



20 May 2015.

Commissioner of Crown Lands
Land Information New Zealand
Christchurch.

Dear Mr Cullen,

Re: Tenure review of The Grampians Crown pastoral lease

Federated Mountain Clubs (FMC) was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of 18,000 members. This core function gives FMC a strong interest in Crown pastoral tenure review as, through the process, land can be redesignated for new purposes including conservation and recreation.

Of particular significance to FMC due to its interest in biological, landscape, and historic values and recreation access are the prioritised objects of the statute enabling tenure review, Part 2 of the Crown Pastoral Land Act 1998:

Section 24

(a) to-

(i) promote the management of reviewable land in a way that is ecologically sustainable

(b) to enable the protection of the significant inherent values of reviewable land-

(i) by the creation of protective mechanisms; or (preferably)

(ii) by the restoration of the land concerned to full Crown ownership and control,

and the following object:

*(c) subject to paragraphs (a) and (b), to make easier-
(i) the securing of public access to and enjoyment of reviewable land.*

Additional objects, to enable reviewable land capable of economic use to be freed from the management constraints (direct and indirect) resulting from its tenure under reviewable instrument, and the freehold disposal of reviewable land, must also be considered, though their priority is not as high as those of (a)(i), (b)(i), and (b)(ii).

The Grampians

This 16,057ha property, covering around 1,400m of altitudinal range, encompasses a range of farming and natural features and includes hydro-electric transmission infrastructure. Many natural components are modified or degraded, but a great deal are intact. Redesignation, particularly for the prioritised purposes of ecologically sustainable land management and protection of significant inherent values, need not be fully linked with degrees of alteration or intactness, though these factors influence FMC's response to LINZ' proposals for designation changes.

The following submission views The Grampians' preliminary proposal through the lens of the objects of Part 2 of the Crown Pastoral Land Act 1998 and their heirarchy.

Proposed CA1

High significance of some plant and fauna species, the national importance of the waterway system, the chronic threat to the land environment, and the natural uncommonness of the wetland community in this proposed area make its full protection appropriate.

Extending protection westwards would support species', natural communities', and the land environment's persistence and provide additional natural buffering and should be considered a means to meeting the requirements of the statute.

Proposed public access is practical and welcoming to recreationists. The conservation and farm management easement proposals are helpful.

Recommendation:

*** *that proposed designation CA1 be adopted.***

*** Note: addition to CA1 discussed further on pages 7 and 8.**

Proposed CA2

This proposed area includes significant inherent values such as a nationally critical buttercup and habitat for nationally vulnerable birds and nationally endangered invertebrates. It is a naturally uncommon habitat. Protection is the fitting outcome for this land parcel.

Integration of conservation management with proposed area CA4 through extension of either area to meet the other would improve the fortunes of the species and natural communities in both areas by expanding corridor and buffering opportunities which may otherwise be lost.

Proposed public access and the proposed farm management easement concession are practicable and enabling.

Recommendation:

*** *that proposed designation CA2 be adopted.***

*** Note: connection with proposed CA4 discussed further on page 7.**

Proposed CA3

Restoration to full public ownership of this 5ha area is important as the naturally uncommon habitat, including significant botanical values, fosters a nationally endangered invertebrate species and the land environments are classified as 'critically underprotected' and 'at risk.'

For the enduring diversity and health of this area and its species and sub-communities, greater and growing linkage with the surrounding surfaces is desirable and will best be achieved by rehabilitation and enduring protection of those surfaces.

Public and conservation management access proposed is pragmatic.

Recommendation:

*** *that proposed designation CA3 be adopted.***

*** Note: addition to CA3 discussed further on page 7.**

Proposed CA4

There is much significance and high significance in the values of the waterways, surrounding land, and species and communities of this proposed area. Originally rare inland outwash gravels and a land environment threat classification of 'chronic threat' make the land itself significant. There is botanical, bird, and invertebrate high significance.

Restoration and maintenance of high diversity and health and the ongoing viability of this area, particularly for invertebrates, fish, and other fauna, will be enhanced by its extension to CA2 to the southeast, and a general expansion of its boundary to the legal road running from Haldon Road to

approximately 500m west of CA2, and the legal road running from that point back to Haldon Road further north.

Proposed access for the public, conservation management, farm access, and for water management is practical. Recreationists will find themselves welcomed.

Recommendation:

*** that proposed designation CA4 be adopted.**

*** Note: addition to CA4 discussed further on page 7.**

Proposed CA5

Botanical, invertebrate, and fauna significance, including chronically threatened plants and a nationally endangered invertebrate, exist in this proposed area. Landscape values are of medium to high significance. All these values exist, additionally, in the land to the north of this proposed area, to the property's Mackenzie Pass Road boundary.

Protection of significant inherent values and potential for ecologically sustainable management will be enhanced by extending the guardianship of full public ownership and management for conservation purposes north to the property's boundary, as described in the paragraph above.

Proposed recreation access, while pragmatic and helpful as it stands, will be significantly enhanced by the expansion of proposed CA5 also. Conservation management access proposed is practical.

Recommendation:

*** that proposed designation CA5 be adopted.**

*** Note: addition to CA5 discussed further on page 6.**

Proposed CA6

The landscape of proposed CA6 is largely significant or highly significant, and considered 'iconic' Mackenzie country. Significant invertebrate, botanical and other fauna species and their habitats exist in the area, in a large range of communities. Threat categories 'nationally vulnerable', 'chronically threatened', 'nationally endangered', and 'nationally critical' apply to several species.

A large proposed area at 3,453ha, it presents good opportunities for conservation and recreation, but with values' significance extending beyond its boundary, the statute's purposes will be best served by increasing the area proposed. To do this meaningfully, and safeguard significant aquatic values, including those in the Snow River, the northern CA6 border should be extended further north to include Monkey Rock and finish close to CA2 in the east. In the east, it should be pushed to the property's boundary where new fencing line V-W is indicated, allowing protection of

significant inherent landscape values and the area's 'chronically threatened' and 'critically underprotected' land environments.

Eastward extension of the proposed CA6 boundary will also protect the Dalgety Stream brook char habitat.

Public, conservation management, and farm access and movement access proposals are well-considered and practical.

Recommendation:

* ***that proposed designation CA6 be adopted.***

* **Note:** addition to CA6 discussed further on page 8.

Proposed covenant CC1

FMC is partially supportive of proposed CC1a and CC1b as appropriate designations for protection of significant botanical communities, though greater detail about potential topdressing would be helpful. Addressing historic nutrient deficits is apposite, but continued addition of nutrients could impact negatively on the botanical values the covenant is proposed to protect; this should not be allowed to occur. Oversowing should not be permitted as it is highly likely to be abrasive to botanical values and values dependent on botanical health. Limitations on activity in proposed CC1 will also help maintain its 'iconic' Mackenzie landscape value.

Monitoring of CC1b should be regular and include observation of the effects of topdressing, and results should be made freely available to inform the work of parties interested in hill country and high country regeneration.

Proposed conservation management access is appropriate and practical.

Recommendation:

* ***that proposed CC1a and CC1b be adopted. Topdressing planning should explicitly aim to avoid negative effects on botanical values.***

* ***that oversowing not be permitted.***

* ***that covenant monitoring include observation of effects of topdressing.***

* ***that monitoring results be made freely available to interested parties.***

Proposed covenant CC2

This proposed covenant relates to an area containing botanical significance and significance for invertebrate and fauna values. Landscape values, whose protection is central to the covenant, are highly significant. Protection for the combined values of this area should be more robust than that

provided by a covenant. Topdressing and oversowing are inappropriate activities for land with values of these degrees of significance.

A fitting outcome for this parcel of land is inclusion in proposed CA5, to enable ecologically sustainable management and protection of significant inherent values.

Recommendation:

**** that proposed designation CC2 be included in an expanded CA5.***

Proposed CC3

The appropriate observation, management, and protection of a nationally critical plant species are central to this covenant.

Monitoring results should be made freely available to inform parties interested in the management of this site.

Recommendation:

**** that proposed designation CC2 be adopted.***

**** that monitoring results be made freely available to interested parties.***

Proposed covenant CC4

Significant invertebrate, botanical, and fauna values exist in this area, which is in a 'chronically threatened' land environment. The protection offered by the proposed mechanism is fitting.

Recommendation:

**** that proposed designation CC4 be adopted.***

Sustainable management covenant SMC

Executed with multidisciplinary skill, the proposed SMC could result in ecologically sustainable management, or even improvement in the fortunes of values present. The management regime proposed presents as good husbandry.

It is important that the proposed covenant management regime properly recognise the significance of threats to the land environments present (almost exclusively 'acutely threatened', chronically threatened', and 'critically underprotected'), and that appropriate management perpetuate regardless of the property's ownership.

Monitoring results may be of note to parties interested in hill country and high country farming and regeneration and should be made freely available.

Westward expansion of proposed CA3 into the proposed SMC will protect and enhance significant invertebrate and botanical values by adding buffering and coverage and population opportunities for species and communities. Technical advice should be sought on the expansion's extent.

Replacing part of the proposed SMC with an extension to CA4 to foster linkage with CA2 for enhanced protection of aquatic, invertebrate, and botanical values would improve the way the proposal serves the statute's purposes. Expanding proposed CA4 to run between the legal roads as recommended in the **Proposed CA2** and **Proposed CA4** sections above would protect significant fish, fauna, and invertebrate values and enhance natural communities' health. Public and conservation management access adjustments would be needed.

Extension of the proposed sustainable management regime to parts of the proposed freehold area is appropriate where there are high land environment threat levels.

Recommendation:

**** that proposed designation SMC be adopted, and that management adequately respond to threats to land environments.***

**** that monitoring results be made available to interested parties.***

**** that proposed CA3 be expanded westward to include part of proposed SMC as technical advice indicates.***

**** that part of proposed SMC be designated conservation area to extend CA4 toward CA2.***

**** that the proposed CA4 boundary be extended to the legal road running from Haldon Road to approximately 500m west of proposed CA2, and the legal road running from that point back to Haldon Road further north.***

**** that where changes are made to the boundary of CA4, appropriate adjustments be made to public and conservation management access.***

**** Note: addition to SMC discussed on page 8.***

Proposed freehold without protective mechanisms

Aquatic, fauna, and invertebrate values of note in the proposed freehold west of proposed CA1 will be best protected by that land's addition to Proposed CA1.

Northward extension of proposed CA6 for the protection of significant botanical, invertebrate, fauna, and landscape values will place the border of this area on a line running approximately from the western point of proposed CA6 in a northeasterly direction to include Monkey Rock and finish close to CA2 in the east.

Where new fencing line V-W is indicated, the statute will also be well served, due to significant inherent landscape values and the area's 'chronically threatened' and 'critically underprotected'

land environments, by inclusion of proposed freehold land as far as the eastern boundary, in proposed CA6.

The above proposed change to the proposed freehold will additionally protect the Dalgety Stream brook char fishery.

The Grays River is known as a brown trout fishery; provision should be made for angler access and maintenance of water quality where the river forms part of the proposed freehold property boundary.

Where threats to the proposed freehold's land environments are significant, the SMC's protection should be applied to satisfy the statute's requirements.

Recommendation:

- * *that proposed freehold west of proposed CA1 become part of proposed CA1.*
- * *that CA6 be extended into proposed freehold land to run from the western point of CA6 northeast to include Monkey Rock and finish close to CA2 in the east.*
- * *that proposed CA6 be extended east through proposed freehold land to the property's boundary.*
- * *that provision be made for angler access and maintenance of water quality where the Grays River forms part of the proposed freehold boundary.*
- * *that significantly threatened land environments within the proposed freehold area not otherwise addressed here be included in the SMC .*

Legal Roads

All legal roads should remain open to protect present and future recreation access and connectivity, and conservation and farm management access.

Land classification

Technical advice supporting this review of Crown pastoral tenure should be used to inform appropriate, specific classification of the public conservation land resulting from the process, to enable proper management as quickly as possible. FMC is of the view that if the information is sufficiently complete and up-to-date to underpin a robust tenure review then it should also be sufficient as a basis for precise classification decisions.

Conclusion

In general, this submission recommends more and better protection than that suggested by The Grampians' preliminary proposal. As it presently stands, FMC believes the proposal doesn't

adequately meet the statute's primary demands of promoting ecologically sustainable management and enabling protection of significant inherent values.

FMC acknowledges the proposal's ready facilitation of conservation management and recreation by provision of numerous practical access ways, but satisfaction of the guiding statute's first order objects' demands should mean more, and more active and enduring, ecologically sustainable management and protection for significant inherent values, as recommended here.

The Crown Pastoral Land Act 1998's first priorities will be further served by using the tenure review's supporting technical data to expedite specific classification - therefore, enabling ecologically sustainable management and protection of significant inherent values to begin promptly - of public conservation land.

Yours sincerely,

J. R. Finlayson
for FMC executive.

Contact: Jamie Stewart
Administrator, Federated Mountain Clubs
PO Box 1604
Wellington 6104.
04 9346089
secretary@fmc.org.nz