



Submission to the
Department of Conservation *Te Papa Atawhai*
on the
Amendments to the West Coast Te Tai O Poutini
Conservation Management Strategy

Date: 22 May 2019

TOURISM INDUSTRY AOTEAROA

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Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on the West Coast Te Tai Poutini Conservation Management Strategy 2010 amendments.

This submission is filed without prejudice to TIA's future position. Our ability to prepare a comprehensive submission responding to the consultation document relied on the provision by the Department of Conservation *Te Papa Atawhai* (DOC) of information relevant to the connection between the consultation document and the benefits that would accrue. If any information is provided at a later date, TIA reserve the right to comment further.

EXECUTIVE SUMMARY

1. TIA has concerns about how DOC is undertaking its planning processes for National Parks and specifically about the proposed amendment process for the West Coast CMS.
2. Some of the proposed amendments to the CMS may warrant a partial review rather than an amendment, as they could have an impact on the overall nature of Paparoa National Park.
3. With the new track developments, visitor numbers to Paparoa National Park are likely to increase. The potential added pressures need to be carefully managed to ensure that the inherent value of the park is protected.
4. The amendments to the CMS to enable the Paparoa National Park Plan and to allow for limited aircraft landings is a significant one and we are not convinced that the impact of the proposed aircraft landings have been fully evaluated.
5. Competitive and sporting events are a way to connect people to our natural places and have been successfully managed in places such as the Kepler Track. If sporting and competitive events are allowed in the Paparoa National Park, they should be limited in frequency, number of participants and be confined to existing tracks.
6. We are supportive of prohibiting camping within 500 metres of the Paparoa Track and the Pike29 Memorial Track, outside Paparoa National Park, unless within a designated campsite.
7. We are supportive of allowing mountain bikes on the Heaphy Track (between May and November), Old Ghost Road and the Paparoa Track. We are unsure whether mountain biking on the Pike29 Memorial Track - a place for quiet reflection and remembrance - would be appropriate. Electric mountain bikes, which are quickly becoming a popular choice for riders of all abilities, should be allowed and classified the same as other mountain bikes.

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INTRODUCTION

8. Tourism Industry Aotearoa (TIA) is the peak body for the tourism industry in New Zealand. With around 1,600 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure and other activities, attractions and retail, airports and airlines, transport, as well as related tourism services.
9. The primary role of TIA is to be the voice of the tourism industry. This includes working for members on advocacy, policy, communication, events, membership and business capability. The team is based in Wellington and is led by Chief Executive, Chris Roberts.
10. Any enquiries relating to this paper should in the first instance be referred to Steve Hanrahan, TIA Advocacy Manager at steve.hanrahan@tia.org.nz
11. We would like to thank DOC for providing us with an extension on the submission date.

STAKEHOLDER CONSULTATION

12. In preparing this submission we have engaged with TIA members on the West Coast and other advocacy groups such as Forest & Bird, Federated Mountain Clubs (FMC) and Recreation Aotearoa.

COMMENT

Tourism 2025 and Beyond

13. [Tourism 2025 and Beyond](#) is the New Zealand tourism industry's growth framework. It has been created by industry, for industry and keeps the tourism industry's focus firmly on growing our value to individuals, communities, the environment, the economy and our visitors. Its development is led by Tourism Industry Aotearoa.
14. Tourism 2025 and Beyond was launched in May 2019 and has a vision of 'Growing a sustainable tourism industry that benefits New Zealanders.' It is closely aligned with the New Zealand-Aotearoa Government Tourism Strategy and takes a balanced scorecard perspective to:
 - Make sure our visitors are having great experiences
 - Make sure our communities are happy with and benefitting from tourism
 - Make sure our environment benefits from tourism, and
 - Bring economic success.

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15. Tourism 2025 & Beyond has four key goals – one for each of the main framework elements:

- Visitor - International and domestic satisfaction of 95%
- Community - 90% of New Zealanders are happy with the level of tourism and support growth
- Environment - 90% of tourism businesses have Environmental Plans to measure and manage their carbon, waste and ecological footprint
- Economic - Annual tourism spend of \$50 billion by 2025.

Our understanding of the issue

16. The West Coast Te Tai Poutini Conservation Management Strategy 2010 (CMS) is DOC's overarching statutory planning document for the West Coast region.

17. In 2017, the New Zealand Conservation Authority approved the Paparoa National Park Management Plan (the Plan). The Plan provides for:

- A new Great Walk comprising the Paparoa Track and Pike29 Memorial Track
- Associated activities such as mountain biking, aircraft landings, and sporting and other competitive events

18. During the Plan review process, DOC identified the need to amend the CMS to ensure the Plan was consistent with the CMS. The CMS amendments are to:

- Allow mountain biking on the Great Walk
- Allow for aircraft landings on the Great Walk to support walkers and mountain bikers
- Allow for aircraft landings in other areas of Paparoa National Park
- Allow for sporting and other competitive events on the Great Walk and in other areas of Paparoa National Park
- Prevent e-bikes being used on the Great Walk
- Ensure these activities, and camping, are managed consistently on the Great Walk outside Paparoa National Park.

19. The Paparoa Track is due to open to the public in October 2019.

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General

TIA is concerned about how DOC is undertaking its planning processes for National Parks and specifically about the proposed amendment process for the West Coast CMS.

20. During the 2017 Paparoa National Park Plan review, DOC identified the need to amend the CMS to ensure the Plan was consistent with the CMS, and DOC is now advancing an amendment to the West Coast CMS to reflect the provisions of the Plan. Following this process means that lower order documents are determining the contents of higher order documents. This is contrary to the requirements of the National Parks Act 1980 and the Conservation Act 1987. The new Paparoa National Park Plan allows something that is prohibited in the older CMS.
21. We agree with Forest & Bird and others that some of the proposed amendments to the CMS warrant a partial review rather than an amendment. Some of the proposed amendments could have an impact on the nature of Paparoa National Park – known for its quiet, remoteness, solitude, and as a premier example of natural New Zealand (see p206, CMS).
22. The tourism industry's goal is to grow a sustainable tourism industry that benefits New Zealanders. Inherent in this is that tourism strongly contributes to protecting, restoring and enhancing New Zealand's natural environment and biodiversity. We want to establish a positive and enduring relationship with New Zealand's environment and biodiversity. Paparoa National Park is an outstanding example of natural New Zealand and provides a remarkable opportunity to connect visitors to our nature. We agree with DOC that visitor numbers to Paparoa National Park are likely to increase during the term of the current CMS and that this could put pressure on existing facilities and may create new demands. Visitor numbers and the potential added pressures need to be carefully managed to ensure that the inherent value of the park is protected.
23. The lack of planning and following the proper process, and the inconsistencies between National Park Plans and the CMS, has led to an uncertain environment for tourism operators.

Any aircraft landings must be carefully managed and evaluated

24. The current CMS explicitly states that aircraft landings for recreational purposes are not permitted in Paparoa National Park (p129, CMS), and that DOC should strongly advocate against scenic flights over Paparoa National Park and the adjacent Paparoa Wilderness Area (p216, CMS).
25. The amendments to the CMS to enable the Paparoa National Park Plan and to allow for limited aircraft landings is therefore a significant one. The intention appears to be to facilitate access for walkers and bikers using the Paparoa Track.

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26. Based on the CMS amendment consultation document, we are not convinced that the impact of the proposed aircraft landings have been fully evaluated, with respect to the overall value of the visitor experience in the Park.
27. In addition, based on the information provided, it is unclear whether the landing location near Ces Clarke Hut is the most appropriate site for dropping off and picking people up. There is also no explanation why five landings per day is the acceptable level of activity.
28. The amended section 4.2.3.7 of the CMS now reads *'People are attracted to the wide range of recreational opportunities which the Paparoa Place offers, including the Paparoa Track. ... Concession activities are of low impact and are sympathetic to, and in keeping with, the outstanding natural character of the Place, including minimising and the absence of intrusive noise.'*
29. In allowing for 'minimal intrusive noise', care must be taken to retain, as far as possible, natural quiet as an intrinsic value of the Park, particularly as it incorporates the Pike29 Memorial Track.

Sporting and other competitive events must avoid adverse environmental impact

30. The Paparoa National Park Plan allows for sporting and other competitive events. The proposed CMS amendment in section 3.6.1.4 says: *However, in some places these patterns are now undergoing change as new activities (e.g. kayaking, rafting, mountain biking, and sporting and other competitive events) create demands for access to areas in the backcountry-remote zone.*
31. As noted, Paparoa National Park is renowned for its natural quiet, the retention of its outstanding natural remote character and its range of low-impact, nature-based, passive recreational activities (p215, CMS). Sporting and other competitive events in such locations can comprise of the low-impact, nature-based, recreational activities of kayaking, rafting or mountain biking. However, events can involve significant numbers of people using the area at the same time.
32. Competitive and sporting events are, however, another way to connect people to our natural places and have been successfully managed in places such as the Kepler Track. They also encourage greater regional dispersal and visitor spend, bringing athletes and their families/supporters to a region. We recommend that if sporting and competitive events are included in the Paparoa National Park, they are limited in frequency, are restricted in number of participants and are confined to existing tracks (as opposed to any off-track activity).
33. In section 3.6.1 Policies, sporting and other competitive events are being classed together with outdoor education, leadership and instruction programmes. Sporting and other competitive events have a very different nature from outdoor education,

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leadership and instruction programmes and the CMS should not class these activities together. For similar reasons, we suggest DOC removes 'as well as controlled competitive events' from the amendment in section 4.2.3.2. We suggest that if sporting or competitive events are included in the CMS as an option for Paparoa National Park, they are included in a separate statement.

Camping

34. We are supportive of prohibiting camping within 500 metres of the Paparoa Track and the Pike29 Memorial Track, outside Paparoa National Park, unless within a designated campsite. This is similar to how camping is managed around other Great Walks.

Non-powered vehicles (mountain biking)

35. We are supportive of allowing non-powered vehicles on the Heaphy Track (between May and November), Old Ghost Road and the Paparoa Track. This would be in line with the current CMS which says: *The Department should work with cycling clubs, adjoining landowners and other interested people and organisations to further identify, grade and map roads and tracks on public conservation land in the Conservancy where non-powered vehicle use is appropriate.*

36. Most of these tracks, such as the Heaphy Track and the Old Ghost Road, are already widely used and promoted for mountain biking. Although the CMS should have been amended before DOC started opening up these tracks to mountain biking, we are pleased to see that this will finally happen.

37. Mountain biking is a low-impact, nature-based, passive recreational activity and as such, appropriate in Paparoa National Park.

38. We are unsure whether mountain biking on the Pike29 Memorial Track would be appropriate. As described in the amended section 4.2.5.6, the Pike River Mine site is a place for quiet reflection and remembrance. Without having clear information and feedback from our members on the type of experience this walk offers, we are unsure if mountain biking would have a negative impact on this important opportunity for quiet reflection.

39. Subject to above, we are supportive of the proposed amendment to manage the use of mountain bikes on the Pike29 Memorial Track and the Paparoa Track outside Paparoa National Park by:

- Requiring mountain bikes to remain on the formed tracks;
- Prohibiting the use of mountain bikes on the tracks during the hours of darkness; and
- Prohibiting the taking of mountain bikes into a hut, including on or under the hut's steps, verandas or porches.

40. We do not believe that e-bikes should be classified as a vehicle in the CMS. Even the most experienced mountain-bikers are now using e-bikes. It is likely that within a few

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years, the majority of mountain bikes will have some electrical assistance available to the rider. Many people will choose to ride trails such as the Heaphy Track, the Old Ghost Road and Paparoa Track on an e-mountain bike. By allowing e-mountain bikes on these tracks, DOC would create greater opportunities for recreation. This would be consistent with DOC's role of *'Managing natural and historic resources for conservation purposes, while fostering recreation and allowing for tourism when consistent with conservation objectives'*. It is unclear to us what DOC is trying to achieve by excluding e-bikes on these trails. E-bikes should simply be included as a type of mountain bike.

Desired Outcome for Paparoa Place

41. We are supportive of the amendment to the Desired Outcome for Paparoa Place: *The Paparoa and Pike29 Memorial tracks comprise a successful Great Walk, with overnight facilities, where visitors can enjoy easily accessible walking and mountain biking opportunities.*

Follow up process

42. TIA wishes to participate further in any follow-up process, including any formal meetings, to ensure that the potential impacts on tourism are adequately represented.

BACKGROUND

43. Tourism for New Zealand is big business as the country's largest export sector. It is a major contributor to the New Zealand economy that will always be here and won't easily go offshore. Tourism takes the lead in promoting New Zealand to the world. The brand positioning built by a vibrant tourism industry has become an important source of national confidence and identity and a front window for "Brand New Zealand". Indeed, the clean and pure offer that is synonymous with New Zealand tourism has been widely adopted and used to promote New Zealand exports in a range of other industries as well.

44. The tourism industry delivers the following value to New Zealand's economy:

- Tourism in New Zealand is a \$107 million per day and \$39.1 billion a year industry. Tourism delivers around \$44 million in foreign exchange to the New Zealand economy each day of the year. Domestic tourism contributes another \$63 million in economic activity every day.
- The tourism industry directly and indirectly supports 13.5% of the total number of people employed in New Zealand. That means 365,316 people are working in the visitor economy.
- Tourism is New Zealand's biggest export industry, earning \$16.2 billion or 20.6% of New Zealand's foreign exchange earnings (year ended March 2018).

End.

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