

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Sam Stephens
Organisation (if applicable):	
Role (if applicable):	
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Classification - The current classification of Stewardship Land should be retained.
Recreational Values Report – Unfortunately, this report failed to capture the factual values, and activity participant use of the area. -DOC should be consulting with local organizations, and be engaging someone with sound knowledge of the area to construct the Recreational Values Report.

My submission is (include the reasons for your views)

Please see attached.

[illegible]

What further information sources should we consider in this reclassification?

The local hunting community – Perhaps contact the local NZDA and the NZGAC
https://southernlakesnzda.org.nz/Contact
https://nzgameanimalcouncil.org.nz/

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of [REDACTED] or person authorised to sign on behalf of submitter

02/01/2021

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

Sam Stephens - Submission

Classification - The current classification of Stewardship Land should be retained.

For reasons being:

- Increasing the Classification of this area will further hinder appropriate economic activity on neighbouring land, which in turn will have a negative impact on the global environment.
 - For example, the Nevis Valley holds significant mineral resources, mainly alluvial gold. Due to the location of most of these gold deposits, DOC will be considered an Affected Party for future Resource Consent Applications.
 - Through responsible, and well managed mining some of these resources can be extracted and the land rehabilitated in a way (pasture on farmland, native planting on PCL) that provides a net economic and ecological gain.
 - If part of the mineral supply chain is filled by projects in NZ, where we have tight regulatory control, it results in less of the mineral supply chain being filled by projects in countries such as Papua New Guinea, Indonesia, Philippines etc where there is far less regulatory control and some projects cause significant environmental damage.

Recreational Values Report – Unfortunately, this report failed to capture the factual values, and activity participant use of the area.

- Point 2 Pg 7 - National recreational activity on PCL. The author summarises the percentage of activities on PCL, but the data fails to show “Hunting” as an activity?
 - Please explain why? As it appears to be a systematic failing in either the survey design or the reporting technic.
- It is clear from the author’s brief and somewhat dismissive hunting summary (Pg 16), that he has little knowledge of the areas unique and relatively rare hunting opportunity.
 - The Remarkables PCL Area provides open country, high altitude hunting in a unique and spectacular setting. One of the reasons the areas hunting is unique is due to the lack of native forest in the valley floors. Due to this the behaviour of the Red Deer and the hunting experience is unique not only in Otago, but NZ wide.
 - Furthermore, from my experience in the area, once you are away from the main access points and within the central high altitude range, approximately 90% of the Participant Activity is Hunting. I have hunted in this area for the last 20 years, from the last 17 trips into the area I have graphed the observed participant activity (Fig 1) which shows 89 % Hunting and 11% Hiking/Climbing related.

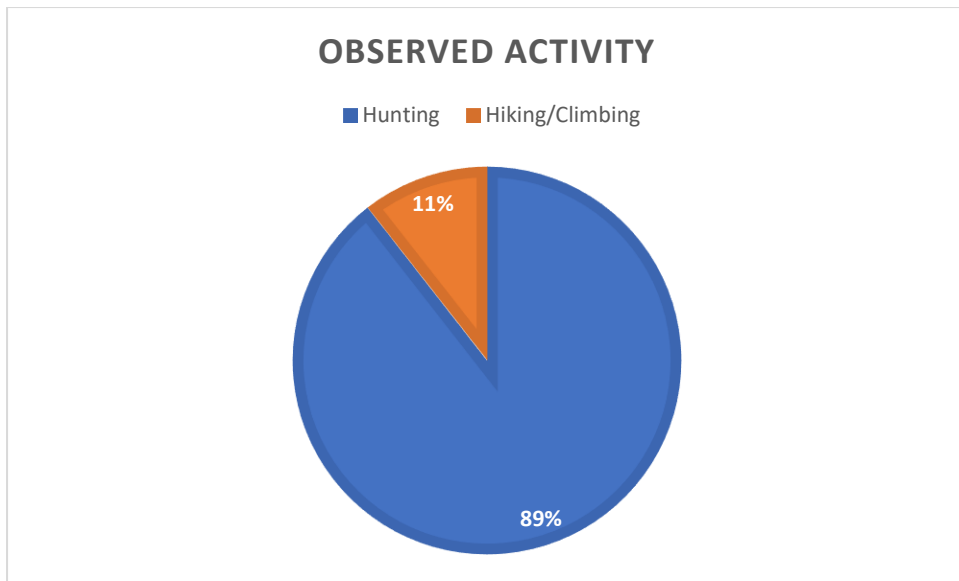


Figure 1. Pie graph showing observed participant activity within the central high altitude area of the Remarks PCL.

From: [Alpinism & Ski](#)
To: [Kawarau](#); [John Roberts](#)
Subject: remarkables redesignation
Date: Monday, 25 January 2021 10:13:02 am

Hello,

I am sending you this email as my submission (i hate doc or other bureaucratic forms and you certainly havent made it easy ie. i seed to print out form, fill it out by hand , scan or photo it and send it back! crickey....) anyyhow, hopefully you will accept it in this form....

I use the remarks as a ameateur recraetionalist and a professional mountain guide.
I go mountaineering on the remarks, i rock climb on the remarks , i ski tour in the doolons and y creek. It is an awesome recreational resource.

being east of the main divide, it is VERY useful to recreate and often if you cant do that mountain recreation due poor weather in the big mountains, remarks area is possible and great.

road access upthe ski feild road also excellent.

please do not reclassify this area in a way that stops what is happening for amateur and professional mountaineers, rock climbers, walkers, ski tourers.

i am not a lawyer, but i would have thought recreation reserve would fit dcurent use?

I get there are probably issues surrounding the access road, but paying a toll fee to go up the road i dont agree with. I thought the original deal was that in in exchange for the ski feild being allowed to be there, public access was to be allowed. If the ski feild wanted to upgrae it to ashfelt and this cost them lots of \$ and now want to cecoup it? maybe it not like that? anyhow, it should be free access by the ski feild in exchange for them having a ski feild there.

Please keep me informed if possible re where doc is taking this? Status quo seems pretty good to me.....

Cheers

Gary Dickson

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snow boarding

11 Rimu Lane, Wanaka 9305, New Zealand, Ph: 021 077 6908

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1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

☒ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

My submission is that I would like to see the retention of both recreational hunting and
Dog access within the wider Kawarau Remarkables Conservation Area as is presently
the case.

My submission is (include the reasons for your views)

--

[illegible]

What further information sources should we consider in this reclassification?

Consideration of recreational hunters and the benefit of enabling continued access provides
which includes managing deer numbers, catering for a large user group and through
minimising the Department's cost without having to send in contract hunters and
helicopters.

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

Printed name of submitter or person authorised to sign on behalf of submitter

Date

24 January 2021

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1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	James Werner
Organisation (if applicable):	
Role (if applicable):	
Email:	james.hcnz@gmail.com
Phone:	
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

My preferred classification of the Remarkables Conservation
Area.

My submission is (include the reasons for your views)

See next page.

What further information sources should we consider in this reclassification?

The current & future use of this public land, looking at
existing Conservation Parks .

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

James Werner

Printed name of submitter or person authorised to sign on behalf of submitter

28/01/2021

Date

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Kawarau/Remarkables Conservation Area
Reclassification Consultation

February 9, 2021

SUBMITTER INFORMATION

Name:
Email:
Phone:
Address:

Yes, I wish to keep my contact details confidential

SUBMISSION/PROVISION OF FURTHER INFORMATION

2.1 The specific parts of the application that this submission relates to are:

Contemporary gold mining, which is not mentioned in any of the values reports

2.2 Submission

The Nevis Valley is special because it has been mined almost continuously since the 1860's gold rush. Hence the great variety of tailings/artefacts found within a relatively small area. The Historic values report mentions this on page 12:

‘Gold mining continued in the lower and Upper Nevis into the 20th century with later operations still using the old 19th century sluicing methods such as ground sluicing and hydraulic elevating. After the Depression, gold mining by particular families continued from the 1930s until as late as 1991 in some areas, such as at Baileys Hill in the Upper Nevis and by McClean's in the Lower Nevis’

But mining in the Nevis Valley didn't screech to a halt in the early 1990's. It continued. There are still miners working the Nevis to this day. It is a common mistake to assume that gold mining has ceased – modern methods are vastly different from those used in the 19th and early 20th centuries. Most leave no visible evidence, and create no pollution. So, it is an understandable oversight that none of the five Values reports make any mention of contemporary gold mining.

In economic downturns such as the recent COVID-19 crisis, gold prices tend to rise, making gold mining viable. This provides a beautiful hedge against unemployment. Small scale mining in the Nevis currently provides valuable seasonal employment for individuals and small businesses. In today's environment, with indefinite unemployment/underemployment on the horizon for parts of Otago, it is important to keep proven auriferous ground open to ethical mining operators.

Reclassification of the Remarkables Conservation Area would directly affect six active gold permits in the Nevis area. The permit numbers are 60279, 41734, 52465, 60628, 55482, 57455 (See Figure 1) It would also create an unnecessarily high regulatory hurdle for future generations of prospectors.

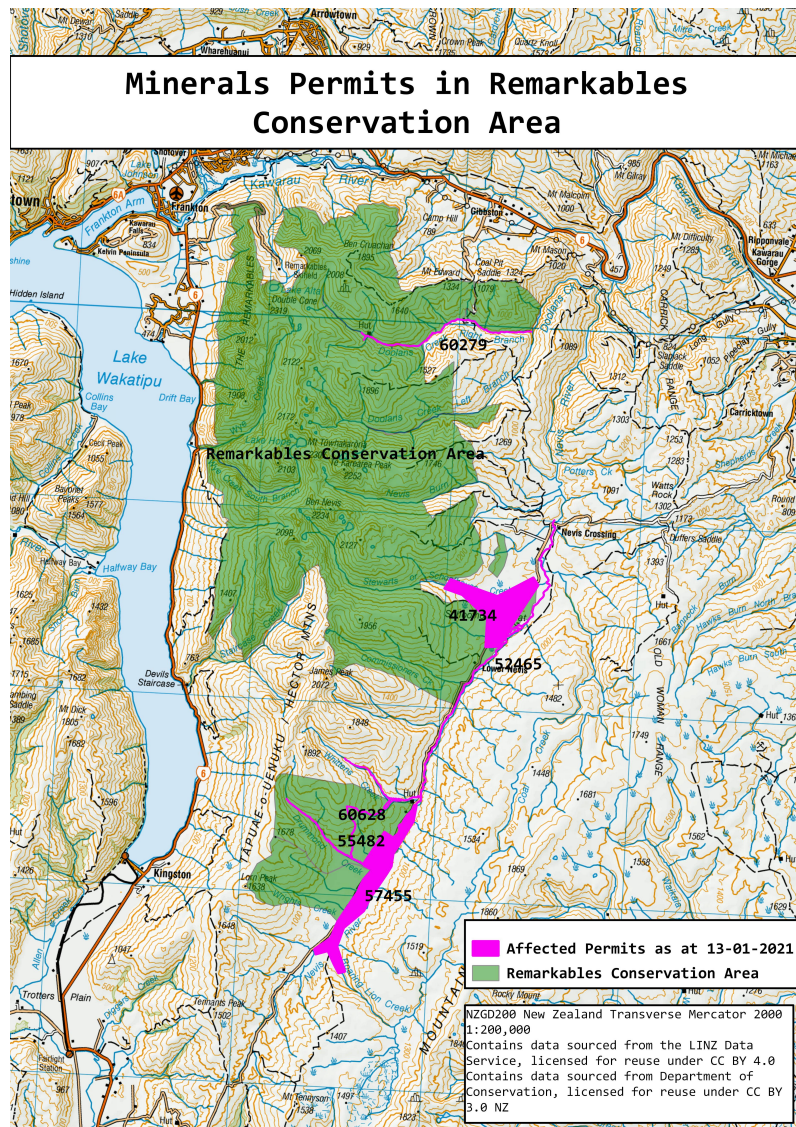


Figure 1: Minerals Permits in Remarkables Conservation Area.

‘All stewardship land held by DOC is held because of the conservation values present on the land. It does not have to be reclassified for its conservation values to be managed and protected.’

- <https://www.doc.govt.nz/about-us/our-role/managing-conservation/stewardship-land/> 2 (retrieved 01 February 2021)

2.3 Conclusion & information for DOC to consider

- I submit that DOC should be aware of, and consult with, existing mining permit holders before continuing with the reclassification process.
- I submit that all existing mining permits and exploration permits retain existing use rights and are afforded protection for the life of that claim, and any subsequent renewal including the step from exploration to mining permit.
- I submit that Kawarau/Remarkables Conservation area should retain its status as Stewardship land.

2.4 Signature

Signed: _____

Date: 09 February 2021

Kawarau/Remarkables Conservation Areas reclassification consultation Submission Form

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Paul Hughes
Organisation (if applicable):	Rewild Aotearoa
Role (if applicable):	Research lead
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Reclassification to National Park status for all current and future public conservation land in the Remarkables

My submission is (include the reasons for your views)

Rewild Aotearoa's mission is: Rewild Aotearoa to urgently act on turning around biodiversity loss, ecosystem crises, landuse pollution, and climate crises as an act of kaitiakitanga.
Rewilding that delivers great resilience and true sustainability that benefits our ecosystems, community, and economy. See rewildaotearoa.org.nz

Reclassification of any current and future public conservation land in the Remarkables to National Park status would recognise its national importance, so we would support that.

Any reclassification should also be accompanied by rewilding ecosystems that takes advantage of the opportunities that this area presents.

Rewild Aotearoa is currently researching rewilding ecosystems and legal protection of the Remarkables and surrounding areas of national importance, and plans to have an identified Rewild Opportunity published in March/April. This would enhance ecology, community and the economy in accord with Government's Wellbeing Framework.

We would like to be involved with any ongoing consideration of the future status of these public conservation lands, once we have finalised and shared our research results.

What further information sources should we consider in this reclassification?

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

A black rectangular box redacting the signature of the submitter.

Printed name of submitter or person authorised to sign on behalf of submitter

Paul Hughes

Date 13/02/2021

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	<i>Eriki Tamihana</i>
Organisation (if applicable):	
Role (if applicable):	
Email:	<i>erikit1985@gmail.com</i>
Phone:	
Address:	<i>Queenstown</i>

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

<i>What classification of land the Remarkables Conservation</i>
<i>Area should be.</i>

My submission is (include the reasons for your views)

<i>Next page</i>

The Remarkables is an area of public land that has many recreational uses and users. It is appropriate to allow these uses to continue considering the proximity to Queenstown, our adventure capital.

Because of this I believe the land should be classified
so that public uses are not restricted.

*It is known that activities such as mountain biking, skiing, horse riding, 4WDing, etc are not generally permitted in National Parks. **Therefore, the Remarkables should NOT become a National Park.***

The land currently allows for activities that many other large Conservation Parks do such as Oteake, Hawea and Ahuriri. **Therefore a classification of Conservation Park would be the most appropriate.**

In conclusion, the land should **NOT** become a National Park.

What further information sources should we consider in this reclassification?

<i>A public survey to see what the public and locals wish to</i>
<i>do in the Remarkables. If their activities generally</i>
<i>clash with what would be allowed in a national park, then</i>
do not classify the land as National Park.

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

Eriki Tamihana

Printed name of submitter or person authorised to sign on behalf of submitter

28/01/2021

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021.**

John Roberts
Statutory manager
Southern South Island
Department of Conservation.



27 January 2021.

Dear John,

Kawarau/Remarkables Conservation Area reclassification

Introduction

Federated Mountain Clubs was formed in 1931 and advocates for the backcountry and outdoor recreation on behalf of 22,000 members in nearly 100 clubs. FMC has taken, and continues to take, a leading role in the establishment of protection, and ongoing robust planning, for much of Aotearoa's public conservation land.

We welcome involvement in determining appropriate classification for the Kawarau/Remarkables Conservation Area, as that classification will provide, accordingly, for appropriate management of the land.

Forgotten Lands

In 2014, FMC launched a campaign to underline the need to assess and give bespoke classification to various public conservation land parcels classified as stewardship. At that point, it was 27 years since those lands had been grouped in that bureaucratic 'holding pen' awaiting such a process. Since inception, the campaign has been active, with respect to the broader issue as well as specific land parcels, and includes FMC's 2017 proposal of a Remarkables National Park.

Remarkables National Park

Launched with the support of Emeritus Professor Sir Alan Mark and Forest and Bird, and founded on decades-worth of information-gathering, the Remarkables National Park concept is intended to appropriately protect and honour the natural landforms, species, and communities of the Kawarau/Remarkables Conservation Area and certain other connected land parcels including portions of the Garvie and Umbrella mountains within Glenarary Crown pastoral lease (currently at the substantive proposal stage of tenure review). The document, *The Remarkables National Park* (www.fmc.org.nz/remarkablesnationalpark) is an excellent summary of the land's natural, recreational,

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and human historic values and makes an extremely strong case for establishment of a national park. It should be read in conjunction with this submission.

As *The Remarkables National Park* outlines, the concept of preserving the land as taonga, in a pact between the public and nature, has had several iterations since 1977, including conferral of national park and national reserve status. A further - 1990 - proposal suggested creation of a conservation park. As *The Remarkables National Park* points out, however, many conservation parks have since been created and time's passage has heightened scientific and public appreciation of the particular mana of the land in the Remarkables park footprint; these factors point to the appropriateness of a paramount designation for the land, as conceptualised initially. We address potential designations more broadly further in this submission.

The proposal acknowledges that the park's full spatial extent must be achieved over time. However, its two essential foundational land components, in terms of diversity and geographic footprint, are those in the Kawarau/Remarkables Conservation Area and in the Glenarary lease; with the wider tenure review process about to finish with passage of the Crown Pastoral Land Reform Bill, the Glenarary review will likely be completed shortly, and its redesignated public conservation land component will be able to be linked administratively with the land presently in the conservation area.

FMC fully understands that this reclassification process applies to the Kawarau/Remarkables Conservation Area only. However, the strong potential for contiguous and nearby lands to become public conservation land - shortly, in Glenarary's case - cannot be excluded from this discussion; the concept of creation of the Remarkables National Park, a designation that will pay appropriate tribute to the conservation area, and to other adjoining and nearby lands in the short and longer terms, must remain squarely on the table.

Comments on the public consultation documents and related recommendations

FMC appreciates the accurateness of the consultation documents provided. We observe, however, that as discrete discipline-based papers, they do not capture the 'whole' of the whenua in question, so much as addressing its discrete parts. Additionally, they paint pictures of the conservation area in relatively simple brush strokes.

We note that, for example, behind the ecological values report's statement that 320 moth species have been recorded in the conservation area, innumerable natural dependencies and interdependencies are implied; a valuable addition would be clear articulation of the existence and richness of such relationships, along with the importance of protecting them.

More broadly, it would be valuable - and accurate - for the values assessments to acknowledge those values' interdependencies on landscapes and landforms, species, systems, and recreational

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opportunities beyond the conservation area's footprint. Natural contiguousness tends to heighten conservation and recreational value significantly; this should be acknowledged in the reclassification process.

There is need for more, and better-integrated, contextual information about the human impact on the natural values of the conservation area and connected lands. It should include facts about: pre-human plants, animals, and natural systems; changes wrought by humans and associated non-naturally-occurring species; and contemporary improvements and declines in the health of natural values as management of anthropogenically-induced impacts has evolved and improved. (Looking ahead, it would be optimal, also, for information on strategy for ongoing protection of the land and, where possible, other linked lands, to be added and for the complete narrative to be made publicly available as soon as practicable after conclusion of the reclassification.)

The recreation document contains a good level of detail, which we appreciate. We would have liked to have seen certain distinctions on subtle but significant issues, however. Firstly, non-commercial and commercial activities are to a great extent addressed together. We acknowledge that there can be subtlety in the distinctions between them, but this only behoves careful, rather than limited, description; it is worth remembering that the Conservation Act 1987's s6(e) directs the Department to "foster" recreation and "allow" tourism. Secondly, it would be positive to see subtleties of the distinction between domestic and international visitation highlighted. New Zealanders develop deep relationships with Aotearoa's lands through the courses of their lifetimes, whereas overseas visitors are generally within the national border for no more than a few weeks; this, and its relevance to this process, should be illuminated in the documentation. Thirdly, the report assumes a passive, present-demand-focussed posture, offering no comment from a future- and supply-focussed perspective. It is a pity that such useful korero was not provided, as the subject is of high importance in this case.

Recommendations:

- **Assessment of the conservation area and contiguous areas' ecosystem values' health should be sought to further support appropriate reclassification.**
- **Fuller, better-integrated information about the human footprint in the conservation area should be sought to support the reclassification process.**
- **Further information on ecological and recreational carrying capacities should be sought to support the reclassification process.**

Recreation

As you know, public conservation land is to be managed for the purpose for which it is held, which is conservation. This is described as 'preservation and protection of natural and historic resources in perpetuity for their intrinsic value'.

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Accordingly, Conservation General Policy directs that: *Recreational opportunities should be managed to avoid or otherwise minimise any adverse effect (including cumulative effects) on: i. natural resources and historical and cultural heritage where required by the relevant Act; ii. the qualities of space and natural quiet, solitude, remoteness and wilderness, where present; and iii. the experience of other people.*

As noted earlier in this submission, FMC is appreciative of the detail about recreation in the supporting documentation provided but would have liked to see expert commentary on ecological and recreational carrying capacity included; proximity of a large, relatively wealthy, permanent and short-stay outdoors-focussed population centre at the doorstep of the Kawarau/Remarkables Conservation Area and other nearby lands with potential for administrative connection with the conservation area is a significant relevant consideration.

Demand for public access and activities should be expected to be strong over time, and unless this matter is turned around and approached as a supply-side matter by reclassifying the land appropriately and planning carefully, it could lead to degradation of the very values that make the Kawarau/Remarkables extraordinary and which the Department of Conservation has a statutory obligation to protect.

It is important, also, to look at the bigger picture. Natural wilderness is increasingly rare nationally and internationally. Despite this, pressure to alter it remains unremitting. The more wilderness is compromised, the greater the imperative to treasure what survives.

Given the statutory landscape, the demographic circumstances, and the parlous state of wilderness generally, ‘how’ people visit the Kawarau/Remarkables is a more germane issue than ‘how many’ people visit, (although this should not be read as diminishment of visitor volumes as an issue). Largely unmodified nature provides experiences for all comers; significantly, its inherent constraints, such as terrain challenges and elevation gain, indicate appropriate fitness and competence levels more clearly than written notifications do, and are highly effective constraints if left in that unmodified condition. Minimal modification of the Kawarau/Remarkables will mean that visitors with lower fitness and skill will be able to experience the area’s landscapes, sounds, and other natural features from the point of entrance; likewise, those with higher skill levels and seeking a variety of remoter experiences will be able to begin accessing that remoteness a relatively short distance from the boundary. In practical terms, this should mean minimal Departmental or third-party recreation development (if any trails were to be created, they should be routes, and if accommodation were to be added, campsites would be preferable to huts).

While recognition of the whenua’s collective and discrete values will, rightly, be the primary driver of the final classification of the conservation area, the classification’s appropriateness for those values’ ongoing

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care is essential also. Classification that staunchly protects nature and supports light-footed recreation is essential for the Kawarau/Remarkables Conservation Area.

Recommendation:

- **That, based on the above discussion, the Department of Conservation seek a classification that honours and strongly protects nature and supports on-nature's-terms recreation, with minimal or no modification.**

The Doolans as crystallisation of relevant issues and potential solutions

This is one of a present handful of places within the conservation area (Wye Creek and Lake Alta are significant others) in which the public-use 'tone' - and the Department's ability to manage the land in genuine accordance with statutory direction - will be determined with the reclassification and subsequent planning.

The Doolans has strong conservation and recreation values and, in its adjacency to the degraded Rastus Burn Recreation Reserve, ready accessibility. This interface is a key issue. Without strong and deliberate management, that accessibility could lead to damage to the values - and enable an exploitative public view of the broader land parcel. The conservation area's final designation must ensure the Doolans' conservation values are properly preserved and protected, and that, as part of that, recreational use is light-footed; as per above, 'how' people visit is vital to the Department's ability to properly achieve that mandate.

The reclassification process' supplied landscape report identifies that the conservation area is part of an Outstanding Natural Landscape; says of the Nevis unit, *In a national context the natural characteristics and values are considered at the highest end in terms of significance*; and identifies tourism, mining, pests, and ski area development, all of which are able to be controlled by the Department of Conservation, as threats to the Doolans. Described ecological values are high and include tarns including Lake Te Kohua, string bogs, and healthy tussocklands and shrublands.

Yet the area is presently used for walking, hunting, non-commercial and commercial biking and ski touring. Something of a balance between nature's preservation and protection, and human enjoyment, is in existence; its primary factors are: minimal modification of the land; the inherently light footprints of most human activities there; and the present limited amount of activity that degrades flora, fauna, landscape and natural quiet. This has come more from chance than design, however.

To deliberately protect the Doolans' conservation and recreation values, the Department must have a statutory mandate to keep the human imprint minimal. We iterate: this primarily concerns 'how' rather than 'how many' people visit. There will almost certainly be third parties interested in establishing

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activities with heavier footprints in the Doolans; the new classification should strongly discourage even third-party application for, let alone Departmental consideration or approval of, such activity.

Proposals to give the Doolans a more liberal classification than the rest of the conservation area, specifically to allow destruction of many of the conservation and recreation values for ski area construction, new mines, and/or tourism expansion, may be on the cards. To act on them would be a failure of the opportunity Aotearoa has to honour the land with enduring protection for its intrinsic worth.

The Doolans should be viewed - closely - as an indicator. Whatever reclassification enables or precludes on this land will strongly affect the degree and nuance of human respect for it, and the public's attitude to the wider land parcel will, to a large extent, be fostered there.

Recommendations:

- **That the Department of Conservation focus on Kawarau/Remarkables Conservation Area reclassification that will enshrine the Doolans' quiet wildness, on the principle that appropriate protection for the Doolans will serve the whole land parcel well.**
- **That the Doolans not be given a more liberal classification than the rest of the Kawarau/Remarkables Conservation Area to enable activities that are damaging to conservation and recreation.**

Potential classifications

We assume that conservation park and national park classification are primary options in this reclassification process. There are others. We address the most likely and most appropriate below, and consider combinations.

Conservation park

Although most proposals for redesignation of land in the Kawarau/Remarkables area have been for pinnacle classifications such as national park or national reserve, conservation park status was proposed in 1990. As we state above, the idea faltered as numerous other conservation parks were established, and with growth in expert and general public understanding of the Kawarau/Remarkables' extraordinarily high values. It is, however, worth reviewing the concept.

Conservation park status takes a briskly-worded approach to conservation and recreation. The Conservation Act 1987 s19(1) directs that: *Every conservation park shall so be managed- (a) that its natural and historic resources are protected; and (b) subject to paragraph (a), to facilitate public recreation and enjoyment.*

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Protection is defined this way: **protection**, in relation to a resource, means its maintenance, so far as is practicable, in its current state; but includes- (a) its restoration to some former state; and (b) its augmentation, enhancement, or expansion. Unlike the concept of preservation, it is silent on resources' intrinsic worth.

The several existing South Island high country conservation parks give some indication of how the status might serve the Kawarau/Remarkables. To a large extent, these parks 'fly under the radar'; they have local flavour and cater well to New Zealanders accustomed to using motorised transport as far as terrain allows, and to being accompanied by animals including dogs, horses, and pack animals. They are located reasonable distances from large population bases.

FMC's view is, firstly, that while the status would, on paper, allow for care for the Kawarau/Remarkables land's conservation values, it is not sufficient for the practical protection of those values. Public attitudes to conservation parks, as per above, are now well settled. While the mostly low visitor numbers in such parks elsewhere mean that such a relatively liberal classification has allowed absorption of what are, in some cases, major human impacts, the Kawarau/Remarkables' almost certain exposure to greater commercial and non-commercial pressure and higher volumes would threaten its conservation and recreation values.

Secondly, given the diversity, beauty, and might of the land, we believe that the Kawarau/Remarkables Conservation Area's classification should be one which is explicit in its respect of the land's intrinsic worth. Conservation park status does not do this in letter or in practice.

National park

Of all possible classifications, this has been proposed most often over time, and with most passion and supporting evidence. As per pages 1-2 above, Federated Mountain Clubs, supported by Sir Alan Mark and Forest and Bird, drove the most recent such proposal in *The Remarkables National Park*.

The National Parks Act 1980 uses unusually effusive language. Its s4(1) says national parks are: *for the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.*

It goes on to command the preservation of parks' naturally-occurring values and extermination of introduced ones, and, subject to these provisions, allows for public enjoyment.

It is clear that national park status is an apex classification. It is highly protective and clear that harm to natural values will not be countenanced. It is even explicit that natural sound will be protected.

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Federated Mountain Clubs | PO Box 1604 | Wellington 6104 | New Zealand/Aotearoa

Significantly, it is protective of intrinsic worth, effectively advocating for naturally-occurring species' and systems' rights to 'be', unquestioned. A first question to be asked and answered, then, is whether the Kawarau/Remarkables Conservation Area deserves such classification, on its own or in conjunction with other nearby lands as changes in their tenure allows.

FMC's view is that the land's collective conservation and recreation values do warrant such status. This has been discussed above and in *The Remarkables National Park* and needs no further articulation here. As for other of Aotearoa's national parks, our species has impacted negatively on the land, but, as for those other parks, such impacts are relatively minor and restoration work will address them reasonably well over time. Likely future addition of other lands, most notably parts of the present Glenaroy Crown pastoral lease, whose tenure review is near conclusion, does not reduce justification for the national park concept and will likely strengthen it by virtue of its own values and its proximity.

A second question, addressed below, is whether a more fitting classification is available.

National reserve

Despite present low numbers of national reserves, this high classification has been proposed in the past and should be revisited.

The Reserves Act 1977 s13(1) says: *In order to protect values of national or international importance the Governor-General may, by Order in Council made on the recommendation of the Minister, declare that any reserve that has been classified pursuant to section 16 shall be a national reserve.*

As national or international importance can be related to one or many of a raft of attributes, the status has no specific interpretation, so its purpose must be found in s3 of the Act: (1)(a) *providing, for the preservation and management for the benefit and enjoyment of the public, areas of New Zealand possessing- (i)recreational use or potential, whether active or passive; or (ii) wildlife; or (iii) indigenous flora or fauna; or (iv) environmental and landscape amenity or interest; or (v) natural, scenic, historic, cultural, archaeological, biological, geological, scientific, educational, community, or other special features or value.*

At (1)(b), it additionally gives the purpose of *ensuring, as far as possible, the survival of all indigenous species of flora and fauna, both rare and commonplace, in their natural communities and habitats, and the preservation of representative samples of all classes of natural ecosystems and landscapes which in the aggregate originally gave New Zealand its own recognisable character.*

It is deficient in not-insignificant respects. Although its preservation directive strongly implies elimination of pests, an explicit mandate for their elimination would be preferable. Its wording is very liberal with respect to recreation. And preservation of natural sound is not explicitly provided for. Weak

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planning for and management of this classification are distinct possibilities that would serve conservation and the public poorly while degrading the reserve they should protect.

However, while these deficiencies cannot be ignored, they equally do not provide explicitly for the opposite; for example, the absence of a clear imperative to exterminate pests does not mean that a management plan for the land should tolerate introduced plants and animals.

Clear points in the classification's favour are that: it is of the highest order, befitting the richness of the Kawarau/Remarkables Conservation Area; that serious degradation of crucial parts of the conservation area such as the Doolans through mining or ski area construction, for example, would almost certainly not be allowable; that it would allow forgiveness for certain circumstances and activities that other classifications may not readily let persist; and that, in this, it could be given to the entire conservation area with minimal tensions.

FMC's view is that, while national reserve status has weaknesses, the degree of recognition it confers (functioning also as warning to planners and managers that such weaknesses should not be allowed to be exploited by private interests) is a strong factor in its favour.

National reserve classification is far preferable to conservation park status, but we are not convinced that it would provide for better outcomes for the land and for the public than national park status.

Scenic reserve

Such reserves, provided for under s19 of the Reserves Act, are managed in accordance with wording similar to that of the National Parks Act. Their primary purpose is the land's preservation in perpetuity for its intrinsic worth and for public enjoyment. Indigenous species are to be preserved and, except where the Minister determines otherwise, exotic ones exterminated. It does not explicitly provide protection for natural sounds, however.

The Kawarau/Remarkables Conservation Area is best known for its scenic value, and this designation would honour that aspect of the land.

While scenic reserve classification's purpose is largely highly protective of natural values, it has notable downsides. A primary one relates to perception. Scenic reserve status does not have the cachet of national reserve classification, and, as it applies to many small, even urban, land parcels, it would be insufficient for recognition of the Kawarau/Remarkables' magnificence in much of the public mind. A further matter is that the rider on extermination of pests is exploitable.

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FMC views scenic reserve status as preferable to conservation park classification because it offers preservation and more explicit protection, and because of its specific scenic focus. We do not, however, believe it is sufficient for a land parcel such as the Kawarau/Remarkables Conservation Area.

Combinations

FMC understands the pragmatic appeal of potentially having more than one classification at play. For example, submitters may suggest The Remarkables become a scenic reserve for its much-noted scenic qualities while eastern portions of the conservation area be given conservation park status in order to continue allowance for four wheel driving and trail riding. Or that the area receive a certain broad classification with one or more specially protected areas in place to provide special protection for particular values, for example: either conservation park with ecological area status (Conservation Act s21) for protection of nature, or national park with amenities area status (Conservation Act s23A) for ski area construction, in the Doolans.

While such arrangements would provide means to soothe potential negative public responses to certain classifications (in particular, notably strong or weak ones), and we would not wish to entirely rule out the possibility that they could offer a positive outcome, the Kawarau/Remarkables Conservation Area deserves better than pragmatism; rather, it deserves to be understood and managed as a whole, and to be properly - and assertively - acknowledged through conferral of a paramount classification.

Recommendations:

- **That, in the light of the above discussion, the Department of Conservation consider only national park and national reserve classification for the Kawarau/Remarkables Conservation Area.**
- **That classification combinations be avoided as far as possible.**

A Kawarau/Remarkables National Park

Despite our openness to national reserve status, Federated Mountain Clubs' view is that Kawarau/Remarkables National Park classification is the most capable of protecting and preserving the Kawarau/Remarkables Conservation Area's values while also honouring its mana.

The present conservation area will stand on its own merits as a national park. However, the larger park proposal, put forward in *The Remarkables National Park*, and involving several other land parcels including Glenaray Crown pastoral lease land, must be kept in view. Glenaray's tenure review will likely deliver highly significant land to the park shortly (if the review is discontinued, we believe that the Crown pastoral land reforms will introduce a mechanism to allow removal of land unsuitable for pastoral use from Crown pastoral leases and that the Glenaray land will, regardless, become available by that means). While the Kawarau/Remarkables Conservation Area has abundant national park values, the addition of the Glenaray and other lands will only enhance them.

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Federated Mountain Clubs therefore wishes to reaffirm its proposal of a Remarkables National Park - or Kawarau/Remarkables National Park - with the proposal that the Kawarau/Remarkables Conservation Area become its centrepiece land parcel.

Yours sincerely,

Jan Finlayson,
Federated Mountain Clubs president.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	John Langley
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Recreation

My submission is (include the reasons for your views)

I support improving the protection of Remarkables area – that is increasing its status from Stewardship to a higher level. I don't have a strong view on what new category it should be assigned to other than it should not be a National Park. My primary reason for this

being that National Park status precludes significant activities which take place there now. For example I can currently take my dog cross-country skiing. The number of places one can exercise ones' dog in the backcountry are getting fewer and fewer. Similarly my understanding is that current law/regulations preclude the use of electric powered motorbikes- this is would shutout increasing numbers of bikers out of the park.

[illegible]

What further information sources should we consider in this reclassification?

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

A black rectangular box redacting the signature of the submitter.

Printed name of submitter or person authorised to sign on behalf of submitter

_John Langley_____

Date 20 Feb

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021.**

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Tony Perrett
Organisation (if applicable):	N/A
Role (if applicable):	Former DOC National Tenure Review Manager (Retired)
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

My submission relates to the entire notification.

My submission is (include the reasons for your views)

I was involved as the lead DOC staff manager in the tenure review of Otago and Southland pastoral leases for the period 1992 – 2013 and as National Tenure Review Manager 2013-2014, until I retired. I was the DOC representative in the tenure reviews of Cone Peak, Glenroy, Wentworth, Mt Rosa and Glen Nevis and as supervising Manager of the tenure reviews of Ben Nevis and Craigroy. Pre DOC, I was Chief Ranger Reserves for the Dept of Lands and Survey and had oversight of the Rastus Burn Recreation Reserve at the operational level.

As such, I have acquired a personal in depth knowledge of all of these land areas and other adjoining pastoral leases such as Loch Linnhe.

The lands acquired from the various tenure reviews were acquired as section 62 Conservation Act Stewardship lands generally. This was done deliberately as policy by DOC firstly to secure the land as public conservation land and secondly to provide DOC with the maximum flexibility to select in the future a more appropriate status that better reflected the significance of the values on the land.

The various resource reports provided fairly describe the values of Landscape, Ecological, Historic Heritage and Recreation on the lands. Most reports include a statement of the significance of the values present, except for the Ecological report for some reason. In my view, these statements and the description of values from the Ecological Report accurately reflect a very high level of national significance.

This then begs the question what is the most appropriate status of conservation land that reflects the significance of these values and the public interest in them.

On balance I consider that upgrading the status of these lands, both all the conservation areas, the Rastus Burn Recreation Reserve, Coal Pit Saddle Historic Reserve and Ben Nevis Scenic Reserve to National Park status is warranted and justified. The Remarkables Skifield Access Road should be included also.

The tenure reviews created several public access easements that enabled public use for walking, mountain biking, horse trekking and 4wd use. These activities have become well used by the public and they should be retained. Continued existence of some of these activities may be in conflict with National Park status. A way to safeguard these uses so they can continue to be used by the public needs to be found if the underlying conservation land becomes national park. Maybe by creating bylaws could be the way to go. They to my view constitute traditional public uses.

What further information sources should we consider in this reclassification?

None

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of submitter or person authorised to sign on behalf of submitter

20/2/21

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021.**

Do not send this page of this document with your submission. If you require additional space for providing your submission, please attach extra pages as needed and label according to the relevant section.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

☒ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

It would be greatly appreciated if we were able to be provided with further information in a form other than many written reports that have been developed in consultation with only a few interested parties.

We understand that the parties consulted are very important, especially considering they are the traditional owners, however we would simply like to request the provision of information and consultation with DOC that is in person and feel that the industry and concessionaires would benefit greatly from being afforded this opportunity.

It is not overstating matters to say that the future our businesses may depend upon the outcomes of this process if it impacts negatively on our ability to safely guide people in the Remarkables. As a result, and as previously discussed we would also greatly appreciate it if we could be provided with a better understanding as to what likely impact this reclassification process could have on our DOC concessions. To provide some context, we paid \$9 500 to DOC in January

for our concessions to be approved, we rely on the Remarkable to help introduce, train and prepare our clients to be able to operate safely in the mountains. If our concessions are now likely to be changed, we need to understand the likely impact of this as soon as possible.

In addition, we would like to request further information regarding the formal process that will be adopted to help DOC make the determination that certain values would result in a need to change classifications. One would assume that values could be honoured and respected in some cases without changes to a classification. As a result, we would appreciate understanding the process and criteria would 'trigger' values somehow leading to a need to reclassify an area as this link seems is currently unclear.

In response to the later part of this heading our submission relates to all aspects of this proposed change.

My submission is (include the reasons for your views)

Our Mission at Aspiring Guides is to 'create NZ made mountain adventures.' For the last 30 years Remarkables has been an integral part of bringing this mission to life. The Remarkables offers the people we guide the very best of what NZ has to offer. The value of the Remarkables is enhanced by its accessibility. People who are unable to trek for days, or afford helicopters are still able to access and experience this amazing landscape.

However, the accessibility should not result in one underestimating how wild and dangerous the Mountains and this place can be. Guiding in this area is not straight forward but it does allow us to help people connect with the mountains in a safe way. As our guides say, this is a very precious, unique and beautiful part of the world but the climbing is not to be underestimated.

Our team guides people in this iconic mountain range throughout the year. Access to this area provides our clients with the opportunity to build their skills and knowledge prior to undertaking other mountaineering objectives. However, the Remarkables is so beautiful and the summits so dramatic that whilst the area is used often for instruction in a variety of progressive skills development it is also an end itself with summit objectives such as Single and Double Cone.

During winter, it's also a location for our backcountry skiing and avalanche education. This is particularly helpful to assess skills and train clients before taking them into more remote areas, such as flying into Mt Aspiring or Aoraki National Parks. During winter we don't attempt many high alpine summits due to the short daylight hours and challenging winter conditions. Remarkables for many years

has been a real 'place of learning' for people who want to continue to connect with the mountains and explore beyond the more accessible tourist tracks.

Another one of the key benefits of this area is that when the main divide mountains are not accessible due to weather, often a day trip to the Remarkables is still a viable option and is enough to turn a disappointed person into a happy one. The area provides an amazing array of opportunities for training and skills development on a wide range of terrain, the trips can be part of the longer course along with a trip of their own in one of the most spectacular areas in NZ.

Ultimately the Remarkables provides people with the opportunity to experience being in the mountains, learn new skills and connect with the environment. We believe that all recreational users, whether they have chosen to do so with a guide by their side or not, should be able to access this area. The only difference is that they are more likely to have a safer experience and learn skills that will continue to serve them well in their future mountain adventures.

What further information sources should we consider in this reclassification?

It is understood that the reclassification process involves the following:

*'The process of reclassifying stewardship land usually involves surveying the land, scientific analysis of the species and ecosystems present, working in partnership with Treaty partners, **consultation with the public (which may include submissions and public hearings)**. All the cultural, historic, economic, landscape and recreational values of the land must be considered before a decision can be reached.'*

As previously discussed, we feel that whilst consultation is being undertaken extensively with some interested parties concessionaires seem to be very underrepresented in the process to date. We understand that the next step is for Ngāi Tahu and the Otago Conservation Board to propose a new classification. Whilst we have a great level of respect for these groups our understanding is that when you consider the makeup of both groups the only member that has actually run a business in the industry for a significant period of time and held concessions is Dave Vass. We could have misinterpreted the information provided regarding the board members but this is only 1 out of 11 Otago Conservation Board members. One would have thought that the values held by business owners and their clients operating in this area would have been quite significant.

We would have assumed that the views of small businesses and concessionaires operating in this area, in some cases for several decades, would have been appreciated and valued more so than what has been represented in the process to date. This is particularly the case in the current economic environment where DOC

appears to be spending a significant amount of time and money embarking on a process that may negatively impact on concessionaires being able to operate as per previously agreed upon, in this area (with the exception of the Ski field it would appear). As a result, face to face consultation with concessionaires should be undertaken prior to re-classification.

Your Signature

ter:

Printed name of submitter or person authorised to sign on behalf of submitter

20/02/2021

Date

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1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Cameron McKay
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

The proposal to reclassify the Kawarau/Remarkables Conservation area

My submission is (include the reasons for your views)

As a regular hunter, mountain biker and fisherman of conservation land in the Nevis Valley/Remarkables, I oppose any proposal to reclassify the land as National Park on the grounds that the National Parks Act allows for “introduced animals to be removed if their presence interferes with the natural wildlife”

I support the classification of the land as either Conservation Park or National Reserve but only in the event that deer, chamois and tahr are recognised therein as “valued introduced species” in terms of the Aotearoa NZ Biodiversity Strategy.

I am of the opinion that the cultural, historic, economic, landscape and recreational values of the land are not sufficient to justify a classification of **National Park**. Whilst this classification would introduce restrictions that will ensure the preservation of native plants and animals and the welfare of the Park in general, it will be detrimental to the public’s rights of freedom of entry, enjoyment of and access to, the Park.

The Remarkables provide a very high level of recreational opportunity and activity that would be otherwise constrained and limited by a range of rules and regulations that are principally designed to restrict environmental impacts. The biological scale, conservation value and biodiversity within the Remarkables is not sufficient to justify the level of protection that national park status brings with it. The recreational opportunities provided within this Conservation Area are such that they outweigh other conservation and cultural values.

I would suggest that a more appropriate level of protection can be provided by a classification of either **Conservation Park** or **National Reserve**. The Conservation Act 1987 s19(1) directs that - *Every conservation park shall be so managed – (a) that its natural and historic resources are protected; and (b) subject to paragraph (a), to facilitate public recreation and enjoyment.*

Local examples of conservation parks have found public favour with recreationalists and hunters who are accustomed to using motorised transport where terrain allows it, including the carriage of firearms with dogs, horses and mountain bikes.

Similarly, a **National Reserve** classification in terms of the Reserves Act 1977 s 13(1) will make similar provision for preservation, management, the benefit and enjoyment of the public, environmental and landscape amenity.

NA

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of submitter or person authorised to sign on behalf of submitter

_____22/02/2021_____

Date

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1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Mark Austin
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Reclassification of the Remarkables Conservation Areas
Maintaining recreation opportunities
Maintaining commercial opportunities
Developing recreation assets

My submission is (include the reasons for your views)

I support the reclassification of the Remarkables Conservation Areas into a Recreation Reserve with areas of higher protection for preservation of native wildlife and culturally significant areas for Maori as well as historic sites such as mining ruins.

The Ratus Burn Area to maintain its status as a Recreation Reserve for access and Ski Areas.

--

What further information sources should we consider in this reclassification?

The number of Ski and Snowboard Tourers in winter. The recreation report does not measure their usage in winter.
The strong increase in guided walks and guided mountaineering. These are low impact for noise and carbon as they rarely use aircraft except the Wye Creek ice climbing.

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of submitter or person authorised to sign on behalf of submitter

Mark Austin

Date 22/2/21

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or

drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021.**

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	RODNEY BELL KEILLOR
Organisation (if applicable):	
Role (if applicable):	
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

allowing a cycle trail


My submission is (include the reasons for your views)

See attached

What further information sources should we consider in this reclassification?

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of submitter or person authorised to sign on behalf of submitter

21.2.21

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office by **26 February 2021**.

Submission for Kawarau / Remarkables Conservation areas reclassification

From R B Keillor

For section 2

In summary

I oppose any change that will allow a cycleway through the Kawarau gorge

Lessons to learn from Lake Dunstan cycle trail

The Lake Dunstan trail through the Cromwell gorge, I believe has provided an important case to learn lessons particularly with the Kawarau gorge trail yet to be consented.

Looking at the Lake Dunstan Cromwell Gorge Trail several things stand out :

1. The True right of the lake had large areas untouched by machinery that were extremely valuable as a vista and geologically.
2. Placing the cycle trail along the Cromwell gorge has created significant scarring.
3. Gravel placed on the trail is not colour matched to the surroundings and so is very obvious and intrusive.
4. The camber of the trail(angle from the slope to lake side on cross section) has been sloped in such direction the surface is more obvious than need be to the observer from the opposite side of the valley. If it had been angled facing into the hillside the trail would be less obvious. As it would subtend a smaller visual angle (see fig 1a, 1b)
5. Debris from the cutting of the trail will take many years, if ever, to be covered in foliage and match its adjacent undisturbed hillside.
6. Access roads for initial construction have scarred the hillsides . Some may have been present before but they are now very obvious.

Lessons to learn from other sites

1. Remarkables access road. This remains a significant scar (constructed around 1985)
2. Clyde dam. Access and monitoring tracks have never been repaired and to this day 40 years later, remain a scar. (construction began in 1982)

Unique features of the Kawarau gorge

The Kawarau gorge is an outstanding landscape and a large part of this is because the true right is untouched by a roadway.

There are several unique features to the land over which the Kawarau trail will be bulldozed.

1. Historic sluicings. The most important concern is damage to historic sluicings. It is important we don't just regard stacks of stones as the historic feature when it is the whole area where sluicing was undertaken that is historic
2. Geological features. I am concerned that the landscape values through this region are because of the vertical elements. Cutting horizontal roads on these features will destroy the uniqueness of the area.
3. Vegetation

Proposal

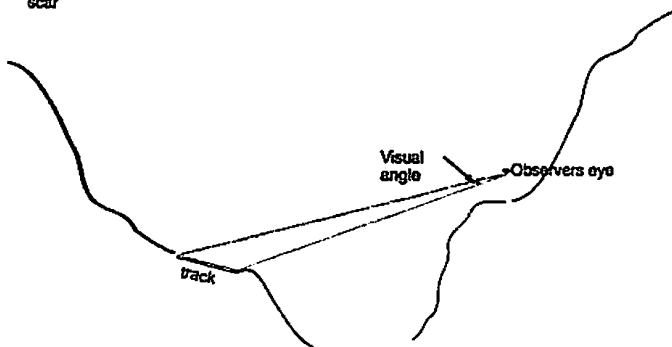
I see no way that a cycleway through the gorge can be constructed without significant scarring that will permanently destroy the current geology and vistas

I therefore oppose the allowance of cycles on the conservation land and oppose the construction of a cycleway as constructed in the Cromwell gorge. I am not opposed to a walkway that does not require any use of diggers/bulldozers or motorized equipment to move soil etc.

Moreover

- any trail must make a very light touch on the environment
- surfacing of the trail must mirror the local environment (ie 10 meter radius) through which the trail passes with respect to colour
- all cambers should be sloped to have minimal visual angle to any observer from the true left/highway (fig 1a, 1b)
- plantings should be used to camouflage cutting material and this should include their maintenance until established which may take up to 5 years. A report from a qualified ecologist to recommend plantings should be undertaken.
- Default retaining walls should be stacked stone. Wooden retainers should only be used if stacking is not possible. If wooden retainers are used then they should be camouflaged with stone stacking, particularly where the trail passes through sluicings. Stacking should continue up the hillside to camouflage the scar of the road cutting (fig 2)
- any access roads for construction be returned to original state of the environment ie erased.

1.a. camber facing river
leading to visually obvious
scar



1.b. camber facing slope
leading to less visually
obvious scar

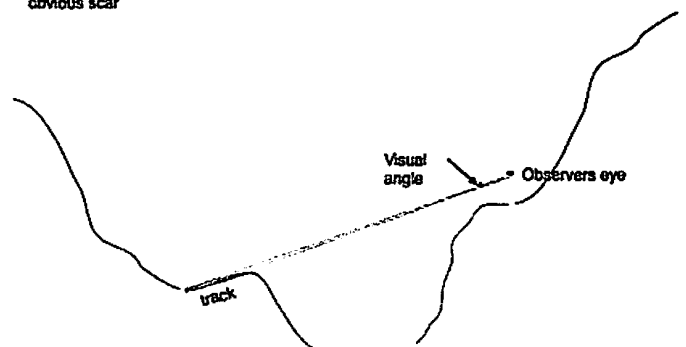
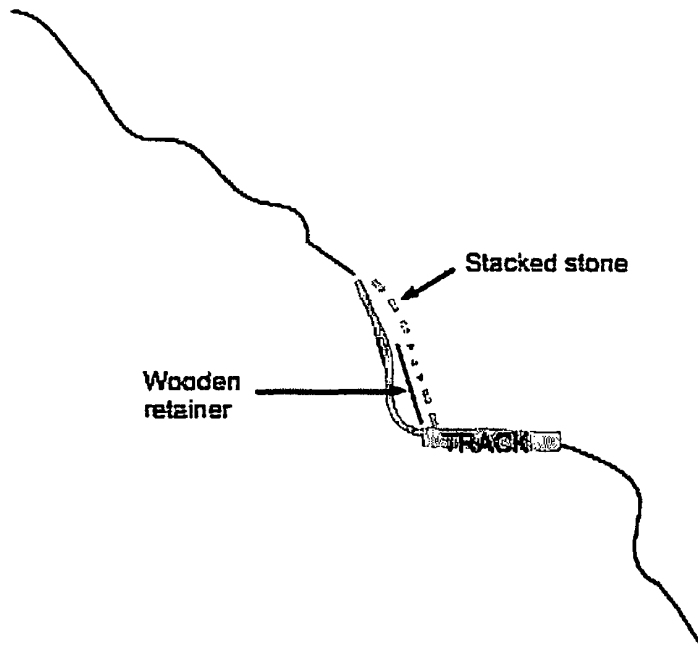


Fig 2



1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Diego Moyano - President of the Queenstown Climbing Club Philipp Green - Environmental Officer Guillaume Charton - Access, Youth Development and Maintenance Officer
Organisation (if applicable):	Queenstown Climbing Club
Role (if applicable):	See above
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Kawarau/Remarkables Conservation Area reclassification consultation That this area becomes a National Park.

My submission is (include the reasons for your views)

The Queenstown Climbing Club is a volunteer based, not for profit organisation formed in 2008 with the primary objective of supporting all forms of climbing in the region through development, access and conservation.

The Club considers The Remarkables, Doolans and Hector Range a unique place that provides an ideal alpine environment for people to discover the outdoors, to learn to respect the land and to appreciate its beauty. Should there be a greater impact on the land, fauna and flora this will mean that our local community would lose opportunities to connect with the place, for students and children to learn to respect their Whenua and for our national and international visitors to come for what the place is: preserved, beautiful and respected.

Our submission is:

- The Kawarau/Remarkables Conservation Area is a significant resource for climbers, hikers, alpinists and ski-tourers in New Zealand.
- The Club considers this area should be afforded the highest level of protection for its very high recreation, scenic, landscape and biodiversity values.
- The Club considers the areas of the Doolans, Wye Creek (upper and lower), Lake Alta and the upper west faces of the Remarkables to hold most appreciated and accessible recreation, scenic and biodiversity values and opportunities in New Zealand. We especially consider the Doolans and Lake Alta areas to be under significant pressure. These areas require careful management to ensure their unique and high values are enhanced and protected.
- We agree with Peter Devlin who, in his October 2020 Recreation Report describes the area as:
 - Having high natural, landscape, recreational, historic heritage and Ngāi Tahu values and that the 'range is one of the most outstanding natural features in a highly scenic landscape.
 - Experiencing growth from visitors of between 25% and 5%.
 - Containing the Grand Traverse, one of the best alpine outings in New Zealand, and Wye Creek as the number one for ice climbing venues in the country with consistent ice, good access, and outstanding scenery.
 - A place where once difficult areas to access recreation (in an alpine environment) is made easier by the road.
- We agree with Blakely Wallace Associates October 2020 Landscape and Visual Assessment report which describes the area as:
 - The most iconic and instantly recognisable mountain range in New Zealand.
 - Having clearly obvious and very high and outstanding visual and scenic values.
 - A place which represents an outstanding landscape resource which justifies greater protection and recognition of its values and significance in a local and national context.

- We agree with Brian Rance and Nixie Boddy who, in their October 2020 Ecological Values report describe the area as:
 - Containing biodiversity of special ecological importance.
 - Containing a very diverse flora.
 - Despite the past use and modification, most of the area remains dominated by indigenous ecosystems.

The Club has 3,600 followers on our Facebook page. In the lead up to this submission we undertook a survey to ask our followers what category of conservation land they considered the area should be classified as.

From this survey:

84% of respondents would like the Kawarau/Remarkables Conservation Area to have a National Park status.

10% of respondents would like the Kawarau/Remarkables Conservation Area to have a Reserve status.

6% of respondents would like the Kawarau/Remarkables Conservation Area to have a Conservation Area status.

The Queenstown Climbing Club considers the Kawarau/Remarkables Conservation Area should be classified as a National Park.

We would appreciate being heard at a future hearing to further detail our points regarding this matter.

Sincerely,

The Queenstown Climbing Club,

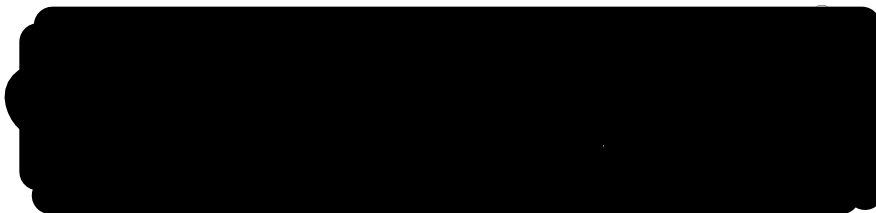
Diego Moyano - President of the Queenstown Climbing Club

Philipp Green - Environmental Officer

Guillaume Charton - Access, Youth Development and Maintenance Officer

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

A large black rectangular redaction box covering the signature area.

Printed name of submitter or person authorised to sign on behalf of submitter

Diego Moyano, Philipp Green, Guillaume Charton

Date : 24/02/2021

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Department of Conservation
PO Box 811, Queenstown 9348
Email: kawarau@doc.govt.nz

23 February 2021

Submission on Kawarau/ Remarkables Conservation Areas reclassification

As a frequent visitor to the Kawarau/ Remarkables Conservation Areas, I welcome the opportunity to comment on the reclassification of these lands.

I've visited the eastern side of the CA, e.g. Nevis burn, Schoolhouse and Commissioners Creeks from the Nevis Valley, tramping and camping in the headwaters. I've tramped and backcountry skied in the Wye and Doolan catchments generally accessing these areas from the Rastus Burn or Coal Pit Road. I've also mountain biked extensively in the Nevis Valley and Coal Pit Saddle (e.g. Ben Crauchan/ Mt Rosa etc.). From the west I've explored the Remarkables from the state highway (even before the ski field existed), and from lower Wye Creek. I've climbed Double Cone and spend multi-day trips traversing much of the Remarkable and Hector mountains. I treasure these areas for their rich biodiversity, scenic, remote and recreational values – yet largely within easy access close to home.

Remarkables as a National Park

I recommend the CAs are reclassified as National Park. Without doubt the intrinsic natural values of these areas are worthy of this top level of protection.

However, I do make this recommendation with some level of concern. This is because as the very label of “National Park” is bound to attract exactly the sort of pressures, largely from nearby tourism businesses, that have potential to further erode the very values that need protecting.

But I am optimistic. I hope a new iteration of the Department of Conservation will not be hobbled by political misdirection and underfunding that had allowed other National Parks to be managed as resources for tourism, at the expense of the true purpose of the National Parks Act. The new Park should serve as a model for how we manage our lands in a post-COVID world faced with the enormous challenge of climate change. Without doubt, managing visitor numbers and noise from aircraft and motorised vehicles will need to be a high priority. New roads, tracks and infrastructure should be discouraged. Recreational visitors, and domestic and international tourists, must “tread lightly” and leave no environmental footprint.

Reclassification also needs to consider the likely hood of including future lands nearby, for example as CPLs such as Glenary pass through tenure review. The new National Park will quickly grow in size, gaining lands with exceptional natural values (such as remoteness and natural quiet). I see a place for a winter wilderness designation in some areas of the National Park once future acquisitions such as the Garvie Mountains are incorporated.

Kind regards

[REDACTED]

John Robinson

To the Department of Conservation

Submission on the proposed Remarkables/Kawarau Conservation Park reclassification

25 February 2021

Introduction

1. The Department of Conservation has called for submissions on the proposed reclassification of the Remarkables/Kawarau Conservation Park to National Park status.
2. The proposed change is of direct interest to the work of the New Zealand Walking Access Commission and to the New Zealand public.
3. We do not object to our submission being published.
4. We would be happy to discuss any aspect of our submission.
5. Our contact is Ric Cullinane, Chief Executive | Tumuaki.
 - 027 477 5042
 - ric.cullinane@walkingaccess.govt.nz

About the New Zealand Walking Access Commission Ara Hīkoi Aotearoa

6. The New Zealand Walking Access Commission Ara Hīkoi Aotearoa is the Crown agent responsible for providing leadership on outdoor access issues. We administer a national strategy on outdoor access, including tracks and trails. We map outdoor access, provide information to the public, oversee a code of responsible conduct in the outdoors, help to resolve access disputes and negotiate new access.
7. The Commission has an office in Wellington and a network of regional field advisors throughout Aotearoa/New Zealand. An independent board governs our work. Our governing piece of legislation is the Walking Access Act 2008.

Access for a variety of modes

8. The Commission establishes, maintains and improves a range of access opportunities, including walking, cycling and mountain biking, using motorised vehicles including bikes and scooters, on horseback, with firearms and accompanied by dogs.

Value of outdoor access

9. Outdoor recreation provides a range of direct and indirect benefits to communities and the country.
10. Outdoor recreation is both a means to an end (health, fitness, therapy, regional development, pest control and tree planting), and an end in itself (fun, satisfaction, connection to nature). Participation in outdoor recreation occurs across our lifetime. It contributes to regional

economies, community, and social wellbeing, and understanding of conservation and biodiversity outcomes.

11. Research also shows positive links between mental health and outdoor recreation and access to green space. For instance, Sport NZ has linked outdoor physical activity to mental wellbeing (e.g. Active NZ - Recreational Physical Activity and Mental Wellbeing, Sport NZ 2018).
12. Free, secure, and practical public access is crucial to enable outdoor recreation. Without legally secured, free and practical access to the outdoors, it is impossible for many people to recreate in it.

The Commission's engagement with the reclassification proposal

13. The Commission's primary interest is ensuring access to the proposed National Park is secured and maintained.
14. The Commission submits that if National Park status is granted, existing access tracks and modes must be maintained.
15. While the Commission acknowledges the proposed reclassification applies to existing public conservation land parcels, public access must be seen in the wider context of adjoining land. The Commission has made access recommendations on the Glenaroy land tenure review process and will work with Queen Elizabeth II National Trust (QEII NT) to ensure enhanced public access over the proposed covenant on Remarkables Station. Other opportunities to improve access through change in tenure of significant adjoining properties will continue to enhance access to the proposed National Park.

Structure of the Submission

16. The Commission has provided an overview (Table 1) and map (Figure 1) of public access rights in the Remarkables/Kawarau Conservation Park.

TABLE 1: Access roads and easements to the Remarkables Conservation Area

Access Point	Legal Status of Access	Additional Information	Issue
[1] Remarkables Access Road	Public Access Easement 5207759.1 Crown land set apart as an access road reserve.	Valley floor carpark access is off State Highway 6, 2km south of Frankton. Access road passes through freehold title (PAE) before arriving on Crown reserve land.	PAE allows for payment of a reasonable fee. A \$10 toll is currently charged outside of winter ski season.
[2] Lower Wye Creek Track	Track falls on conservation strip and private title (no Public Access Easement)	Valley floor carpark access is off State Highway 6, a short distance from Wye Creek.	Track passes over private title (OT18D/1023) <u>with no PAE</u>
[3] Coal Pit Saddle	Legal road to/along Coalpit Saddle	Legal road is accessed off Coal Pit Road, Gibbston Valley. This rough 4WD track runs along Coal Pit Saddle leading to Glenroy Water Race Track/Ben Cruachan or Mt Rosa Track.	Legal road provides for vehicle and motorbike access which has, in some cases, contributed to damage of adjoining Crown land.
[4] Mt Mason/Mt Rosa track	Public Access Easement 5012561.4	PAE is accessed via carpark at Victoria Flats on SH6, Gibbston Valley.	
[5] Nevis Road, Bannockburn side	Legal road east to west via Duffers Saddle bisects Old Woman Range Conservation Area and Remarkables Conservation Area	Legal road is a 4WD track. Nevis Rd to Commissioners Creek to Southland district boundary closed to vehicles from 1/6-30/9 annually	Misalignment of formed road and legal road parcel in some areas.
[6] Nevis Road, Garston side	Legal road west to east via Nevis Crossing to Duffers Saddle bisects Hector Mountains Conservation Area	Legal road is a rough 4WD track. Nevis Rd to Commissioners Creek to Southland district boundary closed to vehicles from 1/6-30/9 annually	Misalignment of formed road and legal road parcel in some areas.
[7] Wentworth Track	Public Access Easement 5682579.1	Access on foot or MTB. Intersects with Coal Pit Road (between Doolans Crk Right Branch and Doolans Crk Left Branch)	
[8] Dark Elliots Track [9] Sunny Elliots Track	Public Access Easement 9931232.1	Access on foot, horse or MTB. Track closed 15/10 – 30/11 annually for lambing	
[10] Ryder Scotchmans Creek	Public Access Easement 9931232.3	Access on foot, horse or MTB.	
[11] Glen Nevis Access Track	Right of Way Easement 6050066.3 Conservation Covenant 6050066.4	Access on foot, horse or MTB. Conservation Covenant area adjoins Hector Mountains conservation area and provides for public access.	Track does not appear on DOC website.
[12] Glen Nevis Station Road	Legal road from valley floor continues to Hector Mountains Conservation Area	Legal road provides for access by vehicle, horse, by bike or on horse, with dogs and with firearms.	Formed road ends where easement 6050066.3 begins

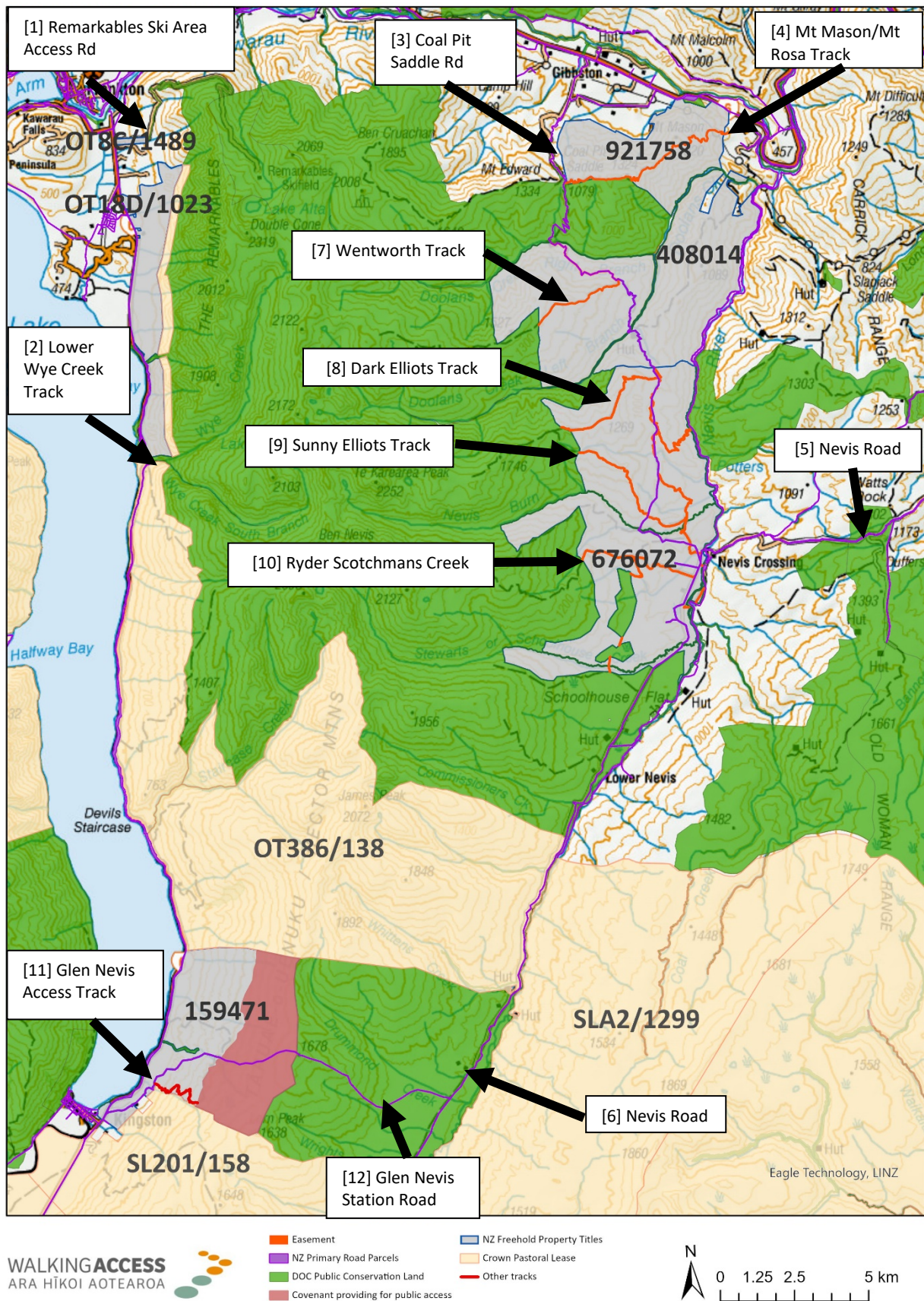


FIGURE 1. Existing public access to Remarkables Conservation Area

Recommendations

17. Remarkables Ski Field Access Road

Notwithstanding access easement 5207759.1 allowing for charging of a reasonable fee to access the Remarkables Ski Field Access road, the Commission believes this is contrary to:

- National Parks Act 1980 which guarantees *“the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features”* and;
- Conservation Act 1987 which provides that *“the entry to and use of conservation areas by the public shall be free of charge”*.

Should the reclassification occur, the Commission recommends this access easement condition is addressed (through amendment or land purchase) to provide for free, year-round entry.

18. Wye Creek

Marginal Strip exists up both banks of Wye Creek but is largely unusable for access given the terrain. Current access up the formed track from State Highway 6 to the carpark area partially crosses adjoining freehold land, for which no formal access easement exists. The owners of this land are in discussion with QEII National Trust with a view to placing a covenant over some or all of this block. The extent of the proposed covenant is unknown. The covenant is an opportunity to secure enduring access and the Commission recommends the Department works with QEII NT and the landowners to ensure this.

19. Increasing access points

As opportunities arise in adjoining properties, through land tenure disposal, Overseas Investment Office notification or in other ways, the Commission recommends the Department actively seeks out and supports improved access opportunities.

20. Legal road parcels

Misalignment of formed road/track and legal road parcels is not uncommon but can present barriers to entry. The Commission recommends the Department work with territorial authorities to seize opportunities to realign formed road/track with legal road parcels where opportunities arise.

Conclusion

Thank you for considering this submission from the New Zealand Walking Access Commission.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Steve Mackie
Organisation (if applicable):	Helicopters Queenstown 2020 Limited
Role (if applicable):	CEO
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Is there a need for change? The current conservation protection strikes the right balance between all forms of park users and the preservation of the conservation area.
The potential adverse effects from reclassification.
Improving visitor access to the conservation area.



[illegible]

What further information sources should we consider in this reclassification?

[illegible]

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

A black rectangular box redacting the signature of the submitter.

Steve Mackie – Glacier Southern Lakes Helicopters

Printed name of submitter or person authorised to sign on behalf of submitter

25/02/2021

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Steve Mackie
Organisation (if applicable):	
Role (if applicable):	
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Why I frequent the conservation area and what is important to me.
Improving visitor access to the conservation area.
My views on reclassification of the Conservation Area.

My submission is (include the reasons for your views)



Department of
Conservation
Te Papa Atawhai

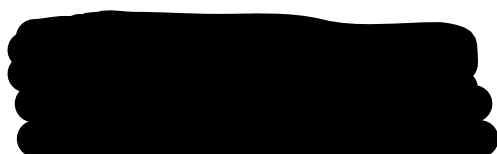
DOC - 6514452

New Zealand Government

<p>I'm an active user of the Remarkables conservation area, I regularly trail run and have covered large areas of the main Remarkables area and the block east of Kingston in the Hector Mountains. Additionally, I occasionally ski tour, tramp, hunt, walk and very occasionally climb in the conservation area.</p> <p>As outlined in the values reports there are some notable features of this conservation area. Although the scenery and topography of the area are major drawcards, from my perspective the main reason I access the park so regularly is its proximity to Queenstown (where I work) and Kingston (where I live).</p>
<p>Access is very important to me, I regularly access the area through Wye Creek and the easement through Glen Nevis Station (who I would like to commend for always providing access, as this is not always the case from stations in other provinces).</p> <p>I use the Remarkables Ski Field Access Road less frequently now than in the past because of the road toll. I find it very surprising that a private operator can charge for access to conservation land. I'm aware that the general public using the road will lead to some road maintenance costs for that company, but it should be an underlying cost to their business for being able to operate on publicly owned DOC land. The toll has negatively impacted my use of the park and I would suggest this review is an ideal time to assess if allowing this toll is in the interest of the general public or DOC's strategy to increase visitor experiences.</p> <p>In an ideal world it would be great to see additional access points into the park, but overall, aside from the toll road issues I feel that this is not an issue of significance.</p>
<p>It's commendable to have discussion on increasing protection of the conservation area, however I don't feel that there are any strong fundamental reasons for a change of status.</p> <p>The current protection afforded to the Remarkables conservation area is already in line with the values outlined in the consultative values reports.</p> <p>I recently read an article by the FMC proposing that the area should be designated National Park status and that its area could be extended to include possible Glenarary Station tenure review land. Although the scenery and topography is fantastic I don't believe the area is of National Park standard. Particularly the ecology has been greatly changed over time. Additionally, I also don't think it would be appropriate for a National park to cover multiple isolated blocks of land which would be the case if Glenarary tenure review land was to be included.</p> <p>There should be strong fundamental reasons for a change of this nature and I fail to see any material case for it. For the reasons outlined above I believe the current protection afforded to Stewardship land remains appropriate for the Remarkables Conservation Area.</p>

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

A black rectangular box redacting the signature of the submitter.

Printed name of submitter or person authorised to sign on behalf of submitter

26/02/2021

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021.**

1. Kawarau/Remarkables Conservation Areas reclassification consultation submitter information

Name:	Lindsay Smith
Organisation (if applicable):	New Zealand Alpine Club (NZAC)
Role (if applicable):	President
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The New Zealand Alpine Club

The New Zealand Alpine Club (NZAC or Club) is a volunteer organisation which was founded in 1891. It has approximately 4500 members and is a respected founding member of the international climbing federation, the UIAA.

Purpose

Under its Rules:

B.1 The purposes of the Club are to:

- a) encourage mountaineering, rock climbing and allied activities and the enjoyment and conservation of mountain and rock climbing regions;
- b) bring together those interested in climbing; and
- c) do anything necessary or helpful for the above purposes

B.2 The Club aims to provide services for climbers, protect the interests and safety of climbers, and promote climbing activities.

B.3 Pecuniary gain is not a purpose of the Club

Under its Strategic Plan (**attached**) the Club wants to:

1. Foster all forms of climbing (mountaineering, ice and mixed climbing, ski-mountaineering, traditional rock climbing, sport climbing, bouldering and indoor climbing);
2. Inspire, inform and educate climbers;
3. Enable a vibrant, sustainable climbing community; and revere and conserve maunga, crags, boulder fields and all climbing areas.

It does this through the five key objectives listed in the Strategic Plan:

1. Encourage and promote climbing,
2. Promote respect for and conservation of climbing areas,
3. Bring climbers together,
4. Provide services which enable and support climbing,
5. Develop climber skills and enhance their safety.

The Club undertakes a wide variety of activities to meet these purposes and objectives including advocacy work (such as this submission), publication of guidebooks and periodicals, operation of 16 huts and lodges across the country, social meetings and events, instruction (both volunteer and professionally led) and trips and meets.

Structure

The NZAC is governed by an elected Board.

The Board comprises the Club President, the Past President, President Elect, four elected Board members and two Section Council representatives, elected by the Section Council.

Head Office, in Christchurch, has three full-time paid employees: the General Manager, Publications Editor and Programme Coordinator provide administration, planning and oversight for the activities of the Club.

There are also 12 regional Sections which facilitate Club activities at a local level. Each of these are governed by a volunteer Section committee. Each Section has one representative on the Section Council which makes recommendations to the Board. The purpose of the council is to discuss matters specific to the running of Sections. It elects two members to the Board. This submission has been prepared with direct input from the Southland, Central Otago and Otago sections, as they represent the members who are most closely associated with the subject of this submission.

The NZAC's submission scope

The scope of this submission is limited to registering the NZAC's interest in the Kawarau/Remarkables reclassification process and highlighting the Club's use and enjoyment of the area. In particular, the Club understands that:

- The purpose of this first stage of consultation is to provide further information on the area or if reports that have been provided are missing anything, including information on the use of the relevant area; and
- The Department will then notify a reclassification/s proposal for a further round of public consultation and submission.

Accordingly, this submission only addresses the first stage matters, and is made without prejudice to any submission it may make on the merits or otherwise of subsequent reclassification/s of the area.

As noted above, in accordance with its Strategic Plan, one of the Club's strategic priorities is promoting "respect for and conservation of climbing areas". This lies at the heart of the Club's submission.

Therefore, the NZAC's interest lies primarily in the significant recreational value of the Kawarau/Remarkables Conservation Area (**Area**), particularly in ice and rock climbing, and ski touring and ski mountaineering. These recreational activities are discussed in the Kawarau/Remarkables Conservation Area Recreation Values report (**Recreation Report**) at 8.8 and 8.9.

The NZAC is also interested in the other assessed values; landscape, ecological, and Ngāi Tahu's relationship with the land. The NZAC has a deep respect for the natural environment, as embodied in the its Strategic Plan.

The NZAC would like to draw to attention that, while the Recreations Report, Landscape Report, Ecological Report, Historic Heritage Report and Ngāi Tahu Report have been presented individually for the purposes of consultation, they are in fact all related and reinforce the high value of the Kawarau/Remarkables Conservation Area. For example, the high value landscape, ecological, the historical and cultural significance fosters a high value recreational experience for members using the area. The NZAC has however structured its submission under the titles of these values for consistency.

NZAC Submission

1. Kawarau/Remarkables Conservation Area Recreation Values

The Club and its members regard the values of the Area as highly significant for the purposes of climbing (in its broadest sense). Its varied terrain and seasons support a wide range of climbing disciplines including mountaineering, rock, ice and mixed climbing, alpine tramping and (non-commercial) ski touring. The area provides relatively easy and safe access to high quality alpine environments for climbers of all abilities.

The NZAC agrees with the information outlined in the Recreation Report, particularly in sections 8.8 and 8.9.

Club members have been climbing in the Kawarau/Remarkables since the 1890s. Malcom Ross, one of the Club's founders, climbed on Double Cone and Single Cone with various companions, including his brother, Kenneth, and Harry Birely, the hotelier and guide from Glenorchy. Their activities were recorded in the first volumes of the New Zealand Alpine Journal. Since then, Club members have been involved, amongst others, with most developments including harder rock climbs, and the establishment of ice climbing in the head of Wye Creek.

The mountains in the Area are now heavily used by the NZAC and its members (and non-member climbers) for recreational and instructional purposes. The Area is close to our Southland, Otago and Central Otago Sections currently comprising of 914 members. Its proximity to major Highways makes the area easily accessible and popular for climbers in the region and from further afield.

On the northern end of the Remarkable Range the relatively gentle and accessible terrain around Lake Alta provides ideal terrain for running instruction courses. These are critical for, not only enabling new climbers to experience the sport, but also to ensure climbers are able to develop their skills and increase levels of safety. These courses form a substantial part of what the Club offers to its members. Both the Central Otago and Southland section hold their annual snowcraft courses here (and have been doing so for 20 years), and national leader training also takes place here.

The terrain around Lake Atla is also used for bouldering. Single and Double Cone are frequently visited by Club members, (and climbers generally) with the Grand Traverse being a very common objective also. This area contains a number of high quality multi-pitch rock, ice and mixed climbing routes. Therefore, the area is unique in that it provides a broad range of climbing opportunities for beginners through to advanced climbers within a relatively short proximity.

Further to the south, Wye Creek is popular for both rock and ice climbing. Ben Nevis, Two Mile and the southern end of the Remarkables Range are commonly used by members wanting longer trips into the range, including multi-day ski-mountaineering and alpine tramping trips.

An associated organisation, The Expedition Climber's Club also runs an annual meet called The Remarkables Ice and Mixed Festival. This is one of the largest mountaineering meets in New Zealand, where over a week in mid-winter, volunteers organise and run a large variety of trips and courses for climbers. The Festival's courses cover everything from ski touring, rock climbing, ice climbing, dry tooling, mixed climbing and also basic and advanced snowcraft.

NZAC members strongly value the Remarkables Conservation Area for its recreational values. The NZAC therefore submits:

1.1 Maintain the ability to run instruction courses

It is critical therefore that the NZAC and its members can continue to run both professional and volunteer led instruction courses in the area. The easy access to Highways enables members across the lower South Island to access the Area and enhance their climbing knowledge, experience, technique and safety.

1.2 Improve and protect public access

Free unimpeded public access to conservation areas at all times should be a high priority. Public access to the Remarkable Conservation area is vital. As it stands, there are few practicable access points to the land, and a number of them require landowner approval. It is important to consider both the current access, and opportunities for providing easier access to recreational areas.

The Area can be accessed from Garston via the Garston – Nevis Valley – Duffer Saddle Road as well as the Frankton to Garston Road (SH 6) and Coal Pit Road in the Gibbston Valley, and an important matter is protecting access from public roads to the conservation area. The current \$10 seasonal fee mentioned in the Recreation Report is a barrier to our members accessing the valuable training area and routes around and above Lake Alta. It creates an additional logistics and financial burden for those accessing public conservation land. The Area's classifications/s should enable the Department to re-negotiate free unimpeded access as a top priority.

2. Kawarau/Remarkables Conservation Area Landscape Values

The NZAC and members value the Area for its wide variety of terrain and scenic landscape. We agree with the High Value classification recommended by the Landscapes Report. As a core Strategic Objective to "Promote respect for and conservation of climbing areas" we share the concerns raised in the Landscape report regarding the fragmentation of land parcels, expansion of tourism and the Remarkables Ski Field developments.

Therefore, the NZAC Submits:

2.1 Further commercial development within the Area's boundaries should be prohibited or strongly discouraged.

This includes any expansion of the ski field beyond its current boundaries or new infrastructure proposals elsewhere within the Area.

2.2 Notwithstanding recommendation 2.1 we suggest that provisions could be made by DOC to mitigate visitor impacts.

The Department may deem it necessary to manage impacts and provide appropriate infrastructure for recreational users, for example, toilet facilities at Lake Alta, subject to protecting the values of the Area.

2.3 Future expansion of the Area's boundaries to include the neighbouring conservation areas should be considered.

Although not currently under the scope of this proposal it should be considered that neighboring conservation areas and pastoral lease lands under tenure review could also be added to the proposed conservation park and given a higher level of protection.

2.4 The intrinsic values of the Area should be preserved, especially in relation to their vulnerability to noise effects.

Aircraft and landings detract from the quietness and the sense or remoteness (i.e the intrinsic values our members seek to enjoy). Current aircraft concession levels should be maintained or decreased and not be increased.

2.5 Bolting within the Area should be kept maintained and safe.

Bolting for the purposes of climbing is currently present within the Area boundaries. Bolting is a critical aspect of enabling safe climbing on some terrain. The NZAC would like to highlight the need for a mechanism to ensure any existing bolting remains maintained, so it does not pose a risk to any member within the climbing community.

3. Kawarau/Remarkables Conservation Area Ecological Values

The NZAC Strategic Plan outlines the Club's commitment to promote environmental sustainability. As such we value the ecological values described in the Ecological Report. Many of our members feel a deep connection to the ecology our National Parks and Conservation Areas and are involved in conservation activities.

Therefore, the NZAC Submits:

3.1 The future classification should preserve, protect and promote the enhancement of Ecological Values.

4. Ngāi Tahu Report

NZAC agrees with the Ngāi Tahu report. The Strategic Plan states that the Club will engage with associated organisations, iwi and hapū in a spirit of good faith and partnership. In this regard the Club considers that Ngāi Tahu is best placed to identify the cultural values, practices and associations in relation to the Area (and within its rohe generally).

6. Conclusions

The Remarkables Conservation Area is a high value climbing location for the Club and is treasured by our members, and the wider climbing community. In principle the NZAC supports the proposal to reclassify the Remarkable Conservation Area. The NZAC believes the new classification should reflect the high value of the Area and offer additional protection from further commercial development - while fostering recreational access and conservation. The NZAC acknowledges that the decision around the land classification has yet to be made and this submission is made without prejudice to any submission it may make on the subsequent reclassification/s of the area. The Club believes a subsequent round of consultation once a proposal has been drafted is necessary so the proposal can be considered in full.

The NZAC would like to thank the Department of Conservation for this opportunity to hear our views at this initial stage and would like to remain involved in the consultation process.

What further information sources should we consider in this reclassification?

The following two links provide more detailed information about climbing in the Area:

https://climbnz.org.nz/nz/si/otago/the-remarkables?fbclid=IwAR3yh_0RcLGfGz8thWx5EknyB-RSzoO6Stq7ri2XTNxN7yQ2DoOkCeo3roU

https://queenstownclimbingclub.com/guidebook-1?fbclid=IwAR0SXudCdbfswcQSsSjW1dfI4SyTfuM83x_VDRQwkTpnOIOJehDhEbF7mLw

Please note that the Club's Strategic Plan has been attached with this submission, for reference.


3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter

Lindsay Smith

Printed name of submitter or person authorised to sign on behalf of submitter

26 February, 2021
Date

PURPOSE	To foster climbing				 NEW ZEALAND ALPINE CLUB
	To inspire, inform and educate climbers				
	To enable a vibrant, sustainable climbing community				
	To revere and conserve maunga, crags, boulder fields and all climbing areas				
Climbing n. all forms including mountaineering, ice and mixed climbing, ski-mountaineering, traditional rock climbing, sport climbing, bouldering and indoor climbing					
OBJECTIVES					
1. Encourage and promote climbing	2. Promote respect for and conservation of climbing areas	3. Bring climbers together	4. Provide services which enable and support climbing	5. Develop climber skills and enhance their safety	
Our code: safe, responsible, friendly, reliable, inclusive and honest – like any good climbing partner					
STRATEGIC PRIORITIES					
1.1 We are recognised as the NZ authority for climbing related activities.	2.1 We advocate for climbing areas, for access and retention of their special character.	3.1 We support and encourage local and regional climbing events, trips and meets.	4.1 We maintain NZAC’s long term sustainability.	5.1 We provide a national, standard framework for all NZAC climbing activities.	
1.2 We create and maintain high quality climbing information.	2.2 We promote environmental sustainability in all climbing activities.	3.2 We are growing the diversity of our membership	4.2 We have effective membership management in operation.	5.2 We provide opportunities for individual climbers to develop their skills and experience.	
1.3 We run national events to promote the Club and climbing.	2.3 We engage with associated organisations, iwi and hapū in a spirit of good faith and partnership.	3.3 We foster volunteerism within the Club	4.3 We ensure our investment in the hut network benefits members.		
STRATEGIC ASSETS					
Community standing Volunteers Home of Climbing Sections Huts Publications ClimbNZ					

STRATEGIC PRIORITIES	KEY FOCUS	MEASURE OF SUCCESS
1. Encourage and promote climbing		
1.1 We are recognised as the NZ authority for climbing related activities	NZAC enhances relationships with associated organisations, Iwi, Government departments, NGOs and media organisations.	Board reports show effective growth in relationships and exposure.
1.2 We create and maintain high quality climbing information	NZAC Editor, publications, guidebooks and ClimbNZ are supported and funded.	Annual publishing programme agreed, included in Annual Plan and achieved.
1.3 We run national events to promote the Club and climbing	NZAC organises and supports a range of national events to enhance funding and to promote Club and climbing.	Annual national events programme agreed, included in Annual Plan and achieved.

2. Promote respect for and conservation of climbing areas		
2.1 We advocate for climbing areas, for access and retention of their special character.	<ul style="list-style-type: none"> Access support capability established and used to build effective partnerships with landowners, DOC, NGOs, Māori and Aborigine representatives. 	<ul style="list-style-type: none"> Access support established. Funding established. Access actions completed.
2.2 We promote environmental sustainability in all climbing activities	<ul style="list-style-type: none"> Create or link to exiting sustainability information and distribute to climbers. Encourage climbers to volunteer for local/national conservation campaigns. 	<p>Board reports shows distribution of relevant information.</p> <p>Section reports identify contributions to environmental and conservation events.</p>
2.3 We engage with iwi and hapū in a spirit of good faith and partnership.	<ul style="list-style-type: none"> Identify and actively build relationships with relevant iwi and hapū - and Aboriginal people where appropriate. Encourage and promote the use of te reo Maori by the Board, staff and membership of NZAC. 	<p>Feedback indicates that the Club is positively engaging with iwi and hapū.</p> <p>The Climber, Journal and Board communications to members use simple Maori terms where appropriate.</p>

STRATEGIC PRIORITIES	KEY FOCUS	MEASURE OF SUCCESS
3. Bring climbers together		
3.1 We support and encourage local and regional climbing events, trips and meets	<ul style="list-style-type: none"> NZAC supports Sections to run local and regional climbing events to benefit members, create climbing communities and encourage new membership. 	<ul style="list-style-type: none"> Annual Section reports demonstrate an increasing number of events with increasing member attendance and new-member signups.
3.2 We increase the diversity of our membership	<ul style="list-style-type: none"> Create more pathways into climbing for youth. Increase proportion of women: climbers, club members, Section, Board and sub-committee members. Develop and implement programmes which evolve NZAC membership to reflect New Zealand population demographic. 	<ul style="list-style-type: none"> Reporting shows decreasing average membership age. Annual reporting shows increasing representation by women in all areas. Programmes implemented which expose climbing to wider range of participants and potential members.
3.3 We foster volunteerism within the Club	<ul style="list-style-type: none"> Create and implement policies and practices to support volunteerism. Develop and implement volunteer support and recognition procedures in line with industry best practice and NZAC needs. Volunteer development resourced to foster capability and encourage long-term membership commitment. 	<ul style="list-style-type: none"> Policies and practices supporting volunteerism are developed and in use. Annual reporting shows NZAC volunteers are well-supported, have increased capabilities. Annual reporting shown increasing proportion of long-term NZAC members.

STRATEGIC PRIORITIES	KEY FOCUS	MEASURE OF SUCCESS
4. Provide services which enable and support climbing		
4.1 We ensure NZAC's long term sustainability.	<ul style="list-style-type: none"> Strengthen club funding by creating alignment with funder requirements where appropriate Staffing plan and succession plan developed and approved Maintain and strengthen NZAC-Banff relationship. 	<ul style="list-style-type: none"> Effective relationships provide opportunities for successful funding applications. Approved staffing and succession plan implemented as programmed. Long-term Banff contract maintained and strengthened.
4.2 We have effective membership management systems and processes in operation.	<ul style="list-style-type: none"> Staged upgrade programme developed and approved. 	<ul style="list-style-type: none"> Approved project stages successfully implemented on time and within budget
4.3 We ensure our investments in NZAC huts and lodges benefit members and users.	<ul style="list-style-type: none"> Members and users value NZAC huts and lodges Strengthen NZAC hut management partnerships with DOC 	<ul style="list-style-type: none"> Reporting shows increasing usage and high member and user satisfaction. Partnership reporting notes value of long term NZAC-DOC relationship.

5. Develop climber skills and enhance their safety		
5.1 We provide a national, standard framework for all NZAC climbing activities.	<ul style="list-style-type: none"> Develop and implement standard framework for all NZAC instruction Develop and implement a standard framework for all NZAC trips and events Develop and implement a national, standard incident register as a learning tool. 	<ul style="list-style-type: none"> Standard frameworks for instruction, trips, events and incident reporting implemented and used consistently by all Sections
5.2 We provide opportunities for individual climbers at several levels to develop their skills and add experience	<ul style="list-style-type: none"> Climbing pathway development material created and made available to support individual climbers with their personal climbing growth and safety. A range of courses to develop climber skills and experience are organised and delivered by NZAC each year. 	<ul style="list-style-type: none"> Material available and publicised. Annual reports show numbers of NZAC members gaining skill and experience via participation in NZAC courses and trips.

Kawarau/Remarkables Conservation Areas reclassification consultation Submission Form

Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

I wish to keep my contact details confidential - **YES**

1. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Recreational Values Report 6. Public access points (page 11)
Recreational Values Report 8.8 Ice and rock climbing (page 19)
Recreational Values Report 8.9 Ski touring and mountaineering (page 21)
Recreational Values Report 9. Commercial Recreation (page 25)

My submission is (include the reasons for your views)

Recreational Values Report

6. Public access points

Helicopter access from Frankton to the Wye creek ice climbing area is a well established public access point. Other helicopter access points to the area should also be considered.

Recreational Values Report

8.8 Ice and rock climbing (page 19)

The Kawarau/Remarkables is an important, year round recreational mountaineering area for New Zealand. The access to the alpine zone provided by the ski field road provides a unique feature that allows day and shorter duration of trips compared to the more remote high alpine areas of the Southern Alps.

The NZMGA confirms the area's recreational value for trekking, mountaineering, rock climbing during summer and ice and mixed climbing during winter for all levels of skill and experience.

Recreational Values Report

8.9 Ski touring and mountaineering (page 21)

During winter, the unique feature of the road provides easy access for day trips and short duration ski touring trips above the snowline. The terrain of the area caters for all levels of skills and abilities. The ease of access and proximity of the ski field can however provide a false sense of security with regards to the seriousness of some areas of the terrain, particularly with respect to the avalanche danger.

Recreational Values Report

9. Commercial Recreation (page 25)

The Kawarau/Remarkables Conservation is an important resource for the mountain guiding industry of the South Island. The ease of access and location east of the divide provides opportunities for activities when other mountaineering regions of the Southern Alps are affected by weather.

The reported numbers of concession visitor numbers do not accurately present the variety of activities provided by mountain guiding concessionaires in the area. Activities include guided trekking, snowshoeing, mountaineering, rock climbing ice and mixed climbing ski and snowboarding touring and ski mountaineering. The venue also provides an important educational resource for instruction in the above activities at all levels as well as in avalanche safety and the training and assessment of future mountain guides and outdoor instructors.

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

Printed name of submitter or person authorised to sign on behalf of submitter

_____25/02/21_____

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Blair Horrell
Organisation (if applicable):	Alluvium Ltd
Role (if applicable):	Director
Email:	[REDACTED]
Phone:	
Address:	[REDACTED] [REDACTED] [REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Please refer to attachment

My submission is (include the reasons for your views)

Please refer to attachment

What further information sources should we consider in this reclassification?

Please refer to attached information.



Department of
Conservation
Te Papa Atawhai

DOC - 6514452

New Zealand Government

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

A black rectangular box redacting the signature of the submitter.

Printed name of submitter or person authorised to sign on behalf of submitter

Kate McKenzie

Date 26/02/2021

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

IN THE MATTER

of the Kowarau/Remarkables Conservation Area reclassification consultation

Submission on behalf of Alluvium Ltd

26 February 2021

Kate McKenzie
Tai Poutini Resources Ltd

1. Tai Poutini Resources Ltd has prepared this submission to the Department of Conservation (the Department) on behalf of Alluvium Ltd. Alluvium Ltd is a research and development company established for the regenerative extraction of resource elements for the support of the renewable energy and “clean tech” industry with interests in a number of mineral permits on the Nevis Valley floor.
2. Alluvium Ltd has recently acquired a significant shareholding in Minerals Permit 41734 (previously held by Paradise Mining Ltd) which covers Schoolhouse Flat, and is partly within the Kawarau/Remarkables Conservation Area. Alluvium Ltd has also made an application for a Minerals Prospecting Permit covering a large part of the Nevis Valley. Alluvium Ltd’s submission on the reclassification of the Kawarau/Remarkables Conservation Area relates to the area covered by MP 41734 and any areas covered by the application for a Minerals Prospecting Permit.
3. Resource consents exist from Otago Regional Council for a portion of the Minerals Permit adjacent to Schoolhouse Creek. The Department gave written approval to the ORC application in 2018, and has previously granted an access arrangement to facilitate operations on this part of MP41734. Alluvium Ltd has recently lodged an application with the Department to establish an access arrangement to allow the consented operation to continue, along with an extended area.

Ecological values

4. The ecological report prepared for the reclassification exercise states:

“The floor of Te Papapuni/Nevis River has been modified through pastoral use (formerly having been part of Ben Nevis and Glen Nevis Pastoral Leases) and by gold mining (Fig 6).”¹

5. The report also states:

“Te Papapuni/Nevis River is an intermontane basin and so is of ecological importance. School House Flat supports a range of communities of importance including dryland terraces, wetlands, red tussock and fan ecosystems. These communities support numerous threatened and rare plants. This is the only habitat for these species within the Remarkables Conservation Area.”²

6. The report does not make mention of the consented operation or granted mineral rights at page 21 where existing and potential modifications are listed, despite part of the operation being within the Kawarau/Remarkables Conservation Area.
7. An ecological assessment was carried out by the company who originally sought resource consent for mineral operations in MP41734. This assessment (a copy enclosed as Attachment 1) evaluates a large

¹ Brian Rance and Nixie Boddy – “Kawarau/Remarkables Conservation Area ecological values”, 2020, p.11

² Ibid. P. 13

portion of Schoolhouse Flat and concluded that mining could occur “with minimal effect on the long term ecological values of this area provided the suggested biological areas are retained with suitable buffer zones and drainage”.

8. As part of Alluvium Ltd’s current application to the Department for an access arrangement, the company is in the process of obtaining an updated ecological assessment in support of its application. This will be supplied to the Department when it is finalised.
9. Alluvium Ltd considers that well-managed progressive rehabilitation of the site following mining activities would give opportunity to improve the indigenous biodiversity of the area, by reducing the dominance of exotic pasture and pests and re-introducing native species.
10. Alluvium Ltd is concerned that the ecological assessment undertaken for the first stage of the reclassification consultation is broad and contains sweeping statements about the ecological value of the entire Schoolhouse Flat as well as the Nevis Valley floor more generally. The reality is that the environment is highly modified by recent and historical mining and pastoral activities, within which Alluvium Ltd’s assessment identifies only small and discrete areas of vegetation worthy of protection amidst an area dominated by exotic species.

Heritage values

11. The historic heritage report prepared for the reclassification consultation notes a number of sites of interest in the vicinity of Schoolhouse Creek, and also notes that a number of these have been disturbed or are no longer able to be found due to the subsequent comprehensive pre-1950s mining of the area.
12. An archaeological report was undertaken in 2010 for the consented mining operation, and is enclosed as Attachment 2. This report notes that:

“The development history of the Lower Nevis has always been one of modern mining techniques replacing old ones and adding their own distinctive marks on the landscape. So future mining development is not an anathema to this undoubtedly important historical landscape.”³

13. As part of Alluvium Ltd’s current application to the Department for an access arrangement, the company is in the process of compiling an updated archaeological assessment in support of its application. This will be supplied to the Department when it is finalised.
14. Alluvium Ltd considers that the high-level historic heritage report commissioned by the Department is lacking sufficient detail to warrant any heritage classification being applied to the Schoolhouse Flat area.

³ Andrew Winter, “Schoolhouse Creek – Lower Nevis Valley”, 2010, p. 14

Landscape

15. The landscape and visual assessment commissioned by the Department for the reclassification states the following:

“The outwash fan of Schoolhouse Flat (within the CA) is a unique feature of the Lower Nevis Valley. It has been described in the Ben Nevis Conservation Resources Report as:

'the large alluvial outwash fan at Schoolhouse Flat which is a dominant geomorphic feature as it is an extensive outwash fan of some 4km in lateral extent'.

The Schoolhouse Creek outwash flats merges with the Nevis River floodplain. The floodplain contains a number of natural cut off meanders or oxbows together with dredge ponds and piles of tailings left from the gold mining area.

...

As with the Upper Nevis, gold mining and pastoralism have left a lasting imprint to the present character of the lower slopes and valley floor of the entire Nevis Valley.”⁴

16. As mentioned in the archaeological report commissioned for the consented operation, the Nevis area has been periodically mined, both historically and more recently, using a variety of techniques. Mining has therefore been part of the landscape for over a century, and has modified the landscape over time.
17. Alluvium Ltd’s operation in any given area will be of short duration, with visual effects managed during operations as part of resource consents granted by the Central Otago District Council. Progressive rehabilitation will see the original alluvial fan landform of Schoolhouse Flat and any other disturbed areas restored, and as noted above give opportunity to achieve greater indigenous biodiversity outcomes than currently exist due to the dominance of exotic weeds and pasture species.

Mineral potential

18. Alluvium Ltd has applied for a Prospecting Permit in the Nevis Valley to investigate the likely presence of Rare Earth Elements in the known alluvial gold deposits in the area, and is working on a collaboration with the New Zealand Institute for Minerals to Materials Research. Rare Earth Elements are recognised by the Minerals and Petroleum Resource Strategy for Aotearoa New Zealand: 2019-2029 as being “clean-tech” minerals which are essential for building low emissions technologies, assisting New Zealand’s transition to a low emissions economy.

⁴ Blakely Wallace Associates “KAWARAU REMARKABLES CONSERVATION AREA Landscape and Visual Assessment”, 2020, p. 12

19. Alluvium Ltd recognises the historic and landscape values of the Nevis valley, however is concerned that a restrictive conservation classification in the area may preclude the extraction of these minerals which the New Zealand Government has recognised as being part of the country's journey toward a sustainable economy.

Economic Potential

20. Minerals exploration demonstrates a significant gold resource exists within MP 41734. The realisation of this resource has the potential to generate significant employment directly and indirectly within the community over the next decade, and significant expenditure has already been distributed to the local and wider economy developing this resource opportunity. With the current economic uncertainty associated with the COVID-19 pandemic, especially in a region impacted significantly by a decline in international tourism, the ability to provide for the economic wellbeing of Central Otago residents through the creation of jobs is vital.
21. Alluvium Ltd requests that the Department take into consideration the significant economic benefits to the local and national economy associated with the rich resources within the mineral permit areas, the opportunity to regenerate a highly modified landscape and improve indigenous biodiversity when determining an appropriate classification for the land. The consented and future operations provide an opportunity to extract resource elements (Rare Earth Elements) to support a clean tech industry as part of New Zealand's transition to a low emissions economy.

Conclusion

22. Alluvium Ltd requests that when reconsidering the classification of the area covered by MP 41734 and the Prospecting Permit application area the Department takes into consideration the more comprehensive ecological and archaeological assessments undertaken for Schoolhouse Flat in 2010, and notes the significant historic and more recent pastoral and mining activities which have resulted in a highly modified environment. Rehabilitation carried out by the company following the recovery of any given target resource could also result in improved indigenous biodiversity outcomes for Schoolhouse Flat.
23. Alluvium Ltd requests that the conservation status for the area covered by MP41734 and the Prospecting Permit remains unchanged, or that a conservation status is applied that recognises the significant mineral resources which exist below the surface and does not preclude the realisation of any mineral resource which could contribute to a low emissions economy for New Zealand.

Kate McKenzie

Principal Planner – Tai Poutini Resources Ltd

On behalf of Alluvium Ltd

**Report on the Ecological Values of part of the
Schoolhouse Flats, Nevis Valley
for
Golden Bush Mining Ltd**



Schoolhouse Flats, Nevis Valley view east

March 2010

Conservation Consultancy Limited
P O Box 478
QUEENSTOWN

N C Simpson, Botanist
email: n.simpson@xtra.co.nz
Phone/fax: 03 4422035

Report on the Ecological Values of part of the Schoolhouse Flats, Nevis Valley for Golden Bush Mining Ltd

Introduction

Golden Bush Mining Ltd has applied to prospect and mine an area of the Schoolhouse Flat in the lower Nevis Valley. Although his mining license covers a large part of School House Flat above and below the Nevis Road, the company proposes to prospect less than 50% of the license areas and only mine those areas where gold is discovered during the prospecting. (Refer attached map). Earlier drilling sites have indicated the presence of gold under parts of the Schoolhouse fan and along the Schoolhouse Creek. Of particular interest is that part of Schoolhouse Creek and Schoolhouse fan that overlies the line of the Nevis Fault (Beanland 1988). It is not intended to mine the old tailings along Schoolhouse Creek.

An inspection and botanical survey of the proposed mining sites was made on 15 March 2010 accompanied by Mark Skinner and assisted by Barbara Simpson. Two people spent approximately six hours surveying most of the proposed prospecting site. The area proposed to be prospected and mined and the surveyed areas are shown on the attached map

Topography

Schoolhouse Flat is a broad, gently sloping, more or less triangular-shaped fan formed by Schoolhouse Creek which now runs down the northern edge of the fan. Two old water races also wander across the flats as well as another small, unnamed stream further south and near the Nevis cemetery. The Schoolhouse Creek flows over a gravelly bed a metre or two lower than the flats on its true right while on the true left or north, it is contained by a higher alluvial terrace. The Nevis road cuts across the lower part of Schoolhouse flats and the Nevis River further east cuts across the toe of the flats.

Vegetation

The largest part of Schoolhouse Flat to the west of the Nevis Road is dominated by grey mats of mouse ear hawkweed (*Hieracium pilosella*) with brown top (*Agrostis capillaris*) often co-dominant. Sweet vernal (*Anthoxanthum odoratum*) and the native grassland mat plant *Raoulia subsericea* are common with native Daphne (*Pimelea oreophila*), harebell (*Wahlenbergia albomarginata*) and patches of creeping Coprosma (*Coprosma petriei*) and dwarf patotara (*Leucopogon muscosa*). Hard tussock (*Festuca novae-zelandiae*) and tufts of the dryland sedge (*Carex muelleri*) are scattered across parts of the flats. Other plants present include *Muehlenbeckia axillaris*, *Carex colensoi*, *Carex breviculmis*, *Anisotome flexuosus*, *Prasophyllum oligantha*, white clover (*Trifolium repens*) and sheep's sorrel (*Rumex acetosella*). Taller shrubs of matagouri (*Discaria toumatou*), native broom (*Carmichaelia*), porcupine shrub (*Melicactus alpinus*) and sweet brier (*Rosa rubiginosa*) grow in a few places but are sparse. (Refer photo 1).

probably photo

Patches of copper or red tussock (*Chionochloa rubra* subsp. *cuprea*) grow along parts of the base of the hill slopes that form the western boundary of the flats (photos 2,13). The inter-tussock spaces of the smaller patches are mainly occupied by exotic grasses, particularly brown top but the larger central area that extends back into the hill slopes (photo 2) has a primarily native understorey with sphagnum moss and a range of native herbs, sedges and rushes as well as scattered bog tree daisy (*Olearia bullata*). Young rowan (*Sorbus aucuparia*) are spreading into this red tussock wetland.

Parts of the bed and river flats of Schoolhouse Creek have been mined in recent times and much older tailings occur along the true right terrace edge in one area. Interesting shrubland now grows on parts of the terrace risers particularly on the true right. Matagouri dominates with porcupine shrub, sweet brier, wild gooseberry (*Ribes uva-crispa*), *Coprosma dumosa*, native broom, *Gaultheria nubicola*, *Muehlenbeckia complexa* and *Coprosma intertexta*, the latter a plant on the Threatened and uncommon plants of New Zealand list. (Refer photos 6, 12 – 15)

A small area of red tussock occurs in one damp area with scattered tussocks nearby. Exotic grasses form the inter-tussock cover (photo 15)

A few small wetlands, water filled mining holes and stream backwaters contain a range of native and exotic plants including *Potamogeton cheesemanii*, *Myriophyllum triphyllum*, *Elaeocharis acuta*, *Glyceria declinata*, *Mimulus moschatus*, *Isolepis caligenis*, *Isolepis aucklandica*, *Juncus articulatus*, *Juncus acuminatus*, *Juncus effusus*, *Carex gaudichaudiana*, *Carex ovatus*, *Pratia angulata* and *Gunnera monoica*. Other riverbed plants include *Acaena inermis*, *Poa cita*, *Rytidosperma pumila*, *Holcus lanatus*, *Gnaphalium traversii*, *Gnaphalium laterale*, *Raoulia tenuicaulis*, *Carex buehnerianii*, *Ranunculus multiscapus*, *Lagenifera petiolata* and self heal (*Prunella vulgaris*). A small patch of *Euchiton* (*Gnaphalium*) *paludosus*, a tiny green cudweed that is on the Threatened and uncommon plant list, was found near the stream on a low, damp bank.

Two old water races flow across the flats (photo 7) forming a narrow, green ribbon in the dry landscape of the flats. The edges were cropped to form a tight turf with *Carex coriacea*, *Juncus effusus* and *Carex diandra* rising above. The turf plants were similar to those already described in the wetlands with *Ranunculus foliosus*, *Stellaria alsine*, *Myosotis laxa* and *Hydrocotyle novae-zealandiae*.

Small patches of copper tussock occur near the cemetery at the south end of the flats and south again another small stream has a predominantly exotic vegetation with scattered copper tussock along the edge, silver tussock (*Poa cita*), *Bulbinella angustifolia* and scattered broom (*Cytisus scoparius*) bushes (photos 8 & 9).

Threatened Plants

The Threatened and uncommon plants of New Zealand (de Lange et al. 2009) lists these indigenous plants in a number of categories that reflects their conservation status as presently known. Six main categories are listed plus a number of sub categories within the main headings. Both the species mentioned above are listed as **At Risk**.

Coprosma intertexta is a wiry, narrow-leaved shrub and is in sub category **3. Relict** that reflects its disappearance and past decline from many of the sites in which it would have been found and from communities that have disappeared or only exist as relicts. I have not recorded this shrub from the Nevis Valley before and this may be a new record. GPS 1282667 4985751 and 1281394 4986041 NZTopo50-CC12 Bannockburn

Euchiton paludosus is a tiny, mat-forming herb of damp ground. It is classified in the sub category **4. Naturally uncommon**. These are plants that are confined to specific habitats, substrates or geographical areas or occur within naturally small and widely scattered populations. GPS 1281856 4985981 NZTopo50-CC12

Other Ecological Values

The copper tussock patches are important as although most of the inter-tussock species are exotic, the rare and threatened indigenous buttercup, *Ranunculus ternatifolius* has been found in the Nevis valley in damp copper tussock areas in the shelter of the tussock. No buttercup was found in the copper tussock areas searched during this survey. The main copper tussock areas are along the edge of the proposed prospecting area or outside it.

recorded from
2 sites within
area to be
mined on
bannockburn

There are few remaining tree daisies in the area so it is important to retain these where possible. They are known to be important invertebrate habitats. GPS 1281460 4986071

Effect of the proposed prospecting/mining on the existing ecological values

The vegetation of Schoolhouse Flat is dominated by exotic species but with native species such as hard tussock and dryland sedge scattered over it. Mining will affect this community temporarily but once completed and the ground returned to its original shape then the previous plant communities can be expected to return to their present state or similar.

also on mine
flats - a daisy
after mining

It is recommended that the existing copper tussock patches be left intact and that their drainage if affected by nearby mining, be re-instated. If this occurs then prospecting and mining should have no long-term effect on their continuing existence.

drainage along
to drainage
flats -
also grassy
but not drainage
can be re-instated

As with Schoolhouse Flat the Schoolhouse Creek bed and river flats will in time return to something like their present state as floods reshape the ground and plants re-colonise the disturbed areas. It would be an advantage to leave the ground rough rather than smoothing it out after mining as this will provide more varied habitat for plants and promote greater diversity. In time the river is likely to re-shape the river flats as floods occur and more material deposited.

may be an
exotic after mining
Nahres will
re-colonise
area after mining

Areas of shrubland on the terrace riser where the *Coprosma intertexta* is found (two sites) and the area identified with the tree daisies (*Olearia* species) should be left intact. The tree daisies are on the true left which is probably outside the mining area. In particular the *Euchiton paludosus* site should be identified, clearly marked or preferably ringed with tape and retained with a buffer of several meters around it. It is probably within the 5 m strip along the creek that is to be excluded from the mining but because of its small size and area occupied it could be inadvertently destroyed if mining was to occur nearby.

It should be possible to retain and to work around the copper tussock patch on the river flat. GPS 1282599 4985791 NZTopo50. A buffer of four to five meters should be sufficient to protect this. It is suggested that the copper tussocks scattered down stream from the main patch be collected and planted on the downstream side of the main patch to enlarge this patch and provide a more sustainable habitat for the tussock. It will be important to ensure that the site does not dry out due to any mining activity and that the original drainage is replaced if necessary. Although the copper tussock grows on dry hill slopes it prefers damper sites.

Conclusion

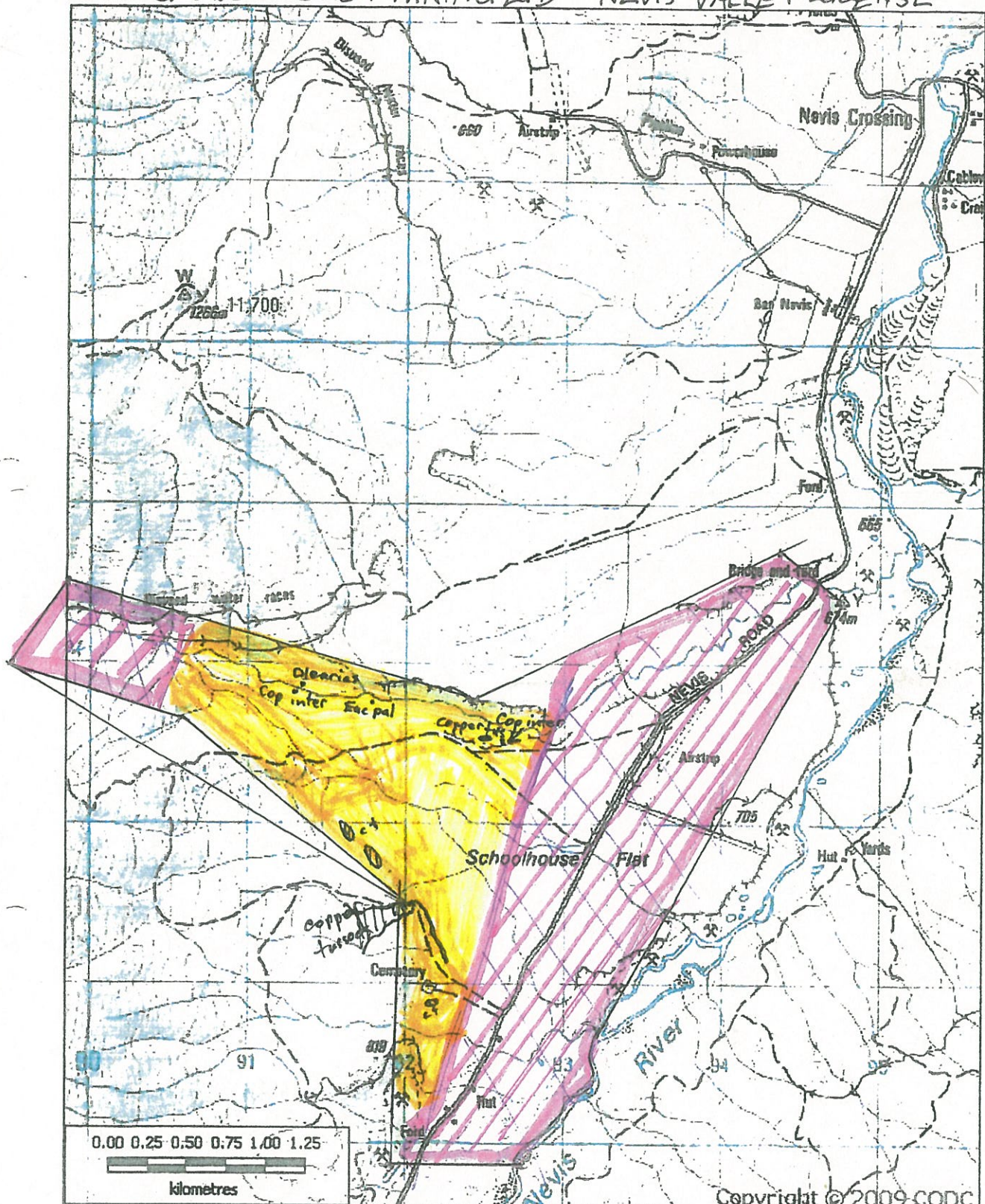
The proposed prospecting could be carried out over much of the site with minimal effect on the long term ecological values of this area provided the suggested special biological areas are retained with suitable buffer zones and drainage.

References

- Beanland, S.; Barrow-Hulbert, S.A. 1988: The Nevis-Cardrona Fault System, Central Otago, New Zealand: Late Quaternary Tectonics and structural development. *New Zealand Journal of Geology and Geophysics* 31: 337-352.
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Also notes with fish in rice field area about 1/2 km. As well as landraps etc.
The site of the cold sequestered Nevis is at the base of the mountain, approx. 1/2 km from the river.



GOLDEN BUSH MINING LTD - NEVIS VALLEY LICENSE

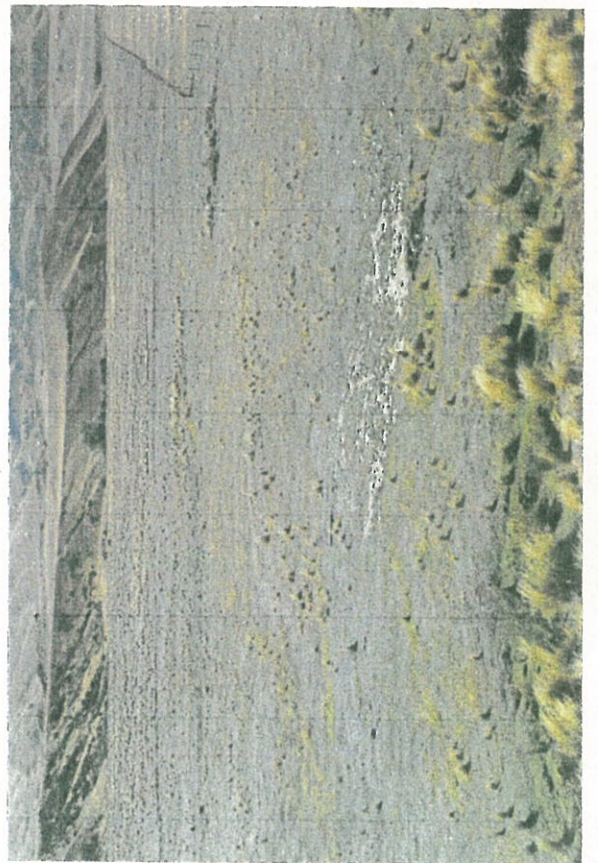


Scale: 1:34,070 @ A4 | Coordinates: New Zealand Transverse Mercator (NZGD2000)
Printed: Thursday, 7 May 2009 by fjs



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The Central Otago District Council accepts no responsibility for incomplete or inaccurate information.

KEY
 Area surveyed
 Area of license not to be prospected/mined



much of the western terrace may be lost
 after mining causes actually instead

Photo 1. Schoolhouse Flat, view north-east. Schoolhouse Creek runs along the terrace edge at back.

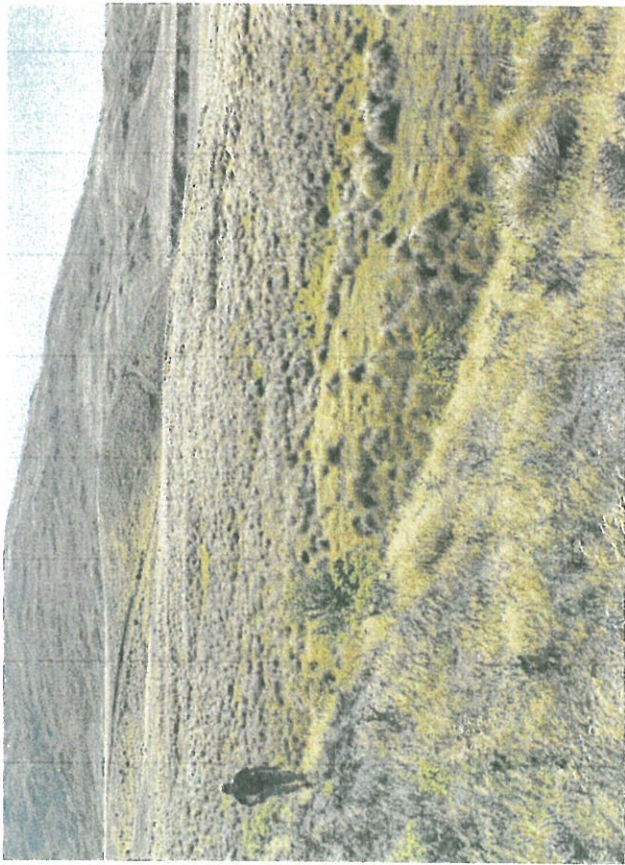


Photo 2. Red tussockland along the upper edge of Schoolhouse Flat, view north.



Photo 2a. Adjoins photo 2. Red tussock and dryland grassland towards the south end of the flats.



Photo 3. Small red tussock wetland beside Schoolhouse Creek. Creek to the right.

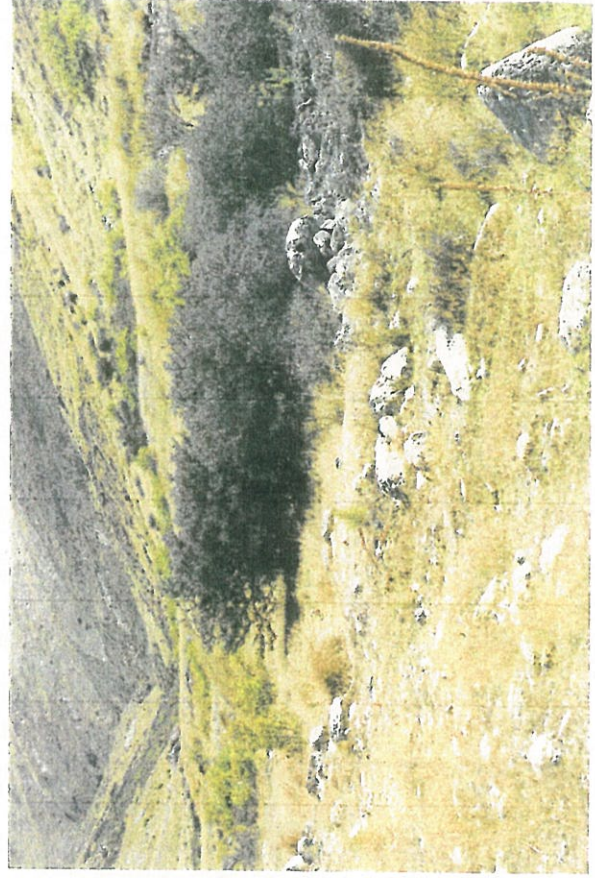


Photo 4. Matagouri and Olearia shrubland on true left of Schoolhouse Creek.



Photo 6. *Coprosma intertexta* on the small terrace riser true left of Schoolhouse Creek



Photo 7. Old tailrace crossing Schoolhouse Flat, view up (westwards).

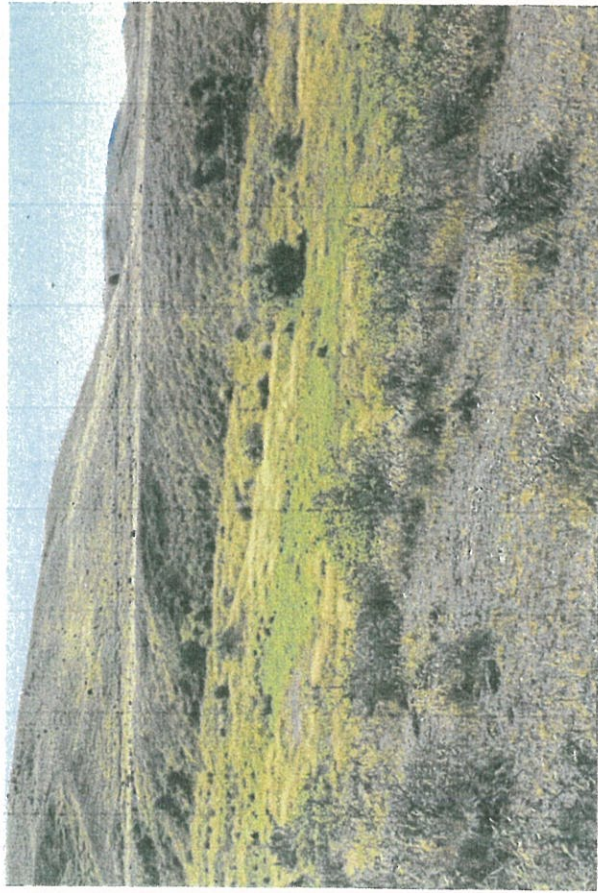


Photo 8. Small stream south of the cemetery view north.



Photo 9. View up small stream from the valley floor.

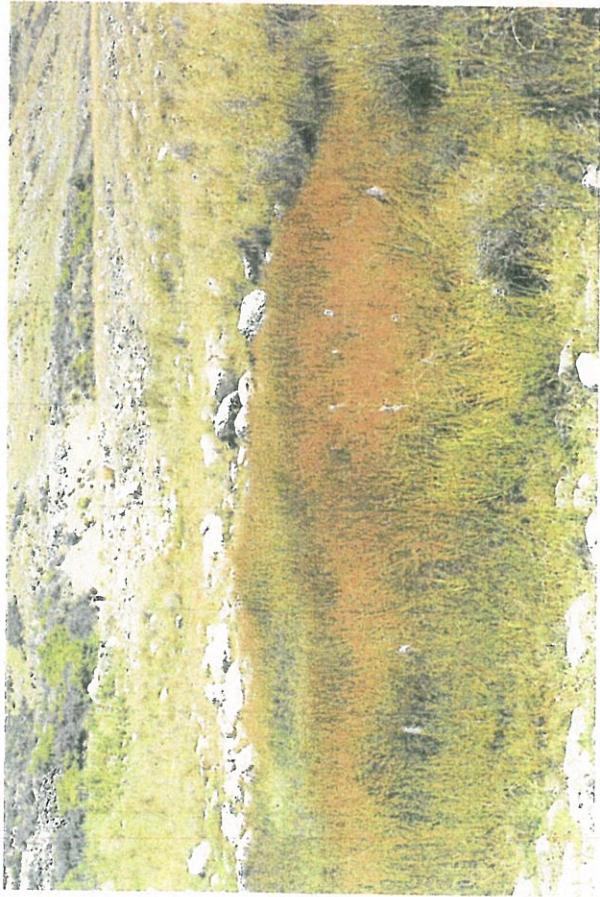


Photo 10. Small wetland formed in old diggings, Schoolhouse Creek with *Elaeocharis acuta*.



Photo 11. Upper middle edge of Schoolhouse Flats showing dryland vegetation.



Photo 12. View up Schoolhouse Creek from bottom of proposed area to be mined.



Photo 13. View down (eastwards) Schoolhouse Creek. Creek at left, Flats to right.

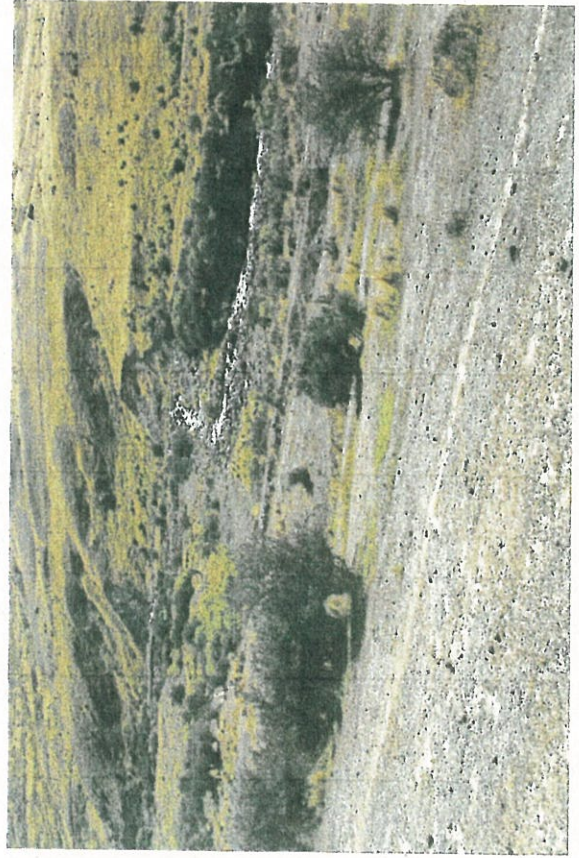


Photo 14. Upper Schoolhouse Creek where the fault trace crosses the creek, upper left.

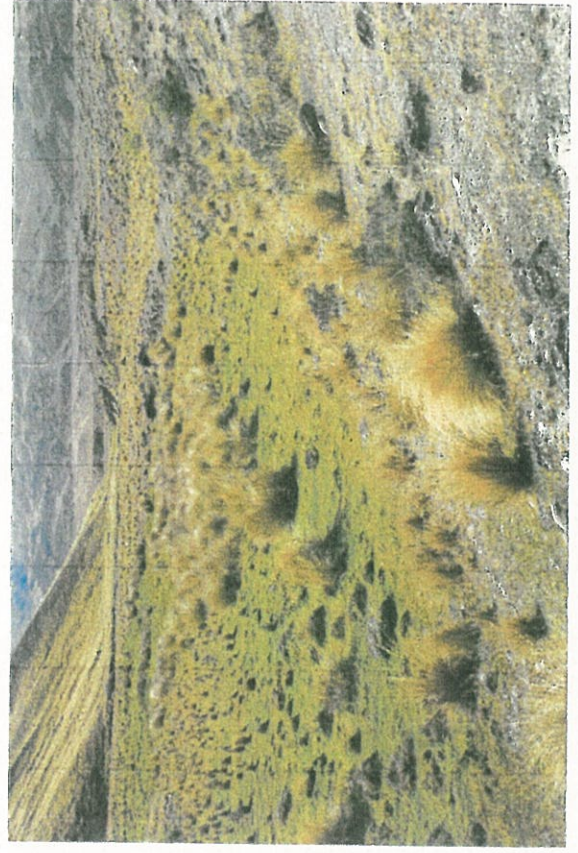


Photo 15. Red tussock patch near the upper edge of the flats. View southwest.

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of Report.

Schoolhouse Creek,
Lower Nevis Valley

All except E



Archaeological Assessment – September 2010

amp winter for

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Schoolhouse Creek – Lower Nevis Valley, Pt Run 345A Archaeological Assessment

Introduction

The area to be assessed is pt Run 345A, Nevis Survey District and comprises of the land surrounding the lower part of Schoolhouse Creek, which flows from the mountains to the Nevis River. Parts of this land have previously been associated with 19th c. mining activity. The land could therefore fall under the definition of an archaeological site as provided by the Historic Places Act 1993, being "A place in New Zealand that [...] was associated with human activity that occurred before 1900." All pre-1900 archaeological sites (whether recorded or unrecorded) are protected under the Historic Places Act and an authority from the Trust is required before any work can be undertaken on such sites.

Background

The site is leased by the Pioneer Generation Limited. The Golden Bush Mining Company has a permit to mine parts of this land for gold. The purpose of this assessment is to ascertain the extent and significance of surviving archaeological/heritage values of the site.

The land has two designations in the CODC District Plan:

- 'Midden/Ovens' (map 68, no. 275) also listed by the NZHPT (no. 5615, cat. II)
- 'Schoolhouse Flat Wetland' (SN. 48) *not even in permit*

The land also forms part of a recent 'Historic Area' designation by the NZHPT (no. 7800)

The legal description is pt Run 345A, Blocks I & III, Nevis Survey District, under Certificate of Title OTA2/1215. The permit, held by the Golden Bush Mining Company, is Mining Permit 41 – 734. The current legal title, and a diagram of the area covered by the current mining permit, can be seen in Appendix B.

NB. The mining permit covers a large area, from the western bank of the Nevis river right up Schoolhouse Creek for a distance of maybe 5km, as well as covering most of the flat to the south and onto the valley terraces north and south. The area proposed for mining along the banks of Schoolhouse Creek and the flats to the south, covers a much smaller area (See figure 2 of Appendix D). Although the histories in this report range over a wide area, encompassing much of the Lower Nevis and, more particularly, the Schoolhouse Flats area. The archaeological

interpretations and conclusions are based on the area proposed for current mining development.



Statutory Requirements

As noted in the 'Introduction' above, the relevant legislation which affects this proposal is the Historic Places Act 1993 since the site *"was associated with human activity that occurred before 1900"* and it *"may be able through archaeological methods to provide evidence relating to the history of New Zealand"* (HPA 1993).

After submission to the NZHPT, archaeological assessments can take up to 3 months to process. Once an archaeological authority has been granted, there is a statutory 15 day stand-down before any works on site can commence.

Methodology

Research was primarily based on the district's mining survey plans, provided by LINZ, with additional material provided by newspaper archives "Papers Past" held by the National Library of New Zealand. A site visit was carried out and measurements and photographs taken.

I am indebted to Jill Hamel, for her exceptionally well researched and written "*The Cold, Sequestered Nevis*", as well as the thorough and, again, well researched Registration document by the NZHPT .

Physical Environment and Setting

The Nevis Valley is made remote by its mountainous borders, with the Carrick Range to the east and the Remarkables/Hectors to the west. It runs roughly northeast/southwest, eventually flowing into the Kawarau between Gibbston and Bannockburn. Schoolhouse Creek flows into the Nevis River from the west, in a part of the valley known as the Lower Nevis. Its flow has created an extensive flats area to the west of the Nevis.

Previous Archaeological Work

There are some archaeological records, listed by the New Zealand Archaeological Association (NZAA), regarding this area:

- F42/5 – a Maori ‘working floor’, with flint-chippings and crop-stones, recorded in 1917 by Mr Philip George.
- F42/180 – a complex of stone structures, recorded by Angel Middleton in 2005
- F42/182 – two pieces of sluicing pipe abandoned on the roadside, recorded by Angel Middleton in 2005
- F42/186 – Johnston’s workings, recorded by Angel Middleton in 2005
- F42/287 – possibly Adie’s workings, recorded by Jill Hamel.

The detailed records of these sites can be seen in Appendix F.

Historical Setting – The Nevis Valley, from Maori to Miners

Human use of the Nevis valley goes back to a time when the Maori hunted Moa in the area in about the 14th c.¹ Their name for the river was Te Papapuni and the indications are that the Moa were butchered in the vicinity of Schoolhouse Creek.² The first European to see the valley was the pastoralist Nathanael Chalmers, led by Reko in 1853³; before the end of the decade, the land was divided into the area’s first pastoral runs: the Kawarau, Hawksburn and Lorn Peak Runs (See picture i, Appendix C).

The discovery of gold on the western watershed of the Carricks, by ‘a party of three miners’⁴ in October 1862 led to a rush to all parts of the area, including the Nevis by that November.⁵ Within a year the miners were moving on from paddocking and cradling and were beginning to avail themselves of a system of hydraulics to work their claims which largely increased their dividends.⁶ The quality of gold was described as ‘much water worn and nuggetty, the greater portion consisting of pieces of between two to fourteen pennyweights.’⁷ The check in the development of sluicing being the difficulty in getting pipes over Duffers Saddle.⁸

The first Nevis township was situated on the eastern bank of Commissioners Creek, with the terraces on the opposite side of the gorge worked for gold. This township grew to provide services for some 1500 miners, although the difficulty of transporting building materials meant that buildings tended to be small or made of canvas.⁹ Ownership of the land for homesteads and businesses was only formalised under

¹ Hamel, Jill (1994) *The Cold, Sequestered Nevis*, report to the Department of Conservation on the historic values of pastoral leases in the Central Otago high country. – page 5

² *The Lower Nevis Historic Area* – Registration Report by the NZHPT, registered June 2010

³ *Ibid.*

⁴ AJHR, 1863 Session I, D-06

⁵ *Otago Witness*, 28th November 1862, page 3

⁶ *Otago Witness*, Issue 670, 1 October 1864, Page 13

⁷ *Ibid.*

⁸ Hamel (1994), page 8

⁹ NZHPT Registration Report, pages 8 & 9

the Certificate of Title system some 20 years after the Nevis was first settled; in the meantime the residents had to live under the more precarious goldfields licensing system.¹⁰ The harsh winters in the mountains made digging all but impossible for a large part of the year, when ice and frost clogged and split the races; however with 'plenty of lignite, with snug cabins, hot whisky, and contented minds' some miners, at least, were able to look upon the winter with 'more pleasure than dread.'¹¹

Chinese miners were a regular fixture of the Otago Gold rushes of the 1860s. Their presence was often met with hostility by Europeans. It was well known that 'the Chinese deal exclusively with their own countrymen for stores, etc' and it was cautioned that it would be best to wait until the full extent of the natural resources of the province were known before they were given up to 'a people who are notoriously, almost without exception, bad men and bad citizens.'¹² Towards the end of the 1860s and into the 1870s, however, this hostility seemed to be turning to grudging admiration for 'John Chinaman [who] comes and delves among the ruins and finds payable gold where other people have been working before and probably fancied that they had taken it all away.'¹³ Indeed, some of the earlier gold rush communities seemed to miss the Chinese population when they moved on.¹⁴

In the early decades of settlement in the Nevis Valley, the Chinese population of miners would sometimes outnumber the European; for example, in 1877 the AJHR lists a total of 280 miners in the Nevis goldfields, with only 80 of them European.¹⁵ Their distinctive dwellings would have been easily identifiable in the landscape (see picture iv, Appendix C). However, by the end of the 1880s, the Chinese population of the Nevis had dropped to below 25.¹⁶

Mining techniques, populations and successes on the Nevis mirrored the rest of the Otago goldfields to a great extent. The prosperity of the region lasted through the 1870s; with totals of 5000 oz being taken out in the 1874/75 season.¹⁷ However, economic decline and the lack of technological advances meant that the remaining gold, which was plentiful, was nevertheless getting harder to get hold of. This decline saw the amount of miners recorded in the Appendices of the Journal of the House of Representatives over the country as a whole decreased by some 4000 people

¹⁰ Hamel (1994), page 8

¹¹ *Otago Daily Times*, Issue 1084, 10 June 1865, Page 4

¹² *Otago Daily Times*, Issue 1039, 19 April 1865, Page 6

¹³ *Otago Daily Times*, Issue 2646, 30 July 1870, Page 6

¹⁴ "The departure of the Chinese for the Arrow and other districts has also helped to make matters more than usually dull at Alexandra this winter." *Otago Daily Times*, Issue 2621, 1 July 1870, Page 2

¹⁵ AJHR, 1877 Session I, H-01

¹⁶ NZHPT Registration Report, page 12

¹⁷ Hamel (1994), page 9

between 1874 and the end of the decade.¹⁸ The total production of gold, fell from a peak of some 530,000oz in 1866 to around 190,000oz by 1890.¹⁹

The dredging boom of the late 1880s through to the first decade of the 20th century saw much new work in the Nevis Valley and a slight resurgence of fortunes; especially when coupled with the new technique of hydraulic elevating. Picture ii of Appendix C is a detail from SO 1255, a topological survey of the Nevis region, with some surface features marked. The activity is centred around the Lower Nevis township to the south and the Nevis Bridge settlement to the north. The Lower Nevis Township was where, in later times, the hydraulic elevation claims were concentrated on the river terraces to the west, below Schoolhouse Creek (Stewarts Creek on SO 1255). By 1892 a group, including a Mr Adie, was one of several groups elevating sluiced material on a large scale.²⁰ An example of the sort of equipment used in this process can be seen in picture v of Appendix C.

The early successes of concerns such as Sew Hoy's on the Shotover led to nearly every dredgable river in Otago being surveyed and marked off for dredging claims by 1889.²¹ The local availability of coal for dredging machinery helped to encourage miners to shift the considerably weighty dredges over the mountains to the Nevis to get to work on the river. Picture iii of Appendix C gives an indication of the amount of river claims that existed on the Nevis by the end of the 19th century.

The opening decade of the 20th century saw a stark decline in mining in the Nevis Valley, a process mirrored over the rest of the region and country, although it seems that many die-hard members of the Nevis mining community continued on a small scale. Jill Hamel mentions the Adies and the McLeans in this context, with a probable second generation cropping up in records from the 1920s.²² Dredging had declined over the First World War, although a single dredge, operated by Sydney Charles Fache, operated into the 1940s.²³

The depression of the 1930s saw the resurgence of mining throughout New Zealand, though not on the same scale as the 19th century rushes, with a lot of the work heavily subsidised by the government. Long-standing Nevis families were joined by men living in a government camp for unemployed men.²⁴ These unemployed men most often worked over old ground in small parties.²⁵ Mining continued on a relatively small scale into the 1950s, though by the end of this decade the town had declined

¹⁸ AJHR, 1874 Session I, H-09 & Appendix AJHR, 1879 Session II, H-11

¹⁹ Henry. A. Gordon (1894) *Mining and Engineering and Miners' Guide*, Samuel Costall, Government Printer, Wellington. Pages 7 & 8

²⁰ NZHPT Registration Report, page 13

²¹ *Tuapeka Times*, Volume XXII, Issue 1613, 10 August 1889, Page 2

²² Hamel (1994), page 11

²³ NZHPT Registration Report, page 15

²⁴ Hamel (1994), page 11

²⁵ NZHPT Registration Report, page 17

steadily. The remaining inhabitants dwindled from this time to those who lived and worked on the two sheep stations.²⁶

The late 20th c. and the first decade of the 21st has seen the debate on the future of the Nevis Valley grow in intensity; from the question as to whether the area is suitable for hydro-electric damming and the renewed interest in the extraction of gold. Gold has been mined here over the past decade. This modern mining, mostly limited to the Schoolhouse Creek area, will be dealt with in the following section.

History of the site

The earliest evidence of human occupation in the Schoolhouse Creek area has been mentioned above in the context of the general Maori occupation of the Nevis Valley. The evidence for this Maori occupation, possibly stretching back to the Moa Hunters of the 14th century, was first documented by Philip George, a local historian, who found the remains of a Maori site at the mouth of the creek.²⁷ The sites have subsequently been lost.

Jill Hamel identifies Schoolhouse Creek, amongst others as the location for some of the earliest mining sites in the area.²⁸ Its earliest mention in the historical record is in 1865 where the Officer in Charge, Mr J. I. Anderson, reported on the 21st October of that year:

*"Since my last report, the only feature of any particular interest in regard to this field that has presented itself is, the fact that within the last few days, gold has been found upon a terrace adjoining Stewart's Gully and within a few minutes' walk of this township. Good payable prospects have been obtained, and in consequence, a number of claims have already been marked out."*²⁹

(Stewart's Gully, after the construction of the first Nevis School in 1874 eventually came to be known as Schoolhouse Creek, with the surrounding area known as Schoolhouse Flats.³⁰ Both names still appear on maps today.)

Exactly a year later, the *Daily Times* reported on the prospectors' fortunes:

"...At Stewart's Gully, which is being ground sluiced on a large scale, the different parties are said to be reaping a golden harvest, which they richly

²⁶ *Ibid.* page 18

²⁷ *Ibid.* page 93

²⁸ Hamel (1994), page 9.

²⁹ *Otago Witness*, Issue 727, 4 November 1865, Page 11

³⁰ NZHPT Registration Report, page 134

*deserve for the perseverance displayed by them in constructing such costly races.*³¹

Unfortunately neither account provides names of prospectors or the exact areas referred to. The information provided here is that ground sluicing, augmented by the construction of water races was underway here on 'a large scale' between November 1865 and the following year.

One of the most consistent and detailed of sources of mining information in this area, and for many of the other parts of the Nevis Valley, are the survey office plans held by LINZ. Unfortunately, it isn't until the beginning of the 1880s, when hydraulic elevation claims and, more particularly, river-dredging claims, became viable in this high valley that this particular stream of information runs at more than a intermittent trickle. Between about 1880 and 1920, some 45 SO plans detailing mining claims, housing plots and other such claims in the Nevis were issued. After about 1920 only a small number of new plans were issued.

The 1881 SO 1255 topographical plan of the Lower Nevis shows extensive works throughout the Nevis valley, but none actually up Schoolhouse Creek (see picture ii). From this one can surmise that the 'large scale' works of 1865/66 have not maintained their presence into the penultimate decade of the 19th century, but not what this ground was used for at the time.

The SO plans from the end of the 19th century indicate much activity amongst Chinese miners just to the north of the Schoolhouse Creek/Nevis River confluence and south of the where the flats meet the high terraces just downstream from the Lower Nevis township. This is evident from the examples of 'Chinamen's Claims' detailed in pictures vi to ix of Appendix C. Most significant of these is Long Chong's water race (pictures viii and ix of Appendix C) which can be traced running down from the high ground to the south of the Schoolhouse Flats area.

Picture ix also shows a portion of a Mr T. Norris's water race, running along the flats near to the southern bank of Schoolhouse Creek. A Mr Thomas Norris appears in the Otago Nominal Index as resident in the Dunstan in 1876/77 and 10 years later a Mr T. Norris '...one of the old hands, left [the Nevis] for the new South Australian Rush'.³² There is no direct evidence that these are the same "T. Norris" of SO 5959 (picture ix), but it is a name with which we can tentatively fit into the dearth of information which exists around the interior of Schoolhouse Flat between 1866 and the end of the century.

³¹ *Otago Daily Times*, Issue 1513, 2 November 1866, Page 4

³² *Otago Witness*, Issue 1832, 31 December 1886, Page 18

SO 5959's *raison d'être*, was to establish Messrs Bews and Robertson's claim which extended between the southern boundary and the banks of Schoolhouse Creek in 1900. It is tempting to suggest that this means that the flats were disturbed by subsequent connected mining activity. However, DJ Bews had interests more-or-less solely in river dredging at this time and it is likely that this claim was connected with dredging plans, rather than any plans for the flats.³³

Between the turn of the 19th/20th centuries and the beginning of depression mining in the 1930s, there is another large gap in historical evidence, especially of the all important Survey Office plans. It is likely that most of the Schoolhouse Flats area, especially upstream to the west of the road, had little or no attention paid to it. However, with the advent of the Depression of the 1930s, interest in mining in the Lower Nevis sparked again. Picture x of Appendix C is a survey plan dating to 1935. This, again gives an indication as to the siting of proposed works during this era, though not exactly where, if at all, this happened. The company which held this claim, Nevis Sluicing Claims Ltd., is mentioned in the press, briefly, during this middle year of the 1930s:

*"...The company was incorporated on 28th February last year, to acquire mining rights, etc., and 215 acres of alluvials at Schoolhouse Creek, Lower Nevis, Otago, from various venders...Hydraulic sluicing was carried out at the claim until the end of May, recommencing at the end of September..."*³⁴

Jill Hamel's description of the 20th century workings on the terraces to the north of the creek, describes several parties working with various degrees of success and persistence; from small groups of miners to companies such as the Nevis Sluicing Claims and also parties of unemployed, inexperienced men, brought to the area by the Unemployment Board.³⁵

The terraces to the south of the creek, where the hills rise from the flats was worked at this time up to about 1939 by the Adies, a long established family in the valley.³⁶ It is likely that they utilised existing water races in the hills above; although whether these races to the south of the flats were repaired and widened to carry more heads of water, like the Nevis Sluicing Claims to the north³⁷, is not known. In her 1994 report, Jill Hamel laid out a series of sketch diagrams of archaeological features for much of the Lower Nevis; I have reproduced one of these, showing the south side of Schoolhouse Flats in picture xi, Appendix C.

³³ Dr. Matthew Schmidt Pers. Comm.

³⁴ *Evening Post*, Volume CXIX, Issue 149, 26 June 1935, Page 12

³⁵ Hamel (1994), page 11

³⁶ *Ibid.*, page 21

³⁷ *Evening Post*, Volume CXVIII, Issue 27, 1 August 1934, Page 12: "...Since the company took over on March 1 last a total of 107 chains of the water race has been enlarged to carry the full 30 heads..."

After mining dwindled to almost naught from about 1940 onwards, the latter half of the 20th c. saw little activity in the vicinity of Schoolhouse Creek and the Flats to the south. Jill Hamel's sketch map, reproduced in picture xi, shows what she describes as 'a great network of races' which line the creek, the terraces around and the flats themselves. According to Hamel, most of the races present on the flats are likely to have been built 'in the last 20 years or so' (say, from c. 1974 – c. 1994, when her report was written) as part of a local irrigation scheme.³⁸

In the 21st century, a mining permit was issued to Colman Mining which then proceeded to mine close to the creek. The permit (no. 5390864) was issued from 2002 onwards. (See Certificates of Title, Appendix B). The areas mined by Colman's have been indicated on Figure 3 of Appendix D, shaded in green.

Site Visit - Observations on site

A visit to the site was conducted in order to provide evidence to back up some of the conclusions provided by the historical research that have been outlined above.

Photographs of the site visit, referred to in this text, can be found in Appendix E, with the photograph's position indicated in Figure 3 of Appendix D by a red number and arrow.

I have split this section into observations on the various historical features which have appeared in the above history and those observed during the site visit. These fall into approximately four areas: a collection of tailings and building features near the south bank of the creek at the eastern extremity of the proposed mining development; tailings and race features on the creek's southern bank, further upstream; race-features flowing across the flats; and workings identified by Hamel as possibly Adies' 1939 mining venture on the terrace to the south of the flats.

Tailings and building features to the east of the site

These features occupy a position near to the eastern extremity of the area under the proposed mining development. This area is a mixture of development periods, from apparent 19th c. tailings and building features to 21st century mining areas. **Picture 1** of Appendix E shows a flat area of ground that has been mined by Colman in the last decade. This is characterised by a flat, rock-strewn ground which has evidently been deposited recently. Nearby is an interesting feature which fortunately hasn't been touched by this development. This feature can be described as an earthen walled enclosure, rectangular, with dimensions about 15m x 18m and surrounded by a ditch

³⁸ Hamel (1994), page 18

about 0.3m deep (**Pictures 2 & 3**). The function of this feature is not certain, it being on the small side for an animal enclosure and those ditch features being an odd accompaniment to a building.

To the north west of this feature, on the south bank of the creek and to the west of one of the modern mining areas lies a set of features, which mostly seem to be constructed of tailing stones. Most prominent of these features is known locally as 'the corral' is an enclosure about 12m x 11m constructed of stacked schist (**Pictures 4 – 6**). It is probable that this enclosure was never more than an animal pen as the low stacked schist walls aren't constructed to any kind of load bearing standard and there is no evidence that a roof once existed here. However, a few metres further upstream, there is a small room or hut feature, again built into the tailings (**Picture 7**). This feature is filled with much debris, some of this of obvious recent date; though there is some possibly older material present here too, especially the sheets of iron which suggest that this feature was once roofed. These two features can be seen in context in **Picture 8**, which also shows some tailings features stacked in a bank running alongside the creek. These tailings features differ somewhat from other tailings features further upstream (see below), as they are more buried and less well defined stacks than those upstream.

Upstream – Tailing and race features

Further west, up the creek, tailing features and associated races are much more defined and readily identifiable. **Picture 9** shows tailings features running in a line parallel to the creek with a possible stone lined race in the foreground. Although overgrown with vegetation, the line of the tailings is more easily discernable than features further downstream.

There is also a small stone wall feature here, below the tailings and above the race feature. Shar Briden has described this as a possible hut feature, and its general layout certainly suggests this, although little enough remains of the walls' height to be certain.

As one progresses further upstream, the tailings become even more defined. **Picture 10**, taken looking north, shows this particularly well defined set of tailings with identifiable sludge channels running between the stacked stones. This is probably the best preserved section of tailings on Schoolhouse Creek.

A little further upstream, the tailings and race features are again discernable running parallel to the creek. These race features are more substantial and are partially constructed of stacked stone which have preserved these channels and allow them to be traced with ease through the landscape (see **Pictures 11 & 12**).

Flats water races and other features

A multitude of water races run across the flat, heading mostly down the valley, though sometimes running at right-angles to this (See **Pictures 13 – 15**). There appear to be two phases of features here, seen in **Picture 14**: here a smaller water race runs from the hills to the south, towards the creek. It is, however, cut by a larger water race running at right-angles down the valley. The inference here is that the smaller water race is the older one. This will be discussed below.

There are some areas of the valley floor which show signs of test-prospecting in previous centuries. **Picture 16** is an example of two of these pits, side by side. Digging these pits would have allowed miners to prospect for valuable ground without the waste of performing full mining operations here.

To the South – Adies' Workings

The southern edge of the valley of Schoolhouse Creek is dominated by a set of workings which have nibbled away at the valley's side. **Picture 17** shows the extent of these works in this southern hillside, where a sizable chunk of the landscape has been sluiced away. **Picture 18** is taken looking west, up the central gully created by the sluicing. There are several tail-race channels, leading north towards the flats; one of these channels has a stacked stone revetment at its fundament. **Picture 19**, looking east downhill towards the Nevis River, gives an indication as to the scale of the workings here.

Discussion – Archaeological Significance & Development

Observation of the whole site presents an area with some features of archaeological significance. The dating of surviving and subsurface features has been primarily historically based, with contemporary Survey Plans providing some dating evidence. In many cases, the observation on the ground corroborates the evidence gathered from these historical sources.

The historical evidence puts mining activity in the Schoolhouse Creek valley as early as the mid-1860s, with ground sluicing occurring here on a large scale. On site observation shows that a large amount of tailings still exist down by the creek. These, along with their associated water races, especially those revetted with stacked stone, almost certainly date from these closing decades of the 19th century. This puts the stacked stone structures observed down by the creek – the two hut features and the 'corral' as being later than this, as they are built from and abutting some of these tailings features. Exact dating of these structures is problematic without the kind of investigations which could uncover datable artefacts in sealed contexts. The debris on the surface is, unfortunately, of a very mixed date.

The dating of the water races which cross the flats to the south of the creek appear to be of maybe two distinct dates, with the smaller races (running at right-angles to the creek) being cut by the larger races which run down the valley, roughly parallel with the creek. The smaller races may be tail-races from the Adie's workings on the southern side of the valley, being cut by later races used for what Jill Hamel identifies as a late-20th century irrigation scheme. The exception to this is the water race owned by T. Norris, running parallel to the Schoolhouse Creek in the late-19th c.

The area identified by Jill Hamel as being Adie's c. 1939 workings has been identified as possibly occupying an earlier area of 19th century mining works. Looking at the positioning of Long Chong's races (picture ix, Appendix C), it is certainly tempting to assume this. However, some of the identified channels from aerial photography (light-blue lines in Fig. 3, Appendix D), coupled with the races identified by Jill Hamel indicate that Long Chong's race could start from the hills at a point of the hills to the south of Adie's works, before flowing south and east towards the Lower Nevis Township's second cemetery.

In terms of proposed development of the site, there are some areas where archaeological features might come into contact with proposed mining operations of the future. These areas are as follows:

- Anywhere along the length of Schoolhouse Creek where stacked schist tailings and provably associated races are present.
- Any stone structure features made of or built into the tailings.
- The rectangular, earthen-walled enclosure with ditch further downstream.
- The stacked stone revetted water races further upstream of the main tailings area.

However, the gentlemen proposing to mine this area in the near future are cognisant of heritage features and the option to work around, rather than through them. There is certainly room for discussion between the developers and the NZHPT as to mining boundaries which allow for development of the site, whilst protecting heritage features.

Summary

- The discussion above has summarised the findings of this assessment in terms of the significance of existing and buried material on this archaeological site of an significant nature.
- The observations from historical sources and site visits indicate the presence of possible 19th c. mining features, still extant amongst mining and irrigation features from the 20th and 21st centuries.

Recommendations

- An application to the NZHPT for an Archaeological Authority under the Historic Places Act (1993) will be required before the project can commence.
- A dialogue should be maintained with the NZHPT as to the protection of heritage features, the mitigation of any necessary development of heritage features and the fencing off of particularly delicate features.

Conclusion

Jill Hamel has described the Lower Nevis goldfield as 'a mosaic of all types of workings of all the major periods of historic gold working in Otago'.³⁹ The development history of the Lower Nevis has always been one of modern mining techniques replacing old ones and adding their own distinctive marks on the landscape.

So future mining development is not an anathema to this undoubtedly important historical landscape. However, Development with Dialogue amongst all parties interested in the heritage aspects and the existing gold-baring soils should be the watchwords.

This report provides an assessment of the historical, archaeological and heritage significance of the proposed bicycle trail development at Schoolhouse Creek, Lower Nevis Valley, Pt Run 345A. It is intended to provide enough information about this significance to allow an informed decision about the site's future to be reached.

³⁹ Hamel (1994), page 32

References

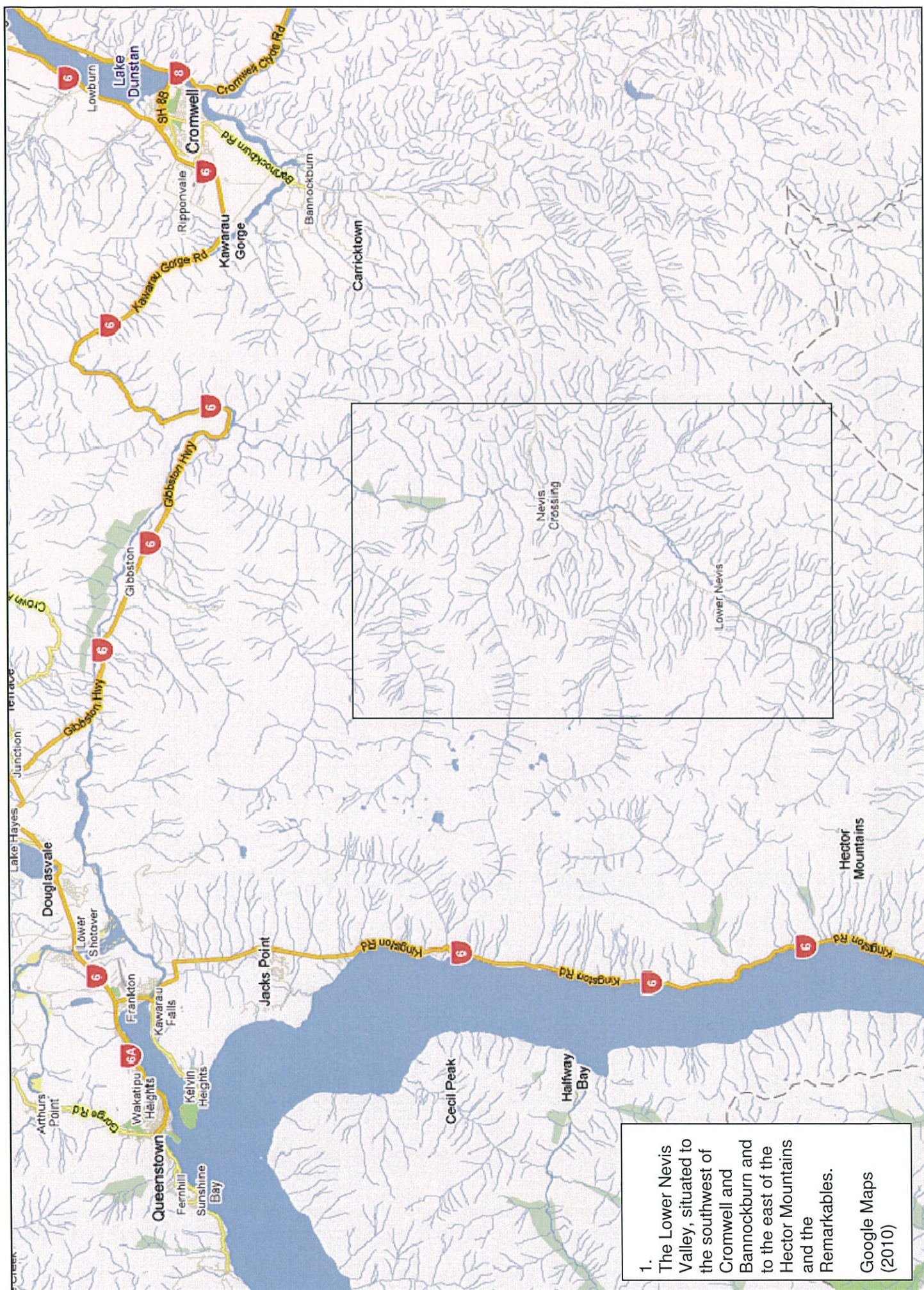
- Appendix to the Journal of the House of Representatives:
 - AJHR, 1863 Session I, D-06
 - AJHR, 1874 Session I, H-09
 - AJHR, 1877 Session I, H-01
 - AJHR, 1879 Session II, H-11
- *The Evening Post*
 - *Evening Post*, Volume CXVIII, Issue 27, 1 August 1934, Page 12
 - *Evening Post*, Volume CXIX, Issue 149, 26 June 1935, Page 12
- H. A. Gordon (1894) *Mining and Engineering and Miners' Guide*, Samuel Costall, Government Printer, Wellington.
- Hamel, Jill (1994) *The Cold, Sequestered Nevis*, report to the Department of Conservation on the historic values of pastoral leases in the Central Otago high country.
- *The Lower Nevis Historic Area* – Registration Report by the NZHPT, registered June 2010
- *The Otago Daily Times*:
 - *Otago Daily Times*, Issue 1039, 19 April 1865, Page 6
 - *Otago Daily Times*, Issue 1084, 10 June 1865, Page 4
 - *Otago Daily Times*, Issue 1513, 2 November 1866, Page 4
 - *Otago Daily Times*, Issue 2621, 1 July 1870, Page 2
 - *Otago Daily Times*, Issue 2646, 30 July 1870, Page 6
- *The Otago Witness*:
 - *Otago Witness*, 28th November 1862, page 3
 - *Otago Witness*, Issue 670, 1 October 1864, Page 13
 - *Otago Witness*, Issue 727, 4 November 1865, Page 11
 - *Otago Witness*, Issue 1832, 31 December 1886, Page 18
- *Tuapeka Times*, Volume XXII, Issue 1613, 10 August 1889, Page 2

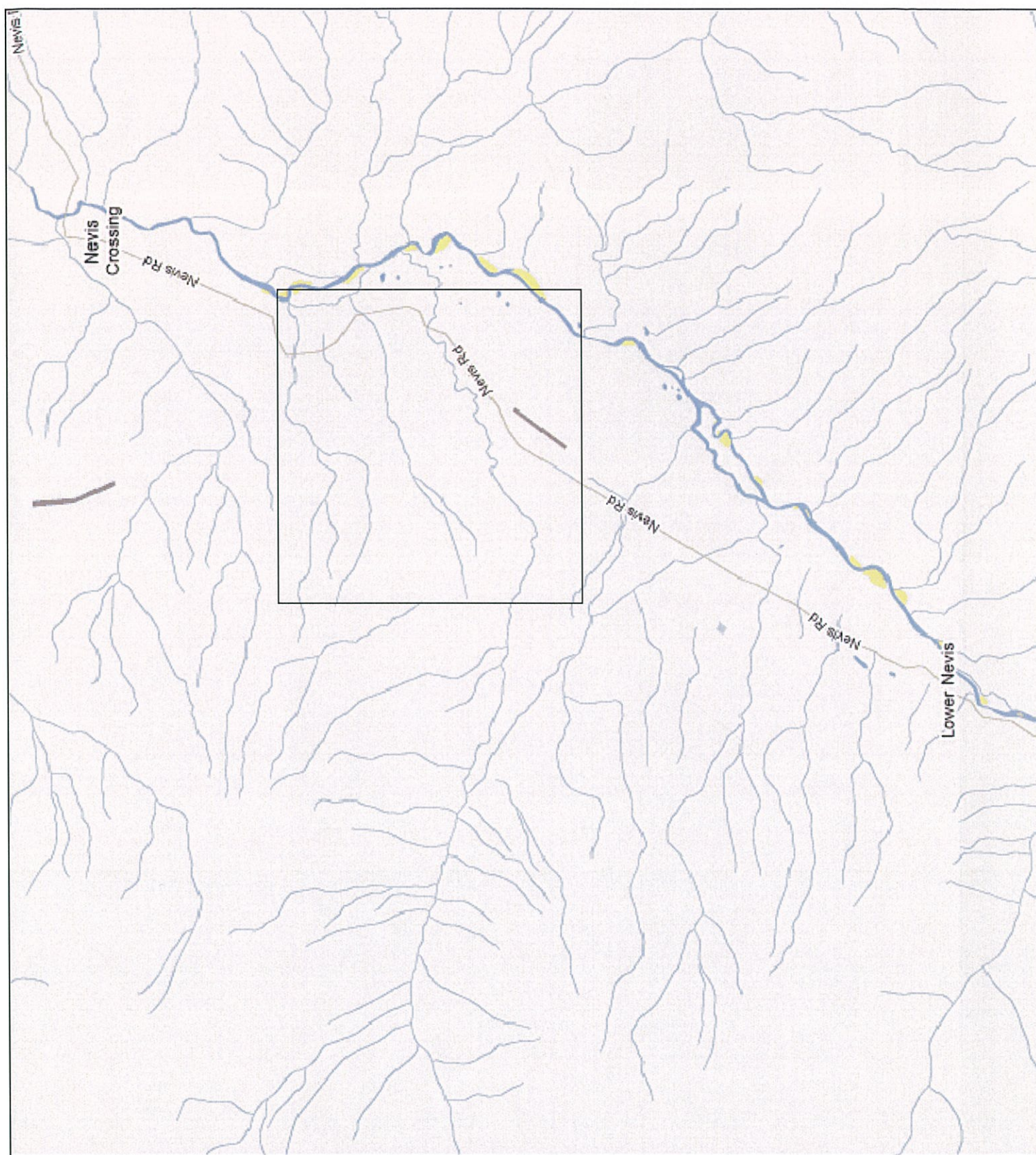
And

Without Jill Hamel's *The Cold, Sequestered Nevis* and the information contained therein, this report would have been much harder to put together.

Appendix A

Location Maps

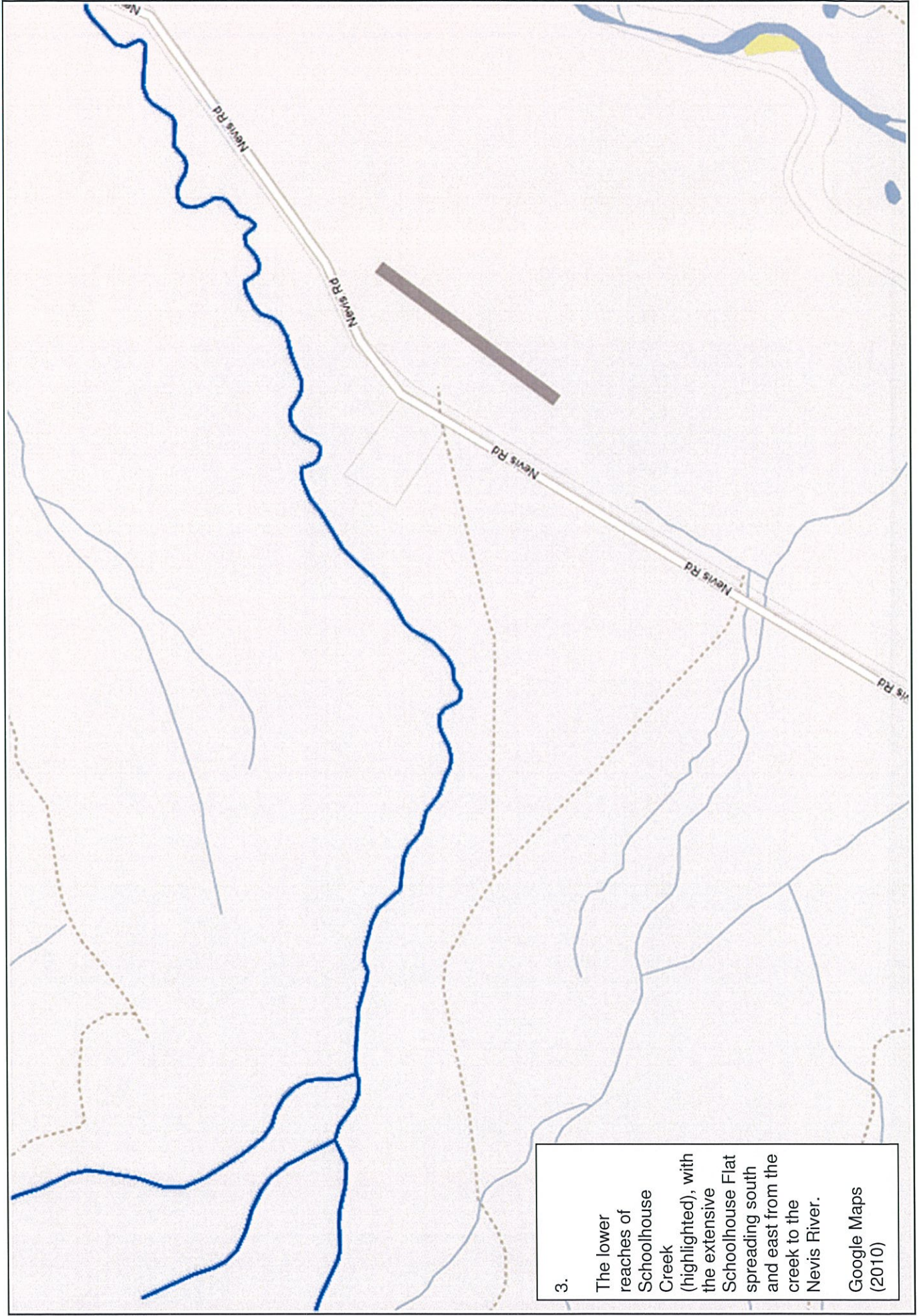




2.

The Lower Nevis and its eastern bank. Schoolhouse Creek runs down from the Hector mountains, flowing east.

Google Maps (2010)



3. The lower reaches of Schoolhouse Creek (highlighted), with the extensive Schoolhouse Flat spreading south and east from the creek to the Nevis River. Google Maps (2010)

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

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Organisation (if applicable):	Royal Forest and Bird Protection Society of New Zealand Inc.
Role (if applicable):	Otago Southland Regional Conservation Manager
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Phone:	[REDACTED]
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Please see attached submission

My submission is (include the reasons for your views)

--

What further information sources should we consider in this reclassification?

Please see attached submission

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of submitter or person authorised to sign on behalf of submitter

Rick Zwaan

Date 26/2/21

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

Forest and Bird Submission on the Kawarau/Remarkables Conservation Area reclassification (round 1)

Submitters details:

Name: Royal Forest & Bird Protection Society of New Zealand Inc.

Contact details:

Rick Zwaan

Otago Southland Regional Conservation Manager

Phone: [REDACTED]

Email: [REDACTED]

Introduction and about Forest & Bird:

1. Forest & Bird is Aotearoa New Zealand's largest and oldest conservation organisation. For almost a century we have advocated for the protection and preservation of New Zealand's native species and habitats, and more recently have campaigned to halt their decline.
2. For a number of decades, we have actively been advocating for enhancing the protection of the important conservation values of Kawarau/Remarkables area.
3. This submission has been developed with the helpful input of members of the Central Otago Lakes Branch who have been exploring and advocating for the area since the 1960s.
4. We worked alongside FMC in the 2017 Forgotten Lands campaign calling for the area to have National Park status, to recognise the high importance of the ecosystems present and help build the representativeness of national parks around Aotearoa.

Summary

5. We are pleased to see the reclassification of the area progressed, and recognise the key role Papatipu Rūnanga hold in the process, as manawhenua of the area.
6. Pastoralism, gold mining, predators, and ski field development have all impacted on the magnificent ecological and landscape values of the area. It is time these threats to the natural ecosystems were minimised, and habitats restored through increasing the protection of this nationally significant area for Aotearoa.
7. The significance of the area's ecological, biodiversity, landscape, and recreational values has been recognised and well documented for decades.

8. The current designation of stewardship land epitomises the fact that stewardship land often has very high conservation and landscape values deserving of higher protection statuses.
9. Together with FMC we have long called for enhanced protection of the area.¹ We are broadly supportive of the points FMC so eloquently make in their submission. We believe that National Park status is appropriate for the area, especially if this is extended across adjoining areas.
10. We have read and largely support FMC's substantive submission on this reclassification. Rather than repeating their points, this submission presents a concise high-level perspective and commentary on the supporting reports presented, with a view to a more comprehensive submission at later stages.

Comment on background reports & additional information

We note that none of the supporting documents make reference to the considerable body of work undertaken by and on behalf of the Department of Lands & Survey (fore-runner of DOC) in 1977², motivated by the Remarkables skifield proposal. That Management Study, together with supporting documents, includes information and recommendations still directly relevant to the current reclassification.

Ngāi Tahu Values report

11. The Ngāi Tahu Values Report presents an insightful and helpful summary of the history and connections and values of the area. This perspective was lacking in the earlier Management Study.

Ecological Values Report

12. Similarly, we are pleased with the reasonably comprehensive Ecological Values Report. Protection of these values should be at the forefront of reclassification considerations. Further work should be undertaken to secure additional adjoining land for conservation purposes, to ensure the current arbitrary boundaries of the area do not undermine the protection of important habitats.

Landscape Values Report

13. The draft Landscape Values Report is helpful but could do with strengthening and further research. It should refer to the previous major landscape assessment by the Department of Survey and Land Information (see above). There are outstanding landscape values in the current conservation area and adjacent land which have long been recognised as deserving of greater protection.
14. The draft report omits to mention a major geological boundary within the area which influences the geomorphology on large and small scales.³ This extends from the

¹ See for example, *The Remarkables National Park* (www.fmc.org.nz/remarkablesnationalpark) for an excellent summary of the land's natural, recreational, and historic values

² Remarkables and Hector Mountains, Otago, NZ. A Management Study. Dept of Lands & Survey, Dunedin 1977

³ See for example: Cox, S.C. (1991) The Caples/Aspiring terrane boundary—the translation surface of an early nappe structure in the Otago Schist, *New Zealand Journal of Geology and Geophysics*, 34:1, 73-82, DOI: 10.1080/00288306.1991.9514440

northern end of the Remarkables mountain range near Double Cone, where there is a transition zone between the schists of the Caples terrane and the schists of the Aspiring terrane, south past James Peak.

15. The draft report confuses some aspects of geology and climate. For example, the lignite and shale in the Nevis are lake deposits estimated to be about 15 million years old,⁴ whereas the totara logs are remnants of post-glacial forests about 5,000 years old. These unrelated concepts are conflated in the report.
16. It is helpful to see the landscape report acknowledging the arbitrary boundaries of the current Conservation Area and the threats posed to the values if adjoining land is not afforded similar protection. Extending through the Nevis is a priority, and consideration could be given to ways of incorporating Loch Linnhe Station into public conservation land. FMC make the sensible suggestion of joining the Remarkables Conservation Area with the Garvies and Kopuwai ranges to make a truly significant park, which will preserve landscapes and ecosystems present nowhere else in New Zealand.

Historic Heritage report

This report emphasises gold mining in the Nevis, at the expense of the pastoral history, and the remainder of the study area.

17. Additional sites of historic interest related to pastoral farming include the derelict Stewarts Ck and Elliot Spur huts. The raceman's hut in Doolans Creek, and associated water race, get little attention.⁵ The remnants of many kilometres of fencing in upper basins (Two Mile Creek; Wye CK) are also significant historic artefacts. There is a ruined stone hut in the bush above the Wye Creek North Branch water intake. Reference could be made to Watson (2012).
18. No mention is made of the Pioneer Energy Wye Creek power scheme. Part of this lies within the Conservation Area, and dates back to the 1920s. In addition to its infrastructural and financial significance, it has become a factor influencing recreation – it provides easy access to rock climbing areas.

Recreational Values report

19. The Recreational Values Report would be strengthened by references to previous assessments for similar purposes (e.g. the 1977 L&S Management Study; and *Outdoor Recreation in Otago* (Mason, 1989).⁶

⁴ See for example: Turnbull, I. M. (compiler) (2000) Geology of the Wakatipu Area. Institute of Geological & Nuclear Sciences 1:250 000 geological map 18. Lower Hutt, New Zealand.

⁵ See Watson, K. (2012). Otago Conservancy Pastoral and Mining Huts: a historic heritage assessment. Underground Overground Archaeology Ltd. for Department of Conservation

⁶ Mason, B. (1989). Outdoor Recreation in Otago. V 2, Silverpeaks and Otago's Alps. Federated Mountain Clubs of New Zealand (Inc.) P O Box 1604, Wellington.

20. At times the report conflates *recreation* and *tourism* activities. While nuanced, the distinction is important given the distinction made in the Conservation Act 1987 s6(e) to 'foster' recreation and 'allow' tourism.
21. There is extensive use of rock bivvies for tramping and ski mountaineering activities in the area, which is not recognised. For example, there are two in the Lake Alta Basin, and several in the South Wye, among others.
22. Reference should be made to books like the *Moirs Guide North: the Otago Southern Alps* or *Queenstown Rock, Ice & Boulders* for more substantive descriptions of the recreational opportunities.
23. It would be helpful to further explore how any promotion and expansion of recreational and tourism activities, with consequent higher visitor numbers, will impact on the ecological, biodiversity, and landscape values of the area.
24. This report highlights mountain biking opportunities, whereas the ecological and landscape values reports note the threat these pose when not appropriately managed. Regardless of what land classification is pursued, appropriate management of mountain biking, consistent with the outcome of the Partial Review of the Otago CMS, is essential in order to protect fragile ecosystems.
25. The North Branch of Doolans Creek (the Doolans Basin) has significant conservation and recreational values which could easily be degraded without careful management of visitor pressure resulting from the relatively easy access via the Remarkables skifield. The quiet wilderness of this area *must* be upheld in this reclassification.
26. In promoting the classification of National Park, we are very conscious of the added visitor pressure this will bring. If pursued, it will be essential to establish and enforce a strong management plan that retains and protects the outstanding ecological and landscape values while allowing for the quiet enjoyment offered through low impact recreational activities. Development of new tracks and huts should not be allowed, although maintenance of existing tracks can be accommodated if essential for management purposes.

Conclusion

27. We welcome the opportunity to be involved in this reclassification, to provide feedback on the supporting material, and to add further information. We note that DOC policy on reclassification requires that "*All the cultural, historic, economic, landscape and recreational values of the land must be considered before a decision can be reached.*"
28. The Kawarau/Remarkables Conservation Area is of national significance and needs a fitting conservation status; we suggest a National Park should be created.
29. While we recognise the focus of this reclassification on the Kawarau/Remarkables Conservation Area, we suggest further land could be added in future to enhance the protection of adjacent outstanding ecological and landscape values. We note that the Glenarary Station is currently going through Tenure Review which presents an opportunity for an extensive addition to Public Conservation Land that could in turn

be incorporated into a future National Park.

30. We support the suggestion from FMC that a holistic report highlighting the myriad of outstanding values would be beneficial to aid engagement with the reclassification as it progresses.
31. We would emphasise that reclassification must consider the long-term effects of climate change, which will adversely affect ecological values, but in contrast will result in less feasible downhill skiing activity. This has implications in terms of any proposed expansion of this activity into pristine areas.
32. Careful consideration must be given to any future management plans for the area to ensure the inherent values are maintained. This should include limiting concession activities to ones which are consistent with the values of the park.
33. As the project progresses, we would like to be involved in the development of substantive reclassification proposals, and are willing to offer local expertise to elaborate on the points raised in this submission
34. We would like to be at the table for the development of subsequent management plans resulting from this reclassification process

Thank you for considering our submission and we look forward to seeing this reclassification progress.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Sean Dent
Organisation (if applicable):	
Role (if applicable):	
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Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

Support in part the reclassification of land in the Kawarau / Remarkables Conservation Area.

My submission is (include the reasons for your views)

I Support reclassification of the affected land to better

protect the values subject to the following:

- ① Recreational hunting must be maintained / provided for under an open hunting permit throughout the affected land.
- ② Hunting with a dog must be maintained / protected throughout the affected land.
- ③ Signage regarding routes / access to be improved & maintained i.e. the access routes to the Deolans from the ~~the~~ Nevis Crossing.
- ④ Effective signage & subsequent enforcement about 4wd / ATV / motor bike access or lack thereof - such of walking into areas to hunt only to be followed by 4wd's & motorcyclists.

Local P4 saddle is currently very bad for this with two stroke motor bike riders using the water race track.

What further information sources should we consider in this reclassification?

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

Printed name of submitter or person authorised to sign on behalf of submitter

26/02/21

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

26 February 2021

New Zealand Game Animal Council



Submission on the Kawarau/Remarkables Conservation Areas reclassification

1.0 About the New Zealand Game Animal Council

The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory agency with responsibilities for, *inter alia*, advising and making recommendations (in relation to game animals) to the Minister of Conservation, raising awareness of the views of the hunting sector, and advising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.

2.0 Reclassification of the Kawarau/Remarkables Conservation Areas

The GAC endorses the proposal to reclassify the Kawarau/Remarkables conservation areas.

The GAC considers reclassification of the Kawarau/Remarkables stewardship lands would be best served by the creation of a new Conservation Park.

A conservation park would ensure the necessary layers of protection for conservation, cultural, recreation and other important values. The current classification of 'stewardship lands' are not formally identified as important for biodiversity, conservation, or recreation.

The Conservation Act section 19(1)(a) and (b) outlines that every conservation park shall be managed so that its natural and historic resources are protected; and subject to that, to facilitate public recreation and enjoyment. Reclassifying the Kawarau/Remarkables conservation area as a conservation park would ensure the balance between ecological, recreational, and cultural values are facilitated and protected.

A new conservation park would align with the network of conservation parks stretching from Marlborough to Southland. Locally, it would align with the Hawea Conservation Park, Ahuriri and Oteake Conservation Parks.

3.0 Values associated with the Kawarau/Remarkables Conservation Areas

There are both 'significant' and 'diverse and common values' associated with this area, including:

- The western faces of the Remarkable Mountains area, which is one of the most iconic and unique mountain ranges in New Zealand made more famous by its proximity to Queenstown
 - the abundance of rocky terrain
 - some nationally threatened and at-risk plant species, however, the native species generally remain 'diverse and common' (DOC, Kawarau/Remarkables Conservation Area ecological values, page 11).
-

- The Kawarau/Remarkables Conservation Area contains diverse recreational opportunities, including as a regionally significant hunting area.
- the history of gold mining in the Nevis Valley and river catchment
- The area is of high historical and cultural significance to Ngāi Tahu with walking and vehicle access providing Ngāi Tahu Whānui with regular opportunities to undertake a range of recreational activities.

Queenstown is a key tourism destination, and from that tourism comes the need for recreation spaces. Queenstown, and the surrounds, is arguably the adventure capital of New Zealand. Statistics from New Zealand Tourism show that over 1,306,572 tourists and other travellers visited Queenstown in the year ending December 2018. Many of these visitors would have spent time hiking, mountain biking, hunting, skiing, fishing, tramping, climbing, and camping in the Kawarau/Remarkables area.

The importance of recreation needs to be recognised in any decision-making process with regards to the Kawarau/Remarkables Conservation Area.

The GAC sees it as vital that any reclassification of the area fosters recreation while providing adequate protection for environmental and cultural values. The GAC considers this balance is best achieved through the creation of a Conservation Park.

Many parts of the Kawarau/Remarkables conservation area have been grazed or have been affected by human habitation, clearance, and fire.

Over the past 30 years much of the land in question has been reclaimed through the tenure review process, with the addition of ex-pastoral leases increasing the Conservation Area to 33,085 hectares. The GAC does not consider this reclaimed land meets the criteria for the creation of a national park under the National Parks Act 1980 (section 4).

4.0 Hunting in the Kawarau/Remarkables Conservation Areas

Red deer, chamois and pig hunting are popular and valued recreational activities in the Kawarau/Remarkables Conservation Area. The Remarkables Wye Creek hunting block is an important recreational asset to hunters in the Otago and Southland regions.

Central Otago has a growing population with a high level of engagement with the outdoors. Hunters value the Remarkables/Kawarau area for its predominantly open tussock land which creates a challenging recreational hunting experience in a scenic location. The red deer, chamois and pigs harvested from the area are renowned for both high quality heads and their meat.

Quality hunting opportunities and good game animal management outcomes require well-managed recreation areas.

Security of access to public conservation lands assists hunters to play their part in the sustainable management of game animals and the protection of conservation values. To be able to legitimately access hunting areas, hunters require the ability to carry firearms, use dogs (where allowed) and use motorised transport (where appropriate).

Reclassifying the Kawarau/Remarkables Conservation Area as a conservation park will provide for this. Reclassification as a national park will threaten, not only access to hunting areas, but the viability of the hunting resources itself.

The GAC has a statutory requirement to improve hunting opportunities and game animal management and is therefore unable to support the reclassification of the Kawarau/Remarkables Conservation Area as a national park.

The GAC is also concerned that the Department of Conservation is not sufficiently resourced to adequately manage our existing national parks network. Adding a new national park will not only stretch existing resources even thinner but could have a detrimental impact on the management of the region's other conservation areas.

5.0 Valued Introduced Species in New Zealand

Te Mana O Te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020 recognises a number of introduced animal and fish species, including deer, chamois, tahr, wild pigs, salmon and trout, as being valued introduced species. These animals have become an important part of New Zealand life and require sustainable management for both their resource value and conservation impacts. For many New Zealanders, deer, chamois, tahr and wild pigs are critical to their everyday lives as they provide recreational, cultural, food gathering and commercial opportunities and are important avenues for community conservation efforts.

Deer, tahr, chamois and wild pigs, are legally Wild Animals under the Wild Animal Control Act or Game Animals under the Game Animal Council Act. Collectively with other species such as trout, salmon, ducks, pheasants, quail etc. they are collectively known as valued introduced species.

6.0 Summary

Taking into consideration the multiple and diverse values associated with the Kawarau/Remarkables stewardship land, the GAC submits that the creation of a new conservation park would provide an appropriate level of protection for the ecological, cultural, historic, recreational and landscape values of the area. In contrast, we believe reclassification as a national park is unnecessary to preserve conservation values, could have a detrimental impact on recreational hunting and will add to the Department of Conservation's already massive land-management burden.

If you have any queries relating to this submission, please contact me on 021688531 or at tim.gale@nzgac.org.nz.

Yours sincerely



Tim Gale
General Manager
New Zealand Game Animal Council

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Andy Pearson
Organisation (if applicable):	Southern Lakes branch of the NZ Deerstalkers Association
Role (if applicable):	Vice President
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

The proposal to reclassify the Kawarau/Remarkables Conservation Area

Our submission is (include the reasons for your views)

Our proposal

We would like to propose that the area is reclassified as a Conservation Park or National Reserve. The reasons being that either of these would bring a more appropriate level of protection to the area than at present BUT would still allow for recreational use.

The Conservation Act 1987 s 19(1) directs that – *Every conservation park shall be so managed – (a) that its natural and historic resources are protected; and (b) subject to paragraph (a), to facilitate public recreation and enjoyment.*

It is the wording “resources and public recreation and enjoyment” that we would like to focus on as this area is already very much used already by many different types of users including hunters which we advocate for.

Whilst we support a change from Stewardship, we strongly object to the area becoming a National Park for the following reasons:-

1. Deer removed

The Remarkables Conservation Area is an area for big game animal hunting (deer) and valued as a great hunting resource. If deemed a National Park, this would mean no access for dogs used for hunting and the future of the deer as a hunting resource would also be under question.

Section 4, 2(b) of the National Parks Act 1980 quotes “*the native plants and animals of the*

parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated"

2. **Limited recreational use**

Our members are huge recreational users of the area (as well as fishermen, motorised bikers, 4WDs, horse riders etc) many of these activities would be restricted if made a National Park.

The benefits of our members being able to continue to use and access this area are listed below:

- a. Health and exercise – Mental health is a huge national issue. Being able to get out in the fresh air and enjoy their passion and recreation has huge benefits to mental health. Certainly an important issue when this demographic are licenced firearms owners
- b. Source of food – Hunters harvest the meat they shoot which provides protein food for their friends and family (this is particularly important in a area where the cost of living ie house prices and rentals are extremely high)

NB Both these above points are more so important since Covid 19, as our members reside in an area hit extremely hard by the closure of borders and no tourists

- c. Conservation Values – The common theme that brings hunters together is conservation as many club members participate in pest control, stoat trap maintenance in the wider region, as well as offering up their building skills to maintain and rebuild huts via the. Back country Trust.

Pest control for farmers and landowners is often offered as a free service in exchange for permission to shoot. Having an area such as the Remarkables Conservation area where members new to the sport can go, will ensure there are enough hunters around for future pest control and "free" conservation work.

- d. Hunters for Conservation
Hunters should be part of a management plan for animal control but under the National Parks Act 1980 – recreational hunting should be the preferred means of control, helicopter culls will only incur an unpopular public response and unwarranted cost

3. The Remarkables Conservation Area as Ben Nevis station went through a Tenure review process in 2011.

To become a National Park the act states in it's principles section 4 (1) *areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.* From reading the information at the Tenure Review process there are no Biodiversity assessments stating any of the above .

We feel the principles of a National Park are not met and therefore the appropriate options (Conservation Park or National Reserve) should be considered over a National Park.

Whilst we applaud that there is a discussion and proposals sought, we would however like recorded that there are two statutory bodies missing from the consultation process.

See <https://www.doc.govt.nz/get-involved/have-your-say/all-consultations/2020-consultations/kawarauremarkables-conservation-area-reclassification-consultation/>

Fish & Game and the Game Animal Council should both be listed as interested parties. Both have stakeholder interest in the area in particular the Nevis Valley.

The Remarkables area was also discussed in 2017 after a proposal by Forest & Bird / Federated Mountain Clubs to the then Minister of Conservation. The Otago Conservation Board in July 2017 discussed this in their meeting and discussed this proposal. See <https://ftp.doc.govt.nz/public/folder/ru7czwknresmzgccwrgzga/otago/archives-2017-meetings/2017-07-11%2612-otago-conservation-board-minutes.pdf>

The results of this are listed on this link <https://www.doc.govt.nz/about-us/statutory-and-advisory-bodies/nz-conservation-authority/advice-to-the-minister-and-or-director-general/preliminary-view-on-fmc-remarkables-np-proposal/>

We note that Ngai Tahu were not in favour of it being made a National Park and the Otago Conservation Board proposed *“Further consideration be given by the Department to the merits of Conservation Park status being sought for land already under Crown ownership in the Remarkables ‘precinct’, as proposed by the Otago Conservation Board. “*
(Note not a National Park.)

Media coverage

We also feel that Forest and Bird/FMC have used their far larger resources than the hunting community to promote their agenda in the media and mislead the public that a National Park is a "done deal" and preferred by the general public and the Department of Conservation

See below a few examples of how media can influence (fake) news

Otago Daily Times

Quentin N. D. Thursday, 26 February 2021 Send us news & photos Search

Home Sport Life & Style Entertainment Business Regions Features Video Travel

Monday, 1 February 2021

Call for Remarkables to be national park

By Amy Williams

Region > Queenstown

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Queenstown's backdrop may become new national park as DOC reviews Remarkables land

Debbie Jamieson • 3:11, Dec 09 2020

Facebook Twitter WhatsApp Messenger Email

stuff

environment

New Remarkables National Park proposed

7:00 PM, Jun 16 2017

Facebook Twitter WhatsApp Messenger Email

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Call for The Remarkables to become a national park

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New Zealand World Politics Pacific To Do More Sport Business Country Local Democracy Reporting

NEW ZEALAND / ENVIRONMENT

Remarkables National Park 'long overdue'

12:00 pm 16 June 2017

Facebook Twitter WhatsApp Messenger Email

The News

Home News Community Sport Arts & Entertainment Business Features Digital Edition

Home > News > Remarkables national park proposal gains traction

Remarkables national park proposal gains traction

By Rebecca Knight • 2:14 PM, 2017

The above are ALL press releases by the FMC/ Forest & Bird but worded cleverly to mislead.

Summary

Therefore our recommendations are

- To establish a Conservation Park (as suggested in 2017) or a National Reserve
- To include and consider the advice from the other statutory bodies that have stakeholder interest ie the Game Animal Council in particular
- Ignore the media hype and make a decision based on facilitating recreational use and managing resources rather than popular media coverage and commissioned submissions that certain stakeholders can afford.

Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

(signed)

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Printed name of submitter or person authorised to sign on behalf of submitter

Andy Pearson.

Date 25th Feb 2021

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop the completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Murray Burns
Organisation (if applicable):	NZ Deerstalkers Association Inc –Upper Clutha Branches
Role (if applicable):	Co-ordinator
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

The proposal to reclassify the Kawarau/Remarkables Conservation Area

My submission is (include the reasons for your views)

Our Branches endorse the proposal to reclassify the Kawarau/Remarkables Conservation Area on the grounds that the current classification of stewardship is inappropriate and inadequate to protect the conservation and cultural values that are present.

We have considered the classification options available to us and are of the opinion that the cultural, historic, economic, landscape and recreational values of the land are not sufficient to justify a classification of **National Park**. We are of the view that whilst this classification will introduce restrictions that will ensure the preservation of native plants and animals and the welfare of the Park in general, it will be detrimental to the public's rights of freedom of entry, enjoyment of and access to, the Park. This opinion has been formed from observations of practices and activities in adjacent National Parks.

The Remarkables provide a high level of recreational opportunity and activity that would be otherwise constrained and limited by a range of rules and regulations that are principally designed to restrict environmental impacts. The biological scale, conservation value and biodiversity within the Remarkables is not sufficient to justify the level of protection that National Park status brings with it. The recreational opportunities

provided within the Conservation Area are such that they outweigh other conservation and cultural values.

We are therefore of the view that a more appropriate level of protection can be provided by a classification of either **Conservation Park** or **National Reserve**. The Conservation Act 1987 s 19(1) directs that – *Every conservation park shall be so managed – (a) that its natural and historic resources are protected; and (b) subject to paragraph (a), to facilitate public recreation and enjoyment.*

Local examples of **Conservation Park** have found public favour with recreationalists and hunters both whom are accustomed to using motorised transport where terrain allows it, including the carriage of firearms with dogs, and the use of horses and mountain bikes.

Similarly, a National Reserve classification in terms of the Reserves Act 1977 s 13(1) will make similar provision for preservation, management, the benefit and enjoyment of the public, environmental and landscape amenity.

We recommend the classification options of either a **Conservation Park** or a **National Reserve** to the Department for its consideration.

What further information sources should we consider in this reclassification?

N/A

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

(signed)

A black rectangular redaction box covers the signature. Above the box, there are faint blue ink marks that appear to be the initials 'AS'.

Printed name of submitter or person authorised to sign on behalf of submitter

Sharon Salmons – Secretary Southern Lakes NZDA

Date 18 February 2021

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop the completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

Submission on the proposal to reclassify the stewardship land in the Kawarau / Remarkables Conservation Area.

This submission is lodged by Remarkables Park Limited, Queenstown Park Limited and QTN Farm Ltd (together referred to as RPL).

RPL's Status

Remarkables Park Limited is the owner and developer of a large area of land in Queenstown that is being developed for commercial, residential, educational, recreation, innovation, entertainment, conference and tourist activity and visitor accommodation. Through associate companies, Queenstown Park Limited (QPL) and QTN Farm Ltd, RPL owns large areas of land on the south side of the Kawarau River that adjoin the DoC estate. QPL owns an 1,800-hectare high country station on the northern face of The Remarkables and this land shares an 11.2 kilometre boundary with DoC land; being a 9.8 kilometre boundary with the Kawarau / Remarkables Conservation Area and a 1.4 kilometre boundary with the Rastusburn Recreation Reserve. QTN Farm Limited is the owner of a 200-hectare block of land on the western face of the Remarkables. This land shares a 2.7 kilometre boundary with the Kawarau / Remarkables Conservation Area and, in addition, a 2.1 kilometre stretch of the Remarkables Ski field access Road (owned by DOC) passes through this block.

RPL has an interest in this matter both as an adjoining landowner and immediate neighbour and as the proponent of resort and tourist development on its Queenstown Park land. This development includes a passenger gondola that would provide a superior means of public access to the Rastusburn Recreation Reserve, with associated benefits for the Kawarau / Remarkables Conservation Area. Other activities proposed for the adjacent (privately owned) QPL land may also take the pressure off demand for new commercial activities on the DoC estate.

RPL's Submission

RPL fully supports the decision to exclude the Rastusburn Recreation Reserve from the land that is to be reclassified.

RPL accepts the reasons for initiating the reclassification process for the Conservation Area (the stewardship land) but seeks to highlight that there is room in the process to apply more than one classification to the area that is to be reclassified. The Conservation Area is large and diverse and, while some may contend that the entire area warrants a single status (National Park for instance) based on one particular feature, RPL submits that it would be a mistake not to give this diverse land holding closer examination and apply appropriate classifications to discrete parts of it as necessary. Furthermore, once a reclassification decision has been made, there is rarely, if ever, an opportunity to readdress it. For this reason RPL submits that the current process should seek to look to the future and assess the likely uses and demands on the land over the coming decades and be open to applying appropriate classifications.

The reports that have been prepared for the Department to support consideration of the proposed reclassification indicate that there will be increased demand from people wishing to access the Kawarau / Remarkables Conservation Area to undertake day walks. Furthermore, in future years there is likely to be a greater increase in skier numbers at the Remarkables ski field (than at other ski fields), because the higher elevation of the Remarkables ski field means that it will be best able to accommodate anticipated climatic changes (global warming). There is room and suitable, well-orientated terrain for expansion of the existing ski field into the adjacent Doolans valley. RPL submits that the part of the stewardship land that immediately adjoins the Rastusburn Recreation Reserve should be classified as Recreation Reserve to allow for an expansion of these activities.

In making this submission RPL notes that the Conservation Act defines 'conservation' as: *"the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations."* Emphasis has been added to the statements about providing for recreational enjoyment by the public and safeguarding options for future generations because they align precisely with the thrust of RPL's submission. RPL further notes that extending a Recreation Reserve classification to this small portion of the Conservation Area would not in any way preclude the protection of the natural environment in this area. Indeed the following definition of "Recreation Reserve" illustrates that protection of the natural environment is mandated: *"an area of open space that in conjunction with the protection of the natural environment, provides places suitable for recreation and sporting activities and the physical welfare and enjoyment of the public "*.

RPL submits that, in addition to classifying the portion of the Doolans Valley that adjoins the ski field as recreation reserve, the western boundary of the Rastusburn Recreation Reserve should be shown, in accordance with the original Title Plan, as running along the top of the northern end of The Remarkables ridge. The boundary of the Recreation Reserve is shown on Survey Office plans as *"Bdy follows Ridge"* and there is a notation that it is subject to survey. A survey of the ridge boundary has not yet been undertaken but it is apparent that some later plans and maps do not appear to follow the ridge correctly. This has led to confusion over the status of the narrow strip of land between the legal boundary (the ridgeline) and the line shown on other plans. In RPL's submission it is important to show the ridge (correctly) as the boundary of the Recreation Reserve so that it better reflects the intention that recreational walkers, climbers and those involved in alpine sports may walk to the ridge to enjoy the views over Lake Whakatipu. This would also have the benefit of more clearly defining the boundaries of the iconic western face of The Remarkables and would make both areas easier to manage. A copy of SO Plan 19547 and SO Plan 22367 is attached with the notation, showing that the boundary follows the ridge, highlighted in yellow.

RPL does not profess to have any expertise on the scientific or historic values of other parts of the stewardship land but would not be opposed to appropriate classifications being given to such areas. So long as such areas were given proper consideration in the classification process and so long as the areas identified above (the Doolans and the narrow strip between the existing Recreation reserve and the ridge) were classified as Recreation Reserve with a view to them being managed as part of the Rastusburn Recreation Reserve, RPL would be supportive of a National Park classification being given to the balance of the stewardship land.

RPL can appreciate that some parties may be apprehensive that an extension of the Recreation Reserve into the Doolans valley might lead to increased visits by the public and additional demand for parking areas and that there would be an environmental cost in creating such facilities or attracting more vehicle traffic to the DoC estate. RPL's proposed gondola would allay such concerns because it would provide an alternative (non-vehicle) transport option and could reduce the environmental footprint of those using it to enter the area. It is of course also apparent that the gondola would, in addition, reduce the physical footprint of those using it to enter the DoC estate. The Kuranda "Skyrail" gondola provides an excellent example of how a gondola can give vast numbers of people an experience of Australia's Wet Tropics World Heritage Area near Cairns, while travelling above it, rather than walking on the rain forest floor.

The gondola would provide a means of accessing the Recreation Reserve and the Conservation Area that does not rely on use of the existing mountain road and that does not increase the demand for more vehicle parking alongside the road and in the Recreation Reserve. Importantly the use of heavy vehicles, such as buses and trucks used for freight deliveries (which cause the most damage to the road), could be minimised - significantly reducing dust (on the unsealed sections) road maintenance and rebuild costs. The efficient electric motors that drive the gondola would be powered by clean, renewable energy, rather than fossil fuels - another environmental benefit over the existing means of transport to the Recreation Reserve and the Conservation Area. With the gondola in place there would be an opportunity for the Department to make the Kawarau / Remarkables Conservation Area a showcase Conservation Area, with visitors having the opportunity to enter the area with a reduced environmental footprint.

In addition to its environmental benefits, RPL also submits that the gondola would provide a safer transport option for visitors to the Recreation Reserve or Conservation Area. Although much of the access route has now been sealed, the 13km access road is still a high, mountain road with inherent dangers for inexperienced motorists or for all motorists in certain weather conditions (as recognised by the requirement to fit chains to even four-wheel drive vehicles at certain times of the year and signage identifying sections of the road where no vehicle stopping is permitted due to avalanche risk).

For clarity it is pointed out that RPL's gondola design would position the gondola infrastructure entirely within the Rastusburn Recreation Reserve. None of it would be in the stewardship land that it is proposed to reclassify and none of it would be on the iconic western face of the Remarkables. Furthermore, only a relatively small portion of the gondola infrastructure would be sited within the Rastusburn Recreation Reserve. Most of the line and buildings (73%) would be on other land (which is largely owned by RPL). The start of the gondola ride would be on RPL land in an urban area seven kilometres from the Rastusburn Recreation Reserve. So those using the gondola to access the Recreation Reserve or the Conservation Area would not be parking or queuing anywhere near any DoC land.

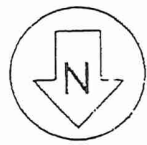
Finally, it might be useful for those deliberating on the reclassification proposal to also consider that, in addition to providing a means for the Department to better manage access for increased numbers of people wishing to use the DoC estate for short walks, skiing, alpine

sports and sightseeing, there are other ways in which the proposed gondola might lessen demand for some facilities on the DoC estate. RPL is currently working on the rezoning of the QPL land to a resort zone. This zone (Queenstown Park Resort Zone) would enable visitor accommodation and resort activities to be established within identified “Activity Areas” and notably within a “tourist village” area at the foot of the Rastusburn valley that would be directly linked to the gondola. RPL anticipates that, because its resort zoned land extends to meet the Rastusburn Recreation Reserve (at around 1,000 MASL) there are a number of alpine activities that will be able to be undertaken within its land. These would include downhill mountain bike trails and back country walking trails and undoubtedly new gravity powered adventure activities. In some instances there may be activities that overlap the DoC and RPL land. With activities such as walking trails and downhill bike rides it is likely that the end points will be on the lower RPL land and within the tourist village or other Activity Areas within the resort zone. These areas would provide toileting and refreshment facilities for participants, and educational and environmental information in addition to meeting a range of accommodation needs and providing transport links back to the urban areas of Queenstown. There would accordingly be a reduced need for such amenities and commercial facilities to be provided within the DoC estate (where the management of effluent and waste can be an issue), as they would instead be provided on privately owned land.

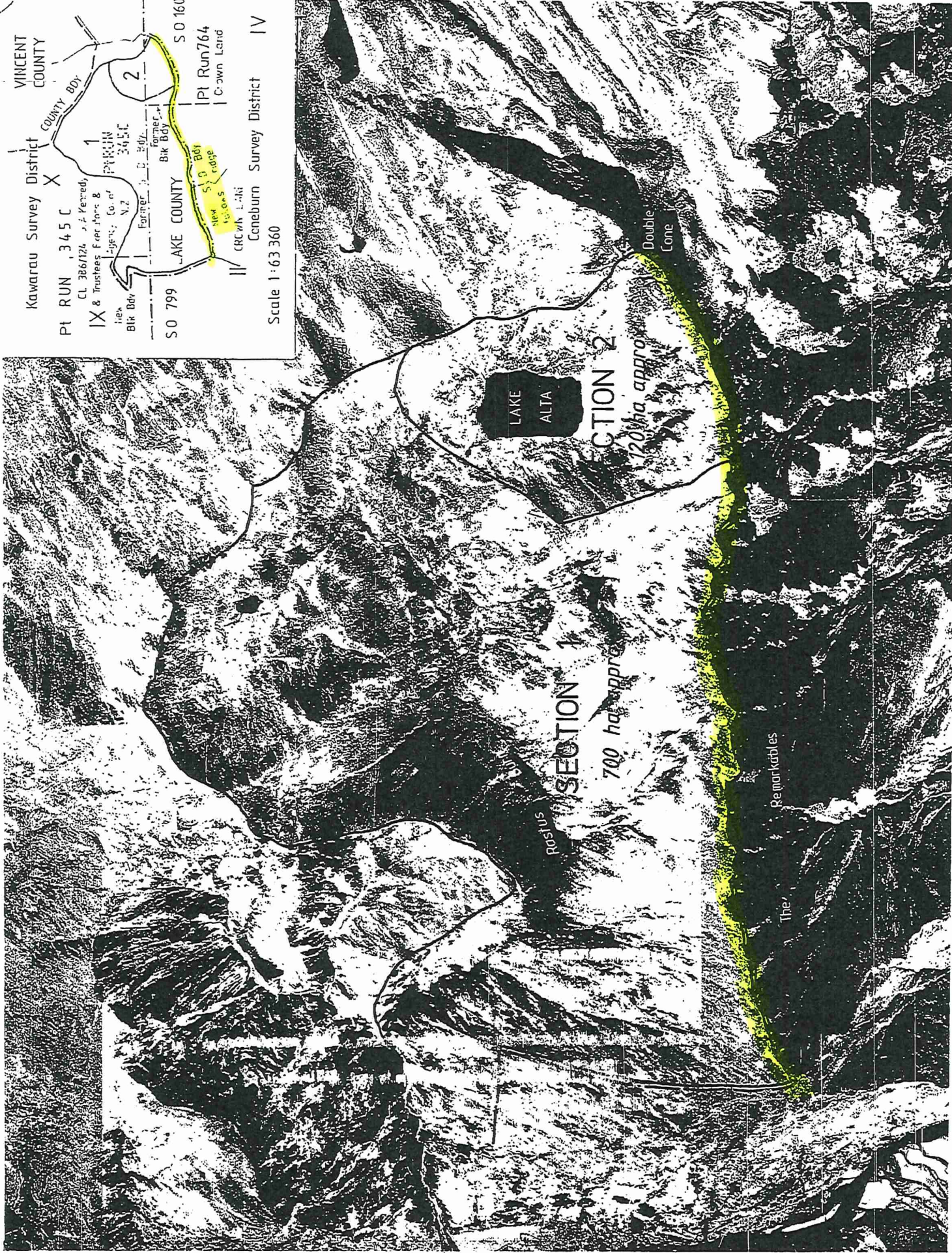
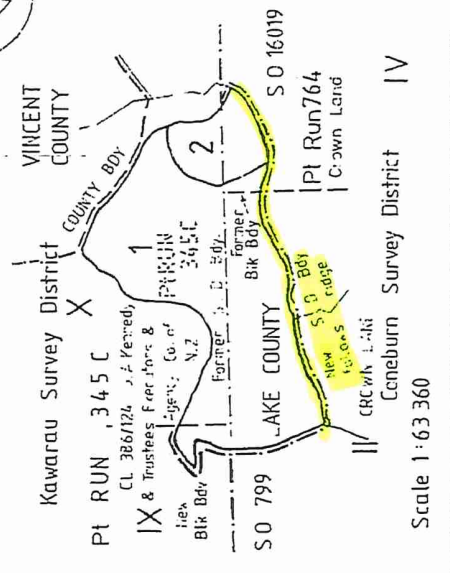
RPL understands that the current submission process is preliminary and would welcome the opportunity for a more detailed discussion about the future management of this important area of land.

Remarkables Park Limited
Queenstown Park Limited
QTN Farm Limited

February 2021



CADASTRAL INFORMATION



COMPILED FROM PHOTOGRAPHIC DATA

LAND DISTRICT OTAGO RM F41:24.34	LOCAL AUTHORITY LAKE COUNTY
SURVEY BLK. & DIST. X KAWARAU	Compiled in Survey Office
NZMS 177 SHEET No. 132	Scale 1:15840 approx Date MAY 1980
261 F41	

FORMER DESCRIPTIONS

Section 1—being part Run 345C, Blocks II and IV, Coneburn Survey District and Blocks IX and X, Kowarau Survey District.
Section 2—being part Run 345C, Block IV, Coneburn Survey District and Block X, Kowarau Survey District.

The boundaries of sections 1 and 2 have been delineated on half tone of photo S132/6/C and are subject to survey

Total Area 820 ha approx
Comprised in CROWN LAND
(Doc 502661/1)

Registered Surveyor and holder of an annual practicing certificate
I hereby certify that this plan has been made from surveys conducted by me or under my direction—that both plan and survey are correct and have been made in accordance with the regulations under the Surveyors Act 1976
Date of this day
of 19
Signature
Field Book p Traverse Book p
Reference Plans S.O. 799 16019 18764
Examined R.L. Young Correct
Approved for Gazetteal purposes only
26 5 80
deposited this day of 19
Chief Surveyor

File 10/4/2798
Received 20-5-80
Instructions
District Land Registrar
SO 19547

NZSki Limited
[REDACTED]
[REDACTED]
[REDACTED]

22 February 2021

John Roberts
Statutory Manager
Department of Conservation
PO Box 811
Queenstown 9348

KAWARAU/REMARKABLES CONSERVATION AREA RECLASSIFICATION CONSULTATION

This submission outlines NZSki Limited's (NZSki's) views in respect of the values of the Kawarau / Remarkables Conservation Area and in particular, the land that surrounds the existing Rastus Burn Recreational Reserve, where The Remarkables Ski Area operates. The submission highlights how this land is highly valued for recreation and how enabling this is consistent with the purpose of conservation land and can be managed to enhance other conservation values.

Background

The Department of Conservation (DOC) is seeking public feedback on the reclassification of the Kawarau / Remarkables Conservation Area. The Kawarau / Remarkables Conservation Area spans some 33,085 hectares and consists of a number of distinctive elements.

The Remarkables Ski Area operates in the Rastus Burn Recreation Reserve to the immediate north-west end of the Conservation Area. The Rastus Burn Recreation Reserve is not included in this consultation process, however the land to the south and east is included and may be relevant for the potential future expansion of The Remarkables Ski Area.

Prior to the establishment of The Remarkables Ski Area in the Rastus Burn Recreation Reserve, The Doolans Basin (to the east) was identified as a potential site for ski area operations due to its very attractive skiing terrain and propensity to accumulate good snow. As a result of the better proximity to the growing population base of Queenstown, these plans were changed, and the ski area opened at its present site in 1985. However, The Doolans remains highly-valued, undeveloped ski terrain consisting of approximately 450 hectares of south-east facing slopes, adjacent to the existing ski area.

To help inform the development of any proposal, DOC commissioned and provided the following reports:

- Ngai Tahu values report
- Landscape values report
- Ecological values report
- Historic heritage report
- Recreational values report

We have considered these values in the context of both the Conservation Act 1987 and the Otago Conservation Management Strategy.

The Conservation Act 1987 defines conservation as *"the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options for future generations."*

The Otago Conservation Management Strategy (CMS) recognises the important role of the ski industry in the Southern Lakes community and rightly takes a precautionary approach to the approval of ski area development. It acknowledges at section 3.25 that ski areas are "popular visitor attractions . . . and have potential for wide-ranging conservation advocacy". The policies within the CMS includes 3.25.1, which states that it "[m]ay allow further development of existing authorised ski fields, where their natural values are already modified, in preference to the development of new ski fields."

NZSki Background

The Remarkables Ski Area operates under DOC permission in the Rastus Burn Recreation Reserve. The Rastus Burn Recreation Reserve is not included in this consultation process, however the land adjacent, in particular The Doolans, is included. As noted earlier, The Doolans is valued terrain by snowsports enthusiasts and offers the potential to increase the capacity of The Remarkables Ski Area to allow for future growth.

NZSki operates three ski areas situated in the Southern Alps of the South Island - Coronet Peak, Mt Hutt and The Remarkables. NZSki is locally owned by Trojan Holdings Limited and is part of a wider business with a strong record of sustainable tourism development with operations also encompassing Aoraki / Mt Cook and the Milford and Routeburn tracks.

Development of commercial ski activities started in the Southern Lakes in 1947 with the construction of a tow rope at Coronet Peak so locals could head up and enjoy the new winter activity of skiing. In the late 1960s it was decided a second ski area in Queenstown was needed to cope with demand and by 1985 The Remarkables Ski Area was opened. There were various foreign and corporate owners before the Davies family purchased NZSki from Air New Zealand in 2002 together with some other local minority shareholders, who have now exited.

The Remarkables Ski Area has 385 hectares of skiable terrain and a 1943 metre top elevation with a 468 metre vertical drop. The ski area appeals to a broad range of the market but is especially favoured by families and the Australian market for its sunny aspect and reliable snow conditions. Over the years NZSki has made substantial investment into the ski area, upgrading facilities and opening new terrain that has improved guest experiences and accommodated the growth in both the local population and visitor numbers. These investments have allowed more people to safely access and enjoy the alpine environment and the Rastus Burn Recreation Reserve.

NZSki operates with an enduring commitment to our environment, people, and communities that ensure they benefit from our presence. We use the principles of kaitiakitanga and manaakitanga to guide us, understanding that our environment is the backbone to our operations and the reason we love what we do. Our promise is to share our passion for the mountains with our people, community and guests, making sure they have an unforgettable experience.

We undertake a range of conservation initiatives to restore and enhance our environment including:

- Operation of a successful and extensive trapping programme to eradicate pests including mustelids and possums
- Established as a platinum partner of the Kea Conservation Trust and over the past few years have seen an increase in the ski area's kea population

- Active programmes to revegetate trails and areas where earthworks have occurred with natives propagated from our mountain environment
- A major native reforestation project on the lower reaches of The Remarkables to restore the natural ecology and provide a more habitable environment for native birds
- Education programmes for our staff, community and guests about kea conservation and the mountain's unique features and native flora and fauna through a variety of channels.

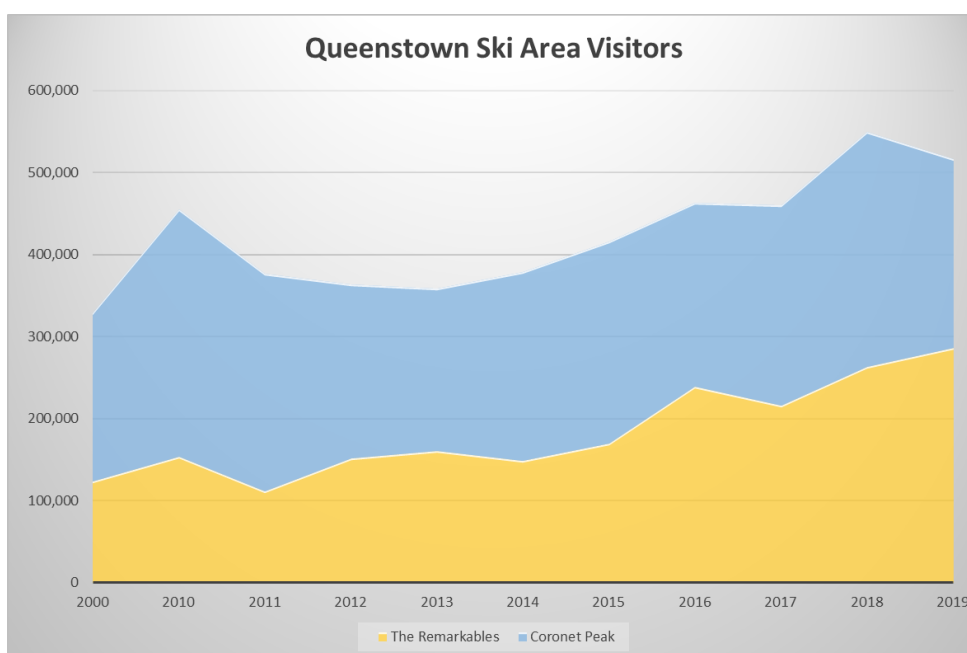
Kawarau / The Remarkables Conservation Area Values

It is clear from the five reports provided that the Conservation Area supports a wide range of cultural, landscape, ecological, historical and recreational values. The operation of The Remarkables Ski Area and the ability to expand its operations into adjacent land provides an opportunity to enhance appreciation for these values.

In terms of possible future expansion of The Remarkables Ski Area to The Doolans, this could more than double the existing ski area terrain and allow for sustainable growth for many years to come. The Doolans is an important expansion for the future of the ski industry in Queenstown due to its higher altitude and therefore ability to retain snow. It could utilise multiple adjacent valleys to open up a larger multi-valley ski resort. The expansion will enable ongoing growth to support recreation opportunities for the growing population of Queenstown and tourism growth over the next 30 years. Operational employee numbers would increase from 450 to more than 900 at The Remarkables to accommodate this growth and downstream economic benefits to Queenstown would be in the order of \$300 million per annum.

Demand for Snowsports as a Recreational Value

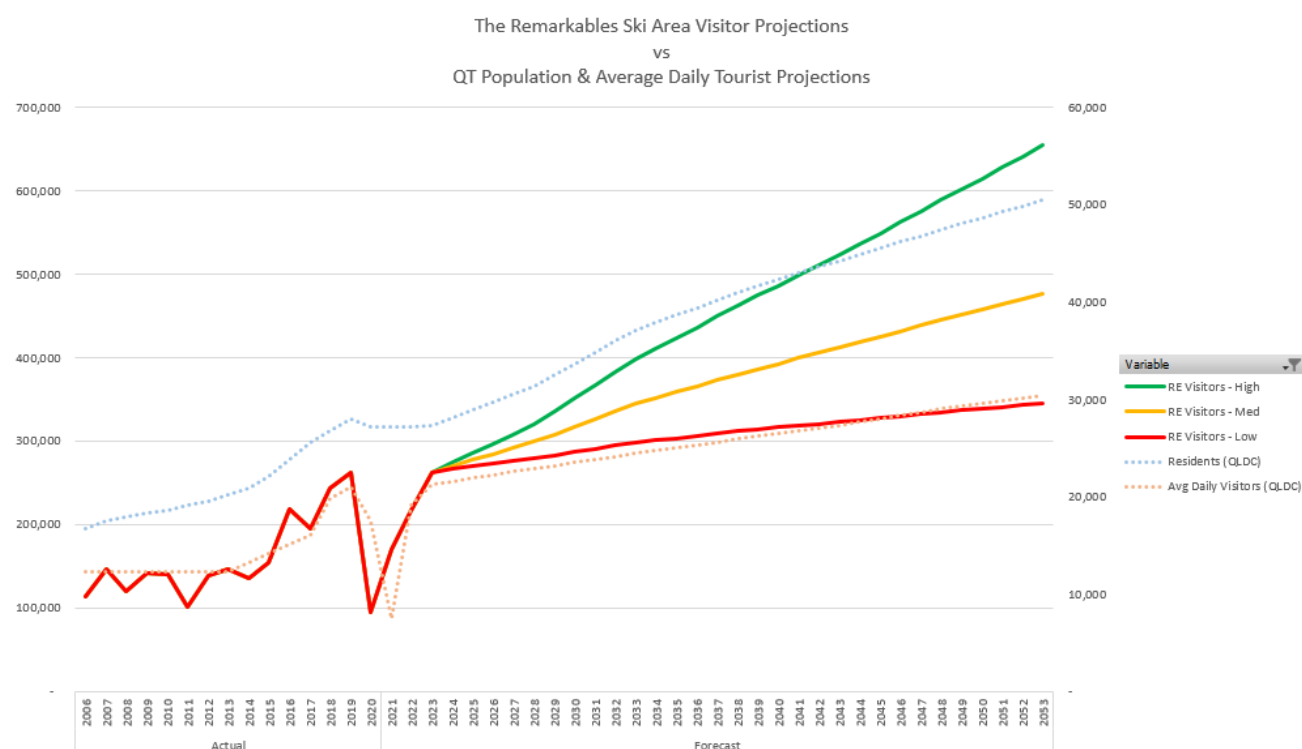
The recreational values report acknowledges the very high recreational values of the Remarkables Conservation Area, especially the northern parts of it that are readily accessible from Queenstown (primarily through The Remarkables Ski Area access road). The chart below shows that between 2013 and 2019, ski area visits to Queenstown ski areas (Coronet Peak and The Remarkables) increased by 44% to 516,780. The Remarkables Ski Area had a disproportionate amount of this growth increasing total visitation to 286,389 in 2019, an increase of 79% over the same period.



The reason for this growth is due partly to the investment made by NZSki to improve facilities and access, but also due to the high altitude of The Remarkables Ski Area (base area 1603m asl) relative to Queenstown's other major ski area, Coronet Peak (base area 1190m asl). With a higher altitude, The Remarkables Ski Area and the land surrounding it, provide a more sustainable option for expanding lift-accessed terrain than other alternatives.

The demand for recreational skiing facilities is likely to continue to grow in the Queenstown district due to ongoing population and tourism growth. The most recent forecasts suggests that Queenstown's population will grow by 80% (from 2019 levels) to 50,467 by 2053. In addition to this, average daily visitors are forecast to increase from 20,983 (in 2019) to 30,377 by 2053. (These population and tourism forecasts were prepared by Queenstown Lakes District Council (QLDC) in September 2020, and therefore include consideration for the impact of COVID-19).

The following chart shows the QLDC's population projections, average daily visitors to Queenstown, and annual visitors to The Remarkables Ski Area. By comparing population and tourism growth to ski visitor growth between 2006 to 2019, we have then used the figures projected by QLDC to estimate annual demand for skier days at The Remarkables in future years. Based on this, NZSki estimates that without expansion, The Remarkables Ski Area will reach its practical capacity of 300,000 annual skier visits within the next ten years. This capacity will be exceeded prior to this in good snowfall years.



Community Benefits from Snowsports

The availability of and access to snowsports provides two major benefits to the Queenstown community. Firstly, the community wellbeing provided by access to the alpine environments for snowsports and associated activities, and secondly, the economic impact from the increase in visitation to Queenstown that the ski areas provide.

The community wellbeing provided by access to the alpine environment and snowsports activities should not be underestimated. Coronet Peak and The Remarkables provide important hubs for community activity

during the winter season, with a large proportion of the local community participating in snowsports activities and gaining wellbeing benefits from such participation. The base buildings at Coronet Peak and The Remarkables are renowned for providing opportunity for strong community connections through social interaction.

As well as these social wellbeing benefits, through analysis of purchase records, we estimate that more than 75% of the population in the Queenstown Lakes District are engaged with snowsports either through participation themselves or their family. The heavily subsidised schools programme operated by NZSki plays host many young people each year. In 2019, NZSki hosted 1,896 primary school children representing 84% of the local primary schools' rolls. The Remarkables also plays host to a range of snowsports, multisport and other recreational events for its local community.

The economic benefit of the ski industry to the Queenstown community is also widely recognised, with ski tourism being consistent with strategies to attract high-value tourists with associated downstream benefits for adjacent industries. The last formal study of the economic impact of the ski industry was completed in 2006 by the New Zealand Tourism Research Institute. Using similar methodology to this study, we estimate that direct spend at Southern Lakes ski areas to be \$85m in 2019, with indirect spend of up to \$220m. This supports in excess of 3,300 jobs in the ski season. Importantly, this economic activity occurs in the winter season, which also supports national and regional efforts to bolster tourism activities outside of the summer peak.

Interaction with other Conservation Values

This submission focuses primarily on recreational values, especially as they pertain to the part of the Kawarau / Remarkables Conservation Area that surrounds the existing Remarkables Ski Area – ie. The Doolans. The slopes of the Doolans that provide the best opportunity for ski area development are the south-east facing slopes, which comprise around 450 hectares or less than 1.4% of the 33,085 hectare land area of the Kawarau / Remarkables Conservation Area.

We believe that the recreational values of snowsports activities can be well managed to enhance other values that have been outlined. As explained below, sustainable development of ski operations can serve to improve other conservation values:

- **Cultural.** The Ngāi Tahu values report contains valuable information regarding historical and contemporary cultural values, practices and associations with the whenua. For some years, The Remarkables has incorporated te ao Māori into its staff inductions. However, with Ngāi Tahu guidance there is further opportunity for NZSki to share this information with ski area patrons in a variety of ways – for example story-telling through digital or interpretation boards. These stories add to the richness of the land and build appreciation and respect from manuhiri.
- **Ecological.** NZSki has a strong track record of protection and enhancement of native flora and fauna. A core operating value is that our environment must benefit from our presence and we have agreed protocols with DOC to govern further development. However, our kaitiakitanga aspirations go beyond this and our efforts in pest eradication, native revegetation and reforestation, weed control (esp. wilding pines) and support for the Kea Conservation Trust demonstrate our commitment to this kaupapa. We have also completed multiple ecological and landscape surveys to ensure we collectively understand more about these values. The extensive work we have completed in the Rastus Burn Recreation Reserve is proof that ski area development can be used to support the enhancement of treasured biodiversity.
- **Historical.** The ski industry is part of the historical heritage of this conservation land and in a similar fashion to cultural values, we can be active in educating patrons on the history of the land. We believe that telling cultural and historical stories about land will strengthen respect for it.

- **Landscape.** The landscape values report identifies ski area development in the upper Doolans as a specific threat to landscape values. We acknowledge that some landscape values, such as remoteness, are impossible to protect with the introduction of increased infrastructure. However, we believe that the relatively small size of the land required for ski area development (around 450 hectares of the 33,085 hectare conservation area) represents an opportunity to significantly enhance recreational values in particular and would enable the effects of the required infrastructure to be closely managed in a tight geographical area. In addition, it allows for the appreciation of the natural beauty of the high alpine environment by a wider range of people than those very few with the physical capabilities to walk or climb to these environments. For example, through the use of the existing ski area infrastructure (road, carparks and lifts), many thousands of people have been able to safely enjoy the magnificence of the Lake Alta alpine cirque basin.

In considering the appropriate classification for the whenua that forms the Kawarau / Remarkable Conservation Area the prominence of different values must be appropriately balanced to ensure the purpose of the Conservation Act is fulfilled. However, such balance should ensure that all conservation values are enhanced when considering the entire 33,085 hectare Conservation Area. The access to the alpine environment that sustainable ski area development provides is invaluable to build recreation values and provides the opportunity to enhance ecological, cultural and historical values. While difficult to completely avoid the impact on some landscape values from the infrastructure required for safe access and management, this impact can be mitigated through careful planning and through the use of relatively small parts of the overall Conservation Area.

Land Classification Recommendation

The status of Recreation Reserve has worked well to protect the natural values associated with the Rastus Burn as well as enhance the recreational values it now offers through The Remarkables Ski Area. This classification has led to a close relationship between NZSki and DOC and has achieved ecological and recreational outcomes that far exceed other land in the Conservation Area, which is generally unmanaged and thus susceptible to pests and weeds eroding native biodiversity. We recommend that The Doolans is afforded the classification of Recreation Reserve to ensure ski area development can proceed with the precautionary approach outlined in the Otago Conservation Management Strategy.

We empathise with calls to designate the entire Kawarau / Remarkables Conservation Area as a National Park and agree that the land contains scenery and ecological systems that are so unique that it can be considered a national taonga. Should this designation be preferred for the whole Conservation Area, we recommend that The Doolans Basin is either excluded or given a classification that enables sustainable ski area development.

Summary

The Kawarau / Remarkables Conservation Area contains a wide range of conservation values and, through proper guardianship, presents an opportunity to protect and enhance these values. NZSki's submission to this reclassification process focuses on the possible future interaction between its operations at The Remarkables Ski Area in the Rastus Burn Recreation Reserve and the adjoining conservation land, especially in The Doolans. It considers this interaction in the context of the values of the wider 33,085 hectare Conservation Area.

There is a very high degree of recreational value offered through the operation of The Remarkables Ski Area to a wide range of people. The benefits range from social and physical wellbeing to economic benefit to the surrounding communities. Despite recent declines as a result of the COVID-19 pandemic, population and tourism growth forecasts suggest that demand for snowsports at the existing ski area will exceed capacity within the next decade. To enable the ongoing enjoyment and recreational value, future land classification

should consider the need for providing additional ski area facilities and terrain adjacent to the existing ski area.

Further development provides opportunities that go beyond recreational value, through active management of ecological outcomes and increased exposure of visitors to cultural and historic values of the land. In addition, infrastructure to enable safe year-round access provides the opportunity for a wider range of people to experience the outstanding landscape values. The required infrastructure can be isolated to very small parts of the 33,085 hectare Conservation Area, thus minimising any visual or remoteness diminution.

The classification of this Conservation Area with safeguards in place for both conservation and appropriate ski area development provides the opportunity for a fair and collaborative approach between different interests to the whenua in a way that will provide benefits for many decades to come.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Paul J Anderson
Chief Executive Officer
NZSki Limited

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Gwyn Thurlow
Organisation (if applicable):	New Zealand Deerstalkers Association Inc (NZDA)
Role (if applicable):	CEO and General Counsel
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

The proposal to reclassify the Kawarau/Remarkables Conservation Area (the Area).

Our submission is (include the reasons for your views)

The NZDA advocates on behalf of New Zealand's recreational hunters and shooters. Our fundamental purpose is to ensure the rights of recreational hunters in New Zealand are protected, advanced and advocated for in the best interests of sportsmen and sportswomen.

The NZDA submits that the area is reclassified as either (in order of preference):

3. Conservation Park under the Conservation Act 1987; or
4. National Reserve under the Reserves Act 1977.

Our concern is that the area remains available for recreational use, especially for hunting and shooting activities such that DOC continues to facilitate public recreation and enjoyment of the area. This is because the Remarkables Conservation Area is an area important for big game animal (deer) hunting (deer) and valued as a great hunting resource close to a large population centre and several NZDA branches:

- Southern Lakes (Queenstown)
- Upper Clutha (Wanaka)
- North Otago (Omarau)
- South Canterbury (Timaru)
- Palmerston
- South Otago (Balclutha).

Whilst we generally support a review of its status as stewardship land, **NZDA objects to the area**



becoming a National Park because deer and big game would be removed. If made into a National Park, this would mean no access for dogs used for hunting and the future of the deer, as a viable hunting resource, would also expressly be at risk. In particular, NZDA, as a long-standing hunter advocate, is well aware of the result of the imposition of National Park status because of the operation of Section 4, 2(b) of the National Parks Act 1980, which states:

"the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated"

The NZDA submits that the area must be designated such that the area will be reasonably accessible and useable by recreational hunters for future generations.

Further reasons supporting our submissions – which support both our recommended status, and our objection to a national park status:

1. **Hunters are high recreational users of the area:** (as well as fishermen, motorised bikers, 4WDs, horse riders, etc) Food gathering activities would be restricted, or access and valued introduced species diminished to render the activities not feasible, if made a National Park, especially because introduced animals would be required to be removed by the Department; but would continue to be present under a Conservation Park or National Reserve status.
2. **Adjacent tenure review shows no 'national interest' justifications:** The Remarkables Conservation Area, as Ben Nevis station, went through a tenure review process in 2011 and the report does not identify "National Park type values".

To become a National Park the Act states in its principles section 4 (1) that:

"areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest."

From reading the information at the tenure review process there are no biodiversity assessments stating any of the above, nor is the area distinctive in its quality or uniqueness, especially when compared to the current quality of our National Parks – the area is simply not in the same league.

DOC should work with Fish & Game and the NZ Game Animal Council

The NZDA encourages the Department work with other relevant statutory bodies - Fish & Game and the Game Animal Council – who should seek input as affected parties and interests.

Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

(signed)

Gwyn Thurlow

Printed name of submitter or person authorised to sign on behalf of submitter

B



Date 25 February 2021

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop the completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.



1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

The potential for reclassification of this Conservation Area to inhibit access for bicycle based recreation now or into the future.

My submission is (include the reasons for your views)

What further information sources should we consider in this reclassification?

<p>Queenstown Mountain Bike Club (QMTBC) would like to discuss this in person with DOC.</p> <p>QMTBC also believe the current submissions to the Otago CMS need to be considered and the aspirations of our region which is extremely passionate about exploring our amazing country by bicycle must be considered.</p> <p>Other information sources which must be considered are DOC's own website and other publications which clearly discuss the positive impacts of allowing bicycle based recreation and these positive impacts must be fully accounted for in any assessments.</p>

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

Printed name of submitter or person authorised to sign on behalf of submitter

__26/2/21_____
Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	
Organisation (if applicable):	
Role (if applicable):	
Email:	
Phone:	
Address:	

* I confirm I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

All five values reports and general map

My submission is (include the reasons for your views)

The Fiordland Tramping and Outdoor Recreation Club (FTORC) represents the interests of over 50 Southland resident members who engage in tramping, conservation, cycling and kayaking activities in Southland and Otago, and occasionally other regions. The club recently celebrated its 40th jubilee. Some members are resident outside the Southland region. Members are of mixed age and recreational ability and skill.

FTORC supports the reclassification of the Kawarau/Remarkables Conservation Areas from Stewardship land to a higher protection status such as Reserve or National Park.



Department of
Conservation
Te Papa Atawhai

New Zealand Government

<p>The reports document the qualities of the Kawarau / Remarkables Conservation Areas. FTORC's opinion is that Stewardship status gives inadequate legal protection to the qualities of this area, and therefore a reclassification is justified.</p>
<p>FTORC supports the recommendations made in the Parliamentary Commissioner for the Environment Report <i>Investigating the Future of Conservation The Case of Stewardship Land August 2013</i> and the associated <i>Update April 2015</i>. FTORC is pleased to see DOC acting on these recommendations, and supports this initiative by DOC both in general and in relation to the area of this consultation.</p>
<p>New Zealand is well represented by mountainous National Parks in what could be described in a national context as higher rainfall habitats. Although the Kawarau / Remarkables Conservation Areas are modified landscapes where original indigenous forest is now largely absent, in the long term it is feasible it could be restored. This would create the potential for a mountainous National Park in a relatively dry climate area of New Zealand, a land type that is under represented in the New Zealand National Parks system.</p>
<p>The lower precipitation of the Kawarau Remarkables Conservation Areas makes them attractive for outdoor recreation. This is of interest to outdoor recreationalists who live near wetter Southland and Otago recreation areas.</p>
<p>The Kawarau / Remarkables Conservation Areas are readily accessible to a number of population centres in the lower South Island: Wanaka, Queenstown, Cromwell, Alexandra, Dunedin, Gore, Invercargill, Te Anau. With population growth in many of these centres the demand for the protection of Conservation Areas for both conservation and recreation will increase. Reclassification of this area will recognize and support this demand.</p>
<p>Reclassification of the Kawarau / Remarkables Conservation Areas affords the opportunity in the future to link a sequence of variable dry upland landscapes from The Remarkables, through the Hector Mountains to the Garvie Mountains, especially given the current Glenaray Whitecomb Crown Pastoral Land Tenure Review. There is potential for nationally significant conservation and public recreation gains to be made by higher legal protection to current Stewardship and Leasehold land in this part of the Lower South Island. This higher protection could further include The Old Woman Range, Old Man Range and Umbrella Mountains.</p>
<p>FTORC was unable to meet the submission deadline for this consultation. This submission is one day late. FTORC requests that DOC include FTORC on any correspondence list concerning future consultation on the reclassification of the Kawarau / Remarkables Conservation Areas. Thank you for the opportunity to make this submission.</p>

What further information sources should we consider in this reclassification?

<i>Investigating the Future of Conservation The Case of Stewardship Land Parliamentary Commissioner for the Environment August 2013</i>

<i>Investigating the Future of Conservation The Case of Stewardship Land Update Parliamentary Commissioner for the Environment April 2015</i>

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:

Printed name of submitter or person authorised to sign on behalf of submitter

27 February 2021

Date

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.

1. Kawarau/ Remarkables Conservation Areas reclassification consultation submitter information

Name:	Helen Forsyth
Organisation (if applicable):	HeliBike New Zealand Limited
Role (if applicable):	Manager
Email:	[REDACTED]
Phone:	[REDACTED]
Address:	[REDACTED]

☐ I wish to keep my contact details confidential

2. Submission/Provision of further information

The specific parts of the application that this submission relates to are:

<ul style="list-style-type: none">• Recreational Values
<ul style="list-style-type: none">• Section 6. Public Access Points
<ul style="list-style-type: none">• Section 8.5 Mountain Biking

My submission is (include the reasons for your views)

Section 6.
It is important that any considerations to reclassify this conservation ensure that ongoing public access is retained and where practically possible this is enhanced.
This public access should be provided for year round – permitted farming operations permitting – and free of charge.

What further information sources should we consider in this reclassification?

Queenstown Mountain Biking Club's 2018(?) Economic Impact Report on Biking.

This provides an excellent understanding, a little bit outdated now, on the extent of the businesses and local community that benefit from the participation and visitation that bikers have on the local economy.

As I am not the owner of this document I will not include it in this submission – I suspect you have it – but if not, I recommend you contact the Queenstown Mountain Biking Club for a copy of it.

3. Your Signature

Signature of submitter or person authorised to sign on behalf of submitter:



Printed name of submitter or person authorised to sign on behalf of submitter

Helen Forsyth

Date

1 March 2021

Please download and complete this form, return to kawarau@doc.govt.nz. You may also mail your submission to: Kawarau/ Remarkables Conservation Areas Reclassification, Department of Conservation, PO Box 811, Queenstown 9348 or drop completed submission into Queenstown or Dunedin DOC office **by 26 February 2021**.