

# Stewardship Land Reclassification: Summary of Submissions Report Appendix 4: Inangahua



Department of  
Conservation  
*Te Papa Atawhai*

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## INA\_01 – Buller River - Lyell – 2807811

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Buller River - Lyell	INA_01_2807811f	Conservation Park	Neutral	13	11

### DOC Conservation Values Report (CVR) Description

A 32.5617-ha forest and scrub covered area on a hillslope within a horseshoe bend in Buller River, opposite New Creek and adjoining Victoria Forest Park. It plays an important role locally in the connectivity across the protected areas and contiguous indigenous forest vegetation.

### Panel Recommendations

National Panel: Conservation park, as adding it to the Victoria Forest Park will provide landscape continuity and connectivity across the area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification based on the recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. forest and shrubland of moderate representative and naturalness value with some historic clearance) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_01\_2807811f

### Support

#### Access and Recreation (Allowed)

- Submitters noted that the classification “Gives access to the old stock track that leads to Boundary Peak”.

I recommend that these comments are accepted. They provide site-specific details regarding the public access and recreational features present which are appropriately reflected by the notified classification. They hold merit under the Conservation Act as they support promotion of recreation that is not inconsistent with the preservation of the natural and historic resources present.

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.



I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that this comment is not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.
- A submitter suggested that the status does not recognise the ecological/landscape context (e.g. “land parcel lies adjacent to land that has a higher protected status than that proposed”) and recommended classification as a scenic reserve.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (e.g. forest and shrubland of moderate representative and naturalness value with a 4WD access track) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter advocated that helicopter “landing permissions continue to be available” through the current DOC system, and that the current “concessions system continues to be the only system used for permissions”.
- A submitter requested that “rivers are maintained in a free-flowing unmodified state”, and that the “classification does not allow for dams or flow diversions”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_02 – Rahui - Buller River Island – 2807816

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Rahui - Buller River Island	INA_02_2807816g	Scenic Reserve (a)	Neutral	10	5

### DOC Conservation Values Report Description

A 13.2699-ha rare remnant of woody vegetation on the agriculturally developed Walkers Flat. The area supports shrubland regenerating forest on low river terrace. This land environment within Buller Ecological District is public conservation land in indigenous forest is rare and distinctive.

### Panel Recommendations

National Panel: Scenic reserve (a), to preserve and protect the natural environment in this area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural resources present (e.g. indigenous regenerating forest).

## Scenic Reserve (a) - INA\_02\_2807816g

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that this comment is accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_03 – Buller River Island – 2807817

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Buller River Island	INA_03_2807817h	Local Purpose (River Conservation) Reserve	Neutral	6	12

### DOC Conservation Values Report Description

A 5.3008-ha area which is a mixture of riparian forest, gravel riverbed and active river. The island has moved/migrated since it was initially surveyed and is likely to continue to change as it is in a dynamic ecosystem, and has been subject to recent flooding. Little recreation use, except possibly the occasional fisher.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve is considered to reflect the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_03\_2807817h

### Support

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.



- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote revegetation and “become part of our emission reduction programme”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (areas of riparian vegetation and a section of riverbed).

- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve. It was noted that the area contains naturally uncommon ecosystems.
- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana o te Taiao, i.e. Aotearoa New Zealand Biodiversity Strategy) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## INA\_03 – Buller River Island – 2807827

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Buller River Island	INA_03_2807827i	Local Purpose (River Conservation) Reserve	Neutral	6	12

### DOC Conservation Values Report Description

A 2.7308-ha area which is a mixture of gravel riverbed and active river. The island has moved/migrated since it was initially surveyed and is likely to continue to change as it is in a dynamic ecosystem, and has been subject to recent flooding. Little recreation use, except possibly the occasional fisher.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve is considered to reflect the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_03\_2807827i

### Support

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.



I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (gravel riverbed and a section of active river).

- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.
- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for scenic reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## INA\_04 – Inangahua Junction – 2807825

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua Junction	INA_04_2807825j	Scenic Reserve (a)	Neutral	6	22

### DOC Conservation Values Report Description

A 103.0077-ha area which is primarily podocarp/hardwood/beech forest on tilted limestone block of Tertiary age. The area is adjacent to the northern eastern end of the Paparoa National Park, Rosemount Scenic Reserve and is adjacent to a Species Management Unit (SMU) for Powelliphanta 'Buller River'.

### Panel Recommendations

National Panel: Scenic reserve (a), to preserve the identified flora, natural environment and landscape values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. podocarp/hardwood/beech forest) and will align with the context of the adjoining Rosemount Scenic Reserve.

## Scenic Reserve (a) - INA\_04\_2807825j

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection "in light of the impacts of climate change".

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, "safeguarding the options of future generations", in relation to 'natural resources', "the air, water and soil in or on which any plant or animal lives or may live", and in relation to 'protection' of a resource, "restoration to some former state and its augmentation, enhancement, or expansion" (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the "information in the technical reports" or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".



I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Access and Recreation (Allowed)

- Submitters advocated for classification as national park, noting that “part of the area makes up the Profanity Cave system catchment”, and “regionally significant for recreational caving and has a rich exploration history”.
- Submitters noted the potential amenity value of the area, describing it as “a prime area for putting into the Paparoa National Park with a view to future opening up walking tracks for the public”.

I recommend that these comments are not accepted. The proposed classification provides for the public to have freedom of entry and access to the reserve, subject to conditions necessary for the protection and well-being of the reserve and the public themselves, as per Section 19(2)(b) of the Reserves Act 1977. The points raised do not justify overturning the notified intention.

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Ecology and Landscape (Allowed)

- Submitters advocated for classification as national park, noting that the area “contains karst and is almost certainly linked hydrologically to Paparoa National Park” (e.g. “karst features that contribute drainage and therefore the formation of the Profanity Cave”).

I recommend that these comments are not accepted. Although the wider area “contains karst and is likely linked hydrologically to Paparoa National Park” my assessment of the Western South Island Region Cave and Karst Operational Plan (2018, pg. 63) is that there are no karst caves present in this conservation area and the likelihood of hydrological linkage to Paparoa National Park does not warrant reconsideration of the notified intention.

- Submitters advocated for classification as national park due to the natural values present, noting that the area contains “at risk and/or threatened species, scenery and/or ecosystems, the preservation of which is in the national interest” (e.g. “Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park” “contiguous with and contains similar values to Paparoa National Park”).
- Submitters advocated for a national park classification to protect the rare species’ present (e.g. “one of the few surviving habitats of the large land snail, *Powelliphanta Buller River*”, “Great spotted kiwi and South Island kākā, both Nationally Vulnerable”, “the snail species *Opacuincola permutate*”).

I recommend that these comments are not accepted. Although some of the natural resources present are consistent with those in the adjoining national park, my assessment is that they are more closely aligned with the adjacent scenic reserve, and the points raised do not justify overturning the notified intention. The CVR notes that the habitat for the large land snail, *Powelliphanta ‘Buller River’* is present in the White Cliffs Conservation Area (NaPALIS #2807842), which has been recommended for addition to the Paparoa National Park (e.g. “*The forest on the lower western side of White Cliffs Bluff is part of the type locality and one of the few surviving habitats of the large land snail, Powelliphanta ‘Buller River’ (Nationally Critical)*”). Under a scenic reserve classification “indigenous flora and fauna, ecological associations, and natural environment and beauty shall as far as possible be preserved” (Reserves Act 1977, s. 19(2)(a)).

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification (e.g. “add to Paparoa National Park”).

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_04 – Lower Buller Gorge Road – 2807826

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Lower Buller Gorge Road	INA_04_2807826k	National Park		6048*	22
Lower Buller Gorge Road	INA_04_2807826l		Stewardship	12	47

### DOC Conservation Values Report Description

A 41.5603-ha area which is primarily podocarp/hardwood/beech forest on tilted limestone block of Tertiary age. The area is adjacent to Conservation Area - White Cliffs and near the northern eastern end of the Paparoa National Park.

### Panel Recommendations

National Panel: National park, as an addition to the Paparoa National Park which will preserve the natural state of these areas as far as possible, while also supporting continuity of landscape across the wider area.

Mana Whenua Panel: Retain as stewardship land pending further policy work or legal reform, based on the tribal position that the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi as it alienates Ngāi Tahu from their ancestral lands.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, by referring this area to the NZCA for its consideration on the suitability of a national park classification in accordance with the relevant policy and procedures, including Policy 6 of the General Policy for National Parks and Section 4 of the Conservation Act 1987.

Summary of accepted submissions: The submissions accepted as holding merit supported the proposed national park investigation to protect the area's natural values, facilitate recreational access and improve climate change mitigation. Submitters referenced specific natural resources which were noted to be of high value and similar in nature to the adjoining national park.

Section 4 and Treaty principles: The Mana Whenua Panel opposed the proposed national park referrals, supported by submissions from Treaty partner organisations. Te Rūnanga o Ngāi Tahu oppose all additions to national parks within the Ngāi Tahu takiwā as "the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi (as required by section 4 of the Conservation Act 1987) as it alienates Ngāi Tahu from our ancestral lands".

I note that my s.49 recommendations and your decision on whether to refer this area to the NZCA for their consideration must give effect to Treaty principles independently of the NZCA's section 4 obligations.

Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present are of a similar nature to the adjacent national park, and warrant proceeding with a referral to the NZCA. Giving effect to Section 4 of the Act includes taking reasonable steps to actively protect the identified Treaty partner interests, but this obligation is not absolute and unqualified, as this would be inconsistent with DOC's other statutory responsibilities.

Referring this area to the NZCA for their consideration provides an opportunity for the NZCA to further assess the natural and historic resources present, and explore specific Ngāi Tahu interests and aspirations, including their consideration as to what giving effect to Treaty principles may require.

Rationale: My conclusion, considering those submissions accepted, is that the natural and historic resources present warrant referral to the NZCA for their consideration as per the process set out in Chapter 3 of the introduction to this Summary of Submissions Report.

\* This figure includes 5,976 submissions made using a Forest and Bird template.



## National Park (Paparoa) - INA\_04\_2807826k

### Support

#### Access and Recreation (Allowed)

- A submitter noted that due to the proximity to the highway, it is a “prime area for putting into the Paparoa National Park with a view to future opening up walking tracks for the public”.
- Submitters noted that “part of the area makes up the Profanity Cave system catchment”, describing it as “regionally significant for recreational caving and has a rich exploration history” (e.g. “well-known caves, which adds to the potential amenity value”).
- Submitter supported the recommendation as it guarantees access rights for the public (e.g. “protect the outstanding recreational, landscape and ecological values for current and future generations”).

I recommend that these comments are accepted. These comments hold merit under the Conservation Act as they support promotion of recreation that is not inconsistent with the preservation of the natural and historic resources present. Under a national park classification “the public shall have freedom of entry and access” subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)(e)).

#### Climate Change and Natural Hazards (Allowed)

- Submissions suggested that suitable stewardship land should be incorporated into adjacent conservation areas to support climate change mitigation, and that the protection of the area was especially important in the context of climate change (e.g. “for ecosystem services, for climate stability”, “given the biodiversity and climate crisis we are facing”).

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as national park will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### Ecology and Landscape (Allowed)

- Submitters noted the ecological and karst value of the area (e.g. “contains karst and is almost certainly linked hydrologically to Paparoa National Park”, “one of the few surviving habitats for Powelliphanta, rare forest species such as kākā and kākāriki and distinct geological features”, “scenic white cliffs highly visible from the road”).
- Submissions supported reclassification as a national park based on the land holding similar or higher values to the adjacent national parks (e.g. “they include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands”, “adjacent to a National Park, and ecologically contiguous with it”).
- Submitters extolled the benefits of a national park classification, noting comments such as that it will “expand ecological sequences”, “provide additional habitat for rare and threatened species to move through the landscape”, “in many cases the conservation values of the land parcel and adjacent national park are indistinguishable” and provide increased “corridors” and “connectivity”, with submissions describing current land delineations as “historic and arbitrary” rather than informed by ecological principles.
- Submissions highlighted the value of a national park classification, with one submitter calling it the “pinnacle of conservation land protection”, noting this as appropriate for areas of such high ecological value (e.g. “to protect intrinsic values of our Gondwana heritage”).

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of the few surviving habitats of the large land snail, Powelliphanta ‘Buller River’ (Nationally Critical)), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park

further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

### Treaty Considerations (Allowed)

- Submissions in support of national parks noted a desire to “see the concerns of mana whenua addressed”, with some noting specific support for areas where mana whenua had not identified site-specific cultural values for the land.
- Submitters advocated for changes to management or legislative frameworks to reflect Treaty principles and to ensure free access and use of national parks for cultural, traditional, historical, and customary purposes, while ensuring that natural values are preserved and protected (e.g. “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed”). It was suggested that Mana Whenua Panel concerns need to be “debated on a large scale rather than through this reclassification exercise”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Several submissions expressed general support for all additions to national parks without providing further details, or expressed their desire for maximum protection of natural values across all stewardship land.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submission supported the expansion of the Paparoa National Park based on anticipated benefits for tourism in the area, noting that the presence of attractions like the Paparoa Great Walk and the Coast Road Highway has led to investments in tourism-related industries.
- A submission noted that national park status protects against “environmentally degrading activities such as mining and clearing the land for further agriculture”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.
- A submitter queried the lack of terms of reference for the Mana Whenua Panel and “its method of decision-making”, raising concern “that commercial concerns could take precedence over protecting the natural values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

- A submission sought for public conservation land to be restored and rehabilitated to maintain buffer zones and ecological diversity.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submission stated opposition to any reclassification unless it provides explicitly for access, including helicopter landings, sports fishing and gamebird hunting, or stated opposition as national park status “excludes hunting for native species which are classified as gamebirds under the Wildlife Act, and which are managed as gamebirds (such as Pūkeko and Paradise Shelduck)”.
- A submission expressed concern about loss of recreation opportunities and access (including dog walking), suggesting that other classifications, such as conservation park, may provide a better balance between recreational enjoyment and protection of natural values.
- A submission recommended recreation reserve where areas have high cultural or recreational value to the public.

I recommend that these comments are not accepted. The methods of appreciation and recreational enjoyment proposed (dog access, hunting of indigenous avifauna) are potentially incompatible with protecting and preserving the natural resources described in the CVR, and the points raised do not justify overturning the notified intention. Although under a national park classification, “the public shall have freedom of entry and access” and this is subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)).

### Climate Change and Natural Hazards (Allowed)

- A submitter advocated that the area “should be considered as part of the larger Westport Climate Adaptation and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Ecology and Landscape (Allowed)

- Submissions suggested that the ecological values of the land are not high enough to meet the standard for national park classification, characterising the area as “not so unique or scientifically important to meet the standard set by the National Parks Act”. It was suggested that recreation reserve or scenic reserve would ensure sufficient protection but are less restrictive.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of the few surviving habitats of the large land snail, *Powelliphanta ‘Buller River’* (Nationally Critical)) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Several submissions opposed the proposed national park investigation whilst supporting the proposal to retain the area in stewardship, pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective. This follows a Ngāi Tahu tribal position that a national park classification “obstructs Ngāi Tahu from maintaining ancestral relationships with the whenua, obstructs kaitiaki rights and responsibilities, limits the meaningful involvement of Ngāi Tahu in decision-making processes, and is less enabling of customary practices that are fundamental to sustaining tribal identity and mana”.
- A submitter opposed national park classification on the basis that it “does not allow for mana whenua of the area to be involved in its care in the same way that stewardship land does” and “recognises Māori and mana whenua as holding equal interest in the land as New Zealanders”. It was suggested that “classifying this land to National Park



land goes against the Crown obligations under Te Tiriti o Waitangi and even under the principles of Treaty of Waitangi”.

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

#### General (Allowed)

- Submissions stated general opposition to national park classification and support for leaving the land in stewardship, or expressed support for the recommendations made by the Mana Whenua Panel, without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions expressed opposition to the proposed national park classification as being “too restrictive” (e.g. “tying even more land up in restrictive legislation”) and not in the best interests of the public as it would “have negative impact on the potential economic benefit derived from mineral resource extraction”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter advocated that a national park classification should only be implemented “following extensive consultation and agreement with the local Iwi, stakeholders, concessionaires, interested groups and local residents”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.
- A submission expressed the view that national park classification does not equate to effective protection from introduced pests or predators.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Retain in Stewardship - INA\_04\_28078261

*The comments received in relation to the Mana Whenua Panel recommendation are summarised below and have been considered in relation to the notified proposal when forming s.49 allow/accept recommendations.*

#### Support

##### Ecology and Landscape (Allowed)

- A submission suggested that there was insufficient evidence of the conservation value and characteristics to justify a national park classification.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality, and one of the few surviving habitats of the large land

snail, Powelliphanta ‘Buller River’ (Nationally Critical)) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Submissions supported retaining land in stewardship on the basis that the Mana Whenua Panel recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu’s claim and connection to their ancestral lands (e.g. “by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi”, “National Parks have stringent preservation and protection which obstruct Ngāi Tahu from maintaining ancestral relationships with the whenua”).
- A submission suggested that the area “must remain as stewardship land pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective”.

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated support for the proposed classification or agreement with the Mana Whenua Panel without providing further details or agreed they reflected the “information in the technical reports”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter stated that reclassifying land as national park, or other classifications which fall under Schedule 4, could have economic consequences by excluding mineral extraction and other activities on that land. The potential loss of opportunities resulting from these restrictions was seen as damaging, particularly in terms of mineral extraction and site rehabilitation.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these classifications provide “more than adequate legal protection”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission suggested that a holistic view, considering mineral prospectivity and other economic, social, and cultural considerations, should be taken when reclassifying stewardship land.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submissions advocated for national park reclassification as the land has high conservation values which are equivalent or similar to the adjacent national parks (e.g. classification should be “based upon ecological and scenic values that are similar to adjoining national parks”, “Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park”, and the “nationally significant ecological systems and natural areas” present).
- One submission highlighted that the land has “high conservation values, equivalent to those in the area included in the park when it was formed 45 years ago. They include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands than is currently in the park”.

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of the few surviving habitats of the large land snail, *Powelliphanta 'Buller River'* (Nationally Critical)), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

- One submission recommended reclassification as a conservation park, or suggested a scenic reserve or recreation reserve to ensure sufficient protection in areas where there is potential risk of damaging activities such as mining.

I recommend that these comments are not accepted. My assessment is that the natural resources warrant referring this area to the NZCA for its recommendation as to the suitability of a national park addition. The points raised do not justify overturning the notified intention.

### Treaty Considerations (Allowed)

- A submitter opposed “Mana Whenua’s blanket opposition to adding areas of stewardship land to National Parks”, suggesting that “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed, as set out in s4 of the National Parks Act 1980”.
- A submitter suggested that the proposal to retain the area in stewardship “goes beyond the obligation to give effect to the Treaty of Waitangi”, advocating that “an area with high conservation values should be reclassified to reflect that value”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated general opposition to the classification without providing further justification, expressed preference for reclassification as a national park due to factors such as the “high protection” provided, or suggested reclassification as either scenic reserve or conservation park is preferable to retaining the land in stewardship.
- A submission sought the “highest possible classification” due to the land’s “high cultural conservation value”.
- A submission opposed retaining land in stewardship, describing it as a “meaningless recommendation”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submitter advocated for a national park classification to prevent the “creation of mines that will devastate the local areas”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.



- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- A submission queried the extent of land in South Westland not included in the reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_04 – White Cliffs – 2807842

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
White Cliffs	INA_04_2807842m	National Park		6050*	22
White Cliffs	INA_04_2807842n		Stewardship	12	49

### DOC Conservation Values Report Description

A 442.7616-ha area of podocarp/hardwood/beech forest on tilted limestone block of Tertiary age, with bare talus and seral vegetation on landslips from the Murchison and Inangahua earthquakes still visible under the highest points of the western facing escarpment. Heavily forested eastern slopes. The area bounds the northern eastern end of the Paparoa National Park.

### Panel Recommendations

National Panel: National park, as an addition to the Paparoa National Park which will preserve the natural state of these areas as far as possible, while also supporting continuity of landscape across the wider area.

Mana Whenua Panel: Retain as stewardship land pending further policy work or legal reform, based on the tribal position that the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi as it alienates Ngāi Tahu from their ancestral lands.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, by referring this area to the NZCA for its consideration on the suitability of a national park classification in accordance with the relevant policy and procedures, including Policy 6 of the General Policy for National Parks and Section 4 of the Conservation Act 1987.

Summary of accepted submissions: The submissions accepted as holding merit supported the proposed national park investigation to protect the area's natural values, facilitate recreational access, and improve climate change mitigation. Submitters referenced specific natural resources which were noted to be of high value and similar in nature to the adjoining national park.

Section 4 and Treaty principles: The Mana Whenua Panel opposed the proposed national park referrals, supported by submissions from Treaty partner organisations. Te Rūnanga o Ngāi Tahu oppose all additions to national parks within the Ngāi Tahu takiwā as "the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi (as required by section 4 of the Conservation Act 1987) as it alienates Ngāi Tahu from our ancestral lands".

I note that my s.49 recommendations and your decision on whether to refer this area to the NZCA for their consideration must give effect to Treaty principles independently of the NZCA's section 4 obligations.

Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present are of a similar nature to the adjacent national park, and warrant proceeding with a referral to the NZCA. Giving effect to Section 4 of the Act includes taking reasonable steps to actively protect the identified Treaty partner interests, but this obligation is not absolute and unqualified, as this would be inconsistent with DOC's other statutory responsibilities.

Referring this area to the NZCA for their consideration provides an opportunity for the NZCA to further assess the natural and historic resources present, and explore specific Ngāi Tahu interests and aspirations, including their consideration as to what giving effect to Treaty principles may require.

Rationale: My conclusion, considering those submissions accepted, is that the natural and historic resources present warrant referral to the NZCA for their consideration as per the process set out in Chapter 3 of the introduction to this Summary of Submissions Report.

\* This figure includes 5,976 submissions made using a Forest and Bird template.

## National Park (Paparoa) - INA\_04\_2807842m

### Support

#### Access and Recreation (Allowed)

- A submitter noted that due to the proximity to the highway, it is a “prime area for putting into the Paparoa National Park with a view to future opening up walking tracks for the public”.
- Submitters noted that “part of the area makes up the Profanity Cave system catchment”, describing it as “regionally significant for recreational caving and has a rich exploration history” (e.g. “well-known caves, which adds to the potential amenity value”).
- Submitter supported the recommendation as it guarantees access rights for the public (e.g. “protect the outstanding recreational, landscape and ecological values for current and future generations”).

I recommend that these comments are accepted. These comments hold merit under the Conservation Act as they support promotion of recreation that is not inconsistent with the preservation of the natural and historic resources present. Under a national park classification “the public shall have freedom of entry and access” subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)(e)).

#### Climate Change and Natural Hazards (Allowed)

- Submissions suggested that suitable stewardship land should be incorporated into adjacent conservation areas to support climate change mitigation, and that the protection of the area was especially important in the context of climate change (e.g. “with climate change starting to bite, our indigenous forests and wetlands are vital carbon sinks”, “for ecosystem services, for climate stability”, “given the biodiversity and climate crisis we are facing”).

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as national park will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### Ecology and Landscape (Allowed)

- Submitters noted the ecological and karst value of the area (e.g. “contains karst and is almost certainly linked hydrologically to Paparoa National Park”, “given the scale of the limestone cliffs and karst terrain”, “a significant landscape feature and doubtless of geological and ecological significance as well”, “habitat for the critically endangered Powelliphanta”, “scenic white cliffs highly visible from the road”).
- Submissions supported reclassification as a national park based on the land holding similar or higher values to the adjacent national parks (e.g. “they include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands”, “adjacent to a National Park, and ecologically contiguous with it”, “will provide for the natural landscape sequence from the main highway to the National Park beyond”).
- Submitters extolled the benefits of a national park classification, noting comments such as that it will “expand ecological sequences”, “provide additional habitat for rare and threatened species to move through the landscape”, “in many cases the conservation values of the land parcel and adjacent national park are indistinguishable” and provide increased “corridors” and “connectivity”, with submissions describing current land delineations as “historic and arbitrary” rather than informed by ecological principles (e.g. “a link between areas of the national park that are currently isolated”).
- Submissions highlighted the value of a national park classification, with one submitter calling it the “pinnacle of conservation land protection”, noting this as appropriate for areas of such high ecological value (e.g. “to protect intrinsic values of our Gondwana heritage”).

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of



the few surviving habitats of the large land snail, *Powelliphanta 'Buller River'* (Nationally Critical)), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

### Treaty Considerations (Allowed)

- Submissions in support of national parks noted a desire to “see the concerns of mana whenua addressed”, with some noting specific support for areas where mana whenua had not identified site-specific cultural values for the land.
- Submitters advocated for changes to management or legislative frameworks to reflect Treaty principles and to ensure free access and use of national parks for cultural, traditional, historical, and customary purposes, while ensuring that natural values are preserved and protected (e.g. “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed”). It was suggested that Mana Whenua Panel concerns need to be “debated on a large scale rather than through this reclassification exercise”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Several submissions expressed general support for all additions to national parks without providing further details, or expressed their desire for maximum protection of natural values across all stewardship land.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submission supported the expansion of the Paparoa National Park based on anticipated benefits for tourism in the area, noting that the presence of attractions like the Paparoa Great Walk and the Coast Road Highway has led to investments in tourism-related industries (e.g. “there is little doubt that the park has brought considerable economic benefits to the West Coast”).
- A submission noted that national park status protects against “environmentally degrading activities such as mining and clearing the land for further agriculture”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.
- A submitter queried the lack of terms of reference for the Mana Whenua Panel and “its method of decision-making”, raising concern “that commercial concerns could take precedence over protecting the natural values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.
- A submission sought for public conservation land to be restored and rehabilitated to maintain buffer zones and ecological diversity.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submission stated opposition to any reclassification unless it provides explicitly for access, including helicopter landings, sports fishing and gamebird hunting, or stated opposition as national park status “excludes hunting for native species which are classified as gamebirds under the Wildlife Act, and which are managed as gamebirds (such as Pūkeko and Paradise Shelduck)”.
- A submission expressed concern about loss of recreation opportunities and access (including dog walking), suggesting that other classifications, such as conservation park, may provide a better balance between recreational enjoyment and protection of natural values.
- A submission recommended recreation reserve where areas have high cultural or recreational value to the public.

I recommend that these comments are not accepted. The methods of appreciation and recreational enjoyment proposed (dog access, hunting of indigenous avifauna) are potentially incompatible with protecting and preserving the natural resources described in the CVR, and the points raised do not justify overturning the notified intention. Although under a national park classification “the public shall have freedom of entry and access” this is subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)).

### Climate Change and Natural Hazards (Allowed)

- A submitter advocated that the area “should be considered as part of the larger Westport Climate Adaptation and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Ecology and Landscape (Allowed)

- Submissions suggested that the ecological values of the land are not high enough to meet the standard for national park classification, characterising the area as “not so unique or scientifically important to meet the standard set by the National Parks Act”. It was suggested that recreation reserve or scenic reserve would ensure sufficient protection but are less restrictive.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of the few surviving habitats of the large land snail, *Powelliphanta* ‘Buller River’ (Nationally Critical)) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Several submissions opposed the proposed national park investigation whilst supporting the proposal to retain the area in stewardship, pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective. This follows a Ngāi Tahu tribal position that a national park classification “obstructs Ngāi Tahu from maintaining ancestral relationships with the whenua, obstructs kaitiaki rights and responsibilities, limits the meaningful involvement of Ngāi Tahu in decision-making processes, and is less enabling of customary practices that are fundamental to sustaining tribal identity and mana”.
- A submitter opposed national park classification on the basis that it “does not allow for mana whenua of the area to be involved in its care in the same way that Stewardship land does” and “recognises Māori and mana whenua as

holding equal interest in the land as New Zealanders”. It was suggested that “classifying this land to National Park land, goes against the Crown obligations under Te Tiriti o Waitangi and even under the principles of Treaty of Waitangi”.

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated general opposition to national park classification, support for leaving the land in stewardship, or expressed support for the recommendations made by the Mana Whenua Panel, without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions expressed opposition to the proposed national park classification as being “too restrictive” (e.g. “tying even more land up in restrictive legislation”) and not in the best interests of the public as it would “have negative impact on the potential economic benefit derived from mineral resource extraction”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter advocated that a national park classification should only be implemented “following extensive consultation and agreement with the local Iwi, stakeholders, concessionaires, interested groups and local residents”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.
- A submission expressed the view that national park classification does not equate to effective protection from introduced pests or predators.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Retain in Stewardship - INA\_o4\_2807842n

*The comments received in relation to the Mana Whenua Panel recommendation are summarised below and have been considered in relation to the notified proposal when forming s.49 allow/accept recommendations.*

### Support

#### Ecology and Landscape (Allowed)

- A submission suggested that there was insufficient evidence of the conservation value and characteristics to justify a national park classification.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of the few surviving habitats of the large land snail,



Powelliphanta 'Buller River' (Nationally Critical)) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Submissions supported retaining land in stewardship on the basis that the Mana Whenua Panel recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu's claim and connection to their ancestral lands (e.g. "by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi", "National Parks have stringent preservation and protection which obstruct Ngāi Tahu from maintaining ancestral relationships with the whenua").
- A submission suggested that the area "must remain as stewardship land pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective".

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA's consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated support for the proposed classification or agreement with the Mana Whenua Panel without providing further details or agreed they reflected the "information in the technical reports".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter stated that reclassifying land as national park, or other classifications which fall under Schedule 4, could have economic consequences by excluding mineral extraction and other activities on that land. The potential loss of opportunities resulting from these restrictions was seen as damaging, particularly in terms of mineral extraction and site rehabilitation.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these classifications provide "more than adequate legal protection".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission suggested that a holistic view, considering mineral prospectivity and other economic, social, and cultural considerations, should be taken when reclassifying stewardship land.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submissions advocated for national park reclassification as the land has high conservation values which are equivalent or similar to the adjacent national parks (e.g. classification should be "based upon ecological and scenic values that are similar to adjoining national parks", "Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park", and the "nationally significant ecological systems and natural areas" present).
- One submission highlighted that the land has "high conservation values, equivalent to those in the area included in the park when it was formed 45 years ago. They include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands than is currently in the park".

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. the assessment area vegetation remains entirely indigenous, part of the type locality and one of the few surviving habitats of the large land snail, *Powelliphanta 'Buller River'* (Nationally Critical)), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

- One submission recommended reclassification as a conservation park, or suggested a scenic reserve or recreation reserve to ensure sufficient protection in areas where there is potential risk of damaging activities such as mining.

I recommend that these comments are not accepted. My assessment is that the natural resources warrant referring this area to the NZCA for its recommendation as to the suitability of a national park addition. The points raised to not justify overturning the notified intention.

### Treaty Considerations (Allowed)

- A submitter opposed “Mana Whenua’s blanket opposition to adding areas of stewardship land to National Parks”, suggesting that “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed, as set out in s. 4 of the National Parks Act 1980”.
- A submitter suggested that the proposal to retain the area in stewardship “goes beyond the obligation to give effect to the Treaty of Waitangi”, advocating that “an area with high conservation values should be reclassified to reflect that value”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated general opposition to the classification without providing further justification, expressed preference for reclassification as a national park due to factors such as the “high protection” provided, or suggested reclassification as either scenic reserve or conservation park is preferable to retaining the land in stewardship.
- A submission sought the “highest possible classification” due to the land’s “high cultural conservation value”.
- A submission opposed retaining land in stewardship, describing it as a “meaningless recommendation”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submitter advocated for a national park classification to prevent the “creation of mines that will devastate the local areas”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- A submission queried the extent of land in South Westland not included in the reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## INA\_05 – Inangahua Junction – 2807819

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua Junction	INA_05_2807819o	Disposal	Disposal	9	31

### DOC Conservation Values Report Description

A 1.5459-ha area containing mainly pasture, with some indigenous riparian vegetation on a river terrace, although mostly highly modified farmland with limited diversity in a backcountry-remote zone.

### Panel Recommendations

National Panel: Disposal, as this area consists almost entirely of developed pasture. While there is narrow strip of indigenous riparian vegetation, it has insufficient ecological value to warrant ongoing management by the Department.

Mana Whenua Panel: Disposal. As the conservation area contains pastoral land it should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the area contains pastoral land.

Rationale: My assessment is that the stewardship area is of low conservation value and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_05\_2807819o

### Support

#### Access and Recreation (Allowed)

- A submitter stated they did not oppose disposal as there is “no likely recreational or climbing value”.

I recommend that these comments are accepted. I agree that this highly modified pastoral land does not hold any reported recreational value or provide public access to the river, supporting a disposal investigation.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. I agree that the land holds low conservation values, as it consists primarily of highly modified pasture, supporting a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu’s connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the highly modified nature of the pastoral components of this stewardship area (e.g. cleared of most native vegetation for grazing) justify referring this area to the Department to investigate the suitability of disposal.

- A submitter suggested, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal or agreement with the recommendation without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”. It was noted that “riparian access via new Marginal Strips is not guaranteed”.
- A submitter opposed disposal for “patches of river edges that are valued for recreation”, commenting that “some are just good to look at or to enjoy a roadside picnic”.
- Local purpose reserve was suggested as an alternative classification, with various purposes suggested such as river conservation, river access, or recreation access.

I recommend these comments are not accepted. The stewardship area does not provide practical access to the river from road or public conservation land, and there are no reported recreational uses. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips which will secure ongoing public access along the riparian corridor.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- Alternative classifications suggested included GPR (river floodplain), scenic reserve or ecological reserve.
- A submitter noted that the area “provides a buffer to erosion by river”.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature, and its landscape context (bordering unformed legal road alongside private farmland, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land. This will protect the riparian vegetation present, supporting flood/erosion buffering.

### Ecology and Landscape (Allowed)

- Submitters recommended local purpose (river conservation) reserve “for ecological reasons”, noting that “the block in question is adjacent to and sits on a bend of the Inangahua river; it contains a strip of indigenous forest, has potential for carbon capture through regrowth, has value for river protection and should not be disposed of”. They also stated that the “adjacent landowner has encroached on PCL”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- It was recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The area’s small size, highly modified nature (predominantly pasture), and its landscape context (bordering unformed legal road alongside private farmland, not connected to other public conservation land), limit the appropriateness and effectiveness of retaining the area for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection (and protection from mining and extractive activities) or supported “a cautionary approach” and preference to retain land in Crown ownership.
- A submitter suggested adding the area to Paparoa National Park.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.



### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing, planting and setbacks were put in place.

As these comments are not allowed, I recommend they are not accepted. Any conditions on disposal are not the subject of the public notice.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the area is small and not connected to other public conservation land, it has limited potential for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will be retained and protected as public conservation land, which will protect the riparian vegetation present and support flood buffering.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Other (Not Allowed)

- One submission noted that disposal of land will be subject to the Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.

## INA\_o6 – Dee Creek – 2807822

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Dee Creek	INA_o6_2807822p	Conservation Park	Neutral	12	12

### DOC Conservation Values Report Description

A 72.6825-ha area of forest-covered low hillslope and fan. The area plays an important role in connecting the surrounding public lands and buffering from the presence of pest plants in adjacent agricultural land. There is an unmarked track in one of the INA\_o6 areas giving access to a community hut in Victoria Forest Park. Other than this, hunting is the other possible recreation use.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park will provide landscape continuity and protection for the forests and rare and at-risk flora and fauna.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification based on the recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. mature forest and regenerating forest with limited pasture) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_o6\_2807822p

### Support

#### Access and Recreation (Allowed)

- A submission noted that the classification provides the “only legal public access to the informal route to Mt Curtis Hut from SH6”.

I recommend that these comments are accepted. They provide site-specific details regarding the public access and recreational features present which are appropriately reflected by the notified classification. They hold merit under the Conservation Act as they support promotion of recreation that is not inconsistent with the preservation of the natural and historic resources present.

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not warrant overturning the notified intention.

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My assessment is that the natural resources present (e.g. mature forest and regenerating forest with limited pasture) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The contiguous boundary with the Victoria Forest Park further supports this recommendation. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.



I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.
- A submission suggested classification as an ecological area to provide stronger protection as the “Victoria Forest Park has a coal mine in it”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_o6 – Ram Creek – 2807823

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Ram Creek	INA_o6_2807823q	Scenic Reserve (a)	Neutral	10	5

### DOC Conservation Values Report Description

A 3.2176-ha area of forest-covered low hillslope and fan. Some areas of cleared forest are being used by a neighbouring farm (there are no permissions recorded). The assessment area plays an important role in connecting the surrounding public lands and buffering from the presence of pest plants in adjacent agricultural land. There is an unmarked track in one of the INA\_o6 areas giving access to a community hut in Victoria Forest Park. Other than this, hunting is the other possible recreation use.

### Panel Recommendations

National Panel: Scenic reserve (a) will improve continuity of landscape across the wider area and provide protection of the natural and endangered species present.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. forest and regenerating forest with a limited area of shrubland and pasture).

## Scenic Reserve (a) - INA\_o6\_2807823q

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.



- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_o6 – Ram Creek – 2807824

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Ram Creek	INA_o6_2807824r	Scenic Reserve (a)	Neutral	10	5

### DOC Conservation Values Report Description

A 12.8155-ha area of forest-covered low hillslope and fan. Some areas of cleared forest are being used by a neighbouring farm (there are no permissions). The area plays an important role in connecting the surrounding public lands and buffering from the presence of pest plants in adjacent agricultural land. There is an unmarked track in one of the INA\_o6 areas giving access to a community hut in Victoria Forest Park. Other than this, hunting is the other possible recreation use.

### Panel Recommendations

National Panel: Scenic reserve (a) will improve continuity of landscape across the wider area and provide protection of the natural and endangered species present.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. forest-covered low hillslope).

## Scenic Reserve (a)- INA\_o6\_2807824r

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.

- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## INA\_07 – Upper Buller Gorge Road – 2807820

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Upper Buller Gorge Road	INA_07_2807820s	Scenic Reserve (a)	Neutral	10	5

### DOC Conservation Values Report Description

A 0.5298-ha area of seemingly old growth indigenous forest near the confluence of Inangahua and Buller rivers, adjacent to the main street in Inangahua Junction. The topographic map shows a small waterway that is intercepted by a railway and state highway, so there are likely to be culverts or other instream structures that could impede fish passage.

### Panel Recommendations

National Panel: Scenic reserve (a), to improve landscape continuity, protect townscape values, and support the preservation of the rare flora and avifauna potentially present.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. old growth indigenous forest).

## Scenic Reserve (a) - INA\_07\_2807820s

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that this comment is accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_07 – Inangahua - Lancaster Street – 2807821

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua - Lancaster Street	INA_07_2807821t	Scenic Reserve (a)	Neutral	10	5

### DOC Conservation Values Report Description

A 2.8318-ha area of seemingly old growth indigenous forest near the confluence of Inangahua and Buller rivers, adjacent to a side road in Inangahua Junction.

### Panel Recommendations

National Panel: Scenic reserve (a), to improve landscape continuity, protect townscape values, and support the preservation of the rare flora and avifauna potentially present.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. old growth indigenous forest).

## Scenic Reserve (a) - INA\_07\_2807821t

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.



I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission recommended that the location “should be considered as part of the larger Westport Climate Adaption and Resilience Project”.

I recommend that these comments are not accepted. The proposed classification will support the protection of the natural resources present, and as a result, support the area’s climate mitigation potential. The points raised do not justify overturning the notified intention.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_o8 – Berlins Bluff – 2807829

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Berlins Bluff	INA_o8_2807829u	Ecological Area	Neutral	8	19

### DOC Conservation Values Report Description

A 2512.4825-ha forested area with multiple small waterways in broken hill country between Inangahua and Ohikanui rivers. It contains tributaries of these rivers, and also present are several slips in varying stages of regeneration and bluffs. It is surrounded by a mix of other public conservation land. With no easy walking access or direct road access, it is likely to receive little recreation use.

### Panel Recommendations

National Panel: Ecological area, to protect the identified ecological values, to reflect the diversity of the area, and to provide landscape continuity with the existing adjacent Berlins Bluff Ecological Area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of ecological area.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately protect the conservation of the natural and historic resources present, and will add to the ecological areas in the Inangahua Place which protect representative examples of a range of, mainly lowland, vegetation types.

## Ecological Area - INA\_o8\_2807829u

### Support

#### Climate Change and Natural Hazards (Allowed)

- Submissions expressed support for high environmental protection “in light of the impacts of climate change such as the flooding in Nelson and West Coast regions”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as an ecological area will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submitters expressed general agreement with the recommendation without providing further justification, or expressed their preference for maximum protection.

- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Access and Recreation (Allowed)

- Submitters advocated for addition to the Paparoa National Park, noting that “the area has high wilderness qualities from a recreation perspective”.

I recommend that these comments are not accepted. No new material is raised which supports reconsideration of the notified classification. The notified classification does not prohibit public access for the proposed activities, where consistent with preservation of the conservation values present.

### Ecology and Landscape (Allowed)

- Submissions in opposition advocated for the area to be added to the Paparoa National Park based on its landscape context, i.e. contiguous with the Paparoa National Park and other protected areas, and part of an Outstanding Natural Landscape (e.g. “It is an enclave of conservation land completely surrounded by high value Public Conservation Land, Paparoa Wilderness Area, Blackwater Ecological Area; Paparoa National Park disjunct outlier; Berlins Bluff Ecological Area; Fletcher Creek Wildlife Management Area; and Lower Buller Scenic Reserve”).
- Submitters suggested that the natural values are similar to those in the Paparoa National Park (e.g. “These areas have high conservation values, equivalent to those in the area included in the park when it was formed 45 years ago. They include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands than is currently in the park, and have high wildlife values. Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park. For management purposes it would make sense to manage all these areas under one management regime and administration, especially when there is a formal process of public involvement via the Park Board”).
- Submitters recommending national park classification cited various ecological values (e.g. that it is “a wild forested catchment without roads or tracks” that could be added to the Paparoa Wilderness Area, “completely intact indigenous forest except of seral communities on slip faces with multiple waterways, lowland valley to ridge broken hill country. The area has varied geology, granite (Hawks Crag breccia), limestone, sandstone and mudstone”, “at risk and/or threatened species; scenery and/or ecosystems which is in the national interest”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed ecological area classification (e.g. a large undeveloped indigenous forested area surrounded by high value conservation land including national park, ecological area and wilderness area), and the points raised do not justify overturning the notified intention. Classification as an ecological area requires the land to be managed so “as to protect the value for which it is held” (Section 21 of the Conservation Act 1987). The gazetted purpose of the existing Berlins Bluff Ecological Area, to which this area is proposed for addition, is “to protect forest ecosystems on the most extensive inland area of limestone in the North Westland Ecological Region”. It is my view that this purpose appropriately reflects the natural resources present, and, as with other ecological areas in the Inangahua Place, it will protect representative examples of a range of, mainly lowland, vegetation types. The West Coast Te Tai Poutini Conservation Management Strategy (2010-2020, pg. 219) notes that “these ecological areas and the other public conservation lands located between them form ‘wildlife corridors’, providing links that facilitate movement of fauna between the Paparoa Range and Victoria Forest Park”.

### General (Allowed)

- Submissions recommended adding the area to the Paparoa National Park without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.



### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions objected to the recommendation as limiting resource extraction with consequent negative economic impacts. One submitter noted that though ecological area classification does not prohibit mining, it adds extra restrictions, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the land notified.
- A submitter stated “Ecological Area (Conservation Act) is an area of land protected primarily for its particular scientific ecological value. The scientific value for which each ecological area is held is to be specified when it is declared. I do not have information of the specified value for which Berlins Ecological area was classified”.

As I have recommended these comments are not allowed, I recommend they are not accepted. I note that the gazetted purpose of the existing Berlins Bluff Ecological Area is “To protect forest ecosystems on the most extensive inland area of limestone in the North Westland Ecological Region”.

### Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows gamebird hunting and sports fishing, and suggested provision should be made to ensure it can continue.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

## INA\_09 – Brown Creek – 2807828

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Brown Creek	INA_09_2807828v	Local Purpose (River Conservation) Reserve	Neutral	6	12

### DOC Conservation Values Report Description

A 37.4487-ha narrow area along Brown Creek in the lower Inangahua Valley, with active creek bed and riparian margins of both exotic and indigenous forest. It is surrounded largely by developed farmland until the upper reaches above the Brown Creek bridge. A grazing licence is in place. Likely to receive little recreation use other than fishing.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve is considered to appropriately reflect the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_09\_2807828v

### Support (Allowed)

#### General

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.

- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (active creekbed and riparian river margins).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.



As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## INA\_10 – Inangahua River – 2807840

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River (Pasture)	INA_10_2807840a	Disposal	Disposal	9	32
Inangahua River (Riverbed)	INA_10_2807840b	Local Purpose (River Conservation) Reserve	Neutral	10	12

### DOC Conservation Values Report Description

A 17.2403-ha highly developed area surrounded by freehold land farms. It contains farmland with beech forest, river terrace and active riverbed, and supports the riverbed gravels and river channel, pasture, and indigenous riparian and secondary forest vegetation. Little recreation use, other than angling. Access is via Inangahua River, and a grazing licence is in place.

### Inangahua River (Pasture)

### Panel Recommendations

National Panel: Disposal. The presence of small areas of riverbed and riparian vegetation was not considered sufficient to warrant retainment of this area as a whole by the Department.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## Disposal - INA\_10\_2807840a

### Support

#### Access and Recreation (Allowed)

- A submitter noted that "the map seems to indicate a drop off or even a potential rocky outcrop behind this area, which this piece of land might provide access to, but there is no likely recreational value on this piece of land".

I recommend that these comments are accepted. I agree that the area is likely to hold low recreational value, being recorded in the CVR as likely to receive little recreation use, supporting a disposal investigation. The area recommended for disposal contains modified pasture, and I note that the area does not provide practical access to the river from road or public conservation land.

## Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The area recommended for disposal consists of modified pasture and holds low conservation values, supporting a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

## Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. The Mana Whenua Panel has supported the proposed disposal investigation. It is my assessment that the highly modified nature of the pastoral components of this stewardship area (e.g. cleared of most native vegetation for grazing) justify referring this area to the Department to investigate the suitability of disposal.

## General (Allowed)

- Submissions expressed general support for disposal or agreement with the recommendation without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”. It was noted that access is not guaranteed via Marginal Strips.
- A submitter opposed disposal for “patches of river edges that are valued for recreation”, commenting that “some are just good to look at or to enjoy a roadside picnic”.
- Local purpose reserve was suggested as an alternative to ensure public access, with the purpose either river conservation, river access or recreation access.

I recommend these comments are not accepted. The area does not provide practical access to the river from road or public conservation land. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor of the river and enable any recreational angling to continue.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).



- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that "In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)".
- Alternative classifications were suggested, such as GPR (river floodplain) or "Scenic Reserve or Ecological Reserve".
- It was noted that the recommendation "will not assist with reduction in emissions from agriculture".

I recommend that these comments are not accepted. The modified nature of the pastoral area recommended for disposal, its small size, and its landscape context (bounded by legal road within broader farmland, with no links to other public conservation land) limit the effectiveness of restoration for carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Ecology and Landscape (Allowed)

- Submitters recommended local purpose (river conservation) reserve "for ecological reasons", noting that "the block in question is adjacent to and sits on a bend of the Inangahua river; it contains a strip of indigenous forest, has potential for carbon capture through regrowth, has value for river protection and should not be disposed of".
- A submitter stated, "land in report acutely threatened habitat".
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. "disposal will lose the opportunity for regeneration and restoration"). A "precautionary policy" was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. "poor ecological representation in existing protected areas").
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The pastoral components of the area are highly modified, and its size and landscape context (bound by legal road within broader farmland, with no links to other public conservation land) limit the appropriateness and effectiveness of restoration. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, "and only then with the need to maintain the block's cultural, conservation & mahika-kai values".

I recommend these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. I note that any parts of the area identified to have substantive "conservation & mahika-kai values" are unlikely to pass the Conservation General Policy and legislative disposal tests.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that “change in status or disposal will affect the existing permissions”, noting that a licence is held for grazing of land adjacent to the Inangahua River.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing were put in place.

As these comments are not allowed, I recommend they are not accepted. Any conditions on disposal are not the subject of the public notice.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the area is small and not connected to other public conservation land, it has limited potential for restoration for carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land, which will protect the riparian vegetation present and support flood buffering.

### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.



## Inangahua River (Riverbed)

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve to give consideration to the presence of riverbed and riparian sections.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the 'riverbed' section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## **Local Purpose (River Conservation) Reserve - INA\_10\_2807840b**

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve, noting that the area "provides or protects actual or potential public access as the river moves" and that the area is of "angler interest".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the "information in the technical reports".
- A submission supported the highest possible classification for the land as it has "high cultural conservation value".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area "will be subject to flooding from climate change effects" and should be classified to promote re-vegetation and "become part of our emission reduction programme".

- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (gravel riverbed and a section of active river).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.
- A submitter who holds a concession over the area noted that if the land is disposed of, they are “the only ones who can have access to the land”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## INA\_11 – Winding Creek – 2807595

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Winding Creek	INA_11_2807595w	Conservation Park	Conservation Park	15	11

### DOC Conservation Values Report Description

A 285.6603-ha area in two disjunct blocks on hillside in the Coal Creek catchment, supporting indigenous forest adjoining Victoria Forest Park, and likely supporting a suite of forest bird species. There is access, but no tracks or facilities, and the only likely recreation use is occasional hunting. There may be goldmining history.

### Panel Recommendations

National Panel: Conservation park is considered to reflect the identified ecological values, and improve landscape continuity with adjacent Victoria Forest Park.

Mana Whenua Panel: Supports the recommendation of the Western South Island National Panel.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed classification, supported by submissions from Treaty partner organisations.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. indigenous forest with high level of predicted naturalness) are appropriately protected under the proposed classification. The area is surrounded by Victoria Forest Park, apart from a northern boundary with private land. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_11\_2807595w

### Support

#### Treaty Considerations (Allowed)

- Submissions stated they support the position of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of Ngāi Tahu and recognise Ngāi Tahu’s connection to their ancestral lands (e.g. “by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi”).

I recommend that these comments are accepted. My assessment is that the natural resources present (indigenous forest with high level of predicted naturalness) are appropriately protected under the proposed classification. I note that the Mana Whenua Panel has supported the notified intention.

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- A submitter advocated for classification as a wildlife management area as the area contains "at risk and/or threatened species" and "has ecological values that appear similar to those on other nearby land with a higher protected status".
- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. indigenous forest with high level of predicted naturalness) and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and "it appears to be an inefficient way of managing land for conservation". It was recommended to combine the proposed parks where the values are similar as this "provides greater opportunity for large landscape scale management".

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.

- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions expressed general concern about the low protection offered by conservation park and the potential for mining to occur (e.g. “Conservation Parks do not protect against the establishment of mines on conservation land”). suggesting a higher level of protection is needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.



#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_12 – Inangahua Riverbed – 2807872

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua Riverbed	INA_12_2807872x	Disposal	Disposal	9	32

### DOC Conservation Values Report Description

A 6.2068-ha area in and adjacent to Inangahua Riverbed. Largely pasture with some native forest, regenerating forest, and exotic shrubland with grazing concessions in place. Diversity and pattern are low, and rarity is moderate. Occasional fishing is the only likely recreation use.

### Panel Recommendations

National Panel: Disposal, as the natural values are considered low. The conservation area consists almost entirely of developed pasture, with limited conservation or cultural value.

Mana Whenua Panel: Disposal, as the area contains pastoral land which should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the area contains pastoral land.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_12\_2807872x

### Support

#### Access and Recreation (Allowed)

- A submitter stated they did not oppose disposal as there is “no recreational use”.

I recommend that these comments are accepted. This highly modified pastoral land does not hold any reported recreational value or provide practical public access to the river, supporting a disposal investigation.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The land consists primarily of highly modified pasture and holds low conservation values, supporting a disposal investigation.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu’s connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the highly modified nature of the pastoral components of this stewardship area (e.g. cleared of most native vegetation for grazing) justify referring this area to the Department to investigate the suitability of disposal.

- A submitter stated, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”. It was noted that “riparian access via new Marginal Strips is not guaranteed”.
- A submitter opposed disposal for “patches of river edges that are valued for recreation”, commenting that “some are just good to look at or to enjoy a roadside picnic”.
- Local purpose reserve was suggested as an alternative classification, with various purposes suggested such as river conservation, river access, or recreation access.

I recommend these comments are not accepted. The area does not provide practical access to the river from road or public conservation land, and there are no reported recreational uses other than access for occasional fishing. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips which will secure ongoing public access along the riparian corridor and enable any recreational angling to continue.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”. Another submitted commented that the “disposal area is within the river floodplain”, and suggested it should be retained “given the propensity for increased flooding with climate change”.
- Alternative classifications suggested included GPR (river floodplain), local purpose reserve (river conservation), scenic reserve or ecological reserve.
- It was noted that disposal “will not assist with a reduction in emissions from agriculture”.



I recommend these comments are not accepted. The small size of the area, its modified nature (largely pasture), and landscape context (not connected to other public conservation land, and situated within farmland) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land. This will protect the riparian vegetation present, supporting flood/erosion buffering.

### Ecology and Landscape (Allowed)

- Submitters recommended local purpose (river conservation) reserve “for ecological reasons”, noting that “the block in question is adjacent to and sits on a bend of the Inangahua river; it contains a strip of indigenous forest, has potential for carbon capture through regrowth, has value for river protection and should not be disposed of”. They also stated that the “adjacent landowner has encroached on PCL”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- A submitter opposed all disposal of stewardship land adjacent to rivers, stating, “despite the lack of use in this area of the river, the general practice of grazing and the subsequent degradation of the waterway will have wide reaching impacts that can affect downstream areas of the river. The Inangahua River is a major tributary of the Buller River, therefore effluent runoff from grazing could impact the quality of the Buller River”. Another submitter suggested the area is “better left as riparian strip, preventing erosion and pollution from intensive farming”, and citing examples where volunteer efforts have restored wetlands, which “could only have happened if the land had been kept in DOC ownership not disposed of”.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The pastoral components of the area are highly modified, and its small size and landscape context (adjacent to farmland not connected to other public conservation land) limit the appropriateness and effectiveness of restoration. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests. Further, any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter in opposition expressed “concern that change in status or disposal will affect the existing permissions”, noting that there is a grazing licence for part of the bed of Inangahua River and a grazing licence for land adjacent to Inangahua River.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing, setbacks and planting were put in place, and a submitter suggested riparian areas should be protected by covenant.

As these comments are not allowed, I recommend they are not accepted. Conditions of disposal are not the subject of public notice.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the area is small and not connected to other public conservation land, it has limited potential for restoration for carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land., which will protect the riparian vegetation present and support flood buffering.


#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter noted that this area is grazed under leases from two separate land holders and requested that in the process of sale the current lease holders are recognised and offered the land in the first instance.



As these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.



## INA\_12 – Inangahua River – 2807885

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River	INA_12_2807885y	Disposal	Disposal	9	33

### DOC Conservation Values Report Description

A 20.2761-ha area in and adjacent to Inangahua River. Largely pasture with some native forest, regenerating forest, and exotic shrubland with grazing concessions in place. Diversity and pattern are low, and rarity is moderate. Occasional fishing is the only likely recreation use.

### Panel Recommendations

National Panel: Disposal, as the natural values are considered low. The conservation area consists almost entirely of developed pasture, with limited conservation or cultural value.

Mana Whenua Panel: Disposal, as the area contains pastoral land which should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the area contains pastoral land.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_12\_2807885y

### Support

#### Access and Recreation (Allowed)

- A submitter stated they did not oppose disposal as there is “no recreational use”.

I recommend that these comments are accepted. This highly modified pastoral land is unlikely to hold recreational value and does not provide practical public access to the river, supporting a disposal investigation.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The land consists primarily of highly modified pasture and holds low conservation values, supporting a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu’s connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the highly modified nature of the pastoral components of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal.

- A submitter suggested, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submitters objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”. It was noted that “riparian access via new Marginal Strips is not guaranteed”.
- A submitter opposed disposal for “patches of river edges that are valued for recreation”, commenting that “some are just good to look at or to enjoy a roadside picnic”.
- Local purpose reserve was suggested as an alternative classification, with various purposes suggested such as river conservation, river access, or recreation access.

I recommend these comments are not accepted. The area does not provide practical access to the river from road or public conservation land. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor of the river.

### Climate Change and Natural Hazards (Allowed)

- Submitters opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- A submitter noted, “disposal likely means clearance and more farming, more emissions. Can this area be covenanted to protect the land from further clearance and allow regeneration to continue?”
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- Alternative classifications suggested included GPR (river floodplain), scenic reserve or ecological reserve.
- It was noted that disposal “will not assist with a reduction in emissions from agriculture”.

I recommend that these comments are not accepted. The area's highly modified nature and landscape context (adjacent to pasture within broader farmland, with no links to other conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land. This will protect the riparian vegetation present, supporting flood/erosion buffering.

### Ecology and Landscape (Allowed)

- Submitters recommended local purpose (river conservation) reserve “for ecological reasons”, noting that “the block in question is adjacent to and sits on a bend of the Inangahua river; it contains a strip of indigenous forest, has potential for carbon capture through regrowth, has value for river protection and should not be disposed of”. They also stated that the “adjacent landowner has encroached on PCL”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- A submitter opposed all disposal of stewardship land adjacent to rivers, stating, “despite the lack of use in this area of the river, the general practice of grazing and the subsequent degradation of the waterway will have wide reaching impacts that can affect downstream areas of the river. The Inangahua River is a major tributary of the Buller River, therefore effluent runoff from grazing could impact the quality of the Buller River”. Another submitter suggested the area is “better left as riparian strip, preventing erosion and pollution from intensive farming”, and citing examples where volunteer efforts have restored wetlands, which “could only have happened if the land had been kept in DOC ownership not disposed of”.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The area's highly modified nature and landscape context (adjacent to pasture within broader farmland, with no links to other conservation land) limit the appropriateness and effectiveness of retaining the area for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block's cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.



I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter in opposition expressed “concern that change in status or disposal will affect the existing permissions”, noting that there is a grazing licence for part of the bed of Inangahua River and a grazing licence for land adjacent to Inangahua River.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing, setbacks, and planting were put in place while another suggested riparian areas should be protected by covenant.

As these comments are not allowed, I recommend they are not accepted. Any conditions on disposal are not the subject of the public notice.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the area is small and not connected to other public conservation land, it has limited potential for restoration for carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land., which will protect the riparian vegetation present and support flood buffering.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter noted that this area is grazed under leases from two separate land holders and requested that in the process of sale the current lease holders are recognised and offered the land in the first instance.

As these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.

## INA\_12 – Inangahua River – 2807886

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River	INA_12_2807886a	Local Purpose (River Conservation) Reserve	Neutral	6	13

### DOC Conservation Values Report Description

An 8.9946-ha area in and adjacent to Inangahua River subdivided by power lines. Largely pasture with some native forest, regenerating forest, and exotic shrubland with grazing concessions in place. Diversity and pattern are low, and rarity is moderate. Occasional fishing is the only likely recreation use.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve is considered to appropriately reflect the identified values  
 Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_12\_2807886a

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve for the whole area, noting that it “provides or protects actual or potential public access as the river move” and that the area is of “angler interest”.

I recommend that these comments are not accepted for further consideration. The purpose of the notified classification provides insufficient detail to comment on whether it appropriately provides for the public recreational access described.

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.



## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed concern about the use of the area for grazing “when this can have huge implications on the waterways”, noting general opposition to “disposal of stewardship land adjacent to waterways into supposed grazing pasture” (e.g. “effluent runoff from grazing could impact the quality of the Buller River”).
- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels' recommendations and suggested that "more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems" were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as "they can have their status changed without notification".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- A submitter advocated for that the area be "retained for the future", describing "examples of patches of river edges that are valued for recreation some are just good to look at or to enjoy a roadside picnic, while others may provide valuable habitat or be allowed to revert to natural flora or forest over time".
- Submissions queried whether the proposed classification allows hunting, fishing and "provision for public access".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## INA\_13 – Swamp Creek Road - Rotokohu – 2807873

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Swamp Creek Road - Rotokohu	INA_13_2807873c	Scenic Reserve (a)	Neutral	13	5
Swamp Creek Road - Rotokohu (Pasture)	INA_13_2807873d	Disposal	Disposal	9	28

### DOC Conservation Values Report Description

A 20.9856-ha patch of lowland forest shrubland pasture on alluvial flats. The area is largely forested with areas of exotic forest and pasture (under grazing concession). This area is part of a larger forest ecosystem to the south, but to the north is modified farmland with channelised and diverted waterways.

### Panel Recommendations

National Panel: Scenic reserve (a), to improve continuity of landscape with the adjoining forest ecosystem.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. lowland forest shrubland).

## Scenic Reserve (a) - INA\_13\_2807873c

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.



- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Climate change and Natural Hazards (Allowed)

- A submitter noted that the “area has a substantial enough area of native bush to be protected for carbon sequestering and allowing regeneration of natural values”, advocating for protection from grazing.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## Swamp Creek Road - Rotokohu (Pasture)

### Panel Recommendations

National Panel: Disposal of the pastoral component within the assessment area.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are no/low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel has supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## Disposal - INA\_13\_2807873d

### Support

#### Access and Recreation (Allowed)

- A submitter stated they do not oppose disposal as there is "no likely recreational or climbing value".

I recommend that these comments are accepted. This highly modified pastoral components of the stewardship area do not hold any reported recreational value, supporting a disposal investigation.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The area recommended for disposal consists of modified pasture and holds low conservation values, supporting a disposal investigation.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the highly modified nature of the pastoral components of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.



## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.
- A submitter recommended that it should be investigated for a land swap, while another submitter suggested that the area “should be assessed on-site to ensure that remaining ecological and hydrological values are adequately buffered and linked”.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. The stewardship areas in question consist of modified pasture which do not provide practical access to rivers/waterbodies or other conservation land, and are unlikely to

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submitters recommended that the grazed area be retained and planted “as a permanent carbon sink”.
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submission suggested alternative classification options such as scenic reserve, ecological reserve, or conservation park instead.

I recommend that these comments are not accepted. Though the areas recommended for disposal are adjacent to the forested area (recommended as scenic reserve), they are small, consist of modified pasture, and are otherwise connected to farmland road. I consider that the size and landscape context of the areas mean their potential for restoration for carbon sequestration is limited and does not justify retention as public conservation land.

### Ecology and Landscape (Allowed)

- Submitters recommended reclassification as a conservation park and addition to Victoria Forest Park, suggesting that “the block is largely forested and has value providing carbon capture through regrowth of indigenous forest. Grazing concessions should be phased out in time”.
- Another submitter noted that the area is “part of a larger forested area to the south” and recommended reclassification as a scenic reserve, with replanting to occur.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur. Another submitter noted that “90% of our wetlands have already been removed”.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. Though the areas recommended for disposal are adjacent to the forested area (recommended as scenic reserve), they are small, consist of modified pasture, and are otherwise connected to farmland road. I consider that the size and landscape context of the areas mean restoration would not materially improve the integrity of the forested area, and does not justify retention as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submitters expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter opposed disposal based on “concern that change in status or disposal will affect the existing permissions”, noting a “grazing licence for grazing in the Inangahua River, 3.9 h”.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing were put in place.

As these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the areas recommended for disposal are small, modified, and connected to farmland, potential for restoration for carbon sequestration is limited and does not justify retention as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.



## INA\_14 – Inangahua River - Andersons Road – 2807604

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River - Andersons Road	INA_14_2807604b	Local Purpose (River Conservation) Reserve	Neutral	5	12

### DOC Conservation Values Report Description

A 3.7191-ha area made up of islands of vegetation, largely exotic, river gravels, and some native regeneration, on riparian margins of Inangahua River. While not diverse in terms of freshwater systems, a range of species could use this area. Little recreation use, except occasional anglers (but access is through private land). A grazing licence and an easement for a power line are in place.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve will help protect the identified threatened ecosystem.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_14\_2807604b

### Support

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.

- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (gravel riverbed and a section of active river).

- Submitters suggested a range of appropriate alternatives, including ecological area, wildlife management area, scenic reserve and GPR (climate mitigation). It was noted that the area contains naturally uncommon ecosystems.
- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that this comment is not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence and power line easement over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Support

##### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## INA\_14 – Inangahua River Andersons Road – 2807888

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River - Andersons Road	INA_14_2807888c	Local Purpose (River Conservation) Reserve	Neutral	5	12

### DOC Conservation Values Report Description

A 31.437-ha area made up of islands of vegetation, largely exotic, river gravels, developed farmland some native regeneration, on riparian margins of Inangahua River. Farmland is present on the river terraces on both sides of the river. While not diverse in terms of freshwater systems, a range of species could use this area. Little recreation use, except occasional anglers (but access is through private land). A grazing licence and an easement for a power line are in place.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve will help protect the identified threatened ecosystem.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_14\_2807888c

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

## Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (gravel riverbed and a section of active river).

- Submitters suggested a range of appropriate alternatives, ecological area, wildlife management area, scenic reserve and GPR (climate mitigation). It was noted that the area contains naturally uncommon ecosystems.
- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

## General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence and power line easement over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## INA\_14 – Waitahu River Island – 2807894

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Waitahu River Island	INA_14_2807894d	Local Purpose (River Conservation) Reserve	Neutral	6	13

### DOC Conservation Values Report Description

A 7.1605-ha area made up of river gravels, developed farmland some native regeneration, on riparian margins of Inangahua River. Farmland is present on the river terraces on both sides of the river. While not diverse in terms of freshwater systems, a range of species could use this area. Little recreation use, except occasional anglers (but access is through private land). A grazing licence and an easement for a power line are in place.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve will help protect the identified threatened ecosystem.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_14\_2807894d

### Support

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.

- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (river gravels and riparian margins).

- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.
- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence and power line easement over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submitter advocated that the area should be “disposed of to the adjoining farmers as there is already a lease over it and it is a small section of land isolated from other conservation areas left as river reserve”.
- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## INA\_14 – Inangahua River – 2807895

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River	INA_14_2807895e	Local Purpose (River Conservation) Reserve	Neutral	5	12

### DOC Conservation Values Report Description

A 3.7191-ha area made up of islands of vegetation, largely exotic, river gravels, developed farmland some native regeneration, on riparian margins of Inangahua River. Farmland is present on the river terraces on both sides of the river. While not diverse in terms of freshwater systems, a range of species could use this area. Little recreation use, except occasional anglers (but access is through private land). A grazing licence and an easement for a power line are in place.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve will help protect the identified threatened ecosystem.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_14\_2807895e

### Support

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.

- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (gravel riverbed and a section of active river).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence and power line easement over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## INA\_15 – Boatman Creek – 2807891

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Boatman Creek	INA_15_2807891f	Conservation Park	Neutral	12	10

### DOC Conservation Values Report Description

A 4.3315-ha area of forest and wetland at the northern end of Caplestone Ecological Area in Victoria Forest Park. Provides a habitat island for terrestrial fauna as they move out of Victoria Forest Park. May contain special flora in the wetland.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park will provide landscape continuity.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. small areas of scrub/native vegetation with a section of pākihi wetland) are appropriately protected under the proposed classification. The land is next to a section of the Victoria Forest Park and separated from other sections of the Victoria Forest Park by farmland and an active goldmine. The addition of the area to the Victoria Forest Park will provide consistent protection for the indigenous vegetation and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_15\_2807891f

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.

- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.
- A submitter suggested that the status does not recognise the "naturally uncommon ecosystems present" including "dunes and wetlands" and the landscape context instead recommending classification as an ecological area.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (e.g. small areas of scrub/native vegetation with a section of pākihi wetland) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the indigenous vegetation and landscape continuity. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and "it appears to be an inefficient way of managing land for conservation". It was recommended to combine the proposed parks where the values are similar as this "provides greater opportunity for large landscape scale management".

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that "Conservation Parks do not protect against the establishment of mines on conservation land".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is "politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel".
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.
- A submitter suggested the report was “short on actuals and facts” and did not represent the values as they understood them.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

- A submission stated it wasn’t clear why the area had been designated as a conservation park.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_15 – Boatman Creek - Caplestone – 2807892

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Boatman Creek - Caplestone	INA_15_2807892g	Conservation Park	Neutral	12	12

### DOC Conservation Values Report Description

A 52.4397-ha area of forest and wetland at the southern end of Caplestone Ecological Area in Victoria Forest Park. Provides a habitat island for terrestrial fauna as they move out of Victoria Forest Park. May contain special flora in the wetland.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park will provide landscape continuity.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. small areas of scrub/native vegetation with a section of pākihi wetland) are appropriately protected under the proposed classification. The land is next to a section of the Victoria Forest Park and separated from other sections of the Victoria Forest Park by farmland and an active goldmine. The addition of the area to the Victoria Forest Park will provide consistent protection for the indigenous vegetation and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_15\_2807892g

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.

- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”, “naturally uncommon ecosystems (including dunes and wetlands)”, advocating for classification as ecological area).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “add to Caplestone Ecological Area. Forest Park not well enough protected”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present (e.g. small areas of scrub/native vegetation with a section of pākihi wetland) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the indigenous vegetation and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.
- A submitter suggested the report was “short on actuals and facts” and did not represent the values as they understood them.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_16 – Boatman Creek - Caplestone – 2807893

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Boatman Creek - Caplestone	INA_16_2807893h	Conservation Park	Conservation Park	15	13

### DOC Conservation Values Report Description

A 381.5974-ha bell-shaped area of modified forest in various stages of regeneration, which has been mined both historically and currently. There are tracks, huts and relics associated with its mining history. The mines in this area have historical value for their success and contribution to Reefton. Mining and exploration are ongoing for gold, including drilling pads and accommodation, as well as new coal adits and tracks. DOC-managed tracks start here, based on historic pack tracks, and are popular for tramping, mountain biking and hut stays.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjacent Victoria Forest Park will provide landscape continuity and connectivity, particularly with regard to the historic features.

Mana Whenua Panel: Supports the recommendation of the Western South Island National Panel.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding substantial merit supported the notified classification as supporting the recreational values present. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel have signalled Ngāi Tahu interests associated with this stewardship area, particularly that “this conservation area is adjacent to Ngāi Tahu Forestry, an indication of Ngāi Tahu presence, interest and use of the land in this vicinity” and “Ngāi Tahu may have future aspirations for this land (such as forestry)”.

Given the Mana Whenua Panel support for the notified classification, I consider the classification is not inconsistent with the identified interests.

Rationale: My conclusion is that the natural resources present (e.g. regenerating indigenous forest and wetland) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)). J

## Conservation Park - INA\_16\_2807893h

### Support

#### Access and Recreation (Allowed)

- A submitter supported the classification as “logical” due to the “Kirwins Track and surrounding areas of Victoria FP”.

I recommend that these comments are accepted. The values identified are consistent with those recorded in the CVR and I agree that the proposed classification will support public access. The proposed conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Historic and Cultural Values (Allowed)

- A submitter noted that the area contains “important historic sites”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the historic resources present as described in the CVR. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### Treaty Considerations (Allowed)

- Submissions stated they support the position of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of Ngāi Tahu and recognise Ngāi Tahu’s connection to their ancestral lands (e.g. “by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi”).

I recommend that these comments are accepted. I note that the Mana Whenua Panel have supported the proposed classification, and therefore I consider that the notified intention is not inconsistent with the identified Ngāi Tahu interests. My assessment is that the natural resources present (e.g. regenerating indigenous forest and wetland) are appropriately protected under the proposed classification.

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present (e.g. the land “has ecological values that appear similar to those on other nearby land with a higher protected status”), suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. regenerating indigenous forest and wetland) and the points raised do not

warrant overturning the notified intention. This recommendation is further supported by the contiguous boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.
- A submitter suggested alternative classification as an ecological area to protect against further mining.
- A submitter opposed the classification as they were concerned the proposed status would impact existing mining permissions.
- A submitter suggested disposal of part of the land which was suitable for productive coal mining.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.



### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_17 – Waitahu River – 2807897

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Waitahu River	INA_17_2807897i	Conservation Park	Conservation Park	15	11

### DOC Conservation Values Report Description

A 46.2005-ha area with nearly a quarter appearing to be an active mining operation with coal storage, settling ponds and roads. There are areas of forest and shrubland at various stages of regeneration from a history of forest clearance from logging, fire and mining. A concession is held for fuel storage. There is some heritage value for the area's association with 19th and early 20th century gold mining.

### Panel Recommendations

National Panel: Conservation park, to improve landscape continuity with the adjacent Victoria Forest Park and accommodate the identified heritage values.

Mana Whenua Panel: Supports the recommendation of the Western South Island National Panel.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed classification, supported by submissions from Treaty partner organisations.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: My conclusion is that the natural and historic resources present (e.g. regenerating forest and shrubland; mining heritage) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_17\_2807897i

### Support

#### Treaty Considerations (Allowed)

- Submissions stated they support the position of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu's connection to their ancestral lands (e.g. "by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi").

I recommend that these comments are accepted. I agree that the natural and historic resources present (e.g. regenerating forest and shrubland; mining heritage) are appropriately protected under the proposed classification.

I note that the Mana Whenua Panel has supported the proposed classification.

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".

- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (regenerating forest and shrubland modified by clearance) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



### Permissions, Economic Factors and Land Use (Not Allowed)

- Submitters expressed general concern about the low protection offered by conservation park and the potential for mining, noting that “Conservation Parks do not protect against the establishment of mines on conservation land” (e.g. “No further mining and contamination of Ngai Tahu waterways in/on the Conservation Estate”).
- A submitter opposed the classification as they were concerned the proposed status would impact existing permissions.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_18 – Reefton – 2807899

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Reefton	INA_18_2807899j	Recreation Reserve	Neutral	8	4

### DOC Conservation Values Report Description

A 34.162-ha area consisting of one large eastern block and 12 small blocks (which look like vacant sections in Reefton township). Low gradient hillslope at the eastern end of Reefton township, which has had indigenous vegetation cleared, except for some small areas of secondary beech forest. It is a modified ecosystem with very little natural diversity or pattern. It could provide habitat for native birds, lizards and invertebrates. The community maintains two tracks and desires to establish a hub for mountain biking and walking from the town. There is coal mining history.

### Panel Recommendations

National Panel: Recreation reserve, to provide for the existing recreational use while protecting the identified ecological and historic values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of recreation reserve.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present are appropriately protected by the proposed classification (e.g. modified ecosystem with little natural diversity), while also reflecting the public access and recreational features.

## Recreation Reserve - INA\_18\_2807899j

### Support

#### Climate Change and Natural Hazards (Allowed)

- Submissions expressed support for high environmental protection “in light of the impacts of climate change such as the flooding in Nelson and West Coast regions”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as recreation reserve will support this outcome, to the extent compatible with the identified primary purpose. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submitters expressed general agreement with the recommendation without providing further justification, or expressed their preference for maximum protection.



- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Oppose

### Access and Recreation (Allowed)

- A submitter recommended “the hillside land be held... as recreational land use, to enable future purpose designed mountain bike trails as part of a greater plan to grow the economy of Reefton by way of multi night visitors riding the trails of Reefton and exploring its rich history”.

I recommend that these comments are not accepted. The suggestion to enable the creation of bike tracks is addressed by the proposed classification, with the land being held “for the purpose of providing areas for the recreation and sporting activities and the physical welfare and enjoyment of the public” (Reserves Act 1977, s.17(1)).

### Permissions, Economic Factors and Land Use (Not Allowed)

- It was recommended by the same submitter as above that “any and all flat land should be considered to be made available to the market to increase land stock to enable housing stock increase, which is needed as the town is lacking, and growing”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows gamebird hunting and sports fishing, and suggested provision should be made to ensure it can continue.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the proposed activities if authorised, for example, in a hunting permit, where consistent with preservation of the conservation values present.

## INA\_19 – Inangahua River – 2807898

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River (Riverbed)	INA_19_2807898l	Local Purpose (River Conservation) Reserve	Neutral	10	12
Inangahua River (Pasture)	INA_19_2807898m	Disposal	Disposal	10	31

### DOC Conservation Values Report Description

A 3.9429-ha modified terrace of exotic vegetation between the racecourse and Inangahua River. Native vegetation has been cleared and there is an active grazing consent. The area is partly developed and includes occupation – there is use associated with Reefton Racecourse. Although a small size, there is potential use as riparian margin protection against flooding, erosion and river shift.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve, as this area may assist river protection management.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the ‘riverbed’ section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_19\_2807898l

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve for the whole area, noting that it “provides or protects actual or potential public access as the river move” and that the area is of “angler interest”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## Climate change and Natural Hazards (Allowed)

- A submitter noted a need for “river protection to stop the river washing away a large proportion of the land”. It was suggested as preferable that the land is “sold to a more responsible owner to do some form of protection work”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

## General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment. Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.



## General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence in the area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## Inangahua River (Pasture)

### Panel Recommendations

National Panel: Disposal of the stable areas of developed pasture within the conservation area.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are no/low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel has supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## **Disposal - INA\_19\_2807898m**

### Support

#### Access and Recreation (Allowed)

- A submitter noted that there is "no likely recreational or climbing value".

I recommend that these comments are accepted. This highly modified pastoral land does not hold any reported recreational value or provide public access to the river, supporting a disposal investigation.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The land consists primarily of highly modified pasture and holds low conservation values, supporting a disposal investigation.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the highly modified nature of the pastoral components of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- The area's potential for recreational swimming use was noted.
- A submitter suggested that the area could be an Amenity Reserve with planting, noting that the river "has been fairly unstable here; it was once favoured for swimming and other adventures by the children of the town, but the change of course means that swimming holes are not there at present, and access is difficult. Another change in the riverbed could bring access and swimming holes back". They suggested that the area could be held as conservation land grazed in the interim, stipulating that the area should remain free of river protection work.
- One submitter noted "angler interest in the area".
- A submitter stated that "Several of the sites proposed for disposal appear to have recreational and camping value in NZMCA's opinion", recommending that these be reclassified as recreation reserves suitable for camping.
- Submissions objected to disposal on the grounds that this represents a loss of public access, particularly to rivers, and ability for future generations to enjoy these areas. They also expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that "appropriate mechanisms are used to ensure existing and future public use is maintained or improved". It was noted that access to rivers via marginal strips is not guaranteed.
- A submitter stated their opposition to disposal and recommended "reclassification as Local Purpose Reserve with appropriate purpose, including river conservation, river access, or recreation access, to ensure public access is retained in perpetuity".

I recommend these comments are not accepted. The pastoral component recommended for disposal does not provide practical access to the river, and access to the stewardship area itself is limited as it is via the Reefton Racecourse. Given these access limitations, my assessment is that the area (which is currently grazed) does not hold recreational values which justify retention as public conservation land. Further, any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor, and allow recreational uses such as angling or swimming to occur.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. "areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of").
- Submissions argued that disposal compromises future sustainability and climate mitigation options e.g. opportunities for restoration and carbon sequestration as well as flood/erosion buffering, or allowing room for natural river processes (e.g. "potential use as riparian margin protection against flooding, erosion and river shift", "helpful in controlling riverbed").
- A submitter noted that "In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)". Suggested alternative classification options included scenic reserve or "Ecological Reserve" instead.

I recommend that these comments are not accepted. The small size and landscape context of the area (adjacent to the Reefton Racecourse and other private land, not connected to any other public conservation land), and its highly modified nature (grazed and covered with exotic vegetation) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. The CVR states that the small size of the area means it does not have significant value as a buffer. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.



## Ecology and Landscape (Allowed)

- Submitters stated they prefer local purpose (river conservation for ecological reasons) reserve, noting that the area is “a modified riverbank ecosystem that is now covered in exotic vegetation that looks like it has been mown and is being grazed”.
- Submitters suggested that “future volunteer groups may plant it out” and noted that work was already occurring upstream (“the Reefton townspeople are already getting together to beautify The Strand, which is upstream of the bridge, and potentially they may extend their efforts further downstream”). Another submitter suggested the area should be “fenced and retained”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The highly modified nature of the area (grazed and covered with exotic vegetation) and its size and landscape context (adjacent to the Reefton Racecourse and other private land, not connected to any other public conservation land) limit the appropriateness and effectiveness of restoration, and do not warrant retention as public conservation land. Given that comments regarding potential volunteer restoration efforts are speculative, I suggest they should be given little weight. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land may provide an opportunity for riparian restoration.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified and grazed area is unlikely to hold substantive “conservation & mahika-kai values”.

## General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed concern that disposal would affect current permissions, noting the existence of a grazing licence for this area.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands”.

As these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the area is small and not connected to other public conservation land, it has limited potential for restoration for carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.

## INA\_20 – Inangahua River - Reefton – 2807901

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River - Reefton	INA_20_2807901k	Local Purpose (Community Use) Reserve	Local Purpose (Community Use) Reserve	12	6

### DOC Conservation Values Report Description

A 1.4383-ha highly modified riverbank and terrace on the north side of Inangahua River that is used as a carpark and recreation area (walking and picnicking), with toilets. There is little to no indigenous vegetation left and there are no freshwater species. The Department is currently trying to negotiate an exchange of this land for Alfred River (unformed road around Station Creek).

### Panel Recommendations

National Panel: Local purpose (community use) reserve, to appropriately reflect the identified values. It is noted that the Department is currently trying to negotiate an exchange of this land for Alfred River (unformed road around Station Creek).

Mana Whenua Panel: Supports the recommendation of the Western South Island National Panel.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of local purpose (community use) reserve.

Summary of accepted submissions: Those submissions accepted as holding merit noted that this was outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu. Also accepted were those expressing general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed classification, supported by submissions from Treaty partner organisations.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will facilitate the existing community uses of the area, while reflecting the modified nature of the natural resources present (e.g. used as a carpark and recreation area (walking and picnicking) with toilets, no indigenous vegetation left, and there are no freshwater species).

## Local Purpose (Community Use) Reserve - INA\_20\_2807901k

### Support

#### Treaty Considerations (Allowed)

- Submissions stated they support the position of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu’s connection to their ancestral lands (e.g. “by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi”).
- Submitter supported proposed local purpose reserves “where there has been identification of specific cultural and historical values”.



I recommend that these comments are accepted. I agree that the proposed classification will facilitate the ongoing community use of the area, and reflects the modified nature of the natural resources present. I note that the Mana Whenua Panel has supported the proposed local purpose reserve.

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the "information in the technical reports".
- A submission supported the highest possible classification for the land as it has "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Oppose

#### Access and Recreation (Allowed)

- A submitter noted that the area is "partly used as restricted freedom camping site" and should be classified as a recreation reserve to protect the recreation values present.
- A submitter noted historic recreation use of the area, advocating for classification as Amenity Reserve (e.g. "it was once favoured for swimming and other adventures by the children of the town, but the change of course means that swimming holes are not there at present").

I recommend that these comments are not accepted. The concerns raised are addressed by the proposed classification and they do not justify overturning notified intent. The proposed classification will facilitate the existing community uses of the area, while reflecting the modified nature of the natural resources present (e.g. used as a carpark and recreation area (walking and picnicking) with toilets, no indigenous vegetation left, and there are no freshwater species).

#### Ecology and Landscape (Allowed)

- A submitter opposed the proposed classification without suggesting an alternative, noting the Panels' "failure to provide any details about the primary purpose of the local purpose reserve so submitters can be assured that the local purpose reserve will protect the land's ecological values". It was noted that "the ecological and other values of a local purpose reserve can be damaged or removed if this is necessary to achieve the local purpose".

I recommend that these comments are not accepted. My assessment is that the primary purpose of the proposed classification, being community use, can be considered self-explanatory. The proposed classification will appropriately facilitate the existing community uses of the area, while reflecting the modified nature of the natural resources present (e.g. used as a carpark and recreation area (walking and picnicking), with toilets, no indigenous vegetation left, and there are no freshwater species).

#### Climate change and Natural Hazards (Allowed)

- A submitter opposed the proposed classification without suggesting an alternative, noting that the area "may need to be considered for future flood protection for Reefton".

I recommend that these comments are not accepted. The concerns raised do no warrant overturning the notified intent. The legislation does not provide for absolute protection from development (such as the proposed flood protection works), rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions.

#### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

As these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

## INA\_21 – Inangahua River – 2807900

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River (Riverbed)	INA_21_2807900n	Local Purpose (River Conservation) Reserve	Neutral	9	12
Inangahua River (Pasture)	INA_21_2807900o	Disposal	Disposal	8	31

### DOC Conservation Values Report Description

A 2.0037-ha area of modified riverbank and terrace on the south side of the Inangahua River. Currently grazed (with permissions) and developed, with no threatened, at-risk, or freshwater species recorded. It may receive some recreation use from the Reefton township.

### Inangahua River (Riverbed)

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve, to protect the identified values of this small part of this area within the gravel riverbed itself.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the 'riverbed' section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_21\_2807900n

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve for the whole area, noting that it "provides or protects actual or potential public access as the river move" and that the area is of "angler interest".

I recommend that these comments are not accepted for further consideration. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the "information in the technical reports".
- A submission supported the highest possible classification for the land as it has "high cultural conservation value".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submitter suggested the area "may need to be considered for future flood protection for Reefton".
- A submission expressed concern that the area "will be subject to flooding from climate change effects" and should be classified to promote re-vegetation and "become part of our emission reduction programme".
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the "important conservation outcomes that could be achieved in the future".
- A submitter advocated for government purpose (river floodplain) reserve to provide "opportunities for ecosystem restoration in response to flood events or coastal erosion" and "opportunities for carbon sequestration".

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification "provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development", citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- A submission opposed the classification as it does not address management at "an ecosystem or catchment level" and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration "to the very high and nationally important natural conservation values of the rivers".
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

## General (Allowed)

- A submitter opposed the proposed classification as it "gives no greater protection than the current Stewardship status".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels' recommendations and suggested that "more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems" were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as "they can have their status changed without notification".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and "provision for public access".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## Inangahua River (Pasture)

### Panel Recommendations

National Panel: Disposal should be considered for this stable area of developed pasture.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining, and noted that there are low recreational values. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel has supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## **Disposal - INA\_21\_28079000**

### Support

#### Access and Recreation (Allowed)

- A submitter noted that there is "no likely recreational or climbing value".

I recommend that these comments are accepted. This highly modified pastoral land does not hold any reported recreational value or provide public access to the river, supporting a disposal investigation.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The land consists primarily of highly modified pasture and holds low conservation values, supporting a disposal investigation.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the highly modified nature of the pastoral components of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.



## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter stated that “Several of the sites proposed for disposal appear to have recreational and camping value in NZMCA’s opinion”, recommending that these be reclassified as recreation reserves suitable for camping.
- One submitter noted “angler interest in the area”.
- Submissions objected to disposal on the grounds that this represents a loss of public access, particularly to rivers, and ability for future generations to enjoy these areas. They also expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”. It was noted that access to rivers via marginal strips is not guaranteed.
- A submitter stated their opposition to disposal and recommended “reclassification as Local Purpose Reserve with appropriate purpose, including River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”.

I recommend these comments are not accepted. The area does not provide practical access to the river from road or public conservation land, and there are no current reported recreational uses which warrant retention as public conservation land. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor and allow any angling to continue.

### Climate Change and Natural Hazards (Allowed)

- Submitters suggested that the area should be retained due its potential benefit for flood protection (e.g. “may need to be considered for future flood protection for Reefton”, “helpful in controlling riverbed”). One submitter recommended GPR (river floodplain).
- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- Suggested alternative classification options included scenic reserve or “Ecological Reserve” instead.

I recommend that these comments are not accepted. The small size of the area and its highly modified nature limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. The CVR states that the small size of the area means it does not have significant value as a buffer. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land. This will protect any riparian vegetation present, supporting flood/erosion buffering.

## Ecology and Landscape (Allowed)

- Submitters recommended “Local Purpose (River Conservation for ecological reasons) Reserve”, and suggested grazing concessions should be “phased out in time”. Another submitter proposed the area should be “fenced and retained”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”, “retention of good opportunities for restoration of depleted indigenous ecosystems”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The highly modified nature of the area (grazed with low naturalness) and its small size and landscape context (right outside Reefton township and not connected to any other public conservation land) limit the appropriateness and effectiveness of restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

## General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.

- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing were put in place.

As these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. As the area is small and not connected to other public conservation land, it has limited potential for restoration for carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land, which will protect the riparian vegetation present and support flood buffering.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As these comments are not allowed, I recommend they are not accepted.



## INA\_22 – Inangahua River - Reefton (South) – 2807902

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River - Reefton (South)	INA_22_2807902I	Local Purpose (River Conservation) Reserve	Neutral	5	12

### DOC Conservation Values Report Description

A 0.0523-ha sliver of riverbank, now covered in exotic trees and grasses. It is directly adjacent to Reefton township and includes a tiny part of the river. It is likely to receive some recreation use associated with people accessing and using the river.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve, to provide for recreation activities and river protection works.  
Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation).

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve INA\_22\_2807902I

### Support

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submitter suggested the area “may need to be considered for future flood protection for Reefton”.
- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.

- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



## INA\_23 – Otututu Valley – 2806882

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Otututu Valley	INA_23_2806882m	National Park		6040*	22
Otututu Valley	INA_23_2806882n		Stewardship	12	39

### DOC Conservation Values Report Description

A 751.8832-ha area covering parts of the Mt McHardy to Mt Stevenson Range, with high tussock alpine tops and beech-forested slopes draining into the glaciated valleys of Stony Creek, Maimai Creek and Otututu/Rough River. A fine representation of an altitudinal sequence in indigenous vegetation, with gradients in vegetation and fauna due to variations in not only altitude, but also aspect and geology. Recreation includes hunting, fishing, and use of an official tramping track. Permissions are in place for telecommunications purposes.

### Panel Recommendations

National Panel: National park, to reflect and protect the identified values. There is a high level of representativeness and naturalness with the area providing complementary conservation values to the adjacent Paparoa National Park.

Mana Whenua Panel: Retain as stewardship land pending further policy work or legal reform, based on the tribal position that the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi as it alienates Ngāi Tahu from their ancestral lands.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, by referring this area to the NZCA for its consideration on the suitability of a national park classification in accordance with the relevant policy and procedures, including Policy 6 of the General Policy for National Parks and Section 4 of the Conservation Act 1987.

Summary of accepted submissions: The submissions accepted as holding merit supported the proposed national park investigation to protect the area's natural values, facilitate recreational access and improve climate change mitigation. Submitters referenced specific natural resources which were noted to be of high value and similar in nature to the adjoining national park.

Section 4 and Treaty principles: The Mana Whenua Panel opposed the proposed national park referrals, supported by submissions from Treaty partner organisations. Te Rūnanga o Ngāi Tahu oppose all additions to national parks within the Ngāi Tahu takiwā as "the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi (as required by section 4 of the Conservation Act 1987) as it alienates Ngāi Tahu from our ancestral lands".

I note that my s.49 recommendations and your decision on whether to refer this area to the NZCA for their consideration must give effect to Treaty principles independently of the NZCA's section 4 obligations.

Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present are of a similar nature to the adjacent national park, and warrant proceeding with a referral to the NZCA. Giving effect to Section 4 of the Act includes taking reasonable steps to actively protect the identified Treaty partner interests, but this obligation is not absolute and unqualified, as this would be inconsistent with DOC's other statutory responsibilities.

\* This figure includes 5,976 submissions made using a Forest and Bird template.

Referring this area to the NZCA for their consideration provides an opportunity for the NZCA to further assess the natural and historic resources present, and explore specific Ngāi Tahu interests and aspirations, including their consideration as to what giving effect to Treaty principles may require.

Rationale: My conclusion, considering those submissions accepted, is that the natural and historic resources present warrant referral to the NZCA for their consideration as per the process set out in Chapter 3 of the introduction to this Summary of Submissions Report.

## National Park (Paparoa) - INA\_23\_2806882m

### Support

#### Access and Recreation (Allowed)

- Submitters outlined the recreation value of the area (e.g. “The Otututu River has high recreation values in terms of tramping”, “as a wild river to approach the heart of the Paparoa Wilderness Area centred on Mt Uriah”, “Mt McHardy to Mt Epping also have significant recreational values in terms of tramping”).
- A submitter supported the recommendation as it guarantees access rights for the public (e.g. “protect the outstanding recreational, landscape and ecological values for current and future generations”).

I recommend that these comments are accepted. These comments hold merit under the Conservation Act as they support promotion of recreation that is not inconsistent with the preservation of the natural and historic resources present. Under a national park classification “the public shall have freedom of entry and access” subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)(e)).

#### Climate Change and Natural Hazards (Allowed)

- Submissions suggested that suitable stewardship land should be incorporated into adjacent conservation areas to support climate change mitigation, and that the protection of the area was especially important in the context of climate change (e.g. “for ecosystem services, for climate stability”, “given the biodiversity and climate crisis we are facing”, “with climate change starting to bite, our indigenous forests and wetlands are vital carbon sinks”).

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as national park will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### Ecology and Landscape (Allowed)

- Submitters noted the ecological value of the area (e.g. “from high alpine tussock tops down the beech forested slopes and into the glaciated valley”, “flora and fauna vary with altitudinal sequence, aspect and geology”, “common, threatened, at-risk and distinct species are present”, “three genetically distinct large Powelliphanta land snail taxa are present in the subalpine and alpine zones”).
- Submissions supported reclassification as a national park based on the land holding similar or higher values to the adjacent national parks (e.g. “they include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands”, “adjacent to a National Park, and ecologically contiguous with it”, “the area is sandwiched between Paparoa National Park and the Paparoa Wilderness Area”).
- Submitters extolled the benefits of a national park classification, noting comments such as that it will “expand ecological sequences”, “provide additional habitat for rare and threatened species to move through the landscape”, “in many cases the conservation values of the land parcel and adjacent national park are indistinguishable” and provide increased “corridors” and “connectivity”, with submissions describing current land delineations as “historic and arbitrary” rather than informed by ecological principles (e.g. “part of contiguous habitat for many species and provides a habitat corridor for species movement”).

- Submissions highlighted the value of a national park classification, with one submitter calling it the “pinnae of conservation land protection”, noting this as appropriate for areas of such high ecological value (e.g. “to protect intrinsic values of our Gondwana heritage”).

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. Characteristic primary forest is dominated by silver beech (*Lophozonia menziesii*) on the mid and upper slopes, and in riparian strips on cold valley bottoms), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

### Treaty Considerations (Allowed)

- Submissions in support of national parks noted a desire to “see the concerns of mana whenua addressed”, with some noting specific support for areas where mana whenua had not identified site-specific cultural values for the land.
- Submitters advocated for changes to management or legislative frameworks to reflect Treaty principles and to ensure free access and use of national parks for cultural, traditional, historical, and customary purposes, while ensuring that natural values are preserved and protected (e.g. “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed”). It was suggested that Mana Whenua Panel concerns need to be “debated on a large scale rather than through this reclassification exercise”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Several submissions expressed general support for all additions to national parks without providing further details, or expressed their desire for maximum protection of natural values across all stewardship land (e.g. “it must stay in DOC hands”).
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submission supported the expansion of the Paparoa National Park based on anticipated benefits for tourism in the area, noting that the presence of attractions like the Paparoa Great Walk and the Coast Road Highway has led to investments in tourism-related industries.
- A submission noted that national park status protects against “environmentally degrading activities such as mining and clearing the land for further agriculture”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.
- A submitter queried the lack of terms of reference for the Mana Whenua Panel and “its method of decision-making”, raising concern “that commercial concerns could take precedence over protecting the natural values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.
- A submission sought for public conservation land to be restored and rehabilitated to maintain buffer zones and ecological diversity.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submission stated opposition to any reclassification unless it provides explicitly for access, including helicopter landings, sports fishing and gamebird hunting, or stated opposition as national park status “excludes hunting for native species which are classified as gamebirds under the Wildlife Act, and which are managed as gamebirds (such as Pūkeko and Paradise Shelduck)”.
- A submission expressed concern about loss of recreation opportunities and access (including dog walking) suggesting that other classifications, such as conservation park, may provide a better balance between recreational enjoyment and protection of natural values.
- A submission recommended recreation reserve where areas have high cultural or recreational value to the public.

I recommend that these comments are not accepted. The methods of appreciation and recreational enjoyment proposed (dog access, hunting of indigenous avifauna) are potentially incompatible with protecting and preserving the natural resources described in the CVR, and the points raised do not justify overturning the notified intention. Although under a national park classification “the public shall have freedom of entry and access”, this is subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)).

### Ecology and Landscape (Allowed)

- A submitter noted that the area has “great altitudinal sequences and is part of the larger Paparoa range”, advocating for addition to the “adjacent Fletcher Creek Ecological Area and/or Te Wharau Wildlife Management Area/Saxton EA”.
- Submissions suggested that the ecological values of the land are not high enough to meet the standard for national park classification, characterising the area as “not so unique or scientifically important to meet the standard set by the National Parks Act”. It was suggested that recreation reserve or scenic reserve would ensure sufficient protection but are less restrictive.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. Characteristic primary forest is dominated by silver beech (*Lophozonia menziesii*) on the mid and upper slopes, and in riparian strips on cold valley bottoms) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Several submissions opposed the proposed national park investigation whilst supporting the proposal to retain the area in stewardship, pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective. This follows a Ngāi Tahu tribal position that a national park classification “obstructs Ngāi Tahu from maintaining ancestral relationships with the whenua, obstructs kaitiaki

rights and responsibilities, limits the meaningful involvement of Ngāi Tahu in decision-making processes, and is less enabling of customary practices that are fundamental to sustaining tribal identity and mana”.

- A submitter opposed national park classification on the basis that it “does not allow for mana whenua of the area to be involved in its care in the same way that Stewardship land does” and “recognises Māori and mana whenua as holding equal interest in the land as New Zealanders”. It was suggested that “classifying this land to National Park land, goes against the Crown obligations under Te Tiriti o Waitangi and even under the principles of Treaty of Waitangi”.

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated general opposition to national park classification, support for leaving the land in stewardship, or expressed support for the recommendations made by the Mana Whenua Panel, without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed concern that “change in status or disposal will affect the existing permissions”. They noted that there are various concessions in place (e.g. “concession licence for telecommunication facilities at Mt Raoulia, Concession easement for several telecommunications sites. Funding for the sites was provided by grants from Crown Infrastructure Partners to build the new sites and provide internet in rural areas”).
- Submissions expressed opposition to the proposed national park classification as being “too restrictive” (e.g. “tying even more land up in restrictive legislation”) and not in the best interests of the public as it would “have negative impact on the potential economic benefit derived from mineral resource extraction”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.
- A submission expressed the view that national park classification does not equate to effective protection from introduced pests or predators.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Retain in Stewardship - INA\_23\_2806882n

*The comments received in relation to the Mana Whenua Panel recommendation are summarised below and have been considered in relation to the notified proposal when forming s.49 allow/accept recommendations.*

## Support

### Ecology and Landscape (Allowed)

- A submission suggested that there was insufficient evidence of the conservation value and characteristics to justify a national park classification.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. Characteristic primary forest is dominated by silver beech (*Lophozonia menziesii*) on the mid and upper slopes, and in riparian strips on cold valley bottoms) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Submissions supported retaining land in stewardship on the basis that the Mana Whenua Panel recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu's claim and connection to their ancestral lands (e.g. "by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi", "National Parks have stringent preservation and protection which obstruct Ngāi Tahu from maintaining ancestral relationships with the whenua").
- A submission suggested that the area "must remain as stewardship land pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective".

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA's consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated support for the proposed classification or agreement with the Mana Whenua Panel without providing further details or agreed they reflected the "information in the technical reports".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

A submitter expressed concern that "change in status or disposal will affect the existing permissions". They noted that there are various concessions in place (e.g. "concession licence for telecommunication facilities at Mt Raoulia, Concession easement for several telecommunications sites. Funding for the sites was provided by grants from Crown Infrastructure Partners to build the new sites and provide internet in rural areas").

- A submitter stated that reclassifying land as national park, or other classifications which fall under Schedule 4, could have economic consequences by excluding mineral extraction and other activities on that land. The potential loss of opportunities resulting from these restrictions was seen as damaging, particularly in terms of mineral extraction and site rehabilitation.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these classifications provide "more than adequate legal protection".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission suggested that a holistic view, considering mineral prospectivity and other economic, social, and cultural considerations, should be taken when reclassifying stewardship land.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## Oppose

### Ecology and Landscape (Allowed)

- Submissions advocated for national park reclassification as the land has high conservation values which are equivalent or similar to the adjacent national parks (e.g. classification should be “based upon ecological and scenic values that are similar to adjoining national parks”, “Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park”, and the “nationally significant ecological systems and natural areas” present).
- One submission highlighted that the land has “high conservation values, equivalent to those in the area included in the park when it was formed 45 years ago. They include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands than is currently in the park”.

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. Characteristic primary forest is dominated by silver beech (*Lophozonia menziesii*) on the mid and upper slopes, and in riparian strips on cold valley bottoms), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

- One submission recommended reclassification as a conservation park, or suggested a scenic reserve or recreation reserve to ensure sufficient protection in areas where there is potential risk of damaging activities such as mining.

I recommend that these comments are not accepted. My assessment is that the natural resources warrant referring this area to the NZCA for its recommendation as to the suitability of a national park addition. The points raised do not justify overturning the notified intention.

### Treaty Considerations (Allowed)

- A submitter opposed “Mana Whenua’s blanket opposition to adding areas of stewardship land to National Parks”, suggesting that “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed, as set out in s.4 of the National Parks Act 1980”.
- A submitter suggested that the proposal to retain the area in stewardship “goes beyond the obligation to give effect to the Treaty of Waitangi”, advocating that “an area with high conservation values should be reclassified to reflect that value”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated general opposition to the classification without providing further justification, expressed preference for reclassification as a national park due to factors such as the “high protection” provided, or suggested reclassification as either scenic reserve or conservation park is preferable to retaining the land in stewardship.
- A submission sought the “highest possible classification” due to the land’s “high cultural conservation value”.
- A submission opposed retaining land in stewardship, describing it as a “meaningless recommendation”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submitter advocated for a national park classification to prevent the “creation of mines that will devastate the local areas”.
- A submitter raised concern that leaving the area in stewardship “opens the door to commercial or extractive activities”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- A submission queried the extent of land in South Westland not included in the reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_23 – Mai Mai - Te Wharau – 2806938

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Mai Mai - Te Wharau (North)	INA_23_2806938t	Wildlife Management Area	Neutral	12	12
Mai Mai - Te Wharau (South)	INA_23_2806938u	National Park		6027*	22
Mai Mai - Te Wharau (South)	INA_23_2806938v		Stewardship	11	29

### DOC Conservation Values Report Description

A 751.8832-ha area split into two areas. The northern section covers the lower Te Wharau River gorge and its steep beech-clad valley slopes, and the south block covers the Mt McHardy to Mt Stevenson Range, with high tussock alpine tops and beech-forested slopes draining into the glaciated valleys of Stony Creek, Maimai Creek and Otututu/Rough River. A fine representation of an altitudinal sequence in indigenous vegetation, with gradients in vegetation and fauna due to variations in not only altitude, but also aspect and geology. Recreation includes hunting, fishing and use of an official tramping track. Permissions are in place for telecommunications purposes.

### Mai Mai - Te Wharau (North)

#### Panel Recommendations

National Panel: Wildlife management area, to rationalise the boundary of the existing wildlife management area, improve landscape continuity, and provide protection for the identified endangered species.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of wildlife management area for the 'North' portion of this stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as reflecting the notable natural resources present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present. The contiguous nature of the adjoining Te Wharau Wildlife Management Area further supports your notified intention.

## Wildlife Management Area - INA\_23\_2806938t

### Support

#### Ecology and Landscape (Allowed)

- Submitters supported the recommendation based on the area's position adjacent to an existing wildlife management area (Te Wharau Wildlife Management Area) and its "high wildlife values".

\* This figure includes 5,976 submissions made using a Forest and Bird template.



I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the Te Wharau Wildlife Management Area further supports your notified intention.

#### General (Allowed)

- Submitters expressed general agreement with the recommendation without providing further justification, or expressed their preference for maximum protection.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Oppose

#### Access and Recreation (Allowed)

- Reclassification as a national park was proposed, with a submitter noting that “The Otututu River has high recreation values in terms of tramping”, “as a wild river to approach the heart of the Paparoa Wilderness Area centred on Mt Uriah. In addition, the tops from Mt McHardy to Mt Epping also have significant recreational values in terms of tramping, not identified by the national panel”.

I recommend that these comments are not accepted. The proposed classification does not prohibit public access for tramping activities, and the points raised do not justify overturning the proposed classification. I note that the CVR recognises that Giles Creek Track (directly adjacent to the assessment area) is an unofficial route up to Mt Steele and to the north (through Te Wharau Wildlife Management Area).

#### Ecology and Landscape (Allowed)

- Submissions advocated for national park reclassification, noting that the area is connected to Paparoa National Park and Wilderness Area with similar ecological values (“The area is sandwiched between Paparoa National Park and the Paparoa Wilderness Area. The area has high ecological and landscape value. We note that the area also acts as a buffer to the Paparoa Wilderness Area”, “part of the wider Paparoa National Park landscape”, “These areas have high conservation values, equivalent to those in the area included in the park when it was formed 45 years ago. They include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands than is currently in the park, and have high wildlife values. Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park”).
- Submissions also suggested reclassification as an ecological area, noting that it is connected to other ecological areas and has similar values (“Great altitudinal sequences and part of the larger Paparoa range. Join with adjacent Fletcher Creek Ecological Area and/or Te Wharau Wildlife Management Area/Saxton EA”, “land parcel lies adjacent to land that has a higher protected status than that proposed; land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My view is that the natural resources identified in the CVR are appropriately protected and preserved by the proposed classification, and the material raised does not warrant reconsideration of the notified intention. The contiguous nature of the Te Wharau Wildlife Management Area further supports your notified intention.

#### General (Allowed)

- Submissions recommended reclassification as a national park without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed concern that “change in status or disposal will affect the existing permissions”. They noted that there are various concessions in place (e.g. “concession licence for telecommunication facilities at Mt Raoulia, Concession easement for several telecommunications sites. Funding for the sites was provided by grants from Crown Infrastructure Partners to build the new sites and provide internet in rural areas”).
- A submitter suggested that the recommendation would have a “negative impact on the potential economic benefit derived from mineral resource extraction”, and noted that the area has a mineral permit granted with “serious legal implications if reclassified”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows gamebird hunting and sports fishing, and suggested provision should be made to ensure it can continue.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the proposed activities if authorised, for example, in a hunting permit, where consistent with preservation of the conservation values present.

## Mai Mai - Te Wharau (South)

### Panel Recommendations

National Panel: National park, to reflect and protect the identified values. There is a high level of representativeness and naturalness with the area providing complementary conservation values to the adjacent Paparoa National Park.

Mana Whenua Panel: Retain as stewardship land pending further policy work or legal reform, based on the tribal position that the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi as it alienates Ngāi Tahu from their ancestral lands.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'South' portion of this stewardship, by referring the area to the NZCA for its consideration on the suitability of a national park classification in accordance with the relevant policy and procedures, including Policy 6 of the General Policy for National Parks and Section 4 of the Conservation Act 1987.

Summary of accepted submissions: The submissions accepted as holding merit supported the proposed national park investigation to protect the area's natural values, facilitate recreational access and improve climate change mitigation. Submitters referenced specific natural resources which were noted to be of high value and similar in nature to the adjoining national park.

Section 4 and Treaty principles: The Mana Whenua Panel opposed the proposed national park referrals, supported by submissions from Treaty partner organisations. Te Rūnanga o Ngāi Tahu oppose all additions to national parks within the Ngāi Tahu takiwā as "the addition of land to national parks will not give effect to the principles of the Treaty of Waitangi (as required by section 4 of the Conservation Act 1987) as it alienates Ngāi Tahu from our ancestral lands".

I note that my s.49 recommendations and your decision on whether to refer this area to the NZCA for their consideration must give effect to Treaty principles independently of the NZCA's section 4 obligations.

Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present are of a similar nature to the adjacent national park, and warrant proceeding with a referral to the NZCA. Giving effect to Section 4 of the Act includes taking reasonable steps to actively protect the identified Treaty partner interests, but this obligation is not absolute and unqualified, as this would be inconsistent with DOC's other statutory responsibilities.

Referring this area to the NZCA for their consideration provides an opportunity for the NZCA to further assess the natural and historic resources present, and explore specific Ngāi Tahu interests and aspirations, including their consideration as to what giving effect to Treaty principles may require.

Rationale: My conclusion, considering those submissions accepted, is that the natural and historic resources present warrant referral to the NZCA for their consideration as per the process set out in Chapter 3 of the introduction to this Summary of Submissions Report.

## **National Park - INA\_23\_2806938u**

### Support

#### Access and Recreation (Allowed)

- Submitters outlined the recreation value of the area (e.g. "The Otututu River has high recreation values in terms of tramping", "as a wild river to approach the heart of the Paparoa Wilderness Area centred on Mt Uriah", "Mt McHardy to Mt Epping also have significant recreational values in terms of tramping").
- Submitter supported the recommendation as it guarantees access rights for the public (e.g. "protect the outstanding recreational, landscape and ecological values for current and future generations").



I recommend that these comments are accepted. These comments hold merit under the Conservation Act as they support promotion of recreation that is not inconsistent with the preservation of the natural and historic resources present. Under a national park classification “the public shall have freedom of entry and access” subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)(e)).

### Climate Change and Natural Hazards (Allowed)

- Submissions suggested that suitable stewardship land should be incorporated into adjacent conservation areas to support climate change mitigation, and that the protection of the area was especially important in the context of climate change (e.g. “for ecosystem services, for climate stability”, “given the biodiversity and climate crisis we are facing”, “with climate change starting to bite, our indigenous forests and wetlands are vital carbon sinks”).

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as national park will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

### Ecology and Landscape (Allowed)

- Submitters noted the ecological value of the area (e.g. “from high alpine tussock tops down the beech forested slopes and into the glaciated valley”, “flora and fauna vary with altitudinal sequence, aspect and geology”, “common, threatened, at-risk and distinct species are present”, “three genetically distinct large Powelliphanta land snail taxa are present in the subalpine and alpine zones”).
- Submissions supported reclassification as a national park based on the land holding similar or higher values to the adjacent national parks (e.g. “they include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands”, “adjacent to a National Park, and ecologically contiguous with it”, “the area is sandwiched between Paparoa National Park and the Paparoa Wilderness Area”). Submitters noted that “it seemed an oversight to me that it had never been added to the park”.
- Submitters extolled the benefits of a national park classification, noting comments such as that it will “expand ecological sequences”, “provide additional habitat for rare and threatened species to move through the landscape”, “in many cases the conservation values of the land parcel and adjacent national park are indistinguishable” and provide increased “corridors” and “connectivity”, with submissions describing current land delineations as “historic and arbitrary” rather than informed by ecological principles.
- Submissions highlighted the value of a national park classification, with one submitter calling it the “pinnacle of conservation land protection”, noting this as appropriate for areas of such high ecological value (e.g. “to protect intrinsic values of our Gondwana heritage”).

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. a fine representation of an altitudinal sequence in indigenous vegetation, with gradients in vegetation and fauna due to variations in not only altitude, but also aspect and geology), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

### Treaty Considerations (Allowed)

- Submissions in support of national parks noted a desire to “see the concerns of mana whenua addressed”, with some noting specific support for areas where mana whenua had not identified site-specific cultural values for the land.
- Submitters advocated for changes to management or legislative frameworks to reflect Treaty principles and to ensure free access and use of national parks for cultural, traditional, historical, and customary purposes, while ensuring that natural values are preserved and protected (e.g. “Mana Whenua must be assured free access and use

of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed"). It was suggested that Mana Whenua Panel concerns need to be "debated on a large scale rather than through this reclassification exercise".

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA's consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Several submissions expressed general support for all additions to national parks without providing further details, or expressed their desire for maximum protection of natural values across all stewardship land (e.g. "add to National Park or Paparoa Wilderness area").
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submission supported the expansion of the Paparoa National Park based on anticipated benefits for tourism in the area, noting that the presence of attractions like the Paparoa Great Walk and the Coast Road Highway has led to investments in tourism-related industries.
- A submission noted that national park status protects against "environmentally degrading activities such as mining and clearing the land for further agriculture".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions expressed concern about "major inconsistencies and contradictions" in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.
- A submitter queried the lack of terms of reference for the Mana Whenua Panel and "its method of decision-making", raising concern "that commercial concerns could take precedence over protecting the natural values".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".
- A submission sought for public conservation land to be restored and rehabilitated to maintain buffer zones and ecological diversity.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submission stated opposition to any reclassification unless it provides explicitly for access, including helicopter landings, sports fishing and gamebird hunting, or stated opposition as national park status "excludes hunting for

native species which are classified as gamebirds under the Wildlife Act, and which are managed as gamebirds (such as Pūkeko and Paradise Shelduck)”.

- A submission expressed concern about loss of recreation opportunities and access (including dog walking) suggesting that other classifications, such as conservation park, may provide a better balance between recreational enjoyment and protection of natural values.
- A submission recommended recreation reserve where areas have high cultural or recreational value to the public.

I recommend that these comments are not accepted. The methods of appreciation and recreational enjoyment proposed (dog access, hunting of indigenous avifauna) are potentially incompatible with protecting and preserving the natural resources described in the CVR, and the points raised do not justify overturning the notified intention. Although under a national park classification “the public shall have freedom of entry and access” this is subject to restrictions “necessary for the preservation of the native plants and animals or for the welfare in general of the parks” (National Parks Act 1980, s. 4(2)).

### Ecology and Landscape (Allowed)

- A submitter noted that the area has “great altitudinal sequences and is part of the larger Paparoa range”, advocating for addition to the “adjacent Fletcher Creek Ecological Area and/or Te Wharau Wildlife Management Area/Saxton EA”.
- A submitter advocated for classification as ecological area, noting that the “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”.
- Submissions suggested that the ecological values of the land are not high enough to meet the standard for national park classification, characterising the area as “not so unique or scientifically important to meet the standard set by the National Parks Act”. It was suggested that recreation reserve or scenic reserve would ensure sufficient protection but are less restrictive.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. a fine representation of an altitudinal sequence in indigenous vegetation, with gradients in vegetation and fauna due to variations in not only altitude, but also aspect and geology) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Several submissions opposed the proposed national park investigation whilst supporting the proposal to retain the area in stewardship, pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective. This follows a Ngāi Tahu tribal position that a national park classification “obstructs Ngāi Tahu from maintaining ancestral relationships with the whenua, obstructs kaitiaki rights and responsibilities, limits the meaningful involvement of Ngāi Tahu in decision-making processes, and is less enabling of customary practices that are fundamental to sustaining tribal identity and mana”.

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

### General (Allowed)

- Submissions stated general opposition to national park classification, support for leaving the land in stewardship, or expressed support for the recommendations made by the Mana Whenua Panel, without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## Permissions, Economic Factors and Land Use (Not Allowed)

A submitter expressed concern that “change in status or disposal will affect the existing permissions”. They noted that there are various concessions in place (e.g. “concession licence for telecommunication facilities at Mt Raoulia, Concession easement for several telecommunications sites. Funding for the sites was provided by grants from Crown Infrastructure Partners to build the new sites and provide internet in rural areas”).

Submissions expressed opposition to the proposed national park classification as being “too restrictive” (e.g. “tying even more land up in restrictive legislation”) and not in the best interests of the public as it would “have negative impact on the potential economic benefit derived from mineral resource extraction”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submitter opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.
- A submission expressed the view that national park classification does not equate to effective protection from introduced pests or predators.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Retain in Stewardship - INA\_23\_2806938v

*The comments received in relation to the Mana Whenua Panel recommendation are summarised below and have been considered in relation to the notified proposal when forming s.49 allow/accept recommendations.*

## Support

### Ecology and Landscape (Allowed)

- A submission suggested that there was insufficient evidence of the conservation value and characteristics to justify a national park classification.

I recommend that these comments are not accepted. The natural resources described in the CVR (e.g. a fine representation of an altitudinal sequence in indigenous vegetation, with gradients in vegetation and fauna due to variations in not only altitude, but also aspect and geology) justify referring this area to the NZCA for its recommendation as to the suitability of a national park addition. This is further supported by the contiguous nature of the adjoining national park.

### Treaty Considerations (Allowed)

- Submissions supported retaining land in stewardship on the basis that the Mana Whenua Panel recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu’s claim and connection to their ancestral lands (e.g. “by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi”, “National Parks have stringent preservation and protection which obstruct Ngāi Tahu from maintaining ancestral relationships with the whenua”).
- A submission suggested that the area “must remain as stewardship land pending conservation law reform to create more appropriate forms of protected area classifications from a Ngāi Tahu perspective”.

Potential changes to management or legislative frameworks are not the subject of the notified proposal. As such, I recommend that comments advocating for such amendments are not accepted. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

## General (Allowed)

- Submissions stated support for the proposed classification or agreement with the Mana Whenua Panel without providing further details or agreed they reflected the "information in the technical reports".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed concern that "change in status or disposal will affect the existing permissions". They noted that there are various concessions in place (e.g. "concession licence for telecommunication facilities at Mt Raoulia, Concession easement for several telecommunications sites. Funding for the sites was provided by grants from Crown Infrastructure Partners to build the new sites and provide internet in rural areas").
- A submitter stated that reclassifying land as national park, or other classifications which fall under Schedule 4, could have economic consequences by excluding mineral extraction and other activities on that land. The potential loss of opportunities resulting from these restrictions was seen as damaging, particularly in terms of mineral extraction and site rehabilitation.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these classifications provide "more than adequate legal protection".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- A submission suggested that a holistic view, considering mineral prospectivity and other economic, social, and cultural considerations, should be taken when reclassifying stewardship land.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submissions advocated for national park reclassification as the land has high conservation values which are equivalent or similar to the adjacent national parks (e.g. classification should be "based upon ecological and scenic values that are similar to adjoining national parks", "Vegetation patterns and diversity in these areas would similarly add to the continuity and representativeness of the national park", and the "nationally significant ecological systems and natural areas" present).
- One submission highlighted that the land has "high conservation values, equivalent to those in the area included in the park when it was formed 45 years ago. They include more of the complex geology and landforms of the Paparoa Range and its adjoining lowlands than is currently in the park".

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present which warrant consideration. My view is that the natural resources identified in these comments are consistent with those described in the CVR (e.g. a fine representation of an altitudinal sequence in indigenous vegetation, with gradients in vegetation and fauna due to variations in not only altitude, but also aspect and geology), and they are appropriately protected and preserved by the proposed classification. The contiguous nature of the adjoining national park further supports your notified intention to refer this area to the NZCA for its recommendation as to the suitability of a national park addition.

- One submission recommended reclassification as a conservation park, or suggested a scenic reserve or recreation reserve to ensure sufficient protection in areas where there is potential risk of damaging activities such as mining.

I recommend that these comments are not accepted. My assessment is that the natural resources warrant referring this area to the NZCA for its recommendation as to the suitability of a national park addition. The points raised do not justify overturning the notified intention.

## Treaty Considerations (Allowed)

- A submitter opposed “Mana Whenua’s blanket opposition to adding areas of stewardship land to National Parks”, suggesting that “Mana Whenua must be assured free access and use of National Parks for cultural, traditional, historical and customary purposes within the framework of the purpose for which the National Park is formed, as set out in s4 of the National Parks Act 1980”.
- A submitter suggested that the proposal to retain the area in stewardship “goes beyond the obligation to give effect to the Treaty of Waitangi”, advocating that “an area with high conservation values should be reclassified to reflect that value”.

I recommend that these comments are accepted to the extent that they agree the natural and historic resources present warrant referral to the NZCA for their consideration. However, while the possibility of future changes to management or legislative frameworks is identified by submitters as a potential means of reconciling that purpose with Treaty partner interests, such changes are not being considered within this reclassification exercise. The notified proposal includes referral of the area to the NZCA for its consideration on the suitability of a national park classification, which provides a further opportunity to explore specific Ngāi Tahu interests and aspirations, including the NZCA’s consideration as to what giving effect to Treaty principles may require.

## General (Allowed)

- Submissions stated general opposition to the classification without providing further justification, expressed preference for reclassification as a national park due to factors such as the “high protection” provided, or suggested reclassification as either scenic reserve or conservation park is preferable to retaining the land in stewardship (e.g. “add to National Park or Paparoa Wilderness area”).
- A submission sought the “highest possible classification” due to the land’s “high cultural conservation value”.
- A submission opposed retaining land in stewardship, describing it as a “meaningless recommendation”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submission noted that national parks support a nature economy, and that this is in line with the Te Whanaketanga Tai Poutini West Coast Economic Strategy 2050.
- A submitter advocated for a national park classification to prevent the “creation of mines that will devastate the local areas”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- Submissions expressed concern about “major inconsistencies and contradictions” in the reclassification process, noting that some high value conservation land has not been recommended for reclassification as national park.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- A submission queried the extent of land in South Westland not included in the reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a



hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_24 – Stony Creek – 2806883

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Stony Creek	INA_24_2806883o	Scenic Reserve (a)	Neutral	11	4

### DOC Conservation Values Report Description

A 15.2721-ha remnant podocarp/beech forest on the edge of Stony Creek on the Maimai Plains, it is adjacent to Mawheraiti Scenic Reserve to the west and farmland to the north and east. Stony Creek itself is a Species Management Unit for dwarf galaxias. A power line easement is in place.

### Panel Recommendations

National Panel: Scenic reserve (a), to increase the extent of indigenous forest and habitats for other species and to improve continuity of landscape with the Mawheraiti Scenic Reserve to the west.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. remnant podocarp/beech forest).

## Scenic Reserve (a) - INA\_24\_2806883o

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Not Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that “change in status or disposal will affect the existing permissions”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Oppose

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## INA\_25 – Murphy Creek – 2806884

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Murphy Creek	INA_25_2806884p	Conservation Park	Neutral	12	10

### DOC Conservation Values Report Description

A 60.5338-ha block of indigenous forest on either side of the Murphy Creek, surrounded on three sides by the Victoria Forest Park. It provides additional habitat for species and an increase in protected forested land. There is no road or track access, and it is little used by visitors.

### Panel Recommendations

National Panel: Conservation park, to ensure long-term protection of the area's high level of representativeness and naturalness, the habitat it provides for species of the wider Victoria Forest Park, and the protection it provides for the catchment area of Murray Creek.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: My conclusion is that the natural resources present (e.g. indigenous forest with high levels of predicted naturalness) are appropriately protected under the proposed classification. The area is surrounded on three sides by the Victoria Forest Park. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_25\_2806884p

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".

- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values present and described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, wildlife management area, ecological area or scenic, nature, scientific, or recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).
- A submission noted the “land parcel is an enclave within land that has a higher protected status than that proposed”.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (indigenous forest with high levels of naturalness and representativeness) and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_26 – Mawheraiti Farm – 2806814

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Mawheraiti Farm	INA_26_2806814q	Scenic Reserve (a)	Neutral	10	5

### DOC Conservation Values Report Description

A 189.1379-ha beech/podocarp forest on outwash with shrubland wetland species, next to an area of Paparoa National Park and Mirfin Scenic Reserve, accessible from Somerville Road and Mawheraiti. Good coverage of podocarp/beech forest, which is now rare on the Maimai Plains. It is part of an important wildlife corridor.

### Panel Recommendations

National Panel: Scenic reserve (a), to provide continuity of landscape with the adjoining Mawheraiti Scenic Reserve, and a buffer between developed farmland the adjacent national park.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change and will protect the ecological values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. beech/podocarp forest).

## Scenic Reserve (a) - INA\_26\_2806814q

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### Ecology and Landscape (Allowed)

- A submitter who supported the proposed classification noted that “these areas contain high ecological values very similar to the existing National Parks, in places including ecosystems untouched by humans.

I recommend that this comment is accepted. I agree that the area contains high ecological values, and that the proposed classification will appropriately promote the protection and preservation of the identified natural resources. The CVR notes

the area to contain good coverage of podocarp/beech forest. Under a scenic reserve classification “indigenous flora and fauna, ecological associations, and natural environment and beauty shall as far as possible be preserved” ().

### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters advocated for classification as national park, noting that the area “has ecological values that appear similar to those on other nearby land with a higher protected status” and links existing areas of national park.

I recommend that these comments are not accepted. I consider that the values present are appropriately protected and preserved by the proposed classification, and the points raised do not justify overturning the notified intention. Under a scenic reserve classification “indigenous flora and fauna, ecological associations, and natural environment and beauty shall as far as possible be preserved” (Reserves Act 1977, s. 19(2)(a)). As identified in the CVR, the area contains good coverage of podocarp/beech forest and plays an important role as wildlife corridor, however the waterways present are only partially included and flow through developed farmland. Together with the Otututu/Rough River, Mirfin Scenic Reserve and the Otututu Ecological Area the area will provide continuous indigenous cover and provide a buffer to the adjoining outlier area of Paparoa National Park.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a

hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## INA\_27 – Blackwater River – 2806815

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Blackwater River	INA_27_2806815r	Conservation Park	Neutral	13	12

### DOC Conservation Values Report Description

A 26.465-ha area of highly modified ecosystem from mining activity, including gravel uplift and indigenous vegetation removal. There are no at-risk or threatened terrestrial species recorded. There is a small section of indigenous forest on hillside, adjacent to Victoria Forest Park. There are old dredge tailing mounds from gold dredging operations in the late 19th and early 20th centuries and an active mining permit on part of this area.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjacent Victoria Forest Park to preserve and protect the identified historical and ecological values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_27\_2806815r

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.

- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. "better protection added to adjoining Ecological area for regeneration", "ecological area, as the area to the north it is contiguous").

I recommend that these comments are not accepted. My assessment is that the natural resources present (e.g. highly modified ecosystem, small section of modified indigenous forest) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and "it appears to be an inefficient way of managing land for conservation". It was recommended to combine the proposed parks where the values are similar as this "provides greater opportunity for large landscape scale management".

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that "Conservation Parks do not protect against the establishment of mines on conservation land".
- A submitter advocated for a review of what permissions are present to determine if the area has "a current economic value to our Community".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is "politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel".
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_28 – Caribu Creek – 2806818

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Caribu Creek	INA_28_2806818s	Disposal	Disposal	8	30

### DOC Conservation Values Report Description

A 1.3154-ha area of mostly gravel road with weedy verge side vegetation and only a very small section of the Caribu Creek in it. It is a small piece of modified land surrounded by forestry, adjacent to a finger of Victoria Forest Park. It has a history of recent gold mining.

### Panel Recommendations

National Panel: Disposal, as this area is a small piece of modified land with low representativeness and naturalness, and limited conservation or cultural value.

Mana Whenua Panel: Disposal, as the conservation area is modified and is considered to contain no or very low conservation values.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations.

The Mana Whenua Panel have signalled specific Ngāi Tahu interests associated with this stewardship area, particularly that “this conservation area is adjacent to Ngāi Tahu Forestry, an indication of Ngāi Tahu presence, interest and use of the land in this vicinity” and “Ngāi Tahu may have future aspirations for this land (such as forestry)”.

Given the Mana Whenua Panel support for the notified disposal investigation, I consider the classification is not inconsistent with the identified interests.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_28\_2806818s

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. I agree that the land, which is highly modified (mostly gravel road), holds low conservation values, supporting a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu’s connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I note that the Mana Whenua Panel has supported the notified intention, and I therefore consider the classification is not inconsistent with the identified Ngāi Tahu interests. The modified nature of this stewardship area (e.g. primarily gravel road) justifies referring this area to the Department to investigate the suitability of disposal.

- One submitter stated, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter opposed disposal for “patches of river edges that are valued for recreation”, commenting that “some are just good to look at or to enjoy a roadside picnic”.
- Submitters wanted to ensure public access was retained. One noted the gravel road and described the area as providing “a link in public access to the Victoria Forest Park, which surrounds this area”. Local purpose reserve was recommended, with the purpose suggested to be either river conservation, river access, or recreation access.
- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. As the stewardship area consists primarily of gravel road, it is unlikely to hold recreation values which warrant retention as public conservation land. Though close to Victoria Forest Park, the stewardship area is not immediately adjacent to it. I note that as part of the disposal process the land may be identified as required for public works, including the existing road access.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature (primarily gravel road) and location (part of the Caribou Road, situated within land used for forestry) limit the appropriateness and effectiveness of retaining it for restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Ecology and Landscape (Allowed)

- A submitter stated there is “retention of good opportunities for restoration of depleted indigenous ecosystems; is inappropriate because the land is unusable (as ocean or river) and should remain in Crown ownership”, recommending reclassification as a conservation park.
- other submitters also recommended conservation park, noting the area “contains some regrowth vegetation and is separated from Victoria Forest Park by a very narrow strip containing the Caribou Road”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The small size of the area, its modified nature (primarily gravel road) and location (part of the Caribou Road, situated within land used for forestry) limit the appropriateness and effectiveness of retaining it for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter commented that the assessment is unclear as it states there is historic mining and forest access at this site, but there are no permissions recorded in the summary. They stated that this “needs review particularly if has a current economic value to our community”.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.



As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless conditions such as setbacks, fencing and planting were put in place.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature (primarily gravel road) and location (part of the Caribou Road, situated within land used for forestry) limit the appropriateness and effectiveness of retaining it for restoration and justify referring this area to the Department to investigate the suitability of disposal. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_29 – Blackwater Creek – 2806817

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Blackwater Creek	INA_29_2806817t	Local Purpose (River Conservation) Reserve	Neutral	7	12

### DOC Conservation Values Report Description

A 0.1812-ha area made up of three very small parcels of land in the riverbed of Blackwater Creek, downstream/north of a section of Victoria Forest Park. The surrounding landscape has been modified by farming and mining, including farmland to the edge of the river.

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve, to protect the identified values of these small areas that include parts of Blackwater Creek, as well as the main stem and gravel beach.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation).

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_29\_2806817t

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification, noting that “all river margins should be retained for flood mitigation or adaption”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

#### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.



- One submission expressed concern about the precedent potentially set by the Panels' recommendations and suggested that "more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems" were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submitter advocated for disposal, noting that "we have cared and maintained weed control on these very small parcels of land would like to purchase them incorporating them into our one area of farmland".
- Submissions opposed local purpose reserve classifications as "they can have their status changed without notification".

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and "provision for public access".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work

## INA\_30 – Blackwater Creek – 2806816

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Blackwater Creek	INA_30_2806816u	Disposal	Disposal	11	28

### DOC Conservation Values Report Description

A 0.2692-ha rectangular piece of land within the Blackwater settlement. It has a garage or shed, gravel park and gardens, and is almost wholly exotic and modified. Looks to have been farmed, but there is no grazing permit.

### Panel Recommendations

National Panel: Disposal, as this small conservation area consists of a highly modified valley ecosystem, with mostly farmland pine plantation on the hillsides. There are no indigenous values present and limited conservation or cultural value.

Mana Whenua Panel: Disposal, as the conservation area is modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the area is modified.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_30\_2806816u

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.
- A submitter suggested that there should be an onsite assessment to ensure any associated conservation values are protected or buffered.

I recommend that these comments are accepted. The land is highly modified (almost wholly exotic or modified, and has a building) and holds low conservation values, supporting a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of this stewardship area (e.g. almost wholly exotic or modified, has a building) justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

- A submitter suggested, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- A couple of submissions suggested that the landowner surrounding the block should be given first offer on the land.
- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. My assessment is that the area, which is highly modified, within the Blackwater settlement, and not linked to other public conservation land, does not hold recreational values which justify retention as public conservation land.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend that these comments are not accepted. The very small size of the area, its highly modified nature, and its landscape context (within the Blackwater settlement and not linked to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration and justify referring this area to the Department to investigate the suitability of disposal. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Ecology and Landscape (Allowed)

- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex,



etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.

- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The very small size of the area, its highly modified nature, and its landscape context (within the Blackwater settlement and not linked to other public conservation land) limit the appropriateness and effectiveness of retaining it for restoration and justify referring this area to the Department to investigate the suitability of disposal. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submitters commented that this “small (0.2692 ha) block of PCL has been almost entirely encroached on by the neighbouring landowner and contains pasture and buildings. It seems inconceivable that landowners who appropriate their neighbour’s land should be rewarded with the opportunity to purchase the land they have occupied”.
- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The very small size of the area, its highly modified nature, and its landscape context (within the Blackwater settlement and not linked to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration and justify referring this area to the Department to investigate the suitability of disposal. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_31 – Waiuta – 2807510

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Waiuta	INA_31_2807510v	Conservation Park	Neutral	13	9

### DOC Conservation Values Report Description

A 0.0998-ha area important for the mining activities and daily life that were captured in a series of extraordinary photographs by resident miner-photographer, Joseph (Jos) Divis. This is his cottage, due to be restored, within the historic Waiuta township and surrounded by Waiuta Amenity Area. The surrounding area is in indigenous and exotic shrubland, with several disused mine sites close by. No waterways are present, or at-risk or threatened species. Waiuta has ongoing social importance. By the late 1970s and early 1980s, interested individuals were recording information, including numerous oral and social histories, and it became a place of early 'heritage recreation' and conservation efforts by the New Zealand Forest Service. It is now a popular visitor site.

### Panel Recommendations

National Panel: Conservation park as an addition to the surrounding Victoria Forest Park will protect its historic resources and facilitate public recreation and enjoyment, as well as providing continuity of landscape.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: My conclusion is that the natural and historic resources present are appropriately protected under the proposed classification (e.g. historic mining cottage, low level of naturalness). The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_31\_2807510v

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.



## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. This small stewardship area contains a historic cottage and limited ecological values. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_32 – Little Grey River – 2806819

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Little Grey River (Riverbed)	INA_32_2806819n	Local Purpose (River Conservation) Reserve	Neutral	10	12
Little Grey River (Pasture)	INA_32_2806819o	Disposal	Disposal	8	30

### DOC Conservation Values Report Description

A 5.5268-ha isolated area of the Mawheraiti (Little Grey) River bed and terraces, cleared of indigenous vegetation and surrounded by farmland. This area is partially developed and is not diverse in terms of freshwater systems, as it is only one river.

### Little Grey River (Riverbed)

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve is considered to reflect the identified values of the Little Grey River bed.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the 'riverbed' section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_32\_2806819n

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve, noting that the area "provides or protects actual or potential public access as the river move" and that the area is of "angler interest".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.



### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the "information in the technical reports".
- A submission supported the highest possible classification for the land as it has "high cultural conservation value".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area "will be subject to flooding from climate change effects" and should be classified to promote re-vegetation and "become part of our emission reduction programme".
- A submitter suggested that "all river margins should be retained for flood mitigation or adaption".
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the "important conservation outcomes that could be achieved in the future".
- A submitter advocated for government purpose (river floodplain) reserve to provide "opportunities for ecosystem restoration in response to flood events or coastal erosion" and "opportunities for carbon sequestration".

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

#### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification "provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development", citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- A submission opposed the classification as it does not address management at "an ecosystem or catchment level" and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration "to the very high and nationally important natural conservation values of the rivers".
- A submitter noted that although modified, "the riparian values need protection from grazing", and that "some of the southern parcel is riverbed and should not be privatised".

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it "gives no greater protection than the current Stewardship status".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels' recommendations and suggested that "more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems" were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as "they can have their status changed without notification".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and "provision for public access".
- A submission wanted to ensure that access to rivers is maintained or improved, and that river access by helicopter continues to be possible.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

### Ecology and Landscape (Allowed)

- A submission emphasised that river should be "maintained in a free-flowing unmodified state, and in particular that the conservation classification does not allow for dams and flow diversions".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Other (Not Allowed)

- A submission wanted to ensure that the DOC concession system continues to be "the only system used for permissions".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Little Grey River (Pasture)

### Panel Recommendations

National Panel: Disposal should be considered for this stable area of developed pasture.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the area is highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## **Disposal - INA\_32\_2806819o**

### Support

#### Access and Recreation (Allowed)

- A submitter who supported disposal wanted to ensure public access to the river is guaranteed.

I recommend these comments are accepted. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor.

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The components of the stewardship area recommended for disposal consist primarily of modified pasture and hold low conservation values, supporting a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of the pastoral components of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.



I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

#### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access, particularly to rivers, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”. It was noted that access via marginal strips is not guaranteed.
- Reclassification as a local purpose reserve was recommended, with purposes variously suggested as river conservation, river access, or recreation access.
- There was noted to be angler interest, and one submitter elaborated that “these blocks are riparian strips along the Maimai River, which used to be a prized recreational fishing river prior to the catchment being converted to dairy farming, and if the right processes are put in place, it will once again be a valued fishing and recreational area”. They advocated for the area to be retained.

I recommend that these comments are not accepted. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor and allow angling to continue.

#### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options, for example, opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes (e.g. “There is potential use as riparian margin protection against flooding, erosion and river shift”, “all river margins should be retained for flood mitigation or adaption”, “opportunities for ecosystem restoration in response to flood events or coastal erosion”).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead. Another submitter suggested “GPR (river floodplain)”.
- It was noted that disposal would not “assist with a reduction in emissions from agriculture”.

I recommend that these comments are not accepted. The small size of the pastoral components of the stewardship area recommended for disposal, its highly modified nature, and its landscape context (surrounded by farmland, not linked to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Ecology and Landscape (Allowed)

- Submitters recommended “Local Purpose (River Conservation for ecological reasons) Reserve”, stating that “there are no grazing concessions but much of the blocks, which border the Little Grey River, have been converted to pasture (..) The block has value providing carbon capture through regrowth of indigenous forest and should not be disposed of”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submitter noted the area to “have potential for reversion to natural vegetation and carbon capture once cattle are removed”.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The small size of the pastoral components of the stewardship area recommended for disposal (less than 5.52 ha), its highly modified nature, and its landscape context (surrounded by farmland, not linked to other public conservation land) limit the appropriateness and effectiveness of retaining it for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

## General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.

- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- A submission wanted to ensure that access to rivers is maintained or improved, and that river access by helicopter continues to be possible.

I recommend that these comments are not accepted. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor and allow angling to continue.

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The small size of the pastoral components of the stewardship area recommended for disposal, its highly modified nature, and its landscape context (surrounded by farmland, not linked to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_33 – Blacks Point - Trennery Street – 2807907

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Blacks Point - Trennery Street	INA_33_2807907w	Disposal	Disposal	9	26

### DOC Conservation Values Report Description

A 0.0286-ha residential area within Blacks Point settlement of largely exotic trees and grassland, with no freshwater conservation values present. Blacks Point settlement is a small mining settlement dating from the early 1870s.

### Panel Recommendations

National Panel: Disposal. This area is covered with exotic trees and grasses within Blacks Point settlement. The section may contain archaeological material associated with a small building from a late nineteenth century survey plan and the Andersons Water Race, but these potential heritage values are not considered sufficient to warrant ongoing management of these areas by the Department.

Mana Whenua Panel: Disposal, as the conservation areas are modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the areas are modified.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_33\_2807907w

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.
- A submitter recommended that onsite assessment occurs to ensure any associated conservation values are protected or buffered.

I recommend that these comments are accepted. I agree that the low conservation values of the stewardship area (a small residential area in the Blacks Point settlement, largely exotic trees and grasses, with no freshwater conservation values present) justify referring this area to the Department to investigate the suitability of disposal. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of mana whenua, recognise Ngāi Tahu's connection to their ancestral lands, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I note that the Mana Whenua Panel has supported the proposed disposal investigation. I agree that the modified nature of the stewardship area justifies referring this area to the Department to investigate the suitability of disposal.

- A submitter suggested, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal or agreement with the recommendation without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.
- A submitter recommended that “where possible, land should be exchanged for areas of nearby land that support areas of unprotected indigenous vegetation”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter stated that the area provides “alternative access for the Murray Creek Track, both ends of the loop walk”, recommending reclassification as local purpose (recreation access) reserve.
- A submitter recommended “Local Purpose Reserve with appropriate purpose, including River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”.
- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. Access to the Murray Creek Track is south of this area, via Trennery Street Blacks Point Historic Reserve, so it is my assessment that this stewardship area is not necessary to maintain access to the track. As this area is very small, within the residential Black’s Point settlement, and has no DOC-managed tracks or facilities, it is unlikely to hold recreation or access values that warrant retention as public conservation land.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend that these comments are not accepted. The very small size of the area and its modified nature (largely exotic trees and grassland) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. The CVR states there are no freshwater conservation values, and the stewardship area is separated from the river by SH7, so it is my assessment that it is unlikely to contribute to flood/erosion buffering.

### Ecology and Landscape (Allowed)

- A submitter stated, “add to Victoria Forest Park, or Road Reserve. It is wrong to privatise land adjacent to waterways”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are not accepted. The small size of the area (0.02 ha), its modified nature (largely exotic trees and grassland), and its location in the Blacks Point residential settlement, limit the appropriateness and effectiveness of retaining it for ecosystem restoration. While it shares a border with Victoria Forest Park, in my assessment the small size of the area means it would not materially enhance the integrity of the Park. The CVR states there are no freshwater conservation values, and the stewardship area is separated from the river by SH7, so the stewardship area does not contribute to the protection of any waterways.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.



- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The small size of the area and its modified nature (largely exotic trees and grassland) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. The CVR states there are no freshwater conservation values, and the stewardship area is separated from the river by SH7, so it is unlikely to contribute to flood/erosion buffering.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_33 – Blacks Point - Trennery Street – 2807908

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Blacks Point - Trennery Street	INA_33_2807908x	Disposal	Disposal	9	27

### DOC Conservation Values Report Description

A 0.061-ha residential area within Blacks Point settlement of largely exotic trees and grassland, with no freshwater conservation values present. Blacks Point settlement is a small mining settlement dating from the early 1870s.

### Panel Recommendations

National Panel: Disposal. This area is covered with exotic trees and grasses within Blacks Point settlement.

Mana Whenua Panel: Disposal, as the conservation areas are modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the areas are modified.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_33\_2807908x

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.
- One submitter recommended that onsite assessment occurs to ensure any associated conservation values are protected or buffered.

I recommend that these comments are accepted. I agree that the low conservation values of the stewardship area (a small residential area in the Blacks Point settlement, largely exotic trees and grasses, with no freshwater conservation values present) justify referring this area to the Department to investigate the suitability of disposal. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of this stewardship area (e.g. largely exotic trees and grassland) justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

- A submitter suggested, “gift it to the local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.
- A submitter recommended that “where possible, land should be exchanged for areas of nearby land that support areas of unprotected indigenous vegetation”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter stated that the area provides “alternative access for the Murray Creek Track, both ends of the loop walk”, recommending reclassification as local purpose (recreation access) reserve.
- A submitter recommended “Local Purpose Reserve with appropriate purpose, including River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”.
- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. Access to the Murray Creek Track is south of this area, via Trennery Street Blacks Point Historic Reserve, so it is my assessment that this stewardship area is not necessary to maintain access to the track. As this area is very small, within the residential Black’s Point settlement, and has no DOC-managed tracks or facilities, it is unlikely to hold recreation or access values that warrant retention as public conservation land.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend that these comments are not accepted. The very small size of the area and its modified nature (largely exotic trees and grassland) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. The CVR states there are no freshwater conservation values, and the stewardship area is separated from the river by SH7. It is my assessment that it is unlikely to contribute to flood/erosion buffering.



## Ecology and Landscape (Allowed)

- A submitter stated, “add to Victoria Forest Park, or Road Reserve. It is wrong to privatise land adjacent to waterways”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are not accepted. The very small size of the area, its modified nature (largely exotic trees and grassland), and its location in the Blacks Point residential settlement limit the appropriateness and effectiveness of retaining it for ecosystem restoration. While it shares a border with Victoria Forest Park, in my assessment the small size of the area means it would not materially enhance the integrity of the Park. The CVR states there are no freshwater conservation values, and the stewardship area is separated from the river by SH7. It is my assessment that the stewardship area does not contribute to the protection of any waterways.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

## General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for

future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.

- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The very small size of the area and its modified nature (largely exotic trees and grassland) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. The CVR states there are no freshwater conservation values, and the stewardship area is separated from the river by SH7, so it is my assessment that it is unlikely to contribute to flood/erosion buffering.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to the Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_34 – Crushington / Blacks Point – 2807905

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Crushington / Blacks Point	INA_34_2807905y	Disposal	Disposal	7	29

### DOC Conservation Values Report Description

A 0.7534-ha area of river terrace on the true right bank of Inangahua River, between the river and state highway, close to Victoria Forest Park. The area is highly modified and mostly consists of exotic vegetation. There is historical interest from mining and because this is the birthplace of Olympian, Jack Lovelock.

### Panel Recommendations

National Panel: Disposal, as the area is isolated, highly modified, and mostly consists of exotic vegetation.

Mana Whenua Panel: Disposal, as the conservation areas are modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the areas are modified.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_34\_2807905y

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. I agree that the low conservation values of the area (highly modified, mostly consists of exotic vegetation) justifies referring the area to the Department for a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.



## General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter recommended “reclassification as Local Purpose Reserve with appropriate purpose, including River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”. Another stated, “add to Victoria Forest Park, or Road Reserve. It is wrong to privatise land adjacent to waterways”.
- Submissions objected to disposal on the grounds that this represents a loss of public access, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor. It is my assessment that there are unlikely to be recreation or access values in this area, which is modified and isolated, that warrant retention as public conservation land.

### Climate Change and Natural Hazards (Allowed)

- Submitters opposed disposal on the grounds that there is “potential use as riparian margin protection against flooding, erosion and river shift”, and suggested that “the blocks have value providing carbon capture through regrowth of indigenous forest. They recommended “Local Purpose (River Conservation for ecological reasons) Reserve”.
- Another submitter recommended GPR (river floodplain), noting that there are “opportunities for ecosystem restoration in response to flood events or coastal erosion”.
- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature, and its landscape context (situated between the road and the river, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Ecology and Landscape (Allowed)

- A submitter noted that there is “retention of good opportunities for restoration of depleted indigenous ecosystems” and recommended GPR (river floodplain).
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature, and its landscape context (situated between the road and the river, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for restoration and justify referring this area to the Department to investigate the suitability of disposal. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

- A submitter stated, “transfer ownership to local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

## General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter opposed disposal based on concern that disposal would affect existing permissions, noting the area is part of a grazing concession for five grazing areas in the Reefton district.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing, planting and setbacks were put in place.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature, and its landscape context (situated between the road and the river, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_34 – Crushington – 2807906

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Crushington	INA_34_2807906a	Disposal	Disposal	7	29

### DOC Conservation Values Report Description

A 0.918-ha area of river terrace on the true right bank of Inangahua River, between the river and state highway, close to Victoria Forest Park. The area is highly modified and mostly consists of exotic vegetation. It is being grazed – concessions are in place. There is historical interest from mining and because this is the birthplace of Olympian, Jack Lovelock.

### Panel Recommendations

National Panel: Disposal, as the area is isolated, highly modified and mostly consists of exotic vegetation.

Mana Whenua Panel: Disposal., as the conservation areas are modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the areas are modified.

Rationale: My assessment is that the stewardship area is of low conservation value, and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_34\_2807906a

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. I agree that the low conservation values of the area (which is highly modified and mostly consists of exotic vegetation) justifies referring the area to the Department for a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

## General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter recommended “reclassification as Local Purpose Reserve with appropriate purpose, including River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”. Another stated, “add to Victoria Forest Park, or Road Reserve. It is wrong to privatise land adjacent to waterways”.
- Submissions objected to disposal on the grounds that this represents a loss of public access and ability for future generations to enjoy these areas, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. Any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies which will secure ongoing public access along the riparian corridor. It is my assessment that there are unlikely to be recreation or access values in this area, which is currently grazed, that warrant retention as public conservation land.

### Climate Change and Natural Hazards (Allowed)

- Submitters opposed disposal on the grounds that there is “potential use as riparian margin protection against flooding, erosion and river shift”, and suggested that “the blocks have value providing carbon capture through regrowth of indigenous forest. They recommended “Local Purpose (River Conservation for ecological reasons) Reserve”.
- Another submitter recommended GPR (river floodplain), noting that there are “opportunities for ecosystem restoration in response to flood events or coastal erosion”.
- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature, and its landscape context (situated between the road and the river, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Ecology and Landscape (Allowed)

- A submitter noted that there is “retention of good opportunities for restoration of depleted indigenous ecosystems” and recommended GPR (river floodplain).
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend that these comments are not accepted. The small size of the area, its highly modified nature, and its landscape context (situated between the road and the river, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

- A submitter stated, “transfer ownership to local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998.

## General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter opposed disposal based on concern that disposal would affect existing permissions, noting the area is part of a grazing concession for five grazing areas in the Reefton district.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.
- A submitter stated “The National Panel is recommending 65 hectares for disposal, but has recommended up to an additional 1000 hectares of land may be disposed of where there is pastoral land alongside river conservation areas (subject to survey). This is not explained or justified”.
- A submitter advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- Disposals were opposed unless conditions such as fencing, planting and setbacks were put in place.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend that these comments are not accepted. The small size of the area (0.91 ha), its highly modified nature, and its landscape context (situated between the road and the river, not connected to other public conservation land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_35 – Progress Water Race – 2807505

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Progress Water Race	INA_35_2807505b	Conservation Park	Conservation Park	17	9

### DOC Conservation Values Report Description

A 5.5238-ha sliver of land that was once a water race constructed to power goldmining operations at Globe Hill during the latter part of the 19th and into the early 20th century. Old growth forest has been logged or cleared in the past. There are no at-risk or threatened species recorded, but the area provides forested ecosystems for some species, most likely native birds and invertebrates. A short section of the race to the north of the area forms the DOC-managed Progress Water Race Walk.

### Panel Recommendations

National Panel: Conservation park, to maintain the historical integrity of the area, while also providing continuity of landscape with the adjacent Victoria Forest Park.

Mana Whenua Panel: Supports the recommendation of the Western South Island National Panel.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the classification, noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed classification, supported by submissions from Treaty partner organisations.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that natural (e.g. semi-intact indigenous forest) and historic resources present (e.g. a water race) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_35\_2807505b

### Support

#### Treaty Considerations (Allowed)

- Submissions stated they support the position of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of mana whenua and recognise Ngāi Tahu’s connection to their ancestral lands (e.g. “by adopting the recommendations of the Mana Whenua Panel the Minister will give effect to the principles of the Treaty of Waitangi”).

I recommend that these comments are accepted. My assessment is that natural (semi-intact indigenous forest) and the historic resources present (a water race) are appropriately protected under the proposed classification. I note that the Mana Whenua Panel has supported the proposed classification.

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.

- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My assessment is that natural (semi-intact indigenous forest) and the historic resources present (a water race) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification. A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_36 – Big River – 2807498

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Big River	INA_36_2807498c	Conservation Park	Neutral	12	9

### DOC Conservation Values Report Description

A 0.4215-ha rectangle of land next to a legal road and surrounded by Victoria Forest Park. Its historical values lie in its association with the successful quartz, coalmining and sawmilling operations that occurred at Big River, and the historic school site. There are no at-risk or threatened species recorded, and the area could be a habitat for lizards, invertebrates and native birds. This area is on the walking track between Big River Hut and Big River Engine House, visited by people exploring the history of Big River.

### Panel Recommendations

National Panel: Conservation park as an addition to the surrounding Victoria Forest Park will protect its historic resources and facilitate public recreation and enjoyment, as well as providing continuity of landscape.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the historic and natural resources present (e.g. broken forest cover modified by mining; historical values associated with Big River Mine; within a Heritage New Zealand Category I listed place) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_36\_2807498c

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.

- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. a small area modified by mining, with broken forest cover) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the fact the area is surrounded by Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.



- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_37 – Inangahua River – 2807493

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River	INA_37_2807493d	Scenic Reserve (a)	Neutral	10	4

### DOC Conservation Values Report Description

A 6.4519-ha beech forest between the state highway and Inangahua River surrounded by Rahu Saddle Scenic Reserve. Large swathes of the riverbank downstream have been cleared for a variety of different uses, so the integrity of this upland section is important. Recreation is occasional hunting and fishing.

### Panel Recommendations

National Panel: Scenic reserve (a), to protect the identified values, and to provide a layer of protection and landscape continuity with Rahu Scenic Reserve.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. indigenous beech forest).

## Scenic Reserve (a) - INA\_37\_2807493d

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## INA\_38 – Bald Hill – 2807496

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Bald Hill	INA_38_2807496e	Conservation Park	Neutral	11	12

### DOC Conservation Values Report Description

An 88.2676-ha area of tussock grassland, rocky ridges, shrubland, and forest on top of Bald Hill, that is completely surrounded by Victoria Forest Park. There is a high level of diversity and pattern, with a range of ecosystems and plant communities present from indigenous forests in the gullies, to shrublands, subalpine communities, wetlands, and rocky ridgelines. There are no freshwater records as it is largely a hilltop with only very small headwater streams. With no tracks or facilities, it is visited only for occasional hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park to protect the identified values and support continuity of landscape across the area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. tussock grassland, rocky ridges and shrubland) are appropriately protected under the proposed classification. The area is surrounded by Victoria Forest Park. The addition of the area to the Victoria Forest Park will provide consistent protection for the natural values present and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_38\_2807496e

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “Add to Big River Ecological Area, better protection than Forest Park”, “land parcel is an enclave within land that has a higher protected status than that proposed”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. tussock grassland, rocky ridges, shrubland) and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the natural values present and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_39 – Inangahua River – 2807494

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River	INA_39_2807494f	Scenic Reserve (a)	Neutral	10	4

### DOC Conservation Values Report Description

A 1.0806-ha area of beech forest and road, 1 km north of Rahu Saddle, surrounded by Rahu Scenic Reserve. It has good forest cover of mountain/silver beech forest. The integrity of the upland sections of this catchment are important. Visitor activity is likely to be hunting.

### Panel Recommendations

National Panel: Scenic reserve (a), to protect the identified values, provide continuity of landscape with Rahu Scenic Reserve, and to protect the integrity of the upland section of this area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. mountain/silver beech forest).

## Scenic Reserve (a) - INA\_39\_2807494f

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_39 – Inangahua River – 2807495

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Inangahua River	INA_39_2807495g	Scenic Reserve (a)	Neutral	10	4

### DOC Conservation Values Report Description

A 1.1377-ha area of beech forest and road on Rahu Saddle and is surrounded by Rahu Scenic Reserve. It has good forest cover of mountain/silver beech forest. The integrity of the upland sections of this catchment is important. This area is at the start of the DOC-managed Klondyke Valley Track, but there are no other tracks or facilities here. Visitor activity is likely to be hunting.

### Panel Recommendations

National Panel: Scenic reserve (a), to protect the identified values, provide continuity of landscape with Rahu Scenic Reserve, and to protect the integrity of the upland section of this area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. mountain/silver beech forest).

## Scenic Reserve (a) - INA\_39\_2807495g

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.



I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_40 – Palmer Road – 2807470

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Palmer Road	INA_40_2807470h	Conservation Park	Neutral	12	10

### DOC Conservation Values Report Description

A 0.4047-ha rectangular piece of beech forest on the western side of Palmer Road that adjoins Victoria Forest Park. No at-risk or threatened terrestrial species are recorded, but there are known threatened long-tailed bat roosts and feeding habitat along Palmer Road. Any visitors are likely to be hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park, appropriately reflects the identified values and supports continuity of landscape across the area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (a small area of beech forest) are appropriately protected under the proposed classification. The area is surrounded on three sides by Victoria Forest Park. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_40\_2807470h

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.

- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”) advocating for classification as ecological area.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (a small area of beech forest) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.



- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_40 – Palmer Road – 2807471

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Palmer Road	INA_40_2807471i	Conservation Park	Neutral	12	10

### DOC Conservation Values Report Description

A 0.3823-ha rectangular piece of beech forest on the western side of Palmer Road that adjoins Victoria Forest Park. No at-risk or threatened terrestrial species are recorded, but there are known threatened long-tailed bat roosts and feeding habitat along Palmer Road. Any visitors are likely to be hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park, appropriately reflects the identified values and supports continuity of landscape across the area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (a small area of beech forest) are appropriately protected under the proposed classification. The area is surrounded on three sides by Victoria Forest Park. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_40\_2807471i

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.

- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”, advocating for classification as ecological area).
- A submission noted the “land parcel is an enclave within land that has a higher protected status than that proposed” recommending ecological area.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (a small area of beech forest) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_40 – Palmer Road – 2807472

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Palmer Road	INA_40_2807472j	Conservation Park	Neutral	13	10

### DOC Conservation Values Report Description

A 0.4044-ha rectangular piece of beech forest on the western side of Palmer Road that adjoins Victoria Forest Park. No at-risk or threatened terrestrial species are recorded, but there are known threatened long-tailed bat roosts and feeding habitat along Palmer Road. Any visitors are likely to be hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park, appropriately reflects the identified values and supports continuity of landscape across the area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (a small area of beech forest) are appropriately protected under the proposed classification. The area is surrounded on three sides by Victoria Forest Park. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_40\_2807472j

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.

- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).
- A submission noted the “land parcel is an enclave within land that has a higher protected status than that proposed” recommending ecological area.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (a small area of beech forest) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_41 – Palmer Road – 2807473

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Palmer Road	INA_41_2807473k	Conservation Park	Neutral	17	11

### DOC Conservation Values Report Description

A 185.0264-ha piece of beech forest along either side of Palmer Road. Its eastern side includes a portion of the Upper Grey River above its confluence with the Blue Grey River. There is a high level of diversity of pattern, from wetlands and riparian forests on the edge of the Upper Grey River, through to intact forests connecting with the Victoria Forest Park. There are several records of native freshwater fishery values within this area. Visitor activities typically include tramping, hunting and fishing. There is a grazing licence for dairy cows.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, maintains landscape integrity and continuity, and adds an additional layer of protection to the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as enabling access for the recreational values present and offering protection for the scenic and natural resources.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (a large area of beech forest with high levels of naturalness and small areas of modified exotic grassland) are appropriately protected under the proposed classification. The area has a contiguous boundary with Victoria Forest Park. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_41\_2807473k

### Support

#### Access and Recreation (Allowed)

- A submitter noted the area to be of high recreation value, containing “opportunities for untracked tramping experiences onto the tops either side of the valley” and “options for short walks and camping for families”.
- The area was noted to support access to “the Blue Grey/Mawhera River and to the upper Grey/Mawhera River”, describing these river sections as “very highly valued by packrafters”. The submitter referenced the Grey Water Conservation Order as directing that the waters of the Blue Grey River, “its tributaries, and Lake Cristabel shall be preserved as far as possible in their natural state”.

I recommend that these comments are accepted. The comments provide site-specific details regarding public access and recreational use which reflect those described in the CVR and add to my understanding of recreational visitors to the area (specifically packrafting activity). The Grey Water Conservation Order referred to is not inconsistent with the proposed

classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

### Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area’s high ecological and landscape value (e.g. “important for maintaining landscape continuity and connectivity”).

I recommend that these comments are accepted. My assessment is that the natural resources present (e.g. beech forest and wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- A submitter supported the proposed classification, while expressing preference for classification as Scenic Reserve, noting that the area encompasses “the scenic beech forest canopy drive down Palmers Road, one of the most enjoyable motoring-in-nature experiences in the Grey District”.

I recommend this comment is accepted to the extent that the submitter supports the proposed classification. Comments that the area deserves Scenic Reserve status are not accepted.

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).



- A submission noted the “land parcel is an enclave within land that has a higher protected status than that proposed”, recommending ecological area.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (beech forest and wetlands) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.
- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a

hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_41 – Upper Grey River – 2807474

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Upper Grey River	INA_41_2807474l	Conservation Park	Neutral	20	10

### DOC Conservation Values Report Description

An 80.4246-ha beech forest along either side of May Creek. There is a high level of diversity of pattern, from wetlands and riparian forests on the edge of the Upper Grey River, through to intact forests connecting with the Victoria Forest Park. There are several records of native freshwater fishery values within this area. Visitor activities typically include tramping, hunting and fishing. There is a grazing licence for dairy cows.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, maintains landscape integrity and continuity, and adds an additional layer of protection to the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as enabling access for the recreational values present and offering protection for the scenic values and natural resources.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. beech forest and wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_41\_2807474l

### Support

#### Access and Recreation (Allowed)

- The area was noted to support access to “the Blue Grey/Mawhera River and to the upper Grey/Mawhera River”, describing these river sections as “very highly valued by packrafters”. The submitter referenced the Grey Water Conservation Order as directing that the waters of the Blue Grey River, “its tributaries, and Lake Cristabel shall be preserved as far as possible in their natural state”.
- A submitter noted the area to be of high recreation value, containing “opportunities for untracked tramping experiences onto the tops either side of the valley” and “options for short walks and camping for families”.

I recommend that these comments are accepted. The comments provide site-specific details regarding public access and recreational use which reflect those described in the CVR and add to my understanding of recreational visitors to the area (specifically packrafting activity). The Grey Water Conservation Order referred to is not inconsistent with the proposed classification. The Conservation Park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).



## Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area's high ecological and landscape value (e.g. "important for maintaining landscape continuity and connectivity").

I recommend that these comments are accepted. My assessment is that the natural resources present (e.g. beech forest and wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (e.g. beech forest and wetlands) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and "it appears to be an inefficient way of managing land for conservation". It was recommended to combine the proposed parks where the values are similar as this "provides greater opportunity for large landscape scale management".

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_41 – Palmer Road – 2807475

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Palmer Road	INA_41_2807475m	Conservation Park	Neutral	20	10

### DOC Conservation Values Report Description

A 736.6244-ha beech forest along either side of Palmer Road. There is a high level of diversity of pattern, from wetlands and riparian forests on the edge of the Upper Grey River, through to intact forests connecting with the Victoria Forest Park. There are several records of native freshwater fishery values within this area. Visitor activities typically include tramping, hunting and fishing. DOC-managed Robinson Valley track starts in the south-western end of Palmer Road. There is a grazing licence for dairy cows.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, maintains landscape integrity and continuity, and adds an additional layer of protection to the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as enabling access for the recreational values present and offering protection for the scenic values and natural resources.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. beech forest and wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_41\_2807475m

### Support

#### Access and Recreation (Allowed)

- The area was noted to support access to “the Blue Grey/Mawhera River and to the upper Grey/Mawhera River”, describing these river sections as “very highly valued by packrafters”. The submitter referenced the Grey Water Conservation Order as directing that the waters of the Blue Grey River, “its tributaries, and Lake Cristabel shall be preserved as far as possible in their natural state”.
- A submitter noted the area to be of high recreation value, containing “opportunities for untracked tramping experiences onto the tops either side of the valley” and “options for short walks and camping for families”.

I recommend that these comments are accepted. The comments provide site-specific details regarding public access and recreational use which reflect those described in the CVR and add to my understanding of recreational visitors to the area (specifically packrafting activity). The Grey Water Conservation Order referred to is not inconsistent with the proposed classification. The Conservation Park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

## Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area's high ecological and landscape value (e.g. "important for maintaining landscape continuity and connectivity").
- A submitter supported the proposed classification, while expressing preference for classification as Scenic Reserve, noting that the area encompasses "the scenic beech forest canopy drive down Palmers Road, one of the most enjoyable motoring-in-nature experiences in the Grey District".

I recommend this comment is accepted to the extent that the submitter supports the proposed classification as protecting the values present. Submitters' comments that the area deserves scenic reserve status are not accepted. The comments provided do not justify overturning the notified intention.

## General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present (e.g. (beech forest and wetlands) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.



### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_41 – Palmers Road – 2807509

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Palmers Road	INA_41_2807509n	Conservation Park	Neutral	19	10

### DOC Conservation Values Report Description

An 8.4594-ha area on the eastern side of Palmer Road. It is partially forested and connects with the Victoria Forest Park on its eastern boundary. There are several records of native freshwater fishery values within this area. Visitor activities typically include tramping, hunting and fishing.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, maintains landscape integrity and continuity, and adds an additional layer of protection to the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as enabling access for the recreational values present and offering protection for the scenic values and natural resources.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. beech forest and freshwater values) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_41\_2807509n

### Support

#### Access and Recreation (Allowed)

- The area was noted to support access to “the Blue Grey/Mawhera River and to the upper Grey/Mawhera River”, describing these river sections as “very highly valued by packrafters”. The submitter referenced the Grey Water Conservation Order as directing that the waters of the Blue Grey River, “its tributaries, and Lake Cristabel shall be preserved as far as possible in their natural state”.
- A submitter noted the area to be of high recreation value, containing “opportunities for untracked tramping experiences onto the tops either side of the valley” and “options for short walks and camping for families”.

I recommend that these comments are accepted. The comments provide site-specific details regarding public access and recreational use which reflect those described in the CVR and add to my understanding of recreational visitors to the area (specifically packrafting activity). The Grey Water Conservation Order referred to is not inconsistent with the proposed classification. The Conservation Park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

## Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area's high ecological and landscape value (e.g. "important for maintaining landscape continuity and connectivity").

I recommend that these comments are accepted. My assessment is that the natural resources present (e.g. beech forest and freshwater values) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- A submitter supported the proposed classification, while expressing preference for classification as Scenic Reserve, noting that the area encompasses "the scenic beech forest canopy drive down Palmers Road, one of the most enjoyable motoring-in-nature experiences in the Grey District".

I recommend this comment is accepted to the extent that the submitter supports the proposed classification as protecting the values present. Submitters' comments that the area deserves scenic reserve status are not accepted. The comments provided do not justify overturning the notified intention.

## General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (beech forest and freshwater values) and the points raised do not warrant



overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_42 – Glengary Stream – 2807814

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Glengary Stream	INA_42_2807814o	Conservation Park	Neutral	13	9

### DOC Conservation Values Report Description

A 14.8252-ha regenerating forest and shrubland on the slopes and ridgelines with beech forest in two gullies, adjoining Victoria Forest Park to the north and private land to the west. Medium diversity and pattern, and evidence of forest clearance through fire which has led to fragmentation. The area is relatively isolated but may attract the occasional hunter.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, will improve landscape continuity across this area and provide a more logical landscape boundary.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit expressed general support for the notified classification.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. regenerating forest and shrubland) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_42\_2807814o

### Support

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.



- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and "it appears to be an inefficient way of managing land for conservation". It was recommended to combine the proposed parks where the values are similar as this "provides greater opportunity for large landscape scale management".

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that "Conservation Parks do not protect against the establishment of mines on conservation land".

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is "politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel".
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that "conservation values alone must determine recommended classifications, and recreation and use values are not conservation values".

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

##### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

##### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_43 – Shenandoah – 2807815

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Shenandoah	INA_43_2807815p	Conservation Park	Neutral	17	11

### DOC Conservation Values Report Description

A 456.1393-ha area of lowland montane beech forest on lower hillslopes that adjoins the Victoria Forest Park on its western side and the Shenandoah Scenic Reserve to the north. The area extends from the floor of Maruia Valley to the midslope of Victoria Range. There are no records of native freshwater fish here, but there are records of three mistletoe species (all At Risk - Declining) and other threatened species are also believed to be here. Occasional hunting and tramping take place. One grazing licence is in place. This area has played an important part in New Zealand's conservation history, being the inspiration for the Maruia Declaration, which demanded legal recognition of native forests and an end to their logging.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to reflect the identified ecological and recreational values and improve landscape continuity across this area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Exempting those expressing general support for the proposal, no submissions were accepted as holding substantial merit with regard to your notified proposal to classify the area as a conservation park.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. beech forest and localised wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_43\_2807815p

### Support

#### Access and Recreation (Allowed)

- Submitters noted recreation values which were not identified by the Panels; “high kayaking and rafting recreational values for a largely unmodified section of the Maruia River” (e.g. “The Maruia River where it runs behind Mt Rutland is a wilderness trip much valued by packrafters”, “a large section of the tramping track which leads to Wheel Creek Hut”).

I recommend that these comments are accepted. The comments provide site-specific details regarding public access and recreational use which reflect those described in the CVR and add to my understanding of recreational visitors to the area (specifically packrafting activity). The recreational activities referred to are allowed for under the proposed classification. The Conservation Park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).



## Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area's high ecological and landscape value (e.g. "important for maintaining landscape continuity and connectivity").

I recommend that these comments are accepted. My assessment is that the natural resources present (e.g. beech forest) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area "were central to the beech forest utilisation controversy of the 1970s and they are significant in our country's conservation history for the Maruia Declaration".

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural and historic resources present and recognises their significance as described in the CVR. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. "add to Ecological reserve. Better level of protection").

I recommend that these comments are not accepted. My conclusion is that the natural resources (e.g. beech forest and freshwater values) present are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_43 – Maruia River West Bank – 2807875

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Maruia River West Bank	INA_43_2807875q	Conservation Park	Neutral	19	12

### DOC Conservation Values Report Description

A 4415.7592-ha area of lowland montane beech forest on lower hillslopes. The area extends from the floor of Maruia Valley to the midslope of Victoria Range. There are no records of native freshwater fish here, but there are records of three mistletoe species (all At Risk - Declining) and other threatened species are also believed to be here. High use for rafting, kayaking, and fishing and occasional hunting and tramping. One grazing licence is in place. This area has played an important part in New Zealand's conservation history, being the inspiration for the Maruia Declaration, which demanded legal recognition of native forests and an end to their logging.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to reflect the identified ecological and recreational values and improve landscape continuity across this area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering sufficient protection for the natural and recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: My conclusion is that the natural resources present (e.g. beech forest and localised wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_43\_2807875q

### Support

#### Access and Recreation (Allowed)

- Submitters noted recreation values which were not identified by the Panels; "high kayaking and rafting recreational values for a largely unmodified section of the Maruia River" (e.g. "The Maruia River where it runs behind Mt Rutland is a wilderness trip much valued by packrafters", "a large section of the tramping track which leads to Wheel Creek Hut").

I recommend that these comments are accepted. They provide site-specific details regarding public access and recreational use which reflects those described in the CVR and adds to my understanding of recreational visitors to the area (specifically packrafting activity). The recreational activities referred to are allowed for under the proposed classification. The Conservation Park will be managed "to facilitate public recreation and enjoyment", subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

## Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area's high ecological and landscape value (e.g. "important for maintaining landscape continuity and connectivity"). It was noted that the area "should also have ecological area overlay for consistency with contiguous VFP on either side".

I recommend that these comments are accepted to the extent that they support the proposed classification. My assessment is that the natural resources present (e.g. beech forest) are appropriately protected through classification as a conservation park. The primary purpose of conservation parks includes to be managed so "so that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)). I note that the submitter has recommended the addition of an ecological overlay, however, any such addition is not within the scope of what was notified for this reclassification process.

## Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area "were central to the beech forest utilisation controversy of the 1970s and they are significant in our country's conservation history for the Maruia Declaration".

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural and historic resources present and recognises their significance as described in the CVR. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").

- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “Add to Ecological Reserve, better protection”, “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present (beech forest and wetlands) are appropriately protected under the proposed classification and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter noted a “grazing permit on Maruia River bed”, advocating for classification as “Ecological Reserve”.
- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.



I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_44 – Brunner Range Tops – 2807871

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Brunner Range Tops	INA_44_2807871r	Conservation Park	Neutral	17	11

### DOC Conservation Values Report Description

A 1629.2155-ha subalpine beech forest and relatively gentle tussock covered alpine tops stretching north to south along the full length of Brunner Range, entirely enclosed within the Victoria Forest Park. The rain and snowmelt-fed watercourses run into the headwaters of Inangahua and Buller rivers. The area contains alpine vegetation that is a localised and uncommon ecosystem, and the only known habitat of a large undescribed species of threatened *Powelliphanta* land snail – which is at risk due to the presence of feral pigs. There is a community-managed track and facility, but no DOC ones. Occasional tramping and hunting occur, including fly-ins.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to provide landscape continuity across the area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. beech forest and localised wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_44\_2807871r

### Support

#### Ecology and Landscape (Allowed)

- A submitter noted the scenic value of the area (e.g. “A wonderful alpine range affording beautiful wild views and intense feelings of serenity and freedom”).
- A submitter supported the proposed classification, advocating for a further ecological area overlay due to the presence of two alpine butterfly species (*Arygyrophenga* sp. and *Eriobiola butleri*).

I recommend that these comments are accepted to the extent that they support the proposed classification and provide site-specific details regarding the natural resources present. My view is that the natural resources identified are consistent with those described in the CVR, even if not specifically identified, and they are appropriately protected and preserved by the proposed classification. I note that the submitter has recommended the addition of an ecological overlay, however, any such addition is not within the scope of what was notified for this reclassification process.

## General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the "information in the technical reports".
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its "high cultural conservation value".

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed "trust that Conservation Park status will provide full protection from any future mining applications in these areas".
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide "more than adequate legal protection".
- A submission supported conservation park status and advocated for greater protection from "intrusive development" such as mining and hydro schemes, stating that "most of the Southern Alps deserves protection equivalent to that of National Park status".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification "needs to be followed up with sufficient funding for pest eradication".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters advocated for classification as ecological area due to "high biodiversity values", referencing the presence of the butterfly species Tussock ringlet (*Argyrophenga* sp.) and Butler's ringlet (*Erebiola butleri*) (e.g. "elusive, little known endemic insect of very restricted distribution in the South Island").
- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have "the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened").
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (subalpine beech forest and tussock) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundaries with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and "it appears to be an inefficient way of managing land for conservation". It was recommended to combine the proposed parks where the values are similar as this "provides greater opportunity for large landscape scale management".

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

## General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.



- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_45 – Shenandoah River – 2807876

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Shenandoah River (Pasture)	INA_45_2807876e	Conservation Park		18	13
Shenandoah River (Pasture)	INA_45_2807876f		Disposal	5	32
Shenandoah River (Forested Area)	INA_45_2807876g	Conservation Park	Neutral	19	11

### DOC Conservation Values Report Description

A 1318.6098-ha area of beech forest on hillslopes, extending from the floor of both the Maruia and Shenandoah valleys to ridge crest. To the southeast the area adjoins farmland. There are no freshwater fish records from this area, but many are within close proximity both upstream and downstream, most of which could use this area as habitat.

There is occasional hunting, and the rivers are popular for recreational and commercial rafting and kayaking, fly- fishing, and swimming.

### Shenandoah River (Pasture)

### Panel Recommendations

National Panel: Conservation park as an addition to the adjacent Victoria Forest Park, to provide landscape continuity and reflect the identified values.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park for the 'pasture' section of this stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural values present and ensuring ongoing public recreation access.

Section 4 and Treaty principles: The Mana Whenua Panel recommended disposal of the area as the pastoral components are modified, supported by submissions from Treaty partner organisations.

Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present warrant proceeding with the notified proposal.

Rationale: My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. a large area of beech; high predicted water quality, and marsh, seepage, and swamp wetland types). The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_45\_2807876e

### Support

#### Access and Recreation (Allowed)

- Submitters noted recreation values which were not identified by the Panels; "high kayaking and rafting recreational values for a largely unmodified section of the Maruia River" (e.g. "The Maruia River where it runs behind Mt Rutland is a wilderness trip much valued by packrafters").



I recommend that these comments are accepted. The comments provide site-specific details regarding the public access and recreational features present which are consistent with those described in the CVR (“rivers have high use for recreational and commercial rafting and kayaking”). The proposed conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

### Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area’s high ecological and landscape value (e.g. “important for maintaining landscape continuity and connectivity being surrounded on all sides by Victoria Forest Park”).

I recommend that these comments are accepted. My assessment is that the natural values referred to are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area “were central to the beech forest utilisation controversy of the 1970s and they are significant in our country’s conservation history for the Maruia Declaration”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural and historic resources present. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “add to Maruia Ecological Area - better protection”, “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. forested slopes with tributaries of the Warwick and Maruia Rivers) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### Treaty Considerations (Allowed)

- Submissions stated they support the position of the Mana Whenua Panel on the basis that these recommendations reflect the rights and interests of mana whenua (e.g. “The recommendations of the Mana Whenua Panel reflect the values, interests, and perspectives of the Papatipu Rūnanga in whose Takiwā the relevant land is located”).

I recommend that these comments are not accepted. Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present (e.g. forested hillslopes covered in beech forest, with small areas of alluvial flats) warrant proceeding with the notified proposal.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### **Disposal - INA\_45\_2807876f**

*The comments received in relation to the Mana Whenua Panel recommendation are summarised below and have been considered in relation to the notified proposal when forming s.49 allow/accept recommendations.*

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend these comments are not accepted. While the CVR states that there are some areas of modified pasture in the assessment area at the eastern end (developed land at the eastern end encroaching onto the assessment area, which are not permitted), my assessment is that the natural values referred to are appropriately protected under the proposed classification of conservation park, and that disposal would create an enclave within public conservation land.



## Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are not accepted. Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present (e.g. forested hillslopes covered in beech forest, with small areas of alluvial flats) warrant proceeding with the notified proposal.

## General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter recommended addition to the Victoria Forest Park, stating that “the area is of high recreational value, with opportunities for kayaking and rafting on a section of the Maruia River which is wild and largely unmodified. It also includes a large section of the tramping track which leads to Wheel Creek Hut. The Maruia River where it runs behind Mt Rutland is a trip much valued by packrafters. It is considered a wilderness experience”.
- Submissions objected to disposal on the grounds that this represents a loss of public access and ability for future generations to enjoy these areas, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend this comment is accepted to the extent that the public recreational access described is protected under the notified status of conservation park. However, I do not agree that the pastoral components of this area hold any substantial recreational value.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes). A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”. Alternative suggested classifications included scenic reserve or “Ecological Reserve” instead.
- It was noted that disposal would not assist with a reduction in emissions from agriculture.

I recommend these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation, supported by the future-focused elements within the definition of conservation. The developed areas (described in the CVR as tongues of developed land encroaching onto

the assessment area, which are not permitted) are likely to be suitable for restoration as they are largely bounded by public conservation land. Classification as conservation park will support this outcome.

### Ecology and Landscape (Allowed)

- A submitter expressed preference for addition to Victoria Forest Park, suggesting this would be "important for maintaining landscape continuity and connectivity".
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. "disposal will lose the opportunity for regeneration and restoration"). A "precautionary policy" was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. "poor ecological representation in existing protected areas").
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are accepted. While the CVR states that there are some areas of modified pasture in the assessment area at the eastern end (developed land at the eastern end encroaching onto the assessment area, which are not permitted), my assessment is that the natural values referred to are appropriately protected under the proposed classification of conservation park, and that disposal would create an enclave within public conservation land.

- A submitter recommended ecological area, noting that the area is adjacent to land that has a higher protected status than that proposed, and that ecological values appear similar to the adjacent land.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. forested slopes with tributaries of the Warwick and Maruia Rivers) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park.

### Heritage and Culture (Allowed)

- A submitter expressed preference for addition to the Victoria Forest Park, noting the area's significance to the country's conservation history for the Maruia Declaration.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural and historic resources present. The primary purpose of conservation parks includes to be managed so "that its natural and historic resources are protected" (Conservation Act 1987, s. 19(1)(a)).

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, "and only then with the need to maintain the block's cultural, conservation & mahika-kai values".

I recommend that these comments are not accepted. Although I acknowledge the Mana Whenua Panel opposition to the notified proposal, my assessment, considering those submissions accepted, is that the natural and historic resources present (e.g. forested hillslopes covered in beech forest, with small areas of alluvial flats) warrant proceeding with the notified proposal.

### General (Allowed)

- Submitters expressed preference for the land to be classified as a conservation park and added to Victoria Forest Park without providing further justification.
- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for

maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.
- A submitter stated “The National Panel is recommending 65 hectares for disposal, but has recommended up to an additional 1000 hectares of land may be disposed of where there is pastoral land alongside river conservation areas (subject to survey). This is not explained or justified”.
- A submitter advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation, supported by the future-focused elements within the definition of conservation. The developed areas (described in the CVR as tongues of developed land encroaching onto the assessment area, which are not permitted) are likely to be suitable for restoration as they are largely bounded by public conservation land. Classification as conservation park will support this outcome.

### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for



authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Shenandoah River (Forested Area)

### Panel Recommendations

National Panel: Conservation park as an addition to the adjacent Victoria Forest Park, to provide landscape continuity and reflect the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park for the ‘forested area’ of this stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. beech forest and localised wetlands) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## **Conservation Park - INA\_45\_2807876g**

### Support

#### Access and Recreation (Allowed)

- Submitters noted kayaking and rafting recreation values which were not identified by the Panels (e.g. “high kayaking and rafting recreational values for a largely unmodified section of the Maruia River”, “The Maruia River where it runs behind Mt Rutland is a wilderness trip much valued by packrafters”).

I recommend that these comments are accepted. The comments provide site-specific details regarding the public access and recreational features present which are consistent with those described in the CVR (“rivers have high use for recreational and commercial rafting and kayaking”). The proposed conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Ecology and Landscape (Allowed)

- Submitters supported the proposed classification as reflecting the area’s high ecological and landscape value (e.g. “important for maintaining landscape continuity and connectivity being surrounded on all sides by Victoria Forest Park”).

I recommend that these comments are accepted. My assessment is that the natural values referred to are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

#### Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area “were central to the beech forest utilisation controversy of the 1970s and they are significant in our country’s conservation history for the Maruia Declaration”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural resources present and recognises their significance as described in the CVR. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”, advocating for classification as ecological area).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. forested slopes with tributaries of the Warwick and Maruia Rivers) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.



### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification (e.g. “Include in Maruia Ecological Area”).
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and

historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_46 – Warwick River – 2807455

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Warwick River	INA_46_2807455s	Conservation Park	Neutral	17	11

### DOC Conservation Values Report Description

A 149.7286-ha area consisting of the lower forested slopes on the eastern side of Warwick River. It encapsulates several tributaries of Warwick River, a tributary of Maruia River, and a part headwater of the larger Buller catchment. Sandwiched between land that has been cleared for farming and Victoria Forest Park (upslope). Access is difficult but there may be occasional hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to provide landscape continuity across the area. The area has high natural values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural and recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. forested slopes with limited recreational access) are appropriately protected under the proposed classification. The area is sandwiched between the Victoria Forest Park and heavily modified farmland. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_46\_2807455s

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed classification, noting that the “Warwick River is used to access the Maruia River”.

I recommend that these comments are accepted. The comments provide site-specific details regarding the recreational values present which are allowed for under the proposed classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Ecology and Landscape (Allowed)

- Submitters supported the recommendation as “a logical extension to the forested slopes on Mt Rutland within Victoria Forest Park”, advocating for “an extension of the adjacent Central Maruia Ecological Area overlay”.



I recommend that these comments are accepted to the extent that I agree that the values present are protected by the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)). I note that submitters have recommended the addition of an ecological overlay, however, any such addition is not within the scope of what was notified for this reclassification process.

### Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area “were central to the beech forest utilisation controversy of the 1970s and they are significant in our country’s conservation history for the Maruia Declaration”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural resources present as described in the CVR and note the connection of the wider area to the Maruia Declaration. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”, advocating for classification as ecological area).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. forested slopes with tributaries of the Warwick and Maruia Rivers) and the

points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification (e.g. “better protection Ecological area”).
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_46 – Warwick River – 2807879

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Warwick River	INA_46_2807879t	Conservation Park	Neutral	18	11

### DOC Conservation Values Report Description

An 80.4064-ha area consisting of the lower forested slopes on the eastern side of Warwick River. It encapsulates several tributaries of Warwick River, a tributary of Maruia River, and a part headwater of the larger Buller catchment. Sandwiched between land that has been cleared for farming and Victoria Forest Park (upslope). Access is difficult, but there may be occasional hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to provide landscape continuity across the area. The area has high natural values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural and recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (forested slopes with limited recreational access) are appropriately protected under the proposed classification. The area is sandwiched between the Victoria Forest Park and heavily modified farmland. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_46\_2807879t

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed classification, noting that the “Warwick River is used to access the Maruia River”.

I recommend that these comments are accepted. The comments provide site-specific details regarding the recreational values present which are allowed for under the proposed classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Ecology and Landscape (Allowed)

- Submitters supported described the recommendation as “a logical extension to the forested slopes on Mt Rutland within Victoria Forest Park”, advocating for “an extension of the adjacent Central Maruia Ecological Area overlay”.

I recommend that these comments are accepted to the extent that I agree that the values present are protected by the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)). I note that submitters have recommended the addition of an ecological overlay, however, any such addition is not within the scope of what was notified for this reclassification process.

### Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area “were central to the beech forest utilisation controversy of the 1970s and they are significant in our country’s conservation history for the Maruia Declaration”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural resources present as described in the CVR and note the connection of the wider area to the Maruia Declaration. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “add to Ecological area adjoining- better protection than Forest park”, “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. forested slopes with tributaries of the Warwick and Marula Rivers) and the points raised do not warrant overturning the notified intention. The addition of the area to the Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.



### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_47 – Caves Road – 2799320

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Caves Road	INA_47_2799320u	Conservation Park	Neutral	22	18

### DOC Conservation Values Report Description

A 307.6157-ha area of mostly forested hillslope in the Rappahannock and Caves Stream catchments, surrounded by Victoria Forest Park, and with high levels of naturalness. Scarlet mistletoe has been recorded. There is access but no tracks or facilities, and the area is likely only used for occasional hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to provide landscape continuity across this extensive forest area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. forested slopes with areas of regenerating forest and streams with high levels of naturalness) are appropriately protected under the proposed classification. The area shares a boundary with Victoria Forest Park and the addition of the area to Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_47\_2799320u

### Support

#### Access and Recreation (Allowed)

- A submitter noted the area to contain recreation values not identified by the Panels (e.g. “Caves Stream provides walking access that connects to Rappahannock Saddle which provides public access to upper reaches of the Glenroy River”).

I recommend that these comments are accepted. The comments provide site-specific details regarding the recreational values present which are allowed for under the proposed classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Ecology and Landscape (Allowed)

- A submitter supported the proposed classification as reflecting the area’s high ecological and landscape value (e.g. “a logical extension to Victoria Forest Park which surrounds it”, “these areas contain high ecological values very similar to the existing National Parks, in places including ecosystems untouched by humans”).

I recommend that these comments are accepted. They provide site-specific details regarding the natural resources present. My view is that the natural resources identified in these comments are consistent with those described in the CVR and they are appropriately protected and preserved by the proposed classification.

### Treaty Considerations (Allowed)

- A submitter advocated that if stewardship land is deemed to be of “National Park quality, true co-management with Tangata whenua of all National Park and Doc managed land must be a prerequisite”, noting that this should apply to all DOC and LINZ managed land in the region.

I recommend that these comments are not accepted. Potential changes to management or legislative frameworks are not the subject of the public notice, and national park was not the classification proposed.

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter raised concern about failure to identify the recreational values present. No specific recreation values were raised.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate



options, dependent on the values present (e.g. “Add to Ecological area, better protection”, “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. indigenous forest with high levels of naturalness) and the points raised do not warrant overturning the notified intention. The addition of the area to Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification (e.g. “Better to include it in the national park”).
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a

hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_47 – Diamond Creek – 2799321

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Diamond Creek	INA_47_2799321v	Conservation Park	Neutral	23	18

### DOC Conservation Values Report Description

A 553.4861-ha area of mostly forested hillslope in the Rappahannock and Caves Stream catchments, surrounded by Victoria Forest Park, and with high levels of naturalness. Scarlet mistletoe has been recorded. There is access, but the area is likely only used for occasional hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to provide landscape continuity across this extensive forest area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural values present and noted recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. forested slopes with areas of regenerating forest and streams with high levels of naturalness) are appropriately protected under the proposed classification. The area shares a boundary with Victoria Forest Park and the addition of the area to Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_47\_2799321v

### Support

#### Access and Recreation (Allowed)

- A submitter noted the area to contain recreation values not identified by the Panels (e.g. “Caves Stream provides walking access that connects to Rappahannock Saddle which provides public access to upper reaches of the Glenroy River”).

I recommend that these comments are accepted. They provide site-specific details regarding the recreational values present which are allowed for under the proposed classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Ecology and Landscape (Allowed)

- A submitter supported the proposed classification as reflecting the area’s high ecological and landscape value (e.g. “a logical extension to Victoria Forest Park which surrounds it”, “these areas contain high ecological values very similar to the existing National Parks, in places including ecosystems untouched by humans”).



- It was noted that the area “needs ecological area overlay for consistency with contiguous areas”.

I recommend that these comments are accepted to the extent that they support the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)). I note that the submitter has recommended the addition of an ecological overlay, however, any such addition is not within the scope of what was notified for this reclassification process.

### Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area “were central to the beech forest utilisation controversy of the 1970s and they are significant in our country’s conservation history for the Maruia Declaration”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural resources present as described in the CVR and note the connection of the wider area to the Maruia Declaration. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### Treaty Considerations (Allowed)

- A submitter advocated that if stewardship land is deemed to be of “National Park quality, true co-management with Tangata whenua of all National Park and Doc managed land must be a prerequisite”, noting that this should apply to all DOC and LINZ managed land in the region.

I recommend that these comments are not accepted. Potential changes to management or legislative frameworks are not the subject of the public notice, and national park was not the classification proposed.

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- A submitter raised concern about failure to identify the recreational values present. No specific recreation values were raised.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “Add to Ecological area, better protection”, “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. indigenous forest with high levels of naturalness) and the points raised do not warrant overturning the notified intention. The addition of the area to Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification (e.g. “national park”).
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

##### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

##### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_47 – Rappahannock River – 2807878

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Rappahannock River	INA_47_2807878w	Conservation Park	Neutral	18	11

### DOC Conservation Values Report Description

A 333.6929-ha area of mostly forested hillslope in the Rappahannock and Caves Stream catchments, partially surrounded by Victoria Forest Park, and with high levels of naturalness. Scarlet mistletoe has been recorded. There is access but it's likely only used for occasional hunting.

### Panel Recommendations

National Panel: Conservation park as an addition to the adjoining Victoria Forest Park, to provide landscape continuity across this extensive forest area.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as offering protection for the natural values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. forested slopes with areas of regenerating forest and streams with high levels of naturalness) are appropriately protected under the proposed classification. The area shares a boundary with Victoria Forest Park, and the addition of the area to Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_47\_2807878w

### Support

#### Access and Recreation (Allowed)

- A submitter noted the area to contain recreation values not identified by the Panels (e.g. “Caves Stream provides walking access that connects to Rappahannock Saddle which provides public access to upper reaches of the Glenroy River”).

I recommend that these comments are accepted. The comments provide site-specific details regarding the recreational values present which are allowed for under the proposed classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### Ecology and Landscape (Allowed)

- A submitter supported the proposed classification as reflecting the area’s high ecological and landscape value (e.g. “a logical extension to Victoria Forest Park which surrounds it”).
- A submitter advocated that the area also warrants an ecological area overlay.

I recommend that these comments are accepted to the extent that they support the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)). I note that the submitter has recommended the addition of an ecological overlay, however, any such addition is not within the scope of what was notified for this reclassification process.

### Historic and Cultural Values (Allowed)

- A submitter supported the proposed conservation park addition, noting that the forests in the area “were central to the beech forest utilisation controversy of the 1970s and they are significant in our country’s conservation history for the Maruia Declaration”.

I recommend that these comments are accepted. I agree that the proposed conservation park appropriately protects the natural resources present as described in the CVR and note the connection of the wider area to the Maruia Declaration. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present (e.g. “Add to Ecological area, better protection”, “land parcel has ecological values that appear similar to those on other nearby land with a higher protected status”).

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. indigenous forest with high levels of naturalness) and the points raised do

not warrant overturning the notified intention. The addition of the area to Victoria Forest Park will provide consistent protection for the forested areas and landscape continuity. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

#### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.



I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_48 – Maruia River – 2807880

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Maruia River	INA_48_2807880x	Scenic Reserve (a)	Neutral	11	5

### DOC Conservation Values Report Description

A 5.1199-ha isolated area of beech forest on a hillslope surrounded by farmland forestry, with no apparent waterways or wetlands. No permissions are recorded, but land is being used as part of an adjoining farm and there seems to be an access road to a house. There is some potential heritage interest, but no sites recorded.

### Panel Recommendations

National Panel: Scenic reserve (a).

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. beech forest).

## Scenic Reserve (a) - INA\_48\_2807880x

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing uses”.
- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.



## INA\_49 – Rappahannock River – 2807881

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Rappahannock River	INA_49_2807881y	Scenic Reserve (a)	Neutral	12	5

### DOC Conservation Values Report Description

A 146.1514-ha area predominantly of indigenous forest, extending either side of the tributary stream to the ridge. The area also contains areas of wetland pasture and, except for forest land to the north and east, is largely surrounded by farmland isolated from other public conservation land. Grazing in the cleared and grazed area in the southern central piece (approximately 1.1 ha) and along the western edge is unauthorised. Access is difficult.

### Panel Recommendations

National Panel: Scenic reserve (a), to protect the identified values and providing for landscape and natural character continuity.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. indigenous forest).

## Scenic Reserve (a) - INA\_49\_2807881y

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing uses”.
- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_50 – Maruia River – 2807882

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Maruia River (Riverbed)	INA_50_2807882h	Local Purpose (River Conservation) Reserve	Neutral	11	12
Maruia River (Pasture)	INA_50_2807882i	Disposal	Disposal	7	32

### DOC Conservation Values Report Description

A 31.6223-ha area made up of four separate parcels of actively farmed alluvial flats, old riverbed, and active channel associated with Maruia River. These are highly developed areas of grazed land, surrounded by freehold properties. While currently used for pastoral farming, the flats could provide a protective riparian buffer for the river. A grazing concession is in place.

### Maruia River (Riverbed)

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve will help support the preservation of the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the 'riverbed' section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_50\_2807882h

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve, noting that the area "provides or protects actual or potential public access as the river move" and that the area is of "angler interest". It was noted that parcel title 467404 was "retained in Crown ownership to provide access to the Maruia River here, when the formed road was diverted north", advocating for classification as LPR (river access) for this parcel.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources



described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification “given the propensity for increased flooding with climate change”, noting that the area is within the river floodplain.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- A submitter supported the proposed classification to provide a “buffer for the river”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the “information in the technical reports”.
- A submission supported the highest possible classification for the land as it has “high cultural conservation value”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area “will be subject to flooding from climate change effects” and should be classified to promote re-vegetation and “become part of our emission reduction programme”.
- A submitter suggested that the area “may be necessary for flood mitigation and adaption”.
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the “important conservation outcomes that could be achieved in the future”.
- A submitter advocated for government purpose (river floodplain) reserve to provide “opportunities for ecosystem restoration in response to flood events or coastal erosion” and “opportunities for carbon sequestration”.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification “provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development”, citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (alluvial flats, old riverbed and active channel).

- A submission opposed the classification as it does not address management at “an ecosystem or catchment level” and therefore misses the opportunity to build resilience.

- One submission suggested that the proposed classification does not give consideration “to the very high and nationally important natural conservation values of the rivers”.
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status will affect existing uses”.
- A submitter advocated for a scenic reserve (b) “or fencing and pest management as part of grazing concessions”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## Maruia River (Pasture)

### Panel Recommendations

National Panel: Disposal should be considered for this stable area of developed pasture.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## Disposal - INA\_50\_2807882i

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The stewardship areas recommended for disposal consist of highly developed areas of grazed land. I agree that the low conservation values warrant referring these areas to the Department for a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of the pastoral components of this stewardship area (e.g. highly developed areas of grazed land) justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

#### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.



As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submitters recommended local purpose reserve to ensure public access to the river is retained. One commented that the conservation values report notes recreational access to the river is not easy due to freehold land surrounding it, and suggested that the area was previously road and likely “to have been retained in Crown ownership to provide access to the Maruia River here, when the formed road was diverted north”. One submitter proposed various purposes for the recommended reserve, e.g. “river conservation, river access, or recreation access”.
- A submitter opposed disposal for “patches of river edges that are valued for recreation”, commenting that “some are just good to look at or to enjoy a roadside picnic”.
- Submissions objected to disposal on the grounds that this represents a loss of public access and ability for future generations to enjoy these areas, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. As the CVR states the stewardship areas are surrounded by freehold land and there is no easy access to the areas, they do not secure practical access to the Maruia River. The areas, which consist of grazed pasture, are unlikely to hold recreation values that warrant retention as public conservation land. The modified nature of the pastoral components of this stewardship area (e.g. highly developed areas of grazed land) justifies referring this area to the Department to investigate the suitability of disposal.

### Climate Change and Natural Hazards (Allowed)

- Submitters recommended the area be reclassified as a local purpose reserve, noting that it is within the river floodplain and that increased flooding is likely with climate change. One specified “Local Purpose (River Conservation for ecological reasons) Reserve”, stating that “while currently used for pastoral farming, the flats could provide a protective riparian buffer for the river. There is potential use as riparian margin protection against flooding, erosion and river shift”.
- Another suggested GPR (river floodplain), noting there are “opportunities for ecosystem restoration in response to flood events or coastal erosion; opportunities for carbon sequestration”.
- A submitter who noted that “the land may be necessary for flood mitigation and disposal” suggested “more investigation is required”.
- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “in almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.
- It was noted that disposal will not assist with a reduction in emissions from agriculture.

I recommend these comments are not accepted. The highly modified nature of the area and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Ecology and Landscape (Allowed)

- A submitter noted that there are “retention of good opportunities for restoration of depleted indigenous ecosystems”, recommending GPR (river floodplain)”.
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are not accepted. The highly modified nature of the area and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

## Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the blocks cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

## General (Allowed)

- A submitter recommended scenic reserve (b) without providing further detail.
- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter opposed disposal due to concern that the change in status will affect existing uses.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for

future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.

- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.
- A submitter stated “The National Panel is recommending 65 hectares for disposal, but has recommended up to an additional 1000 hectares of land may be disposed of where there is pastoral land alongside river conservation areas (subject to survey). This is not explained or justified”.
- A submitter advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.
- It was recommended that opportunities for a land swap be investigated.
- A submitter recommended the area should be “assessed on-site to ensure remaining ecological and hydrological values are adequately buffered and linked”.
- A submitter suggested “fencing and pest management as part of grazing concessions”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### No Opinion/Position Stated

##### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend these comments are not accepted. The highly modified nature of the area and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

##### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_51 – Station Creek – 2807490

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Station Creek	INA_51_2807490a	Conservation Park	Neutral	15	10

### DOC Conservation Values Report Description

A 240.4063-ha block of forested land on hill slopes and alluvial terrace in the Maruia River and Station Creek catchments. A number of threatened and at-risk species are here. At the top of the hill at the northern end, about 5 ha has been cleared and looks to be used as part of the neighbouring property – it is not under any sort of permit or licence. The block is full of old logging haul roads, and Timberlands sequestration trial plots. There is access, but no tracks or facilities. Occasional deer hunting occurs.

### Panel Recommendations

National Panel: Conservation park as an addition to Victoria Forest Park, to provide protection of its natural resources and continuity of landscape with the surrounding areas including connecting to Maruia River.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of conservation park.

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification as recognising the recreational values present.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the natural resources present (e.g. modified regenerating beech forest) are appropriately protected under the proposed classification. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

## Conservation Park - INA\_51\_2807490a

### Support

#### Access and Recreation (Allowed)

- A submitter noted that “there are a myriad of tracks both in this area and adjacent areas that are used by four wheel drivers”, requesting that the current level of 4WD access is “maintained under the re-classification”.

I recommend that these comments are accepted. The comments provide site-specific details regarding the recreational values present which can be considered under the proposed classification. The conservation park will be managed “to facilitate public recreation and enjoyment”, subject to the protection of the natural and historic resources present (Conservation Act 1987, s. 19(1)(b)).

#### General (Allowed)

- Submissions expressed general support for the classification without providing further justification, or agreed it reflected the “information in the technical reports”.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed “trust that Conservation Park status will provide full protection from any future mining applications in these areas”.
- A submission advocated for retaining the area in stewardship or reclassifying it as a conservation park, suggesting these provide “more than adequate legal protection”.
- A submission supported conservation park status and advocated for greater protection from “intrusive development” such as mining and hydro schemes, stating that “most of the Southern Alps deserves protection equivalent to that of National Park status”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- A submission suggested that the implementation of the proposed classification “needs to be followed up with sufficient funding for pest eradication”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Oppose

#### Ecology and Landscape (Allowed)

- Submitters were concerned that the conservation park classification did not represent the high values described in the recommendation reports (e.g. area may have “the last remnants of a range of insects, snails, lizards, or plant speciation that may be nationally at-risk, endangered, or threatened”).
- Submissions recommended a higher level of protection due to the values present, suggesting national park, ecological area, wildlife management area or scenic, nature, scientific and recreation reserve, as more appropriate options, dependent on the values present.

I recommend that these comments are not accepted. My conclusion is that the natural resources present are appropriately protected under the proposed classification (e.g. modified beech forest) and the points raised do not warrant overturning the notified intention. This recommendation is further supported by the shared boundary with Victoria Forest Park. The primary purpose of conservation parks includes to be managed so “that its natural and historic resources are protected” (Conservation Act 1987, s. 19(1)(a)).

- Submitters noted that the proposed conservation parks are in close proximity to one another and “it appears to be an inefficient way of managing land for conservation”. It was recommended to combine the proposed parks where the values are similar as this “provides greater opportunity for large landscape scale management”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

#### General (Allowed)

- Submissions advocated for a higher level of protection than that proposed without providing further justification.
- A submitter suggested that the level of protection offered by a conservation park was unclear.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

#### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter expressed general concern about the low protection offered by conservation park, noting that “Conservation Parks do not protect against the establishment of mines on conservation land”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- Submitters advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- One submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### Ecology and Landscape (Allowed)

- A submission suggested consideration be given to amalgamating the proposed areas into larger parks and ensuring it “is the best fit for the identified value”.

I recommend these comments are not accepted. There are no specifications in the Conservation Act 1987 or Conservation General Policy regarding the size or proximity of distinct conservation parks.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

### Other (Not Allowed)

- A submitter advocated for new conservation parks to “come with additional Government funding for better biodiversity work and more pest control”.

As I have recommended these comments are not allowed, I recommend they are not accepted.



## INA\_52 – Woolley River - Maruia – 2807486

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Woolley River - Maruia	INA_52_2807486b	Scenic Reserve (a)	Neutral	11	4

### DOC Conservation Values Report Description

A 133.1766-ha area of hillslope forest adjacent to Woolley River in the Maruia Valley. There is no easy access to this area as it is surrounded by freehold properties. Although there are no records of freshwater fish/invertebrates within the stream, water quality is predicted to be high, and the catchment very natural. Several threatened species have been recorded and may be present.

### Panel Recommendations

National Panel: Scenic reserve (a), to provide landscape continuity as well as protect the natural values present.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal of scenic reserve (a).

Summary of accepted submissions: Those submissions accepted as holding merit supported the notified classification suggesting it offers sufficient protection in the context of climate change.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: My conclusion is that the proposed classification will appropriately promote the conservation of the natural and historic resources present (e.g. hillslope forest, predicted high water quality).

## Scenic Reserve (a) - INA\_52\_2807486b

### Support

#### Climate Change and Natural Hazards (Allowed)

- A submitter supported the proposed classification as offering a high level of protection “in light of the impacts of climate change”.

I recommend that these comments are accepted. I agree that the protection of the existing natural resources present is of increasing importance when considering the need for climate mitigation. Classification as scenic reserve will support this outcome. The relevance of this factor for reclassification decisions is evident when the future-focused elements in the definition of conservation are considered, including, “safeguarding the options of future generations”, in relation to ‘natural resources’, “the air, water and soil in or on which any plant or animal lives or may live”, and in relation to ‘protection’ of a resource, “restoration to some former state and its augmentation, enhancement, or expansion” (Conservation Act 1987, s. 2).

#### General (Allowed)

- Submissions expressed general support for the proposed classification, referencing the “information in the technical reports” or without providing further justification.
- A submitter noted their preference for all stewardship land to be reclassified at the highest possible level based on its “high cultural conservation value”.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters for further consideration.

## Oppose

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submission opposed reclassification as scenic reserve, noting that though it does not prohibit mining it adds extra restrictions with consequent negative economic benefits, suggesting that retaining the land in stewardship or reclassifying it as a conservation park provides adequate legal protection while allowing commercial activities such as mining to be considered on a case-by-case basis.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the extent of land notified.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- A submission opposed all reclassification of stewardship land unless it was purchased by the Nature Heritage Fund for the purpose of adding it to a national park.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. Insufficient information is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification. The proposed classification does not prohibit public access for the activities if authorised, for example, in a hunting permit. Authorisation of such activities involves a separate decision-making process, the outcome of which would depend on effects on the conservation values present rather than the proposed land classification.

### General (Allowed)

- A submission advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted for further consideration. The legislation does not provide for absolute protection from development – rather it contemplates that some activities may be acceptable and provides a mechanism for authorising such activities, through the grant of concessions. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised which supports reconsideration of the notified classification.

## INA\_53 – Maruia River – 2807487

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Maruia River (Riverbed)	INA_53_2807487w	Local Purpose (River Conservation) Reserve	Neutral	11	13
Maruia River (Pasture)	INA_53_2807487x	Disposal	Disposal	9	31

### DOC Conservation Values Report Description

A 49.9501-ha area of alluvial flats along Maruia Valley dominated by pasture and riparian willow, with small areas of riverbed gravels, rank grass and exotic shrubs. This area covers sections of Maruia River that are within the dwarf galaxia species management unit, and likely support diverse freshwater fish communities. Several other threatened species may be present. There is no easy access as the areas are surrounded by freehold properties.

### Maruia River (Riverbed)

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve to provide appropriate protection for the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the ‘riverbed’ section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that “there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present.”

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_53\_2807487w

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve, noting that the area “provides or protects actual or potential public access as the river move” and that the area is of “angler interest”.
- A submitter supported the proposed River Conservation classification for the central of the three parcels which border the submitters farm, noting recreation values associated with occasional use for fishing.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources



described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the "information in the technical reports".
- A submission supported the highest possible classification for the land as it has "high cultural conservation value".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Other (Not Allowed)

- A submitter noted that "when it comes up for sale, we would be interested in purchasing it".

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area "will be subject to flooding from climate change effects" and should be classified to promote re-vegetation and "become part of our emission reduction programme".
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the "important conservation outcomes that could be achieved in the future".
- A submitter advocated for government purpose (river floodplain) reserve to provide "opportunities for ecosystem restoration in response to flood events or coastal erosion" and "opportunities for carbon sequestration".

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification "provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development", citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (riverbed and margins including pasture with some native forest and regenerating forest).

- A submission opposed the classification as it does not address management at "an ecosystem or catchment level" and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration "to the very high and nationally important natural conservation values of the rivers".
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

## General (Allowed)

- A submitter opposed the proposed classification as it “gives no greater protection than the current Stewardship status”.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.
- A submitter advocated for disposal of the “the two sections completely within the farm”, noting that they “form valuable parts of the Dairy farming operation and we have invested a lot over the years in the form of flood erosion protection and general pasture improvements”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.
- A submitter advocated for disposal of the “the two sections completely within the farm”, noting these areas to be of low conservation value (e.g. “we do not see any justification for any conservation efforts”).

As I have recommended these comments are not allowed, I recommend they are not accepted.

## No Opinion/Position Stated

### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## Maruia River (Pasture)

### Panel Recommendations

National Panel: Disposal should be considered for this stable area of developed pasture.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## **Disposal - INA\_53\_2807487x**

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The stewardship areas recommended for disposal are modified (dominated by pasture and riparian willow). It is my view that the low conservation values warrant referring these areas to the Department for a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of the pastoral components of this stewardship area (e.g. dominated by pasture and riparian willow) justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.



## Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter noted that the land is currently farmed by various families (e.g. “We note our land has for the purpose of this review response been parcelled together with land farmed by the Gibbs and Inch families and support them and others in similar situations in their bid to obtain freehold title to operational parts of their farms”).

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Other (Not Allowed)

- Submitters expressed their interest in purchasing the area or parts of it, or expressed support for the current concessionaires to purchase the areas they farm.
- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submitters recommended local purpose reserve to protect public access, with a submitter proposing various purposes e.g. “River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”. It was noted that “riparian access via marginal strips is not guaranteed”.
- It was suggested that there are potential recreation values associated with the river which would preclude disposal (e.g. “While demand for these activities in this specific area may be low right now, there is potential for expansion in the future when Tourists and even Cantabrians discover them”). The river was also described as “famous for its fishing already” and as an example of a braided river with “the potential to revert to natural vegetation that make traversing New Zealand’s natural rivers such a joy”.
- Submissions objected to disposal on the grounds that this represents a loss of public access and ability for future generations to enjoy these areas, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. As the CVR states the stewardship areas are surrounded by freehold land and there is no easy access to the areas, they do not secure practical access to the Maruia River. The areas, which consist of grazed pasture, are unlikely to hold recreation values that warrant retention as public conservation land. The modified nature of the pastoral components of this stewardship area (e.g. dominated by pasture and riparian willow) justifies referring this area to the Department to investigate the suitability of disposal.

### Climate Change and Natural Hazards (Allowed)

- A submitter recommended GPR (river floodplain), noting that there are “opportunities for ecosystem restoration in response to flood events or coastal erosion; opportunities for carbon sequestration”.
- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.
- It was noted that disposal will not assist with a reduction in emissions from agriculture.

I recommend these comments are not accepted. The modified nature of the area (dominated by pasture and riparian willow) and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Ecology and Landscape (Allowed)

- Submitters in opposition to disposal advocated for the area to be retained, highlighting that braided rivers are acutely threatened and provide habitat for various bird species, and that the areas "cover or adjoin reaches of the Maruia Valley that are important for the habitat for dwarf galaxias". It was argued that disposal would "reduce the beauty and habitat or potential habitat". Local purpose (river conservation for ecological reasons) reserve was suggested, while another submitter proposed GPR (river floodplain), noting there are "good opportunities for restoration of depleted indigenous ecosystems". One submitter stated, "retain any areas that have any chance of regenerating native cover, that protect riparian areas".
- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. "disposal will lose the opportunity for regeneration and restoration"). A "precautionary policy" was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. "poor ecological representation in existing protected areas").
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are not accepted. The modified nature of the area (dominated by pasture and riparian willow) and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, "and only then with the need to maintain the block's cultural, conservation & mahika-kai values".

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive "conservation & mahika-kai values".

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported "a cautionary approach" and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Disposal was opposed due to "concern that change in status or disposal will affect the existing uses. Two grazing licences are in place - one for 5.5 ha and the other for 8.5 ha of Maruia River riverbed".

- A submitter noted that two of the three southern parcels of the conservation area are important parts of their farming system which are currently leased.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.
- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.
- A submitter stated “The National Panel is recommending 65 hectares for disposal, but has recommended up to an additional 1000 hectares of land may be disposed of where there is pastoral land alongside river conservation areas (subject to survey). This is not explained or justified”.
- A submitter stated that if a national park classification is “politically unpalatable, then political judgement calls must be made by accountable politicians, not by the Panel”.
- A submitter advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”, or stipulated that “more stringent controls on grazing to prevent further pollution of the water should be enacted”.
- A submitter expressed a desire to freehold the areas they currently farm which contain pasture and no conservation values.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend these comments are not accepted. The highly modified nature of the area (dominated by pasture and riparian willow) and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.



#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_53 – Maruia River – 2807884

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
Maruia River (Riverbed)	INA_53_2807884j	Local Purpose (River Conservation) Reserve	Neutral	11	12
Maruia River (Pasture)	INA_53_2807884k	Disposal	Disposal	8	31

### DOC Conservation Values Report Description

A 20.3357-ha area of alluvial flats along Maruia Valley dominated by pasture and riparian willow, with small areas of riverbed gravels, rank grass and exotic shrubs. This area covers a section of the Maruia River that is within the dwarf galaxia species management unit, and likely supports diverse freshwater fish communities. Several other threatened species may be present. There is no easy access as the area is surrounded by freehold properties.

### Maruia River (Riverbed)

### Panel Recommendations

National Panel: Local purpose (river conservation) reserve to provide appropriate protection for the identified values.

Mana Whenua Panel: Neutral.

### S.49(2)(d) Recommendation

- Do not proceed with the notified proposal of local purpose (river conservation) reserve for the 'riverbed' section of the stewardship area.

Summary of accepted submissions: Those submissions accepted as holding merit expressed opposition to the notified classification on the basis that the purpose of the reserve is not clearly defined, leaving it uncertain how the natural resources present in this section of the stewardship area will be protected.

Section 4 and Treaty principles: The Mana Whenua Panel did not oppose the proposed classification.

No specific Ngāi Tahu interests were raised for consideration by the Mana Whenua Panel for this stewardship area. I acknowledge statements of the Mana Whenua Panel that "there is a deep connection between Ngāi Tahu and all of the whenua in the Ngāi Tahu takiwā, and the absence of site-specific values in the preliminary analysis does not detract from that connection, nor does it confirm that site-specific values are not present."

Rationale: Further policy work by the Department is required to describe the purpose of the proposed reserve and to identify any potential management or concession implications. This process will provide clarity as to whether the proposed local purpose reserve reflects the natural and historic resources present, or if another classification is more appropriate.

## Local Purpose (River Conservation) Reserve - INA\_53\_2807884j

### Support

#### Access and Recreation (Allowed)

- A submitter supported the proposed reserve, noting that the area "provides or protects actual or potential public access as the river move" and that the area is of "angler interest".

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

### General (Allowed)

- Submissions expressed general support for the proposed classification without providing further justification, or agreed the classification reflected the "information in the technical reports".
- A submission supported the highest possible classification for the land as it has "high cultural conservation value".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.

### Oppose

#### Climate Change and Natural Hazards (Allowed)

- A submission expressed concern that the area "will be subject to flooding from climate change effects" and should be classified to promote re-vegetation and "become part of our emission reduction programme".
- One submitter noted the classification does not consider the nationally important role rivers can play in climate change mitigation and adaption (e.g. regeneration, carbon sequestration and buffering) and the "important conservation outcomes that could be achieved in the future".
- A submitter advocated for government purpose (river floodplain) reserve to provide "opportunities for ecosystem restoration in response to flood events or coastal erosion" and "opportunities for carbon sequestration".

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

#### Ecology and Landscape (Allowed)

- Submissions opposed reclassification as a local purpose reserve due to insufficient information regarding the purpose of the reserve, and consequent concern that ecological and other values would not be protected.
- Submitters were concerned that the proposed classification "provides no confidence that freshwater values or river margins and corridors will be protected from inappropriate use and development", citing other examples of this classification in the lower Rangitata catchment.

I recommend that these comments are accepted. I agree that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately promotes the conservation of the natural resources present (alluvial flats with small areas of riverbed gravels, rank grass and exotic shrubs).

- A submission opposed the classification as it does not address management at "an ecosystem or catchment level" and therefore misses the opportunity to build resilience.
- One submission suggested that the proposed classification does not give consideration "to the very high and nationally important natural conservation values of the rivers".
- Submitters advocated for river areas to be given the same status as adjoining public conservation land, while one submitter advocated for government purpose reserve (Te Mana O Te Wai) where no adjoining classifications exist.
- Submitters suggested that ecological area, wildlife management area or scenic reserve may be appropriate alternatives. One submitter advocated for a government purpose (climate mitigation) reserve.

I recommend that these comments are accepted to the extent that I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate.

### General (Allowed)

- A submitter opposed the proposed classification as it "gives no greater protection than the current Stewardship status".

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised for further consideration.



### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter raised concern that a “change in status or disposal will affect the existing permissions”, referencing a grazing licence over an area.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- A submission opposed the recommendation on the basis that no reclassifications should proceed without a full socioeconomic assessment undertaken by the Department in partnership with the local/regional councils.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- One submission expressed concern about the precedent potentially set by the Panels’ recommendations and suggested that “more appropriate recommendations for these nationally important natural values and strategic outcomes for dynamic ecosystems” were needed.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Other (Not Allowed)

- Submissions opposed local purpose reserve classifications as “they can have their status changed without notification”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Access and Recreation (Allowed)

- Submissions queried whether the proposed classification allows hunting, fishing and “provision for public access”.

I recommend that these comments are not accepted. I have concluded based on comments in opposition that the purpose of the notified classification provides insufficient detail to comment on whether it appropriately protects the natural resources described, or if another classification may be more appropriate. Any limits on public access will be determined as part of any future policy work.

## Maruia River (Pasture)

### Panel Recommendations

National Panel: Disposal should be considered for this stable area of developed pasture.

Mana Whenua Panel: Disposal, as the pastoral components are highly modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal for the 'pasture' section of this stewardship area, referring the area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the pastoral components are highly modified.

Rationale: Although parts of the wider stewardship area are unlikely to meet the Conservation General Policy (6d) and Conservation Act (s. 26) tests for disposal, the pastoral components hold little conservation value and warrant further consideration as to the suitability of disposal.

## Disposal - INA\_53\_2807884k

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The stewardship areas recommended for disposal are modified (dominated by pasture and riparian willow). It is my view that the low conservation values warrant referring these areas to the Department for a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.

I recommend that these comments are accepted. I agree that the modified nature of the pastoral components of this stewardship area justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel has supported the proposed disposal investigation.

#### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

#### Other (Not Allowed)

- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submitters recommended local purpose reserve to protect public access, with a submitter proposing various purposes e.g. “River Conservation, River Access or Recreation Access to ensure public access is retained in perpetuity”. It was noted that “riparian access via marginal strips is not guaranteed”.
- It was suggested that there are potential recreation values associated with the river which disposal would preclude (e.g. “While demand for these activities in this specific area may be low right now, there is potential for expansion in the future when Tourists and even Cantabrians discover them”). The river was also described as “famous for its fishing already” and as an example of a braided river with “the potential to revert to natural vegetation that make traversing New Zealand’s natural rivers such a joy”.
- Submissions objected to disposal on the grounds that this represents a loss of public access and ability for future generations to enjoy these areas, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. As the CVR states the stewardship areas are surrounded by freehold land and there is no easy access to the areas, they do not secure practical access to the Maruia River. The areas, which consist of grazed pasture, are unlikely to hold recreation values that warrant retention as public conservation land. The modified nature of the pastoral components of this stewardship area (e.g. dominated by pasture and riparian willow) justifies referring this area to the Department to investigate the suitability of disposal.

### Climate Change and Natural Hazards (Allowed)

- A submitter recommended GPR (river floodplain), noting that there are “opportunities for ecosystem restoration in response to flood events or coastal erosion; opportunities for carbon sequestration”.
- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.
- It was noted that disposal will not assist with a reduction in emissions from agriculture.

I recommend these comments are not accepted. The modified nature of the area (dominated by pasture and riparian willow) and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Ecology and Landscape (Allowed)

- Submitters in opposition to disposal advocated for the area to be retained, highlighting that braided rivers are acutely threatened and provide habitat for various bird species, and that the areas “cover or adjoin reaches of the Maruia Valley that are important for the habitat for dwarf galaxis”. It was argued that disposal would “reduce the beauty and habitat or potential habitat”. Local purpose (river conservation for ecological reasons) reserve was



suggested, while another submitter proposed GPR (river floodplain), noting there are “good opportunities for restoration of depleted indigenous ecosystems”.

- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.
- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are not accepted. The modified nature of the area (dominated by pasture and riparian willow) and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for restoration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the block’s cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and any potential disposal of relevant land arising from the Departmental investigation will be subject to the rights of first refusal process as set out in the Ngāi Tahu Claims Settlement Act 1998. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- Disposal was opposed due to “concern that change in status or disposal will affect the existing uses. Two grazing licences are in place - one for 5.5 ha and the other for 8.5 ha of Maruia River riverbed”.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.

- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.
- A submitter stated “The National Panel is recommending 65 hectares for disposal, but has recommended up to an additional 1000 hectares of land may be disposed of where there is pastoral land alongside river conservation areas (subject to survey). This is not explained or justified”.
- A submitter advocated for the proposed classification to be revised, stating that “conservation values alone must determine recommended classifications, and recreation and use values are not conservation values”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend these comments are not accepted. The highly modified nature of the area (dominated by pasture and riparian willow) and its landscape context (surrounded by freehold land) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## INA\_54 – SH7 - Springs Junction – 2807485

Protected Area	Recommendation ID	National Panel Recommendation	Mana Whenua Panel Recommendation	Support	Oppose
SH7 - Springs Junction	INA_54_2807485c	Disposal	Disposal	8	26

### DOC Conservation Values Report Description

A 0.3264-ha urban parcel containing mainly pasture/lawn, with some exotic treeland gravelled yard for parking. It has a watercourse (drain) running through it which is mainly on the eastern boundary. The land includes the WestReef Services yard. Springs Junction Recreation Reserve, vested in the district council, is immediately to the northwest.

### Panel Recommendations

National Panel: Disposal, as this area is a small, highly developed urban section within the township of Springs Junction and there are no known values that warrant ongoing management.

Mana Whenua Panel: Disposal, as the conservation areas are modified and should not form part of public conservation land.

### S.49(2)(d) Recommendation

- Proceed with the notified proposal, referring this area to the Department to investigate the suitability of disposal.

Summary of accepted submissions: Those submissions accepted as holding merit supported the proposed disposal investigation where there are no conservation values remaining. Also accepted were comments noting that this outcome is supported by the Mana Whenua Panel and reflects the perspectives of Ngāi Tahu.

Section 4 and Treaty principles: The Mana Whenua Panel have supported the proposed disposal investigation, supported by submissions from Treaty partner organisations, on the grounds that the areas are modified.

The Mana Whenua Panel have signalled specific Ngāi Tahu interests associated with this stewardship area, particularly that the area is in the vicinity to Ngāi Tahu forestry, and Ngāi Tahu may have future aspirations for the land. Given the Mana Whenua Panel support for the notified disposal investigation, I consider this is not inconsistent with the identified interests.

Rationale: My assessment is that the stewardship area is of low conservation value and warrants further investigation as to the suitability of disposal.

## Disposal - INA\_54\_2807485c

### Support

#### Ecology and Landscape (Allowed)

- Submissions stated they support disposal of stewardship land where there are no conservation values remaining, or agreed that the land did not hold any conservation values and was therefore suitable for disposal.

I recommend that these comments are accepted. The stewardship areas recommended for disposal are modified (urban parcel containing mainly pasture/lawn). I agree that the low conservation values warrant referring these areas to the Department for a disposal investigation. I note that any parts of the area identified to have substantive natural values are unlikely to pass the Conservation General Policy and legislative disposal tests.

#### Treaty Considerations (Allowed)

- Submissions supported the recommendations of the Mana Whenua Panel on the basis that these recommendations recognise Ngāi Tahu's connection to their ancestral lands and reflect their rights and interests, and fulfil obligations under the Treaty of Waitangi.



I recommend that these comments are accepted. I agree that the modified nature of the area (urban parcel containing mainly pasture/lawn) justifies referring this area to the Department to investigate the suitability of disposal. I note that the Mana Whenua Panel have supported the proposed disposal investigation, and I therefore consider that this is not inconsistent with the identified interests.

### General (Allowed)

- Submissions expressed general support for disposal without providing further justification.

I recommend that these comments are accepted. However, because no further justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised, these submission points do not raise any matters.

### Other (Not Allowed)

- A submitter recommended an on-site assessment to ensure any associated conservation values were protected.
- It was suggested that a land swap would be preferable.
- It was noted that disposals only form 0.01% of the stewardship land in the West Coast reclassification process.

As I have recommended these comments are not allowed, I recommend they are not accepted.

## Oppose

### Access and Recreation (Allowed)

- Submissions objected to disposal on the grounds that this represents a loss of public access and ability for future generations to enjoy these areas, expressed opposition to any disposal which means a loss of recreation opportunities such as angling or hunting, or requested that “appropriate mechanisms are used to ensure existing and future public use is maintained or improved”.

I recommend these comments are not accepted. My assessment is that the area, which is a small urban parcel, does not currently hold recreational values which justify retention as public conservation land.

### Climate Change and Natural Hazards (Allowed)

- Submissions opposed the recommendation on the grounds that all public conservation land, even if modified/pasture, offers potential for climate change mitigation and adaption (e.g. “areas are so important for communities that they need to be kept by DOC for climate mitigation, not disposed of”).
- Submissions argued that disposal compromises future sustainability and climate mitigation options (e.g. opportunities for restoration and carbon sequestration as well as for flood/erosion buffering, or allowing room for natural river processes).
- A submitter noted that “In almost all cases these areas have historically been part of the riverbed, and the rivers need this buffer to be able to move around without causing damage to infrastructure and farming assets. As a corollary to that, the freeholding of land adjacent to riverbeds often results in additional rock protection work which constrains the river, and the natural processes at play. This often results in unintended consequences (often erosion at other sites)”.
- A submission suggested alternative classification options such as “Scenic Reserve or Ecological Reserve” instead.

I recommend these comments are not accepted. The very small size and highly modified nature of the area (mainly pasture/lawn), and its landscape context (urban parcel) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Ecology and Landscape (Allowed)

- Submissions expressed opposition to any disposal of stewardship land on the grounds that there are likely to be natural values remaining, that even modified areas are likely to contain some indigenous species (juncus, carex, etc), that areas near forests could easily revert to a natural state, or that even highly modified land holds

opportunities for ecosystem regeneration and restoration (e.g. “disposal will lose the opportunity for regeneration and restoration”). A “precautionary policy” was recommended to hold conservation future options open.

- A submission recommended that waterways and wetlands would be better protected if adjacent land was retained, grazing excluded, and restoration/natural succession allowed to occur.
- Submissions opposed disposal of land by rivers on the grounds that so little remains in public conservation land (e.g. “poor ecological representation in existing protected areas”).
- Submissions raised concerns that disposing of stewardship land would then allow extractive activities which have a negative impact on natural values.

I recommend these comments are not accepted. The very small size and highly modified nature of the area (mainly pasture/lawn) and its landscape context (urban parcel) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

### Treaty Considerations (Allowed)

- One submission stated no stewardship land should be disposed of, except to tangata whenua, “and only then with the need to maintain the blocks cultural, conservation & mahika-kai values”.

I recommend that these comments are not accepted. I note that the Mana Whenua Panel has supported the proposed disposal investigation, and therefore consider this is not inconsistent with the identified interests. The highly modified area is unlikely to hold substantive “conservation & mahika-kai values”.

- A submitter stated, “transfer ownership to local iwi”.

I recommend this comment is not accepted. The proposed disposal investigation was supported by the Mana Whenua Panel, and I therefore consider that this is not inconsistent with the identified interests.

### General (Allowed)

- Submissions expressed opposition to disposal of any stewardship land in general terms, argued that public conservation land is best retained for future generations or future conservation purposes, expressed a desire for maximum environmental protection, or supported “a cautionary approach” and preference to retain land in Crown ownership.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

### Permissions, Economic Factors and Land Use (Not Allowed)

- A submitter opposed disposal based on concern that this would affect the existing uses.
- Submissions recommended consideration of potential productivity and whether the land could be used to support future food security.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### Process and Consultation (Not Allowed)

- Discussion with the land occupier and access users was recommended.
- Submissions opposed the recommendation based on concerns about the process used to reclassify stewardship land limitations of the consultation, including the scale of research required for the quantity of land notified.
- It was noted that “proposed disposals do not give even a general indication where disposal boundaries might be”, making it difficult for submitters to comment.
- It was suggested that there should be less focus on present values and more weight given to potential conservation value (as per the Conservation General Policy 6(c) and the Conservation Act requirement to safeguard options for future generations). It was recommended that the reclassification framework should include a “future conservation use” designation to hold land for future conservation requirements.

- It was noted that “there is no requirement” that land with low conservation values is disposed of, expressing opposition to any disposal of riverbed or pastoral land in public ownership.
- A submitter stated “The National Panel is recommending 65 hectares for disposal, but has recommended up to an additional 1000 hectares of land may be disposed of where there is pastoral land alongside river conservation areas (subject to survey). This is not explained or justified”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

#### Other (Not Allowed)

- Disposals were opposed unless the area is “completely modified and can be permanently and securely fenced off from any water ways and wetlands, and secure and enduring public access is provided for”.

As I have recommended these comments are not allowed, I recommend they are not accepted.

### No Opinion/Position Stated

#### Climate Change and Natural Hazards (Allowed)

- A submitter stated that no land should be disposed of if there is potential for restoration or carbon sequestration, and that riverbeds and adjacent land should be retained for flood retention, with no grazing permitted.

I recommend these comments are not accepted. The small size and highly modified nature of the area (mainly pasture/lawn) and its landscape context (urban parcel) limit the appropriateness and effectiveness of retaining it for ecosystem restoration and carbon sequestration. I note that any potential disposal arising from the Departmental investigation will trigger the formation of marginal strips for qualifying waterbodies, which will be retained and protected as public conservation land.

#### General (Allowed)

- Submissions advocated generally for all national parks, forest parks, scenic reserves and stewardship land to be protected from development.

I recommend that these comments are not accepted. Insufficient justification is provided regarding the natural and historic resources of the specific stewardship area, and no new material is raised.

#### Other (Not Allowed)

- One submission noted that disposal of land will be subject to Heritage New Zealand Pouhere Taonga Notification Process for Disposal of Crown-owned Land.
- One submission suggested any funds from land sold should go to the Nature Heritage Fund.

As I have recommended these comments are not allowed, I recommend they are not accepted.