

# Submission Form

## Draft Westland Tai Poutini National Park Management Plan



### Once you have completed this form

Send by post to: Westland/Tai Poutini NPMP Submissions, Department of Conservation, Private Bag 4715, Christchurch Mail Centre, Christchurch 8140 or email to: [westlandnp@doc.govt.nz](mailto:westlandnp@doc.govt.nz)

### Submissions must be received no later than 4.00 pm, Monday 4<sup>th</sup> 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/westland-review](http://www.doc.govt.nz/westland-review)

#### Submitter details:

Name of submitter or contact person:	Sam Newton
Organisation name: <i>(if on behalf of an organisation)</i>	New Zealand Recreation Association
Postal address:	PO Box 11132, Manners Street, Wellington 6142
Telephone number: <i>(the best number to contact you on)</i>	027 723 9380
Email:	sam@nzrecreation.org.nz
<input checked="" type="checkbox"/> I wish to be heard in support of my submission (this means you can speak at a hearing)	
<input type="checkbox"/> I do not wish to be heard in support of my submission <i>(tick one box)</i>	
Signature: Sam Newton	

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:**<sup>1</sup>

## **Introduction**

1. The New Zealand Recreation (NZRA) 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.

---

<sup>1</sup> 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 30MB.

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 Westland Region and more widely across New Zealand.
15. NZRA 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 the 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. NZRA 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. NZRA 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". NZRA submits 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. NZRA 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’. NZRA notes 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.” NZRA holds 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 NZRA view that the Draft Plan is heavily skewed towards catering to and managing the flow of International Tourists in and around the National Park. NZRA 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. NZRA 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 NZRA 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, an acknowledgement of the importance of the whenua from a Tangata Tiriti perspective is somewhat diminished.
22. NZRA submits that the content of the ‘Future Recreational Opportunities’ supporting paper, should have been incorporated into the Draft Plan and given effect in the Outcomes, Policies and Milestones sections. Many of the ideas and suggestions in that paper are commendable and worthy of departmental commitment and investment. NZRA submits that, contrary to the opinion of many Departmental staff members, these opportunities are not operational matters. These recreational opportunities should be developed prior to the formulation of the Draft Plan and subject to a full and considered public consultation process.

23. Relatedly, NZRA submits that there is a lack of ambition and specifics regarding 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. NZRA submits that the Department should utilise the Milestones to signal its enthusiasm for fostering Recreation on Public Conservation Land.
24. NZRA 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. NZRA 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.
25. NZRA 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 closely aligned with the Aircraft Landing Zones. NZRA submits that Visitor Management Zones should not be formulated on the basis of aircraft accessibility or the desires of the Tourism industry.
26. NZRA 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 (see point 18).
27. NZRA 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. NZRA 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.
28. NZRA does not support what appears to be a proposed increase in Aircraft Landings in the National Park. In addition, NZRA submits that there should be both daily and annual limits for Aircraft Landings.
29. NZRA has concerns about the Tranquillity Mapping Tool (TMT) and the desired Tranquillity Outcomes described in the Draft Plan. NZRA 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. NZRA submits that while the TMT is in its infancy, it should not be utilised to formulate parameters within the Draft Plan, but rather to assess the effectiveness of the plan and drive improvements as necessary.

30. NZRA submits that the proposed amenities area discussed from page 122 in the Draft Plan should be excluded from the current Management Plan revision and considered in a mid-cycle Management Plan amendment process. The scale, impact, longevity and novelty of the proposal is such that is inappropriate to consider it alongside the rest of the Draft Plan. NZRA submits that considering it as an amendment to the Management Plan at a future time will allow all stakeholders to contribute to the decision more fully.
  
31. NZRA submits that there is a general lack of reference and regard of the importance of Outdoor Education throughout the Draft Plan. The Westland Tai Poutini 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. NZRA submits that the Plan should make explicit reference to the opportunities and benefits of Outdoor Education, as well as making commitments as to how it would be supported by the Department. NZRA notes that the adjoining 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.

<b>Section:</b> <i>Identify the section, objective, outcome, policy, milestone, table or map that your submission relates to.</i>	<b>Submission:</b> <i>Explain the nature of your submission stating whether you support or oppose the approach in the draft Plan. Please provide brief reasons.</i>	<b>Decision sought:</b> <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"> <li>- <i>if supporting: 'retain Policy X'</i></li> <li>- <i>if opposing: 'delete Policy X'</i></li> <li>- <i>if seeking changes 'reword Policy X to read (give suggested wording)</i></li> </ul>
1.4, 1.5 & 1.6	Support with revision	NZRA submits that there is inadequate reference to and explanation of, the Recreational History of the National Park. Recreation has been the principal driver of both the development and preservation of the National Park. This should be clearly acknowledged in a more balanced account of its history.
2.3. Table 1. Page 50	Support	NZRA supports the inclusion of the various huts, tracks and bridges associated with recreational pursuits and appreciates their recognition as historically significant. We thank the department for their efforts to actively conserve these Taonga.
Map 5. Page 59.	Refer to General Comments. NZRA, in principle, supports the intent of tranquillity zones and the mapping tool by which they will be monitored. However, we have concerns that the desired tranquillity outcomes are not aligned with the Visitor Management Zones. We are also concerned that the desired tranquillity outcomes have been influenced by the proposed Aircraft Landing Zones detailed elsewhere in the plan.	The Tranquillity Mapping Tool has huge potential to improve recreational outcomes in National Parks, but its use needs to be better thought through. If the Tranquillity zones are not made operative by way of inclusion in the Objectives or Policies, then it may be the case that they should not appear in the Management Plan at all. The TMT may be of more use as an operational tool by the Department for the purposes of monitoring.
2.4.1 Objectives and Policies	Refer to General Comments. NZRA submits that the Objectives and Policies within 2.4.1 lack ambition and detail on what recreational infrastructure, such as huts and tracks, will be provided.	The Objectives and Policies within 2.4.1 should contain concrete and measurable commitments to the Recreational Community, specifically with regards to the provision of huts and tracks.
2.4.1 Policy 3(a)	Support	NZRA commends the efforts by the Department to engage in integrated or 'joined-up' planning with other agencies. This could be extended to include LINZ and NZTA in some circumstances.

2.4.1 Policy 3(b)	Support with amendment	Recreational groups should be extended to include the New Zealand Recreation Association (NZRA) and White Water New Zealand (WWNZ).
2.4.1 Policy 7	Support	NZRA commends the efforts to engage in planning and operations that recognises the fact that the National Park borders the Aoraki Mount Cook National Park.
2.4.1 Milestones	NZRA submits that the milestones do not adequately cater to the most popular forms of recreation in the National Park i.e Tramping, Hunting and Climbing. There are no explicit commitments to those communities that the provision of recreational infrastructure will be maintained or improved.	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. NZRA submits that there should be less use of words such as 'reviewed', 'reported' and 'monitored'. We submit that there should be more milestones that include more concrete verbs such as 'built', 'implemented' and 'provided'.
2.4.1 Milestone 1	Do not support timeframe	NZRA submits that this milestone is required to be delivered more urgently than 5 years.
2.4.1 Milestone 6	Support	NZRA supports the implementation of the pack-out approach to human waste and encourage the Department to work closely with NZAC to bring about the operational and social changes required for the approach.
2.4.1 Milestone 13	Do not support. See General Comments	NZRA submits that the review of activity, visitor experience and tranquillity levels should be done annually, as it is monitored. There should be explicit provisions to reduce landing sites and opportunities, as a result.



2.5 Community Engagement	Support with amendment	NZRA would like to be included in the list of charitable organisations that have an interest in the general wellbeing and protection of the National Park. We also submit that the list should also include the Backcountry Trust and Permolat, in recognition of the role that they play in the provision and maintenance of huts and tracks.
2.5 Policies	Support with amendment. There is inadequate reference to Outdoor Education.	NZRA submits that there should be explicit reference made to working with Outdoor Education providers and the provision of an LEOTC Coordinator.
2.5 Milestones	Support with addition.	NZRA submits that a Milestone should be included that requires the Department to engage with and support the Backcountry Trust and/or Permolat in their efforts to maintain recreational assets such as huts and tracks in the National Park.
3.1 Policy 5	Support with relocation within the Plan	This Policy should appear as a Policy or Milestone in Section 2.4
3.1 Policy 6	Support	NZRA supports the implementation of the pack-out approach to human waste and encourage the Department to work closely with NZAC to bring about the operational and social changes required for the approach.
3.1 Policy 13	Support	NZRA submits that the removal of refuse and solid human waste by concessionaires will improve recreational outcomes.

3.1 Policy 16 (iv)	Do not support	NZRA does not support a focus on consolidating backcountry facilities. In many cases, they serve a vital role in visitor safety. In other cases, changes in recreational patterns can result in an underutilised facility undergoing a renaissance in popularity with a different recreational user group. These patterns are often longer than the life of a National Park Management Plan and/or the depreciation schedule of the facility.
3.1 Policy 16 a (vi)	Support with relocation within the Plan	NZRA submits that this policy should appear in 3.1 Policy 9. NZRA notes the irony of visitors utilising carbon intensive helicopter access to view glaciers that are rapidly diminishing due to climate change.
3.1 Policy 16 h (i)i	Support with amendment	NZRA submits that this policy should be amended to “is consistent with the outcomes of consultation with mana whenua and recreational user groups.”
3.1 Policy 16 h (i)iii	Support with amendment	NZRA submits that this policy should be amended to “huts are designed to facilitate easy relocation.”
3.2.2 Policies	See General Comments	NZRA has numerous and wide-ranging concerns with the Aircraft Landing Zones and the Tranquillity Mapping Tool throughout the Draft Plan.
3.2.2	Comment	NZRA submits that a policy should be included that seeks to bring about the carbon neutrality of aircraft concessionaires.
3.2.2 Policy 3(c)	Support	NZRA supports the use of comprehensive and universal data to drive monitoring, decision-making and enforcement.

3.2.2 Policy 5 (i)	Do not support	NZRA submits that this in an impractical and burdensome requirement that is likely to be ignored.
3.2.2 Policy 8 (a)	Do not support	NZRA does not support the inclusion of broad landing zones as detailed in the Draft Plan. Regardless, restricting landing sites for hang-gliders and para-gliders is impractical, potentially unsafe and likely to be ignored.
3.2.2 Policy 8 (b)	Do not support	NZRA submits that this in an impractical and burdensome requirement that is likely to be ignored.
3.2.3	Comment	NZRA notes that while dog-walking is a popular and worthwhile form of recreation, there are long-standing legal restrictions on the presence of dogs in National Parks. NZRA submits that any controlled recreational dog walking should be primarily informed by the Departmental Biodiversity Rangers, who are best placed to assess the impacts of any decision.
3.2.4	Comment	NZRA submits 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.
3.2.4 Policy 1	Support with revision.	NZRA submits that “Should take a precautionary approach...etc” is redundant, as the NZAC guidance documents cited later in the Policy already encapsulate a precautionary approach.

3.2.4 Policy 2 (a)	Do not support	The requirement to consult with the West Coast Tai Poutini 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.
3.2.4 Policy 4	Do not support.	NZRA submits that this policy is impractical, unnecessary and rendered redundant by other policies in this section.
3.2.6	Support	<p>NZRA applauds the Departments efforts to foster competitive sporting events in such pursuits as Adventure Racing, Multi Sport and Orienteering.</p> <p>NZRA notes the rise in popularity, across New Zealand, of 'pay-to-play' recreational activity and the role it plays in mental and physical health outcomes.</p>
3.2.7 Policy 4	Support	<p>NZRA applauds the Departments engagement with the West Coast Fish and Game Council.</p> <p>NZRA notes the popularity of freshwater fishing and game bird hunting in New Zealand and the positive roles those forms of recreation play in mental and physical outcomes.</p>
3.2.14	Comment	<p>NZRA submits that there is a problematic mis-definition of e-bikes and mountain bikes in this section.</p> <p>NZRA submits that it is widely accepted that an e-bike with less than 300 Watts or power can be regarded as a bicycle. An e-bike of more than 300 Watts of power can be regarded as a motor vehicle.</p>

3.2.15	Comment	<p>NZRA applauds the Departments efforts to foster Canoeing and Kayaking in Westland Tai Poutini National Park, notwithstanding the lack of Aircraft landing sites for whitewater kayaking in the Cook and Karangarua catchments.</p> <p>NZRA notes the popularity of Canoeing and Kayaking in New Zealand and the positive roles those forms of recreation play in mental and physical outcomes.</p>
3.2.16	Comment	<p>NZRA applauds the Departments efforts to foster Hunting in Westland Tai Poutini National Park.</p> <p>NZRA notes the popularity of Hunting in New Zealand and the positive roles those forms of recreation play in mental and physical outcomes.</p>
4.1.1 Recreational Values	Support with revision	<p>NZRA submits that this section should contain a more fulsome description of the varied forms of recreation that are undertaken in this place.</p>
4.1.2 Recreation Values	Support with relocation within the Plan	<p>NZRA submits that the three opportunities bullet-pointed in this section and the future mountain-biking opportunities should appear as a Policies or Milestones in 4.1.3</p>
4.1.3 Outcomes Recreation	Support with amendment	<p>NZRA submits that the range of recreational opportunities listed should include mountain biking and canoeing/kayaking.</p>
4.1.3 Policies	Support with revision	<p>NZRA submits that there is a general lack of ambition, clarity and concrete outcomes for the recreational community.</p> <p>NZRA submits that there should be less use of words such as 'consider', 'encourage' and 'support'. We submit that there should be more policies that include more concrete verbs such as 'built', 'implemented' and 'provided'.</p>

4.1.3 Milestones	Support with revision	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. NZRA submits that there should be less use of words such as 'investigated' and 'monitored'. We submit that there should be more milestones that include more concrete verbs such as 'built', 'implemented' and 'provided'.
4.1.3 Milestone 3	Support	NZRA commends the efforts by the Department to engage in integrated or 'joined-up' planning.
4.1.3 Milestone 8	Support	NZRA supports the opening of a walking track to Lake Gault.
4.1.3 Milestone 10	Support with revised timeframe	NZRA submits that the feasibility should be investigated by Year 2.
4.1.3 Milestone 11	Support with revised timeframes	NZRA submits that in light of highly dynamic visitor and recreational patterns, the evidence should be collated and analysed in Years 2, 5 and 8.
4.2.1 Recreation	Support with amendment	NZRA submits that the inclusion of scenic snow 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 a National Park after the requirement to foster recreation has been satisfied. On the surface, this may appear to be a minor mistake, but NZRA submits that it is an exemplar of a wider undesirable bias and misalignment of interests that prevail throughout the Draft Plan.

<p>4.2.1 Recreation</p>	<p>Comment</p>	<p>NZRA submits that this section does not make adequate reference to the role mountaineering has in this place and conversely, the role that this place has in mountaineering. NZRA respectfully suggests that the Department consult with NZAC to develop more textured and balanced wording that encapsulates the recreational value of mountaineering in this place.</p>
<p>4.2.2 New Recreation opportunities</p>	<p>Comment. See general comments.</p>	<p>NZRA submits that the new recreational opportunities outlined in the supporting paper, including the overnight opportunity on Mount Fox, should have been included in the actual Draft Plan and given effect in the Outcomes, Policies and Milestones. NZRA 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.</p>
<p>4.2.2 Aircraft</p>	<p>Do not support. See general comments.</p>	<p>NZRA does not support the inclusion of broad landing zones as detailed in the Draft Plan.</p>
<p>4.2.2 Aircraft</p>	<p>The addition of a Landing Site</p>	<p>NZRA supports the WWNZ proposal that a river-user only Landing Site at the terminal moraine of the La Perouse Glacier (altitude 820m).</p>

<p>4.2.3 Outcomes Recreation values</p>	<p>Support with amendment</p>	<p>NZRA submits that the inclusion of scenic snow 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 NZRA submits that it is an exemplar of a wider undesirable bias and misalignment of interests that prevail throughout the Draft Plan.</p>
<p>4.2.3 Policy 2</p>	<p>Do not support</p>	<p>NZRA submits that this policy as written does not adequately reflect the Departments legislative underpinnings which clearly differentiates between recreation and commerce (tourism). The Department is required to foster recreation, but only allow for tourism. This applies to the viewing of and access to glaciers.</p>
<p>4.2.3 Policies 3, 4 &amp; 5</p>	<p>Do not support. See general comments.</p>	<p>NZRA does not support the inclusion of broad landing zones as detailed in the Draft Plan.</p> <p>Notwithstanding that, NZRA submits that the daily landing allowances are too high and would impinge on recreational user groups in the Glaciers Place.</p> <p>NZRA submits that there should be annual, as well as daily, limits on aircraft landings.</p>
<p>4.2.3 Milestones</p>	<p>Comment</p>	<p>NZRA submits that 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.</p> <p>NZRA submits there is a general lack of ambition, clarity and concrete results for the recreational community in this section.</p>



4.2.3 Milestone 9	Support with revised timeframe	<p>NZRA submits that the feasibility of an overnight experience on Mount Fox should have been investigated prior to the development of the Draft Plan.</p> <p>In lieu of that outcome, NZRA submits that it should be completed by Year 2.</p>
4.3.2 Recreation	Support with revision	<p>NZRA submits that, while an honest attempt has been made, this section does not make adequate reference to the role and impact of recreation on the history and development of the area. This includes, but is not limited to guided mountaineering, private mountaineering, exploration, hunting and tramping.</p>
4.3.2 Recreation	Support with relocation within the Plan	<p>NZRA submits that the investigation of geothermal heat exchange opportunities should be relocated to the Outcomes, Policies or Milestones section of the chapter.</p>
4.3.2 Recreation	Support with revision	<p>NZRA applauds the Departments efforts to support and engage with community groups involved in the volunteer maintenance of recreational assets such as huts and tracks. However, the final sentence of this section lacks ambition and detail. NZRA submits that the department should develop more textured wording that encapsulates the potential of these partnerships. NZRA submits that this should be relocated to the Outcomes, Policies or Milestones section of the chapter.</p>
4.3.2 Aircraft	Support with addition of a Landing Site	<p>NZRA supports the WWNZ proposal that a Landing Site at Niblick Creek, 2km south (upstream) of Cassel Flat Hut, should be added to the Plan. This would enable intermediate kayakers to enjoy the National Park from the perspective of the Karangarua River. NZRA notes that there are very few other rivers accessible to intermediate level kayakers in the West Coast Region.</p>

<p>4.3.2 Outcomes Recreational Values</p>	<p>Comment</p>	<p>NZRA submits that the Outcome relating to the Copland Track beyond Douglas Rock Hut to the main divide, needs to be integrated with planning within the Aoraki Mount Cook National Park Management Plan. NZRA supports the maintenance of tracks that support a challenging transalpine crossing to Aoraki Mount Cook.</p>
<p>4.3.2 Outcomes Hunting</p>	<p>Support with amendment</p>	<p>NZRA submits that this section should make reference to the Himalayan Tahr Management Plan 1993.</p>
<p>4.3.2 Policy 2 (b)</p>	<p>Support with revision</p>	<p>NZRA submits that 'equitable allocation' is unclear. This policy needs to be more explicitly describe what equitable allocation is and how it would be quantified.</p>
<p>4.3.2 Policy 7 (b)</p>	<p>Support</p>	<p>NZRA applauds the departments efforts to support recreational hunting by allowing aircraft landings at these huts.</p>
<p>4.3.2 Milestones</p>	<p>Support with revision</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.</p> <p>NZRA submits there is a general lack of ambition, clarity and concrete results for the recreational community in this section.</p> <p>NZRA submits that there should be less use of words such as 'prepared', 'investigated' and 'initiated'. We submit that there should be more milestones that include more concrete verbs such as 'built', 'implemented' and 'provided'</p>