

Crown Pastoral Land Tenure Review

Lease name: HUNTER HILLS

Lease number: PT 082

Public Submissions - Part 2

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

July

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Submission 4

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Dear Robert

**Submission on the Preliminary Proposal
for the review of tenure
Hunter Hills Pastoral Lease
under the Crown Pastoral Land Act 1998**

This submission is on behalf of the South Canterbury Branch, Royal Forest and Bird Protection Society of NZ Inc, (the Branch). Hunter Hills Station falls within the area of interest for the Branch and it contains many special features and values, which we would like to see protected and maintained for the long term. The Branch appreciates the opportunity to submit on the Preliminary Proposal for the Review of Tenure of Hunter Hills Pastoral lease.

The **Mission Statement of the Society**, which the Branch also subscribes to, is;
“To preserve and protect indigenous flora and fauna and natural features of New Zealand for the benefit of the public including future generations.”

One of the Goals of the Society is; *Crown lands with high biodiversity values receive appropriate protection through addition to the conservation estate...”*

And, another Goal, for the South High Country includes;

- *To protect the full range of high country biodiversity, landscape and recreational values in new public parks, reserves and conservation areas managed by DoC.*
- *Achieve ecologically sustainable management on remaining pastoral lease lands.*
- *Sustained control of woody weeds and wildling trees.*

General observations:

The Hunters Hills are highly visible, open, upstanding tussock range country that contributes in a major way to the character and quality of the Hakataramea (Haka) Valley landscape, see photos below (1).



Photo 1

It has a highly natural appearance and typical high country tussockland character, with a very high degree of intactness and visual coherence. Hunters Hills pastoral lease comprises almost 10km of the range across the central and highest part, and contributes significantly to the overall integrity of the range landscape. We do not agree that the property has only moderate landscape value as stated in the CRR p7 (Ref: Conservations Resources Report - Department of Conservation July 2006). Our view is that it has high landscape value. We note that the criteria for assessing landscape did not use the Department of Conservation (DOC) guidelines 2004 for assessment, which focus more on representativeness and contribution to high country character rather than biophysical naturalness and aesthetics although the latter are certainly important factors.

The naturalness and integrity of the range landscape needs to be protected, as a key part of the Hakataramea Pass and valley experience, see photo 2 below.



Photo 2

The trip through the valley and over the Pass is one of our few “back country” road experiences and we think this experience needs to be enhanced for future generations to enjoy as we have. We would not like to see continued loss of native shrublands and ‘greening’ of the tussocklands, with upward progression of more intensively developed farmland.

The property also almost entirely consists of threatened land environments, mostly in the Critically Under-protected category but also including portions of all other categories, which have greater threat status. We note that the uppermost parts of the property, whilst having important landscape

values, are in the "No Threat category".

On this basis, greatest attention needs to be paid to the lower altitude areas of greater risk, to ensure that remaining areas of more natural cover and landscape are protected so that they may continue to contribute to the overall natural diversity of high country landscape.

We also note that this property is critical for providing public access directly from the road to the existing Hunters Hills Conservation Area in this part of the Hakataramea Valley.

2. Summary of proposal and description of proposed designations:

2.1 Land to be restored to Crown Control

2.1.1 Approximately 615 ha to be designated as land to be restored to or retained in Crown control as Conservation Area (shown shaded in pink and labelled CA1 on the designation plan included in the Proposal document) under Section 35(2)(b)(i) Crown Pastoral Land Act 1998 subject to qualified designations.

This proposal to retain approximately 615ha, labelled as CA1, in Crown control as Conservation Area, is fully supported by the Branch but with some recommendations. (see below)

Proposed CA1

We are very pleased to see the proposal for full protection of this area. Added to the Hunters Hills Conservation Area above, this will enable full altitudinal sequences to be protected and will include the most threatened land environments – all the Acutely and some of the Chronically threatened environments as well as the only area of At Risk environment on the property. The montane to subalpine slopes are a critically underprotected environment.

The removal of stock and ability for native vegetation cover to improve will benefit the aquatic environments that support important native fish species.

This area also contains the greatest diversity of landforms and vegetation types including valley floor wetlands and snow tussock cover on a valley floor fan between 600-700m altitude. It is the only part of the lease that runs from the Hakataramea River to the tops (taking into account the adjoining conservation area, which was retired out of a run plan).

Retaining this area as public conservation land also secures ready public access into the conservation area, directly from the Haka Valley Road and Haka River.

We note that good snow tussock cover and presence of numerous patches of grey shrublands continues to the south of CA1 and there is no change in land cover and visual appearance south of Cabbage Tree stream (true left branch), see photo below.

We are concerned that locating the proposed new fence S-T will omit and possibly result in reduction in the extent of important low altitude snow tussock lands (a threatened environment) and result in fragmentation in a visual sense; ultimately, to weaken the landscape integrity of the range landscape.

Preferably, the land in the two hill blocks south of CA1 as far as the unnamed stream to the north of

Scour Stream, should be retained as conservation land (see Fig 1, below).

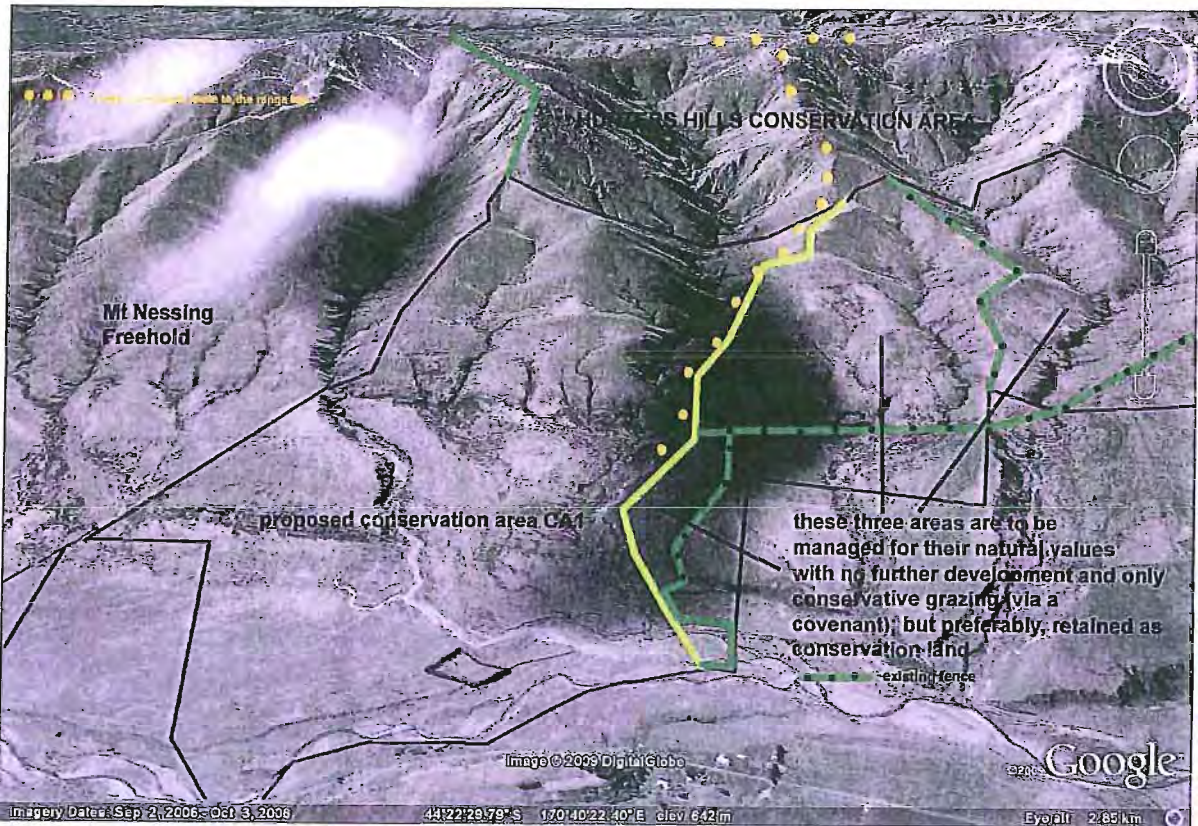


Figure 1

There is also the issue of the practicality of reinstating the existing snow fence as the upper boundary which will be discussed later in our submission.

Failing retention in Crown ownership, we ask that a protective covenant be placed over these two blocks, permitting only light seasonal sheep grazing use that protects and permits on going recovery of the snow tussock ecosystem and shrubland communities and retains and enhances the natural landscape character. We will discuss this issue further in the section on 'Proposed Freehold'.

The placement of the southern boundary fence to CA1 needs to ensure there is practical and logical access up Two Legged Spur as this is the most obvious and desirable route up on to the range tops (see Fig 1 above). The proposed alignment appears to provide for this but it needs to be ensured at the implementation stage

Requests and Recommendations:

The land in the two hill blocks, south of CA1, as far as the unnamed stream to the north of Scour Stream, be retained as a Conservation Area (see Fig 1 above).

There appears to be an issue about the practicality of reinstating the existing snow fence as the lower boundary to the Hunter Hills Conservation Area. Here we ask that this boundary of CA1 be reassessed and consideration be given to placing it at a lower level. This would enable the inclusion

of more lower altitude intact snow tussock grasslands into the Conservation Area. And, at the same time reduce the risk to a new fence line from snow drift damage and thereby reduce ongoing maintenance costs.

We ask for the retention of these areas in Crown ownership, however, if that is not ultimately achieved then, at the very least, there should be protective covenants over these two blocks as discussed above. And, we request, if covenants are agreed to, then only light seasonal sheep grazing should be permitted along with other restrictions which we discuss under "Proposed Freehold" in a later section.

We also request that the placement of the southern boundary fence, to CA1, will ensure practical and logical access up Two Legged Spur, as this appears to be the most obvious route up to the Range tops (see Fig 1 above). This may already have been provided for but it needs to be ensured at the implementation stage, so we ask that this please be done.

Qualified designations: Area CA1 is to be subject to an easement concession in favour of Hunter Hills Station Limited for water supply as a qualified designation under section 36(1)(a) Crown Pastoral Land Act 1998, labelled 'r-s', is acceptable.

2.1.2 Approximately 467 ha to be designated as land to be restored to or retained in Crown control as Conservation Area (shown shaded in pink and labelled CA2 on the plan included in the Proposal document) under Section 35(2)(b)(i) Crown Pastoral Act 1998 subject to qualified designations.

The Branch fully supports that this area of 467ha be restored to or retained in Crown control as a Conservation Area, with some provisos as discussed below.

Proposed CA2

We are very pleased to see the proposal to retain this area as conservation land, for its shrubland and tussockland values, including falcon habitat and a number of interesting and threatened plant and animal species. It also incorporates the dramatic gorge landscape of Two Mile Stream, and encompasses important high quality aquatic habitat. This proposal also protects a good portion of altitudinal sequence from lower slopes to the tops.

We do not see any problems with continuing to allow access through the area via the existing 4WD track for stock movement and farm management purposes, as we appreciate the way Hunters Hills property is split between a southern and northern property, with Hakataramea Downs and another smaller property separating the two existing freehold areas.

We note that the western boundary of this area is shown as a new fence. On our field trip we observed an existing electric fence along this alignment (see Photo 3 below).



Photo 3

We therefore presume that the 'new' fence U-V refers to an upgrade of this fence, to a more permanent sheep and cattle proof fence. If this is the case, the opportunity should be taken for an improved alignment. The whole of the true left branch of the Two Mile Stream should be included in CA2. There is little sense in protecting lower stream areas if there is still stock access (potentially cattle and deer) to upper portions. This would also better achieve protection of natural landscape character, intactness and coherence, by avoiding fragmenting landform and 'going against the grain'. We also note that the entire true right branch of Two Mile Stream has been identified as particularly important for insect habitat, as part of the whole CA2 area. The area should be protected as a whole.

We note that there is reference to a marginal strip along Two Mile Stream but that the CRR at p33 states there are no marginal strips within the property. We would expect that if there is a marginal strip on the property then it lies (eventually) along the stream all the way down to its confluence with the Hakataramea River. This would potentially allow public foot access, at least, up into CA2.

In the interim, we observe that CA2 is effectively landlocked for easy public access. We discuss this further in the next section

Requests and recommendations: here we request that the whole of the true left of Two Mile Stream be included into CA2, as discussed above.

And, we request that the entire true right branch of Two Mile Stream be protected, as a whole, because of its importance for natural values, in particular for its habitat for native insects.

Qualified designations: the proposed easement concessions for farm access, as set down in the document, are generally acceptable. However, we ask that our comments on marginal strips, as discussed above, be noted.

And, we also ask that our comments about CA2 being effectively landlocked for easy public access, be noted as well.

2.2 Land to be disposed of by freehold disposal to Hunter Hills Station Ltd.

Approximately 1605.9100 ha to be designated as land to be disposed of by Freehold Disposal to Hunter Hills Station Ltd as persons specified under Section 35(3) Crown Pastoral Land Act 1998 (shown edged green on the designation plan in the Proposal document) subject to a qualified designation.

Proposed Freehold

From our inspection of this area, we observed that large areas of snow tussock grassland are also included in this area, and this is also noted in the CRR (p.16). This is because the existing snow/retirement fence has been used as the proposed upper boundary. The CRR states these snow tussock communities have a dominance of indigenous species and high restoration potential (p16) and describes coverage as ranging from 20-75% (p14). This snow tussock is the most important because it is occurring at lower altitudes, as has been recognised in CA1. In places through the proposed freehold, we observed snow tussock occurring as low as 700m altitude especially on cooler aspects, similar to the altitude in CA1. We note the CRR at p6 records snow tussock down to 750m, 900m and 850m variously from the south end to the north end of the property. This appears to underestimate the extent of remaining snow tussock. Snow tussock at this altitude is the least common and most threatened, and requires protection, in our view, enabling recovery. Further loss of tall tussock has been identified in the CRR (p6) as a potential adverse effect of on-going land use.

The snow fence runs at around 1000m altitude. It is not well aligned to landform in a number of places (see Photos 7 & 8 below). Contrasting landuse over the fence line would highlight this unnatural line, especially through stock camps if Merinos are grazed.



Photo 7



Photo 8

The lessee advised us that the existing fence is in poor repair and is not stock proof, and that it suffers from snow damage. A new fence is therefore required in any case. It would be prudent to place the new fence at lower altitude where it would suffer less damage and be more accessible for repair. The opportunity can be taken to select an alignment that is more sympathetic to changes in landform and vegetation cover and achieve better protection of remaining lower altitude snow tussock and optimize its recovery potential.

We show a recommended new fence alignment on Figures 1 (above), 2, 3, 4 & 5 below.



Figure 2

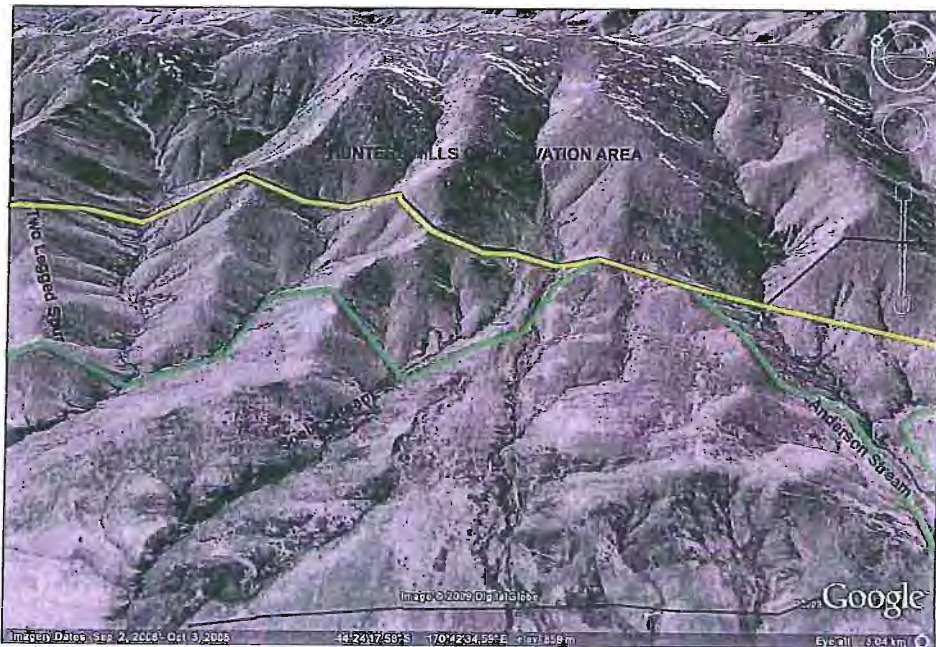


Figure 3



Figure 4

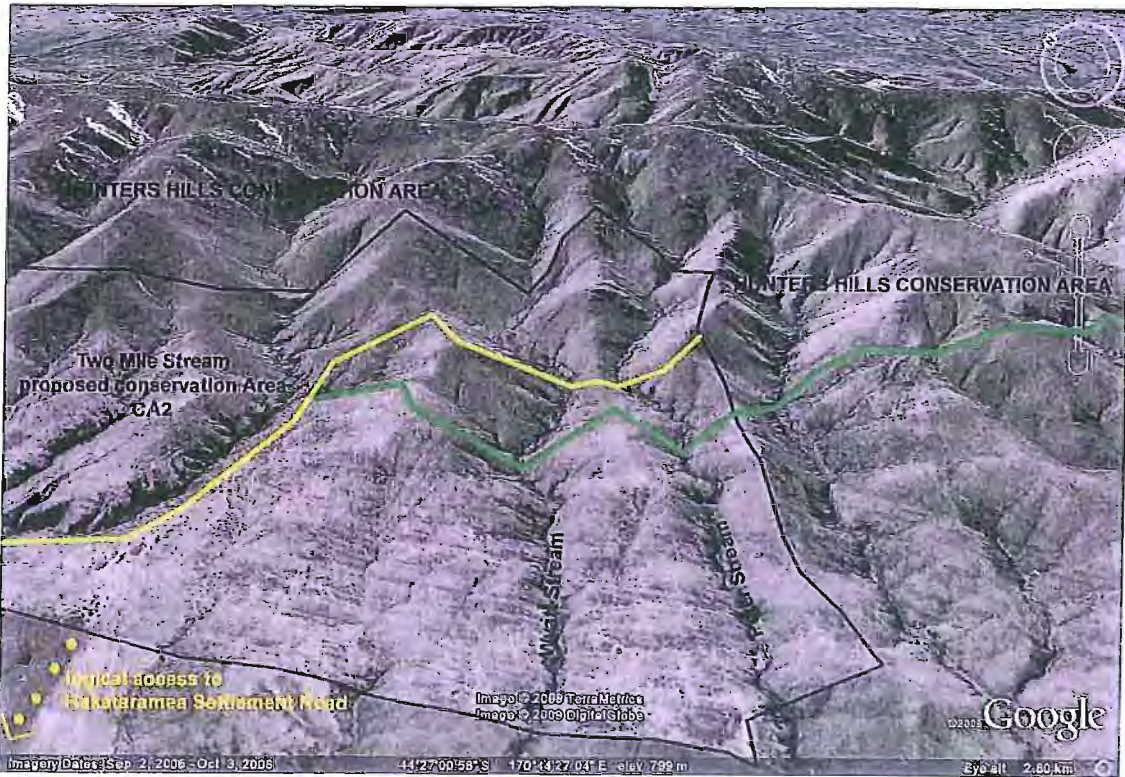


Figure 5

We also observed numerous native shrub species throughout the proposed freehold area, including a lot of coral broom, sometimes in high numbers, as well as *Coprosma intertexta*, in addition to the induced matagouri cover (from fertiliser) (see Photos 10 to 15). The two shrub species mentioned have a status of Gradual Decline and Sparse respectively.



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14



Photo 15

We also observed a lot of *Carmichaelia vexillata* throughout the area, classed as Serious Decline. Remaining populations of these species should therefore be protected. We do not agree with the conclusion in the CRR (pp 6-7) that increased shrub cover within the tussock grassland is an adverse effect. We see this trend as returning to a more representative and natural landscape character. It is possible however the writer was referring to increased induced matagouri growth, and in that case, we agree.

Casual observation of the intertussock areas showed a diversity of native species present. In the vicinity of the water tank up Scour Stream, on the sloping fan surface, a brief inventory noted around 20 native species present. We note that at p 13 in the CRR 10 species are listed as commonly present with a further 7 species as occasionally present, over gentler mid altitude areas, grading into higher altitude areas with 17 native species listed, and over 40 species observed in areas over 900m approximately.

The proposed freehold area also contains Anderson Stream (see Photos 9 below & 10 above) which has been identified as having significant shrubland values along its length, being representative of the originally occurring woody cover in the area and including large healthy populations of *Coprosma intertexta* ranked Sparse. We note black shags (Ranked Sparse) were also observed using this stream and that it is good falcon habitat (p 19 CRR). This stream also has high aesthetic values and would be desirable to visit and explore.



Photo 9

We ask that the Anderson Stream catchment be retained as conservation land (see Fig 4) to avoid loss of important vegetation communities and visual fragmentation. Retention of this area as crown land would also protect the altitudinal sequence and overall integrity of landscape. The existing 4WD track links it to CA2 thus providing a means of public access. The farm access easement would need to pass through here as well. Linking this area to CA2 lays the foundation for an interesting and easily achievable loop walk of high landscape and ecological interest.

A covenant should be placed over the proposed freehold area, limiting stock numbers to enable snow tussock recovery, prohibiting burning, preventing cultivation of areas with a presence of native species (a threshold of 15 or 20 native species in total may be appropriate – shrub, herb, grass); or presence of any species currently having a threat status) or tree planting (except naturally occurring native species); preventing spraying or clearance of native shrub species (except fertiliser-induced matagouri); and requiring a Native Shrubland Management Plan to be prepared by the new freehold owner. District plan rules cannot be relied on to protect shrubland and tussock once the land is freeholded.

An example of a blanket protection of shrublands is on Lake Hawea Station. The covenant condition reads as follows:

5. Notwithstanding clause 3 of the special conditions and 3.1.2 above, the Owners may spray and or burn areas of matagouri (under 1m tall) or bracken fern for the purpose of continued pastoral use.

The owner may also topdress and sow seed.

Clearance of any other native shrubs requires the approval of the Minister of Conservation.

The Shrubland Management Plan should contain the following:

- an inventory of species, communities and areas where there are populations needing management (base line survey)
- management strategy including planning for recovery and ensuring populations are not becoming senescent, and prevention of physical clearance or spraying
- provisions for monitoring and setting of benchmarks or indicators of recovery and self-sustaining populations
- provisions for modification or cessation of farming activity if the monitoring shows decline or failure to achieve bench marks

This plan should be prepared by an expert in dryland shrub ecosystems, and should be approved by the Minister of Conservation.

The exception to protection would be fertiliser-induced matagouri. This would be matagouri of uniform height and age, and under 1m tall. Spraying should not occur within 5m of any taller matagouri or any other shrub species within the lower stature matagouri or when there is any chance of spray drift onto non-target species. A buffer of matagouri should be left around desirable species, especially native broom, to prevent trampling, rubbing and browsing by stock. (Eg see Photo 15)

Requests and Recommendations:

We ask that some parts upper parts of the proposed freehold, be retained under Crown Control, either by inclusion into the existing Hunter Hills Conservation Area, or adding to CA1 and CA2.

We ask that the Anderson Stream catchment be retained as conservation land (see Fig 4) for the reasons discussed above.

As raised earlier we requested that when the existing boundary fence, between the pastoral lease and the Hunter Hills Conservation Area, is reinstated that it is moved to a more suitable fence line, down slope, so as to reduce the damage caused by snow drifts. And, at the same time enabling greater protection of intact lower altitude snow tussock grasslands.

With regards to all the areas that will eventually be freeholded, we ask that they have a covenant placed over them with appropriate stocking levels, by sheep only, in order to maintain the existing inherent natural tussock grassland cover and values. And we also ask that for the covenanted areas there be no spraying, no burning and no clearance or vegetation, except fertiliser induced matagouri. When clearing, such matagouri, spraying and clearing is not to come within 5m of any taller matagouri or other native shrub and tree species. Nor make any easier stock access to such plants to avoid trampling, rubbing and browsing. There also be on-going monitoring at regular intervals, in order to determine that the native vegetation is not being unduly modified with provisions for amendments to stocking rates and land management methods if needed.

Access:

CA2 is described as having "wild and scenic" character (p6 CRR) and would be an area people would want to visit with its white water streams, dramatic appearance and extensive shrublands and rock outcrop. We think there should be public access across the proposed freehold area enabling access between CA1 and CA2. It is asking too much that access be only by way of crossing across the tops and climbing down then up again to get out.

If secure and practical access is obtained up Two Mile Stream via marginal strip, this situation may be reviewed. But as it stands, CA2 is landlocked as far as reasonable and practical public access goes. We note that at p33 of the CRR it states there are no marginal strips, yet the two easement stream crossings at the south end assume presence of marginal strips.

An alternative logical and practical public access is along the track on the freehold property boundary between the road and the lower margin of the leasehold, which is proposed for freehold, and then via the 4WD track across to CA2. The track traversing the present leasehold property would also be an excellent walking, mountain biking and horse riding track. But needs to be a loop with access out to the road at the south end.

Qualified designation: the proposed easements which will provide for conservation management access, including by motor vehicle, along the existing farm tracks, to the proposed conservation land CA1 and CA2, as well as the existing Hunter Hills Conservation Area above the lease, is acceptable to the Branch.

We note that a gap has been left between 'f' and 'g' and also between 'l' and 'm' on the basis that the land along Anderson, Two Mile and Wyatt Streams are not included in the review due to the presence of existing marginal strips. We have an expectation that these marginal strips follow the waterway from the existing farm track right down to the existing public road. If this is so, then there could be public access up to the existing farm track from the public road. Can this access option be confirmed?

However, we would like to see much better access provided to the Conservation Areas, especially to the landlocked CA2 area. We ask that the existing farm track be used as an easement to provide public access between CA1 and CA2 with the possible exclusion of the public during lambing. And we also ask for exploration of a possible public access easement from CA2, through freehold land down to the existing public road. So as to provide a loop route for walking, mountain biking and possibly horse riding, or at least to the leasehold boundary at the top of this route laying a foundation for possible future access. This access would become unnecessary if practical secure access can be achieved via marginal strips along the streams.

In Conclusion:

Many significant natural values and outstanding landscape features exist on Hunter Hills Station. The Branch feels this review of tenure presents a once in a lifetime opportunity to protect and maintain these highly important values for the long term. Not only for the benefit and enjoyment of the present generations but also for the future generations that come after us. So that future generations will still be able to see and appreciate some of the near natural ecosystems and landscape vistas, that we have been privileged to see and enjoy

And, the Branch would like to thank Opus International Consulting Ltd, and Mark and Nikki Giles for allowing our group the opportunity to inspect this interesting pastoral leasehold land.

The Branch awaits with much interest the final decisions on the review of this tenure. And we trust full consideration will be given to this submission from the South Canterbury Branch of Forest and Bird, along with those of other interested groups.

Yours sincerely

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