

Crown Pastoral Land Tenure Review

Lease Name: Dunstan Downs

Lease Number: Po019

Public Submissions - Part 1 (Submissions 1-7)

These submissions were received as a result of the public advertising of the Dunstan Downs Preliminary Proposal

30 Earnsclough Road
Alexandra
23/11/20

Craig Harris
Commissioner of Crown Lands
Land Information New Zealand.
Email: pastoral&tenurereview@linz.govt.nz

Dear Commissioner,

Dunstan Downs Crown pastoral lease tenure review preliminary proposal

Introduction

I am submitting because I see a failure to recognise a future problem with wild animal management of the Wether range and beyond. This review adds to the problems associated with neighbouring completed reviews and sets up a corridor for South Canterbury pests (wallaby's) along with wild animals to move at will to Central Otago and onward. That problem will be aggravated with the removal of stock resulting in more vegetation, no farmer and having a situation of no guns being allowed entry along the Wether range.

Because there is no mention of the public being able to carry guns I can only assume that this review is likely to copy the public easements of the other reviews in this area.

Purpose of the review

Part 2 of the Crown Pastoral Land Act
1998:

Section 24

(a) to-

(i) promote the management of reviewable land in a way that is ecologically sustainability

(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 concerned to full Crown ownership and control,

and the following object:

(c) subject to paragraphs (a) and (b), to make easier-

(i) the securing of public access to and enjoyment of reviewable land.

(i)& (b) This review apparently takes for granted that the ecologically sustainability and the protection of significant inherent values will be addressed in the future.

1.Proposal

Gun carriage must be allowed on any public easement granted. This will help manage pests and wild animals into the future and will be in line with *(i)& (b)* of section 24.

Reason

While the present owners have a concession for grazing, they have a requirement to carry out wild animal and pest control, however at the end of the concession term what happens?

If this review has a similar public access to others in the area, then no recreational hunting is available on the Wether range.

2.Proposal

That 4WD access be made available in this review to the top of the Wether range.

Reason

c)(i)

Would surely point out that the wonderful views from top of this area, should be available for as many of the General public as possible instead of inhibiting possibly the biggest user groups and the 90% who are not fit enough.

Your reason for excluding all 4WD vehicles because of possible dangers for inexperienced drivers is quite wrong.

There are not many 4WD alpine tracks that don't have dangerous scenarios at different times.

Should that mean the end of 4 Wheel Driving.

Further as a Land manager your obligation for allowing recreational entry to our land is only to point out the "out of the ordinary" circumstances.

This would raise the likelihood of either Hunters and Photographers being in the area when pests and wild animals are more likely to be encountered (early morning and dusk). At the moment these 2 recreations are severely hampered and you will loose their vigilance.

There is also very little encouragement to enjoy the wonderful surrounding views available of our own country from the Wether range when you place such a steep walk to the top in front of them.

Thank you for the chance to make a submission

Alan Mackie

From: [Andrew and Loretta Bush](#)
To: [pastoral & tenure review](#)
Subject: Dunstan Downs Crown Pastoral Lease Tenure Review Preliminary Proposal Submission (Reference Po 019)
Date: Tuesday, 24 November 2020 10:09:28 a.m.

Dear Commissioner

I apologise for this unprofessional submission, but I haven't done this before. I do feel strongly that I do need to make my views known. I think that return of this land to Crown ownership and management is the right thing to do, to protect all the inherent values of the land and to allow public access. The easiest and ideal solution would be for the Crown (DOC) to take over the entire property, (except for the homestead and surrounding land). This would solve all the complicated easements, different levels of conservation areas, etc.

However, in the real world, the proposal as written is a start, which I appreciate.

I strongly support both CA 1 and CA 2.

Some points I would like to mention, is that Conservation Covenants are not worth the paper they are written on, and so, both CC1 and CC2 should be incorporated into Conservation areas.

There is incomplete and out of date info on skinks and freshwater systems, so there may well be other areas which should also be Conservation areas. This is another reason why just putting the entire property under Crown Ownership would be a good idea.

I also think it is important for there to be 4WD access along the pylon road. This road was put in by the NZED, paid for by public money, and so the public should still be able to have controlled access.

Otherwise it would be nigh on impossible for a large majority of the public to be able to access this land and enjoy it, which I thought was part of the purpose of this tenure review. This would also allow hunters and their dogs access, which is important for helping to control deer and pigs which can destroy the native environment. With this access, it will help keep these pests under control.

Thankyou for the opportunity for me to have my have my say. I am part of a local walking/tramping group, who appreciates being able to get out into our beautiful environment. We need to have some driveable access, so we can then get up to the higher places.

Thanks again.

Loretta

Loretta Bush
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Alexandra

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24 November 2020

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**SUBMISSIONS on the PRELIMINARY PROPOSAL for TENURE REVIEW:
DUNSTAN DOWNS PASTORAL LEASE PO 019**

Proposed Access a-b

I support the provision for the public access a-b in principle. I note it is proposed for horse riding as well as pedestrian use.

I am a keen horse rider, preferring to trail ride in open country. There is a good opportunity for a good horse-riding route starting and finishing at 'a'; or starting from here or finishing here, but not going to 'b'. More usefully, is the start or finish for a ride along the Pylon Track through Morven Hills and Dunstan Downs. Another good route would be south from 'a' along the pylon track, then a climb up to Old Man Peak, then along the summit of the Dunstan Range and back down the 4WD track on the true left of McClays Creek basin. Alternatively, one could drop down into the Dunstan Creek valley and stay a night or two then climb back out.

A large area for parking several floats and horse trucks should be made available at 'A' to enable safe and secure area to unload /load horses and tack up/tack down, for potentially groups of riders out to enjoy a high country ride.

There should be riding access along the pylon road between 'a' and the road on Morven Hills at the south property boundary, which is open to public horse riding. The Morven Hills track can be accessed at the north end of the Lindis Pass Scenic Reserve, through public conservation land. However, there is nowhere to park floats/trucks and tack up/down, safe and fenced away from a very busy highway. There is little flat ground here either suitable for parking several vehicles.

Preferably there are gates without locks to access the pylon track either end, designed in a way to prevent vehicles (make it too narrow, but no less than 1.3m wide) and trail bikes. Alternatively a combination lock could be put on a gate with an arrangement for easy access to the code, combined with leaving your contact details such as vehicle number plate.

Horse riding access should be provided for on the 4WD track between the pylon road and Old Man Peak, on the true left of the McClays Creek basin, to provide for a riding loop. It would be acceptable to close the lower section for lambing if this was through a lambing block (within the proposed freehold). The upper section is through proposed conservation land with a non-renewable grazing concession for 100 sus only so there would be no issue with stock there.

Proposed CC1

CC1 contains a precious remnant of the pre-human high country vegetation types – totara-broadleaf forest and grey shrublands including at least two Threatened/At Risk species (*Olearia fimbriata* and

Coprosma intertexta). As well as being a striking and memorable landscape feature of high aesthetic value, the totara relict is a window to the past. This area should be part of GC1, as public conservation land. The proposed covenant precludes any grazing so there is no reason to freehold it as there is no economic gain from the area. It would be easy to put a new fence along north side of the scree the totara is on, between the existing contour fence and McClays Creek. The existing dog leg which is an unnatural line in the land scape could be removed, restoring visual cohesion and integrity to the landscape.

There should be public access into the area where the totara forest remnant is and the grey shrubland along McLays Creek in its vicinity. People who are interested should be able to access the area to study the flora and enjoy it up close. There is no public access directly off the highway to other totara forest remnants in the Longslip valley or at Killermont nearby. The McClays Creek totara would be a short easy walk from the Highway.

Easement a-b as shown does not reach the remnant or McClays Creek. This would not be an issue if the land is public conservation land within GC1, with year-round proposed rights of public access. If the land remains as freehold with a covenant, I support the exclusion of stock with the fencing off of the area from stock so it is effectively left to regenerate into native woody cover and blend with the adjoining GC1. In this case easement a-b would need to extend to CC1 and there should be year round right to roam within CC1 to enjoy its values. As it is proposed to exclude grazing within CC1 this should be possible.

Yours sincerely
Anne Steven

55 Rata St
Wanaka 9305



Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki

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23 November 2020

Dear Sir/Madam

Submission on Dunstan Downs Tenure Review

Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki (the Board) is an independent body established by the Conservation Act 1987. Made up of 12 government and iwi-appointed members, the Board represents the community of interest not only in the work of Te Papa Atawhai Department of Conservation (the Department) but also in conservation in general within Canterbury.

The Board's main responsibility is to work with the Department to develop a conservation management strategy for our area and to oversee its implementation. The process for developing the strategy involved full public consultation and hearings and the Board believes the Canterbury Waitaha Conservation Management Strategy 2016 (the CMS) fairly reflects the views of the wider community. The strategy contains a vision, objectives and policies for this region which are aligned with the Government's national objectives for conservation. The CMS was signed off by the Minister of Conservation and became operational in 2016.

The 50-year vision articulated in the CMS describes a Canterbury where

"The high-country basins retain their natural, open, unspoiled character." (page 18)

Intensification of land use is identified as a threat to outstanding landscapes in Canterbury and, by implication, a threat or barrier to achieving the long-term vision.

CMS Policy 1.5.1.11 requires Te Papa Atawhai to *"Contribute to the Crown tenure review process to seek the best protection of significant inherent values"*. The Board supports the Department in this work. (page 32)

CMS Policy 2.2.14 refers to the future status of any conservation lands coming out of the Dunstan Downs tenure review: *“Undertake, in conjunction with Otago (and in consideration of whether Crown Pastoral Land Act Tenure Reviews have been completed in these areas), a land status review for public conservation lands and waters within the Lindis Pass and Longslip area...which do not fall within the extent of potential land additions to conservation parks as listed in Table 5, having regard to land options under the Conservation and Reserves Acts.”* (page 55)

The potential land additions to Oteake Conservation Park identified in Table 5 are *“Within Canterbury, conservation areas within the Otemamata River catchment and the surrounding ranges of the Hawkdun, Ewe, Ida, St Bathans and St Marys.”* (page 58). So, this does not include any of the Dunstan Downs land proposed as conservation area in the preliminary proposal.

Dunstan Downs

The preliminary proposal was briefly discussed at the Board's meeting on 9 October 2020 and a member of the Board was nominated to undertake a site inspection on 29 September 2020. This submission has been agreed by email and will be formally ratified at the Board's next meeting on 27 November 2020.

The following submission points were agreed:

1. The Board **strongly supports** the designations for areas CA1 (800ha approx.), CA2 (200ha approx.) and CA3 (5,356ha approx.) to be restored to Crown control as conservation area for the reasons outlined in the Summary of Preliminary Proposal.
2. The Board accepts the qualification on CA3 enabling continued farm access with the additional words to *'clause b'* so that it reads *“The Concessionaire may maintain the surface of the easement to a standard to allow safe passage, but may not alter the alignment of the track within the easement or undertake visible earthworks.”* or similar words to prevent new scarring of the landscape during maintenance.
3. The Board **supports** the designations GC1 (850ha approx.) and GC2 (2,330ha approx.) to be restored to the Crown as a conservation area for the reasons outlined in the Summary of Preliminary Proposal.
4. The Board accepts the need for one-off sheep grazing concessions to support the transition from pastoral lease to freehold farming operations but is concerned about the long-term impact of such grazing particularly in the upper McLays Creek catchment (GC1). Class VIII land in upper McLays Creek was to have been retired many years ago but the run plan was never fully implemented. The Board **recommends** reduction of the term of the grazing licence in GC1 from 15 to 10 years.
5. Given that Significant Inherent Values identified in GC2 *“will be best managed by the removal of grazing allowing growth and recruitment”* the Board **recommends** a reduction in the term of the grazing concession from 10 to 5 years, to enable the vegetation in the wide Dunstan Creek valley to recover more quickly.

6. The Board is **strongly opposed** to the proposed freeholding of area CC1 even with the conservation covenant. This area includes a fan adjacent to McLays Creek with a remnant of Hall's tōtara and mountain toatoa forest and a lowland shrubland plant community with associated invertebrates on the valley floor. On inspection day the Board's representative was disappointed not to be able to inspect this area more closely. Foot or 4WD access was denied by the lessee because of lambing. However even from the air, the relict podocarp stand is strikingly distinct and one of the most interesting landscape features on the whole pastoral lease.
7. It is puzzling that CC1 is proposed to be freehold presumably for farming purposes, while at the same time the whole 30ha area is subject to a covenant which requires "no stock to be deliberately grazed" within it. Possibly the current lessees have other plans for area CC1.
8. There is an ambiguity about whether there will be stock in CC1 or not. While the podocarp forest and shrublands may be largely inaccessible to stock the absence of fences still leaves the vegetation vulnerable, but the construction of fences close to the feature would detract from its visual value.
9. Instead of freeholding with a covenant the Board **strongly recommends** the area CC1 be restored to Crown control as a conservation area pursuant to Section 35(2)(b)(i) Crown Pastoral Land Act. "Restoration of this land to full crown ownership and control" is by far the most effective (preferred) way "to enable the protection of these Significant Inherent Values".
10. The Board has major concerns about the potential landscape effects of the proposals in the visual catchment of the nationally and internationally renowned Lindis Pass (Okahu) landscape. The State Highway 8 approach to Lindis Pass from the point where the highway turns away from the Ahuriri and heads into the Longslip Valley is an integral part of experiencing this extraordinary landscape. There is a heightened sense of anticipation as modifications fall behind and the landscape becomes increasingly natural in character as the Lindis Pass Scenic Reserve is approached. The experience is reversed when descending from the pass. Re-entry into a more enclosed modified landscape almost comes as a relief after the scale of the awesomeness at the top of the pass.
11. The way Dunstan Downs has been managed historically has helped to maintain this experience and the Board fears freeholding may fast track the incremental change already occurring resulting in permanent loss of these values.
12. There is a critical point about halfway up where the road turns a bend passing a rock outcrop opposite a spur on the other side of Longslip Creek. These two features together form a natural threshold. It is absolutely essential that the landscape upstream of this point remain predominately natural in character. This is acknowledged to some degree in the Preliminary Proposal by the covenanting of some of the visual catchment, but the Board **recommends** that covenant CC2 be extended north to include proposed freehold land surrounding the natural threshold or "gateway" and preferably as far north as the point where the highway crosses McLays Creek.

13. The Board has concerns about the terms of the conservation covenant proposed for the freehold area CC2 (865ha approx.).
14. Even though they have been previously over-sown and top-dressed and probably burnt, these hill slopes retain a high degree of naturalness associated with the survival of the predominant tussock cover. These values are irreplaceable, but the terms of the covenant will not ensure that they will be protected long term. Over time repeated over-sowing and top-dressing combined with grazing, especially by cattle, will almost certainly modify the natural grassland character.
15. The current covenant terms, as proposed in the Preliminary Proposal, will not prevent increasing modification of the visual catchment. One of the chief risks is the development of a hard line halfway up the hillsides marking the edge of top-dressing and over-sowing with green below and brown above. The other risk is the incremental loss of tussock cover resulting from cattle grazing.
16. Inclusion of cattle grazing in the proposed covenant terms was surprising because when questioned about cattle grazing at the inspection one of the current lessees was adamant that Dunstan Downs “never has and never will” graze cattle.
17. To ensure the long-term protection of landscape values the terms of this extended covenant CC2 need to prevent incremental change, and preferably have the effect of enabling some recovery of tussock grassland vegetation.
18. The outcome sought is that vegetation on the covenanted freehold land is visually indistinguishable from tussock grasslands in the adjacent scenic reserve.
19. The Board does not support the freeholding of area CC2 if covenant terms allow over-sowing and top-dressing and grazing by cattle, particularly within the visual catchment of the highway. These covenant conditions are unlikely to achieve the visual outcome sought in the long term.
20. The Board can only support freeholding with a covenant which allows for light grazing by sheep only and topdressing for conservation management only. Effective monitoring will be needed.
21. The Board is also concerned by the inclusion within the covenant area CC2 of high-altitude lands on the flanks of Old Man Peak (1826m) which should probably be retired from grazing all together. In other parts of Dunstan Downs lands above 1,100masl were retired for water and soil conservation reasons. Possibly the absence of a retirement fence on these faces is the pragmatic reason the tops have been included in the grazing covenant, however the Board agrees that a boundary fence halfway up the slopes with intensified green pasture below and tawny tussocks above “would cause an unacceptable disruption to the landscape”.

22. The long-term effects of continued pastoral use on the indigenous biodiversity of the stable alpine screes on the upper levels of Old Man Peak are, in the Board's view, uncertain. Effective monitoring of the grazing covenant will be essential to ensure the outcome is "ecologically sustainable".
23. To recap, the Board is **strongly opposed** to these two conditions in the covenant terms for CC2 AND in the enabling of such management by freeholding in the land north to McLays Creek which the Board **recommends** should also be covenanted. This issue is too important to be settled pragmatically by making use of existing fence lines, if that was the reason for not including the natural threshold in the covenant.
24. Regarding the balance of the proposed freehold land (i.e. that unrestricted by covenants, about 1920ha) the Board agrees much of the land is highly modified.
25. Further down the Longslip valley the eastern boundary of the freehold area is defined by the existing retirement fence about 1100masl up the slope. Already the difference in management is visible along the fence line creating a very unnatural visual boundary between modified and natural character. This is likely to become even more marked with time when the land is freehold as proposed. The lessee advised the retirement fence is already over 15 years old.
26. The Board **recommends** consideration be given to relocating the eastern boundary of the freehold downslope and following a more natural boundary line with the construction of a new fence to be deferred until the retirement fence needs to be replaced. An interim grazing licence could be issued for land above the new legal boundary which would be included with the rest of the conservation area along the tops. Terms of the grazing licence would preferably prevent top dressing and over-sowing above the new legal boundary during the transitional period.
27. The Board notes and **supports** the public access easement qualification on the 2815ha area of proposed freehold (shown in green) which enables public foot and mountain bike access via a loop track and an associated car park. Without being able to inspect this area it is difficult to be certain, but the design and location of the track seems to have been intended to enable the public to view the special vegetation feature in CC1. It would certainly be of public interest, and such a track would probably be well used by the relatively high numbers of visitors who normally pass through Lindis Pass.
28. If area CC1 becomes conservation land, as recommended, an additional benefit would be that the walking track from State Highway 8 on the proposed easement across freehold land could be extended to pass through the valley floor shrublands.
29. The Board **fully supports** the qualification for a public access easement and also supports the easements in favour of Telecom for access to the pylons and for NZ Police access to telecommunications infrastructure on Old Man Peak.
30. Public use of these 4WD tracks for walking and mountain biking does not seem to present any safety risk greater than many other such tracks in other parts of Canterbury and Otago and the Board sees no good reason to restrict public access. The Board **supports** enabling non-motorised public access along the pylon track.

31. In the CMS the access outcome sought for conservation parks is *“Foot access is the predominant means of reaching all parts, but this is assisted and complemented by provision for vehicle...access”* (page 51, CMS). As it is likely public conservation lands coming out of the Dunstan Downs tenure review will end up as some sort of conservation park it is important that the access options remain open and tenure review decisions do not preclude public 4WD vehicle access in the future.

Canterbury Aoraki Conservation Board values the opportunity to contribute to the tenure review process for Dunstan Downs Pastoral Lease and appreciates the provision of a helicopter to facilitate inspection by its representative. The Board looks forward to reading your decision.

Yours sincerely



Paula Smith, Chairperson
Canterbury Aoraki Conservation Board
Te Rūnanga Papa Atawhai o Waitaha me Aoraki

Central Otago Environment Society [COES]

22 November 2020

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Submission to Proposed Tenure Review Dunstan Downs

1. The Central Otago Environmental Society (COES) is an incorporated society (Reg No CC20371) based in Central Otago
2. *Our primary aims are:*
 - The protection and preservation of the natural landscape and character of Central Otago. This covers many values including landscape, amenity, aesthetic and Central Otago's endemic flora and fauna.
 - Raising awareness of issues concerning the natural landscape, heritage and resources of Central Otago with the wider public.
 - To encourage and support the Government, the Central Otago District Council, the Otago Regional Council, the Department of Conservation and other statutory authorities as appropriate, to establish policies and make decisions which will preserve and enhance the special character of Central Otago's landscapes, heritage and resources for the benefits of future generations.
3. A number of our members have had personal experience in the Dunstan Creek catchment via walking, mountain biking and fishing and acknowledge the Innes Family for past access approval.
4. Representatives from our group were not able to make the public inspection but do understand from those that did, that there were concerns over the adequacy of the inspection and concerns have been expressed as a result about the ability to be properly informed and meaningfully contribute.
5. We have concerns about the outdated Conservation Resources Report (CRR), dated 2005. There appear to be gaps in the survey of native fish values and skinks which need to be completed along with a review with updated current Conservation Status of species that have been reviewed since these dated ecological values assessments referenced in the CRR.

6. COES endorses the Forest & Bird Southern Regional office submission to the Proposed Tenure Review Dunstan Downs. In particular in seeking the following decisions
- Retention of CA1 in full crown ownership amended as shown in this submission
 - Retention of CA 2 in full crown ownership
 - Retention of CA3 in full crown ownership
 - Retention of GC1 in full crown ownership with a grazing concession limited to 10 year non renewable concession for very light sheep only grazing, no burning, topdressing or oversowing
 - Retention of GC2 in full crown ownership with a grazing concession limited to 10 year non renewable concession for very light sheep only grazing, no burning, topdressing or oversowing
 - Retention of proposed covenants CC1 and CC2 full Crown ownership as Conservation Areas, subject to a non renewable 10 year concession for very light sheep only grazing, no burning, topdressing or oversowing.

Ecosystem Services & Carbon Zero Act

7. COES recommends that the Crown should be recognising and giving effect to ecosystem service (ref CICES Version 5.1. <https://cices.eu>) The ecosystem service contribution gained from planet saving carbon sequestration and water harvesting far outweighs any low value that pastoral farming contributes, especially when farm energy inputs, current and downstream environmental effects are accounted for when the pending economic implications of EROI are factored into account.
8. This land area is significant with it relatively light physical human footprint as it stands and into the future if managed regeneratively for conservation of its ecological biodiversity, landscape and recreation values, under the legal context for the Dunstan Downs Tenure Review

The Crown Pastoral Lands Act (CPLA) sets out the objects which the commissioner must take into account in developing a preliminary proposal.

The objects of this Part are 2—

(a) to—

- (i) promote the management of reviewable land in a way that is ecologically sustainable:
 - (ii) subject to subparagraph (i), enable reviewable land capable of economic use to be freed from the management constraints (direct and indirect) resulting from its tenure under reviewable instrument;
- 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 concerned to full Crown ownership and control; and
 - (c) subject to paragraphs (a) and (b), to make easier—
 - (i) the securing of public access to and enjoyment of reviewable land; and
 - (ii) the freehold disposal of reviewable land.
9. Along with objects of part 2 CPLA considered recognition of the immense and enduring ecosystem service capital contribution should be made and given effects along with the need to recognise the objectives and requirements of the Carbon Zero Act.
 10. If considered and implemented this could provide for carbon sequestration (soil and vegetation) and the collective catchments ability to capture, and store water of high quality with steady release.
 11. Our conservation areas are recognised and monitored as providing and supplying our highest quality and quantity of water resource.
 12. This is extremely pertinent to Central Otago and current to the Manuherekia Catchment water allocation and water quality issues associated with the Otago Regional Council and Environmental Protection Agency plan review. The water harvesting and water yield values of land returned to full conservation and vegetation and soil regeneration is only beginning to be recognised and appreciated.
 13. This tenure review is all about landscape continuity and ecological sequence and servicing and is a much more compelling and enduring ecosystem service resource contribution than pastoral farm economic gain.
 14. The existing and potential connections between; Landscapes, Ecological Sequences, Rivers, Forest Remnants and Regenerating Shrublands, are all at risk with ongoing grazing by cattle and sheep.

Proposed CA

15. We endorse the following Forest and Bird Southern Regional area statement “This lease has extensive significant inherent values (sivs) and recreational opportunities. It provides opportunities to extend Oteake Conservation Park and protect the head waters of Dunstan Creek, one of the most significant braided river valleys remaining largely intact in Central Otago. As noted in the CRR it is a property with considerable strategic and locational values being adjacent to existing conservation areas and linking to conservation areas extending to the main divide It is also significant as it is the linkage between the Waitaki and Central Otago Ecological regions. Much of it lies adjacent to one of New Zealand’s premier scenic roads. Given all of the values this lease should be a prime candidate for consideration for full crown purchase.
16. We also endorse the Forest and Bird Southern Regional area statement on the adequacy of alignment of the fence between FH2 and CA1. “The boundary has clearly been chosen to utilise the existing fence line, rather than to enable the protection of the sivs and promote ecologically sustainable management. The sivs are significant here as they are part of the much larger area that is contiguous with the proposed CA1, GC1, GC2 and CA3 to the south.

We understand the fence is not in particularly good condition, and is likely to require replacing in the near to mid-term. This is a good opportunity to find a more secure and landscape and ecologically sensitive alignment.

17. COES fully supports the return of CA2 to full Crown ownership as a conservation area. This area has outstanding sivs and full Crown ownership will enable their protection.

Proposed CC1

18. The Conservation Covenants CC1 should be returned to full Crown ownership and control in order to better protect the significance of this remnant as part of ecological and altitudinal succession from valley floor to ridge line.
19. Full return to Crown ownership would make easier the securing of public access to and enjoyment of the remnant forest

Proposed CC2

20. The Conservation Covenant CC2 should be returned to full Crown ownership and control to enable protection of extensive sivs and enhance public access. The conservation covenants as proposed would create disconnect between adjoining conservation areas, within this highly significant landscape and altitudinal ecological sequence.

If they remain

21. Amend the provisions of the Covenants to ensure that the values of the land to be protected include the full range of sivs.
22. Amend the monitoring prescription to require that the monitoring is carried out by the Department of Conservation and includes monitoring of key elements of the full range of sivs, not just vegetation. Costs to be met by the owner.

Public Access

23. This tenure review could result in an outstanding round tramping/biking (including e mountain bike) trip with opportunity for longer trips into Dunstan Creek, if public access was provided for along the Pylon Track, up the Zig Zag track in the proposed freehold area, along to Old Man peak and back down to the highway on the track through the adjacent public conservation land. This would be facilitated if CC2 was retained as a Conservation area with an easement through the adjacent proposed freehold.

Conclusion

24. As discussed above, omitted from this proposal is ecosystem service the vast environmental capital gains represented by ecological regeneration for the full altitudinal sequence from valley floor to mountain basin. The ecological contribution gained from planet saving carbon sequestration and water harvesting far outweighs any low value pastoral farming contribution, especially combined with the cumulative exports off the land when farm energy inputs, current and downstream environmental effects are accounted for.

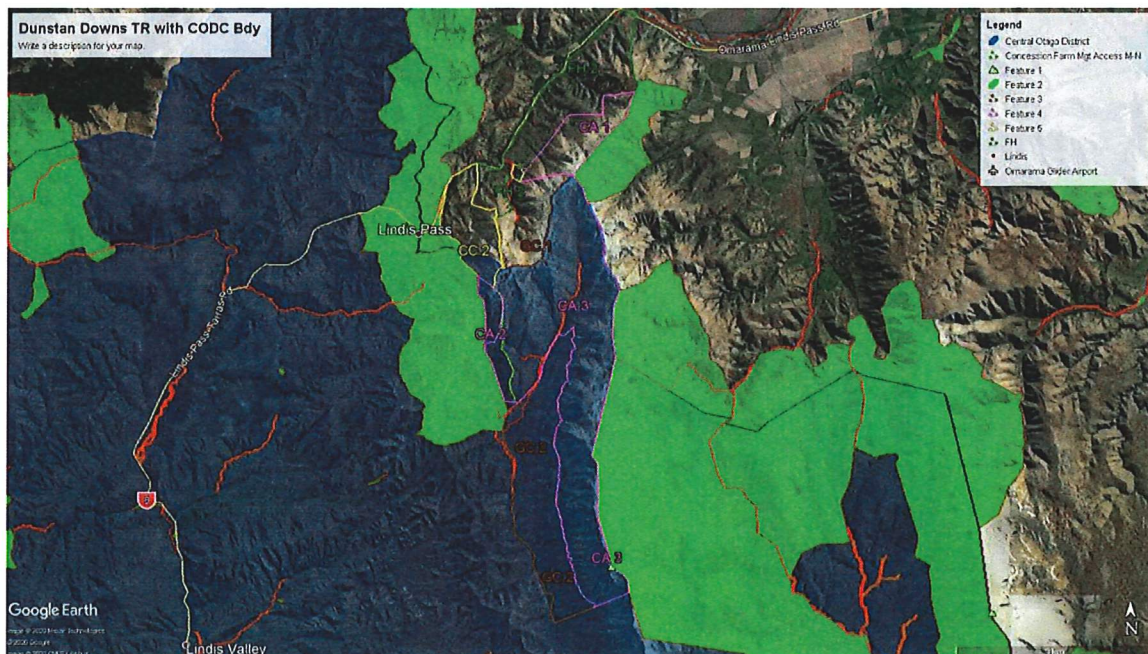
25. COES recommends recognition of the immense and enduring ecosystem service capital contribution should be made and should be given effect to along with the need to recognise the objectives and requirements of the Carbon Zero Act.

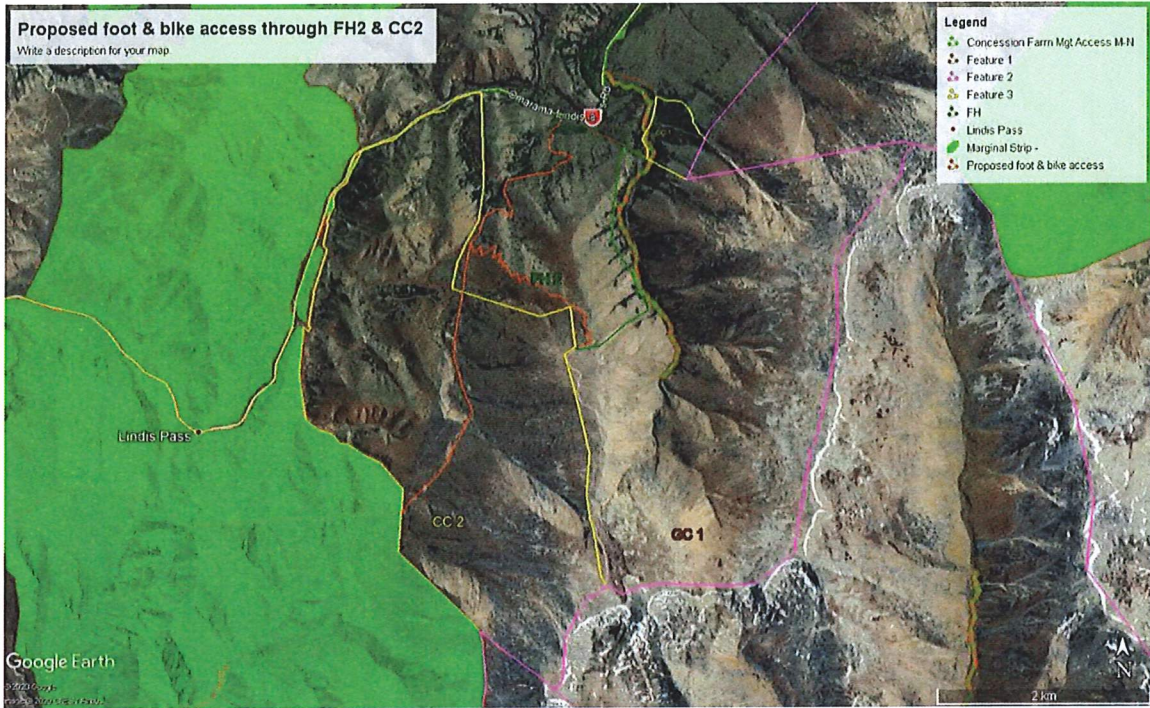
Thank you for the opportunity to comment and we would be pleased to have an opportunity to make our recommendations.

Yours sincerely

Matthew Sole

On behalf of Central Otago Environmental Society





From: [Christopher Pearson \(Surveying\)](#)
To: [pastoral & tenure review](#)
Subject: submission on Dunstan Downs Pastoral lease Tenure Review
Date: Tuesday, 24 November 2020 3:17:44 p.m.

To whom it may concern

I support the proposed Dunstan Downs Pastoral lease Tenure Review subject to the following recommendations.

Recommendations

The areas CA1, CA2 and CA3 in the designation plans be adopted as proposed.

These areas have high potential for tramping and cross-country skiing. It is adjacent to the Oteake Conservation Park providing a large, continuous area of conservation land. This area also includes the dramatic western faces and summit ridge of the St Bathans Range. Indeed the SW corner of CA3 is located at the Summit of Mt St Bathans.

CG1 and CG2 be adopted as proposed.

I support the use of temporary grazing permits to support the viability of the farming operations as a transitional arrangement. The period of 10 and 15 years seems reasonable.

CC2 be adopted as proposed with some provision for public access from the Lindis Pass reserve to the public conservation land associated with GC1/CA3.

Also some of the trig points on the St Bathans range are important monitoring points for crustal deformation studies. I would like to express the hope that future DOC management does not preclude access to these points by geodetic surveyors from Otago University and LINZ.

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Central Otago Recreational Users Forum (CORUF)

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24 November 2020

Commissioner of Crown Lands
Land Information New Zealand Crown Property
CBRE House, 112 Tuam Street
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CHRISTCHURCH 8140

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Submission from Central Otago Recreational Users Forum (CORUF) on the Preliminary Proposal for the tenure review of Dunstan Downs.

- 1a** Central Otago Recreational Users Forum, (CORUF), was set up in 2005 at the behest of the Department of Conservation. It represents some 60 groups and individuals with outdoor recreational interests on public land. All require reasonable access to give them a realistic opportunity to enjoy their chosen recreation which is often family orientated.
- 1b** Recreations enjoyed by our members include: walking, photography, biking, horse riding, tramping, orienteering, 4 x 4 drivers, hunting (game and birds), cross country skiing, dog sledging, snow-mobiling and fishing.
- 1c** CORUF, was set up to promote understanding and discussion between recreational users of public land in Central Otago, and the statutory managers of that land.
- 1d** In particular, the Forum
- promotes the enjoyment of Public Lands
 - gathers the views of user groups on public land management issues as they affect recreation, and represents those views to statutory managers
 - works with statutory land managers and others to promote understanding of issues of land management for recreation
 - minimizes conflict and promotes understanding between user groups
 - and develops an ethic of use compatible with the protection of special places.
- 1e** The New Zealand public wishing to recreate on public lands expect permanent access of a reasonable type to be negotiated by the government

department involved during Tenure Review as specified in the Crown Pastoral Lands Act (CPLA)

- 2 The designation of areas in this submission correlates with those on the map accompanying the Summary Preliminary Proposal (SPP)
- 3 We strongly support all the areas labelled CA1, CA2, CA3, GC1 and GC2 being retained by the Crown as part of the conservation estate.
- 4 Our concern is the extremely limited public access to that land.
 - 4a The only public access proposed is from a new carpark on State Highway 8 (point a) to point b.
 - 4b We note that this is limited to foot, horse, or non-motorised vehicle. Dogs will not be allowed.
 - 4c The proposal states that the Grantee “as a member of the public” may carry a gun over the easement It is unclear as to whether other hunters with a permit to hunt on conservation land, accessed by the easement can carry a gun.
 - 4d Recreational hunters will be able to assist in the control of pest animals, Goats, deer, pigs and wallabies, which will doubtless proliferate in the absence of grazing and pest control by the current land holder.
 - 4e **We submit that dogs should be permitted on the easement (a – b) to access public conservation land, provided they are on a lead and are subject to an adequate treatment for the prevention of sheep measles.**
 - 4f **We submit that that hunters who have a permit to hunt on conservation land accessed by the easement (a – b) may carry a gun over the easement.**
- 5a Even if these changes are implemented, the easement (a – b) does not give adequate access to the bulk of the conservation area, as the routes out of McLays creek are very limited. The only track out of McLays creek climbs 500metres in 1km (1:2), limiting its use to the very fit and agile. Potential routes off the track are even steeper.
- 5b Thus, we request further access options to be reconsidered.

- 5c** There is a track from State Highway 8, opposite Dalrachney station to a saddle between spot heights 1444 and 1464 on the Wether range. This crosses what is proposed as freehold land, but there is no reason why there should be interference with farming activity if there is adequate signage and fencing. This should be installed at the grantor's expense.
- 5d** **We propose that this track is established as an easement, allowing public access to the Killermont conservation and the conservation area designated CA.**
- 6a** Area CC2, coloured yellow on the plan, is designated as freehold land with conservation covenants.
- 6b** We submit that the ecological values listed in the Preliminary Proposal are sufficient for the area to be retained in crown ownership, with grazing concessions.
- 6c** We note and accept that the Morven Hills tenure review is totally separate to this review of Dunstan Downs. It is relevant, however, in that it has the potential to allow public access to the proposed Dunstan Downs conservation areas, in particular to Old Man Peak.
- 6d** We refer to the track running on the outside of the SW border of area CC2, SW along the pylon track for about 1km and then zig-zagging up the western face of Old Man Peak to enter the proposed conservation area CA2 to the south of the summit of Old Man Peak.
- 6d** **If there is adequate access up this track by foot, horse, bicycles, including E bikes and 4 x 4 vehicles, we can accept the proposals which prevent access over area CC2 and the green Freehold area. If it does not, we submit that an easement for public access, along the pylon access track and up to the ridge north of Old Man peak must be reconsidered.**

7 In summary we greatly appreciate the massive amount of work that all the various agencies have done in creating the Preliminary Proposal. We hope that our recommended amendments enable the best possible outcome for both recreation and conservation.

Yours faithfully

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