



Submission to
Department of Conservation on
Draft Westland Tai Poutini National Park Management Plan

Date: 4 February 2019

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on the Draft Westland Tai Poutini National Park Management Plan (Plan). This submission represents the views of Tourism Industry Aotearoa as a collective whole and may not necessarily represent the views of individual members.

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 (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 reserves the right to comment further.

Executive Summary

The Conservation/Tourism Partnership is one of the key relationships for the tourism industry. Many New Zealanders feel a close affinity to nature and seek out experiences around the country, and the primary reason many of our international visitors come to New Zealand is to see our vistas and landscapes and experience the outdoors. Much of this activity occurs on the conservation estate. In 2015, TIA and DOC signed a formal partnership agreement which seeks to provide for both tourism and conservation in a mutually beneficial framework, enabled by a vision of 'A partnership that is positive, enduring and a win/win for tourism and conservation'.

The Plan's attention to the management of visitors is to be commended. There is no doubt that this is the area of most significant change and increased pressure in managing the Westland Tai Poutini National Park. International visitor numbers have increased dramatically, our domestic population has grown substantially, and people's appetite to interact with our national parks remains strong.

Many people who visit the Westland Tai Poutini National Park either need or choose to do so with support from concessionaires, while others do so under their own steam. The experience from these two types of visitors is equally as valuable. However, meeting varied needs can be challenging as the preferred experience of one group may not be compatible with the other e.g. trampers in a remote area wanting tranquility vs. visitors who choose to fly in. TIA firmly believes that the needs of different groups can be met and that these visitor experiences can be catered for in the Park, albeit not always in the same place and at the same time. The management of activities by limiting where, when and how often they occur are important tools which TIA supports. Taking a whole-of-park approach to allocating these limits is important and TIA acknowledges DOC's attempts to do this.

Our domestic population and visitor economy are now both of a size where people cannot expect to do whatever they like, whenever and wherever they like in our national parks. This paradigm and the associated management limits which come with it is not new for concessionaires, but will be for many of the people who visit our national parks under their own steam. This change may require significant adjustment for many people and will need to be managed with great care. Introducing new management tools such as park & ride and gondolas into our national parks are significant changes for New Zealanders. The debate over these proposals may well include a conversation on preferential access for New Zealanders.

A step change is necessary in how we manage our national parks. TIA can see that DOC are trying to achieve this and we support their effort to do so. There is, however, much detail to be worked through to ensure these efforts achieve their intended outcomes. Change must be community-led and DOC must be very clear on what it's doing and why.

People must feel that their visitor experience is valued, and that their use of the Park has been allocated fairly. They need to clearly understand what type of experience they can have in different parts of the Park, particularly in terms of interaction with other visitors.

Our feedback to DOC is that they listen carefully to submissions from recreational groups and concessionaires and adjust the Plan until the various visitor experiences are administered for and clearly understood. TIA has identified more than 40 areas of the draft Plan where further analysis and discussion is required.

We also recommend that the purpose of our parks as defined in the National Park Act plays a more dominant role in setting the context for the Plan. The Act aims to preserve our highly valued natural places in perpetuity – for their intrinsic worth and for the benefit, use and enjoyment of the public. TIA believes that the Plan would better reflect our and the New Zealand public's expectations if it's context was more centered on the importance of the conservation aspect of the management of the Park.

We look forward to working with DOC and other stakeholders to refine the draft and develop a Plan which meets the challenges of today's context as well as being fit for purpose over the full life of the Plan. The ability for the Plan to be reviewed as required will be important to this.

Introduction

1. 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.
2. The primary role of TIA is to be the voice of the tourism industry. This includes providing leadership and advocacy across the breadth of the visitor economy including domestic and international visitors, and 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.

Stakeholder Engagement

3. During the development of this submission we have engaged with various stakeholders including TIA members. This has included aircraft operators, guided climbing operators, glacier experience operators, heliski operators, operators interested in applying for concessioned activity in the future, West Coast Tourism, the NZ Mountain Guides Association, the NZ Recreation Association, the NZ Alpine Club, Federated Mountain Clubs and WhiteWater NZ. We acknowledge and thank them for their input.
4. Any enquiries relating to this paper should in the first instance be referred to Rachael Moore, TIA Industry Advocate, at rachael.moore@tia.org.nz or by phone on 021 0225 2497.

The Conservation/Tourism Partnership

5. In 2015, TIA and DOC signed a formal partnership agreement which seeks to provide for both tourism and conservation in a mutually beneficial framework. The agreement includes a vision statement of 'A partnership that is positive, enduring and a win/win for tourism and conservation' and is supported by a set of principles and strategic goals. An ongoing close partnership between TIA and DOC allows both the preservation of natural resources and an evolving and sustainable presence of tourism operations in national parks to be better catered for and kept front of mind. TIA considers that enabling visitors to enjoy and access national parks provides a valuable opportunity to highlight the importance of New Zealand's public conservation land, and for visitors in turn to understand and care for those important places.
6. TIA is also currently working closely with DOC as they develop their Heritage and Visitor Strategy. TIA sees the Strategy as an opportunity for DOC to establish an internal approach to managing visitors and concessionaires that is coherent, streamlined and aligned with the Government Tourism Strategy, other government departments and the tourism industry's 2025 framework. With the new DOC Heritage and Visitor Strategy scheduled for adoption in 2019, all future park plans should reflect its vision and principles.
7. TIA's key priorities for working with DOC to cater for visitor experience through the Park Plans are to:
 - Collaborate closely to share and understand tourism and conservation objectives;

- Improve access and appropriate opportunities on public conservation land for tourism operators through more responsive Park Plans;
 - Ensure that any limits on use of resources are put in place in accordance with reliable evidence, that a preference is given for adaptive limit setting according to policies and set outcomes, and that the impact of any limits on visitor access and business operations is taken into consideration;
 - Enable a consistent and transparent concession application and renewal process which provides certainty for stakeholders;
 - Implement effective monitoring and enforcement systems;
 - Ensure Park Plan requirements are consistent with tourism industry best practice standards, including aligning with user group agreements and written best practice standards where relevant.
8. TIA sees every National Park Plan review as an opportunity to do things better - to provide for the preservation and protection of the natural environment, whilst allowing opportunities for domestic and international visitors to have access to positive outdoor experiences, and contributing to the resilience of local communities and their local tourism operators.
 9. TIA truly believes that conservation and tourism can be managed in a way to benefit both. Where people are able to experience a national park environment they in turn become connected to that place. When done well, this supports a sense of ownership, responsibility and understanding for the values of conservation.
 10. Tourism operators provide significant benefits to national parks including supporting the engagement of people with natural places, controlling and managing that engagement, concession fees, direct enhancement of the natural environment, education benefits, and infrastructure development.
 11. Provisions within park plans should be developed in a 'community-led' way, to provide a document which serves the needs of the entire community of park users including iwi, visitors, tourism operators, researchers and education.
 12. TIA considers that all visitors to a National Park, whether commercially associated or not, should be treated as having equal value in Park Plans. This approach would reflect the general purpose section of the National Parks Act 1980 which provides that national parks are to be 'preserved...for their intrinsic worth and for the benefit, use, and enjoyment of the public...'. At no point in this general purpose section or in other parts of the Act is there a distinction between commercial and other users of national parks. Previous park plans seem to have given preference to the experience of privately derived recreation. The Act however clearly envisages that the public at large share in the enjoyment and benefit of access to national parks. Both private and commercially derived recreation need to be equally provided for in order to give life to this intention for the optimum experience for all visitors.

Section One – The Plan’s function, structure and development process

Closer collaboration between DOC and TIA/Industry

13. The Plan states that decisions on the use of resources directly relevant to tourism industry operations are made in consultation with the appropriate industry body representatives. However, it is not always clear who these appropriate industry body representatives are and a consistent use of concepts is needed – at the moment the

draft refers to businesses, recreational groups, TIA, tourism body representatives, commercial recreation providers, others, concessionaires, and other promotional groups.

14. TIA leads the development of the New Zealand Tourism Sustainability Commitment (TSC). The TSC aims to see every New Zealand tourism business committed to sustainability and has the vision of 'Leading the World in Sustainable Tourism'. It was launched in November 2018 and to date has 750 members.
15. The TSC is based on a balanced-scorecard approach, with economic, host community, visitor and environmental goals. Supporting these goals, are 14 commitments which outline the actions that businesses can take to operate more sustainably. It is through the actions of many businesses that the overarching aim of a sustainable tourism industry will be achieved.

Many tourism businesses operating in National Parks have signed the Tourism Sustainability Commitment (TSC). TIA suggests that a TSC commitment is taken into account when assessing a business's suitability to operate in a National Park.

16. Where the Plan refers to recreation, TIA is often not included in the consultation process. Any delineation between tourism and recreation is arbitrary. Recreation is part of the tourism sector (for all those doing some form of recreation away from their home areas). The provisions of the Plan which relate to recreation (whether commercial or private) need to provide specific assurance that decisions will be made in accordance with consultation of appropriate industry body representatives including TIA. Reference to the DOC/TIA formal partnership agreement would ensure certainty in such provisions.
17. The Plan refers to a possible review of the conditions of the concessionaire system but does not specifically mention the need for industry consultation. It must be amended to include this.

Integrated Management Plans for National Parks

18. TIA considers that park plans should provide for the integrated management of national parks, particularly those which are adjacent or within close proximity to each other. Such provisions would emphasise the need for coordinated management of activities that cross administrative boundaries and a collaborative approach to management of national park resources. Natural and physical resources are interconnected within and across parks and where parks share a boundary or are in close proximity, there can be multiple users, management entities and kaitiaki involved in the administration of the relevant park plans. Integrated management would support quality visitor experiences, assist tourism operator business planning and enable more efficient park management and administration.
19. Integrated management also supports early identification of conflicting use issues and the provision of processes to resolve these. Additionally, it helps to ensure that links between various resources (e.g. ecosystems, tracks and huts, air space, natural quiet, and landscapes) and the effects of activities associated with those resources are recognised and managed in a practical way.
20. TIA is pleased that DOC have developed the draft Aoraki/Mt Cook National Park Plan at the same time as this Plan and applied similar systemic changes to both. We strongly encourage this co-development approach being taken with the upcoming drafting of the Aspiring and Fiordland Park Plans.

The Vision

21. TIA generally supports the vision statement for the Park, however we believe it lacks sufficient emphasis on the important role of the Park in enriching people's lives through outdoor recreation.

Position:

- TIA recommends that the vision for the Park be amended to include reference to the role of the Park in ensuring that the lives of New Zealanders and visitors are enriched by inspiring and enjoyable outdoor recreation experiences.

A more overt acknowledgment of conservation value and aims

22. TIA recommends that the purpose of our parks as defined in the National Park Act plays a more dominant role in setting the context for the Plan. The Act aims to preserve our highly valued natural places in perpetuity – for their intrinsic worth and for the benefit, use and enjoyment of the public. The detail within the Plan does strongly support conservation aims, however TIA believes that the contextual statements should give more weight to this point in order to better reflect our and the New Zealand public's conservation expectations.

Flexibility of the Plan, Milestones and Monitoring

23. TIA believes there should be a stated expectation that park plans will be amended during their lifetime. Many of the issues being experienced now are exacerbated due to DOC, operators and other interests trying to work with what have become untenable park plans. This includes important areas such as car-parking, hut management, trail development, aircraft landing numbers and sites.
24. The current paradigm seems to be that park plans are not expected to change and where change is required a partial park plan review can occur. However partial park plan reviews are a thing of theory and almost never occur. This sets up a totally unrealistic expectation that plans can incorporate the detail required to manage the park and also remain fit for purpose for ten years.
25. The milestone concept seems to be aiming to address this issue. However, TIA has concerns that it may not go far enough. The milestones do not represent all the work required to achieve the objectives in a plan, which raises the question: will DOC focus on achieving the plan's objectives, or only on the milestones? It is also unclear what will happen if monitoring required in the milestones identifies a need to change something in a plan.
26. There are limits stated in the Plan. The Plan must also include objectives, policies and milestones to monitor, review and amend the limits as required to manage their real impact.
27. With more than 170 pages, the Plan is extensive and detailed. It would be useful if the proposed policies and milestones were collated in one place.

Positions

- TIA submits that in order to ensure that park plans meets their objectives, DOC commits to amending plans as required during their life time and that this is stated in this Plan itself.

- TIA submits that DOC ensure there is a fit for purpose change mechanism to amend plans, and that this includes consultation with key stakeholders including tourism operators, resourcing within DOC and responsive timelines.
- TIA supports the use of milestones and submits that:
 - The Plan clarifies how milestones will interact with the delivery of objectives and policies which they do not address.
 - Milestones include the requirement to monitor and review any hard limits, and to amend the Plan in response to findings as relevant.
- TIA submits that all hard limits in the Plan include clear statements on the evidence behind the limits and the impacts they are designed to manage.
- TIA recommends that DOC collate the policies and milestones in one place in the Plan.

Telling the Tourism and Recreation Story

28. TIA supports the Plan's strong emphasis on the iwi story and connection with the Park. We do, however, note that the history and heritage of tourism and mountain recreation is not suitably told.
29. The Westland and Aoraki Parks were arguably the birthplace of activity-based recreational tourism in New Zealand. Guided mountaineering onto the glaciers and into the high alpine areas has an important and rich history. This history has very much shaped the use of the Parks today, and the deep connection of tourism and recreational stakeholders with the Park. The history of tourism and mountain recreation is deeply connected to these two Parks and should be integral to the context of the Plans and in the information available to visitors.

Positions

- TIA submits that the story of the Park's history and current context of tourism and mountain recreation be clearly told in the introduction and contextual sections of the Plan, and be a fundamental aspect of the Plan's values statements. Tourism operators must be consulted in the formation of this story.
- TIA submits that the Plan's objectives and resulting policies and milestones be re-assessed to suitably reflect the importance of this history and of the tourism and mountain recreation taking place in the Park today.

The role of Iwi in administering the Plan

30. TIA is pleased to see the Plan give life to Iwi's role as treaty partner in administering the Plan. The Plan should also acknowledge that Iwi may have a commercial interest in the Park and that where this occurs it must be given due regard in how Iwi fulfil their administrative role.

Acknowledging the important role of concessionaires in providing recreation experiences and connecting people to place

31. We are supportive of the objectives of Section 2.4.1. However, we note that the associated policies do not recognise or enable the role of the commercial sector in achieving the objectives. The commercial sector is a critical part of ensuring that the lives of New Zealanders and our international visitors to Westland Tai Poutini National

Park are enriched by inspiring and enjoyable outdoor recreation experiences. DOC is not the sole provider of these experiences, and nor should it be. The vast majority of visitors cannot interact with the Park without some degree of commercial support – most are either not technically skilled enough or not physically able to do so.

32. Commercially provided opportunities also present a strong tool for DOC to help manage safety and ensure people have valuable experiences in the Park.
33. By not acknowledging the role of commercial providers in section 2.4.1, the Plan sets itself up for insufficient focus on this important enabler.

Positions

- TIA submits that the objectives in Section 2.4.1 should distinctly refer to the important role of commercial providers in supporting the inspiring and enjoyable outdoor recreation experiences of visitors to our parks.
- TIA submits that the associated policiess and milestones be adjusted to suitably enable the role of the commercial sector in achieving this objective.
- The Plan should include a specific aim of improving access and opportunities for concessionaires.

Equally valuing the experience of self-supported and commercially-supported visitors

34. TIA acknowledges the Plan for generally working to equally manage the flow, experience and impact of visitors in the Park regardless of whether they are supported by concessionaires or not. This shows an important evolution in DOC's understanding of the visitor ecology and should result in plans being much more adept at achieving strong visitor outcomes for all stakeholders in national parks.
35. TIA notes that Appendix Two of the Plan (Page 163) states that "Concessionaire client activities should not be advantaged or disadvantaged compared with non-concessionaire visitors, unless there is a specified reason for different management". TIA endorses this statement.

Positions

- TIA strongly supports the Plan's approach to managing visitors as a whole rather than treating the experience of visitors supported by concessionaires as inherently less important than those who are not.
- TIA supports the abovementioned statement in Appendix Two and submits that it be included as a cornerstone statement in Section 2.4 Recreational Values.

Managing Restrictions and Limits

36. Any restrictions and limits placed to give effect to park plans should be formulated based upon sound evidence and be easily and consistently enforced and monitored. TIA considers that where prescriptive limits are set in the Plan, these must be based on sound and tested evidence to justify the need for such a limit.
37. A hard limit in a national park plan has the potential to become quickly outdated and therefore not provide for the purpose of the Plan. The use and enjoyment of resources is a matter which can change according to updated best practices, the nature of the resource, changing patterns of use and the finite capacity of the resource. Where

hard limits are prescribed in a plan itself rather than by reference to an external limit, this can quickly become outdated and difficult to implement.

38. There is a balance to be struck between setting limits that provide certainty for users and operators and support for conservation aims, and having a framework that is responsive and adaptive to changes in the environment, expectations and use patterns, and increased knowledge and understanding.
39. TIA considers that where there is insufficient evidence to justify a hard limit for use of resources, the Plan should instead provide clear guiding principles, objectives and methods to establish a consistent framework under which decision makers can assess and provide for suitable uses. In those circumstances, the Plan should set the narrative objective for a site or area, and limits set adaptively outside of the Plan, to give effect to the set objective.
40. TIA is disappointed to see that hard limits remain included in the Westland Tai Poutini National Park Plan and that we do not see any progress in outlining the evidence used to establish the limits - rather it seems they are solely based on current use levels.

Positions: TIA submits that:

- Each particular resource which is desired to be subject to a limit on its use be clearly identified for its particular aspects which require protection.
- Evidence must be gathered which considers the particulars of the resource against the impacts of use of that resource, and that the nature of this evidence be communicated in the Plan.
- Where the evidence establishes a finite capacity of use of the resource, and that limit is justified by evidence and accepted by the community and decision makers, a limit be prescribed by reference in the Plan. A reference in the Plan to such limits provides an appropriate balance between certainty and flexibility so as to ensure that changes in the industry in the future can be provided for in the Plan without requiring full scale reform.
- Before implementing a limit in accordance with the finite capacity of a resource, regard must be had to other alternative options, including a preference for providing flexible limits which are determined according to guiding principles and policies.
- Where there is no reliable and tested evidence to establish a limit on use, specific principles and provisions should be established to give guidance to a decision maker and stakeholders to determine the appropriate level of use for the resource.

Managing Limited Supply Concession Allocation

41. Limited Supply Concession allocation requires careful and consistent management. It requires a balance between monopoly situations and ensuring that businesses are incentivised to invest and run quality operations. Many limited supply concessions involve large capital cost investment.
42. The draft Park Plans take an overly simplistic approach to allocating limited supply concessions. The suggested policy fails to address most of the serious risks involved – risks which pertain to DOC and businesses alike.

43. A Limited Supply Concession Agreement was signed by the Ministry of Tourism, DOC and TIA in August 2008. While the Agreement was developed over a decade ago, the issues it aimed to address still exist and many of its solutions remain valid. It should provide the basis for discussion of any limited supply allocation policy.

Positions

- TIA submits that the policy on allocating limited supply concessions be re-drafted to address the issues raised in the Ministry of Tourism, DOC, TIA Limited Supply Concession Agreement.
- TIA submits that the policy will be complex and will need to apply nationally, and that it is better suited to sit outside the Plan and be referenced by the Plan.

The redrafting of the policy on allocating limited supply concessions must involve consultation with TIA.

Decisions on Concessions

44. The structure of the Plan should provide a reference to the general overview of the concession application and decision making process plus detail provisions that specifically relate to the National Park. The specific concession sections will provide detailed guidance to applicants and operators which are then supplemented by the DOC general concession process, which is publicly available. This will provide a good balance between detail provided in the Plan, and flexibility to update the general process which sits exterior to the Plan - but which is common to all documents.
45. This structure must be more explicit in the criteria and their weighting and what factors must be strictly complied with before concessions are granted in the National Park. A system of criteria like this is helpful to guide applicants through the process, but must be based upon reliable evidence.
46. The following criteria are provided as examples:
- a) Criteria for determining concessions must accord with the general purposes of relevant Acts, and include positive benefits of a proposal.
 - b) Criteria for determining concessions must include consideration of existing concessionaires, and cumulative effects based upon reliable data.
 - c) Criteria which prescribes what factors are appropriate to take into account when imposing conditions.
 - d) Criteria for achieving conservation gains.
47. TIA sees some evidence of this approach in the Plan, however it is still not consistent nor comprehensive. It is also important that where relevant, criteria is accompanied by a system of higher/lower weighting or which are 'absolutes' within each criteria itself.
48. TIA notes that one of the criteria in the Plan is 'operator experience'. We submit that this criteria should be removed as it appears to block new operators from being able to gain a concession in a national park.

Consistency with Industry Best Practice

49. Park plans should provide that industry best practice standards should be followed by park users rather than providing for duplicate standards. This will ensure consistency across a number of sectors operating within parks, and ensure that park plans have the necessary flexibility to adapt to industry changes and improvements. Industry best practice is often found in written guidelines or user group agreements, however where no such formalised structure exists for a particular area or activity park plans should refer to implementation of 'industry best practices' so as not to implement standards which might not otherwise have an evidential base. TIA is pleased to see the Plan reference external good practice standards in relation to Bolting within the Park.
50. TIA asks that reference be made in the Plan to the DOC safety and audit requirements to ensure there is no conflict with industry best practice or regulatory requirements.

Consideration of the risks of Climate Change and the Alpine Fault

51. TIA commends the Plan's recognition of the risk presented by both Climate Change and the Alpine Fault, and the efforts it makes to plan for their impact.

Acknowledging the importance that New Zealanders and our visitors are enriched by outdoor experiences.

52. TIA is pleased to see that the Plan recognises the importance of New Zealanders and our visitors being enriched by outdoor experiences.
53. We are particularly supportive of Section 2.4.1 and particularly Policies 3-7. We do however require more information on the implication of Milestone 11 on existing concessionaires.

Positions:

- TIA request that DOC supply information on the implications of Milestone 11 on existing concessionaires.
- TIA submits that Section 2.4.1 policy 3b) include reference to working with TIA.

The draft Plan development process

54. TIA acknowledges DOC's efforts to bring the Plan into a more current format and to respond to pre-draft submissions and the substantial contextual changes that have occurred since the last Plan was written.
55. This has necessarily resulted in substantive changes to the Plan structure and content, and to its management tools. Unfortunately, there has been a lack of accompanying information from DOC on what has changed, why it has changed, how the changes interact, how they will be implemented and what they mean in terms of visitor experience and conservation outcomes in the Park. This has led to substantial confusion among our members and stakeholders.
56. There are several points in our submission asking DOC to further consult with tourism operators and stakeholders to ensure that changes in the Plan are meeting their visitation needs and conservation aims. TIA is aware that this will require resource and take time, however these points are not made lightly and come from our acute awareness of the importance of the Plan and the lack of understanding around the substantive changes.

57. DOC should have run an information process when the draft was released, including in depth discussion papers and engagement opportunities around the country. TIA does acknowledge DOC's response to our requests for more information on the management of air access. TIA asks that a thorough information process is run after the release of the upcoming Aspiring and Fiordland draft National Park Plans.

Positions

- TIA asks that DOC respond to TIA's requests throughout this submission for further engagement with tourism operators and stakeholders, including recreational groups.
- TIA asks DOC to prepare thorough information on all the request topics to ensure stakeholder understanding of the changes, how they interact (where relevant) and how they will be implemented.

Section Two – Feedback on Activity Management Proposals of the Plan

Use of the word 'safe'

58. The Plan often refers to the provision of 'safe' outdoor recreation opportunities. E.g. 'identify, provide and manage a range of safe outdoor recreation opportunities'. TIA is a strong advocate for safe and quality experiences, however we are aware that safe is a highly subjective term which relates very much to a particular context and visitor expectation. Its use as described here does not add value to the Plan, rather it could cause misleading expectations in decision makers and visitors alike.

Position:

- TIA asks that the use of the word 'safe' in the Plan is reviewed and adjusted to reflect the above feedback.

Park and Ride

59. TIA is supportive of the Park and Ride concept in principle and considers it an innovative tool to support management of visitor flows and parking congestion, and therefore the overall protection of natural values and visitor experience in the Park. As with any new venture there are risks. We have listed below risks important to tourism operators that need to be addressed in the planning process:
- The requirement to park and ride may deter visitation to the National Park.
 - There are potential barriers to access for concessionaires and recreational users such as climbers and skiers – all of whom have specific access requirements which are different to those of most day-use visitors to the parks.
 - Coach schedules may not fit with itinerary/travel plans of FITs, impacting both visitor experience and visitation numbers.
 - The domestic market, currently not familiar with paying for park and ride systems on DOC land (outside of Tongariro Crossing) could react poorly to the new system.
 - Location of associated new parking or camping facilities may impact adversely on existing businesses such as accommodation providers and transport operators, on natural amenity values, and on the overall visitor experience.

- Costs (initial and on-going) associated with the infrastructure required and management of the facility.
- Lack of integration with visitor flow through the area and/or the value proposition of the region.

60. Areas to consider in planning for a Park and Ride system include:

- A strong focus on impact analysis and mitigation, including consultation with concessionaires, other affected businesses, and recreational groups.
- An integrated approach with relevant local and central government agencies.
- Identification of a sustainable funding mechanism.
- How will the service be provided and what process will support this? Including tender processes, the ability to scale up or down as demand requires, and provision to replace the provider if the service quality is not appropriate.

Position:

- TIA submits that DOC addresses the points raised above in its work to develop a Park and Ride system, and that this work includes consultation with tourism operators and recreational groups.

Paying for parking and/or park and ride facilities

61. TIA is aware that the costs of providing parking and transport services are significant. Fees for parking or transport can be used to help recover these costs and also as a tool to help manage visitor flow.
62. Currently the cost of providing parking areas inside our national parks is carried by DOC. Existing park and ride type services provided outside of public conservation land are run by private businesses who charge a fee for the service, such as at the Tongariro Alpine Crossing. TIA is not opposed to DOC charging for parking services.

Positions

- TIA is supportive of charging for parking and park and ride services, but not to the extent where it provides an unreasonable barrier to visiting the park. Charging for services is a long established part of our national park management system, hut and camp site fees being the most common examples, and it is particularly important that any fees are managed in a way that supports New Zealander's access to our national parks.
- TIA is supportive of differential pricing, however we acknowledge that this can be complex to administer. Differential pricing could apply to specific user groups such as concessionaires and climbing clubs, or between domestic and international visitors.
- The development of payment options must include consultation with affected parties including TIA, concessionaires and recreational user groups. Pricing should be tested on a trial basis, with results informing any final decisions.

Aircraft access – landing zones, daily limits, tranquillity aims, activity specific landing opportunities

63. Aircraft access has long been an integral part of the visitor experience in Westland Tai Poutini National Park. The unique beauty of the mountains and glaciers means that scenic flights and snow/glacier landings are popular with those who are not technically skilled enough to otherwise interact with the mountains. Demand for these experiences is increasing and is likely to continue.
64. The scale of the landscape and the nature of the terrain is such that foot access is often difficult and the majority of recreational visitors also access the high alpine areas by air. This includes independent climbers, ski tours and guided and instructed groups. Climate change and resulting access challenges mean that this demand for air access is increasing and is likely to continue.
65. Aircraft use in the Park is a contentious topic. This is due to social impacts; predominately aircraft noise on other users, and secondary the presence of mechanised access or people who have arrived via air in otherwise back-country areas. It is important to note that aircraft do not have a direct negative ecological impact on the flora or fauna of the Park.
66. It is important to manage these impacts and also to ensure that a range of visitor experiences can be had within the Park. Park plans cannot control airspace so restricting the number and location of aircraft landings has been the primary management tool. The restrictions have been driven by the outcomes of place based recreation/visitor management zones.
67. Concession agreements also contain management tools such as noise abatement requirements, aircraft size recommendations and mandatory membership of aircraft user groups. The user groups work with DOC to establish flight paths and other criteria that contribute to minimise impacts on other users of the parks.
68. TIA has long been supportive of the concept of aircraft landing limits and location restrictions, and of recreation/visitor management zones. TIA also works to support aircraft user groups and endorses their important role.
69. Safety is a critical factor in aircraft use and naturally enforces its own set of restrictions on aircraft access in the parks. Flight and landings in mountain areas is particularly challenging and operators and user groups work together with CAA and DOC on safety.
70. Aircraft businesses are capex-heavy and have very tight operational margins. In order to provide sustainable air access, park plans must enable viable business opportunities. Plans must include sufficient landing opportunities and be able to adapt to changing circumstances within their 10-year lifetime including the advent of quieter aircraft, longer term weather patterns, the nature of landing sites and shifting visitor demands.

Landing Zones

71. TIA is supportive of the shift from landing sites to landing zones. The small size and exact location of snow and ice landing sites has long been a safety concern for operators. The Park is a dynamic environment and pilots need to be able to adjust their landing location to stay safe. Crevasses open up, and slopes and surface conditions change. These changes are becoming more of an issue as the ice and snow fields recede.

72. TIA does have concerns that the exact size and boundaries of the proposed zones could have impacts on aircraft safety and on the visitor experience of other users of the Park, and that in some cases this could outweigh the value of the increased size of the zone.
73. Pilots have very concise and agreed 'routes' into and out of existing landing sites; this enables them to confidently predict where other aircraft will be. The size of the proposed zones and the resulting unpredictability of helicopter movements could present a safety risk and this must be carefully assessed and mitigated.
74. The current landing site model enables Park users to predict where they can expect to encounter aircraft and experience aircraft noise. They can then plan their experience in the Park around their desired level of interaction with aircraft. A risk of the proposed landing zone model is that it could make this difficult.
75. In some areas of the Park the level of existing/historical aircraft activity, particularly overflights, is such that a large landing zone does not have a significant impact - visitors would already expect to have higher levels of interaction with aircraft. Other areas of the Park have a low level of existing/historical aircraft activity. Visitors have traditionally gone to these areas for an experience which has relatively little interaction with aircraft. A broad landing zone model in these places, even if there are relatively low numbers of allocated landings, could make it challenging to predict where an aircraft will land and therefore to plan this kind of trip.

Positions

- Before new landing zones are operationalised, DOC must consult with aircraft user groups on the boundaries of the landing zones to ensure they enable acceptable levels of safety.
- DOC must consult with affected parties to ensure the size and location of proposed landing zones does not inadvertently impact opportunities for visitor experience with low levels of interaction with aircraft - particularly in areas which currently offer this experience and are highly valued by these user groups. Affected parties should include aircraft and guided mountaineering concessionaires, recreational groups and the NZ Mountain Guides Association.

Daily landing limits

76. Operators are currently allocated a number of landings per year in their concessions. This is known as an annual limit. Many operators currently use significantly less than their annual limit of landings. This is because daily landing opportunities in parks are limited by the weather which is often not suitable for flying, the number of helicopters which can fly and land safely in a given area, and the seasonality of visitor demand.
77. Moving to a model of allocating landings with daily limit constraints (beyond those which occur naturally) will adversely impact the viability of an aircraft business and could give a misleading impression of very high annual aircraft landing numbers.
78. Aircraft operators need to utilise their allocated landings when the weather and demand allows and daily limits will seriously impact the ability for an operator to run an economically sustainable business. A sustainable business is critical to providing high value visitor experiences and to meeting concession expectations around aircraft efficiency and noise management. Note that on days where the weather and demand enable flying, the landings in many places are already limited due to safety constraints.

79. We are also concerned that people could construe the number of landings in the Park per year to be a direct multiple of the daily limits. This gives a vastly inflated impression of the actual aircraft activity and makes it difficult for them to understand the real level of expected use. Aircraft access into our national parks is a sensitive issue and it is unhelpful to create a misleading picture of very high levels of use.
80. TIA's understanding is that while there are new landing sites proposed and landing zones have been introduced, the number of landings in the draft Plan are based on current levels of use. When speaking with stakeholder groups, the impression is that the draft Plan represents a significant increase in landings. We have not made comment on the number of landings at specific sites/zones as we do not have the technical expertise to do so.

Positions

- TIA does not support the change from annual to daily aircraft landing limits and strongly advocates for the current annual allocation policy to be retained.
- TIA submits that the Department carefully considers and acts on the feedback from aircraft concessionaires, guided mountaineering operators and the New Zealand Mountain Guides Association on the landing limits for particular sites/zones.

Tranquillity Outcomes

81. TIA has long advocated for evidence-based limit settings, and particularly for aircraft landing limits. We applaud DOC's work to develop what we believe is a world leading tool to map soundscapes and develop tranquillity ratings. TIA and our members have worked alongside DOC throughout the development of the tranquillity rating tool.
82. The application of the tranquillity rating tool into park plans is, however, a substantive change in the way sound is managed in a park. It is our position that the actual application of a change of this importance in scale and impact should have been informed by considerable dialogue with stakeholders to ensure its workability. Although tourism operators were well informed on the development of the tranquillity rating tool itself, the engagement was not continued into how it is to be actually applied in the Park. The result is that there is considerable confusion among tourism stakeholders as to how the proposed tranquillity outcome zones will actually work. It is critical that aircraft access as described in park plans is structured in a way that gives operators confidence and certainty to be able to plan and invest in their businesses and product mix.
83. We assume that as part of managing an overall soundscape there is considerable connectivity between the various tranquillity zones so therefore cannot support any of the tranquillity outcomes/zones in their current form.
84. The concerns which have led to this position include:
 - The tranquillity zones don't make practical sense e.g. Franz Josef Glacier – there is insufficient information to understand how aircraft can access the low tranquillity landing area (and utilise their concession landings) as it is completely surrounded by higher tranquillity zones.
 - Given that DOC does not have jurisdiction over activity in the air, it is not clear whether the tranquillity zones are a rule or a guidance for operators, and therefore what affect they will have on informing location of landing zones/sites, concession requirements and landing limits.

- There is no information on what the various tranquillity ratings actually mean in terms of aircraft use. This leads to important questions such as: How many landings will trigger a different tranquillity outcome? Over what time period should a place meet its tranquillity aim; 50% of the time, all the time? How does the sound of overflights affect landing opportunities? How high does an overflight need to be before it affects an area's tranquillity rating?
 - It is very difficult to tell how the tranquillity outcomes interact with the visitor management zones, and whether one is subservient to the other. This means that we cannot tell what will actually drive decisions on landing locations and numbers.
 - If the tranquillity outcomes are intended to influence flight paths, have the consequences of altered flight paths been considered – factors such as safety, efficiency of fuel usage, impact on other park users and viability in terms of weather?
85. There are already three zoning tools to signal management of aircraft in the Park; the visitor management zones, aircraft access zones and aircraft landing zones and sites.
86. TIA considers that while these three tools have some serious limitations, they are adequate to plan aircraft management in the Park. At this stage the Tranquillity Outcomes cause confusion and seem to add little to no value. It is important that the aircraft access zones stay well connected to the visitor management zones. Aircraft access is a highly valued way to access the Park and although sound impact is very important it is by no means the only thing to consider when allocating aircraft access.
87. The most fundamental limitation of the existing aircraft zoning tools is that they are not supported by objective evidence of the impact of aircraft noise. This means that current limits on landing numbers are almost entirely subjectively derived. The tranquillity rating tool measures sound against an objective scale. TIA strongly recommends that work on how to effectively implement the tool should be prioritised. It will add important evidence based rigour to this system, and should be extremely useful in helping describe sound outcomes within the aircraft access zones, for monitoring and measuring actual affect in these places, and to ensure that limits can be adjusted to reflect the reality of sound impacts.

Positions

- TIA supports the use of objective evidence to establish limits and accurately understand impact, both ecological and social, and therefore supports the concept of soundscapes and tranquillity modelling, and the science behind the tranquillity rating tool.
- TIA does not support the Tranquillity Outcome zones as presented in this Plan and submits that they are removed.
- TIA submits that the implementation of the tranquillity rating tool into the Plan needs significant further thought and testing, and that this process must include working alongside aircraft operators to ensure any outcomes proposed for the Plan makes practical sense.
- TIA submits that the above work should be prioritised. It will add important evidence based rigour to setting aircraft use limits in the Park, enable limits to reflect the reality of sound impacts in specific places, and enable evidence based changes to limits as circumstances change through the life of the Plan. These outcomes are all critical to supporting sustainable air access in our national parks.

Activity specific landings

88. The draft Plan and its associated aircraft topic paper have largely removed the link between aircraft landings and a certain activity occurring on the ground. It is TIA's understanding that the current Plan does not do this and largely specifies aircraft landings with an associated activity use.
89. The impact of an aircraft landing itself is not related to the purpose of the occupants once they land. In this regard the proposed change makes sense. Activity specified landings can also inadvertently shut out other recreational groups from accessing areas that are important to them.
90. There are, however, potential negative consequences of making non-activity specific landings the default setting. An area which was designated for landings for climbing or ski-touring could now involve sightseers. This may impact significantly on the experience of climbers who valued that place as a remote and important climb, whereas it may not provide the same degree of value to sightseers who could have had a similar experience elsewhere in the Park. Also a limited landing opportunity that is vital for undertaking an activity which cannot occur elsewhere in the Park may be used up by other recreationalists who could have used other landing sites.

Positions:

- Whether or not a landing is activity specific can have a strong effect on the recreational use of an area. Park plans should contain both activity specified and non-specified landing sites – depending on what achieves the best visitation outcomes for the area and for the Park as a whole.
- TIA submits that DOC carefully consider feedback from tourism businesses and recreational stakeholders when deciding whether the landing opportunities in the Plan should be activity specific or not, and adjusts the Plan accordingly.

The Amenities Area

91. TIA applauds DOC for taking a proactive and innovative approach in proposing the Amenities Area at Franz Josef Glacier. There is no doubt that the long term future of visitation on the Glacier needs creative and progressive thinking. It is important that the Franz Josef community and West Coast Tourism are supportive of an Amenities Area and TIA is of the understanding they are.
92. TIA would prefer that the Plan included more information to enable us to establish a firm position on the proposal. We acknowledge that the development of the Gondola itself will be subject to consent and authorisation requirements which will most certainly include public notification and the associated sharing of more detailed information. The areas where we believe more information is required include:
 - The Gondola proposal is in early concept stage and it is yet to be determined whether it is viable. The Plan states that the Amenities Area could be utilised for other types of amenities – without any indication of what those other types of amenities might be.
 - Any initiative which requires an Amenities Area should result in an overall gain for conservation and visitation. While the Amenities Area and proposed Gondola may well achieve this, the proposal as presented in the Plan does not adequately describe how it meets either of these important points.

- TIA believes there is an assumption among many stakeholders that a Gondola will mean a reduction of aircraft traffic in the valley and therefore a decrease in associated noise. We note the Plan does not address this point. If it is DOC's intention to reduce aircraft landing opportunities on the Glacier it is important to know that so we can factor the impact on existing businesses into our position on the Amenities Area.
 - We would prefer to have at least some indication of what impact the structures may have on the intrinsic value of the area. The Plan states that there is currently limited evidence on this.
93. TIA would prefer to see the Amenities Area discussion supported by a broader consideration of the future of visitation and conservation in the Franz Josef and Fox Glacier valleys. The Plan points to the Gondola, park and ride, parking management and higher tranquillity outcomes over the lower Franz Josef Glacier as solutions to the long term visitation requirements for the glacier valleys. TIA sees the topic as more complex than this.
94. We believe planning for the future of visitation of the glacier valleys would benefit from further discussion and an integrated destination management approach. This process should include planning for well beyond the life of the Plan, must include tourism stakeholders, and should be informed by conservation aims, the Government Tourism Strategy and the tourism industry's sustainable growth framework - 2025 and Beyond. TIA is pleased to see this type of approach signalled in Section 4.1.3 policy 8, but recommends that it extend to include both glaciers.

The lack of ambition in regards to new recreational opportunity.

95. The Plan pays a justifiably significant amount of attention to managing and enabling front country short-stay visitation, but it lacks ambition for enabling other recreational use. This lack of ambition does not align well with the high recreational value offered by the Park, or with the importance of enabling sustainable recreation by the increasing numbers of domestic and international people visiting the Park.

Positions:

- TIA supports the development of all the new recreational opportunities listed on page 101 of the Plan - as described in the accompanying background information paper 'future recreational opportunities'. We submit that the development of these opportunities be included in relevant policies and milestones within the Plan.
- TIA submits that the Plan should articulate a commitment to the importance and continued use of existing high alpine huts, and that Section 3.1 policy 16 a) iv) be adjusted to suit.
- TIA submits that Section 3.1 policy 16 includes taking into account the importance of high alpine guiding and instruction activities in the Park, and that consultation statements include concessionaires and recreational groups.
- TIA submits that milestones with regard to new recreational opportunities be brought forward to earlier in the life of the Plan and particularly Section 4.1.3 milestone 10, and Section 4.2.3 milestone 9.
- TIA submits that DOC pay careful attention to submissions on the above matters including any requests for development of tracks, huts and other recreational opportunities.

- TIA supports Section 4.2.3 policy 2.

Additions to the Park

96. Section 3.2.1 states a policy of seeking to add land and waters to the Park, but there are no specific areas proposed. TIA does not have a specific suggestion for an addition to the Park. We do note there is much surrounding land and water of outstanding natural amenity, and that indeed the Park sits in the heart of the Te Wāhipounamu South West New Zealand World Heritage Area. Our national parks are critical for achieving New Zealand's conservation aims and for providing recreational opportunities. Given the above points it seems anomalous that no additions to the Park have been proposed in this Plan.

Positions

- TIA submits that additions to the Park are investigated. Consultation on new areas should include tourism operators.

Including Concessionaires in conservation work and pest control

97. The Plan is inconsistent in its inclusion of concessionaires and other businesses when referencing working with others on conservation efforts and pest control.

Positions:

- TIA submits that references to conservation work and pest control include working with concessionaires and other businesses.
- Section 2.5.1 policy 7 be amended to remove the word 'small'. The policy is relevant to all sized businesses.
- Section 3.1 policy 6 be amended to specifically include the New Zealand Mountain Guides Association.

Dog walking

98. TIA supports DOC's efforts to include opportunities for people to walk their dogs in the Park. We are however aware of the risk this could pose to our native wildlife. We would therefore rely entirely on the advice of wild life specialists as to whether dog walking is suitable in any particular area, and under what conditions.

Position

- TIA supports the inclusion of the proposed dog walking areas and conditions into the Plan on the condition they are supported as suitable by appropriate wildlife specialists.

The use of E-Bikes and Mountain Bikes in the Park

99. TIA supports the inclusion of e-bikes and mountain bikes as a means of recreation in the Park. These are important and popular forms of recreation which enable a wide range of people to gain enjoyment from and establish connection with the Park. TIA believes they can be used on both designated and shared trails if well managed.

Position

- TIA supports the use of mountain bikes and e-bikes in the Park as per Section 3.2.14.

Allocation of hut space

100. Section 3.1 policy 12 require no more than 50% of available bunk space in a hut to be occupied by visitors there on a guiding concession. TIA supports the view of the New Zealand Mountain Guides Association that hut use is well managed, particularly in the high alpine huts, and that this policy is not necessary.
101. Section 3.1 policy 15a) should be considered on a hut by hut basis and take into account the reality of gains versus additional work for DOC. While some huts could benefit from a booking system, many are well supported by DOC's current system of letting visitors know hut occupancy rates.

Position:

- TIA submits that Policy 12 in Section 3.1 be removed.
- TIA submits that Section 3.1 policy 15a) be re-worded to reflect the above feedback, and that the implementation of this policy includes consultation with alpine guiding concessionaires, the New Zealand Mountain Guides Association and recreational groups.

Mandatory shut down of aircraft on landing

102. TIA believes that the requirement in Section 4.3.2 policy 7a) ii) that aircraft shut down on landing goes against industry good practice and could be unsafe.

Positions:

- TIA submits that Section 4.3.2 policy 7a) ii) be removed.
- TIA recommends that DOC continue to work with aircraft user groups to support agreements where operators shut down their machines to manage noise impact on other users whenever safe and practicable to do so.

Follow up process

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

Background

104. 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 offering 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.

105. Despite being New Zealand's number one export earner, the visitor economy is in fact dominated (60%) by domestic tourism. New Zealanders recreating away from their home areas, many of them doing so without the support of concessionaires, are a critical part of the tourism industry.

106. Tourism industry key facts:

KEY FACTS

- Tourism in New Zealand is a \$107 million per day 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.
- Tourism is New Zealand's biggest export earner, contributing \$16.2 billion or 20.6% of New Zealand's foreign exchange earnings (year ended March 2018).
- 13.5% of the total number of people employed in New Zealand work directly or indirectly in tourism. That means 365,316 people are working in the visitor economy.
- The [Tourism 2025](#) growth framework has a goal of growing total tourism revenue to \$41 billion a year by 2025.

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