

26 May 2026

Land Exchange Fast-track Application
Conservation House
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submitted by email to: landexchange@doc.govt.nz



Federated Mountain Clubs of New Zealand Inc. Comments on Tukituki water storage land exchange application

Tēnā koutou Land Exchange Fast-track Application team,

Thank you for the letter of 28 April 2026 inviting Federated Mountain Clubs of New Zealand (FMC) to comment on the land exchange application¹ by Tukituki Water Security Ltd (the **proposal**). We understand that the proposal is for the exchange of 29.7 hectares of conservation land in the eastern Ruahine Forest Park for 170 hectares of nearby private land, to enable the construction of a dam and reservoir on the Makaroro river.

FMC's interest

It is appropriate that FMC be invited to comment. Our objectives include promoting and advocating for:

- Outdoor Recreation in New Zealand.
- The conservation and wise management of New Zealand's natural wild lands, mountains, lakes, rivers and coasts.
- Public access to New Zealand's natural wild lands, mountains, lakes, rivers and coasts.

Founded in 1931, FMC represents over 23,000 active outdoors people through almost 100 clubs across the country. We are therefore directly affected by the proposal.

FMC's position on the landswap

Consistent with FMC's objectives, **we oppose the proposed land exchange unless** the proposed mitigations are guaranteed by agreements to grant practical access via easements preceding any consent to the land exchange.

The land exchange is part and parcel of the proposal to build the dam, and cannot be considered in isolation from and the damage that would be done to conservation values. As such we refer to the dam and the land exchange proposal interchangeably in this submission.

The dam would have adverse effects on public access to recreation in the wider area. The effect is to reduce access to recreation activities in the wider area. This was comprehensively investigated by Opus International Consultants in 2013². We are not aware of better information, though experience in other areas tells us that recreation usage will have increased since 2013, if anything.

¹ per the Fast-track website <https://www.fasttrack.govt.nz/projects/tukituki-water-security/land-exchange-application>

² Ruataniwha Water Storage Scheme Recreation Assessment, Opus International Consultants Ltd, 2013, available on the Fast-track website as Appendix 7 of the Tukituki Water Security land exchange application: https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/23090/Attachment-08-RWSS-A9-Recreation-Assessment-OPUS-May-2013a.pdf

The Opus report found that the dam would impede access to a number of current DOC huts and routes, including:

- Barlow Hut
- Gold Creek Hut
- Sparrowhawk Biv
- Colenso Spur track
- Yeomans Track
- Ellis Hut

Opus identified adverse effects on hunting, fishing and mountain biking as well.

These effects were recognised by the Board of Inquiry, who approved the dam proposal in 2015 but found that it was **essential** to mitigate the impact of the dam by providing alternative access to the areas that would be impeded so that existing tracks could be enjoyed while the dam was constructed and beyond in the long term.

The proposed mitigations are:

- A. funding of walking and cycling tracks around the reservoir where *landowners are amenable*.
- B. construction of an access track around the top end of the reservoir linking to existing DOC tracks in the Ruahine Forest Park
- C. *in consultation with affected landowners and iwi*, construction of a new picnic/camping area featuring historical/cultural information about the Yeoman Mill Site and surrounding landscape.
- D. various options to suit boaters and fishers.

The location of the proposed new access routes is indicated on a map prepared in 2014³ and made available in connection with this land exchange application.

It would be fair to acknowledge that access into those huts and tracks routed off the Makaroro River will not necessarily be greatly impeded based on what the indicative maps proposed. However, the access to Yeoman's track and Ellis Hut appears to add considerable distance to those routes, thus limiting the appeal as a day walk and to less fit trampers, hunters, trailrunners or others.

However, our main concern is not that access to those huts and routes *can* be mitigated, it is whether they *will* be mitigated. There are several risks:

- Landowners will not be amenable (related to proposed mitigation A above).
- The funding or completion of the mitigation requirements will never happen. If these consent conditions are not complied with, FMC and other affected persons are not going to be in a position to enforce them (related to proposed mitigations B, C, D above).

FMC is therefore left in the position whereby:

- It can state categorically that access to outdoor recreation in the eastern Ruahine Forest Park is adversely effected by the proposal.
- It is possible to mitigate the adverse effects of the construction and operation of the dam on public access (less so for Ellis Hut), but there is considerable uncertainty, and even doubt, that they would be followed up on, therefore we can only oppose the proposal.

To change our position we would need much more certainty and this would include easements for new practical access routes being agreed to and in place with the landowners and confirmed funding plans for

³ Figure 3 Schedule 9 Public Access & Offset Mitigation Project Plan, page 24, Exchange of Land Overview Report, Mitchell Daysh, 16 March 2026, available on the Fast-track website as part of the Tukituki Water Security land exchange application:
https://www.fasttrack.govt.nz/_data/assets/pdf_file/0015/23082/Attachment-01-TWSL-Land-Exchange-Application-Overview-Report-16-March-2026.pdf

construction of the re-routed access routes. Landowners should be approached with urgency with a conditional agreement to grant easements in gross on standard DOC access conditions. The agreement would be conditional on consent for the land swap being granted, going some way to guaranteeing access now, but ensuring easements are not inappropriately required if the landswap is not consented and does not eventuate. If, and only if, sufficient landowners agree with our request would we change our position to support.

We also note that:

1. The dam would appear to damage the conservation value of the land and river. The land and river marked for the dam includes original native bush and mature trees, adding to an enjoyable natural landscape.
2. We have no information as to how DOC would develop the additional 170 hectares of conservation land gained through the proposal. There is little reason to believe that it will be utilised for new recreation opportunities (given the Conservation Act reforms, current DOC funding and priorities, etc).
3. We also doubt the economic feasibility behind the dam proposal, and we have concerns about the gravel load washing down from the Makaroro valley. It is possible that the proposal seems to carry significant environmental and economic risk that cannot easily be traded off against maintained access.

Nāku, nā,



Megan Dimozantos
President
Federated Mountain Clubs of New Zealand