

Crown Pastoral Land Tenure Review

Lease name: GLENDENE

Lease number: PO 136

Public Submissions - Part 2

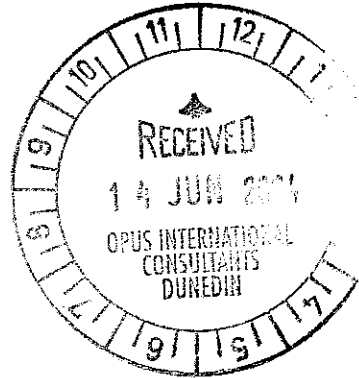
These submissions were received as a result of the public advertising of the Preliminary Proposal for Tenure Review.

December

05

13

Safari Excursions – Wild Flower Walks
41 Glencarron St
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10 June 2004

The Commissioner of Crown Lands
C/o Robin Whelan
Manager, Property
Opus International Consultants Ltd
144 Rattray Street
Private Bag 1913
DUNEDIN

Dear Sir

GLEN DENE LTD TENURE - REVIEW PRELIMINARY PROPOSAL

Thank you for a copy of this preliminary proposal. I would be pleased if you would accept this submission.

I run a tour operation business and wild flower walks that covers the Central Otago area. Though the Lake Wanaka / Lake Hawea area does fall directly into this area for visiting, its only on the fringe of my operations, the Glen Dene land has significant landscape values that require to be protected, provide a chance for native flora to regenerate thus allow for increase in fauna that will overall increase the recreation values for the region.

Of all reviews that I have been involved in and made submissions on so far, this particular is not a great proposals in terms of outcomes for public recreation, protection of the lakeside and those travelling along State Highway 6 to appreciate the wonderful scenery.

THE PROPOSAL

The proposal involves the creation of a new conservation area (1931) ha that will run almost the lakeshore to lakeshore over the southern end of the pastoral lease. This is marked as CA 3 on the map on the "Summary of the Preliminary Proposal – sheet 1 of 2". Approximately 5,902 ha are proposed for freeholding of which 1,406ha is to be covered by a fairly weak covenant. There are some other small 1 and 6 ha reserves proposed.

KEY ISSUES

1. A Covenant is needed to protect the landscape and regenerating shrublands and tall tussock lands on the Lake Wanaka Faces. Under the proposal this entire stretch of land fronting the lake is to be freeholded with no protective covenant.
2. The proposal fails to provide practical and adequate access up to the Dinner Creek track, to enable people to climb Isthmus Creek or traverse the ridge to Mr Burke.
3. Most of the land below the State Highway and Lake Hawea is to be freeholded with only 2 very small reserves proposed.
4. The proposed reserve at the Neck will not protect the catchment of wetlands, and does not reach the lakeshore.

West Wanaka Faces – Proposed Free-Holding Contrary to CPLA

Freeholding of almost the entire Lake Wanaka Faces, up to the skyline to adjoin CC1, with no protective mechanism is contrary to the CPLA as it contains extensive and very significant landscape values, which qualify as significant inherent values under the CPLA.

I ask that this area only be freeholded if there is a **meaningful covenant** that prohibits the destruction or damage of the regenerating native plants, and protects the open space landscape is achieved.

The Conservation Resource Report (CRR) refers to these as highly significant in terms of Lake Wanaka landscape being- rugged and dramatic landforms, boulder filled streams with regenerating shrublands, remnant beech trees. Apart from being repeatedly burnt, there are few obvious structures, no tracks and few fences.

In absence of burning the lake faces will regenerate, and will greatly enhance the landscape catchment of the Lake. The CRR describes that there are a mass of native shrub seedlings amongst the bracken, areas not burnt for 20 years or more support vigorously regenerating shrublands with the beginnings of a manuka, kohuhu (*Pittosporum tenuifolium*), broadleaf and lance wood forest.

Very little of the land surrounding Lake Wanaka is protected.

The Lake Faces meet the criteria used by DOC to determine significant inherent values that deserve to be protected under the CPLA ie;

It is an area that in its entirety sustains the special natural quality and integrity of the high country landscape, being a backdrop to a very significant landscape – Lake Wanaka. These faces are very visible from the Lake, and from the Island Mowhaou, which is becoming a popular tourist spot and destination for locals.

The Wanaka Faces contributes to the recreational and scenic setting of one of New Zealand's culturally valued recreational lakes and lake/high country landscapes. As the PDR reports for recreational users and for Wanaka tourism there is substantial

justification for ensuring the continuation of the natural regeneration process and enhancement of the lower shrublands and forest remnants.

The Lake Wanaka Faces make a special and an important contribution to the overall quality, natural functioning and ecological integrity of Lake Wanaka, and its marginal strip both in their present and in their future state.

The Neck

The proposed reserve that is more or less confined to the wetlands, and does not protect a buffer zone or the landscape setting that provides the glacial context for the wetlands.

The area appears to be covered predominantly in bracken, which is the beginning of natural regeneration, and it is abundantly obvious from the surrounding vegetation that if not burnt, or cleared, this area will naturally regenerate into a native forest.

In order to adequately protect the glacial setting of the wetlands the reserve must be extended to the lake margin and include the catchment of the wetlands, by going up to the sky line by the pylons.

This entire area meets the tests for significant inherent values under the CPLA.

It is an area that in its entirety sustains the special natural quality and integrity of the high country landscape, being a backdrop to a very significant landscape, ecologically important wetlands and a cultural feature – Lake Wanaka. The faces behind the wetlands are very visible from State Highway 6.

The Neck catchment contributes to the recreational and scenic setting of one of New Zealand's culturally valued recreational lakes and lake/high country landscapes, and scenic highways.

The Neck catchment makes a special and an important contribution to the overall quality, natural functioning and ecological integrity of Lake Wanaka, and its marginal strip both in their present and in their future state.

Protection of lakeshore between Lake Hawea and the State Highway

The Crown should not be freeholding lakeshore land. There are areas of native shrublands, which in the absence of grazing would quickly expand. CA2 should be extended north along the Lake edge to the yards at Dinner Creek.

1ha Lakeside Reserve

This tiny reserve is absurd, and mean spirited, particularly with the insistence that there be no fires or camping. It is an ideal place for picnics, where people should be able to light a small fire to boil a billy or cook tea in a constructed fire place provided it is not in the closed fire season.

The 1ha reserve should be extended to include all the land between the State Highway 6 and the Lakeshore from the Neck to the headland marked by Trig 10781. This land has an indigenous component and is partly visible from the

State Highway 6 and the Hunter Valley Road as well as from Lake Hawea. It has significant inherent landscape values.

ACCESS EASEMENTS

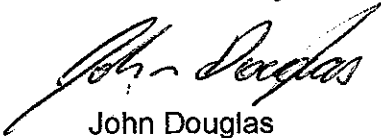
Public i-e-f-g up to Isthmus Creek via part of the Dinner Creek Track and along to Mt Burke

My greatest concern with this easement is the portion i to e, which is part of the public access route i-e-f-g. This is different to the route for management purposes, which follows the formed track beginning at d then goes to e. The public bit, i-e is up a steep ridge further to the north and is impractical for public access, this includes both walking and mountain bike access, as here there is no formed track.

I ask that the tenure review not proceed until practical secure public access for both mountain bikes and walkers to the base of the Dinner Creek track is provided.

I thank you for the opportunity to make this submission.

Yours faithfully



John Douglas
Manager

Web Site www.wildflowerwalks.co.nz

Robin Whelan

From: Russell Braddock [russboy@xtra.co.nz]
Sent: Sunday, 13 June 2004 17:36
To: Robin.Whelan@opus.co.nz
Cc: wanakabike@yahoo.com
Subject: Tenure review Glendene Station

I do not support the tenure review of Glendene Station in it's present format as it does not give feasible or realistic public access to the the tracks along the tops to Mt Burke. The existing access route up Dinner Creek is to be closed to the public which in effect is closing off the range to all users except for the existing run holder as that particular person has the only feasible access to the upper part of the range. This has been a pattern with recent tenure reviews in that public access has been up steep and impractical tracks while the run holder retains not only the good land in free hold title but also the only reasonable access to the high country tops. The purpose of tenure review is therefore not achieved in that the public dose not have reasonable access.

50 ✓

The tenure review proposal for Glendene Station needs to be changed to allow easier and more reasonable access to the proposed addition to the conservation estate.

Yours Faithfully

Russell Braddock
33 Bernard Road
Albertown
Wanaka
Ph 03 443 4621

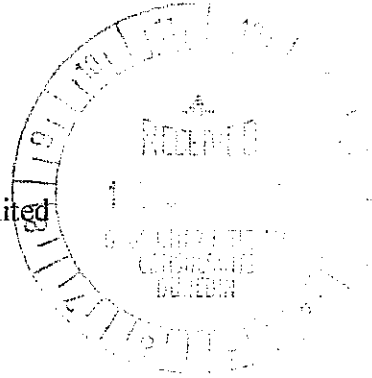
(18)



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

10 June 2004

The Commissioner of Crown Lands
C/- Opus International Consultants Limited
Private Bag 1913,
DUNEDIN.



Dear Sir,

Re: Preliminary Proposal for Tenure Review: Glen Dene Pastoral Lease

I write on behalf of Federated Mountain Clubs of NZ Inc. (FMC) which represents some 15,000 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, 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 recently stated 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.*

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

FMC appreciates this opportunity to comment on the Preliminary Proposal for the review of Glen Dene pastoral lease.

The Preliminary Proposal

FMC notes that the proposal includes the following designations:-

1. 1,931ha (approximately) to be designated as land to be restored to or retained in full Crown ownership and control as conservation area under section 35(2)(a)(i) CPL Act 1998.
2. 6ha (approximately) to be designated as land to be restored to or retained in Crown control as conservation area under section 35(2)(b)(i) CPL Act 1998 subject to the following concession:
Concession: A stock droving access easement from SH 6 across proposed conservation area to the shore of Lake Hawea.
3. 1ha (approximately) to be designated as land to be restored to or retained in full Crown ownership and control as reserve under section 35(2)(a)(ii) CPL Act 1998.
4. 5902ha (approximately) to be designated as land to be disposed by freehold disposal to the holder (under section 35(3) CPL Act 1998) subject to Part IVA Conservation Act 1987, Section 11 Crown Minerals Act 1991, and the following protective mechanisms pursuant to section 40(1)(b) CPL Act 1998.

Protective Mechanisms

Two combined public access and vehicles for management purposes easements to provide access from SH 6 to proposed conservation area.

A public access easement from a combined public access and vehicles for management purposes easement to Isthmus Peak.

A public access easement from SH 6 to Lake Hawea.

Conservation Covenant covering 1408ha (approximately) mechanism pursuant to sections 40(1)(b) and 40(2)(a) CPL Act 1998.

Conservation Covenant covering 6ha (approximately) mechanism pursuant to sections 40(1)(b) and 40(2)(a) CPL Act 1998.

FMC Submissions

You will recall that following the 'Early Warning Meeting,' FMC provided a Report in May 2001 entitled "Preliminary Report on the Recreational and Related Significant Inherent Values of Glen Dene". We are now pleased to note that some of the recommendations made in that report have been incorporated into the Preliminary Proposal for the tenure review of Glen Dene, particularly those recommendations related to public access. We are however, very disappointed that the proposal falls a long way short of our recommendations with respect to the protection of significant inherent values, and is also deficient with respect to public access. We note too, that the Preliminary Proposal also falls a long way short of the indicative outcomes signalled in the LINZ Scoping Report and the Proposed Designations Report and largely overlooks the recommendations of the Conservation Resources Report. This would seem to indicate a systematic failure in the tenure review process.

In fact, the deficiencies in the Preliminary Proposal are so great and so divergent from the Proposed Designations Report that the Preliminary Proposal is quite unacceptable in its present form. We would expect to see a major shift in the terms of the proposal when the Substantive Proposal is formulated. If this does not happen we believe that the Commissioner for Crown Lands should withdraw from the Review.

The details of FMC concerns about, and objections to, the Preliminary Proposal are presented below and are arranged in the same format as the Preliminary Proposal quoted above.

Preliminary Proposal, Item 1.

1,931ha (approximately) to be designated as land to be restored to or retained in full Crown ownership and control as conservation area under section 35(2)(a)(i) CPL Act 1998.

We applaud the proposal that 1,931ha (CA1, and CA3) be restored to full Crown ownership and control as Conservation Area. We understand that the proposed area consists of CA1 (6ha wetlands at the Neck), and CA3 (1925ha from Mt Burke on the Lake Hawea side of the property, over the range crest, and down the Lake Wanaka faces to Lake Wanaka) However, we note that in the Proposed Designations Report some 2,700ha in Mt Burke Creek, Long Valley Creek, Craig Burn and Dinner Creek catchments were recommended as land to be restored to or retained in Crown control. It appears that a large area in excess of 1,000ha (mainly in the catchments of the Long Valley Creek, Craig Burn and Dinner Creek) have been excluded from CA3 in the Preliminary Proposal despite the justifications given in the Proposed Designations Report.

The Proposed Designations Report noted the following:-

With respect to the inherent values in the catchments of the three creeks cited above:

- Is an area which sustains the special natural quality and integrity of the High Country landscape especially the indigenous component.
- Is an area which sustains the most culturally valued attributes and their context within a natural High Country landscape.
- Is an area which currently meets the PNAP criteria for selection as a priority natural area for protection or special wildlife significance ranking as "outstanding" to "moderate/high".
- Includes type localities and habitats of species and communities which are at their distributional limits and/or endemic or which have specialised habitat requirement in the High Country and species, communities, habitats or ecosystems which are uncommon and/or endemic in the Ecological District.
- Is a habitat of a threatened species.
- Is an area which makes a special contribution to the overall quality, natural functioning and ecological integrity of significant value.
- Is a setting of high natural or historical value for outdoor recreational opportunities in the High Country.

From a recreational perspective the area is outstanding. The Proposed Designations Report states that:

- *“The area offers high quality recreational opportunities in a spectacular natural setting. Given it's close proximity to Wanaka and Hawea the proposed conservation area has potential to be very popular if public access is formalised. Key recreational activities are likely to be tramping, mountain biking, hunting and four wheel drive excursions along the ridge crest via Dinner Creek (vehicle use of access tracks will remain at the discretion of the landowner). The area has potential for magnificent day walks.”*

However, there appears to be a problem of practicable access up the Mt Burke Creek gorge above point c to which public access is provided by easement a-b-c. Access would be much improved if the narrow tongue of CA3 were widened northwards to include the adjoining ridge on the true left of Mt Burke Creek.

FMC submission:

FMC submits that on the basis of all the reasons provided in the Proposed Designations Report, that the entire area of 2,700ha in the catchments of Mt Burke Creek, Long Valley Creek, Craig Burn and Dinner Creek should be returned to full Crown ownership and control in order to meet the objectives of the CPL Act 1998, and the recently declared government objectives for the South Island high country, especially those objectives set out as 5 bullet points in the introduction to this letter (page 1).

FMC recommends that the narrow tongue of CA3 in the vicinity of Mt Burke Creek gorge should be widened northwards to include the adjoining E-W ridge thus permitting much more practicable public access to the higher parts of the Conservation Area.

The Proposed Designations Report also noted the following:-

With respect to the wetlands at the Neck the following features were identified:

- Is an area which sustains the special natural quality and integrity of the High Country landscape especially the indigenous component.
- Is an area which sustains the most culturally valued attributes and their context within a natural High Country landscape.
- Is an area which currently meets the PNAP criteria for selection as a priority natural area for protection or special wildlife significance ranking as “outstanding” to “moderate/high”
- Type localities and habitats of species and communities which are at their distributional limits and/or endemic or which have specialised habitat requirement in the High Country and species, communities, habitats or ecosystems which are uncommon and/or endemic in the Ecological District.
- Is an area which makes a special contribution to the overall quality, natural functioning and ecological integrity of significant value.

Despite these outstanding natural values the area recommended for return to full Crown ownership and control in the Preliminary Proposal is only 6ha compared with the 10ha identified in the Proposed Designations Report. The protected area should be extended to include as much as possible of the striking bed-rock controlled glaciated landscape which is also the catchment which feeds the wetlands and is so prominent when seen by tourists travelling to Wanaka and Queenstown on the Haast Heritage Highway (SH 6). This area is illustrated in Fig. 1.

FMC submission:

FMC submits that on the basis of all the reasons provided in the Proposed Designations Report, the full 10ha recommended for protection should be returned to full Crown ownership and control in order to meet the objectives of the CPL Act 1998, and the recently declared government objectives for the South Island high country, especially those objectives set out as 5 bullet points in the introduction to this letter (page 1). This area should include striking bed-rock controlled glaciated landscape which is also the catchment which feeds the wetlands.

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Preliminary Proposal, Item 2.

6ha (approximately) to be designated as land to be restored to or retained in Crown control as conservation area under section 35(2)(b)(i) CPL Act 1998 subject to a stock droving concession:

FMC is pleased to note the proposal that 6ha (CA2) is to be restored to Crown control as conservation area subject to qualifications.

We note that the Proposed Designations Report identified the following:

- Is an area which sustains the special natural quality and integrity of the High Country landscape especially the indigenous component.
- Is an area which makes a special contribution to the overall quality, natural functioning and ecological integrity of significant value.
- Is a setting of high natural or historical value for outdoor recreational opportunities in the High Country.

FMC submission:

FMC agrees that on the basis of the reasons provided in the Proposed Designations Report, that the proposed 6ha area near the mouth of the Craig Burn should be restored to Crown control as conservation area subject to qualifications. FMC has no objection to the proposed concession for stock droving.

53 ✓

Preliminary Proposal, Item 3.

1ha (approximately) to be designated as land to be restored to or retained in full Crown ownership and control as reserve under section 35(2)(a)(ii) CPL Act 1998.

FMC accepts and applauds the principle that an area of land at The Neck on the Lake Hawea side of the road is proposed as a recreation reserve for public enjoyment and protection of the natural environment. We do consider however, that for this purpose to be fulfilled, the proposed area of only one hectare is too small. This should be extended south-east to include the narrow strip of land between SH 6 and the lakeshore.

FMC submission:

FMC submits that the proposed area is too small to fulfil the functions of a recreation reserve at such a popular location and asks that the size be reviewed with a view to increasing the area available to the public. The should be extended south-east to include the narrow strip of land between SH 6 and the lakeshore.

12 ✓

Preliminary Proposal, Item 4.

5902ha (approximately) to be designated as land to be disposed by freehold disposal to the holder under section 35(3) CPL Act 1998 subject to Part IVA Conservation Act 1987, Section 11 Crown Minerals Act 1991, and the following protective mechanisms pursuant to section 40(1)(b) CPL Act 1998.

FMC is strongly opposed to the freeholding of such a large area of Glen Dene pastoral lease for the following reasons:

(a) A significant part of this area cannot be managed in a way that is ecologically sustainable and does not therefore meet the CPL Act objective to promote the management of reviewable land in a way that is ecologically sustainable. In the FMC Report of May 2001, it was explained why this area consisting of mainly LUC Class VII land above about 1,000m cannot be managed sustainably unless nutrient balance is maintained.

(b) The proposed area contains a large area of land in the Long Valley Creek, Craig Burn, and Dinner Creek catchments which have significant inherent values identified in the Proposed Designations Report and which were recommended to be returned to full Crown ownership. It is unacceptable that these recommendations are not implemented. The key points in the justification in the Proposed Designations Report are listed as 7 bullet points in the section referring to Preliminary Proposal Item 1 above.

(c) The proposal is contrary to indications given in the LINZ Scoping Report and also contrary to the recommendations made in the Proposed Designations Report.

FMC submission:

FMC submits that the proposed freehold area should be reduced in size and that the entire area with significant inherent values in the Long Valley Creek, Craig Burn and Dinner Creek catchments should be returned to full Crown ownership as recommended in the Proposed Designations Report.

2. ✓
511

Proposed Protection Mechanisms (over the land proposed for freeholding)

We note that the Preliminary Proposal includes a designation for the disposal of almost 6,000ha by freehold disposal to the holder. We further note that this freehold disposal is subject to a number of protection mechanisms. Some of these are of concern to FMC and we discuss these below and submit certain recommendations which relate to the CPL Act 1998 and the declared government objectives for the South Island High Country [EDC Min (03) 5/3; CAB Min (03) 11/5 refer].

The Proposed Protection Mechanisms are as follows:-

1. Two combined public access and vehicles for management purposes easements to provide access from SH 6 to proposed conservation area.
2. A public access easement from a combined public access and vehicles for management purposes easement to Isthmus Peak.
3. A public access easement from SH 6 to Lake Hawea.

4. Conservation Covenant covering 1408ha (approximately) mechanism pursuant to sections 40(1)(b) and 40(2)(a) CPL Act 1998.

5. Conservation Covenant covering 6ha (approximately) mechanism pursuant to sections 40(1)(b) and 40(2)(a) CPL Act 1998.

Protection Proposal 1. FMC supports parts of the proposal that 2 combined public access and vehicles for management easements be provided between SH 6 and the proposed conservation area. FMC strongly supports the proposal for public access along the skyline ridge, f-g (Fig. 2).

The first of these easements (shown as d-e and e-f-g on the plan) provides management vehicle access while the alternative route (shown i-e and e-f-g on the plan) provides public access for foot and mountain bike use. There is no problem with e-f-g except that parts of this easement may become unnecessary if part or all of Covenant Area CC1 becomes conservation land after consideration of public submissions. FMC is not convinced that alternative route i-e is a feasible route for mountain bike use. This might have been able to be confirmed if access to inspect the property had been granted. As it is, we recommend that the public access route should be the same as the management easement over the route d-e. The rationale for this is not only that the route i-e may be impractical, but also that the legal road to Trig M was clearly intended to provide public access up the Dinner Creek catchment to the ridgeline. The legal road approximates to the line of an existing farm track which should therefore be recognised as the legal road through this tenure review. Furthermore the existing legal road needs to be extended to connect with SH 6 which has been realigned in recent times. There is an alternative that a track following the route i-e could be cut to mountain bike standard as a condition of this tenure review.

The second easement (shown as a-b-c on the plan) provides management vehicle access over a-b-c and public foot, bike and vehicle access over a-b to the car park at b, with public foot access available over b-c. FMC supports this part of the proposal.

FMC submission:

FMC strongly supports the proposal for public access along the skyline ridge, f-g (Fig. 2). FMC submits that the proposed route i-e may be impractical for mountain bike use. The legal road to Trig M was clearly intended to provide public access up the Dinner Creek catchment to the ridgeline and therefore the existing track (to which it approximates) should be recognised as the legal road through this tenure review. This legal road should also be extended to connect with the present alignment of SH 6. Alternatively (but only if this is practicable and we have been unable to check) a formed track following the route i-e should be cut to a standard suitable for mountain bike use. This to be formed as part of the tenure review agreement. We understand that there is a precedent for this to be done under the CPLA Act 1998 as in the case of Dingleburn Station where extensive track cutting for mountain bike use has been proposed as a condition of the tenure review agreement. FMC supports the proposal for the route a-b-c and the provision of a car park at b.

54-1 ✓
54-2 ✓
54-3 ✓
54-4 ✓

Protection Proposal 2. There is considerable confusion in the Preliminary Proposal because in Section 3 (Description of the proposed designations) this proposed access is referred to (in section 3.4) under the heading 'Easements' as both 'Public Access Easement Two' and later on in the same section as 'Easement 4 in Appendix 4'. FMC interprets this confusion to mean the route marked on the plan as f-h.

FMC supports the proposal that public access for foot and mountain bike use will become available from the proposed easement (e-f-g) to Isthmus Peak over the route marked on the plan as f-h (Fig. 2). We note that this easement appears to be subject to closure from 20 November to 20 December but this would seem to be totally unnecessary as none of the activities – lambing, fawning or calving are likely to be taking place along the ridgeline above 1,300m. FMC strongly supports the proposal for public foot and mountain bike access both along the ridgeline (f-g) and the extension to Isthmus Peak (f-h) illustrated in Fig. 2.

FMC submission:

FMC supports the establishment of an easement for foot and mountain bike over the route marked f-g on the plan, but submits that the closure period is totally unnecessary for the reason given above.

54-1 ✓
54-5 ✓

Protection Proposal 3. This proposal appears to refer to a public access easement from SH 6 to Lake Hawea which in section 3.4 of the proposal is also referred to as Public Access Easement One and Easement 3 in Appendix 4 and is shown on the plan as j-j1.

Despite the confusion created in the proposal document, we interpret this as meaning the proposed access from SH 6 to the shore of Lake Hawea at a point about one km south of the yards near the mouth of Dinner Creek. While FMC supports the provision of public access at this point, we believe that it is much more important to provide public access to a bay (locally known as Bum Bay) about one km north of the yards at the mouth of Dinner Creek. This is extremely valuable to the public as it is about the only beach on the western shore of Lake Hawea that is sheltered from the prevailing and frequently severe nor-west wind. This bay is illustrated in Fig. 3 where FMC recommends that a small Recreation Reserve should be designated for use by boat users and picnickers who have walked down to the beach from SH 6.

FMC submission:

FMC supports the establishment of an easement for public access from SH 6 to the shore of Lake Hawea over the route marked j-j1 on the plan, but submits that it is more important to provide public access down the side of the paddock following the fenceline to the beach at Bum Bay. FMC considers that a small Recreation Reserve should be created at the beach at Bum Bay to cater for use by boat users and family picnickers.

55 ✓
40-1

Protection Proposal 4. FMC notes that some 1408ha are proposed to be protected under a Conservation Covenant within the proposed freehold area. According to the Conservation Resources report and the Proposed Designations Report this area contains significant regenerating scrub and bush along the lower parts of the Lake Hawea faces, while there is also more mature shrubland/forest located on the steep slopes of the catchments of Dinner Creek and other unnamed creeks towards the northern end of the property. We note that the stated objective of the Covenant is “to preserve the values” and that this area was recommended for return to full Crown ownership. FMC asserts that this should be the outcome of this tenure review.

FMC supports the proposal that the values in the catchments at the northern end of the pastoral lease (including Halls Creek, Stewart Creek and several unnamed gullies) should be protected by Conservation Covenant as indicated in the Preliminary Proposal.

FMC submission:

FMC believes that the proposed large Covenant over some 1400ha is unnecessary as this area should be returned to full Crown ownership as recommended in the Proposed Designations Report.

2.

26.1 ✓

Instead, FMC submits that the entire Lake Wanaka face between Conservation Areas CA1 and CA3 from the shoreline to the ridge crest should be protected under a Conservation Covenant to allow recovery of native vegetation and to provide protection over an area of outstanding natural landscape. (See Figs 4, 5 and 6, and our submissions under the heading Protection Proposal 5).

35 ✓

Notwithstanding the above, FMC does support the proposal that the values in the catchments of Halls Creek, Stewart Creek and several unnamed gullies in the same vicinity, should be protected by Conservation Covenant as indicated in the Preliminary Proposal.

2.

100.2 ✓

Protection Proposal 5. FMC notes that it is proposed to designate a Conservation Covenant covering 6ha along the lower portion of the Lake Wanaka faces adjoining Lake Wanaka for some 2.5km north of CA3. FMC believes that this token area is totally inadequate to protect the natural and landscape values of the Wanaka Lake faces.

The Preliminary Proposal is to freehold the entire area along the Lake Wanaka faces between proposed Conservation Areas CA1 and CA3, from lakeshore to ridge crest, with the sole exception of the narrow strip along the shoreline, extending north from CA3 for some 2.5km. This proposal ignores the values described in the Conservation Resources Report and the indications given in the LINZ Scoping Report. That Report suggested that the entire Wanaka face should be protected under a Conservation Covenant. The Preliminary Proposal is inconsistent in that it is proposed that some 4km of the lake face north from the Mt Burke boundary, and stretching from the lakeshore to the ridgeline north of Mt Burke should be returned to full Crown ownership and protection while there is no proposed protection for the remainder of the lake face. This is despite the recognition in the Conservation Resources Report of (a) significant natural landscape over the entire face, (b) native shrublands/brackenlands with significant native shrub component along a band several hundred metres wide along the lower faces, (c) tall tussocklands along the upper slopes and (d) at least 7 small catchments containing native beech forest remnants.

Our own observations (from Lake Wanaka) suggest that the values associated with native shrublands and beech forest remnants, and their potential for ecological recovery, are actually higher along the main part of the face (Fig. 4) than within the proposed Conservation Area CA 3 (Fig.5). It should also be noted that the landscape and recreational values of the tussocklands and high basins along the lake face are also very high (Figs. 2 and 6) and superior to the severely eroded upper catchment of Stony Creek within CA 3 (Fig 5). It must be concluded that if the values within CA3 deserve protection, then so do the values of the entire lake face. Accordingly we recommend that the entire Lake Wanaka face from shoreline to ridge crest between CA1 and CA3 should be protected under a Conservation Covenant.

FMC submission:

FMC submits that the entire Lake Wanaka face between Conservation Areas CA1 and CA3 from the shoreline to the ridge crest should be protected under a Conservation Covenant. Such protection would allow recovery of native vegetation and would provide protection over an area of high recreation value along the upper tussock slopes, and over the outstanding natural landscape along the entire lake face.

35
✓**Conclusion**

Although FMC recognises that some of the recommendations made in our Report of May 2001 have been incorporated in this Preliminary Proposal, it still does not constitute what we consider would be an acceptable outcome.

We note that the Preliminary Proposal falls a long way short of the indicative outcomes signalled in the LINZ Scoping Report and the Proposed Designations Report and largely overlooks the recommendations of the Conservation Resources Report. This would seem to indicate a systematic failure in the tenure review process. In fact, the deficiencies in the Preliminary Proposal are so great and so divergent from the Proposed Designations Report that the Preliminary Proposal is quite unacceptable in its present form. FMC would expect to see a major shift in the terms of the proposal when the Substantive Proposal is formulated. If this does not happen, we believe that the Commissioner for Crown Lands should withdraw from the Review.

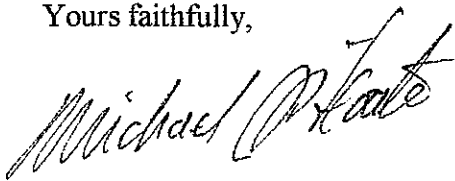
FMC submissions have been set out in this letter in the same format as the Preliminary Proposal for the tenure review of Glen Dene. Under each of the four main Proposal Items we have summarised our recommendations under a subheading '*FMC Submission*'. Similarly, we have set out our recommendations under a corresponding heading with respect to each of the five proposed Protective Mechanisms.

FMC believes that if these submissions are accepted and acted upon, the review would then be in accord with the Crown Pastoral Land Act 1998, and would assist in achieving the objectives stated both in that Act and the more recently declared government objectives for the South Island high country.

FMC believes that the outcomes of this tenure review could materially assist in achieving important objectives and priorities for the Hawea – Lindis Special Place declared in the Conservation Management Strategy for Otago.

We thank you for this opportunity to comment on the Preliminary Proposal for the review of Glen Dene Station. We regret that the lessees chose not to permit an onsite inspection of this property as this has obstructed a fully honest and transparent review process. Furthermore, it has prevented FMC being able to check out certain proposals and values which are referred to in the DOC and LINZ documents which are part of the Tenure Review process.

Yours faithfully,



BP Barbara Marshall
Secretary, Federated Mountain Clubs of NZ, Inc.

Appended Figures:-

Fig. 1 The Proposed Designations Report identified an area of 10ha around and including the wetlands near the Neck. The outstanding natural values of the wetlands and the striking bed-rock controlled glaciated landscape which drains into the wetlands are all highly visible from the Haast Heritage Highway, and deserve protection by return to full Crown ownership and control.

Fig. 2 This view shows Isthmus Peak at the left, and the skyline ridge between Isthmus Peak and Mt Burke, which will provide an outstanding mountain bike experience with spectacular views west to the Minaret Peaks and Mount Aspiring national Park, and east over Lake Hawea to Corner Peak, Dingle Peak, Breast Hill and Grandview Mountain and beyond. It is not easy to think of anywhere with higher recreation value than this. FMC strongly supports this proposal.

Fig. 3 While FMC supports the provision of public access over j-j1 south of Dinner Creek, it is much more important to provide public access to a bay (locally known as Bum Bay) about one km north of the yards at the mouth of Dinner Creek. This is extremely valuable to the public as it is about the only beach on the western shore of Lake Hawea that is sheltered from the prevailing and frequently severe nor-west wind. An area here should be designated Recreation Reserve with foot access from SH 6.

Fig. 4 Our observations from Lake Wanaka suggest that the values associated with native shrublands and beech forest remnants, and their potential for ecological recovery are actually higher along the main part of the lake face than within the proposed Conservation Area CA 3. It seems logical that if the values within CA3 deserve protection, then so do the values of the entire lake face.

Fig. 5 The natural values within CA 3 are reduced by relatively recent burning which has destroyed shrublands and cabbage trees on the front faces, and by severe erosion in the upper catchment of Stony Creek. The result is that the natural values within CA 3 are less than the natural and landscape value of most of the remainder of the Lake Wanaka face. Accordingly FMC recommends that the entire Lake Wanaka face from shoreline to ridge crest from CA1 to CA3 should be protected under a Conservation Covenant.

Fig. 6 As well as the natural value of the shrublands and beech forest remnants along the lake face there are superb high level basins within the tall tussocklands and the landscape value of the entire face was recognised as outstanding in the Conservation Resources Report. These features all add to the case for protecting the entire lake face.

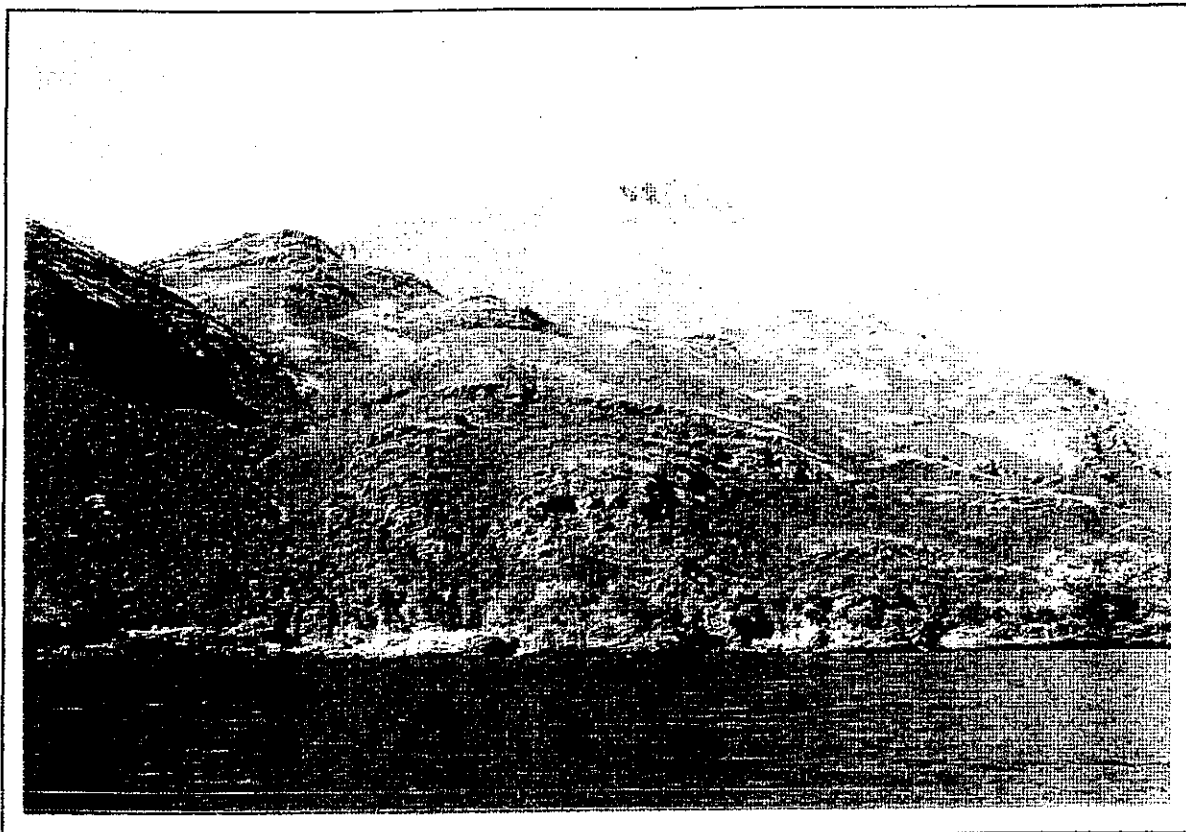


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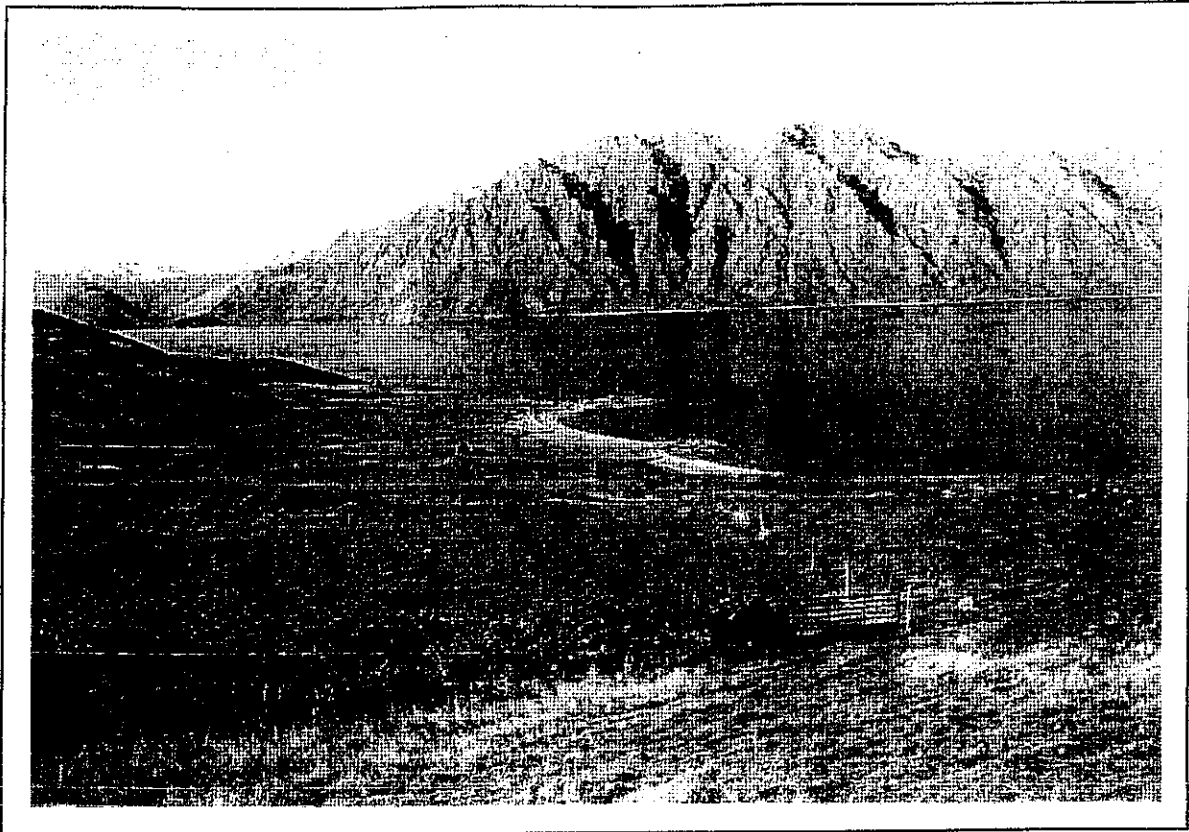


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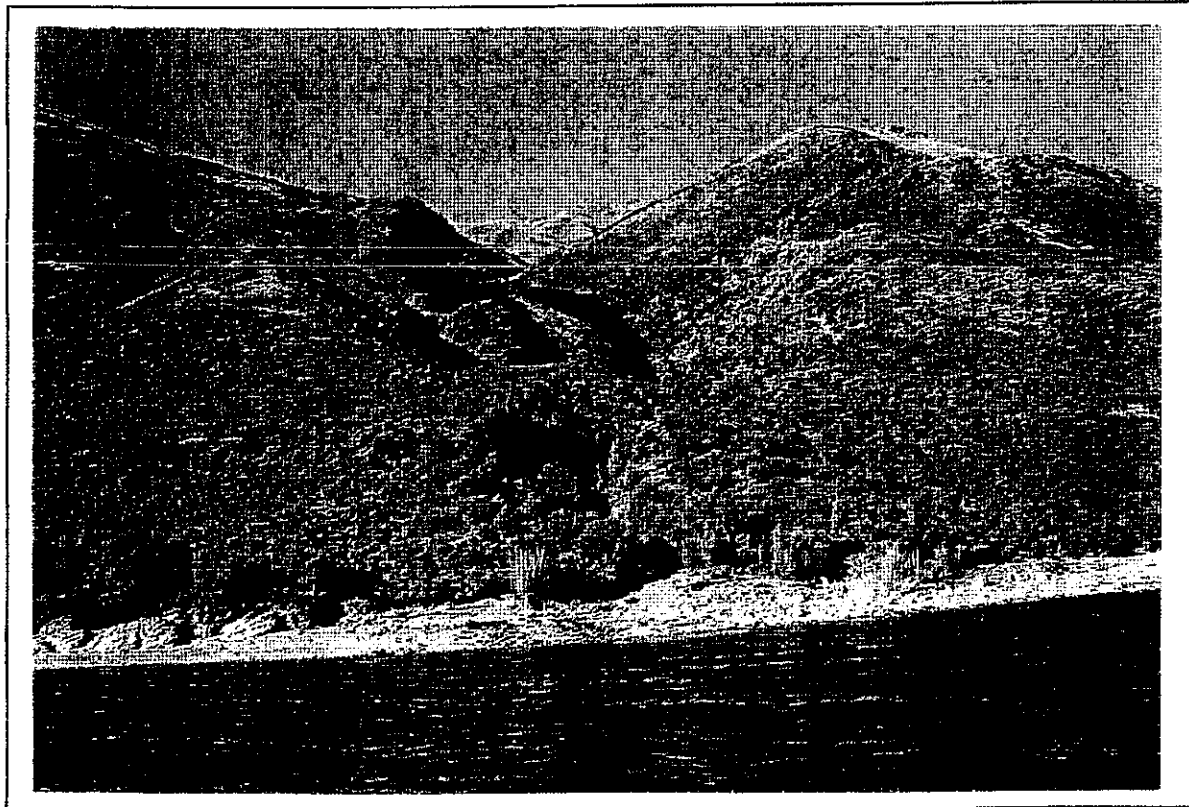


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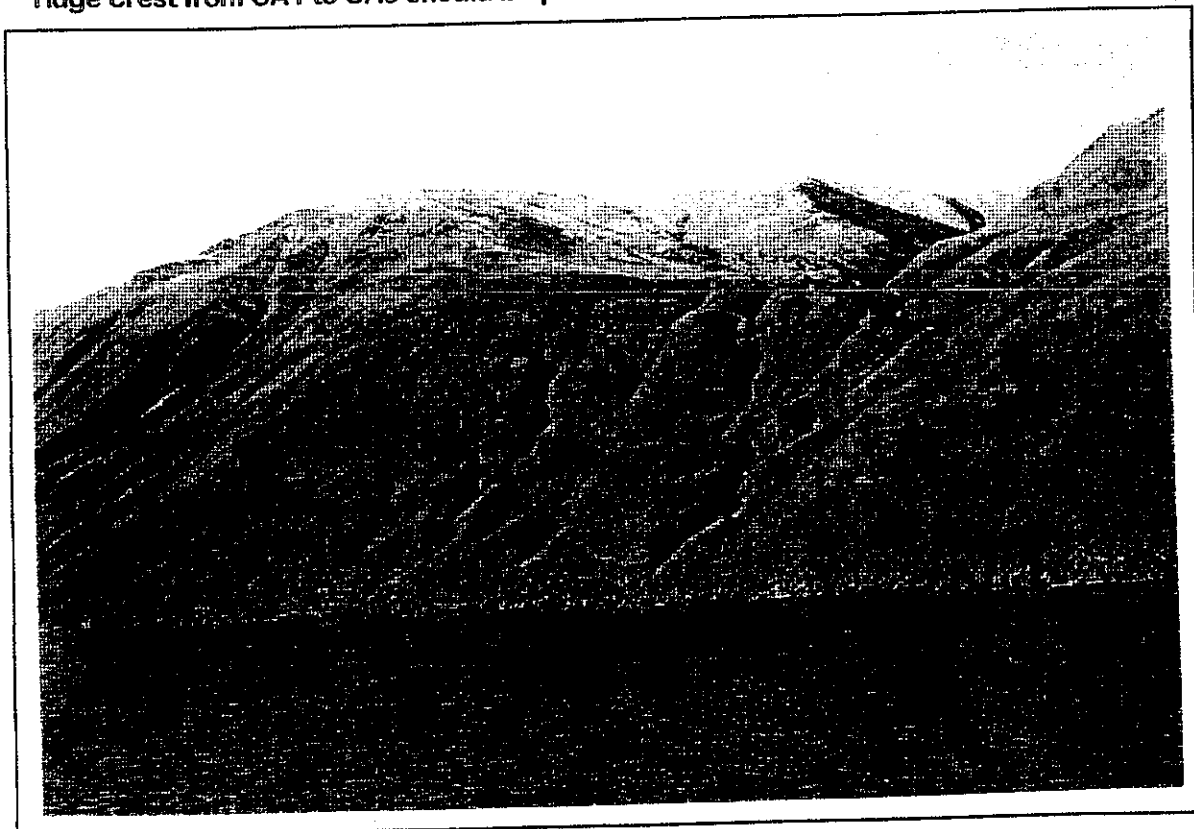
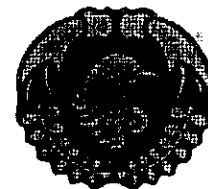


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19



**FOREST
& BIRD**

ROYAL FOREST AND
BIRD PROTECTION
SOCIETY OF
NEW ZEALAND INC

Upper Clutha Branch

PO Box 38
LAKE HAWEA

Secretary Ph. 03 443 8669

12th June 2004

The Commissioner of Crown Lands
C/o Opus International Consultants Ltd
Private Bag 1913
DUNEDIN

Dear Sir

Glen Dene, Po 136 – Submission on Preliminary Proposal.

We thank you for sending us a copy of this proposal. We would be pleased if you would accept this submission from our branch of Forest and Bird.

Our branch has at present a membership of 172 members; who all take an interest in tenure review as it is an issue that is ever present in our area. Our Society nationwide has 56 branches and a total membership of 40,000 members and to some degree represents a wider public interest.

The Society feels it is extremely important that it have input at this stage of the tenure review process and fully supports the aims and objectives of the Crown Pastoral Land Act 1998, Part 2; which are:

- *To promote the management of the Crown's high country in a way that is ecologically sustainable.*
- *Subject to the above, enable reviewable land capable of economic use to be freed from the managerial constraints (direct and indirect) resulting from its tenure under reviewable instrument; and*
- *To promote the protection of the significant inherent values of reviewable land by the creation of protective mechanisms; or preferably, by the restoration of the land concerned to full Crown ownership and control.*
- *To secure public access to and enjoyment of high country land for the people to enjoy.*
- *The freehold disposal of reviewable land.*

We also support the new complementary objectives arrived at after a review of those objectives (above) and added to by the current Government Cabinet Policy Committee on August 2003 (POL Min(03) 19/7); which are:

- *To ensure that conservation outcomes for the high country are consistent with the New Zealand Biodiversity strategy.*
- *Progressively establish a network of high country parks and reserves.*
- *Foster sustainability of communities, infrastructure and economic growth and the contribution of the high country to the economy of New Zealand.*

-2-

- *To obtain a fair financial return to the Crown on its high country land assets.*

150 years ago when pastoral farming first commenced in New Zealand it was assumed that all land between the seashore and the tops of the mountains could be and should be farmland. Other values were never taken into consideration. Over the course of the first 100 years we came to realise that the mountain tops were very fragile and prone to erosion and therefore not suitable for this type of farming, and that the higher land, and its mainly tussock cover, should be preserved for the harvesting and storage of water. 50 years ago Catchment Boards were formed. When they initiated "run plans" it started to relieve the pressure on the mountain tops by retiring this type of country. During the following 50 years we have also learnt that a considerable amount of the lower pastoral country contained considerable bio-diversity unique to New Zealand and to New Zealand alone. New Zealand has recently adopted a bio-diversity strategy to protect this biodiversity.

We see the tenure review process as the last opportunity to re-assess our Crown pastoral land resources, and with hindsight, and before the final disposition of any land, make good some of the mistakes we have made in the past by re-designating some of this land, and making secure public access, without any farmer coming to any great harm and to the benefit of the wider New Zealand population as a whole.

This submission has been written after an inspection of the property from SH6, from Lake Wanka by launch, from the air, members' knowledge and from the various reports available to us from LINZ website. We were declined permission to enter the property for an inspection but we were invited by the Burdon family to their home for a general discussion on the preliminary proposal as presented. We would like to take this opportunity to thank the Burdons for this invitation. We feel the discussions we had were frank and worth while. They for their part had some misgivings about the management of the land being returned to Crown ownership and control and to be administered by the Department of Conservation. We pointed out that such matters were beyond the scope of the CPL Act 1998 as we ourselves had endeavoured through our submissions to raise some similar matters and our submissions had been disallowed. We are a little puzzled as to why they and the CCL had allowed the proposal to be publicly advertised if they were not completely satisfied with it.

1. General:

- Glen Dene is a very visible property between Lakes Wanaka and Hawea situated on a major New Zealand tourist route; one of the first pastoral runs to be seen by tourists coming down from the West Coast on entering Otago.
- It is in a transitional zone between the high rainfall area of the Southern Alps and the drier Central Otago country.
- Consequent to the above it is also on the eastern edge of the western mountain ecological system.
- It is a difficult property to manage due to its location on SH6.
- The runs to the East of the Southern alps in the lakes area were never subject to inspection under the Protected Natural Areas programme. If they had however, it is obvious that some Recommended Areas for Protection would have been advised.

2. Inherent Conservation Values:

- The Glen Dene landscape is its main significant inherent value. Situated where it does on a main tourist route this value should feature very highly in any preliminary proposal presented, but it is not taken into consideration in this proposal.
- The remnant beech forest in the gullies, the pockets of shrub re-generating on the lower Wanaka faces and the higher altitude tall tussock grasslands all have significant inherent conservation value.
- Recreation values are very high on Glen Dene: walking, biking, horse riding, landscape viewing, shooting and fishing.

3. Access:

- Because of the high recreational values access on this property is important, especially access to the two lakes. While there is a strip of land 20.12m between the top operating level of Lake Hawea and the Glen Dene lease that can be treated, in so far as the public is concerned, as a 'marginal strip', it is essential that there be convenient and reasonable points of access to this strip.
- Walking and biking along the main ridgeline, and access to the ridge line, will also be extremely important for the future wellbeing of the district.

4. The Landscape:

- The mountains and mountainous landscape of the Southern Lakes area of New Zealand are what attracts the recreationist. It is also what brings tourists to New Zealand in ever increasing numbers; therefore is important to the wellbeing of New Zealand.
- A recent report by the Environmental Defence Society referred to the Wakatipu Basin landscape and drew attention to the damage that could be done to the landscape of that area while it is subject to the consent process in the District Scheme (report attached). The landscape of the Wanaka / Hawea area is of equal importance.
- ***It must be remembered that the landscape is not only the property of those who create it, but also of those who behold it.***
- While we cannot materially change the shape of the mountains we can alter the colour and texture of what is on them. This is being done in various ways by farming practices, i.e. burning, spraying, cultivation, over-sowing and top-dressing, earth works and forestry.
- The landscape on Glen Dene is made up of, in the main, bracken fern, woody plants or shrubs such as kanuka/manuka, matagouri, cabbage trees, flax, pittosporum tenuifolium, olearia and the remnant areas of beech in pockets where fire or stock have not been able to reach them. Above the bracken fern and woody shrubs there is first short tussock and then the tall tussock grasslands. All this is on mostly very steep mountainous country.
- The landscape on Glen Dene is in three units: (1) The western faces on the Lake Wanaka side that are very visible from that lake; these faces are very steep, dropping into the lake

-4-

with virtually no beach in places. (2) The northern faces between the Neck and Stewarts creek below Isthmus peak, which is very visible to the visitor travelling on SH6; this face is made up of glacially shaped rock benches and cliffs interspersed with pockets of bracken and associated vegetation. (3) The eastern, or Lake Hawea side, is made up of the catchments of four steep rough creeks with fans opening on to Lake Hawea. These fans have been mostly cleared, ploughed, or top-dressed and over-sown and turned into exotic pasture. There are also some small forestry blocks on this side.

5. The Proposal:

1. Land to be designated as land to be restored or retained in full Crown ownership and control as Conservation area, (under section 35 (2)(a)(i) Crown Pastoral Land Act 1998).

Area: approximately 1931 hectares (outlined in pink on map appended)

2. Land to be designated as land to be restored to full Crown ownership and control as Conservation Area, (under section 35 (2)(a)(i) Crown Pastoral Land Act 1998):

Area: approximately 6 hectares (outlined in pink on plan appended)

3. Land to be designated as land to be restored to or retained in full Crown ownership and control as Recreation Reserve, (under section 35 (2)(a)(ii) Crown Pastoral Land Act 1998):

Area: approximately 1 hectare (outlined in pink on plan appended)

4. Land to be designated as land to be disposed of to person specified (under section 35 Crown Pastoral Land Act 1998 subject to mechanism pursuant to section 40(1)(b) Crown Pastoral Land Act 1998:

Person specified: Glen Dene Ltd

Area: Approximately 5902 hectares (Outlined green on plan appended)

6. Areas of concern to us are:-

We believe this preliminary proposal as it is presented has many anomalies and is not protecting the inherent values present on the property as required under the CPLAct 1998. Nor does it identify areas that could be considered ecologically sustainable.

Having the Area CA3 returned to full Crown ownership is commendable, especially so as it goes practically from water's edge on Lake Hawea, to water's edge on Lake Wanaka; we fully support this concept. Also we fully approve of there being an off road car park for those wishing to access CA3, although access from here on in should be made wider to make it more user friendly.

56 ✓
54.4 ✓
51.2 ✓

-5-

(1) While an endeavour is being made to protect the conservation values on the eastern side of the main dividing ridge of the property by way of a covenant CC1, this does not extend to cover the similar higher altitude tall tussock country on the western side of the ridge which is of equal value and importance to conservation. This is of much concern to us. We point out that the Scoping Report regarded the Wanaka Faces as important enough to be protected with a Conservation Covenant.

57 ✓

(2) It is also important to note that this steep land on the Wanaka side of the ridge north of CA3 (the block of land to be returned full Crown ownership and control), is to be designated as suitable to become freehold, has very similar inherent values to that contained in CA3 itself and the covenanted area CC1. These steep faces should be protected; especially so for their landscape value (See photos # 5) It must again be noted that very similar values, i.e. regenerating shrubs to those contained in the area to be covenanted, CC2, extend all of the way to the Neck (See Photo # 4).

35 ✓

(3) Area CA1 (6 ha.) at the Neck only covers part of the wet lands. The conservation resources report and the designation report states that 10 ha be set aside for this important wet land which will then become part of the Boundary Creek Scenic Reserve to the north. (See 2.1.1 in the Designation report).. This wet land should include all the catchment of the wetland area and its surrounds and extend down to the shore of Lake Wanaka which will also give good walking access to the shore. Wetlands of this nature are becoming exceedingly rare in New Zealand now and must be protected at all costs. A deer fence has been erected across the face starting from the Neck itself. This fence intrudes into the landscape, but we see no reason as to why it cannot be shifted to higher ground to include the whole scene and the catchment down to the lake.

33 ✓

(4) Access to the shores of Lake Hawea for the public to enjoy has to be realistic. It must be remembered that Lake Hawea is a storage lake and has therefore varying water levels. With these varying water levels go beaches of varying width and type of surface underfoot and when the lake is full there are impassable cliffs to contend with.

40-2 ✓

(5) Of special concern is the fact that no walking access is available to the marginal strip (where it forms a bay, sometimes known as Bum Bay) on the south side of the prominent point with trig 10781 at its summit situated on the corner where the Neck arm of Lake Hawea commences. This bay is of extreme importance in that it is one of the only sheltered areas from the prevailing NW wind which can be readily accessed from SH6. While there is access being made available further south "i-j" there is still 2ks to traverse, mainly on a cliff when the lake is full, and rough walking to reach this bay when the lake is low. Whereas it is only some 3-400ms walk from SH6 to this Bay. (See 2.5.6 in the Designation Report)

55 ✓
40-2 ✓

(6) There is going to be an easement "i-e" to walk or climb to Isthmus Peak. This is to join on to the vehicle track at "e" (See Photo # 1) then climb and turn left and go south along the ridge crest to Mt Burke. This track, which starts on the south side of Dinner Creek, is not always on the legal road. The legal road is on a ridge further to the north as it starts to climb the hill. A legal road is the best and most secure access in so far as the public is concerned. At the time of survey we see no reason as to why the legal road could not be surveyed and altered to fit the present formation wherever possible.

45 ✓

-6-

(7) While the Burdons intimated that they themselves were not altogether happy with covenant CC1, we are not either, but perhaps for different reasons. While this covenant will restrict farming to sheep only to the extent that is consistent with the values and objectives set out in the covenant we cannot see how young plants that are necessary to replace the older plants can come away if there is any grazing at all. Also it will allow for burning if the Commissioner of Crown Lands gives his approval. If burning is allowed we cannot see how the inherent values are going to be retained. This Covenant should be re-written or *preferably* CC1 be returned to full Crown ownership and control instead of being designated as suitable to become freehold, and made contiguous with CA3 taking in the headwaters of Long Valley Creek at the same time.

37 ✓

(8) Having access to the marginal strip on Lake Hawea at "j-1" is good but it serves only to get people to that part of the Lake Hawea marginal strip. The small bay, sheltered from both north and south, to which easement "j-1" accesses has the potential to be an attractive conservation or recreation area. It will be vastly improved upon as time goes by as there are already regenerating shrub-lands just to the south and north of this point of access. Cabbage trees, kanuka, tutu, pittosporum and associated plants will soon cover the area which will make a pleasant place for the public to enjoy. This area should become a reserve of at least two or more hectares.

58 ✓

(9) Craighburn creek and Dinner Creek, adjacent to SH6, on their steep sides are carrying a remarkable variety of re-generating trees and shrubs; these should be protected by way of widened marginal strips. Wide enough to also allow walking access for the public to enjoy.

29 ✓

(10) Area "R" of approximately 1 ha is to become a reserve under the Reserves Act 1977. As we see it this takes care of an odd piece of Run Po136 which happens to occur below the road. This is admirable. This being perhaps the widest area of land occurring below the road from this proposed reserve and Stewarts Creek, we would recommend that in the process of Tenure Review the opportunity be also taken to tidy up the boundaries of the run by putting all the little areas, of mostly cliff face, back under Crown control. They contain some small areas of regenerating shrub-land (See Photo # 2) that would not be practical or economic to fence to include in the freehold, and yet improve the experience of the public using SH6 and give greater freedom of access to Lake Hawea. As an example, the land below the road north of the Neck on Hunter Valley and Makarora stations to Makarora at the head of Lake Wanaka, was withdrawn from grazing some years ago is supporting a young forest of native vegetation. This is now designated as the Boundary Creek scenic reserve.

59 ✓

(11) Area CA2. gives concern in that it is very narrow and is to be grazed by sheep and or cattle while passing through. This will have to be strictly monitored and if damage is occurring another route should be investigated. Here again we believe that any land that is uneconomic to fence and manage for farming purposes between the road and the lake up to access point "j-1" would be better under Crown control for the benefit of conservation and all New Zealand.

60-1 ✓

60-2 ✓

7. To meet our concerns:

A preliminary proposal is put together by the Commissioner of Crown Lands after being advised by the agent and his staff. He has also had full consultation with the Director General of the Department of Conservation, whose staff in turn have advised him after fully inspecting the property. The Commissioner of Crown Lands is also aware of some concerns raised at early warning meetings by NGO'S as part of the consultation process (Part 2 Section 26 of the CPLAct 1998).

We have studied the various reports available to us on LINZ web site and we ourselves have looked at all areas available to us and we have come to the conclusion that this Preliminary Proposal has been drawn up without giving due regard to the advice given in these reports produced by people with knowledge of the flora and fauna and other values on the property. To us this is not acceptable.

Nor has much, if any, notice been taken of the knowledge of the ecological sustainability that the agent for LINZ has at his disposal. A lot of the higher ground being farmed is not ecologically sustainable and we believe it should be returned to full Crown ownership and control or be protected by a strong covenant.

Under Para 6 of this submission we have listed 11 points that we believe should be addressed to meet the requirements of the CPLAct 1998. The map (sheet 2 of 2) should be redrawn so that:

(1) All the land covenanted by CC1, outlined in yellow on the map accompanying the preliminary proposal, should be returned to full Crown ownership and control and be added to by the head of Long Valley Creek and made contiguous with the other land to be returned to Crown ownership CA3

(2) It is our view that not enough credence is being given to the significant landscape values of the Wanaka faces south of the Neck and north of CA3. These western faces are very very visible and an important part of the landscape of Lake Wanaka. They consist of glacier carved slopes covered with bracken and re-generating shrub and forest lands. The lower portions of the main creeks flowing into the Wanaka are deeply incised and have many pockets of re-generating shrubs and forest in them. These creeks are most pronounced on the lower half of the face, they then open out into broader tussock covered basins on the top half (See photo # 6). These basins do not carry as much snow in the winter as the tall tussock basins on the eastern side of the range. If they are not properly protected, under a tighter farming regime due to the outcome of a tenure review, they will rapidly deteriorate.

At present this side of the property has not been modified with fencing or tracking. If it is to be farmed in an ecologically sustainable manner it will have to be economically viable, and to do that it will be necessary to fence it into smaller blocks and aerial top-dress and over-sow the area with exotic grasses and clovers. This will inevitably show up in the landscape of the faces as bare or green areas at mid altitude right through the face from end to end' as the tall tussock

26 ✓

35 ✓

above it will not be economic to top-dress, nor will the pockets of re-establishing woody shrubs and remnant beech forest at and above the lake edge be effectively grazed. This would create an undesirable and unnatural landscape in a very important area. To prevent the degeneration of the significant inherent values contained in the landscape on these western and also, the northern, faces of the property, a Conservation covenant must be prepared and adopted to prevent the following: burning, spraying or clearing of indigenous vegetation, over-sowing with exotic grasses or clovers, earth works or fencing. Cattle should not be grazed as they will damage the beech forest remnants and prevent the sustainability of the regenerating shrub and forest areas.

35 ✓

The whole face on this western side of the main ridge is in fact in better order than the western faces of CA3 itself. Cabbage trees are very noteworthy all along the face extending upwards to the tussock line in many places. The shore-line and above is well covered with tutu, pittosporum, olearia avicenneifolia, lancewood, carmichaelia and associated vegetation as is usually found in a re-generating forest (See photos # 3, 4 & 6). Given time it could cover the whole face.

The importance of the landscape of this part of lake Wanaka cannot be over emphasised,

(3) The Area CA1 should be enlarged in order to contain the whole catchment and surrounds as advised in the Designation Report.

33 ✓

(4) Walking access be provided from SH6 to Bum Bay as advised in the designation report.

40-2+
35 ✓

(5) That a recreation area of 2 ha at least be created where access to Lake Hawea is proposed at "j-1"

58 ✓

(6) While an easement "i-e" is proposed for walking and biking purposes from SH6 north of Dinner Creek to Isthmus Peak "h", and further south to Mt Burke "g", this is not so secure as having a legal road for public purposes. At the time of survey the legal road should be surveyed and re-adjusted to fit the present track formation. This proposed public access from SH6 "i" to "e" is far from satisfactory for either those on foot or mountain bikes unless a new track is cut and formed - it should be noted that a suitable track is being formed on Dingleburn to meet access requirements. Or, alternatively "d-e" be used for mountain bikes and those on foot, as well as access for vehicles used for management purpose..

45 ✓

9 ✓

It is acceptable that the track be closed for a period of one month at lambing time, but any such closure be for lambing only.

61 ✓

(7) Widen the marginal strips at both the Craighburn and Dinner Creeks to take in the regenerating woody shrubs and beech forest on either side of these creeks. These strips must be made wide enough to allow walking access over bluffs.

29 ✓

(8) It is most desirable that a walking only easement be established from the Neck to Isthmus Peak via the north ridge. Although steep at the top this route would give a good alternative to the other eastern approaches to Isthmus Peak and give another dimension to the walks available in the Neck area.

62 ✓

-9-

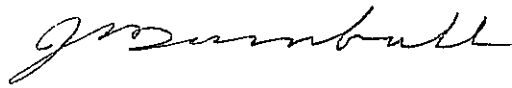
We thank you for this opportunity to have this input into the public submission process and we would be only too happy if there is opportunity created to further debate the issues before a substantive proposal is produced.

Attached is a copy of the ODT Environmental Defence Society report.

Attached are photographs to illustrate the points and issues we have raised.

Attached is a map to illustrate better our concerns regarding the proposed designations.

Yours faithfully

A handwritten signature in cursive script, appearing to read "John L. Turnbull".

John L Turnbull

For and behalf of the Upper Clutha Branch Forest and Bird

O.D.T.

Tuesday, May 25, 2004

Call for more checks on development

■ Landscape could be damaged: report

By Mike Scott

The Wakatipu Basin landscape risks further unnecessary damage while discretion remains at the heart of the Queenstown Lakes District Council consents process, an Environmental Defence Society (EDS) report says.

The report calculates the effects of regional development on New Zealand's outstanding landscapes and specifically targets the Queenstown area for analysis.

EDS senior policy analyst Raewyn Peart said the "horse had already bolted" under the Warren Cooper-led Queenstown Lakes District Council, which was pro-development.

While the present council was far more cautious and strict when granting building consents, the discretionary nature of the process meant if a pro-development council was elected, unrestrained environmental damage might resume, she said.

"The management of landscapes is left to a system that

■ Wakatipu

offers no certainty or protection. We need a lasting consensus on rural development and subdivision which outlives the 'short-termism' of local politics.

"There are few checks and balances and most landscape plan provisions never get to the Environment Court for scrutiny."

The only check to even more intensive development during Mr Cooper's time as mayor had been the Wakatipu Environmental Society, Ms Peart said.

However, protection for outstanding landscapes should not have to fall to small residential lobby groups, she said.

The EDS, a group of resource planners and professionals who volunteer time to environmental matters, created the report on the state of New Zealand's outstanding landscapes.

Protecting areas such as the Wakatipu Basin, Coromandel Peninsula and Banks Peninsula was in the national interest and not just for people living in those regions, Ms Peart said.