



17 March 2016.

Commissioner of Crown Lands
Land Information New Zealand
Christchurch.

Dear Mr Gullen,

Re: Tenure review of Island Hills Crown pastoral lease

Federated Mountain Clubs (FMC) was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of 20,000 members. This core function gives FMC a strong interest in Crown pastoral tenure review because the process allows land to be redesignated for new purposes including conservation and recreation.

Particularly significant to FMC because of the organisation's interest in natural 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).

Island Hills

On the eastern border of Lake Sumner Forest Park in North Canterbury, this property covers approximately 5,083ha, rising from 500m to 1,704m on the Organ Range's Mt Skedaddle. It is bounded by the Mandamus River, which drains to the Hurunui, and Gorge Stream, in the Waiau catchment.

Natural values are largely intact from beech forest in the property's lower parts to the plant communities of its upper, geologically-diverse mountainous areas. Only lightly developed as a farm, Island Hills has minimal access, though the leaseholder-operated Hurunui High Country Track (HHCT) - presently closed - runs 30km in a north-south direction on the eastern edge of the property.

This submission views the Island Hills preliminary proposal through the frame of the objects of Part 2 of the Crown Pastoral Land Act 1998 and their hierarchy.

Proposed CA

High landscape, botanical, invertebrate, and other faunal values, as well as adjacency to Lake Sumner Forest Park, make full Crown ownership and control appropriate for this proposed 1,642ha land parcel.

It has a high degree of natural landscape character and significant visual and scenic values. The tops are distinctive and very visible in inland North Canterbury. Continuous altitudinal habitat sequences include some old growth beech forest and At Risk plant species such as *Coprosma acerosa* and *Senecio dunedinensis*. The unbroken altitudinal sequences are of significance for invertebrate faunal values also.

The scree weta and the indicator species mountain stone weta are among the numerous weta species existing there; another invertebrate species of conservation interest inhabiting proposed CA is *Brachaspis nivalis*, closely related to the Nationally Endangered *Brachaspis robustus*.

The Nationally Vulnerable eastern falcon, the Naturally Uncommon kea, and the Declining New Zealand pipit are among bird species existing in proposed CA; it is feeding and breeding habitat for at least seven non-threatened bird species and at least two non-threatened lizard species. It is possible that the Nationally Critical long-tailed bat, known in the adjacent Lake Sumner Forest Park, is present also.

The forest park's adjacency and the presence of its Jollie Brook Circuit facilities make proposed CA accessible. A marginal strip allowing access up Gorge Stream from the Waiau River exists also. Spider Web and Mt Skedaddle, on the eastern margin of the proposed block, are examples of appealing recreational objectives.

Recommendation:

*** that proposed designation CA be adopted.**

Proposed freehold with continued QEII covenant

Approximately 600ha are contained in this proposed designation which contains many significant natural values and strong public recreation values.

There is a high degree of natural landscape character and high overall visual and scenic values, the remnant beech forest is highly representative of original vegetation, and Blue Lagoon is a significant landscape component. In conjunction with the rest of the property, this block represents an important intact example of a Canterbury high country landscape.

Significant plant species such as the At Risk *Rytidosperma merum* and *Stenostachys gracilis* exist in this proposed block, which includes Chronically Threatened and Critically Underprotected Land Environments of New Zealand. The beech forest, highly representative of original vegetation, has very high significance. Continuous altitudinal sequencing is botanically significant.

The area provides habitat for the Nationally Vulnerable eastern falcon, the Naturally Uncommon kea and black shag, and the Declining New Zealand pipit and South Island rifleman, and it is feeding and breeding habitat for at least seven non-threatened bird species and at least two non-threatened lizard species.

Recreation values are considerable. High natural significance coupled with adjacency with proposed CA - in turn, adjacent to Lake Sumner Forest Park - make the proposed block attractive to and accessible for recreationists from the Jollie Brook area. Additionally, a legal road gives access to the block's southern margin.

The HHCT, running through the lower part of the proposed block and including Bush Hut, has been a well-regarded facility, though its future is presently unclear. It has potential to continue functioning as a private concern or as a public asset.

The designation proposed is insufficient to provide the perpetual protection needed for the highly significant natural values of this block. Full Crown ownership and control is a more appropriate - as stated in the Act, 'preferred' - way of achieving that protection.

Recommendations:

- * ***that proposed freehold with continued QEII covenant and the significant inherent values it contains be given the protection of the Act's 'preferred' full Crown ownership and control because of the values' documented very high quality.***
- * ***that if proposed freehold with continued QEII covenant becomes public conservation land, a concession to operate the HHCT, including exclusive use of Bush Hut, be offered the present leaseholders.***
- * ***that if proposed freehold with continued QEII covenant becomes public conservation land, and the present leaseholders choose not to operate the HHCT as a concession, the Department of Conservation manage components of it falling within the proposed block as public recreation assets.***

Proposed freehold with CC2

Around 1,866ha fall under this proposal for freehold title with a Reserves Act 1977 covenant. It includes northern and eastern parts of the Organ Range and Organ Stream, and drains into Gorge Stream and the Mandamus River.

The Organ Range tops are visible from populated places to the east, and the proposed block, as a component of the entire Island Hills lease, has significant scenic and visual values and a high degree of natural character.

Chronically Threatened and Critically Underprotected Land Environments of New Zealand exist on the proposed block, which also has highly significant remnant beech forest, intact botanical altitudinal sequences, and under-threat species such as the At Risk *Traversia baccharoides* and the Nationally Vulnerable *Olearia fimbriata*.

The large ground beetle *Megadromus rectalis* is at or near the extent of its range on this proposed block. The block is also habitat for the Declining South Island robin, New Zealand pipit, and South Island rifleman, the Nationally Vulnerable eastern falcon, and the Naturally Uncommon black shag and kea. It provides feeding and breeding for at least seven non-threatened bird species and at least two non-threatened lizard species.

Recreational values are high. They include access to and climbing and tramping on the eastern slopes of the Organ Range, and on Nicholsons Knob. The HHCT and its Valley Camp Hut fall within this proposed block. A legal road gives access up the true left of the Mandamus River; a marginal strip, also on the true left, provides additional access along part of the Mandamus.

Natural significance is very high and will be best and most enduringly protected by the Act's 'preferred' full Crown ownership and control.

Recommendations:

- * that proposed freehold with CC2 and the significant inherent values it contains be given the protection of the Act's 'preferred' full Crown ownership and control because of the values' documented very high quality.***
- * that if proposed freehold with CC2 becomes public conservation land, a concession to operate the HHCT, including exclusive use of Valley Camp Hut, be offered the present leaseholders.***
- * that if proposed freehold with CC2 becomes public conservation land, and the present leaseholders choose not to operate the HHCT as a concession, the Department of Conservation manage those components of it falling within the proposed block as public recreation assets.***

Proposed freehold with CC1

This proposed block of around 774ha covers the northern lower slopes of the Organ Range and drains into Gorge Stream and the Mandamus River. It contains many natural features of significance. The proposed Reserves Act 1977 covenant would allow topdressing and oversowing, some spraying, and some cattle grazing.

The Mandamus River is habitat available to the Declining longfin eel and the koaro, known to exist in the area.

The landscape contains a high degree of natural character, and the block contributes to high overall visual and scenic values across the lease. The intactness and integrity of the entire property's landscape makes it significant; proposed freehold with CC1 is an important part of that.

Among many botanical features of very high significance are this proposed block's remnant beech forest, valley floor to sub-alpine area intact sequencing, and healthy examples of species under threat, such as the Nationally Vulnerable *Olearia fimbriata*. Part of the proposed block has a Critically Threatened Land Environments of New Zealand classification.

The proposed block is habitat for the Nationally Vulnerable eastern falcon, the Naturally Uncommon black shag and kea, and the Declining South Island robin, South Island rifleman, and

New Zealand pipit. It provides feeding and breeding habitat for at least seven non-threatened bird species and at least two non-threatened lizard species.

It has public recreation interest and value, including remnants of a pack track built partly by Sir Charles Upham. A legal road and a marginal strip, both on the Mandamus River's true left, give access. In conjunction with proposed freehold with CC2, the proposed block would usefully extend the wider area's recreational opportunities if it were designated public conservation land due to its high natural significance.

A need for the protection provided by the Act's 'preferred' full Crown ownership and control is triggered by the high levels of significance present in proposed freehold with CC1.

Recommendations:

- * that proposed freehold with CC1 and the significant inherent values it contains be given the protection of the Act's 'preferred' full Crown ownership and control because of the values' documented very high quality.***
- * that if proposed freehold with CC1 is redesignated as per the preliminary proposal, the covenant's monitoring regime closely follow the effects of allowed agricultural inputs, and, if necessary, prompt reduction of allowed inputs.***
- * that if proposed freehold with CC1 becomes public conservation land, the Department of Conservation consider managing the remnant pack track as an historic asset.***

Proposed freehold unencumbered

The natural values contained in this proposed south-facing block of approximately 210ha are considerably lower than those of the majority of the property, with broom covering much of it. Present recreational value is accordingly low.

Recommendation:

- * that the block proposed for unencumbered freehold title be adopted.***

Marginal strips

Island Hills has few tracks or other means of easily moving through the property legally and would benefit from a range of recreational access ways. These could be provided in the form of marginal strips, created over Organ Stream, Bush Creek, and Silver Brook (parts of which are inside the property boundary); existing marginal strips along the Mandamus River and Gorge Stream could be made more enabling by extending their length and by the establishment of additional marginal strips on opposite banks.

Recommendation:

**** that marginal strips be created through and alongside the property to improve public recreational access and enjoyment as discussed above.***

Land classification

This tenure review should, as a first priority, 'enable the protection of the significant inherent values'. Therefore, as part of the review, all property to become public conservation land should be given final classification based on the expert data that have informed the review.

Stewardship classification does not ensure protection through appropriate management and does not provide protection from exchange (Section 16A(1) of the Conservation Act 1987 says: *Subject to subsections (2) and (3), the Minister may, by notice in the Gazette, authorise the exchange of any stewardship area for any other land*); precise classifications for all parts of the property becoming public conservation land will address the Act's requirement that the review should 'enable the protection'.

Recommendation:

**** that public conservation land created by this tenure review be given specific classification as part of the process, to meet the Act's requirement of 'protection'.***

Conclusion

This submission recommends greater protection than that put forward in the Island Hills preliminary proposal for tenure review because the significant inherent values identified are of very high quality and coherence and plainly trigger the Act's 'preference' for full Crown ownership and control.

The creation of public conservation land additional to that suggested in the preliminary proposal, as recommended in this submission, will improve public recreation access and enjoyment opportunities, as will the addition of several marginal strips. The ongoing operation of the Hurunui High Country Track will further augment Island Hills' recreation profile.

Significant natural values' protection on public conservation land is uncertain unless the land has specific classification. Technical data produced to support the tenure review should be used to help the review meet the Act's requirement of protection for significant inherent values by informing specific classifications for parts of the property to be redesignated for public conservation purposes.

Yours sincerely,

Jan Finlayson,
FMC executive.

Contact: Jamie Stewart

Administrator, Federated Mountain Clubs

P O Box 1604

Wellington 6104.

04 9346089

secretary@fmc.org.nz