



Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki

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Commissioner of Crown Lands
Land Information New Zealand Limited
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SUBMISSION:

From Canterbury Aoraki Conservation Board Te Runanga Papa Atawhai o Waitaha me Aoraki Ferintosh Station Pastoral Lease Tenure Review

Canterbury Aoraki Conservation Board Te Runanga Papa Atawhai o Waitaha me Aoraki (the Board) is an independent body established by the Conservation Act 1987. Made up of 12 government and iwi-appointed members, the Board represents the community of interest not only in the work of the Department of Conservation (the Department) but also in conservation in general within Canterbury.

The Board's main responsibility is to work with the Department of Conservation to determine a conservation management strategy for our area and to oversee its implementation. The process for developing the strategy involved full public consultation and hearings and the Board considers the **Canterbury Waitaha Conservation Management Strategy 2016** (the Canterbury CMS) fairly reflects the views of the wider community. The strategy contains a vision, objectives and policies for this region which are aligned with the Government's national objectives for conservation. The Canterbury CMS was signed off by the Minister of Conservation and became operational on 1 September 2016.

The 50-year vision articulated in the Canterbury CMS describes a Canterbury where

"The high-country basins retain their natural, open, unspoiled character." (page 18)

Intensification of land use is identified as a threat to outstanding landscapes in Canterbury (page 20) and, by implication, a threat or barrier to achieving the long-term vision.

It is the Board's view that if intensification of land use is one of the outcomes of tenure review at Ferintosh, the proposal will not positively contribute to achieving our long-term vision for Canterbury. **Therefore, the Board is unable to support preliminary proposals which could result in intensified land use at Ferintosh.**

One member of the Board undertook a site inspection at Ferintosh Station on 29 September 2017 and the preliminary proposal was discussed at the Board's meeting on 11 October. The following submission points were agreed, and we would request that these aspects be incorporated in any final proposal:

1. The conservation reports on which the preliminary proposal was based are old. The Conservation Resources Report is 20 years old and the Botanical and Landscape reports are 5 or 6 years old. There does not appear to have been a site-specific fauna survey or cultural assessment done. The Board is not confident that the information on Ferintosh's significant inherent values, and which underpins the preliminary proposal is robust enough to justify the designations.
2. The conservation reports identify Significant Inherent Values across the whole pastoral lease. They do not contain recommendations related directly to the designation boundaries now proposed. To the Board it is unclear that the location of designation boundaries is related directly to variation in Significant Inherent Values across the lease.
3. The Board supports the Crown retaining areas CA1 and CA 2. We consider the third smaller terrace with hummocky moraines and tarns south of Jacks Stream also meets these standards and would welcome knowing why this was not proposed as conservation area as its values seem to be very similar to the other two areas CA1 and CA2. Given these clear similarities, the Board recommends inclusion of this terrace into CA1.
4. The opportunity exists to include CA2 and an enlarged CA1 into neighbouring Ruataniwha Conservation Park. The park is *"a popular front-country destination offering day visitor, 4WD, mountain bike and walking access...from State Highway 80"* (page 49, CMS). Ruataniwha Conservation Park is also valued as a buffer for Aoraki Mt Cook National Park.

The Board supports the immediate classification and direct inclusion of proposed conservation areas coming out of the Ferintosh Tenure Review into Ruataniwha Conservation Park as part of the Tenure Review process and does not consider there is a need for the land to have interim stewardship land status.

5. The opportunity for public 4WD vehicle access to the proposed conservation areas CA1 and CA2, or to neighbouring Ruataniwha Conservation Park, has not been realised in the preliminary proposal. The proposal as it stands only supports walking access. In the Canterbury CMS, the access outcome sought for conservation parks is *"Foot access is the predominant means of reaching all parts, but this is assisted and complemented by provision for vehicle...access"* (page 51, CMS). Public 4WD access is one of the recreation activities provided for in conservation parks, and where-ever possible tenure review proposals for leases adjacent to conservation parks should, as in this case, accommodate this.

Implementing the proposals for public walking access up Whale and Jacks Streams will require the formation of new tracks in reasonably difficult terrain. It is important and necessary to formalise existing 4WD access tracks as public access easements to immediately provide easy walking access to CA1 and CA2, and to the Ruataniwha Conservation Park as well, at minimal capital cost.

6. Provision of short easy side trips for the increasing visitor numbers travelling to and from Aoraki Mt Cook National Park along State Highway 80 would have considerable recreation value and could help ease visitor pressure on other parts of the conservation estate. The location of Ferintosh on the shores of Lake Pukaki adds significantly to its inherent recreation value. By failing to maximise the recreation opportunities which exist on this pastoral lease, the preliminary proposal for Ferintosh does not “enable the protection of significant inherent values”
7. The opportunity to provide for a loop track through CA1 or CA2 which incorporates a return section along the Lake Pukaki foreshore has not been realised in the preliminary proposal. While there is existing public vehicle access to the foreshore at Whale Stream for fishing access, no further provision for lakeside recreation such as swimming, picnicking, or camping is made. Public vehicle access and provision for recreation activities could also be provided on the outwash fan near the outlet of Jacks Stream.
8. The Board supports designation arrangements at Boundary Stream which effectively exclude stock from the waterway. It is the Boards view that similar boundary alignments that extend the proposed conservation areas down the streams to State Highway 80, and to the lakeshore below the road, result in freshwater ecological values being protected from the effects of stock in waterways. In the absence of detailed information about the freshwater values of these streams a precautionary approach is required to ensure ecologically sustainable management for the long term.
9. The Board supports proposals to clear wilding conifers from the Dusky Block and regards this as urgent. However, the Board could only support free-holding this block if there is certainty that the wildings will continue to be managed to achieve total eradication and to limit further spread up the western side of Lake Pukaki. Ensuring this must form part of any legal requirements for subsequent owners.
10. The outstanding natural landscape values of the steep faces proposed as freehold must not be under estimated as they are widely visible from many locations and help to frame views to Aoraki and the Alps. The landscape report highlights the vulnerability of the Ferintosh lateral moraines to “change from human endeavour”.

If the land is free-held, the existing natural character of these sculptured moraine walls is likely to change, probably quite rapidly, through intensified land use including subdivision. This potential outcome of the preliminary proposal at Ferintosh is not supported by the Board and again protecting against such modifications must form part of any legal requirements for subsequent owners.

Hence maintaining the natural character of this outstanding landscape is critical. If this cannot be achieved, with certainty, through covenants, conditions, or other legally-binding provisions which prevent intensified land use, clearance of indigenous vegetation or other interventions which undermine natural character, then the Board does not support the alienation of this land from the Crown.

Thank you for the opportunity to contribute to the tenure review process for Ferintosh Station. We look forward to reading your decision.

Yours sincerely



Dr Mick Abbott
Chairperson
Canterbury Aoraki Conservation Board