

## **Crown Pastoral Land Tenure Review**

**Lease name: RICHMOND**

**Lease number: PT 087**

### **Public Submissions - Part 17**

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

**January**

**06**

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Hermann Frank  
Fairview Road, RD 2  
Timaru 8621  
New Zealand



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Phone/ Fax 0064 3 684 5399  
e-mail: itod03@paradise.net.nz

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16 October 2005

Tenure Review Team Leader  
QV Valuations  
PO Box 13 443  
Christchurch

Dear Mr Dench

Re: Submission on preliminary tenure review proposal for Richmond pastoral lease

I come to the Mackenzie Country and to Tekapo in particular for work reasons on a regular basis and my family and I have spent holidays in Tekapo as well. Having travelled over the Burkes Pass it is always special to enter the vast and unique landscape of the Mackenzie Basin. Within this basin Lake Tekapo and its surrounding ranges are distinct and highly visible features.

In the context of the above tenure review it is the Richmond Range in particular which forms a dominant enclosure on the eastern side. It can be seen from the Tekapo township including the Church of the Good Shepherd and from many other viewpoints. One of them is Mount John from where the east side of Lake Tekapo and the ranges as a backdrop form a spectacular landscape. The areas under discussion are not only of very high landscape value, but also of significant ecological and recreation values. Any changes, particularly on Crown land, should at least maintain the current high values or where possible enhance them or even reverse negative impacts of past developments.

It is for these reasons that I would like to comment on the proposals for the Richmond tenure review.

As I understand it is proposed that ca. 1590 ha are restored to full Crown ownership and control as a conservation area, ca. 1995 remain under Crown control as a pastoral lease and ca. 6000 ha would be disposed as freehold land.

I support the creation of conservation areas, but oppose the freeholding of land, especially in the proposed extent. This would have significant negative consequences for the landscape, recreation and ecological potential of this area.

### **Landscape**

Once freeholded the land is at risk being developed into more intensive farm use including farm tracks, fence lines, forestry and, in the future, being subdivided for lifestyle blocks and holiday homes. The Mackenzie District Plan, the Resource Management Plan and even the Lakeside Protection Area have only a very limited control over these sorts of developments. The Mackenzie District Plan was prepared well before the current boom.

Subdivision in the Mackenzie District has increased significantly in last few years and it is most likely that the pressure on land development will continue to increase. This will apply especially to the land between Lake Tekapo and the Lilybank Road.

Buildings in the Lakeside Protection Area though they need resource consent are considered a discretionary activity, so this could be granted permission depending on the type and scale. Outside the Lakeside Protection area the land would be even more open to uncontrolled subdivision and building activities.

### **Recreation and public access**

There is hardly any conservation land with public access along Lake Tekapo (nor at the other lakes in the Mackenzie Country). The proposal has about 10 kms of shoreline planned for freehold with no public access along this stretch from Lilybank Road to the lake which shows that there is no consideration given to public access and the future potential for recreation.

Water is a major factor for public recreation and the enjoyment of the outdoors, starting from painting and picnicking to walking and tramping. This is of importance for the local population and for tourists, particularly with the close proximity of Tekapo. It has the potential of becoming a highly valued focus for the future in the district

There are other pastoral leases around the lake under tenure review. If the above proposal would be applied to all of them, nearly all land along the lakeshore would be in private hand. This cannot be seen as in the public interest considering it is Crown land we are talking about.

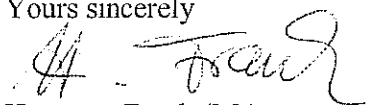
### **Conservation**

The proposal seems only to protect the areas which have little value to farming, but leaves other areas of significant ecological value open to negative changes. These include extensive tussock areas, tarns and other wetlands to the north of Round Hill skifield road, Washdyke Stream and its shrublands, other streams with their wider margins and the tussock and shrublands at the foot of Richmond Range above the mid slope fence at around 880 metres. These areas deserve protection

### **Summary**

For the reasons mentioned above I oppose the proposal to freehold the land, particularly between the lakeshore and the Lilybank Road. This could be retained as pastoral lease land which would allow farming to continue. I support the establishment of the new conservation areas, but they need to be extended to include other areas of ecological values as described above.

Yours sincerely



Hermann Frank (Mr)

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**FOREST  
& BIRD**

ROYAL FOREST AND  
BIRD PROTECTION  
SOCIETY OF  
NEW ZEALAND INC

South Canterbury Branch  
Royal Forest and Bird Protection Society of NZ Inc.  
29a Nile St  
Timaru

**RECEIVED**  
19 OCT 2005  
Quotable Value, N.Z.

16.10.05

Barry Dench  
Team leader- Tenure Review  
Quotable Value Ltd  
P.O.Box 13 443  
Christchurch

Dear Barry Dench

**Re: Richmond Tenure Review: Preliminary Proposal**

Thank you for sending the Branch a copy of the public information report for the Richmond preliminary proposal. Please find the Branch's submissions on the preliminary proposal below.

The South Canterbury Branch's area of interest covers Richmond and the catchment and landscapes of Lake Tekapo. And, the Branch fully supports the Society's objectives "*to take all reasonable steps within the powers of the Society for the protection and preservation of indigenous flora and fauna and natural features of New Zealand for the benefit of the public including future generations.*

*"Protection of natural features includes indigenous forests, mountains, lakes, tussock grasslands, wetlands, coastlines, marine areas, off shore islands and the plants and wildlife found in those areas."*

The Branch and its members took part in the early project to protect the wetland habitats of the highly endangered black stilt, by helping with the construction of predator proof fences around both Mail Box Inlet and Micks Lagoon. And it has submitted on several Tenure Reviews proposals within the Mackenzie Basin, on the Proposed Mackenzie District Plan and on various applications covered by the Resource Management Act. As well, our members have taken part in regular wilding tree removal days, on several Pastoral Lands properties in the Mackenzie Basin. The Branch has long held a strong interest in the welfare of the inherent values, and concern for their continued long term maintenance, of the special features that make the Mackenzie Basin and in particular Richmond and Lake Tekapo Catchment an unique part of the New Zealand landscape and environment.

**2. Preliminary Proposal**

The Branch understands the preliminary proposal to be those as documented in the *Summary of the Preliminary Proposal For Tenure Review of Richmond Pastoral Lease under the Crown Pastoral Land Act 1998*. Dated 17 August 2005

### 3. Summary of the Branch Submission

The Branch fully supports the retention in Crown ownership, and protection of CA1, 2,3, and 4 and the conservation covenant over the pond provided there is an adequate buffer zone around it to protect its ecological integrity from adjacent influences.

The Branch does not support, but opposes the remainder of the preliminary proposal (PP) on the following grounds:

A substantial area proposed for freeholding includes significant areas of native vegetation such as large stands of snowgrass, extensive stands of short snow grass in a healthy condition with diverse shrublands, ephemeral tarns, wetlands and streams

The proposal does not include areas with significant vegetation, recreational and landscape values and may be contrary to the provisions of the existing Crown Pastoral Lands Act (CPLA). These areas, we maintain, should be retained under Crown control in the interest of the public, for the present and future generations.

And, the Branch understands that significant areas of natural values, including native vegetation and wetlands, as identified in the Botanical Assessment and Landscape Assessment, have been included in the areas to be freeholded. Such areas include healthy tussock grasslands and extensive shrublands and wetlands in the block proposed to be freeholded north of the Round Hill Ski Field Road, snowgrass grasslands and shrublands on the upper lateral moraines above the existing midslope fenceline at about 880m on the central block proposed to be freeholded, and the Washdyke Stream and its margins.

One of the best areas of fescue tussock is between Lake Tekapo, Coal River and the ski field road but this area has been proposed to be freeholded. This area is part of the landscape sequences from the lakeshore to the high mountain slopes, freeholding could compromise this vegetation cover and so downgrade the significance of the area as part of the overall landscape picture of the Lake Tekapo Catchment.

Richmond forms a significant part of the overall impressive landscape picture of the Lake Tekapo Catchment, especially as viewed from the township of Lake Tekapo itself. And these views are one of the main reasons for the high national and international appeal of the area - such as the broad landscape views of water and land that has not been intensively developed for farming, subdivided for lifestyle blocks and planted with dominant stands of forestry trees. The landscapes of Richmond and the surrounding Lake Tekapo Catchment are highly vulnerable to change as has been seen with the recent subdivision and house building consents granted for a property on the opposite side of Lake Tekapo. The Mackenzie District Plan *Lakeside Protection Area* only provides

limited control on development between Lilybank Road and the lake. Beyond this subdivision and land developments in the Lake Tekapo Catchment are largely uncontrolled by the District Plan. The area should be covered by an overall provision to protect and maintain its landscapes. While the present occupiers of the Pastoral Leasehold Land may well wish to continue farming and retain the present outstanding landscapes of which Richmond is a critical part. For future owners of the property it may well be different and subdivision and unsympathetic development may indeed occur. Between the existing Lilybank Road and the lake, existing farming development, OSTD and cultivation and grazing pressure has already destroyed or degraded the tussock cover which contributes significant inherent values (landscape and ecological) elsewhere on the lease. The Branch is most concerned that more intensive development after freeholding will compromise these values over a much wider area.

The intention to freehold an area significant for landscape and natural values, which includes the area north of the Roundhill Ski Field road, would put an intrusive wedge in what could be a corridor of land proposed for conservation and recreation along the top boundaries of the property and down to the lake edge. This wedge of proposed freeholded land could markedly compromise the landscape and natural integrity of the wider area of the Lake Tekapo Catchment.

And, the land between the lake edge and the Lilybank Road, is an important part of that landscape profile of the Lake Tekapo Catchment. The Branch feels that it is most important for it to be retained as Crown Land, not freeholded to preserve recreation and other options for the future.

Unmodified tussock grasslands are important for moisture retention and regulating runoff. And this aspect of regulated water yield is highly important in an area where water is critical for hydroelectric generation, farming and for maintaining habitats for native wildlife. Water also plays an important role in maintaining the attractiveness of the region for the many people who visit the Mackenzie Basin, both for tourist and local holiday visitors. So, retaining tussock grassland cover for water yield is a highly important aspect and their retention may have greater economic benefits than more intensive farming of the land. Protecting the land north of the Roundhill Ski Field road and extending CA3 downslope to protect all the land above the midslope fence south of the ski field road would help to do that.

Regarding access, while some provisions for public access is recognised, and there are legal roads, the Branch feels these are not adequate or secure, especially with the need for increased access from the Lilybank Road to the shoreline of Lake Tekapo. We believe, public access for recreation and enjoyment of the proposed conservation areas and beyond, have not been well provided for or indeed secure, both for present or future generations.

### **Decisions Requested**

The Branch requests that LINZ - the Crown Lands administrator, reject the current Preliminary Proposal and no area of Richmond be freeholded.

We request that the proposals be amended to:

a) restore to full Crown ownership and management, proposed conservation areas, CA1; CA2, CA3 and CA4.

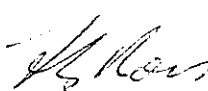
b) extend the proposed conservation areas to include the area north of the Roundhill Ski road, the area south of the ski field road between the midslope fence and the lower boundary of the CA3 area, and all of the length of the Washdyke Stream including a 100m buffer and either side of the stream from the top of the river terrace.

c) retain the remaining land as pastoral leasehold land in Crown ownership, ie the land between the Lilybank Road and Lake Tekapo, and the land south of the ski field road, between the Lilybank Road and the midslope fence at c880metres.

d) provide more adequate and secure access ways, in particular from the Lilybank Road to the edge of Lake Tekapo.

If the above cannot be achieved the Branch believes LINZ should not proceed with the proposal because of inadequate recognition and provision for the protection of inherent conservation and landscape values, and recreational access. And, because the preliminary proposal is not consistent with CPLA and the Government's objectives for the High Country.

Yours sincerely,

  
Fraser Ross,  
Branch Field Officer  
South Canterbury Branch  
Royal Forest and Bird Protection Society of NZ Inc.

29a Nile St,  
**Timaru**

Ph: 03 6843382.

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ROSA (QSA) Auditor  
IFMGA Mountain Guide  
NZOIA Assessor Rock, Alpine, Kayak  
SKOANZ Assessor

Ray Button  
30 Ocean Vie Terrace  
Sumner  
Christchurch 8008  
New Zealand  
Ph. Home 64 03 326 7882  
Cell. 027 242 7919  
Email: rbutton@xtra.co.nz

LINZ  
Torrens House  
195 Hereford Street  
Private Bag 4721  
Christchurch

**SUBJECT: Tenure Review of Mt. Gerald and Glenmore Stations,  
Lake Tekapo.**

**COMMENT:**

This whole area is of astonishing natural beauty and offers recreational opportunity for all levels of fitness and interests.

The historical difficulties of gaining access to the Godley Valley area due to land ownership issues (Indonesian owners), has been a clear example of the importance in maintaining public access rights.

I have grave concerns in changing these stations from leasehold to freehold. Even though public access may still be established, the potential for sub-division development beyond the existing town site would in my view destroy the uniqueness of this:

*"jewel of the Mackenzie Basin".*

Yours Sincerely

Ray Button

CC: Local MP Ruth Dyson  
Prime Minister Helen Clark  
Minister for Environment D. Benson-Pope



18

Anne Steven  
Registered Landscape Architect ANZILA  
80 Ardmore St  
P O Box 576  
WANAKA

RECEIVED  
19 OCT 2005  
Quotable Value, N.Z.

15 October

Barry Dench  
QV Valuations  
P O Box 13 443  
CHRISTCHURCH

Dear Barry

**RE: PRELIMINARY PROPOSAL FOR REVIEW OF TENURE, RICHMOND PASTORAL LEASE**

I have reviewed the preliminary proposal for Richmond Pastoral Lease and the following is my submission on this proposal.

I am a registered landscape architect with considerable experience in landscape description and assessment. I undertook landscape assessments for the Department of Conservation (Canterbury) in for the tenure review programme over the period 1995-2002. Over that time I assessed over 40 different pastoral lease properties.

I was raised in the Mackenzie Basin and am familiar with its special landscape character.

**MY SUBMISSION**

**SUMMARY**

1. CA4 and CA2 do not achieve the recommended ecological corridor and altitudinal sequence on a landscape scale. The middle area is missing. The land north of the ski field road, which retains the best short tussock and shrubland areas on the property, should be largely included in the proposed conservation area. This would make one large conservation area, CA2 which would achieve a proper landscape corridor from lake shore to range top.
2. The proposal makes very poor provision for public access to and enjoyment of the lake side areas with only one vehicle access point outside of CA2 and public use limited to a uniform 20m strip along the waters edge and a very small area of gravel cliffs at the south end. The proposal fails to recognise the strategic importance of lake side areas at this stage in time, with a strong process of landscape change due to unrestrained subdivision and built development in the district. It also fails to recognise the paucity of accessible places to go to enjoy the district's lake shore areas, as much of the lake edges are rimmed by private land.
3. The covenant area around the wetland needs to be large enough to ensure an appropriate physical and visual setting in the long term.
4. The southern kettleholes in their hummocky topographical context under short tussock grassland require protection.

5. There should be a covenant or management agreement over the more natural parts of the remaining freehold land to guide its future use. The objects of this would be to retain the areas as extensively grazed grassland of a balance of native and exotic species through careful stock and land improvement management with monitoring.
6. Access a-b should be located to utilise the existing 4WD track, providing a loop walk up to CA3 via the track and Washdyke creek.

## EXPLANATION

### Proposed CA4 and CA2

The proposal to retain these areas as natural landscape for conservation purposes is fully supported. The Richmond range has very high inherent landscape value as well as being highly visible and a significant backdrop to views from SH8 and the Tekapo village area, and part of the immediate setting for the ski field. The Coal River valley fan is a large dramatic and uncommon natural feature supporting specialist indigenous species; the valley part is also a large and dramatic feature, containing a variety of native shrub species.

Together these proposed conservation areas start to build a corridor and altitudinal sequence of protected natural landscape from lake shore to range top, as recommended in the Protected Natural Areas report for the Mackenzie Basin (RAP 30). The achievement of such a corridor of landscape would be an excellent outcome – to date no such complete sequence has been achieved in the Mackenzie Basin, as typically lower altitude land is 'won' by the lessee for private freehold use and development or is too modified to be good enough to include. Richmond presents a rare opportunity to achieve this.

In the preliminary proposal however, this opportunity is being missed. A serious effort should be made to achieve the corridor envisioned.

Only a thin ribbon of land no more than 300-400m wide connects the lake shore area and the CA4 area. Basically the two areas are separated by a large chunk of rolling mid altitude land (700-1000m altitude approximately) that under freehold could substantially lose its remaining natural values. The high potential for the area north of the ski field road to return to a more natural state is being overlooked.

This area currently retains a relatively greater sense of natural character, remoteness and integrity which is deserving of protection under conservation oriented management. The proposal divides up this area in an odd way which will not maintain the integrity of the landscape. Under freehold ownership, more intensive pastoral use is like and forestry and life style block development is a possibility. This would result in an unnatural landscape pattern and division.

Coal River valley and its major side streams should be included as a whole. The proposed boundaries miss out large parts of the valley and only offer partial protection to the river valley entity.

The background reports record important natural values to the north of the ski field road, namely the best area of fescue tussock, in good condition and with a reasonable diversity of native species; and the most extensive shrublands exist on the true right of the Coal River between 800 and 1100m

altitude<sup>1</sup>. Ephemeral tarns and wetlands are also present over this area<sup>2</sup>. The area could return to a much healthier indigenous state if freed from interference from grazing, AOSTD, etc.

This mid altitude glacially-moulded landscape is noted in the landscape report as being important for the sense of expansive scale and spaciousness, its visual simplicity and natural character which is special to the character of the Mackenzie Basin high country. This is particularly so in this area where the ranges rear up from a low angle foreground.

A larger area should comprise CA2 and CA4, they could be combined into one large conservation area, CA2.

This area should include all the land between the ski field road and Lilybank Road, all of the Coal River valley landform, and most of the land to the north of Coal River. The two large side valleys and the land in between should be included in a conservation area. The existing fence could – in this case – be used in part as the new boundary. The boundary should run south from Mt Gerald for about 1km then due west down the true right of the large side valley then back down the true right of Coal River valley to the road.

### CA3

The lower boundary for this area follows an appropriate line generally. It should continue along the 1100m contour however rather than rising in altitude towards Coal River. This is so the whole of the relict terrace landform including its western risers is included in CA3. The presence of an existing fence line is not a valid reason for persisting with a line where a better line is present – this opportunity to ensure good landscape outcomes through sensitive siting of boundaries happens only once. This would also provide a physical link outside of the ski field reserve area to CA2.

### Lake side Areas

This proposal does not provide for any lakeside recreation areas except for CA1 and only one or two vehicle access ways to the lake over around 15km of shoreline. This is a serious omission, in a district where there is little in the way of pleasant, readily accessible and usable areas for lakeside recreation.

The main value of CA1 is its landform and vegetation/wildlife habitat, it is very small, and it is not amenable to picnicking, walking etc as it comprises gravel cliffs and stony gullies with scrub.

CA2 is at the head of the lake and will not offer the same lake experience as sections 'down-lake'. The 20m marginal strip is insufficient for proper recreation and enjoyment of the lake side landscape. Physical access along it is likely to be difficult at times. Easier physical access and more appealing and spacious surrounds are likely to be gained by including land further back from the immediate water's edge. Provision of a narrow 20m strip is also physically restrictive where there are cliffs and fluctuating water levels and it can be psychologically uncomfortable from a 'right to be there' point of view.

Additionally, free holding of areas so close to the lake makes them vulnerable to visual degradation through domestic development for lifestyle blocks and holiday homes, which essentially privatises the lacustrine zone. This kind of development is forging ahead in the Mackenzie District (eg around Twizel) and left unchecked it is very likely to spread around the lakes because of their moderated micro-climates, easy topography and access, and superb views. Building is discretionary in this district around lake shores, which means that consent can be applied for and granted, at the discretion of Council.

Equally, more intensive farming including public-unfriendly deer farming, and tree planting is

1 p. 9 Conservation Resources Report 19/08/05

2 Anon. (undated) Botanical Assessment of Richmond Pastoral Lease for DOC at p.4

likely.

In this district, development of this nature is likely to be regarded as positive for its short term economic benefits. The longer term loss of landscape values and public access is likely to be the sacrifice paid for such gain. This is something that many people are concerned about now and that I believe the local resident community will soon come to seriously regret. The district council has only recently started seriously considering how recent development is impacting - or will impact - on the outstanding landscapes of the Mackenzie Basin. It will be some time yet before resolutions are made on the issues at hand, and an even longer time before any changes to the district plan are made and implemented, if it is decided greater protection is needed and this is by no means certain at this stage. In the meantime much irreversible damaging development could occur as of right. Tenure review offers an opportunity now to secure the protection of important and valued lake side lands in perpetuity as well as securing public access to and enjoyment of the high country in such areas. This is one of the purposes of the Crown Pastoral Land Act 1998 in Part II.

A larger and more continuous area should be set aside as reserve around the lake shore with vehicle access at more than one point, to provide for picnicking, fishing, painting and other more passive vehicle based activities. Some areas between the road and the lake should be set aside for public use to enable proper enjoyment without the sense of being squeezed into the legal minimum (the 20m strip) and one small area (because it is useless for farming or development) in a 15km stretch of shoreline.

### **Conservation Covenant**

The proposed covenant area should include an appropriate visual and physical context for the wetland itself. The outcome should not be just a fence around the wetland especially if it is right beside the road. The exclusion of fertiliser application and tree planting in the vicinity of the wetland needs to be ensured as well to avoid pollution, over-shading, drying up of the wetland and trees physically falling into it.

### **Southern Kettleholes**

The landscape report describes kettle tarns both permanent and ephemeral in typical well-developed hummocky depositional glacial topography at the south end of the property<sup>3</sup>. The proposal does not mention these or offer any kind of protection or public access to enjoy these features. These should be fenced off and included as part of a potential Boundary Stream conservation area (proposed in the Mt Hay conservation resources report).

### **Remaining Freehold Land**

I am concerned that there is no covenant over most of the remaining freehold landscape, which also shares the expansive more natural high country character of the area north of Coal Creek. This area still has visual values even if modified and still contains native species on natural landforms. It is part of the backdrop landscape seen from Tekapo and SH8.

Covenant objectives should be to retain this area as extensively grazed grassland of a balance of native and exotic species through careful stock and land improvement management. This would need monitoring so that if the native component showed decline, management could be amended.

### **Access a-b**

A better public access route would be to utilise the existing 4WD track which approximates the

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3 p. 7 Richmond Landscape Report para. 10.1


legal road. This would allow parking at Washdyke Creek on the road, and a loop walk up to CA3 via the track and Washdyke creek.

## CONCLUSION

I welcome this opportunity to review and be able to respond to the preliminary proposal for the tenure review of Richmond Pastoral Lease. This part of the process is an important one, for it ensures the proposal best meets the objects of the Crown Pastoral Land Act by permitting robust review of the proposal by various stakeholders before final decisions are made.

If the preliminary proposal is modified to address the points raised in my submission then the outcome of tenure review for Richmond will be an exemplary one. It will give proper effect to the objects of the CPLA and properly recognise the value of public submissions.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Anne Steven", followed by a horizontal line extending to the right.

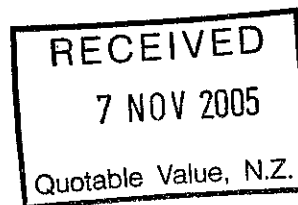
Anne Steven

17/10/05

Leq 21862

19

Stu Allan  
73a Hackthorne Rd  
Christchurch 2  
[stu@activevoice.co.nz](mailto:stu@activevoice.co.nz)



LINZ  
Torrens House  
195 Hereford Street  
Private Bag 4721  
Christchurch

**Tenure review of Mt Gerald and Glenmore Stations  
Lake Tekapo.**

Dear Sir / Madam

This is an area of unique recreational value to New Zealand and the world.

The historical access difficulties to the Godley Valley area due to land ownership issues has been a clear example of the importance in maintaining public access rights to the high country.

I am concerned that in changing these stations from leasehold to freehold, that:

- Public access to the high country is established.
- The potential for sub-division development beyond the existing town site is carefully controlled.

The land tenure review process has huge positive potential for recreation and tourism. It also has the potential to irreversibly destroy the nature of the New Zealand outdoors if it is not done with wisdom and foresight.

Yours

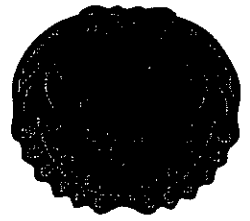
Stu Allan

North Canterbury Branch  
Royal Forest and Bird Society  
PO Box 2389  
Christchurch  
22/10/05

Department of Land Information NZ  
Po Box 4721  
Christchurch



Log 21925



FOREST  
& BIRD

Royal Forest and Bird  
Protection Society  
of New Zealand Inc

Dear Sir/ Madam

RE : RICHMOND STATION PROPOSAL FOR TENURE REVIEW

Whilst I acknowledge the date for submission on this proposal has closed , I believe this proposal highlights a major problem with tenure review.

Whilst the higher lands are magnificent to look at its the lower lands that hold the lifeline for most of our flora and fauna including ourselves. The proposal that 3585 hectares of the steep upper slopes and screes ( granted there is allowance for a small area of river outwash also ) be given to conservation whilst 6000 ha of lower lands with extensive tussock , native shrub islands and wetlands is freeholded .

Surely this . is not the object of tenure review , to give away from present public ownership such vast amounts of lowlands risking degradation and development ? Is it not possible to conserve larger areas that stretch from sky to lake... in this case Lake Tekapo ?

Yours Sincerely

Maria Stoker-Farrell  
Secretary  
North Canterbury Branch  
Royal Forest and Bird Society

Please excuse the start on this letter - the thicker headed paper is jamming in the printer



21



27 October 2005

QV Valuations  
P O Box 13443  
Christchurch

Attn: Barry Dench

**RICHMOND TENURE REVIEW**

Dear Barry, as discussed by way of phone call today, Fish and Game would like to make a submission in relation to our previous report provided 12 September 2001 and in relation to the recently notified preliminary proposal for the Richmond Tenure Review. I acknowledge that this is a late submission and appreciate the opportunity for it to be accepted as such.

Fish and Game provided an assessment of Fish and Game interests in relation to the property and on inspection of the preliminary proposal consider some of these interests to be unsatisfactorily protected.

We provide the following comments in relation to the preliminary proposal;

- Fish and Game have concerns that the potential land management practices on any freehold land may have result in reduced water quality and subsequently affect Fish and Game values.
- Intensification of land use around the edge of Lake Tekapo may lead to increased nutrient loading to the lake and the rest of the catchment.
- We support the designations that protect Coal Creek, which provides trout spawning and juvenile rearing habitat, along with limited angler use.
- We consider the contribution of Washdyke Stream to the lake as important and request CA3 be extended to include the stream and riparian margins.
- We submit that CA1 could be extended north to link with Washdyke Stream and south to the boundary of the lease to provide access to this area of lakeshore.
- There are other smaller waterways on the property that are of a size to warrant marginal strips, that are not identified on the plans. We consider the protection of these streams to be important, especially in relation to stock access restrictions and riparian management.
- Land along the shore of Lake Tekapo should be subject to protective mechanisms if freeholded to ensure protection of water quality in the lake.

*Statutory managers of freshwater sports fish, game birds and their habitats*

**Central South Island Region**

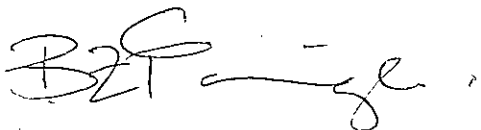
32 Richard Pearse Drive, PO Box 150, Temuka, New Zealand. Telephone (03) 615 8400 Facsimile (03) 615 8401



- Part 2.5.3 refers to the unformed legal road along the lake to be in lieu of a marginal strip. This does not secure practical access for Fish and Game licence holders or the public in general for the future. Also the land that may be freeholded between the lake and the road may serve to prevent access in the future. We consider a formal strip of land along the lake from the highest water mark should be set aside and restored to the Crown.

I have attached the original Fish and Game resources report for the Richmond property for your information and appreciate the opportunity to offer this submission on behalf of Fish and Game licence holders.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'B Z Pringle', with a stylized flourish at the end.

B Z Pringle  
Resource Officer

12 September 2001

QV Valuations  
PO Box 13 443  
CHRISTCHURCH

Attention: Barry Dench

Dear Barry,

**TENURE REVIEW – RICHMOND**

The following provides an assessment of Fish and Games interest in relation to the Richmond property.

1. Lake Tekapo provides a self sustaining sports fishery of both brown and rainbow trout. The 1994-96 National Angling Survey estimated that in excess of 3000 angler days are spent fishing Lake Tekapo each season.
2. Coal Creek is a tributary of Lake Tekapo which provides trout spawning and juvenile rearing habitat, along with a limited angling value.
3. The strip of land between Lake Tekapo and Lilybank Road in the Northwest corner of the property provides Canada geese habitat and hunting opportunity.
4. Fish and Game is interested in access for upland gamebird hunting on Richmond. Chukor and Californian Quail are present on this property. Chukor has the more notable presence being there in greater numbers.
5. Chukor were first introduced to New Zealand in the mid 1920's. They were released from Marlborough to Central Otago. In the Central South Island chukor flourished from the 1940's through to the early 1960's with numerous birds present on most high country stations.
6. From the 1960's onwards chukor numbers decreased considerably. This decline has been attributed to being a non-target kill species of rabbit poisoning operations. Today in the Central South Island there is a limited distribution of chukor.

7. In the 1940's to 1960's with high numbers of birds available and access to the favoured habitat readily available chukor hunting was popular. With chukor now less numerous and access harder to attain (not necessarily the case on this property) hunter interest has fallen. However, there are individuals and groups of hunters who hunt chukor and quail extensively and often exclusively. This hunting is largely confined to the high country of the Omarama and McKenzie areas.
8. The favoured habitat of chukor is high up on the dry, sunny faces amongst rocky outcrops. The birds are highly mobile and numbers have begun to again increase as the rabbit poisoning operations have reduced since the release of the rabbit RCD virus.
9. With numbers of chukor again increasing the future is looking promising for this highly valued upland gamebird. Hunter interest has already begun to increase and access to traditional hunting areas is very important.
10. Fish and Game requests that the following be negotiated and included in the tenure review:
  - a) Marginal strips along the Tekapo Lake front and Coal Stream where they bound the property.
  - b) Access to the Canada geese hunting area (see attached map) for hunters during the gamebird season.
  - c) Access to the Chukor and Quail hunting areas (see attached map) for hunters during the gamebird season.
  - d) Retention of all legal roads to facilitate access to the gamebird and sportsfish resources.

Yours faithfully

Vaughan Lynn  
Fish and Game Officer



File Ref: CON/50000/16/12705/00/A-ZNO

Quotable Value Limited  
www.quotable.co.nz

31 October 2005

Mr Ray Button  
30 Ocean View Terrace  
Sumner  
CHRISTCHURCH

Dear Sir

**RE: TENURE REVIEW OF RICHMOND PASTORAL LEASE**

I am writing to thank you and acknowledge receipt of your submission on the Preliminary Proposal for Richmond Tenure Review sent to Land Information New Zealand on 14 October and passed on to Q V Valuations on 31 October 2005.

Q V Valuations is one of three service providers carrying out tenure review services for LINZ, including receipt of public submissions to Preliminary Proposals.

Information regarding public submissions will be posted on the Land Information New Zealand website at a later date. Should you wish to be notified via email or post when this occurs you can forward your request to the address below.

Yours faithfully  
**QV VALUATIONS**

A handwritten signature in black ink, appearing to read 'Barry Dench', written in a cursive style.

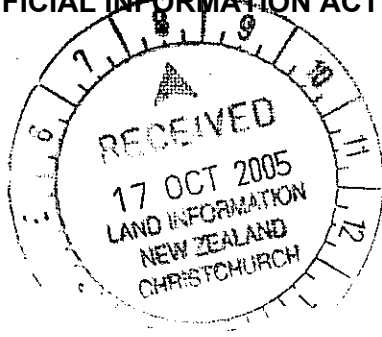
Barry Dench  
TEAM LEADER FOR TENURE REVIEW

QV Valuations  
Christchurch Office  
62 Riccarton Road, PO Box 13443  
Christchurch  
Ph(03)341 1631 Fax(03)341 1635

*Contractor to Land Information New Zealand for Tenure Review Services*

Log 21844

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ROSA (QSA) Auditor  
IFMGA Mountain Guide  
NZOIA Assessor Rock, Alpine, Kayak  
SKOANZ Assessor

Ray Button  
30 Ocean Vie Terrace  
Sumner  
Christchurch 8008  
New Zealand  
Ph. Home 64 03 326 7882  
Cell. 027 242 7919  
Email: rbutton@xtra.co.nz

LINZ  
Torrens House  
195 Hereford Street  
Private Bag 4721  
Christchurch

**SUBJECT: Tenure Review of Mt. Gerald and Glenmore Stations,  
Lake Tekapo.**

**COMMENT:**

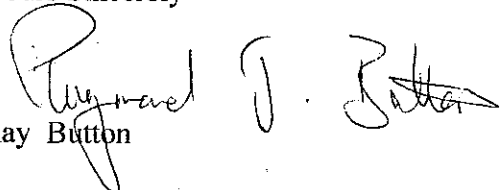
This whole area is of astonishing natural beauty and offers recreational opportunity for all levels of fitness and interests.

The historical difficulties of gaining access to the Godley Valley area due to land ownership issues (Indonesian owners), has been a clear example of the importance in maintaining public access rights.

I have grave concerns in changing these stations from leasehold to freehold. Even though public access may still be established, the potential for sub-division development beyond the existing town site would in my view destroy the uniqueness of this:

*"jewel of the Mackenzie Basin".*

Yours Sincerely

  
Ray Button

CC: Local MP Ruth Dyson  
Prime Minister Helen Clark  
Minister for Environment D. Benson-Pope