importance for water conservation, the areas of cushion plants and the spectacular boulder

field landscape along the top of the Range. There are also considerable values worthy of protection in the upper reaches of West Diadem and in the Ribbonwood Stream at the southeast boundary. The views across to the Quail Burn, beyond to the Ahuriri Conservation Park and to Ohau and Pukakai to the north are outstanding.

We strongly endorse the creation of CA1 and CA3 for the permanent protection of the SIV's within those areas and note that this protection includes a valuable altitudinal sequence extending down to the edge of the East Ahuriri river terraces.

We are however aware that the CA boundary at the northeast is close to 1500m and that below that further to the northeast is more land in the Race and Gully blocks at an altitude of 1100-1500m with similar vegetation values which is proposed for freeholding in spite of the fact that it is classified as LUC Class VIII or Class VIIe land, and thus unsuitable for pastoral use, as it cannot be managed in a way that is ecologically sustainable.

CA2

CA2 is a small area of 20ha, a red tussock remnant in the low saddle linking the Ohau Basin with the Ahuriri. It was once a red tussock/sphagnum moss wetland, now modified through past burning and grazing. Designation as a protected CA should allow regeneration.

We strongly endorse the creation of CA2 and a Conservation Area.

2.3 Approximately 5090 hectares to be designated as land to be disposed of by freehold disposal to the Holder under section 35(3) Crown Pastoral Land Act 1998, subject to a qualified designation and a protective mechanism.

The area proposed for freeholding includes the modified and developed terraced flats of the Ahuriri, natural grassland flats along the East branch as well as the area proposed as a CC to protect the birdlife near the confluence with Ribbonwood Creek. It also includes modified land on the Diadem Range which has been extensively grazed, burnt oversown and topdressed.

The freehold area however includes land that runs up to 1435m and from what we observed the land from 1100-1435m has many of the values which are present in CA3 and CA1 and should be given CA status as well. As we have already noted, the CA boundary at the northeast is close to 1400m and below that further to the northeast is more land in the Race and Gully blocks at an altitude of 1100-1500m with similar vegetation values which is proposed for freeholding in spite of the fact that it is classified as LUC Class VIII or Class VIIe land, and thus unsuitable for pastoral use, as it cannot be managed in a way that is ecologically sustainable (Figures 1,2).

We do not accept that a case can be made for freeholding this land above 1100m. Merinos will still go to those height in search of food and we believe that significant SIVs could be lost under freehold management.

Some way needs to be found to protect the land between at least 1100 and 1400m in the Race and Gully Blocks at least, ideally by adding to the CA or with the possible option of a sustainable management covenant which would then need long-term extensive monitoring.

The Ahuriri Faces to be freeholded have significant landscape values for those passing up and down the Valley or tramping through from Quail Burn or the Ohau headwaters

We submit that there should be a landscape covenant over the Freeholded area on the Ahuriri Faces with the conditions that there is no burning, no planting of exotic trees or shrubs and with a requirement to control lupins which have the potential to destroy wading bird habitat in the riverbed.

Qualified Designation

2.3.1 Qualified designation under section 36(3)(b) Crown Pastoral Land Act 1998. An easement in gross to provide for public foot, mountain bike and horse access and conservation management access marked “a-b-c”, “e-f”, “e-g”, “h-i” and in the case of “d-b” and “d-j” access for conservation management only.

We support the above designations though we are not clear if there is access to ‘a’ from the river which we feel should be available.

In addition provision should be made for access to CCI so that the public can enjoy the birdlife within it.

Protective Mechanism

2.3.2 CC1 Protective mechanism under Sections 40(1)(b) and 40(2)(a) Crown Pastoral Land Act

This proposed covenant over 90 ha at the confluence of the East Ahuriri and Ribbonwood Stream is to protect bird habitat and allows limited grazing to control weeds.

We totally support the intent to protect the bird habitat but feel that it should also extend further upstream and ideally be a CA with a limited grazing easement rather than a CC. This would then mean that public access to the area was assured. We believe that the public should have access to this area to enjoy the birdlife.

Proposed covenant conditions

Under Owners’s obligations

3.2.1 should read “eradicate and control all weeds, including lupins”

3.2.3 should read –“keep the land from exotic tree species and lupins”

Schedule 1

2. The number of sheep should be specified. A figure of 90 is mentioned elsewhere in the proposal.

4. “The Minister may”, should read “the Minister shall”. The setting up of a monitoring programme is vital to ensure the best outcomes for the rare and endangered wading birds.

We thank Darroch Ltd. for arranging permission for us to inspect the lease and are grateful to the Farm Manager, Trent Spittal, for allowing us to visit the lease and helping us with inspection details.

Janet Ledingham,

For the Management Committee of the Dunedin Branch, Forest and Bird Protection Society.

18.12.11

Figures



Figure 1. Around 1152m, eroded country (outside the proposed CA) with tussock and native plants which should be included in the CA



Figure 2. One of the native plants in the above area *Carmichaelia vexillata*, which should be protected from grazing.

Submission 9



19 December 2011

The Commissioner of Crown Lands

c/- Darroch Limited

PO Box 27

ALEXANDRA

[emailed to luana.pentecost@darroch.co.nz]

Dear Luana

Ribbonwood Pastoral Lease: Tenure Review, Preliminary Proposal

The Canterbury-Aoraki Conservation Board has considered the Preliminary Proposal for Ribbonwood, and welcomes the opportunity to provide comment and support.

The Ribbonwood pastoral lease currently comprises 7,290 ha., and the Preliminary Proposal envisages that 5,090 ha. become freehold, while 2,200 ha. remain as Crown (conservation) lands in two geographically distinct parcels (one very small). In addition, there is a proposed Conservation Covenant over a 90 ha. stretch of the Ahuriri River East Branch.

The Board appreciates all the work that has gone into the process from all parties to-date, and overall it sees this as a reasonably balanced proposition. Nevertheless, there are areas where we believe significantly improved outcomes could be obtained. In considering this response, it is important to note that the Board's comments are underlain by concepts of "connectivity" and "holistic values".

At a high level it is noted that the lease sits on the north part of the Diadem Range (part of the eastern boundary of the McKenzie Basin), which is the first prominent range that is approached on the road from Omarama to the Lindis Pass. The range as a whole is covered by four pastoral leases—to the south of Ribbonwood lies Birdwood (no Preliminary Proposal yet), while to the southeast lies Ben Dhu, which has an executed (2005) Substantive Proposal. In a wedge between Birdwood and Ben Dhu sits the Ahuriri Downs lease (also yet to go through review). Given that these four leases cover a prominent, accessible range it is the Board's firm opinion that improved outcomes and value would have been obtained had all leases on the Diadem Range been considered as a whole. This would have enabled conservation and recreation values to be evaluated as a whole, rather than in a piecemeal manner, with consequently improved decisions and outcomes.

That an ad hoc approach results in reduced value is illustrated by linking the Ben Dhu decisions to this Preliminary Proposal. Ben Dhu resulted in a small (286 ha.) sliver of conservation land on the east side of the range near the ridgeline. Even though this area will, according to this Preliminary Proposal, adjoin the CA1 area, it is effectively isolated in terms of access, recreational flow and connectivity (i.e., it is not likely to add much to CA1 beyond some inherent ecological value), and by itself has only minimal landscape values.

Therefore, we continue to recommend that high country leases be evaluated in sensible groupings, rather than one at a time, with what we believe to be a consequent reduction in a variety of values.

In terms of the specifics of the Preliminary Proposal, we support the transfer of the basin flats to freehold—the land is highly modified, including blocks of plantation forestry, shelterbelts etc. Within that area, we strongly support the proposed conservation covenant CC1, with a stock-proof fence for the additional protection it provides to habitat for native birds that both nest and feed on the Ribbonwood estate. The surrounding freehold land is productive and extensively developed, so it is appropriate for CC1 to remain freehold with a covenant. While we recognise the need for some productive use of the land, we are concerned that use by stock during 7 months of the year may physically disrupt nesting habitat and disturb river habitats for native fish and thus devalue—to a greater or lesser extent—the rationale for the covenant. This needs to be taken into account when deciding on the stock number that can graze on the site (as per Schedule 2 of the Covenant).

In addition, it is not clear why the covenant has the bounds it does, and it seems more valuable to include a portion of the adjoining Ribbonwood Creek, which joins the Ahuriri River East Branch within CC1. In looking to the future, it should be noted that continuity of CC1 *into* the adjoining pastoral lease Birdwood is vital—the ecological values (breeding habitat for wetland birds) have already been identified in the conservation report for that lease.

In terms of other rivers, it is notable that the Ahuriri River, which adjoins land to be freeholded, has multiple values associated with it (e.g., for landscape, recreation, water supply and native habitat), and that the riverbed is subject to a Water Conservation Order in recognition of its outstanding conservation values. We are also mindful that the river margins are mobile, as is expected for a braided river. Thus, in order to maintain a full range of these values, we recommend that consideration be given to the specific exclusion of stock from the river margins (i.e., the thin strip from the edge of the terrace to the river), and suggest that a covenant or other form of protection is applied to this river margin. We emphasise that this is especially important in developing connectivity with the upstream Ohau Conservation Area, which reaches to the river.

Another area where there are potential issues is in the saddle and valleys separating the Diadem Range/Ribbonwood to the south and the Ohau Conservation Area to the north. The Board notes that the proposal will potentially create a degree of landscape discordance between the two sides of the valley; on the North side is conservation land, and on the south side will be some conservation land, but the greater proportion will be freehold, with the associated possibility of further development. There is no doubt that the saddle area, which links the Diadem and Ohau ranges, is visually significant, and that *some* types of development (e.g., tree planting) could therefore compromise the landscape values of the valley and of the Ohau Conservation Area, both directly and potentially indirectly (e.g., through wilding trees coming onto conservation land). While the Board recognises that a freehold corridor is necessary to effectively manage developed basin flats on both sides of the Diadem Range, it is of the opinion that there should be a light covenant in place across the Ahuriri East Branch valley–Serpentine Saddle area to acknowledge the inherent natural character of the landscape of the valley and simply require that developments that may significantly change that character (e.g., extensive tree planting) will be done in consultation with the Department of Conservation. This would create a sense of virtual connectivity in the landscape, which is important considering that there will be conservation land to the north and south, with a relatively thin strip of freehold land imbedded between them.

Moving to the East side of the Diadem Range, the Board notes that the proposed freehold area encompasses heavily modified land and is largely in keeping with 2005 Ben Dhu decisions and natural expectations of developed land. It is regrettable that past incongruous tree plantings have disrupted the natural character of the range for much of its elevation. This means in a wider sense that the proposed conservation areas have little landscape value (e.g., when viewed from the basin), but retain internal conservation and recreational coherence and value.

This brings us to the proposed conservation areas CA1 and CA3. The Board supports the proposal to incorporate these as conservation areas; these encompass the summit area of the Diadem Range,

which has highest level of intactness in the lease area, and are visually impressive. The vistas from the area to the surrounding peaks and basins are spectacular, and reflect the visual impact of the McKenzie Basin region. However, it is noted that significant work may be required in CA1/3 (e.g., tree removal at high altitudes) to secure its ecological viability, and that a significant proportion of the land is clear of vegetation.

It is positive to see that the proposal follows to some extent the areas identified in the conservation report as areas of the highest ecological and landscape value, but the west Diadem range in particular has been delineated at a much higher elevation and follows ridge lines (cuts across the landscape) instead of being based on ecological factors. This is surprising, given that the tall tussock reaches to lower elevations than what is delineated, that what is to remain freehold includes fairly deeply incised streams, and that there is extensive hieracium across the area—it does not seem that parts of the land to be freehold would be highly productive, and so the rationale for their exclusion from the CA proposal is uncertain. It would seem better to have the CA1 boundary at a lower elevation while still following natural fencelines. This would enhance both the conservation and recreational value of the land, and, indeed, the landscape value on that side of the range. As it stands, large parts of the proposed CA1/3 are not visible from the basin on either side of the range.

In terms of the current CMS objectives for Waitaki, the proposal meets the objective to have new recreational opportunities, and to maintain and enhance natural landscape and biodiversity values. The need for conservation of Category A and B species is more met through CC1, rather than CA1/3.

Finally, the Board feels that there are perhaps opportunities for the freeholders to manage the upper reaches of the proposed freehold land and maintain landscape continuity while developing recreational opportunities that fit seamlessly with the Conservation Area opportunities.

Summary:

The Board *supports* the creation of a Conservation Area based on CA1 and CA3, and CA2 being adjacent to the Ohau Conservation Area. It also strongly supports the creation of CC1.

The Board *recommends* that the possibility of (i) extending CC1 partly along Ribbonwood Creek, (ii) creating a protection mechanism over the margins of the Ahuriri River, (iii) placing a simple landscape-based conservation covenant over the Ahuriri River East Branch—saddle area, and (iv) extending CA1 to include the upper reaches of the incised streams on the West side of the range and to in general reach a lower elevation.

Implementing these recommendations is not likely to adversely affect the economic viability of the freehold land *as an entire unit*, so the issues should be examined rigorously to see that the recommendations can be adopted. In developing a Substantive Proposal the parties are encouraged to explore win/win options that ultimately would benefit both the freeholder and conservation/recreation interests.

The Board *suggests* that in the future the freeholder consider working with the Department of Conservation to increase the landscape values of the range and develop recreational opportunities, including the potential for being a gateway to the wider Ohau Conservation Area.

Prepared by: **Alan R Grey**

Canterbury-Aoraki Conservation Board

Contact: Brenda Preston (bpreston@doc.govt.nz)
Board Liaison Officer
Private Bag 4715
Christchurch 8011
(03) 371 3756.

Submission 10



20 December 2011

Commissioner of Crown Lands
C/- Darroch Limited
PO Box 27
ALEXANDRA 9320



Preliminary Proposal for Tenure Review of the Ribbonwood Pastoral Lease Po 247 Submission from the Walking Access Commission

Thank you for the opportunity to comment on the Preliminary Proposal for the tenure review of the Ribbonwood pastoral lease. As you will appreciate, this is the first opportunity that the New Zealand Walking Access Commission (the Commission) has had to comment on this proposal.

We have not had the opportunity to undertake a ground inspection.

The following submission should be considered as new information as, to date, the tenure review planning, extensive discussion and consultation have been undertaken without input from the Commission.

The Commission's public access statutory role is described below, under section **A. Introduction**, and the detailed submission is presented in section **B. Submission**.

In summary, the Commission:

- supports the creation of the proposed public access easement 'a-b-c', 'h-i', 'e-f' and 'e-g'.

The Commission also seeks to have:

- all existing legal access to the pastoral lease boundaries, including adjoining areas of Crown land, clearly depicted on the plan,
- appropriate information provided to identify which waterways qualify for marginal strips shown on the plan,
- marginal strips created with sufficient width to enable practical public access
- unobstructed public access along marginal strips, with the use of stiles and/or gates as appropriate in any fence which may cross over a marginal strip,
- unrestricted public access provided for on easement 'a-b-c', and
- public vehicle access to the Ahuriri Conservation Park from Ireland Road, 'e-g'.

A. Introduction

Purpose, Objective and Functions of the NZ Walking Access Commission

The Walking Access Act 2008 (sections 3, 9 and 10) sets out the purpose, objective and functions of the NZ Walking Access Commission.

Central to its role is the Commission's leadership functions in negotiation and provision of free, certain, enduring and practical access to the outdoors for New Zealanders and visitors.

Focus of Submission is Public Access

The Commission's submission on this Preliminary Proposal is designed, as envisaged by the Act, to achieve appropriate, enduring and future focused public access in this area of New Zealand.

The Commission's submission reinforces the objectives of the Crown Pastoral Land Act 1998 (CPL Act), in particular section 24(c) which is to make easier the securing of public access to and enjoyment of reviewable land. Specifically, our submission addresses the public access and public enjoyment matters specified in subsection (2) (c) and (d) of section 40 of the Crown Pastoral Land Act 1998.

The Commission was not consulted during the preparation of this preliminary proposal, which had commenced well before the introduction of the Walking Access Act 2008. Nor has the Commission had the opportunity to undertake a ground inspection.

Therefore, this submission should be considered as new information - provided by the Crown agency with statutory responsibility¹ for leading and supporting the negotiation, establishment, maintenance, and improvement of:

- walking access (including walkways, which are one form of walking access) over public and private land; and
- types of access that may be associated with walking access, such as access with firearms, dogs, bicycles, and motor vehicles.

B. Submission

General comments

Without a map to place the pastoral lease in a physical context it is difficult to see how the Preliminary Proposal adequately addresses section 24(c)(i) of the CPL Act (the securing of public access to and enjoyment of reviewable land).

While the legal road (Quailburn Road) is shown as dissecting the northern portion of the lease, there is no other indication of what, if any, public access to the lease currently exists or is planned. The identification of existing legal access that adjoins the lease parcels is a key factor in considering how appropriate the public access resulting from the tenure review is.

Part 4A of the Conservation Act 1987 applies to the disposition of all land being freeholded under tenure review. While we understand that the Commissioner of Crown Lands may have no statutory function in the reservation from sale of marginal strips, the identification of qualifying waterways is a key factor when considering the adequacy of public access proposed in tenure reviews. The Preliminary Proposal plan should identify this information, or it should at least be made available with the advertising of the Preliminary Proposal.

¹ Section 3(b) Walking Access Act 2008

Additional detail is therefore required to enable a meaningful assessment of the adequacy of access proposed in the Preliminary Proposal.

The Commission seeks to have:

1. *All the following parcels of land clearly depicted and described on the plan (where the parcels are in close proximity to, adjoin, or are within the pastoral lease boundary):*
 - *Legal roads – formed and unformed.*
 - *Public rights of way.*
 - *Unallocated Crown Land.*
 - *Allocated land of the Crown (with clear description of public access rights).*
 - *Marginal strips – both existing and proposed.*
 - *Other riparian parcels of land which provide public access.*
 - *Covenanted areas over which public may have access.*
2. *Appropriate information provided to identify which waterways qualify for marginal strips and for this information to be shown on the plan - or at least be provided with the summary of the preliminary proposal.*

Existing public access

Quailburn Road splits the northern area of the lease. There is also a legal road (Ireland Road) which provides legal access to the southern tip of the lease in the Ahuriri valley.

The entire north-western boundary is with lands of the Ahuriri Conservation Park, where public walking access can generally be assumed.

The Qualifying Water Bodies Assessment identifies that the Ahuriri River and the Ahuriri River East Branch are subject to a marginal strip (S.O 23806 refers), but the practicality of this public access is not known.

Proposed public access

The Preliminary Proposal provides only one internal public access route to CA1 and CA3, which is up the southern boundary ('e-f') from Ireland Road. There is no public access proposed directly off Quailburn Road.

Public non-motorised access is proposed alongside the Ahuriri River to the adjoining Ahuriri Conservation Park ('e-g'), and between the Conservation Park and CA1/CA3 ('a-b-c' and 'h-i'), although the access 'a-b-c' is proposed to be closed from 1 November to 20 December each year.

The Qualifying Water Bodies Assessment identifies that Ribbonwood Stream is a qualifying water body under Part 4A Conservation Act 1987. Legal public access will therefore be possible on the marginal strips adjoining Ribbonwood Stream. As Ribbonwood Stream is not completely confined within the Ribbonwood pastoral lease boundary, the marginal strips will not necessarily provide public access to CA1, which means that the easement e-f is very important.

The Commission:

3. *Supports the creation of the proposed public access easement 'a-b-c', 'h-i', 'e-f' and 'e-g'.*
4. *Seeks to ensure that marginal strips to be created on waterways within the pastoral lease*

will be created with sufficient width to enable practical public access, and

- 5. Seeks to have unobstructed public access along marginal strips, with the use of gates, as appropriate, in any fence which may cross over a marginal strip.*

Desirable public access

It is highly desirable that unrestricted public access be available. Section 2.3.1 of the summary document states that "The route "a-b-c" shall be closed from 1 November to 20 December each year during lambing.", and section 3 states that part of the proposed access "... will have a significant impact on the property if use increases because part passes through an important farm production area where access is proposed to be restricted for six weeks of the year."

There is insufficient information presented in the document to justify any restriction on public use of 'a-b-c', and closure for lambing is difficult to reconcile given that virtually all of 'a-b-c' appears to be above 980 m asl, with most of it clearly higher than 1100 m asl.

The Commission:

- 6. Seeks to have unimpeded public access provided for on 'a-b-c' as there is inadequate justification provided to warrant any annual closure.*

Vehicle access to conservation areas is very desirable, and it would assist the public to have 4 wheel drive access from the northern end of Ireland Road at the southern corner of the lease to the boundary with the Ahuriri Conservation Park some 5.0 to 5.5 km to the north. There appears to be an existing vehicle track for at least part of the way, on the river side of the shelter belts, and this access would cause minimal disruption to the farming operation. It would enhance access to the river for fishermen, and also assist other recreationalists to reach the Conservation Park on the eastern side of the Ahuriri River.

The Commission:

- 7. Seeks to have public vehicle access provided to the Ahuriri Conservation Park from Ireland Road, 'e-g' on the plan.*

Thank you for the opportunity to make a submission on the Preliminary Proposal for tenure review of the Ribbonwood pastoral lease.

We request timely advice as to how the points we have raised have been analysed and what amendments, if any, are subsequently proposed to the Preliminary Proposal designations.

Yours sincerely



Mark Neeson
Chief Executive

Submission 11

21 December 2011

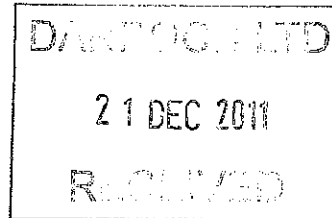
Luana Pentecost

Property Administrator

Darroch Limited

P O Box 27

ALEXANDRA



Dear Luana

Ribbonwood Pastoral Lease Tenure Review Proposal

I wish to make submissions on the proposed tenure review of Ribbonwood Pastoral Lease. I apologise for the lateness and hope you will accept my submission. I had assisted with the preparation of the submission from Central Otago Lakes Forest and Bird, of which I am a committee member, however owing to work pressures I missed the internal deadline for getting our submission away. I have a number of points to make about the proposal, some of which were not addressed in our submission.

I set these out below, making this submission in my own personal capacity as an experienced and well qualified (registered) landscape architect. I have considerable knowledge of the Mackenzie/Upper Waitaki basins, having lived in the Mackenzie on a sheep station the first 20-30 years of my life and I am also now a Committee Member of the Upper Waitaki Zone Committee (Canterbury Water Management Strategy). Over the period 1996 -2003 I carried out over 40 landscape assessments for tenure reviews on Canterbury pastoral leases on contract to the Department of Conservation. Since moving to Wanaka in 2001 I have been part of the Forest and Bird "team" looking at tenure review proposals for Otago and South Canterbury pastoral leases.

I inspected Ribbonwood along with the other "team" members on 12th December and also on 10th December from the Ahuriri valley.

Proposed Freehold/Conservation Area boundary

I support the retention of the high altitude summit lands as conservation area. They are clearly not able to support any pastoral use, and have very high values for recreation and landscape enjoyment.

The use of the existing fences as the boundary however is not supported. Large areas of Class VII and VIII land lie below the fences. Whilst it is recognised pastoral use will generally focus on the lower lands, Merino sheep will drift up the faces. Essentially the status quo is being maintained. As the proposal acknowledges, on-going grazing of these higher lands, above 900-1000m altitude, cannot

be sustained ecologically . No fertiliser is applied to these areas because of the short growing season and it is not economic. The absence of fertiliser application above 1000m is also recognised in the proposal. The on-going “mining” of nutrients and slow degradation of the tall tussock lands will continue. In places the lower tall tussock communities will be converted to exotic pasture. The lowest tall tussock is the most valuable, being the scarcest communities. Tall tussock is essential for water capture, storage and yield. Protection of tall tussock is therefore very important considering how valuable water resources are.

In order to meet the first principle of the Crown Pastoral Land Act 1998, these areas need to be fenced off permanently. This will involve considerable new fencing, however this is typical of many tenure reviews. It is a one off cost with long term ecological and landscape gains. I also cannot see how a high altitude fence would be easier to maintain than a lower fence around the 800-900m contour – which would receive less snow, is on easier country generally with less snow drift and is easier to get to on a regular basis for both monitoring and repairs.

With careful choice of alignment following natural folds in the land; avoiding setting up high points where sheep will naturally camp; and avoiding topdressing right up to the fence an unsightly visual contrast and line can be avoided. The new fence lines are not to be bladed for visual reasons and to avoid introducing weeds.

Quailburn Saddle and CA2

I support the inclusion of the remnant of red tussock within the adjacent conservation area. However the land generally here is over 1000m and there are other areas of red tussock near the plantation. This land would be better placed within conservation estate (and better meet the first object of the CPL Act). My suggestion is that the land east and north of the plantation is part of the conservation area, thus allowing a continuity of public land across the saddle and up on to Snowy Top and the Diadem Range; as well as full altitudinal sequences of vegetation and landforms. The inclusion of the area about the saddle in conservation land would also have a better landscape and visual outcome, avoiding uncharacteristic scrub clearance and greening and fence lines in the area. The existing development changes would diminish over time including the plantation (except for the track which I accept, and possibly the airstrip if it is still used).

A proposed new fence line would follow the track east to meet the fence running up to point 1165.

The existing 4WD track can be the centre of a farm management /stock movement easement 20m wide through the area.

Route h-i would not be necessary as there would be all-year access to the east of the plantation, along the saddle crest. This is a more logical route than either a-b or h- i with respect to the existing track up the Quailburn on to the saddle and would not require any new track building (otherwise necessary to reach point ‘a’). Route a-b-c would also be entirely within conservation land and therefore not required as an easement.

Soil Conservation Plantings

It is good that these old Catchment Board plantings will be within the new conservation area, as the DOC is best placed to effectively deal with these. Removal of these trees will save a lot of DOC and volunteer time and money in the future, by removing the source of wildings.

They are also visually very out of place. Removal will restore the original natural character.

The plantation on the Quailburn Saddle should like-wise be removed. DOC has worked hard to clear the saddle area of wilding conifers. It would be very unfortunate if this good work was all undone.

East Branch Ahuriri River and Ribbonwood Creek

An inspection of this river system both on the ground and through Google shows it is consistent in character along its length within the lease area. The proposed covenant should cover the whole system, between the natural terraces.

The purpose of the covenant is to maintain the natural character of the river in a visual sense, on a landscape scale, as well as protecting its value as habitat particularly for the bird species as described in the Conservation Resources Report. The system includes a variety of inter-connected habitats, including dryland terraces, backswamps, seepages, small side streams with riparian herbage, woody shrubland, occasional larger trees, and open gravel and boulder riverbed as well as the small river itself. All this needs to be protected.

A covenant covering the whole system within the lease would provide continuity between the Quailburn/Ohau conservation area and the Ahuriri River.

The (sheep only) stocking rate needs to be kept low, and I support exclusion during bird nesting period.

The covenant is also to require any exotic weeds with spread potential to be removed such as crack willow, wilding conifers, lupins, broom and gorse.

This covenant should also extend up Ribbonwood Creek which has similar values albeit on a smaller scale. Connectivity to the Diadem conservation area is important however.

Ahuriri River Terraces

The Ahuriri terraces are an integral part of the Ahuriri River valley, a very important and outstanding braided river. The protection of its natural character both in a visual and ecological/hydrological sense is paramount.

There is little grazing value given the small areas involved and the thin stony recent soils. However some sheep grazing (only) is probably beneficial in controlling rank exotic growth and maintaining open habitat.

There should be a covenant over these terraces as well, the object of which is to maintain natural character and protect habitat.

Grazing is to be restricted to sheep only. Whether there needs to be exclusion during bird breeding season is a matter for expert advice from DOC. There is to be no further cultivation or oversowing and topdressing, or any tree planting. All spread risk weed species are to be promptly removed if they appear (such as lupins, gorse, broom, wilding trees).

Regarding the access e-g, at the southeast end there is a formed 4WD track angling up the scarp just near the power line. This would be a logical way to get to the top of the scarp, rather than further west where there is no track. Having the route along the top of the scarp is good, providing an excellent overview of the large riverbed in its mountain valley setting, as well as keeping people away from the river where they disturb the birds. It is also a very easy route.

Ohau Basin Floor

Bog Pine

There is a small remnant of bog pine close to the road about 1km southeast of the west boundary with Tarn Brae. Whilst insignificant ecologically compared to Ben Dhu Reserve populations, it is a highly visible remnant of the original character. It deserves protection from cattle and deer browsing and removal.

Streams

Even though modified and surrounded by developed pasture, the streams running through the basin floor block need to be protected. I note these were identified as having significant value in the CRR. The northern Wairepo stream feeds into the Benmore Swamp, which is proposed for funding to protect and enhance it in the ECAN Immediate Steps Biodiversity funding programme.

Protection can be way of covenant. They need to be fenced from cattle and deer or intensive sheep grazing. Topdressing is to be kept at least 20m away from wetland/stream margins. Some light sheep grazing will be necessary to control rank growth, the only alternative being to plant them out in permanent preferably indigenous riparian vegetation.

Whilst these measures are considered best practice, there is no compulsion - they are voluntary. It is incumbent on the tenure review process to ensure these values are protected, if it is to comply with the objects of the CPLA.

Wilding Tree Spread

All Pinus contorta is to be removed from existing shelter belts. This is particularly relevant to Tarn Brae conservation area where wilding tree spread from Ribbonwood is a prominent issue requiring extensive DOC (public) resources to deal with excessive wilding spread on an on going basis.

I trust my submissions will be taken into account and I thank you for accepting them. I look forward to seeing the outcome of this tenure review in due course,

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Steven', with a long horizontal flourish extending to the right.

Anne Steven

Registered Landscape Architect

P O Box 576

Wanaka