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22 July 2022

Department of Conservation

Dear Sir/Madam

**Submission on Decisions on Stewardship Land Reclassification**

Thank you for the opportunity to provide comment on the proposed reclassification proposals for Stewardship Land within the West Coast Conservancy.

The three West Coast District Councils (Buller, Grey and Westland), and the West Coast Regional Council (WCRC or the Council) have made a joint submission, which is attached. A joint submission is appropriate given the extent of Department of Conservation land holdings on the West Coast; and the four Councils are working together with mana whenua to give effect to the purpose of local government, including the preparation of a combined District Plan - Te Tai o Poutini Plan - for all three Districts under an Order in Council.

The West Coast/Te Tai o Poutini differs from most of New Zealand as it is fortunate to have an abundance of diverse and intact indigenous ecosystems and vegetation types.

We note that the Councils are not opposed to protecting, maintaining or restoring land for conservation purposes in principle. However, the Councils strongly believe, aside from the mana whenua reclassifications, that full socio-economic assessments must be undertaken in partnership with the Councils prior to reclassifications being progressed.

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We would be grateful for acknowledgement of receipt of our submission.

Yours faithfully

Heather Mabin  
Chief Executive Officer

# **West Coast Council's Joint Submission on the Stewardship Land Reclassification – West Coast Conservancy**

## **Summary of Feedback**

### **The West Coast Regional Council and the Buller, Grey and Westland District Councils:**

1. Support the recommendations of the mana whenua Panel for reclassifications to local purpose reserves, conservation parks, scenic reserves, wildlife management areas or retention as Stewardship Land on the basis of specifically identified cultural and historical values;
2. Support the recommendations by either Panel to dispose of Stewardship Land in some instances;
3. Oppose all other reclassifications of Stewardship Land to specially protected areas under the Conservation Act, National Parks Act, or reserves under the Reserves Act (unless the land in question was specifically purchased by the Nature Heritage Fund for the purpose of adding it to a national park);
4. Support the rationale for Recommendation 3 for full socio-economic assessments to be done in partnership with the Councils prior to reclassifications being progressed;
5. Request that the Department of Conservation (the Department) consult with existing permission or concessions holders, mining permit holders, or occupiers of land prior to making a final recommendation; and
6. Reiterate their concerns about process and limited scope of the assessments made in the earlier submission.

The Council's repeat their request for a meeting with Minister Williams to discuss the points raised in the submission and the Council's concerns with the process.

## Introduction

The four West Coast Councils (the Councils) appreciate the opportunity to submit on the recommendations for reclassification of Stewardship Land in New Zealand.

In March 2022, the Councils lodged a submission on the discussion document dated November 2021, which presented options to streamline processes for reclassification and disposal of Stewardship Land (see Attachment 1). The Councils requested a meeting with the Minister to discuss the issues raised in the March 2022 submission.

The Councils note this invitation was not accepted by the Minister.

Further we note that the Councils are not opposed to protecting conservation values on Stewardship Land in principle. However, the Councils are deeply concerned that reclassification of some areas of land will adversely affect West Coast ratepayers. For the reasons set out in the following submission, the National Panel recommendations fail to have proper regard to the conservation, economic and social context within which stewardship land is administered by the Department on behalf of all New Zealanders. This includes the potential use of Stewardship Land to support the West Coast's resilience and adaptation to climate change.

The National Panel recommendations also fail to acknowledge the Government's stated intention to review all conservation legislation and national policy as a priority. Proceeding with the National Panel recommendations for reclassification of large areas of land in advance of that review risks undermining, or being inconsistent with, the more fundamental review of the Conservation Act and other relevant legislation. Progressing the West Coast review in advance of other Conservancy areas further exacerbates this inconsistency as the West Coast Conservancy will have been considered under different legislation to the rest of New Zealand.

As stated in the discussion document submission, large scale reclassification recommendations should not be progressed until the criteria for reclassification has been considered on a national basis. There is no compelling reason to rush the reclassification process now. Resources would be better spent first on a strategic review of conservation legislation and policy, of which Stewardship Land is an important component.

The 2005 Conservation General Policy, and Policy 6, should be the subjects of a fundamental review as part of the overall review of conservation legislation. Whole-scale reclassifications of Stewardship Land which contain more than very low conservation values should not proceed until such a review is finalised.

The Councils consider that a test for reclassification of Stewardship Land having 'no or very low conservation values' is no longer fit for purpose. Consequently, the Councils generally oppose a streamlined process which further enables the Panels to apply such a test in reclassifications.

The Councils consider that a strategic approach should be taken when determining what level of statutory protection should be provided to different types of ecosystems in different ecological districts and regions. If that were done, decisions about how much Stewardship Land might therefore be available for exchange or disposal could be made within that broader context.

There is an unstated assumption in the paper that all land with more than very low conservation values should be held as specially protected areas under the Conservation Act because that will give that land 'better protection'. The Councils consider that such an assumption is unwarranted and unsupported. On the West Coast there are currently large areas of existing conservation land which the Department does not have the resources to effectively manage for animal pests and weeds.

In the context of the forthcoming general review, changes should be made to the Conservation General Policy (and the Conservation Act if necessary) which would require the Panels to have regard to:

- (a) the social and economic benefits of Stewardship Land with more than low conservation values becoming private land by way of disposal or exchange;
- (b) the means by which conservation values can be protected and enhanced if the land is exchanged or disposed of;
- (c) the value of any Crown owned minerals in the Stewardship Land as part of the reclassification process (in a similar manner to s61(6) of the Crown Minerals Act); and
- (d) the cultural, economic and social values of mana whenua.

The Conservation General Policy (and the Conservation Act if necessary) should be amended to reverse the unanticipated result of the Supreme Court's decision in the Ruataniwha case that an exchange is deemed to be a disposal and therefore can only occur where there is not the potential for greater than very low conservation values.

Neither the Department, nor the Minister, has released a summary of submissions on the consultation paper, nor has the Government signalled any response to the submissions.

Earlier this month, the Department of Conservation publicly announced proposed reclassifications of 504 parcels of Stewardship Land on the West Coast. Councils have had to consider conservation value reports in order to make a submission. There are 290 reports, each providing a description of the individual piece of Stewardship Land, including its size and location. These reports have information limited to the ecological values, recreational values, heritage values, permissions and cultural values and interests of the area. There are no descriptions or narrative of how these land parcels link to the larger ecological or recreational areas. Instead, information is limited to some discussion on ecosystems, and on the effects of the reclassification on existing interests in the area.

We note that information presented by the Department is by no means exhaustive.

## About the Submitter

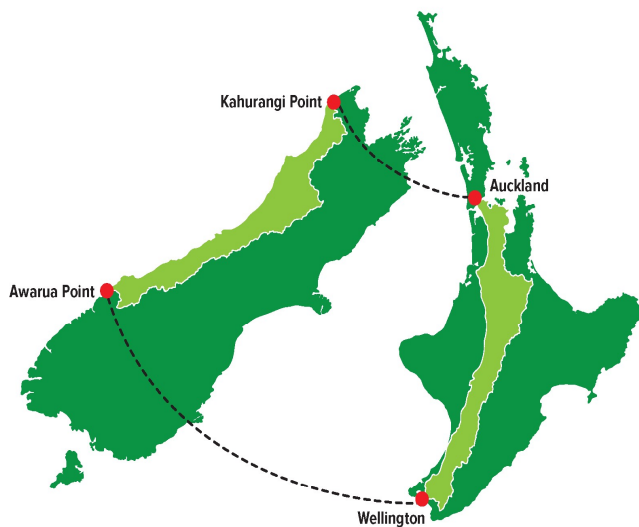
The West Coast Regional Council (WCRC) is the local authority, and the three District Councils are the territorial authorities in a region covering a vast area with a sparse population. Extending from Kahurangi Point in the north to Awarua Point in the south, this is the approximate distance from Wellington to Auckland. The West Coast is predominantly rural.

Te Rūnanga o Ngāti Waewae and Te Rūnanga o Makaawhio (Poutini Ngāi Tahu – PNT) are mana whenua of Te Tai o Poutini (the West Coast). The WCRC's Mana Whakahono ā Rohe (Resource Management Act - Iwi Participation Arrangement) captures the intent of the WCRC and Poutini Ngāi Tahu to progress our relationship in accordance with the Treaty of Waitangi partnership between iwi and the Crown.

The WCRC and the three territorial authorities (the Buller, Grey and Westland District Councils) work closely together. Outside of the main towns of Westport, Greymouth, Reefton and Hokitika, the region's relatively small population of approximately 32,600 is spread across smaller settlements and rural communities. It is important that central government priorities for protecting, maintaining and restoring indigenous biodiversity are relevant to our unique region, and beneficial to the social, economic, and cultural well-being of all West Coast communities and the natural environment.

The Conservation Estate comprises 84.17% of the West Coast land area, with an additional 1.55% administered by Land Information New Zealand (LINZ). Conservation Estate is not rateable land, therefore it does not contribute to local economy in the Region.

*Figure 1: Map of New Zealand to highlight 600km length of West Coast Region compared to distance between Auckland and Wellington*



**The West Coast region stretches the equivalent distance of that between Auckland and Wellington**

## Impacts of National Panel Recommendations on West Coast landowners

The Councils are concerned that the changes in land status will change the ability for the Department to grant access over land with each of those new classifications, for uses other than conservation, or to otherwise deal with the land.

Legal advice suggests that despite the same legal tests applying, it is likely to be more difficult to obtain concessions or access arrangements for commercial activities on specially protected conservation areas than it is for such activities on Stewardship Land. This further forecloses the ability to undertake economic activity on the West Coast, which is already constrained due to the limited availability of public land.

Only Stewardship Land is available for exchange under s16A of the Conservation Act(s16A). Specially protected conservation areas cannot be exchanged, although it is possible to exchange most types of reserves held under the Reserves Act. (The Conservation Authority has recommended that exchanges be allowed for most specially protected areas – dependent on the specific values which an area in question has).

Parts of specially protected areas cannot be exchanged under s16A. Specially protected areas can be reclassified as stewardship areas (and therefore available for exchange under s16A) only if the land in question no longer has the conservation values for which it was classified.

An increasing number of wetlands and indigenous bush/forest areas on private land are being impacted through new land use and development restrictions enforced through central government policy and regulation, such as the National Policy Statements for Freshwater Management, Indigenous Biodiversity, and the National Environmental Standard for Freshwater. The identification and protection of freshwater and terrestrial Significant Natural Areas (SNAs) on private land under the Resource Management Act further reduces the availability of private land for economic, social and cultural use and development.

Various studies boast of the economic benefits SNAs contribute to the tourism sector. This is of little relevance for the Councils when 84% of the West Coast is already public conservation land (PCL). The Councils do not believe that the additional 7% of bush on private land that would be contributed through the SNA protection would make any real difference to tourism values.

With Government support through funding initiatives such as the Tai Poutini Regional Growth Study and Action Plan, and the Provincial Growth Fund, the West Coast has had tourism promoted as the panacea of the region as various Governments have embraced a move away from traditional industries such as minerals extraction. However, the global pandemic turned off the international 'tourist tap' virtually overnight at significant detriment to this region. It is likely to take many years before the tourism economy returns to pre-Covid numbers, if it ever does. Eco-tourism ventures on Public Conservation Land are a limited source of income, and do not provide certainty or diversity for our regional economy.

Other regions have a more diverse local economy with a range of industry stimulating economic activity. Economic sectors on the West Coast are facing climate adaptation requirements, agricultural restrictions through the Freshwater Package and requirements to protect indigenous biodiversity on private land, further restricting productive opportunities.

There is a question of equitable fairness across the nation. Most regions throughout New Zealand have benefitted economically from clearing vast proportions of their natural areas over time. However, due to the topography, isolation, settlement patterns and other factors, the West Coast did not experience the same level of development and native vegetation clearance. Now the region is economically penalised as the importance of such areas is recognised nationally and legislation and restrictions around development are implemented. This is an example of Central Government's rollout of standardised policy changes across Aotearoa and when one size does not fit all, especially the West Coast.

The West Coast Councils particularly support Federated Farmers and our local run holders' submissions. Although these grazing run situations will differ depending on the land parcel, there appears to be a general concern that grazing runs and national parks do not go together. We, the Councils of the region, disagree.

It is a risk for landholders when grazing runs are reclassified, as in some instances, the concessions holder will not be allowed a renewal to graze. Grazing lease terms have been reduced since DOC was formed. In 1987, the term was 5+5+5 years. Now, land concessions are renewed for only 5+5 years. This gives limited certainty to the runholders farming on remote 'river run' blocks, and in many instances this has been a multi-generational occurrence. By changing this, the government is impacting the cultural and economic basis of our communities. It is worth noting that grazing concessions and leases are historic. Some are still in original settler families with concessions taken over by successive generations.

The Stewardship Land recommendations also affect existing concession and access arrangement holders who require long term certainty for business planning. This includes:

- helicopter operators undertaking tourism and other activities, including pest control on public conservation land;
- primary industries including moss pickers;
- access to private landholdings for agriculture or forestry;
- apiarist access to beehives;
- quarry operators that may supply rock for roading, the rail network, buildings and flood protection infrastructure;
- miners as well as concessionaires and grazing run holders; and,
- the West Coast Regional Council's monitoring equipment located on land administered by the Department which is necessary for flood warning for communities.

Table 1 below outlines the current permissions which may be affected by reclassification recommendations.

*Table 1: Summary of current permissions on stewardship land on the West Coast*

Summary of current permissions on Stewardship Land on the West Coast

| Permission type              | Number of permissions | Permission duration   |
|------------------------------|-----------------------|---|
| Access arrangement           | 125                   | Linked to permits under the Crown Minerals Act. Varied timeframes apply |
| Grazing concession           | 175                   | Up to 10 years  |
| Easement concession          | 56                    | Up to 30 years in most cases, may be up to 60 years                     |
| Beehive concession           | 4                     | Up to 10 years  |
| Structure concession         | 66                    | Up to 30 years  |
| Gravel extraction concession | 46                    | Up to 10 years  |
| Guiding concession           | 4                     | Up to 10 years  |
| Aircraft concession          | 4                     | Up to 10 years  |
| Telecommunications sites     | 38                    | Up to 10 years  |
| Accommodation concession     | 46                    | Up to 30 years, may be up to 60 years                                   |
| Storage concession           | 1                     | Up to 30 years  |
| Wild animal control          | 10                    | Up to 10 years  |
| <b>Total</b>                 | <b>575</b>            |   |

The Councils also note there are some instances of Stewardship Land occupation or Stewardship Land being used for access with no formal permissions in place. The Council's urge that the Department discuss any existing formal or informal arrangement with the land occupier prior to making recommendations.

The Councils are concerned that the Conservation General Policy may foreclose current uses on some areas that are reclassified. Conservation Management Strategies under the Conservation Act must implement the Conservation General Policy. A concession can only be granted if it is consistent with the relevant conservation management strategy prepared under the Conservation General Policy. In considering an access arrangement application for mining activities, the Minister must have regard to the Conservation General Policy (see Attachment 3 for a copy).

For all activities in national parks, the General Policy for National Parks applies rather than the General Policy for Conservation. This General Policy is issued by the Conservation Authority rather than the Minister. The Conservation General Policy and the General Policy for National Parks, are therefore critical policy documents in determining whether an access arrangement or a concession can be granted, and whether Stewardship Land can be exchanged or disposed of. In some instances, access provisions may not comply with the relevant strategy or the Conservation General Policy. This means access will legally be severed and, in many cases, an alternative may be unavailable.



The Councils also note that recommendations did not take into account community climate adaptation and resilience value. There are many sites that may give value in the short and long term for climate adaptation and mitigation. It is noted the Department of Conservation Climate Change Adaptation Action Plan does not mention the role Stewardship Land could play in assisting community climate adaptation.

## Submission Feedback

### **The West Coast Regional Council, Buller District Council, Grey District Council and Westland District Council (the Councils):**

1. Support the recommendations of the mana whenua Panel for reclassifications to local purpose reserves on the basis of specifically identified cultural and historical values;

The Councils support the mana whenua recommendations where there has been identification of specific cultural and historical values, but oppose all other reclassifications proposed by the Government-appointed Review Panel on the basis that no reclassifications should proceed without a full socio-economic assessment being made by the Department in partnership with the Councils.

2. Support the recommendations by either Panel to dispose of Stewardship Land;

The Councils support the disposal options agreed by the two Panels as there is agreement that none of this land holds conservation value. It is noted by the Councils, that the disposals form only 0.01% of the land area under consideration as part of this process.

The Councils draw the Panel's attention to the list in Attachment 2, which was considered as part of this review.

3. Oppose all other reclassifications of Stewardship Land to specially protected areas under the Conservation Act, National Parks Act, or reserves under the Reserves Act (unless the land in question was specifically purchased by the Nature Heritage Fund for the purpose of adding it to a national park); and
4. That the rationale for Recommendation 3 is for a full socioeconomic assessment to be undertaken in partnership with the Councils prior to reclassifications being progressed.

The proper reclassification, disposal, or exchange of Stewardship Land is a significant issue impacting on the environmental, economic, social and cultural wellbeing of the West Coast and all of our communities.

In general terms, the Councils are supportive of measures to streamline the process for the reclassification, exchange and disposal of existing Stewardship Land. However, for the reasons set out in this submission, the Discussion Document fails to have proper regard to the conservation, economic and social context within which Stewardship Land is administered by the Department on

behalf of all New Zealanders. This includes the potential use of Stewardship Land to support the West Coast's resilience and adaptation to climate change.

Large-scale reclassifications should not be progressed until the criteria for reclassification have been reconsidered. Unless the criteria are amended to enable these wider considerations to be taken into account, there is no compelling reason to adopt the reclassification recommendations, notwithstanding the Government's desire for speed. Resources would be better spent first on a strategic review of conservation legislation and policy, of which Stewardship Land is an important part.

Having said that, the Councils agree that the Panels can perform an important role in the meantime, and that certain changes to the reclassification process can usefully be made. The Councils wish to highlight the importance of finding the right balance by ensuring that there is no further decline in economic, social or cultural wellbeing on the West Coast.

5. Reiterate their concerns about process and limited scope of the assessments made in the earlier submission.

The Council's March 2022 submission is attached to this submission as Attachment 1.

This ends our feedback.

**Attachment 1**

Submission on Stewardship Land in Aotearoa New Zealand discussion document:

Options to streamline processes for reclassification and disposal. March 2022

## Attachment 2

List of Department land in Westland not included in review

| OBJECTID | NaPALIS_ID |                             | Section                 | Rec_Area_ha | TLA      |
|----------|------------|-----------------------------|-------------------------|-------------|----------|
| 6583     | 2806541    | Lake Brunner                | s.25 - Stewardship Area | 4079.202    | Grey     |
| 5685     | 2805267    | Okarito Bach (Part)         | s.25 - Stewardship Area | 0.0718      | Westland |
| 5686     | 2805268    | Okarito Bach (Part)         | s.25 - Stewardship Area | 0.0278      | Westland |
| 3572     | 2801098    | Waiatoto Valley             | s.25 - Stewardship Area | 3165.331    | Westland |
| 3526     | 2800926    | Knights Point               | s.25 - Stewardship Area | 0.7586      | Westland |
| 3454     | 2800620    | Area                        | s.25 - Stewardship Area | 30          | Westland |
| 6188     | 2806239    | Hokitika Area Workshop      | s.25 - Stewardship Area | 0.2513      | Westland |
| 8136     | 2801489    | Arawhata                    | s.25 - Stewardship Area | 102274.7    | Westland |
| 3802     | 2801490    | Arawhata Riverbed           | s.25 - Stewardship Area | 2985.608    | Westland |
| 3804     | 2801492    | Lake Ellery                 | s.25 - Stewardship Area | 372.3108    | Westland |
| 9775     | 2801480    | Arawhata                    | s.25 - Stewardship Area | 9115.84     | Westland |
| 3609     | 2801158    | Adair Road, Haast           | s.25 - Stewardship Area | 0.0776      | Westland |
| 3610     | 2801159    | Haast Field Centre Workshop | s.25 - Stewardship Area | 0.288       | Westland |
| 5503     | 2805008    | Sandy Beach - Jacobs River  | s.25 - Stewardship Area | 11.2296     | Westland |

## Attachment 3

### The role of Conservation General Policy and General Policy: National Parks

1. Statements of general policy (known as Conservation General Policy - CGP) are issued by the Minister under the Conservation Act.
2. The Supreme Court in the Ruataniwha Dam case decided that, because of the way the Conservation General Policy under the Conservation Act is worded, an exchange of land under s16A is defined as a type of 'disposal' of land. Under the General Policy 6 an exchange or a disposal can only happen where the land has "no, or very low, conservation values". In 2016, the Conservation Authority recommended to the Minister that she change the Conservation General Policy to re-establish that exchanges of Stewardship Land can take place where there is an overall 'net gain'.
3. Changing the CGP is a publicly notified process, but the Minister is the final decision maker.
4. Conservation management strategies under the Conservation Act must implement the Conservation General Policy. A concession can only be granted if it is consistent with the relevant conservation management strategy. In considering an access arrangement application for mining activities, the Minister must have regard to the Conservation General Policy.
5. For all activities in national parks, the General Policy: National Parks applies rather than the General Policy: Conservation. This General Policy is issued by the Conservation Authority rather than the Minister.
6. The Conservation General Policy and the General Policy: National Parks are therefore critical policy documents in determining whether an access arrangement or a concession can be granted, and whether Stewardship Land can be exchanged or disposed.
7. The following is a summary of relevant policies from the General Policy: Conservation, the General Policy: National Parks, and the West Coast Conservation Management Strategy.

### Conservation General Policy 2005 – activities requiring authorisation policies

#### 11.1 All activities

- 11.1 (a) *Any application for a concession or other authorisation will comply with, or be consistent with, the objectives of the relevant Act, the statutory purposes for which the place is held, and any conservation management strategy or plan.*
- 11.1 (b) *All activities on public conservation lands and waters which require a concession or other authorisation should, where relevant, avoid, remedy or mitigate any adverse effects (including cumulative effects) and maximise any positive effects on natural resources and historical and cultural heritage, and on the benefit and enjoyment of the public, including public access.*

#### 11.2 Grazing and farming

- 11.2 (a) *The following criteria should be applied when considering applications for grazing and farming concessions:*
- i. *the land is in existing pasture or farming use;*

- ii. *the number and type of stock are suitable for the location and land type;*
  - iii. *grazing animals can be effectively controlled;*
  - iv. *any adverse effects of stock on waterways, wetlands and riparian zones can be avoided or otherwise minimised;*
  - v. *there are no adverse effects on wāhi tapu;*
  - vi. *there is no risk of erosion caused by grazing or farming;*
  - vii. *the need to use grazing for management purposes;*
  - viii. *the potential for restoration is not compromised; and*
  - ix. *public access is maintained.*
- 11.2 (b) *Grazing concessions should be issued for a fixed period and market rentals should be paid.*

#### **11.4 Crown minerals and pounamu**

- 11.4 (a) *All applications for access arrangements to minerals on public conservation lands and waters will be considered under section 61(1A), where applicable, and section 61(2) of the Crown Minerals Act 1991.*
- 11.4 (b) *Access arrangements for the removal of pounamu from public conservation lands and waters within the takiwā of Ngāi Tahu will be considered only where the applicant has authorisation for collection from the kaitiaki rūnanga of Te Rūnanga o Ngāi Tahu.*
- 11.4 (c) *Conservation management strategies and plans will identify where sand, shingle or other natural mineral material can be removed from the bed of a lake or river or foreshore, consistent with the protection of natural resources and historical and cultural heritage values.*

### **West Coast Conservation Management Strategy 2010 – activities requiring authorisation policies**

#### **General**

1. *The cumulative effects of other authorities for use, issued in respect of a particular area or opportunity, should be taken into account when considering new applications for those areas or opportunities.*
2. *When approving concessions or other authorisations, specific conditions may be applied as deemed appropriate.*
3. *The Department should periodically monitor compliance with authorisation conditions.*
4. *The Department should apply the ‘Concession allocation in limited supply situations guideline’, developed in conjunction with the Ministry of Tourism and Tourism Industry Association New Zealand, in order to ensure the best outcome is achieved for natural, historical and cultural heritage values and recreational opportunities*

#### **Crown Minerals**

1. *The Minister will consider each application for an access arrangement on a case-by-case basis, in accordance with the criteria set out in the relevant section (i.e. s61 or s61A and s61B) of the Crown Minerals Act 1991.*
2. *When assessing an application for an access arrangement for prospecting, exploration or mining, consideration should be given to (but not be limited to):*
  - a) *the significance of the conservation values present and the effect the proposal will have on those values;*
  - b) *the adequacy and achievability of the proposed site rehabilitation work (see also Policy 3 below); and*
  - c) *the adequacy or appropriateness of any compensation offered for access to the area (see also Policy 4 below).*
3. *Appropriate site rehabilitation methods should be employed.*
4. *Compensation should be required when damage to, or destruction of, conservation values cannot be avoided, remedied or mitigated and will be determined on a case-by-case basis.*

5. Where ancillary activities such as roads and infrastructure can reasonably be located off public conservation land, this will be expected.
6. The term of any access arrangement should be limited to the period reasonably required to carry out the defined work, including site rehabilitation after mining has been completed.
7. Low-impact access options will be preferred (e.g. the use of existing formed roads, or helicopters in areas without existing roads).

### **Grazing and Farming**

1. Grazing licences may be granted for a term of 15 years, unless the achievement of the outcomes and objectives of this CMS, any relevant management plan or any constraints require a lesser period.
2. Te Rūnanga o Ngāi Tahu should be consulted when considering applications to graze areas containing nohoanga entitlement sites. Approval may include specific conditions to protect the site, e.g. fencing (see also Section 3.1.3.4).
3. Concessionaires shall not unreasonably withhold consent to hunters who hold a current hunting permit issued by the Department of Conservation to hunt on the site, or access to hunters who wish to cross the site.

### **National Parks General Policy 2005 – activities requiring authorisation policies**

#### **General**

- 10.1(b) Any application for a concession or other authorisation will comply with, or be consistent with, the purposes of the National Parks Act 1980, the statutory purposes of the place where the activity is located, the conservation management strategy and the national park management plan.
- 10.1(c) Conservation management strategies and national park management plans should, subject to policy 10.1(b), require that all activities in national parks which require a concession or other authorisation:
- i) be consistent with the outcomes planned for places;
  - ii) be consistent with the preservation as far as possible of the national park in its natural state;
  - iii) minimise adverse effects, including cumulative effects, on other national park values;
  - iv) not have any adverse effects on the existing recreational opportunities in the area;
  - iv) be restricted to the use of existing access; and
  - v) minimise adverse effects on the benefit, use and enjoyment of the public, including public access.

#### **Grazing and farming**

- 10.2(a) A national park management plan may make provision for grazing or farming only on land which is already farmed or grazed, and only where the balance of evidence demonstrates that it is in the public interest that farming or grazing on that land should continue.
- 10.2(b) An application for a grazing or farming concession for a national park may, subject to policy 10.2(a), be granted where:
- i) there is no risk of erosion caused by grazing or farming;
  - ii) national park values will not be detrimentally affected;
  - iii) grazing animals can be effectively controlled;
  - iv) the number and type of stock are suitable for the location and land type;
  - vi) adverse effects of stock on waterways, wetlands and riparian zones can be avoided;
  - vii) freedom of entry and access for the public can be maintained; and
  - viii) the potential of sites for restoration will not be compromised.

- 10.2(c) *Any grazing concession issued should, where possible, be for a term not exceeding five years, and market rentals should be paid.*
- 10.2(d) *National park management plans may make provision for continuation of grazing in the public interest as a management tool where the balance of evidence has shown this is appropriate to preserve particular indigenous species, habitats and ecosystems and other national park values.*



**Attachment 4**

**Submission on reclassification proposals**