

Submission Form

Draft Aoraki/Mount Cook National Park Management Plan



Once you have completed this form

Send by post to: Aoraki/Mount Cook NPMP Submissions, Department of Conservation, Private Bag 4715, Christchurch Mail Centre, Christchurch 8140 or email to: aorakinp@doc.govt.nz

Submissions must be received no later than 4.00 pm, Monday 4th February 2019

Anyone may make a submission, either as an individual or on behalf of an organisation. Please ensure all sections of this form are completed. You may either use this form or prepare your own but if preparing your own please use the same headings as used in this form. A Word version of this form is available on the Department's website: www.doc.govt.nz/aoraki-mt-cook-plan-review

Submitter details:

Name of submitter or contact person:	Andrew Leslie
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Email:	
<input type="checkbox"/> I wish to be heard in support of my submission (this means you can speak at a hearing)	
<input checked="" type="checkbox"/> I do not wish to be heard in support of my submission <i>(tick one box)</i>	
Signature: Andrew Leslie	

Your submission is submitted as part of a public process and once received by the Department it is subject to the provisions of the Privacy Act 1993 and the Official Information Act 1981. The Department may post your submission on its website and also make it available to departmental staff, any consultant used, the relevant Conservation Board and the New Zealand Conservation Authority. Your submission may be made available to any member of the public following a request made under the Official Information Act 1981.

Submission:¹

Introduction

1. The New Zealand Recreation Association (Recreation Aotearoa) is a registered charity and the organisation responsible for providing leadership, advocacy and professional development opportunities for those involved in the broader recreation sector. We work at an agency, industry and professional level to build capability, develop partnerships, and equip individuals and organisations with the skills they need to deliver high quality recreation experiences that engage participants.
2. The New Zealand Recreation Association's membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, outdoor recreation businesses, and others involved in the delivery of recreation throughout New Zealand.
3. Our role is to champion high-quality recreation for the benefit of New Zealand.
4. Our vision is that by 2020 New Zealand will have a strong recreation industry that meets the needs of current and future participants, so that through recreation, New Zealanders are active, healthy, and connected
5. The New Zealand Recreation Association believes recreation is vital to New Zealand society. Recreation is not just about enjoyment, it is about being healthy, engaged, stimulated, and interacting with others, and this occurs via outdoor recreation, community recreation, parks, and aquatic and facility-based recreation centres.
6. Recreation is a major contributor to the physical and mental health of individuals, and to the resilience of our communities. 90 per cent of New Zealanders believe that by being active they are in turn maintaining a good level of health and fitness, and this helps to relieve stress.
7. A thriving recreation industry can also help our nation prosper socially and economically. Sport and active recreation contributes \$4.9 billion or 2.3% to our annual GDP, and the sector employs more than 53,000 New Zealanders. The nation's recreation values and opportunities are fundamental to the nation's tourism industry. Approximately 50% of international visitors to New Zealand participate in one form of outdoor recreation or another.
8. Recreation is part of what it is to be a New Zealander. Many of us are members of clubs and groups that enjoy recreation for fun, health and social reasons. 84% of New Zealanders believe sport and physical activity bring people together and create a sense of belonging.
9. For individuals, recreation contributes to physical and mental wellbeing and provides an opportunity to meet new people. People define themselves and their communities through their recreation opportunities. Recreation fosters community cohesion and resilience and supports the integration of social groups such as diverse ethnic groups.

¹ Further information can be appended to your submission. If you are sending this submission electronically we accept the following formats – Microsoft Word, Text, PDF and JPG. The file must not be more than 30 MB – please send large attachments separately or contact orakinp@doc.govt.nz to arrange for delivery of large electronic files.

74% of New Zealanders agree that sport and physical activity help build vibrant and stimulating communities.

10. Investment in recreation generates tourism opportunities and supports regional development by encouraging skilled professionals and migrants to consider business options in and beyond the main centres.
11. Research shows that recreation makes a significant contribution to social resilience. It allows individuals to thrive, and to connect with each other. This, in turn, makes communities stronger. A society in which people are active and healthy is also more economically sound.
12. Physical inactivity is associated with loss of productivity, health costs, as well as associated costs such as pain and suffering. Healthier, happier individuals are more likely to do well in other areas of their lives, whether it is in social or professional situations. This has a positive flow-on effect for communities and society as a whole.
13. Greater understanding of these benefits and their downstream impacts, along with awareness of how laws and regulations can influence recreation delivery, are key to ensuring that New Zealand's recreation opportunities remain among the world's best.

General Comments:

14. We acknowledge and thank the Department of Conservation (DoC) as a huge investor and delivery body of recreational opportunities in the Mackenzie Region and more widely across New Zealand.
15. The NZ Recreation Association submits that the presentation of the Draft Plan, associated maps & papers and the process in general, do not make it easy to understand the extent of proposed changes, relative to the previous National Park Management Plan. It requires considerable previous knowledge, access to the previous Plan and a great deal of time to determine how the status quo will be altered by the proposals in the Draft. We respectfully suggest that this be considered in future Departmental planning processes.
16. The NZ Recreation Association submits that many of the maps contained in the Draft were of insufficient resolution and detail for stakeholders to easily interpret. We acknowledge that later in the process, more detailed Maps were provided online. We also acknowledge that the interactive map is an excellent tool and encourage the Department to utilise it in future planning processes.
17. The NZ Recreation Association submits that there is inadequate reference to the National Parks Act (1980) in the Draft Plan. The National Parks Act is only briefly mentioned with regards to the purpose of National Parks (Pg 14), namely 4.1 which is concerned with 'Preservation'. But even that section does not include the crucial title "Parks to be maintained in natural state, and public to have right of entry. We submit that the tone of the Plan would be strengthened and better balanced by the inclusion of parts of the following Section (2) which includes such language as "they shall be preserved as far as possible in their natural state" and "the public shall have freedom of entry and access to the

parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived.”

18. The NZ Recreation Association submits that there is inadequate reference to the Conservation Act (1987) in the Draft Plan. We submit that the tone of the Plan would be strengthened and better balanced by reference to and inclusion of parts of the Conservation Act. Specifically, Section 6 ‘Functions of the Department’. We note that 6(e) of the Act states “to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism.” We hold the view that this establishes a hierarchy in which Recreation sits above Tourism with regards to the priorities of the Department and the Management of Public Conservation Land. We note that the word ‘foster’ is far more proactive than ‘allow’.
19. The previous two points (17 & 18) derive from the broader NZ Recreation Association view that the Draft Plan is heavily skewed towards catering to and managing the flow of International Tourists in and around the National Park. The NZ Recreation Association respectfully submits that the interests of the New Zealand Recreation Community have been diminished throughout the Draft Plan in what appears to be over-catering to the interests of the Tourism Industry. We submit that it is not the role of the Department to meet the demand of International Tourism, but rather supply opportunities for International Tourism only in accordance with The Conservation Act (1987), The National Parks Act (1980) and the General Policy for National Parks (2005).
20. The NZ Recreation Association commends the comprehensive integration of Te Tiriti within the Draft Plan with respect to how the principles of partnership, protection, and participation are achieved in the management of Westland/Tai Poutini. NZRA similarly champions a commitment to Te Tiriti principles as the basis for governance and management in our sector. We applaud the extent to which these principles follow through in the Draft Plan. It shows an appreciation of why a Te Tiriti partnership between Tangata Whenua and Tangata Tiriti is important to how and what will be achieved.
21. In contrast, it is the view of the NZ Recreation Association that the Draft Plan does not make adequate reference to the role and impact of Recreation on the history and development of the area which ultimately became the Westland Tai Poutini National Park. This includes, but is not limited to, guided mountaineering, private mountaineering, exploration, hunting, rock climbing and tramping. As a result, the importance of the whenua from a Tangata Tiriti perspective is somewhat diminished.
22. The NZ Recreation Association submits that there is a lack of ambition and specifics with regards to Recreational outcomes in the Draft Plan. Whilst not legally operative, the Milestones in a National Park Management Plan are perceived as important and concrete commitments by the Department to the recreational community. The NZ Recreation Association submits that the Department should utilise the Milestones to signal its enthusiasm for fostering Recreation on Public Conservation Land.
23. The NZ Recreation Association submits that the Draft Plan is generally flawed by a reluctance to commit to concrete outcomes, especially in the realm of recreational assets, such as huts and

- tracks. These assets typically last much longer than the life of the Management Plan. Investment in recreational assets, their location, their type and their potential are all matters that the public should have a say in. The NZ Recreation Association submits that contrary to the opinion of many Departmental staff members, these opportunities are not operational matters. They should be developed prior to the formulation of the Draft Plan and subject to a full and considered public consultation process.
24. The NZ Recreation Association does not support the inclusion of broad landing zones as detailed in the Draft Plan. The vast size of the proposed zones is a huge and uncalled for change from the previous plan. The NZ Recreation Association is sympathetic to the rationale that landing sites could be expanded slightly for safety reasons, this could be achieved without allowing free-range pilot discretion over vast tracts of the National Park.
 25. The NZ Recreation Association does not support the notion of all Aircraft Landings being treated equally. While the noise and tranquillity effect may be similar, the intent of aircraft landing can be very different. For example, a flight that delivers mountaineers to a high alpine hut for the purpose of mountaineering should be treated very differently to a scenic snow landing. The first is a form of recreation, which the department must foster. The second is a form of tourism, which the department must only allow.
 26. The NZ Recreation Association does not support what appears to be a proposed increase in Aircraft Landings in the National Park. In addition, the NZ Recreation Association submits that there should be both daily and annual limits for Aircraft Landings. The NZ Recreation Association notes the irony of visitors utilising carbon intensive helicopter access to view glaciers that are rapidly diminishing due to climate change.
 27. The NZ Recreation Association has concerns about the relationship between the Visitor Management Zones, and Aircraft Landing Zones. It appears that several Visitor Management Zones have been significantly altered from the previous plan, although this not be apparent to a casual reader (see point 15). It also appears that the new Visitor Management Zones are misaligned with the Aircraft Landing Zones
 28. The NZ Recreation Association has concerns about the Tranquillity Mapping Tool (TMT) and the desired Tranquillity Outcomes described in the Draft Plan. The NZ Recreation Association submits that if the Visitor Management Zones are set correctly and if Aircraft Landing Sites are established in accordance with those settings, the TMT will be best utilised as a monitoring methodology. The NZ Recreation Association submits that while the TMT is in its infancy, it should not be utilised to formulate parameters within the Plan, but rather to assess the effectiveness of the plan and drive improvements as necessary.
 29. The NZ Recreation Association submits that there is a general lack of reference and regard of the importance of Outdoor Education throughout the Draft Plan. The Aoraki Mount Cook National Park is ideally placed to provide unique and stimulating learning experiences, self-directed learning opportunities, and outdoor pursuits for school-aged children. For many New Zealanders, a school field-trip or camp is the first time they visit a National Park.
 30. The NZ Recreation Association submits that the Plan should make explicit reference to the opportunities and benefits of Outdoor Education, as well as making commitments

supported by the Department. The NZ Recreation Association notes that Aoraki Mount Cook National Park has a paid Learning Experiences Outside the Classroom (LEOTC) Coordinator that facilitates between 1,500 – 2,600 student visits per year. NZRA submits that this should be celebrated and enshrined in the National Park Management Plan.

Section: <i>Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</i>	Submission: <i>Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</i>	Decision sought: <i>State clearly the decision sought or changes you would like to see. Please be as precise as possible. For example:</i> <ul style="list-style-type: none"> - <i>if supporting: 'retain Policy X'</i> - <i>if opposing: 'delete Policy X'</i> - <i>if seeking changes 'reword Policy X to read (give suggested wording)</i>
1.2.2 Table 1	Support	We support the inclusion of the various huts and memorials associated with recreational pursuits and appreciates their recognition as historically significant. We thank the department for their efforts to actively conserve these Taonga.
1.2.3 Recreational values VMZ's	Comment. See general comment 27.	We support in principle the concept and use of Visitor Management Zones (VMZ). However, the VMZ's as described in the Draft Plan seems to exhibit inconsistencies and misalignment with the Aircraft Landing Zones and the Desired Tranquillity outcomes.
1.2.3 Soundscape and tranquillity	Comment. See general comment 28.	We support in principle the concept and use of the Tranquillity Mapping Tool, but only as a method to monitor and drive enforcement of established Visitor Management settings.
1.2.3 Objectives and policies	Support with revision. We submit that the Objectives and Policies within 1.2.3 lack ambition and detail on what recreational infrastructure, such as huts and tracks, will be provided.	The Objectives and Policies within 1.2.3 should contain concrete and measurable commitments to the Recreational Community, specifically with regards to the provision of huts and tracks.
1.2.3 Milestones	Do not support We submit that the inclusion of only one single Milestone in this section is inconsistent with the Departments legal requirement to foster Recreation.	Whilst not legally operative, the Milestones in a National Park Management Plan are perceived as important and concrete commitments by the Department to the recreational community. We submit that the Department should utilise the Milestones section to signal its enthusiasm for fostering Recreation on Public Conservation Land.

1.2.4 Engagement Values	Support with revision See general comments 29 & 30.	We submit that this section should include reference and commitment to the Learning Experiences Outside the Classroom (LEOTC) programme that is currently in place at Aoraki Mount Cook National Park. We note that Aoraki Mount Cook National Park has a paid LEOTC Coordinator that facilitates between 1,500 – 2,600 student visits per year.
1.3.1 Policy 13a (iv)	Do not support	We submit that there does not need to be a policy of focusing on consolidating backcountry facilities. The rationale for doing so has not been presented. The word 'consolidation' should be replaced by 'maintenance'.
1.3.1 Policy 13a (vi)	Support with relocation within the plan	We submit that this sub-policy should be relocated into the 'Authorisations' section.
1.3.1 Policy 13b	Support	We submit that consultation with the Public is important and necessary.
1.3.1 Policy 13h (iv) iii	Support with revision	We submit that the word 'removal' should be replaced with 'relocate'.
1.3.1 Policy 14	Support	We support the retention of Club lodges and commends their existence as recreational assets.
1.3.1 Policy 16	Support with clarification	We submit that Caroline Hut needs to have credible public access that does not require the purchase of a guided trip or instruction in order to book a bed.
1.3.1 Policy 19b	Do not support.	We submit that there does not need to be a policy that would allow the management of a DoC Camping ground to be outsourced to a concessionaire. The rationale for doing so has not been presented.

<p>1.3.3 Aircraft Landing Zones</p>	<p>Do not support See general comments 24 &25</p>	<p>We do not support the inclusion of broad landing zones as detailed in the Draft Plan.</p> <p>We do not support the notion of all Aircraft Landings being treated equally.</p>
<p>1.3.5 Bolts and Fixed Anchors</p>	<p>Comment</p>	<p>We submit that Departmental Policy on bolts and fixed anchors, should be consistent and aligned across all National Park Management Plans and Conservation Management Strategies. Recent revisions of the Paparoa National Park Management Plan and the Wellington Conservation Management Strategy settled on a broadly acceptable policy for bolting and fixed anchors.</p>
<p>1.3.5 Policy 3(a)</p>	<p>Do not support</p>	<p>The requirement to consult with the Canterbury Aoraki Conservation Board would be an onerous and time-consuming burden on the Board. The requirement is also likely to be ignored by private individuals engaged in recreational activities requiring bolts and/or fixed anchors.</p>
<p>1.3.5 Policy 5</p>	<p>Do not support</p>	<p>We submit that this policy should read “Encourage and support NZAC to take the lead on bolts and fixed anchor guidance.”</p>
<p>1.3.6 Policy 4 & 5</p>	<p>Comment</p>	<p>We applaud the Departments efforts to foster competitive sporting events.</p> <p>We note the rise in popularity, across New Zealand, of ‘pay-to-play’ recreational events and the role they play in positive mental and physical health outcomes.</p>
<p>1.3.10 Policy 1(c)</p>	<p>Do not support</p>	<p>We submit that it may be perfectly feasible and justified for some types of concessionaires in some circumstances, to have more than one guided group per day. There are other methods to mitigate over-commercialisation of National Parks. The rationale for adopting this policy has not been presented.</p>

2.1.1 Recreational Values	Support with revision	We submit that it would be appropriate to include a description or list of the various recreational pursuits available in this place. This would include, but not be limited to, Walking, Rock Climbing, Bouldering, bird-watching and photography.
2.1.3 Policy 12	Support	We support the establishment of cycle trails.
2.2.1 Recreation Values	Comment	We submit that the extent to which Caroline Hut is currently bookable and available to the public is disputable, or at least unclear, to the general public.
2.2.1 Recreation Values	Support with addition	We submit that the list of huts within this place should include Hooker Hut, which has only been temporarily removed from the Hooker Valley, with Departmental commitment to returning it.
2.2.2 Waste Management	Support	We support the implementation of the pack-out approach to human waste and encourage the Department to work closely with stakeholders to bring about the operational and social changes required for the approach.
2.2.3 Policy 3	Support	We support the provision of new day and overnight walking facilities.
2.2.3 Policy 4	Support with revision	We submit that the use of the term 'precautionary approach' is redundant as it is encapsulated by and inherent in the NZAC guidance documents on bolting and fixed anchors.
2.2.3 Milestone 1	Comment	We submit that this Milestone indicates that the Department has a pre-determined plan for the location of Hooker Hut. NZRA notes that this has not been subject to Public, Iwi or Conservation Board consultation.

<p>2.3.1 Recreational Values</p>	<p>Comment</p>	<p>We submit that the inclusion of scenic flight and landings as a form of recreation does not reflect the Departments legislative underpinnings which clearly differentiates between recreation and tourism. Scenic snow landings are clearly a tourist activity which should only be allowed in National Park after the requirement to foster recreation has been satisfied. On the surface, this may appear to be a minor mistake, but we submit that it is an exemplar of a wider undesirable bias and misalignment of interests that prevail throughout the Draft Plan.</p>
<p>2.3.3</p>	<p>Comment</p>	<p>We note that there is no reference made to the provision, maintenance or refurbishment of the Tasman Saddle or Kelman Huts, which are highly valued recreational assets. We also note that there is minimal reference to the proposed NZAC mid-Tasman Hut, likely to be located in the Beetham Valley.</p>
<p>2.3.3 Policy 7(c)</p>	<p>Do not support</p>	<p>We do not support the establishment of a Tasman Lake landing zone. Such a zone would clearly only be utilised in the provision of a tourism product.</p>
<p>2.4.2 Recreational values</p>	<p>Support with relocation within the plan.</p>	<p>We submit that “investigating options to re-establish a hut in the upper Murchison Glacier area” should appear in the Milestone section of this chapter.</p>
<p>2.4.3 Policies (Guiding and Aircraft)</p>	<p>Does not support</p>	<p>We submit, that taken as a whole, these policies represent a significant shift towards catering to the commercial tourism industry, specifically heli-skiing, heli-hiking and scenic snow landings. We do not support the proposed combination of landing zones, landings per day and clients per concessionaire.</p>

<p>2.4.3 Milestones</p>	<p>Do not support</p> <p>We submit that the inclusion of only one single Milestone in this section is inconsistent with the Departments legal requirement to foster Recreation.</p>	<p>Whilst not legally operative, the Milestones in a National Park Management Plan are perceived as important and concrete commitments by the Department to the recreational community. We submit that the Department should utilise the Milestones section to signal its enthusiasm for fostering Recreation on Public Conservation Land.</p>
<p>2.5</p>	<p>Support</p>	<p>We support the management of this place as a remote recreational zone, free from aircraft landings.</p>