

Submission Form

Paparoa National Park Management Plan draft



Once you have completed this form

Send by post to: Paparoa Park Plan Review, Department of Conservation, Private Bag 4715, Christchurch 8140 or email to: paparoanp@doc.govt.nz

Submissions must be received no later than 4.00pm, Friday 5 August 2016

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/paparoa

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 St Wellington 6142
Telephone number: <i>(the best number to contact you on)</i>	027 224 2070
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	

New Zealand Recreation Association submission on the draft Paparoa National Park Management Plan

1. Introduction

- 1.1 The New Zealand Recreation Association (NZRA) welcomes this opportunity to make a submission on the draft Paparoa National Park Management Plan, which is intended to replace the current, 24-year-old plan.
- 1.2 NZRA commends the Department of Conservation (DOC) on its objective of completing a National Park Management Plan within a 12-month timeframe. It also commends DOC on consulting with major stakeholders prior to drafting the new plan. NZRA agrees with DOC that early, high-quality consultation favours a less contentious process, and better outcomes.

2. The New Zealand Recreation Association

- 2.1 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. Its role is to champion high quality recreation for the benefit of New Zealand.
- 2.2 NZRA's membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, outdoor recreation businesses, clubs, national recreational organisations and others involved in the delivery of recreation in New Zealand.
- 2.3 The importance of recreation to New Zealand cannot be understated. For individuals, recreation contributes to physical and mental wellbeing and provides an opportunity to meet new people. Recreation fosters community cohesion and resilience, and supports the integration of diverse ethnic and other social groups.
- 2.4 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, and in areas which offer quality lifestyle and family options. The market value of recreation and sport is estimated by Sport New Zealand to be at \$5.2 billion, or nearly three per cent of GDP. The nation's recreation opportunities are fundamental to our tourism industry, with about 50 per cent of international visitors to New Zealand participating in one form of outdoor recreation or another.
- 2.5 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.

3. The draft Paparoa National Park Management Plan

3.1 The following table outlines NZRA's detailed position on the proposed plan.

Clause	NZRA's position	NZRA's comments
2.1.3	Support	Community involvement is essential if we are to make New Zealand predator free by 2050. NZRA believes that pest control activities should be encouraged by DOC as a recreational activity.
2.1.4	Support with an amendment	"Encourage" should be changed to "Facilitate".
2.1.6	Support	Community involvement is essential to the goal of a predator free New Zealand by 2050. DOC should proactively seek out community partnership opportunities.
2.2		If DOC expects all recreational users to Rock Shelter and midden at Buller Creek to show sensitivity because of the historical and cultural value of these sites, then the Department needs to make people better aware of this value by publicising it more clearly.
2.2.2	Strong support	This is of the utmost importance and urgency. In addition, the records must be readily available to the public.
2.2.3	Strong support	It is essential that recreationalists are made aware of any sites of historic and cultural significance, to avoid inadvertent misuse.
2.3.1 (b)	Do not support	NZRA submits that demand for recreational opportunities often follows supply. NZRA encourages DOC to adopt a 'build it and they will come' mindset with regard to facilitating recreational opportunities. Examples such as the structures and facilities that DOC has built at Kura Tawhiti and Godley Head are testament to this. NZRA is concerned that a 'demand is evident and is expected to be maintained' standard lends itself to an ever-decreasing level of recreational facilitation. NZRA submits that DOC should pay particular regard to its legal requirement under the Conservation Act to foster the use of natural and historic resources for recreation.

2.3.3	Support	NZRA submits that building partnerships is essential for DOC to optimise recreation destinations. In addition, it specifically lists, NZRA, Federated Mountain Clubs, New Zealand Alpine Club, New Zealand Speleological Society, NZDA, Sport NZ, Trail Fund and Whitewater New Zealand as organisations that DOC should partner with.
2.3.4	Support	Any perception of conflict must be supported by evidence.
2.3.5	Strong support	
2.4 (Community Engagement)		In this section (page 33), recreation seems deeply subservient and of secondary importance to conservation. It appears that recreational engagement is seen solely as a means of raising awareness of the Paparoa National Park's conservation values. NZRA submits that DOC should pay particular regard to its legal requirement under the Conservation Act to foster the use of natural and historic resources for recreation. NZRA submits that attention should also be paid to section 4.1.1 of the West Coast Conservation Management Strategy which states that the ' <i>provision for appropriate recreation, use and enjoyment of public conservation lands</i> ' is to be a management focus for the Department.
2.4 (Business Engagement)	Support with an addition	NZRA submits that an additional objective (c) is included that reads "increasing recreational opportunities."
2.4.5	Support with an addition	NZRA submits that this policy should be amended to "reduce barriers to participation through effective communication, and acknowledge the contribution of the community, with clearly articulated conservation and recreation goals."
3.3.2	Do not support	The use of 'fixed pitons' is an historical practice and highly unlikely to occur in modern caving. The term should be removed from DOC planning documents with regard to caving.
3.3.2	Do not support	Requiring a caver to consult with three separate organisations in order to carry out a full assessment of the impact of placing a bolt is unreasonable,

		unworkable and likely to be ignored. Modern bolting practices have minimal impact on the environment and are essential for the safety of cave exploration. The people most capable of assessing the effects and necessity of bolts in caves are cavers themselves, in accordance with the New Zealand Speleological Society's bolting guidelines.
3.3.3(a)	Support with an addition	NZRA supports the undertaking of a review of the West Coast Cave and Karst Management Strategy and Operational Guidelines, but submits that this objective should be time-bound and ideally achieved within three years.
3.4	Amendment required	NZRA submits that the heading "Climbing/fixed anchors" is flawed. There are numerous types of climbing that could be carried out within the Paparoa National Park including bouldering, traditional rock climbing and mountaineering. Perhaps what is referred to here is Sport Climbing, which requires the use of fixed protection or bolts. Regardless, having 'fixed anchors' in the heading alongside 'climbing' is flawed and incongruous.
3.4	Do not support	Requiring a climber to obtain authorisation to place a bolt is unreasonable and likely to be ignored. Modern bolting practices have minimal impact on the environment and are essential for safety if climbing on limestone karst. Allowing for bolting actually reduces environmental impact as it discourages climbers from climbing vegetated cracks. NZRA submits that the policy should require that climbers act in accordance with the New Zealand Alpine Club's Position on Bolting (2010) and the Bolting Technical Guidelines (2005). NZRA submits that the rock climbing community has an ingrained culture of environmental care and tends towards placing the fewest number of bolts necessary.
3.4	Do not support	The use of fixed anchors should not be restricted to the Climbing Area within Nikau Place. NZRA submits that it is highly unlikely that bolting will occur to any great extent elsewhere. It would be unwise to place a blanket ban on any

		<p>further areas, as there are numerous other accessible cliffs that could be utilised for recreational purposes. This is especially true when one takes into account the length of time between the writing of each National Park Management Plan. Exploration of new climbing terrain is ongoing. NZRA supports the spirit of exploration and the creation of new recreational opportunities, where it does not conflict with the interests of other users.</p>
3.4.1	Do not support	<p>NZRA submits that the proposed requirement for a climber to undertake a consultation and full assessment of effects before exploring a new area for climbing is unreasonable and likely to be ignored. The people most capable of assessing the effects and impacts of new climbing routes are climbers themselves, with guidance from the New Zealand Alpine Club.</p>
3.4.3	Do not support	<p>NZRA submits that fixed anchors and bolts placed and used by climbers are not 'structures' that require management by DOC or any other organisation. Every climbing guide makes reference to the fact that bolts are to be assessed and used at the discretion of each climber that uses them. The people most capable of assessing the safety of bolts are climbers themselves. The New Zealand Alpine Club promulgates two documents, the Position on Bolting (2010) and the Bolting Technical Guidelines (2005), which should be referred to. It is unrealistic to expect that New Zealand Alpine Club or any other organisation would assume the responsibility for managing fixed anchors and bolts.</p>
3.6	Support with an addition	<p>NZRA submits that the 300-watt limit on e-bikes should be referred to in this section. While it is included in the glossary, not everyone will refer to it. It could easily be the case that a recreational user would assume that a much more powerful e-bike is being allowed.</p>
3.7.1	Support with an addition	<p>NZRA submits that this policy should make reference to the Mountain Bike NZ Code of Conduct.</p>

3.14.1 Strong Support	Strong support	The protection of freshwater fisheries is of the utmost importance. Freshwater fishing is a recreational activity enjoyed by tens of thousands of New Zealanders every year.
4.1	Correction (page 58)	NZRA submits that it is incorrect to state that "...climbs have fixed anchors (bolts) installed by....the New Zealand Alpine Club". To our knowledge, New Zealand Alpine Club has never, as an organisation, installed bolts in the Paparoa National Park. It may be the case that individual members of New Zealand Alpine Club have installed bolts at their own volition. Or it may be the case that funds have been granted from the New Zealand Alpine Club Bolting/Access Fund to an individual for the purpose of installing bolts in the Paparoa National Park, but that would have to be verified.
4.1 Nikau Place Outcome (4)	Strong support	NZRA strongly supports the outcome that Nikau Place hosts a deep and diverse range of recreational opportunities.
4.1 Nikau Place Outcome (5)	Strong support	NZRA strongly supports the outcome that the Inland Pack track is rejuvenated and enjoyed by trampers. Its fall into disrepair has seriously undermined tramping opportunities in the area.
4.1 Nikau Place Outcome (7)	Support with an amendment	NZRA submits that this outcome should be amended to: "A self-guided caving experience has been developed, <i>in conjunction with the New Zealand Speleological Society</i> in Nīkau Place to help educate and increase awareness of the delicate ecosystems within underground environments."
4.1 Nikau Place Outcome (5)	Do not support	NZRA submits that fixed anchors and bolts placed and used by climbers are not 'structures' that require management by DOC or any organisation. Every climbing guide makes reference to the fact that bolts are to be assessed and used at the discretion of each climber that uses them. The people most capable of assessing the safety of bolts are climbers themselves. The NZAC promulgates two documents, the Position on Bolting (2010) and the Bolting Technical Guidelines (2005), which should be referred to. It is

		unrealistic to expect that any other organisation would assume the responsibility for managing fixed anchors and bolts. Any such outcome is unworkable and likely to be ignored.
4.1.14	Do not support	NZRA submits that the notion of confining sport climbing to Bullock Creek is flawed. There are numerous other climbing routes with fixed protection already in place, and there is potential for many more.
4.1.15	Do not support	NZRA submits that the proposed requirement for a climber to undertake a consultation and receive authorisation before placing a bolt for climbing is unreasonable and likely to be ignored. The people most capable of assessing the effects and impacts of new climbing routes, are climbers themselves, with guidance from the New Zealand Alpine Club. The New Zealand Alpine Club promulgates two documents, the Position on Bolting (2010) and the Bolting Technical Guidelines (2005), which should be referred to.
4.1.16	Do not support	NZRA submits that the requirement for a climber to undertake a consultation before exploring a new area for climbing is unreasonable and likely to be ignored.
4.1.17	Support with an amendment	NZRA submits that the following text should be added: "...in areas that are clearly and credibly identified as culturally or ecologically sensitive sites."
4.1.18		NZRA submits that fixed anchors and bolts placed and used by climbers are not 'structures' that require management by DOC or any other organisation. Every climbing guide makes reference to the fact that bolts are to be assessed and used at the discretion of each climber that uses them. The people most capable of assessing the safety of bolts are climbers themselves. The New Zealand Alpine Club promulgates two documents, the Position on Bolting (2010) and the Bolting Technical Guidelines (2005), which should be referred to. It is unrealistic to expect that NZAC or any other organisation would assume the responsibility for managing fixed anchors and bolts.

4.2 Ti Kouka Place outcome (1)	Support	NZRA supports the establishment of the Pike29 Memorial Great Walk and the recreational opportunities it will create.
4.2 Ti Kouka Place outcome (2)	Support	NZRA supports the diverse range of recreational interests that the establishment of the Pike29 Memorial Great Walk will cater for.
4.2 Ti Kouka Place outcome (4)	Support	NZRA supports the outcome that visitors experience moderate encounters with aircraft, but is concerned over what is defined as moderate as the word lacks specificity.
4.2.4	Strong support	NZRA supports the establishment of the Pike29 Memorial Great Walk and the diverse range of recreational opportunities it will create.
4.2.7	Support	NZRA submits that careful management and monitoring of conflict on the Pike29 Memorial Great Walk must be carried out. Significant enforcement action must take place to ensure that only appropriate mountain biking activities take place and that e-bikes do not exceed the 300-watt limit.
4.2.9 (a)	Do not support	NZRA submits that the transportation of packs, mountain bikes and passengers is unnecessary, unless in special circumstances. Aircraft access to the landing sites at the huts should be restricted only to what is necessary for the maintenance and management of the huts themselves.
4.2.9 (c)	Do not support	NZRA submits that this policy is inconsistent with Ti Kouka Place outcome (4).
4.3.3	Do not support	NZRA submits that Ananui should be accessible to private recreationalists, as well as concessionaires.
4.3.4	Do not support	NZRA submits that Ananui should be accessible to private recreationalists, as well as concessionaires.
4.4.2	Support with an amendment	NZRA submits that the text of this policy should be changed to: " Encourage the development of new public recreational tracks in Horoeke Place (including community-led initiatives for new public tracks) where adverse effects on natural, cultural and historic values can

		be avoided, remedied or mitigated, and demand is evident.”
4.4.3	Support with an amendment	NZRA submits that the text of this policy should be changed to: “ Facilitate individual and community initiatives to maintain tracks in Horoeke Place.”
5.1.5	Strong support	NZRA strongly supports public notification and submissions with regard to National Park plan amendments and submits that they are essential for gaining and maintaining the trust of the New Zealand public. NZRA notes with concern recent examples - the Routeburn Track and Fiordland helicopter landings – that have led to an erosion of community and public trust.
6.1 (3)	Supports with an amendment	NZRA submits that the text of this milestone should be changed to: “A review of the West Coast Cave and Karst Management Strategy and operational guidelines is complete. ”
6.1 (6)		NZRA submits that fixed anchors and bolts placed and used by climbers are not ‘structures’ that require management by DOC or any other organisation. It is unrealistic to expect that New Zealand Alpine Club or any other organisation would assume the responsibility for managing fixed anchors and bolts.
6.1 (12)		NZRA submits that this milestone should be achieved by the end of Year 3.
6.1 (14)		NZRA submits that fixed anchors and bolts placed and used by climbers are not ‘structures’ that require management by DOC or any other organisation. It is unrealistic to expect that New Zealand Alpine Club or any other organisation would assume the responsibility for managing fixed anchors and bolts.
6.1 (27)		NZRA submits that fixed anchors and bolts placed and used by climbers are not ‘structures’ that require management by DOC or any other organisation. It is unrealistic to expect that New Zealand Alpine Club or any other organisation would assume the

		responsibility for managing fixed anchors and bolts.
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4. Conclusion

NZRA considers that the draft Paparoa Management Plan in its current form requires significant amendments to better reflect the recreation landscape. While NZRA advocates for recreation accompanied by safe and responsible behaviour, the proposed plan includes unrealistic exigencies that do not take into account solid, existing guidelines for activities such as rock climbing and caving.

NZRA strongly supports the plan where it acknowledges the importance of preservation (for areas such as freshwater fisheries), and where it calls for developments that promote enhanced outdoor opportunities, such as the establishment of the Pike 29 Memorial Great Walk and the rejuvenation of the Inland Pack track. It believes however that more can be done to work collaboratively with other agencies, and that the value of recreation needs to be better acknowledged and further considered in the plan, not as secondary but as equal in importance to conservation outcomes.

NZRA remains hopeful that the proposed plan presents an opportunity for local and international visitors to access positive outdoor experiences that will contribute to their individual well-being and to the resilience of local communities.