

Crown Pastoral Land Tenure Review

Lease name: HUNTER HILLS

Lease number: PT 082

Public Submissions - Part 1

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

July

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Submission 1

Submission 1

3 of ~~John~~ T
T. H. ...
Margaret Wilson (K...)
26 Leaden St

Bob Webster

~~Female Review Consultant~~ T. H. ... 7910

OPUS international consultants Ltd

110 Bay 1482

Christchurch 8140

Dear Mr Webster

I agree with the female review
of the Hunter Hills

Thank you for the opportunity
to comment

Yours sincerely

Alan Evans

Alan Evans



Submission 2

Submission 2



15 December 2009

The Commissioner of Crown Lands
C/- Opus International Consultants Ltd
PO Box 1482
CHRISTCHURCH 8140

Attention: Bob Webster

Dear Bob

58 Kilmore Street, PO Box 345, Christchurch

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HUNTER HILLS

SUBMISSION ON PRELIMINARY PROPOSAL FOR TENURE REVIEW

Thank you for advising Environment Canterbury of the release of the Preliminary Proposal for tenure review of Hunter Hills pastoral lease. We appreciate the opportunity to review the proposal and make a submission in relation to the future management of this land.

Environment Canterbury has statutory responsibilities under the Resource Management Act 1991 (RMA) for the sustainable management of natural and physical resources of the region, including soil conservation, water quality and quantity and ecosystems, and for maintenance of biodiversity. In addition, Environment Canterbury also has statutory responsibilities under the Biosecurity Act 1993 for the management or eradication of animal and plant pests in accordance with regional pest management strategies. These responsibilities are entirely compatible with achievement of the objectives of Tenure Review, specifically to "promote the ecologically sustainable management of High Country land" and protecting land with "significant inherent values" by retaining it in Crown ownership.

The Canterbury Regional Policy Statement 1998 (CRPS) provides an overview of the resource management issues of the region, and sets out how natural and physical resources are to be managed in an integrated way to promote sustainable management. Key to the management of soils is the maintenance or restoration of a vegetative cover over non-arable land that is sufficient to prevent land degradation or the onset of erosion (Ch7 Objective 1). Sustainable management of water resources requires safeguarding the life-supporting capacity of water, including associated aquatic ecosystems and significant habitats of indigenous fauna and vegetation (Ch9 Objective 3). Policy 11 in Chapter 9 promotes land use practices which maintain or enhance water quality. Large landscapes are a feature of the Canterbury high country and the CRPS recognises the importance of protecting both the interconnectedness of landscape components and the vast, open nature of these landscapes.

Environment Canterbury has recently notified its Proposed Natural Resources Regional Plan (NRRP) to address the resource management issues identified in the CRPS and to provide more specific standards and methods, including rules, to achieve the objectives. The NRRP recognises the close relationship between land and water ecosystems by promoting the integrated management of soil and water resources across the region. In particular, the provisions of the plan emphasise the links between land use practices and the management of water quality.

Our Ref: PL5C-103; AG5T/146

Your Ref:

Contact: Cathie Brumley

The Soil Conservation chapter (Ch8), Objective SCN1 seeks to: "...maintain soil quality and an intact and resilient vegetation cover sufficient to minimise the risk of induced erosion, safeguard the life-supporting capacity of the soil, and prevent, as far as practicable, the movement of soil into water bodies." The objective contains specific guidelines for intact and resilient vegetation cover. Policy SCN1 provides options to restore such a cover where it has become depleted.

Policy WQL5 of the Water Quality chapter includes a range of regulatory and non-regulatory methods to manage the riparian margins of rivers to maintain or improve water quality.

The Canterbury Regional Pest Management Strategy (2005) [which is a revised combination of the former CRPMS (1998) and the Canterbury Regional Pest Management Strategy Biodiversity Pests (2002)] identifies a number of species of plants and animals for control or management as pest species.

In line with these statutory responsibilities and documents, and Section 24 of the Crown Pastoral Lands Act (1998), Environment Canterbury technical and planning staff have reviewed the Preliminary Proposal for the Hunter Hills pastoral lease to assess the impacts, if any, of this proposal on the sustainable management of the land, including pest management, indigenous biodiversity protection, recognition and protection of significant landscapes, public access opportunities, soil conservation and the integrity of the water bodies. Our comments and recommendations are listed below.

General comments

The Hunter Hills lease land forms part of the eastern margin of the larger Hakataramea Valley which has been identified as a regionally significant landscape for the southern hill country in the Canterbury region. Preserving the specific values that this land contributes to the larger Valley landscape should be a focus for the assessment of the inherent values of this land.

The slopes of the lease are traversed by a number of streams flowing into the Hakataramea River which in turn flows into the Waitaki River. The management of these upper tributaries will be important to maintaining the overall health, biodiversity and recreational values of the Hakataramea and Waitaki Rivers.

The earlier retirement of the upper slopes of the Hunters Hills protected the most visible and highly natural parts of this range, together with the headwaters of most of the streams traversing the slopes of the range. Protection proposed for the mid and lower portions of these catchments where they are contained within the pastoral lease will secure long-term the high quality of these waters and their contribution to the Hakataramea and Waitaki catchments.

The area retired along the top of the Range protected the most erosion prone parts of the Hunter Hills Range, dominated by Class VIIIe land with severely limited productive potential and high value for water catchment protection. The Preliminary Proposal compliments this by including most of the remaining areas of high erosion risk Class VIIe land within the CA2 area and is considered to be a good outcome for soil conservation values.

The natural values of the lease area have been well described in the Conservation Resources Report and provide a very clear picture of the range of values and their priority for protection to meet the objectives of the Crown Pastoral Land Act for tenure review.

The authors of both the Preliminary Proposal and the Conservation Resources Report should be congratulated for producing a clear and thorough discussion of the range of values relating to the objectives for tenure review and for the development of a proposal for tenure review that takes a comprehensive and practical approach to the protection of the significant inherent values of the land.

For these reasons Environment Canterbury broadly supports the proposals for the designation of land to the Crown and to freehold. The following discussion focuses on those aspects of the proposal that address the areas where Environment Canterbury has specific responsibilities for management of natural resources. The discussion is based on the information held by the Council on the lease land, and the expertise and knowledge provided by the staff in relation to the proposed designations.

Soil conservation

Land Improvement Agreements (LIAs)

Despite extensive soil and water conservation works being completed on the property (see Plan 1 attached), there has not ever been any binding Land Improvement Agreement (LIA) over this lease. A draft LIA was prepared in 1982, designed to secure the works and conditions in the five year Soil and Water Conservation Plan programme, but was never signed nor sealed.

Soil and Water Conservation Works undertaken

In the years from 1958 to 1969, ten proposals for works in advance of a Soil and Water Conservation Plan (S&WCP) were approved and implemented. The type and extent of these works are shown in green in the attached Plan 1.

The 6400 km of erosion control fencing completed as part of these advance works effectively retired the Northern end of the Hunters Hills (crosshatched in green) from grazing in 1960. It was later upgraded to a retirement fence.

In 1978 a five year Soil and Water Conservation Plan was prepared which built on the works in advance. However, several amendments were made to the programme before it actually got underway in 1981.

The objectives achieved were summarised in a September 1987 Programme Review as follows:

- "(i) 1930 ha (approx) of higher altitude Class VIII and severely eroded Class VIIe lands retired from grazing for vegetation recovery and water retention.
- (ii) Offsite grazing provided for the 297 displaced stock units by way of mid altitude subdivision fencing and 40 ha of lower altitude pasture development.
- (iii) Improved and better maintained vegetative cover on the mid-altitude areas, particularly on sunny aspects, by the erection of erosion control fences.
- (iv) Reduced fire hazard due to improved access and better grazing control. Burning now limited to controlling matagouri scrub.
- (v) Both the subdivision fencing and pasture development has given improved cover and grazing control and provided the runholder with an increased carry capacity.
- (vi) Some windbreak protection has been established on the lower downs."

The type and extent of works completed under the five year S&WCP Programme is shown in red on the attached Plan 1. This included the continuation of the erosion control fencing erected in the advance works down to the southern end as recuperative spelling fencing in 1985.

Soon after the erection of the recuperative spelling fence along the Southern end of the lease (crosshatched in red), the combined areas of the lease lying above the erosion control and recuperative spelling fenceline (1995.0600 ha by survey) were surrendered from the lease and gazetted as Conservation Land in 1997.

Attached Plan 2 shows the distribution of LUC Classes for the lease land. It shows that all of the Class VIII land and much of the severely eroded Class VII land were removed from grazing with the retirement of the upper slopes.

Despite there being no binding LIA, this retirement was considered to be a very good outcome for soil and water conservation.

Proposals CA1 and CA2

Much of the remaining areas of Class VIIe land along the upper slopes of the pastoral lease have been included in the proposed conservation areas CA1 and CA2 to be retained in Crown control for conservation. These areas are classified as Class VIIe1 and VIIe12/13, being steeplands in hill country and mountainlands respectively, with severe erosion risk and very limited potential for production. Inclusion of these areas as land to be retained by the Crown is therefore fully supported by Environment Canterbury as this will enhance soil conservation values for these vulnerable slopes, and will also be beneficial for water conservation of the various tributaries flowing into the Hakataramea. The value of these areas for water harvesting and low flow augmentation for a stressed Hakataramea River shouldn't be underestimated.

Their inclusion will certainly add value also to the adjoining conservation land along the Hunters Hills.

The lower slopes in CA1 adjacent to the Hakataramea River are predominantly Class IV and Class VI soils where production is limited by drought, cold and wind erosion. While these soils are capable of improvement with OSTD or irrigation, wind erosion and drought will remain the key limiting factors.

Areas CA1 and 2 have been superimposed onto the LUC in Plan 1.

Land to be disposed of as freehold land.

From a soil conservation perspective, Environment Canterbury considers that the land identified to be disposed as freehold land can be managed sustainably. The majority of this land is well fenced and developed Class VI and IV land in a good rainfall zone and when farmed in conjunction with the existing freehold block (574.2178 ha) should make a strong, sustainable farming unit.

Indigenous Biodiversity

Both the Preliminary Proposal and Conservation Resources Report make use of the Land Environments of New Zealand (LENZ) and Threatened Environments Classification systems. The most highly threatened environments on the pastoral lease, that is, the river flats, terraces and gentle foot slopes at the northern end; and the low-altitude slopes at the southern end, have been clearly identified.

All areas of botanical value identified in the CRR are included in the two public conservation areas proposed, with the exception of scrub, shrubland and tussock vegetation along the steep-sided gully of Andersons Stream in the middle of the property. Examples of the Andersons Stream vegetation/habitats are present also in CA1 and CA2. All areas of native or semi-native vegetation/habitats on the most highly threatened river flat, terrace and foothill environments are proposed for protection. The proposed conservation areas also directly link the threatened low-altitude habitats to more intact and extensive montane-alpine habitats, including the existing Hunters Hills Conservation Area.

The proposed conservation areas offer good quality habitat for native birds, lizards and freshwater fish and invertebrates identified in the CRR. Both, but especially CA1, will form valuable additions to the region's network of protected natural areas. For these reasons the proposal is supported as contributing to the long-term protection of the significant natural heritage of the region.

Environment Canterbury compliments all parties involved in the preparation of this review.

While the Andersons Stream gully is not proposed for formal protection in the Preliminary Proposal, Environment Canterbury would recommend that a legal covenant be put in place over the proposed freehold land to protect the valuable areas of shrublands along the steep incised stream gully (as identified in the CRR). The topography has naturally protected the site to date and is likely to do so into the future. A covenant, however, would add formality and certainty to this 'de facto' protection.

Surface water resources

The lease contains some of the key water catchments draining into the Hakataramea and Waitaki Rivers. Streams traversing the land are generally of high water quality and inherently low nutrient status. The recording of significant populations of the lowland longjaw galaxias in Cabbage Tree Gully is testament to the high water quality remaining in these streams. This stream is also significant for the lack of exotic species of fish recorded.

Overall, Environment Canterbury supports and applauds the designation of both areas CA1 and CA2 as contributing to the long-term ecological sustainability of the significant biodiversity and water quality values of the area.

Recreation and public access

Environment Canterbury supports the addition of the CA1 conservation area and access provision from the Hakataramea Road as greatly enhancing the ability of the public to enjoy the recreational opportunities of this area and the greater Hunter Hills Conservation Area.

Recommendations

Environment Canterbury supports the Preliminary Proposal for tenure review of the Hunter Hills pastoral lease as providing a very good outcome for soil and water conservation and protecting the significant inherent natural values identified for the area. In particular it will contribute to the protection of the water quality of the Hakataramea catchment and the Waitaki River and will maintain the interconnectedness of the extensive natural landscapes of the wider Hakataramea Valley.

Environment Canterbury would recommend one addition to the protection of values for this lease: that a conservation covenant is put in place over the proposed freehold land to protect the valuable areas of shrublands along the steep incised stream gully of Andersons Creek (as identified in the CRR).

The Council is very supportive of the comprehensive nature of the review and the integration of the key sources of information available for land and water resources. Overall it is considered that this proposal contributes to the objectives of tenure review for the long-term ecologically sustainable management of the land.

Thank you for the opportunity to comment on this Preliminary Proposal.

Yours sincerely



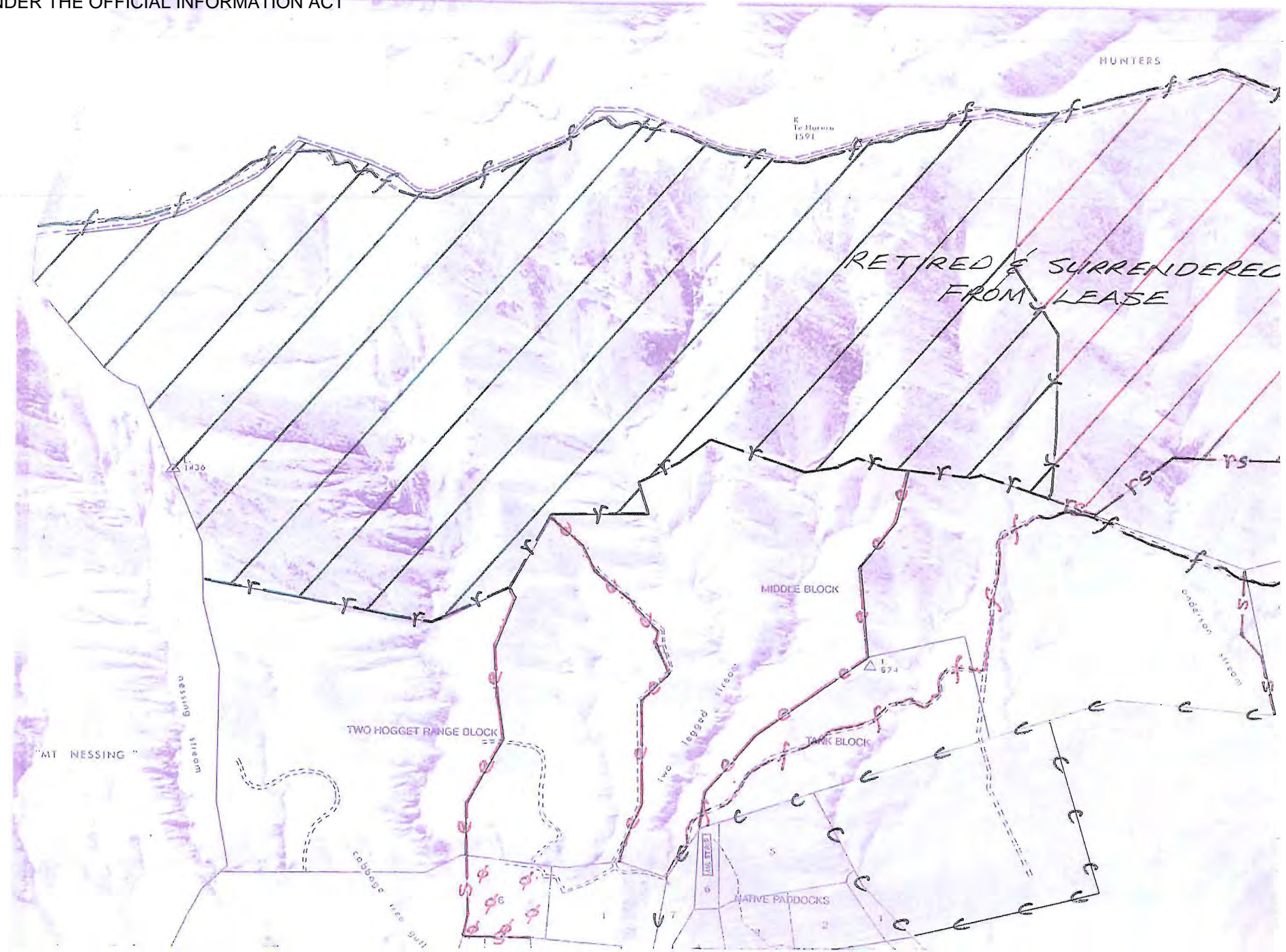
Don Rule

DIRECTOR RESOURCE PLANNING AND CONSENTS

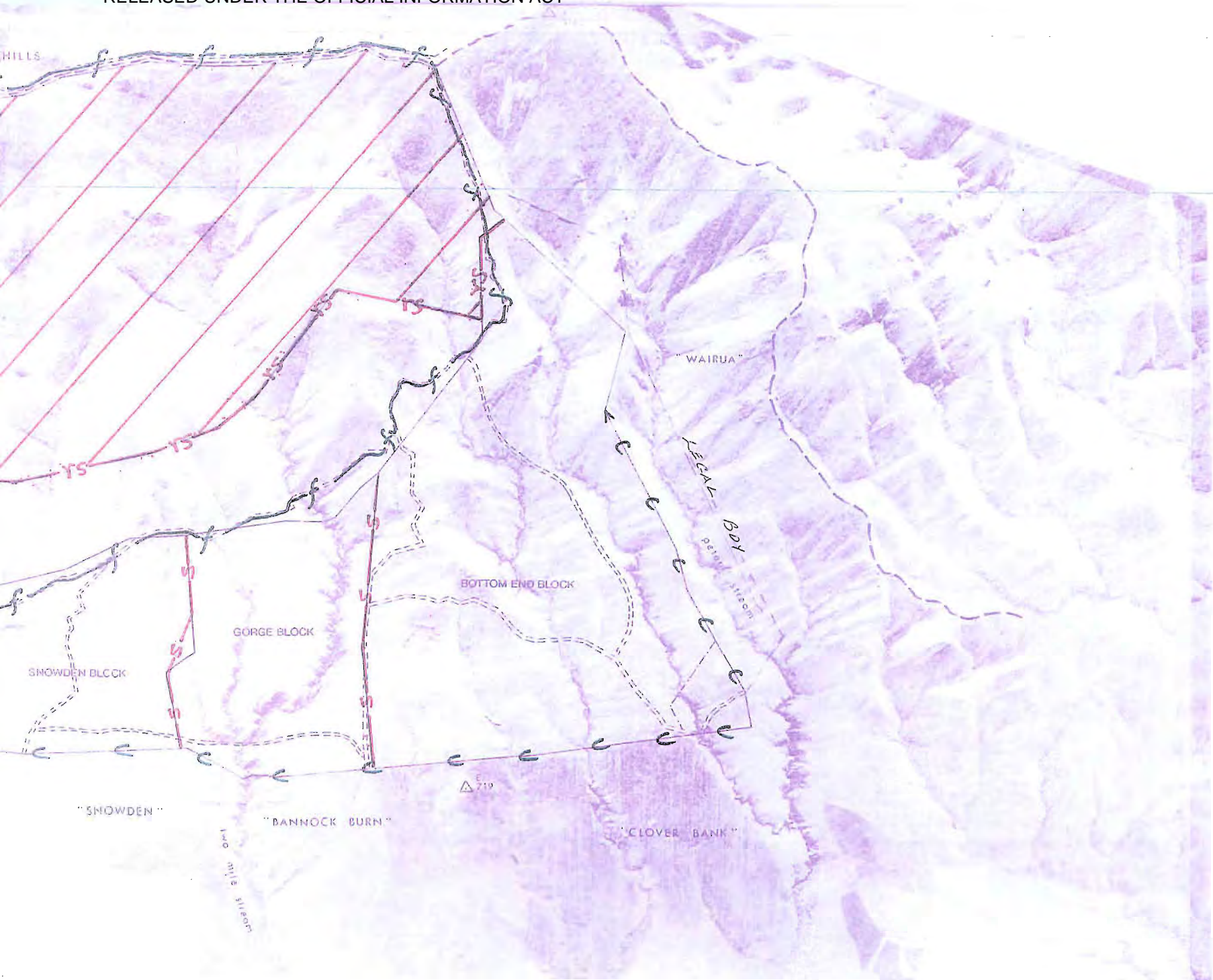
Attachments:

- Plan 1 Soil Conservation Works completed for the Hunter Hills pastoral lease
- Plan 2 Land Use Classification for the Hunter Hills pastoral lease

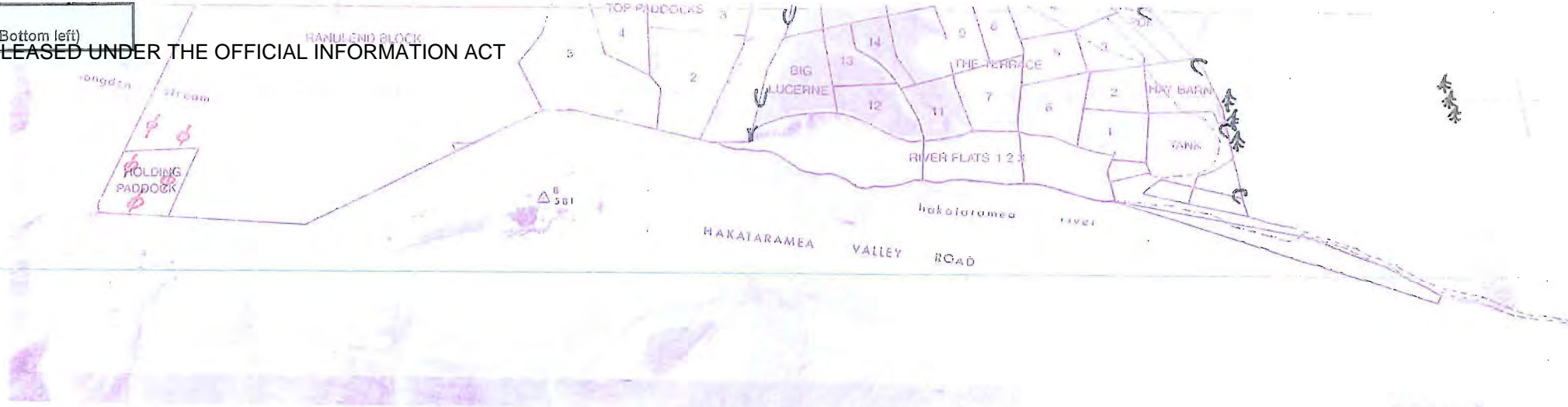
RELEASED UNDER THE OFFICIAL INFORMATION ACT



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SOIL CONSERVATION WORKS COMPLETED
IN ADVANCE 1958-1969

- 6400 m — r — RETIREMENT FENCING (ORIGINALLY EROSION CONTROL FENCING)
- 8005 m — f — STRATEGIC FIREBREAK ACCESS TRACK FENCING
- 19700 m — c — BOUNDARY & INTERNAL CATTLE PROOFING
- 700 m — A A A A WINDBREAKS

TOTAL COST \$7646 SUBSIDY \$2,846 (HISTORICAL)

HUNTERS HILLS FARMING CO

5236 ha

SOIL CONSERVATION WORKS COMPLETED UNDER
5YR PROGRAMME BETWEEN 1981-1985

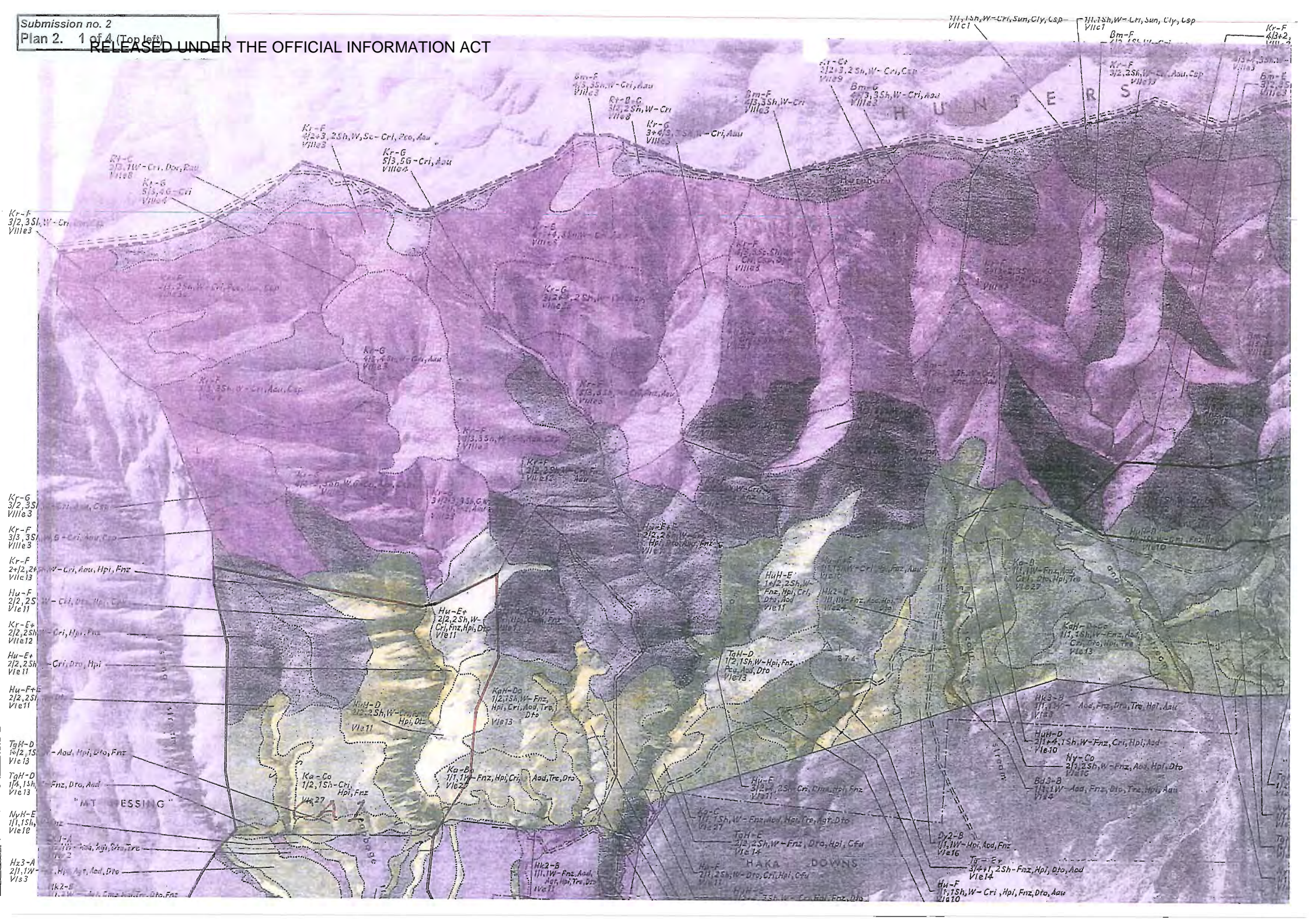
- 5000 m — TS — RECUPERATIVE SPELLING FENCING
 - 11,500 m — e — EROSION CONTROL FENCING
 - 9000 m — S — OFFSITE FENCING
 - 40ha φ φ φ OFFSITE CULTIVATION
 - 3000 m — f — STRATEGIC FIREBREAK ACCESS TRACK
- TOTAL COST \$60,067 SUBSIDY \$37,188 (HISTORICAL)

PLAN 1

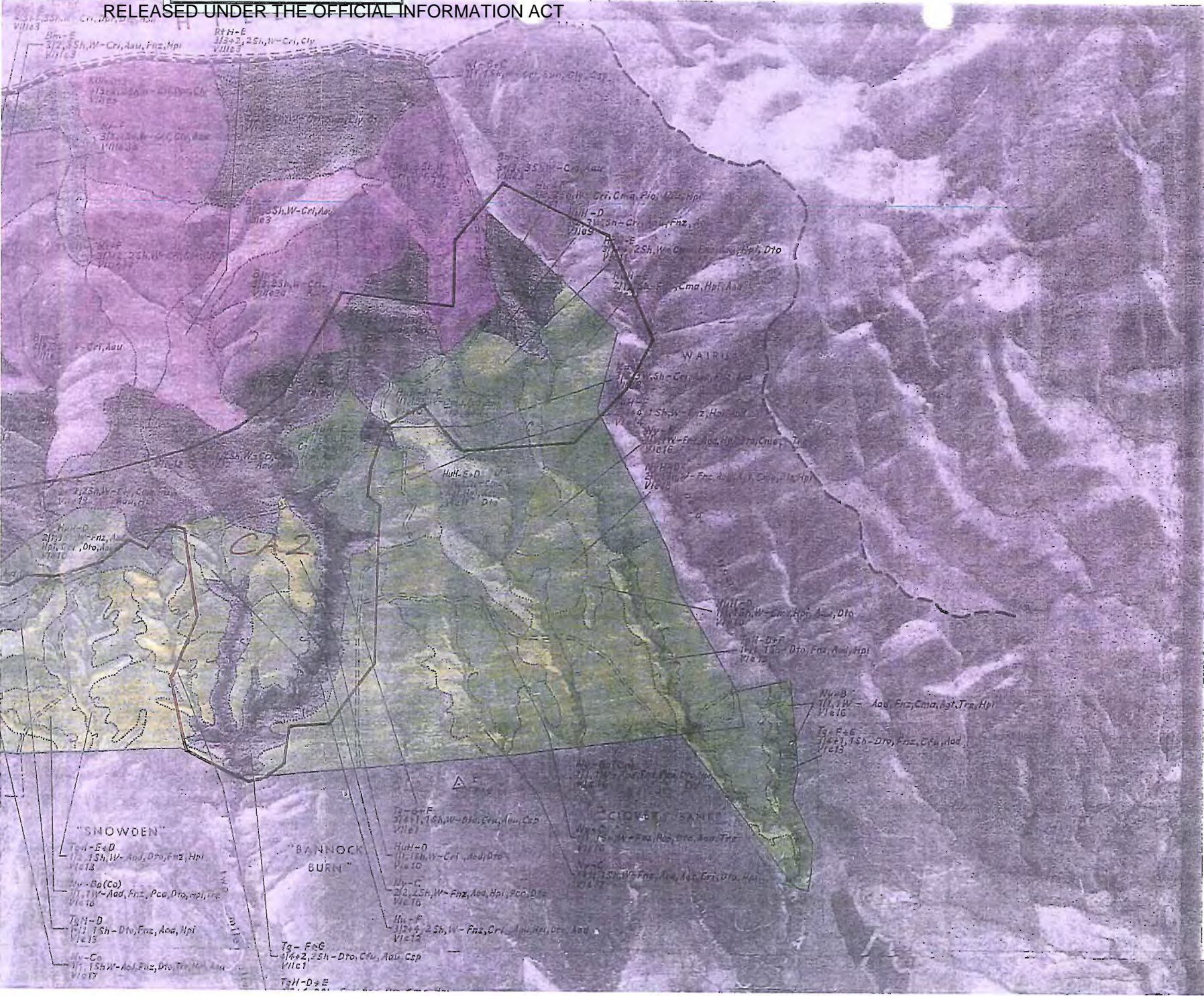
W 23 760

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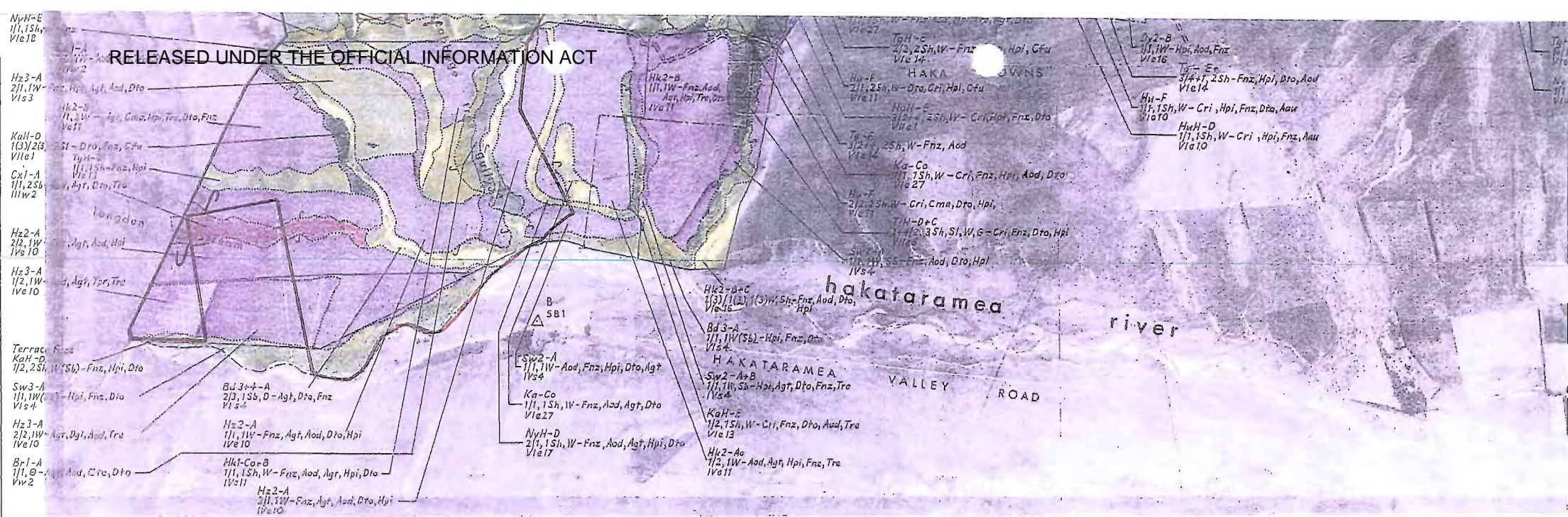
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surveyed
designed
drawn
traced

Submission no. 2
Plan 2. 3 of 4 (Bottom left)

by		date
O.W.M	P.A.H	1.78
	P.H.H	2.78
	M.A.C	3.78

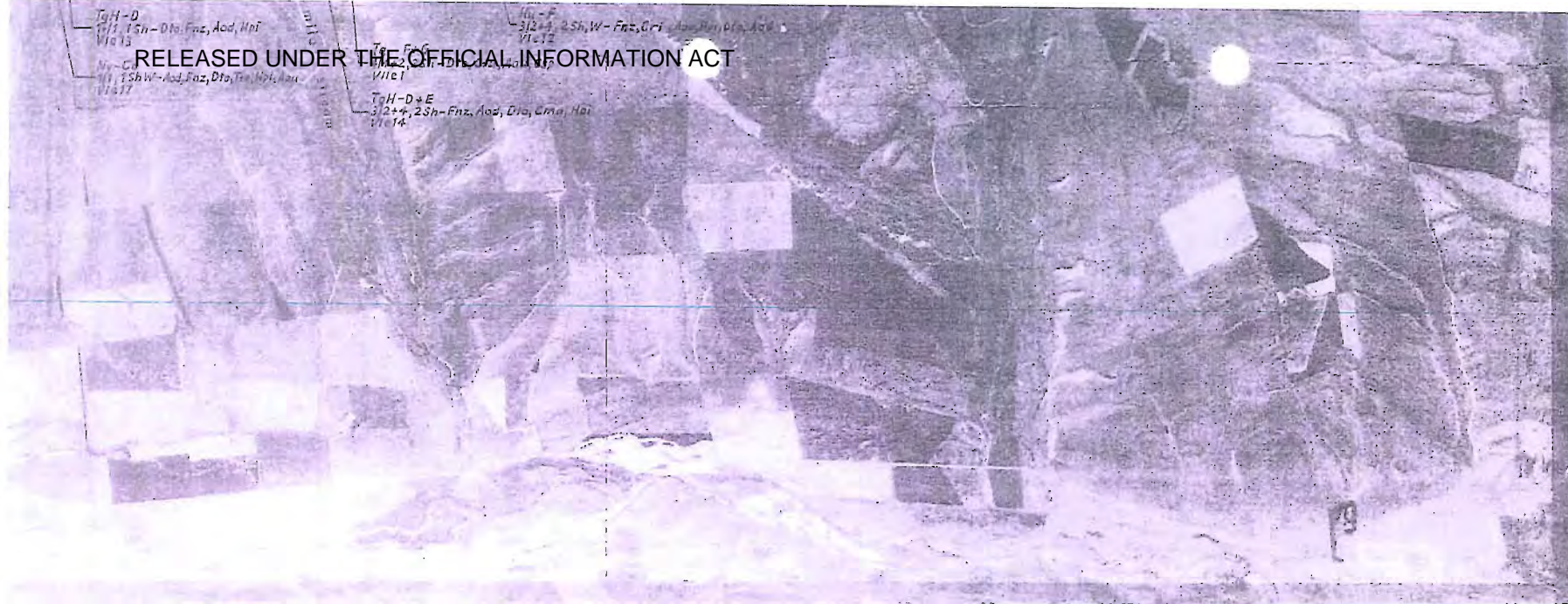
catchment no.
aerial photo ref.
level book no.

W.C.C. Area Bdy
C.T. Bdy
Fence line
LI-LUC Unit Bdy

S N 2139	4188/14
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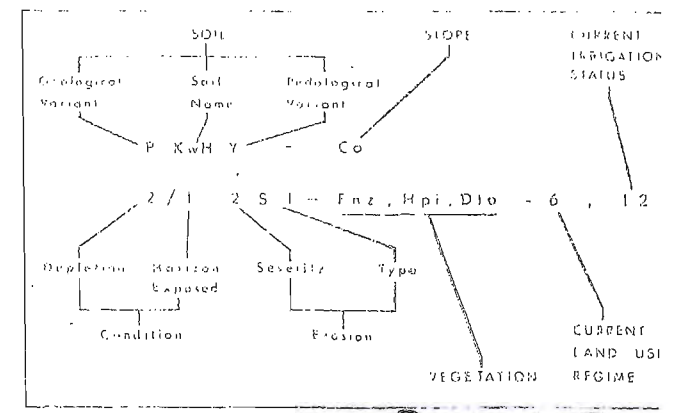
HUNTERS HILLS

RELEASED UNDER THE OFFICIAL INFORMATION ACT



T-11-D
1 Sh - Dio, Fnz, Aod, Hpi
VIC 13
T-11-C
1 Sh W - Aod, Fnz, Dio, Tr, Hpi, Aod
VIC 17

T-11-F
3/2 Sh - W - Fnz, Cri
VIC 12
T-11-E
3/2 Sh - Fnz, Aod, Dio, Aod, Hpi
VIC 14



PLAN 2

D.G. & D.B. SMITH

AREA	SCHEDULE		
PETERS CREEK	Occupied in adverse.	12	
HAKA DOWNS	" " "	97	
		109	109
HUNTERS HILLS	" " "	(Haka Downs)	-144
			- 35
HUNTERS HILLS (C.T. Area - See Report)			4903
TOTAL Management Area			4868 ha

scale 1:23 760

file

plan no. S & W 101

WAITAKI CATCHMEN
COMMISSION AND
REGIONAL WATER
BOARD



KUROW

Submission no. 2
Plan 2. 4 of 4 (Bottom right)

Submission 3

Submission 3

NORTH OTAGO TRAMPING AND MOUNTAINEERING CLUB
PO Box 217
Oamaru 9444



18 December 2009

Bob Webster
Opus International Consultants Ltd
PO Box 1482
Christchurch 8140

Dear Mr Webster

Hunter Hills Tenure Review

The North Otago Tramping and Mountaineering Club broadly supports with reservations the preliminary proposal relating to the Hunters Hills pastoral lease. Our reservations concentrate on tramping access issues which appear not to have been effectively addressed.

The preliminary proposal asserts that recreational access is not currently available from the Hakataramea Valley to the Hunters Hills Conservation Area. This is nonsense. In fact, practical access to the Hunters Hills tops is available in several places across farmland with the goodwill of runholders. By permitting 4WD access to, for instance, topdressing airstrips, tramping daytrips to the tops are possible. The preliminary proposal appears not to attempt to offer equally practical legal access.

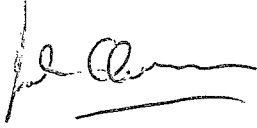
In particular, the access suggested to CA1 does not appear to offer practical access for tramping daytrips to the Hunters Hills tops. Nor is any practical access suggested for the area CA2 from the valley.

Members of this Club understand that a walkway was created along the boundary of Hakataramea Downs and Snowdon Stations, giving access to the Anderson Stream. This has been shown on farm property sale maps and could provide access to CA2. This needs to be explored further.

Finally, we understand that the owners of Round Hill were not notified of this preliminary proposal, even though the proposed CA1 would be on their boundary. They are now aware of it.

To conclude, from the perspective of this Club, the preliminary proposal's failure to address practical access issues for tramping is extremely disappointing.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Chetwin', with a horizontal line underneath.

John Chetwin
Secretary