

Crown Pastoral Land Tenure Review

Lease name: LONG GULLY

Lease number: PO 055

Public Submissions - Part 1

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

October

09

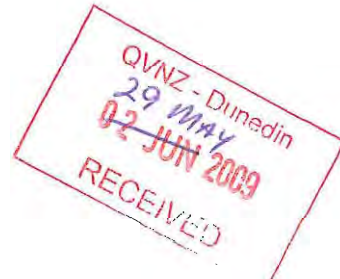


OTAGO CONSERVATION BOARD

Our ref: SBC-08-34

29 May 2009

Commissioner of Crown Lands
c/- Darroch Valuations
P O Box 215
DUNEDIN 9054



Attention: David Paterson

Dear Sir

SUBMISSION ON TENURE REVIEW OF LONG GULLY PASTORAL LEASE (Po 55)

The Otago Conservation Board appreciates this opportunity to comment on the Preliminary Proposal for the review of Long Gully Pastoral Lease and would like to thank the Commissioner of Crown Lands for an extension to the submission deadline and the leaseholder for permission to visit the area.

The Otago Conservation Board (OCB) is appointed by the Minister of Conservation to represent the wider Otago community in advocating for the protection of biodiversity and the conservation of natural and historic resources throughout Otago. The board takes a strong interest in tenure review and makes submissions on all preliminary proposals.

The Long Gully pastoral lease occupies the spectacular southwest flanks of the highly visual Grandview Range, a dominant part of the Upper Clutha vista. The vegetation mosaic of matagouri, grassland and kanuka pockets found on these flanks is a classic landscape feature of the region.

The proposed creation of conservation areas and the provision of public access as an outcome of this review will protect significant and representative areas of natural communities of the Grandview Range, facilitate enjoyment of the area, and open up excellent recreational opportunities.

The Otago Conservation Board supports the proposal and the proposed tenure designations (with the exception of the proposed 95 ha Landscape Covenant Area), as they will produce tangible conservation and access benefits. We do however have concerns about some of the specifics, which we would like to see addressed.

Specific comments on the Preliminary Proposal are as follows:-

Land to be restored to full Crown ownership and control

1.1 Proposed Conservation Areas CA1 and CA2 (approx 150 ha.)

(These are incorrectly referred to as CA2 & CA3 in the proposal document but labelled correctly on the map).

This area is a steep gully rising from the glacial terraces all the way to the crest of the range. It preserves a full altitudinal sequence as well as the best examples of indigenous habitats remaining on the lease area. It also contains several threatened or restricted species of note. Healthy stands of native broom are a particular feature of this area and will be a valuable addition to public conservation land.

While the wedge of proposed freehold land between these two conservation areas is less than ideal, the board accepts that it is important for farming operations. Apart from this reservation, the board fully endorses the proposed creation of these two conservation areas.

1.2 Proposed Scientific Reserve (R1 Scientific) (approx. 165 ha)

The board supports this proposal and the proposed easements for farm use. This wide open and undeveloped space is an essential part of the character of Central Otago.

Land to be disposed of by freehold

1.3 Land to be disposed of by freehold (approx. 1373 ha)

The relinquishing of this area to freehold is acceptable, as adequate provision for protection of representative biodiversity has been made in the proposed conservation areas. Provision for some public access to the range crest has also been made.

There is however the question of landscape protection. As mentioned in the introduction, the mosaic of matagouri shrublands and grasslands on the flanks of the range is a feature of the Upper Clutha basin, and it would be a great loss to the character of the basin if the matagouri was to be lost as a result of spraying and clearance for farming purposes. It is also recognised though, that the matagouri has itself probably benefited and spread due to topdressing. Finding a balance between preserving the character of the land, while allowing a sound farming regime, is a challenge, but it is possible. It would be a tragedy if the matagouri were to be cleared completely.

The board requests that a landscape covenant be placed on the highly visible southwestern flanks of the proposed freehold area, to protect against wholesale removal of the matagouri shrublands.

1.3.1 Landscape Covenant - marked CC(Landscape) (approx. 95 ha)

This area covers the high altitude tussockland leading up to the crest of Grandview Range. The board believes this area should be protected for habitat, biodiversity and soil and water purposes, as well as the proposed landscape purposes.

If a suitable all-embracing conservation covenant guaranteeing protection of all these values can not be negotiated, then it merits designation as a separate conservation area.

1.3.2 Proposed easements for public and conservation management access

The board supports all the proposed easements, as they will provide excellent recreation opportunities and make a significant contribution to a network of tracks along the range.

Although access g-f is not very far from access to the range crest on Sandy Point Station, it is valuable as it follows a formed track, which will facilitate mountain-bike use.

The board also supports other access provisions outlined in 1.3.3 to 1.3.8 for farming and telecommunications purposes.

It is disappointing that provision for public 4WD access has not been made up Long Gully to the range crest, using the existing transmitter maintenance road. As yet, there is no public access to the range crest by 4WD vehicle, and it is sad that such a dominant and spectacular feature as the Grandview Range is denied to all those other than the fit and healthy.

We would also like to record here, that the map provided with the tenure review proposal by QV is substandard and difficult to interpret. In our view, it falls a long way short of the standard of map required for such an important and far-reaching document. The master map should be of a much larger scale and any inserts should be on following pages

Discussion of proposed designations and freehold proposal

Overall, the Long Gully pastoral lease tenure review preliminary proposal has a good balance between the protection of areas of biological significance and the retention of an economically-viable farm unit. The provision of access arrangements will be of significant benefit to the general public.

However, it is important to remember that these various easements and covenants are not just with the existing leaseholder, but with whomever the future owners may be several generations down the line. Accordingly, it is essential that any agreements are clear, reasonable, secure, and binding.

For this reason, in addition to the conservation areas and covenant proposed, the board would like to see stronger protection of the high-altitude tussock area (marked as CC Landscape) by way of either strong covenant conditions (exclusion of cattle, maintenance of tussock cover) or retention as a conservation area.

We would also like to see a CC landscape covenant placed on the highly visible western flanks, to prevent wholesale removal of the matagouri shrublands.

In conclusion, the Otago Conservation Board supports the bulk of the Preliminary Proposal, with the addition of the recommended modifications discussed above, as it will produce significant conservation outcomes, provide good public access and recreational opportunities, and preserve a viable farming operation.

We appreciate the opportunity to provide comment on this proposal and we are willing to elaborate on any of the issues we have raised.

Yours faithfully



Hoani Langsbury
Chairperson

**TENURE REVIEW LONG GULLY
UPPER CLUTHA TRACKS TRUST SUBMISSION**

To: David Peyton,
Tenure Review Contract Manager,
Opus International Consultants Ltd.,
Private Bag 1913,
Dunedin.

NAME:

Upper Clutha Tracks Trust
C/o John Wellington
272 Ballantyne Rd
RD2
Wanaka 9382



ADDRESS FOR SERVICE/POSTAL ADDRESS:

C/o John Wellington
272 Ballantyne Rd
RD2
Wanaka 9382

LONG GULLY TENURE REVIEW PRELIMINARY PROPOSAL

The property is Pastoral Lease land, being Run 236J and Crown Land adjoining and intersecting Pt Run 236J.

The Preliminary Proposal provides for:

- 1 An area of 150 hectares (approximately) to be designated as land to be restored to or retained in full Crown ownership and control, as Conservation Area (shown edged in pink and labeled "CA2" and "CA3" on Plan in Schedule A) under Section 35(2)(a)(i) Crown Pastoral Land Act
- 2 An area of 165 hectares (approximately) to be designated as land to be restored to or retained in Crown control, as a Scientific Reserve shown edged in pink and labeled "R1(Scientific)", on Plan in Schedule A) under Section 35(2)(a)(ii) Crown Pastoral Land Act 1998.
- 3 An area of 1373 hectares (approximately) to be designated as land to be disposed of by freehold disposal to Bendigo Station Limited, subject to protective mechanisms and qualified designations (shown edged in green on Plan in Schedule A) under section 35(3), section 36(3)(b), section 36(3)(c) and section 40 (1)(b) Crown Pastoral Land Act 1998

1. **Protective mechanisms:** Proposed easements for public and conservation management access.

An easement under Section 7 Conservation Act 1987:

(i) to provide public access for persons on foot, or on or accompanied by horses, or by non-motorised vehicles powered by a person or persons, provided however that persons with guns and persons accompanied by dogs are permitted to use the easement area provided they have a hunting permit issued by the Department of Conservation over that part of the land shown marked as "a-ai-b-cd-e-f-p" and "f-g"," on the Plan attached in Schedule A.Po 55 Long Gully Pastoral Lease

(ii) to provide access for tenants, agents, contractors and invitees of the Minister and any employee or contractor of the Director-General of Conservation on foot, or on or accompanied by horses, or by motor vehicle, with or without machinery and implements of any kind, and with or without guns and dogs, for management purposes over that part of the land marked "a-ai-b-c-d-e-f-p" and "f-g", on the Plan attached in Schedule A.

The easement will provide for public access to the proposed conservation area. The easement will join onto an existing easement running through Sandy Point and along the Grand View Range through Glenfoyle, Mt Grand and Lake Hawea Station should tenure review be successfully concluded on the later two properties.

THE UPPER CLUTHA TRACKS TRUST

The Upper Clutha Tracks Trust's objects are

"to promote, support, fund and advocate for the establishment of:

- 1 a functional interconnected network of tracks for walking, hiking, cycling, mountain biking, horse riding, roller skating, and any similar recreational leisure activities in the Upper Clutha area, whenever such trails will contribute to the social, cultural, environmental or economic wellbeing of residents or visitors to the District.
- 2 the roading network for commuter and recreational road cycling.

The Trust also endorses, and works to achieve the QLDC strategy for Walking and Cycling in the Upper Clutha Basin.

The stated goals of the Strategy are

- 1 Make Walking and cycling an attractive and safe option for getting around the Upper Clutha area
- 2 Promote the opportunities for walking and cycling in Upper Clutha.
- 3 Ensure that the needs of pedestrians and cyclists are always fully taken into account in the Council's land use and transport planning, recreation planning, urban design, engineering and land development process.
- 4 Deliver a consistent approach to walkways in the Upper Clutha by working in partnership with other landowners agencies and interested parties.

The first goal states further the objective

1. To continue to expand the walking and cycling infrastructure network in the Upper Clutha area using this strategy as guidance, but also responding to emerging needs and opportunities.

THE UPPER CLUTHA TRACKS TRUST SUBMISSION:

The Trust regards the creation of the proposed Conservation Area as an important addition to the Conservation Estate in the area, offering important heritage, biodiversity and recreational values.

In line with Trust objectives, the following submission deals only with issues of access to the proposed area.

A. Proposed Easements:

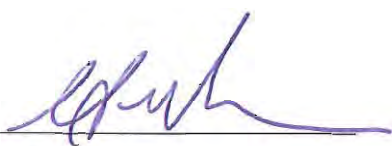
The Preliminary Proposal provides for easements to provide access to the proposed Conservation areas. The easements provide for both public access and management purposes.

The easements proposed will also create links to adjoining properties that will allow for extended tracks to be created when these properties complete the tenure review process at some point in the future.

The Trust notes that on the map the easement "f-p" does not appear to connect to the public access easement over the formed track that was created out of the Sandy Point Tenure Review. This is the existing track shown on the NZMS map 260-G40 that intersects the boundary to the NE of spot height 1046. This connection will be a vital part of the public access network through this and adjoining properties. The Trust believes that this is just a map drafting issue but to be sure, the Trust submits that this access be created by easement if it is not part of the initial proposal.

The Trust further wishes to ensure the easement "f-p" will also provide access to the conservation area CA2. The map shows the easement running close to the conservation area, but it is not clear that there is access between the two.

Subject to the clarification or amendment as required, the Trust supports all the easements proposed and believes that these provide good access to the adjoining land managed by the Department of Conservation on the public's behalf.

Signed: 

Date: 22/4/09

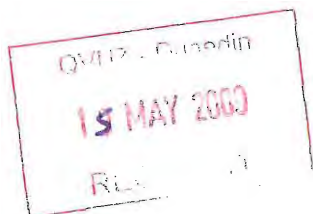
John Wellington
Trustee



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

Patron:
His Excellency The Hon
Anand Satyanand, PCNZM
Governor General of New Zealand

15 May 2009



The Manager
QV Valuations
PO Box 215
DUNEDIN

FAXED

Attn.: David Paterson

Dear Mr Paterson

RE: LONG GULLY PASTORAL LEASE TENURE REVIEW

Thank you for your letter of 16 March 2009 concerning the above.

The NZHPT is a Crown Entity and is New Zealand's lead agency in historic heritage management. Its purpose is to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand, as provided for in Section 4(1) of the Historic Places Act 1993. The NZHPT's powers and functions are set out in Section 39 of the Historic Places Act.

NZHPT has developed guidelines based on internationally recognised best practice to assist in the identification and protection of historic heritage values. This includes a specific guideline on the undertaking of archaeological assessments. NZHPT monitors 'one off' opportunities such as this to ensure that the Crown's commitment to the identification, recognition and protection of significant inherent historic heritage values on pastoral lease lands subject to the tenure review process, is adequately dealt with.

NZHPT has the following comments to make with respect to the Long Gully pastoral Lease proposal:

- NZHPT believes from the very brief 6 line assessment of Historic values in the January 2006 Conservation Resources Report, indicates that very little investigation of historic heritage has been carried out, and certainly there has been no systematic historic or archaeological site investigation for this pastoral lease.
- NZHPT believes that more should have been done in a practical manner to further investigate the historic and archaeological sites that are present on Long Gully pastoral Lease, and these need to be more thoroughly investigated in order to properly inform this preliminary proposal.
- The presence of the old stone sheepyards and the tailings areas are of significance as archaeological sites. The record of them should have been an indicator that further investigation was needed.
- NZHPT has undertaken its own desktop check of the New Zealand Archaeological Assn site record database and determined that there are five, but possibly six, archaeological sites currently recorded on Long Gully pastoral Lease.
- NZHPT reminds the Commissioner that historic heritage and archaeology on pastoral leases is not confined to goldfields evidence and that it also includes

evidence of pastoral history ie. old homesteads and yards, early trig points and fence lines.

It is the NZHPT view that a more thorough field based historic and archaeological assessment should have been undertaken to properly assess and recommend appropriate levels of protection for historic heritage values identified on Long Gully pastoral Lease. .

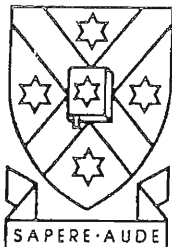
The Crown has an obligation to both the lessee and the public to properly inform itself of significant inherent historic heritage values on Long Gully pastoral Lease, prior to any disposal. Where appropriate it can then seek adequate protection measures as part of the tenure review. In this instance, it appears a more thorough investigation of historic heritage values should have been completed prior to this stage.

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

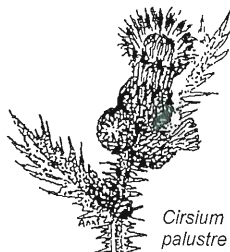
Yours sincerely

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

Owen Graham
Area Manager (Otago/Southland)



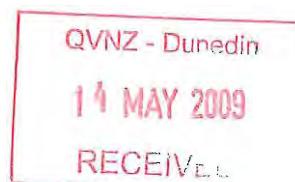
J. Bastow Wilson
Botany Department
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PO Box 56
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Phone: +64 3 479 7572

2009 May 13.

The Manager,
QV Valuations,
Dunedin.



Dear Sir,

I have seen the proposed tenure review for the Long Gully Pastoral Lease.

I am very familiar with the type of lowland vegetation in the area, since I have been conducting research in similar vegetation in the area since 1988. This is an ecosystem which is threatened more than almost any other in New Zealand. It has been severely depleted by agriculture, to which it had little resistance. There are very few reserves of it. An additional reserve would be of considerably significance, and Scientific Reserve seems an appropriate designation.

One minor point: the easement provided for stock access must be well fenced to keep stock out of the reserve (with permission for those who have permission to access the reserve to cross it).

I strongly support the proposal for this Scientific Reserve.

Yours truly,

J.B. Wilson,
Head, Department of Botany.

264005

The Commissioner of Crown Lands
C/- QV Valuations,
Dunedin Office,
PO Box 215
DUNEDIN.



**FOREST
& BIRD**



Dunedin Branch

PO Box 5793
Dunedin

11.5.09

Dear Sir,

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

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

Yours sincerely

Janet Ledingham

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

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

Submission on the Preliminary Proposal for Long Gully Pastoral Lease

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

This submission is written on behalf of the Dunedin Branch of the Forest and Bird Protection Society which has approximately 1000 members, many with strong interests in the High Country values and recreational opportunities as well as in botany and natural history in general. Many of the members enjoy active recreation in the back country and are very aware of the need to ensure the protection of natural values, vegetation and landscape, historical sites and to improve public access through the tenure review process.

The submission is written with reference to the objectives of tenure review as set out in the Crown Pastoral Land (CPL) Act 1998, and the 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.*

Introduction

The tenure review of Long Gully and Deep Creek leases will provide increased recreational possibilities through the proposed access provisions as well as providing landscape protection for the parts of the leases that are visible from the main tourist routes to Wanaka and the Lindis Pass. The Long Gully review will also result in several Conservation Areas and Scientific Reserves to protect both lowland and high country values which we welcome.

The proposal:

The proposal:

1.1 CA2 & CA3 NB. *(Presumably this refers to the CA1 and CA2 designations on the map included in the proposal ?)* An area of 150 hectares (approximately) to be designated as land to be restored to or retained in full Crown ownership and control, as Conservation Area labelled "CA 2" and "CA 3" on Plan under Section 35(2)(a)(i) Crown Pastoral Land Act 1998.

The CAs include the catchment north of point 952m, and west of the ridge down to the bottom of the hill close to the Luggate-Tarras Road and within them there are a number of important vegetation communities including a number of threatened plant species.

We note that the area ranks highly against the PNAP criteria for representativeness, diversity and rarity. It ranks moderately for buffering, size, naturalness, and long term viability. There are a number of threatened species in this proposal, and all of this supports designation of this area as a Conservation Area.

As stated in the CRR, the native broom shrublands are a feature of this area and were recognized as part of RAP A13 (Long Gully). There are a number of other habitats within this proposal. These include the mid altitude grey scrub shrublands with the nationally endangered *Carex inopinata*, and

the higher altitude kanuka shrubland associated with rock outcrops and colluvial slopes.

The PNA Report stated:- *“Shrubs, particularly native broom and matagouri with occasional kanuka, Melicytus alpinus, Coprosma parviflora and C. crassifolia are lightly scattered across most of these communities. Matagouri – Coprosma propinqua shrubland with a ground tier of exotic grasses occupies small sections of the lower fluvies. Native broom forms two concentrations, near the lower margin, and near the top of the area where cover is 15-30%”.*

“Flora is more diverse than is typical for the District at this altitude, but no uncommon species are noted. This small RAP contains a good range of communities representative of lower altitude colluvial slopes, here in more natural condition than elsewhere at equivalent altitude, and with an unusually high diversity of native species.

The only examples of native broom shrubland in the Lindis, Pisa and Dunstan Districts occur in this priority area and nearby”.

RAP A13 (Long Gully) was ranked ‘High’ for representativeness on account of its *“important low altitude slope communities”.*

We would submit that CA1 and CA2 should be joined together with the easement ‘f – g’ as shown on the designation plan across the combined area of CA1 and CA 2.

We fully support the creation of CA1 and CA2 as Conservation Areas to protect all the values outlined in the CRR and in the RAP descriptions but suggest they should be joined as one CA.

1.2 An area of 165 hectares (approximately) to be designated as land to be restored to or retained in Crown control, as a Scientific Reserve labelled “R1(Scientific)” on the Plan under Section 35(2)(a)(iii) Crown Pastoral Land Act 1998, subject to a qualified Designation.

The proposed R1 covers the majority of the native and semi native river terraces of Long Gully, between the Clutha River and the Luggate – Tarras Road and has within it one of the few remaining areas of dryland valley terrace systems.. The values had previously been identified by PNAP Surveys, as RAP A14 (Long Gully Terrace).

The PNAP Report on RAP A14 stated that *‘Its size should allow sufficient buffering from outside influences’*, and the RAP was ranked ‘High’ for representativeness on account of its being a good *‘example of semi-arid terrace flats flora and fauna’.*

Since there is very little of this dryland vegetation in its natural state currently protected and that the area retains significant natural character (with the potential to recover with appropriate management) it certainly warrants the protection of a Scientific Reserve.

We strongly endorse the proposal for the R1 Scientific Reserve.

Qualified Designation:

An easement concession under section 36(1)(a) Crown Pastoral Land Act to provide access for Bendigo Station Limited for farm management purposes and the right to convey water over that part of the land marked “i-j” in “R1(Scientific)” on the Plan.

We have no objection to this proposed concession to allow for stock movement and the flow of irrigation water along the proposed easement.

1.3 An area of 1373 hectares (approximately) to be designated as land to be disposed of by freehold disposal to Bendigo Station Limited, subject to protective mechanisms and qualified designations.

We note that pastoral farming, oversowing and topdressing have modified the vegetation in the proposed freehold area. There has been some cultivation in the se corner of the lease and problems with rabbits and hieracium infestation. We also note that much of the proposed freehold land is classified as LUV Class VI and therefore should be capable of supporting ecologically sustainable pastoral use. The lowland freehold blocks are currently extensively farmed.

We have no objection to the proposal to freehold 1373 ha subject to protective mechanisms and qualified designations.

Protective mechanisms pursuant to Section 40(1)(b) and Section 40(2)(a) and Section 40(2)(b) Crown Pastoral Land Act 1998.

Landscape Covenant:

A conservation covenant under Section 77 Reserves Act 1977 for the purposes of protecting the landscape values of the area marked "CC(Landscape)" on the Plan.

We support a landscape protection covenant over an area of 95ha at the north eastern corner of the proposed freehold to protect the natural landscape values in the area.

We believe however that the Covenant should be extended to cover the land identified as landscape Unit LU2 in the CRR which is part of the backdrop from the State Highway tourist routes to the Lakes and the Lindis Pass.

We believe that the terms and conditions of the Covenant do not provide satisfactory protection with the condition to require Minister of Conservation consent for buildings, earthworks, exotic tree planting and burning or spraying of shrub lands. We believe the above activities should be totally prohibited by the conditions of the Covenant.

We endorse the proposed landscape covenant with strengthened conditions and the addition of the LU2 landscape unit identified in the Conservation resources report.

Qualified Designations pursuant to Section 36(3)(b) Crown Pastoral Land Act 1998.

1.3.2 Public Access and Minister of Conservation Management Purposes Easement in Gross.

(i) An easement to provide public access for persons on foot, or on or accompanied by horses, or by non-motorised vehicles powered by a person or persons, provided however that persons with guns and persons accompanied by dogs are permitted to use the easement area provided they have a hunting permit issued by the Department of Conservation over that part of the land shown marked as "a-ai-b-c-d-e-f-p" and "f-g", on the Plan attached in Schedule A.

We support these provisions for public access but would ask that in addition serious consideration be given to allowing public vehicle access up the road to the Telecom site to a car park in the region of the transmitter site, i.e. from 'a'-ai'. This would then allow less fit and able people to gain easy access to the ridge-tops to allow for pleasant day trips on both Long Gully and Deep Creek.

(ii) To provide access for tenants, agents, contractors and invitees of the Minister and any employee or contractor of the Director-General of Conservation on foot, or on or accompanied by horses, or by motor vehicle, with or without machinery and implements of any kind, and with or without guns and dogs, for management purposes over that part of the land marked "a-ai-b-c-d-e-f-p" and "f-g", on the Plan attached in Schedule A.

We support the above easement

1.3.3 Continuation in force of an existing right to convey water granted to Lindis Irrigation Limited.

We do not object to the continuation of this existing right.

1.3.4 Continuation in force of an existing right to convey electricity granted to Aurora Energy Limited.

We do not object to the continuation of this existing right.

1.3.5 Continuation in force of existing right of way granted to Telecom New Zealand Limited.

We do not object to the continuation of this existing right.

1.3.6 Continuation in force of existing right of way granted to Vodafone New Zealand Limited.

We do not object to the continuation of this existing right.

1.3.7 Continuation in force of existing right to convey electricity granted to Vodafone New Zealand Limited.

We do not object to the continuation of this existing right.

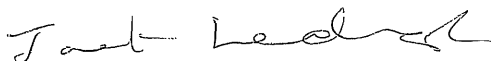
1.3.8 Continuation in force of existing right of way granted to Team Talk Limited.

We do not object to the continuation of this existing right.

Marginal Strips

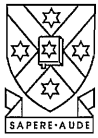
We note that the Clutha River is the only qualifying waterway.

We would like to thank QV Valuations, for making arrangements for us to inspect the property, and the runholder for giving us permission.



Janet Ledingham,

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

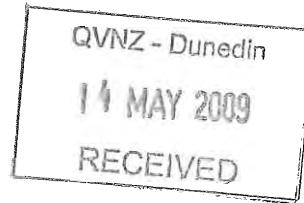


Department of Botany

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May 12, 2009.

Manager,
c./o QV Valuations,
PO Box 215,
DUNEDIN.

SUBMISSION ON PROPOSED TENURE REVIEW: LONG GULLY PASTORAL LEASE

Dear Sir,

Thank you for sending me a copy of this document and I appreciate the opportunity to comment on it based on my good knowledge of the general area involved.

The overall thrust of the proposal for this 1688 ha property, to return to full Crown ownership and management control, some 315 ha to be transferred to full Crown ownership and control in three blocks (CA 1, CA 2 [as shown on the attached map but are presumably the same areas given as CA2 and CA3 in the text] plus a Scientific Reserve, R1), with a qualified designation, and with the balance of the property (1373 ha) to be freeholded subject to some protective mechanisms and qualified designations, is clearly in favour of the proposed freeholding. The small corridor separating the two proposed conservation areas, however, should not be freeholded, as explained below.

Of the two Conservation Areas proposed, totalling c.150 ha, the area CA2 appears to embrace the 40 ha recommended for protection as the Lindis RAP A13: Long Gully in the Lindis, Pisa, Dunstan PNA Report of 1994. It contains areas of indigenous broom (*Carmichaelia vexillata* - *C. crassicaule*) shrublands with localised areas of kanuka (*Kunzea ericoides*) shrubland at higher altitudes, associated with rock outcrops and colluvial slopes. There are also several recognised threatened indigenous plant species within these areas so that collectively, this proposal is important and significant for low altitude vegetation and biodiversity (floral and fauna) conservation and is strongly endorsed. The PNA report describes the heritage values of this area in glowing terms. The proposed new fencing is an important aspect of this proposal. The small corridor of land separating these two proposed conservation areas is a major impediment of this proposal, not shown in the earlier recommendation. I strongly recommend that this corridor should be removed, while providing for an easement (shown as "f-g" on the earlier designation plan) across an enlarged single conservation area.

The proposed Scientific Reserve R1 of some 165 ha appears to essentially coincide with the Lindis RAP A14: Long Gully Terrace, apart from a relatively small part on the SE corner, on the opposite (eastern) side of the road which appears to be part of the adjoining property. This proposed reserve represents a now rare example of a semi-arid lowland river terrace in a relatively undisturbed state, which still contains a good range of indigenous plant communities and species and hopefully with a potential to further improve under appropriate conservation management. Scientific reserve status is clearly appropriate for this isolated roadside area, and thus is strongly endorsed. It appears to be presently fenced but the Qualified Designation, being a 20 m-wide strip between the road and the

proposed reserve, to provide for stock movement and also a separate easement to convey water over the NW corner of the reserve (marked "i-j" on Diagram B) for use by Bendigo Station Ltd., are approved. The proposed stock-access easement, however, must be fenced along the reserve boundary and provision made for public access on to the reserve from the highway.

The proposal to freehold the remaining 1373 ha with certain Protective Mechanisms and Qualified Designations is of some concern. Landscape protection of the natural values from inappropriate subdivision, use and development on the c.95ha on the upper slopes of the NW corner of the property, such as any buildings, earthworks, exotic tree planting or burning or spraying of shrublands, is an important aspect of the overall proposal and should be implemented as a formal 'prohibition requirement' rather than through a provision of 'Ministerial approval', as proposed.

The easement provisions for public access for persons on foot or mountain bike or horse, as well as for management purposes, to new conservation lands from Point "f" down to the Tarras-Luggate highway and, pending successful outcome of tenure reviews on other properties in the vicinity along the Grandview Range as far as Lake Hawea Station, are endorsed. Similar public access is also supported over the route "a-ai-b-c-d-e-f-p", as is the requirement that anyone in possession of firearms to be required to have a relevant permit. Continuation of all existing rights: to Lindis Irrigation Ltd to convey water, to Aurora Energy to convey electricity, to Telecom N.Z. Ltd., to Vodafone N.Z. Ltd. and to Team Talk Ltd. for access, and to Vodafone N.Z. Ltd to convey electricity, are all approved. In addition, public access by 4WD vehicle (or mountain bike or horse) should also be provided to both of the translator tower sites (Telecoms and Vodafones), with parking provisions near both sites. Note the existing access to both sites is suitable for 4WD vehicles and vehicle access for the public to these sites would be a much appreciated facility for most recreationists, particularly for those in my aging section of the population! I look forward to such provisions being agreed to by both companies which may be willing to create suitably fenced parking areas as close to the summits as practicable.

I trust that this response and recommendations will be given serious consideration and I thank you again for the opportunity to assess and comment on these proposals for tenure review.

Yours sincerely,



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